

Public Law Webinar: Public Sector Equality Duty

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Public Law Webinar – meet the speakers



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The Public Sector Equality Duty ("PSED"): The Basics and 'Curing a Breach'

- First half: summary of section 149 and the main principles
- Second half: if the PSED has been breached, can it be cured?



Section 149 Equality Act 2010

The PSED requires public authorities to have "due regard" to:

- The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the EqA 2010 (*section 149(1)(a)*).
- The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it (*section 149(1)(b)*).
- The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it (*section 149(1)(c)*).



Advancing Equality Opportunity

Second requirement

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it (*section 149(4)*); and
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.



Bracking v SSWP: Summary of Principles (1)

- An important evidential element in the demonstration of the discharge of the duty is the recording of the steps taken by the decision maker in seeking to meet the statutory requirements: *R (BAPIO Action Ltd) v Secretary of State for the Home Department [2007] EWHC 199 (QB)* (Stanley Burnton J (as he then was)).
- The duty must be “exercised in substance, with rigour, and with an open mind”. It is not a question of “ticking boxes”; while there is no duty to make express reference to the regard paid to the relevant duty, reference to it and to the relevant criteria reduces the scope for argument.



Bracking v SSWP: Summary of Principles (2)

- The relevant duty is upon the Minister or other decision maker personally. What matters is what he or she took into account and what he or she knew. Thus, the Minister or decision maker cannot be taken to know what his or her officials know or what may have been in the minds of officials in proffering their advice: R (National Association of Health Stores) v Department of Health [2005] EWCA Civ 154 at [26 – 27] per Sedley LJ.
- Officials reporting to or advising Ministers/other public authority decision makers, on matters material to the discharge of the duty, must not merely tell the Minister/decision maker what he/she wants to hear but they have to be “rigorous in both enquiring and reporting to them”: R (Domb) v Hammersmith & Fulham LBC [2009] EWCA Civ 941 at [79] per Sedley LJ.



Bracking v SSWP: Summary of Principles (3)

- The concept of ‘due regard’ requires the court to ensure that there has been a proper and conscientious focus on the statutory criteria, but if that is done, the court cannot interfere with the decision simply because it would have given greater weight to the equality implications of the decision than did the decision maker. In short, the decision maker must be clear precisely what the equality implications are when he puts them in the balance, and he must recognise the desirability of achieving them, but ultimately it is for him to decide what weight they should be given in the light of all relevant factors.



Bracking v SSWP: Summary of Principles (4)

- The PSED in this case involves a duty of inquiry. The submission is that the combination of the principles in *Secretary of State for Education and Science v Tameside Metropolitan Borough Council [1977] AC 1014* and the duty of due regard under the statute requires public authorities to be properly informed before taking a decision. If the relevant material is not available, there will be a duty to acquire it and this will frequently mean that some further consultation with appropriate groups is required.



Bracking v SSWP: Rearguard Action and 'Curing a Breach'

- A Minister must assess the risk and extent of any adverse impact and the ways in which such risk may be eliminated before the adoption of a proposed policy and not merely as a "rearguard action", following a concluded decision: per Moses LJ, sitting as a Judge of the Administrative Court, in *Kaur & Shah v LB Ealing [2008] EWHC 2062 (Admin)* at [23 – 24].



Rearguard Action and 'Curing a Breach': Caselaw

- A Kaur & Shah v LB Ealing [2008] EWHC 2062 (Admin) cited in Bracking.
- Prichard v SSWP [2020] EWHC 1495 (Admin) Laing J held that Kaur of 'dubious authority' and 'clearly wrong'. D conceded and concerned with legislation that pre-dated Equality Act 2010. Point that cited in Bracking therefore also had to be treated with caution ([87]-[88] and [120]).
- Metropolitan Housing Trust Ltd v TM [2021] EWCA Civ 1890 decision on the facts was quashed. On general principle, however, Nugee LJ at [43] noted that Kaur line of caselaw concerned one-off decisions rather than ongoing proceedings. In possession proceedings: 'I am not persuaded that there is anything wrong in referring to late compliance with the PSED as remedying or curing the breach.'



