

Responses to Council Housing Anti-Social Behaviour Policy 2017

TABLE 1: CONSULTATION EVENT - VERBAL FEEDBACK

Number	Date response received	Comment(s)	Response
1	25-04-2017	<p>Transferring tenants – safety of tenants paramount. Our own policies are a barrier to this method of assistance</p> <p>If tenants are uncomfortable speaking to their neighbour about an issue, are there any tools we can provide to help them do this? Tenant Forum reps to assist on their behalf?</p> <p>Do we have an information sharing protocol? If not, can we introduce one? Data Protection is used as a barrier to sharing information</p>	<p>Sections 8.8-8.10 of BMSDC Allocation Policy 2016 allows for tenants to transfer under gateway in exceptional circumstances despite rent arrears. Each case considered on individual basis. Welfare needs are taken into account.</p> <p>Look at ways to assist individuals with the first contact- We will look to introduce a new leaflet around 'speaking to your neighbour about a complaint' and/or example letters etc. We have also asked the Tenants Forum if they can offer particular support to other tenants experiencing ASB, which is something that could be developed as a procedure.</p> <p>Section 12 of policy reflects tenancy agreement section 1.8 which allows for information sharing with other agencies in order to manage tenancy & housing stock. Every tenant signs the tenancy agreement.</p>
2	25-04-2017	<p>What support is there if our tenants are victims of ASB caused by a tenant of another housing provider, a private tenant or owner occupier?</p> <p>Include a line in the policy on how a person can report ASB caused by a tenant of another housing provider, a private tenant or owner occupier?</p> <p>I am really pleased and encouraged to see the development of an Anti-Social Behaviour Policy. My view is that sharing of information with other agencies as well as have multi-agency 'solution' plans in place for each case.</p> <p>I am also keen to have proactive prevention methods in place</p>	<p>We have added a section into policy which advises individuals how to report ASB if the perpetrator is not a Council tenant – support would be signposted via this group. Please also refer to section 'Anti-social behaviour case review (community trigger)'</p> <p>We strive to improve multi-agency working and recognise we cannot tackle ASB alone.</p> <p>Our main focus of policy is prevention to stop matters</p>

		<p>which may have more positive outcomes on people's quality of life rather than wait until the problem has reached an unresolvable situation.</p> <p>I would like to see this as an evolving policy rather than one set in stone so that the document can respond to changes in legislation, culture and people's needs. It is a very good document, but like any policy, outcomes will measure its success.</p> <p>As a P.F.H (Portfolio Holder for Housing) I would like to see some measure of this policy's success recorded in our performance management reporting mechanism.</p>	<p>escalating, through better prevention and early methods of intervention.</p> <p>Policy includes that it will be reviewed regularly and is a working document.</p> <p>The Housing Management Team is looking to develop a range of performance measure – the measures for this policy will be taken into account as part of this piece of work.</p>
3	25-04-2017	Parking and driving on grass verges. Is this ASB? How can we tackle this?	We have added into the policy under 'what is ASB' driving or parking on public land (including grass verges). We agree that this issue needs to be tackled jointly with Public Realm and we are happy to be included in any consultation when a policy/procedure is developed.
4	25-04-2017	Talking to neighbouring authorities to ensure our policy aligns (St Eds & Forest Heath, IBC) Suffolk Wide Agencies	We sent out consultation documents & feedback requests to all partner agencies with gateway to home choice partnership.
5	25-04-2017	<p><u>Early Intervention</u></p> <p>How much information is shared about potential tenants with housing officers before they are offered a tenancy?</p> <p>I'm not sure how much information is gathered at the Gateway stage – I know what we ask for, but what checks are in place to ensure the information we get is as accurate as possible - this is a separate issue, but for example, I quite often come across tenants who have previously had huge arrears with a private landlord and then end up requiring support when they have arrears with us. This could be, or could have been avoided if flagged up at the stage before tenancy issued. Early intervention has to involve sharing of information with other agencies at pre-sign up/ point of sign up.</p>	<p>Passed as feedback Improvement and Involvement Officer as part of sign up process review, and to Allocations Corporate Manager & Tenant Services Manager</p> <p>For now, we have included two bullets under 'Investigating Anti-Social Behaviour (including prevention and intervention)' which can be elaborated on if required. At this time, we have purposefully left this quite general because it impacts upon other teams.</p>