'Curing a breach': Planning Example

- SSCLG v West Berkshire DC [2016] EWCA Civ 441. At first instance Holgate J quashed the decision, but the Court of Appeal at [87] disagreed with remedy: 'Nothing we say should be thought to diminish the importance of proper and timely compliance with the PSED. But we have strong reservations about the proposition that the court should necessarily exercise its discretion to quash a decision as a form of disciplinary measure... The court's approach should not ordinarily be that of a disciplinarian, punishing for the sake of it, in these circumstances. The focus should be on the adequacy and good faith of the later Assessment, although the court is entitled to look at the overall circumstances in which that Assessment was carried out... We do not think... that an order quashing the decision must follow.'



'Curing a Breach': Extreme Example

- Fordham J in *R(oao Rowley) v Minister for the Cabinet Officer [2021] EWHC 2108 (Admin)* at [43]: 'It is obvious that the PSED Assessment has been produced in the context of the judicial review proceedings, and 'at the door of the Court'. Nothing is more likely to focus the judicial mind. But the standards of scrutiny remain the same. I do not accept that the PSED Assessment is a rear-guard shield. No evidence before me suggests that it was produced with an 'agenda', or that the writer was reasoning backwards from a chosen policy position being defended before a Court... The Court has been presented with the PSED Assessment as an objective and open-minded consideration of the issues. In my judgment, and on that basis, the PSED Assessment is a rigorous evaluation which recognises the features of the statutory duty and which cannot, in any material respect, be said to be a failure of 'due regard'.'



'Curing a Breach': Conclusions

- Much better to discharge duty before making decision
- Can be more complicated in an iterative process such as local plan-making.
- Keep assessment under review
- Some scope for avoiding quashing of a decision even after proceedings brought if carry out rigorous and open-minded assessment
- For Claimants, consider what the remedy is likely to be even if successfully demonstrate breach



Roadmap

1. R (Marouf) v Secretary of State for the Home Department
[2023] UKSC 23; [2023] 3 WLR 228 - does the PSED have extraterritorial effect?

2. Webb-Harnden v London Borough of Waltham
[2023] EWCA Civ 992 – PSED is context-specific + procedural

R (Marouf) v Secretary of State for the Home Department



(Supreme Court, 28 June 2023)

Facts:

- Ex gratia resettlement scheme for refugees fleeing the Syrian conflict
- Access to the scheme limited to those who had been referred by UNHCR
- The Appellant (**A**) had fled Syria but was a Palestinian refugee (living in Lebanon)
- **A** was unable to access scheme because as a Palestinian refugee she fell under the exclusive mandate of the UN's Relief and Works Agency (and so could not be subject to a referral by UNHCR)



R (Marouf) v Secretary of State for the Home Department



Legal issue:

- Had SoS breached s149(1)(b) by failing to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic (i.e. being a Palestinian refugee) as compared with persons who do not share it (i.e. other refugees)?
- Main issue = **what was the territorial scope of the public sector equality duty?**
- **A** argued:
 - (1) Whole of s149 had extraterritorial effect, relying in particular on s149(1)(b)
 - (2) Alternatively, s149 had extraterritorial effect co-extensively with the extraterritorial effect of substantive duty in section 29(6) and (9) of the EA 2010...



Answer = PSED has no extraterritorial effect

Public bodies are not required to have due regard to the goals listed in s149 when exercising their functions in so far as that exercise affected the lives of people living outside the UK



- Worth looking at the Supreme Court's reasoning...



Presumption against extraterritorial effect of legislation

- Supreme Court reiterated the “well-established principle” that there is a presumption against leg. having extra-territorial effect [41]
- Can be rebutted by express words or implication but it is a “high threshold” to overcome [41]
- **A** had argued that presumption only a qn. of construction and only arose if extraterritorial effect would undermine int. comity / interfere with state sovereignty (relying on *Bilta (UK) Ltd v Nazir (No 2)* [2016] AC 1; *R (KBR Inc) v Director of the Serious Fraud Office* [2022] AC 519)
- SC reviewed previous authorities + none signalled shift away from the principle [40]



Nb. Hottak + Hoareau disapproved:

Previous Divisional Court authorities had found (/accepted) PSED had extraterritorial effect:

- R (Hottak) v SSFCA [2015] IRLR 827
- R (Hoareau) v SSFCA [2019] 1 WLR 4105

Neither case cited to the presumption against extraterritoriality or case-law on it

R (Marouf) v Secretary of State for the Home Department



Extraterritorial effect of s149 as a whole

- **A** argued for extraterritorial effect notwithstanding that in most cases no impact (either public functions have no effect on people outside UK or, if they do, the public auth. (PA) cannot do much to achieve PSED aims)
- **A** argued that if no much can be done by PA then PSED easily discharged
- **SC** held that if there was likely to be no useful purpose in most cases by the duty applying extraterritorially then it is less (not more) likely Parliament had intended the duty to extend that far [46]
- **SC** also rejected **A's** argument that for PSED, Parliament's focus in legislating had been on the location of the PA subject to the duty (i.e. so long as PA was UK-based the PSED applied) [53]

R (Marouf) v Secretary of State for the Home Department



Supreme Court agreed with the Court of Appeal's reasoning (per Simler LJ) as to practical issues at [52] (CoA [102]*):

"I find it difficult to see why or how Parliament could have expected public authorities to take these steps in relation to people outside the United Kingdom in a place where the authority is unlikely to have any real sphere of operation, or in a place or country where different views may be taken on questions of equality and non-discrimination as reflected in local laws, customs and traditions. Certain characteristics that are protected characteristics in Great Britain are far from protected elsewhere and there may be great sensitivity in this regard. It cannot be for a public authority in this country to determine how best to advance equality of opportunity between people subject to foreign law, traditions and customs. These points reinforce the force of the normal presumption in this case."

*CoA case name is *R (Turani et al) v SSHD* [2021] EWCA Civ 348



Defining the relevant “community”?

“...The PSED is intended to ensure that the specified public bodies have due regard to the need to adopt policies which help to bring about the societal change that would see the elimination of discrimination, equality of opportunity and good relations between different groups within the community. There is no general duty under section 149 on public bodies to attempt to bring about that kind of change in countries outside the United Kingdom and it is not open to a person with a protected characteristic but no connection to the United Kingdom to challenge a decision of a public body on the grounds that a policy adopted failed to have due regard to the need to improve their position within that overseas community.” [54]



What about undermining the purposes behind the PSED?

- To aid decision-making and public accountability [55]
- Allows members of the public to see how their interests were taken into account
- Nothing to suggest that public bodies subject to PSED are intended to be accountable to people elsewhere in the world (beyond the UK) [56]
- Also issue of authorities being drawn into sensitive areas e.g. publishing views on how to encourage people with PCs in other countries to participate in public life

Potentially also a floodgates argument...?

- “The Appellant's argument would confer rights on people all over the world to challenge the decision-making process of a public body exercising its functions, if the exercise of the public body's functions affected them.” [64]

R (Marouf) v Secretary of State for the Home Department



But **important** - PSED is not the only procedural safeguard...

- **SC** reiterated that there may be cases where the kind of factors listed in s149 are so germane to the lawfulness of a decision/policy to be implemented overseas that they become relevant factors that the decision-maker must take into account [57]
- I.e. ordinary JR principles still apply + may provide a different basis for challenging a decision which failed to have regard to the factors in s149
- Examples where the courts have examined Gov's assessment of the effect of decisions overseas:
 - (1) Financing the Pergau Dam in Malaysia (R v SSFCA, ex p World Development Movement Ltd [1995] 1 WLR 386)
 - (2) The removal of the Chagossians from the British Indian Ocean Territory (R (Bancoult) v SSFCA (No. 2) [2009] 1 AC 453)

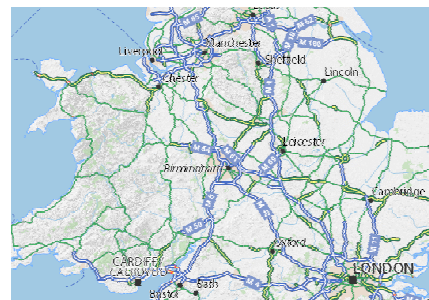
Webb-Hamden v London Borough of Waltham Forest



(Court of Appeal, 22 Aug 2023)

Facts:

- **A** is a single mother with 3 children; lived in London all her life; unintentionally homeless
- LA offered private sector shorthold tenancy with fixed term for 24 months (discharge of housing duty s193(2) Housing Act 1996)
- But offer was in Walsall (i.e. outside London and surrounding areas)
- **A** challenged reviewing officer's decision that LA's offer was suitable
- Reviewing officer concluded that LA had no suitable 3-bed property in/near London + **A** unlikely to afford suitable property in/near London due to the benefits cap





Legal issue:

- **Appeal ground:** did LA breach s149(1) by failing to consider the discriminatory impact of moving the Appellant's (single parent/female) household out of the borough due to her being impacted by the benefits cap?
- **A** argue that benefits cap was being used as proxy to determine what accommodation is suitable for applicants
- That put women at a disadvantage that might amount to indirect discrimination
- Reviewing officer had to have due regard to the need to eliminate disc. (s149(1)(a)) and the need to advance equality of opp. (s149(1)(b))



CoA held:

- PSED is **context-specific**: here, PSED needed to be seen in context of particular housing functions being exercised [37]
- LA had not used benefits cap as a proxy [38]
- Qn is whether reviewing officer had due regard to matters in s149 as a matter of substance not form [39]
- On facts, held that reviewing officer fulfilled s149 duty, including considering adverse consequences and particular disadvantages to **A** and family
- Accepted LA's argument that the decision would inevitably have been the same in any event

PSED as “context specific”



"The authorities show that the concept of 'due regard' is highly sensitive to facts and context. How intense the 'regard' must be to satisfy the requirements in [s149] will depend on the circumstances of the decision-making process in which the duty is engaged. What is 'due regard' in one case will not necessarily be 'due regard' in another. It will vary, perhaps widely, according to circumstances: for example, the subject-matter of the decision being made, the timing of that decision, its place in a sequence of decision-making to which it belongs, the period for which it will be in effect, the nature and scale of its potential consequences, and so forth. When the decision comes at an early stage in a series of decisions, and will not fix once and for all the impacts on people with protected characteristics, the level of assessment required to qualify as 'due regard' is likely to be less demanding than if the decision is final or permanent. This may especially be so if the decision is also experimental, and is itself conducive to a more robust assessment of equality impacts later in the process."

(R (Sheakh) v Lambeth LBC [2022] EWCA Civ 457 at [56]; cited to with approval by the SC in Marouf at [45])

Webb-Hamden v London Borough of Waltham Forest



"What the appellant is, in truth, seeking is a different result. She wishes to have the [s193(2)] duty performed in a different way by the provision of temporary accommodation which is suitable in the short or medium term but which will not bring the [s193(2)] duty to an end. She does not want the respondent to discharge its duty by arranging a private rented sector offer within the meaning of [s193] (7AC). The reason why the appellant wants the [s193(2)] duty to be performed in that way is that it will avoid the application of the benefit cap and enable her to be provided with temporary accommodation in London with the cost of the accommodation being paid for by the local housing authority. That, however, is to seek to use [s149] to achieve a substantive result: the performance of a function in a different way with different legal consequences from the way in which the respondent wishes to perform the function. That is not the purpose of [s149] and is not what the section requires..."



The Public Sector Equality Duty

The Public Sector Equality Duty Some practical implications and application of the PSED: Local Government Licensing



PSED: Local Government Licensing (LA 2003)

Licensing Act 2003, s 182 Guidance: Promotion of equality

[14.66] A statement of licensing policy should recognise that the Equality Act 2010 places a legal obligation on public authorities to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations, between persons with different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

[14.67] Public authorities are required to publish information at least annually to demonstrate their compliance with the Equality Duty. The statement of licensing policy should refer to this legislation, and explain how the Equality Duty has been complied with. Further guidance is available from [the] Government Equalities Office and the Human Rights Commission.



PSED & the Statement of Licensing Policy

Manchester City Council SLP (2021 – 2026)

“[2.37] The values of a fair and equal society that underpin the Act are at the heart of the Council’s ambitions for the city. The authority will ensure that premises are licensed in a manner consistent with the responsibilities under the Act to deliver the best equality outcomes for the city that it can.”

Westminster City Council SLP 2021

B30 However, equality and inclusion for us extends beyond this. We have experienced discriminatory policies that refuse admittance to venues simply because someone may not be the right ‘look’ or ‘fit’. Discriminatory policies such as these are inherently damaging to the individual, our wider community, as well as our economy.



Westminster CC SLP

Promoting Equality & Inclusivity in Licensed Venues

Our expectations on licensed venues to promote equality & inclusivity

B34. There is no one size fits all approach to making a venue inclusive, and each operator will need to make an assessment of its own practices and policies. However, the following are common and best practice examples that could be adopted:

- Inclusive and transparent policies (for example admittance policies may clearly stipulate adherence to a dress code and refusal if someone presents as intoxicated; however they must not prevent admittance based on perceived attractiveness, size or against any of the protected characteristics).
- Robust complaints procedures that make it easy for customers who feel they have been discriminated against to raise their concerns and understand how this will be investigated or managed.
- Accessible venue layouts that make venues welcoming.
- Comprehensive training on equality and inclusion for all staff. It is important that any training is regularly refreshed.



Westminster CC SLP

Using the Licensing Process

B35 We will use the Licensing Process to ensure both Operators and the Local Authority are compliant in carrying out their legal obligations. This includes:

- Providing pre-application advice to applicants.
- Determining licensing applications and reviews.
- Making representations as a responsible authority.
- Applying for reviews in appropriate circumstances.
- Defending appeal decisions.



Westminster CC SLP

B36 In practice this means that the council through the Licensing process will identify applicants that do not provide sufficient information on how they are promoting equality and inclusivity, and could make a representation to require that the applicant address the issue or explain to members of the Licensing Sub-Committee why they have not done so.



SLP Polies & PSED related polices

1. Women's Safety
2. Exploitation & safeguarding
3. Urban & MOBO (performance & venues)
4. Alcohol-free spaces
5. Kink & fetish venues



Integrating Strategies

S 182 Guidance [14.63] Integrating strategies

It is recommended that statement of licensing policy should provide clear indications of how the licensing authority will secure proper integration of its licensing policy with local crime prevention, planning, transport, tourism, equality schemes, cultural strategies and any other plans introduced for the management of town centres and the night-time economy. Many of these strategies are not directly related to the p[romotion of the licensing objectives, but, indirectly, impact upon them. Co-ordination and integration of such polices, strategies and initiatives are therefore important.

Eg s 17 of the Crime & Disorder Act 1998 (duty to consider crime and disorder implications); the Equality Act 2010 and the promotion of Women's safety, generally, and in the night-time economy. See, for example, the Women's Night Safety Charter (Mayor of London).

Integration should not duplicate other statutory provisions (s 182 Guidance, paras 1.16, 1.19 and 14.15)



Further Resources

Kirsty Tagg,
Violence against women and girls – an update on progress
(2023) JoL 35

Jo Cox-Brown,
Working together to make women safer at night
(2023) JoL 35



Equality Impact Assessment

Equality Impact Assessment ?

Is this a requirement?

Who prepares an EIA?

Is this good practice?



E1 Studio Space (Tower Hamlets) What is nudity?

E1 Studio Spaces (London Borough of Tower Hamlets)

Licensing Act 2003 condition: “No nudity or semi nudity permitted”

Local Government (Miscellaneous Provisions) Act 1982

The relevant provisions of the 1982 Act provide: “‘display of nudity’ means –

- (a) in the case of a woman, exposure of her nipples, pubic area, genitals or anus; and
- (b) in the case of a man, exposure of his pubic area, genitals or anus;”



Nudity & Gender self-identification

The 1982 Act definition was amended by Counsel instructed by and acting for the licensing authority to:

“No display of nudity by either performers or customers shall be permitted on the premises. “Nudity” is defined as (a) in the case of a woman, exposure of her nipples, pubic area, genitals or anus; and (b) in the case of a man, exposure of his pubic area, genitals or anus. References to “man” or “woman” include persons who **self-identify** as a “man” or “woman”.



Further Resources:

Leo Charalambides,
Whose adult entertainment is it, anyway? (2022) 34 JoL



LA 2003 and the PSED ('nudity' in Tower Hamlets)

"In light of this decision, the Sub-Committee considers that it can address the PSED issue quite briefly. The Sub-Committee specifically considered the applicant's EQIA and, in the absence of any other relevant information from the Licensing Authority, felt constrained to adopt the applicant's EQIA. The Sub-Committee noted that the nature of events meant that there was a greater impact on certain groups with protected characteristics. The Sub-Committee noted that although the events at the Premises tended to cater to the queer community, there were disparate groups of people attending these events, some of whom shared one protected characteristic, others who shared another, and some who had none at all. The Sub-Committee was informed that these events were inclusive and welcomed diversity and were open to all; being of the queer community was not a prerequisite for attendance or entry. Given the comments made by some of the supporters as to harassment and discrimination that they faced in mainstream venues, and how safe they felt at events such as Klub Verboten, the Sub-Committee accepted that these events were of considerable importance to the queer community.

For completeness, however, the Sub-Committee was aware that the PSED did not require it to achieve a particular result and the above was in no way determinative of the issue. Whilst the Sub-Committee had had due regard to the PSED, the removal of the condition was simply because of the approach required to be taken under the Licensing Act 2003". (July, 2022)



Sex Equality-based concerns

R (CDE) v Bournemouth, Christchurch & Poole Council [2023] EWHC 194 (Admin)

The sex equality-based concerns related to concerns that SEVs (lap dancing type) contribute to a culture of objectification, exploitation, discrimination and sex-based violence reinforcing negative attitudes by men of women and girls. These concerns has been categorised by the council as “moral concerns” and inadmissible (*R v Newcastle Upon Tyne CC ex parte The Christian Institute* [2001] LGR 165)

While moral objections ought to be distinguished sex-based equality concerns were not moral concerns and ought to be grappled with and rigorously considered.



Taxi & Private Hire Policies: Accessibility

DfT, Taxi & Private Hire Vehicle Licensing;

Best Practice Guidance for Licensing Authorities in England (2022 – consultation version)

4.7 (To mitigate these physical barriers authorities must ensure that due regard is given to the Public Sector Equality Duty (PSED) (see s 149 of the Equality Act 2010) when taking decisions concerning the provision of taxi and private hire vehicle services and supporting infrastructure, and that reasonable adjustments are made to remove barriers preventing disabled people from accessing taxi and private hire vehicle services.

Barriers include: Physical barriers are at 4.6 spacing at ranks / waiting areas / WAV supply, vehicle designs and street design. But, also communication barriers, assistance dogs, confidence barriers (supporting an inclusive service plan – *i.e.* integration).



Taxi & Private Hire Policies: Accessibility

4.23: “All licensing authorities must ensure that due regard is given to the PSED when taking decisions concerning the provision of taxi and private hire vehicle services and supporting infrastructure. Licensing authorities must also ensure that reasonable adjustments are made to remove physical barriers preventing disabled people from accessing taxi and private hire vehicle services, including the adoption of any policies affecting the carriage of assistance dogs or the investigation and prosecution of drivers alleged to have discriminated against their owners.”



Taxi & Private Hire Policies: Accessibility

Complaints (non-criminal) [4.26] range of outcomes and take appropriate action based on the balance of probabilities (inc. suspension or revocation). No action / complaint recorded / suspension until disability and equality awareness training / assessment or revocation and refusal to issue another for a lengthy period!

Consider the Statutory Guidance 5.14 (ref: Fit & Proper Person Test) the applicant / licensee should not be given the benefit of the doubt!

Prof Roy Light, *Fit & Proper person: taxi driver licence reviews*, (2023) JoL 36.



IoL Journal of Licensing

- Josef Cannon & Ruchi Parek, *Two public law errors do not new SEV rules make* (2023) 36 JoL
- Leo Charalambides, *Whose adult entertainment is it, anyway?* (2022) 34 JoL
- Jeremy Phillips KC & Michael Feeney, *SEVs and the PSED* (2022) 33 JoL
- Leo Charalambides & Charles Holland, *No sex discussions please, we're British* (2021) 30 JoL
- Leo Charalambides, *Councils need to wake up to their public sector equality duty responsibilities* (2021) 30 JoL



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