		<p>Have a risk assessment support matrix - traffic light system - (Enforcement Officer / Tenancy Support Officers). It would be worth talking to IBC as they have ASB officer(s) plus a team of three tenancy support officers who deal with vulnerable tenants immediately after sign up. They have a risk assessment / risk matrix which identifies those tenants at risk of struggling to sustain their tenancy – for whatever reason – this feeds into a traffic light system e.g. Red – TSO will be there at the sign up and for ongoing support. Amber – and so forth. Might be worth talking to <i>[illegible]</i> who manages this and the ASB enforcement team.</p> <p>I would like to be involved in future similar events as sometimes feel out of the loop if it's outside FI (Financial Inclusion) remit.</p>	<p>We will follow this up when we develop a risk assessment.</p> <p>Noted.</p>
6	25-04-17	<p>Very well presented, looking forward to seeing the finalised paper. Making tenants aware of what we will and won't deal with as a Council will really benefit us, ensuring resources are used efficiently.</p> <p>If you were to close a case would a tenant be able to appeal the decision if they feel it is not resolved?</p>	<p>We have amended the policy under 'closing cases' stating if a complainant does not feel their complaint has been resolved satisfactorily, they may provide additional information to us which has not already been considered, otherwise the next step is 'making a complaint about the service'.</p>
7	25-04-17	<p>Stage 1 offers significant opportunity for small intervention to prevent progression to stage 2 and beyond. Many people feel ill equipped to have even a straightforward conversation with a stranger. Where we have no knowledge of another person our "risk averse" brains will fill in the blanks often exaggerating concern on who/what they are.</p> <p>Making initial introductions of tenant to tenant and offering some kind of support in having early conversations about neighbour issues might be worth thinking about.</p> <p>P.s good presentation, great to be consulted – thanks guys.</p> <p>Packed full of info – really focused and plenty of opportunity for all to contribute.</p>	<p>Great suggestion but at this time unfortunately we don't have the resources to introduce new tenants to existing tenants/residents. We will however look to provide tenants with the tools to manage their own problems in the first instance. See TABLE 1: point 1.</p>

8	25-04-17	<p>Good to see domestic abuse and home safety referenced.</p> <p>Would be keen to see more detail or know what assessments of risk there will be for property hardening in terms of how/which works are undertaken.</p> <p>Good to see reference and importance of multi-agency working to unpick complex cases where tenants/families are involved in complex cases.</p> <p>May be worth referencing other safeguarding issues, whereby an incidence of ASB is investigated but uncovers another issue such as abuse or neglect. The necessary referrals are made to safeguard those who may be vulnerable.</p>	<p>We hold a small budget for property hardening if a request is received from a Council tenant, we make a referral for a risk assessment to be carried out by an external company/ organisation called Safe Partnership (details added to policy) and they propose works that we should carry out.</p> <p>Information has been added to the section 'supporting witnesses, victims and perpetrators' around safeguarding.</p>
9	25-04-17	<p>7.3.1 Social Care</p> <p>Please consider removing social care and replace with 'Children and Young Peoples Services' and 'Adult and Community Services'.</p>	<p>All references to social care have been amended as suggested.</p>
10	25-04-17	<p>Very well informed presentation and well delivered. Have completed post it notes regarding early intervention and prevention and partner agency.</p> <p>Well put together, concise and clear.</p>	<p>No action required.</p>
11	25-04-17	<p>I think it's really worth investing more time and effort in prevention. As a mediator, cases often come to us relatively late and things have escalated. It's often quite easy to draw a line back to the things that could have helped or prevented the situation. One simple thing that could happen, if you want people to be able to take on their own problems in the first instance is to introduce them to each other when they first move in and open the lines of communication. Many people I work with have never spoken to each other. Pre-empting complaints, knowing where the problems might occur and suggesting avenues for sorting things out in advance might be useful.</p> <p>Just generally, it's really good to offer mediation at the earliest possible stage before problems and complaints stack up. In some ways though I think you can act even earlier than that</p>	<p>We note that we could make referrals earlier, to be considered when procedures being drafted.</p>

		and pre-empt problems which would hopefully reduce complaints to some extent.	
12	25-04-17	<p>There should be just one phone number or point of contact to the Council (e.g. noise - internal comms streamlined).</p> <p>Are we consulting with (not just “working with”): (for example)</p> <ul style="list-style-type: none"> -Police -SCC (ACS/CYPS) -NSFT -Housing Associations -Professional Bodies and Associations (e.g. CIH?) -Members -PCs/TCs? -Tenants etc..... <p>[How do we work with them for anonymity?]</p> <p>Is our interpretation /definition <i>[of ASB]</i> consistent with other partners (esp Police)</p> <p>How do we “mediate”, e.g. “reasonable”, “proportionate”?</p>	<p>We have added a section at the end of the policy ‘how to contact us’ & we have recorded the one contact number for the Councils.</p> <p>We have included partner agencies in our consultation event and in development of the policy.</p> <p>We have an information sharing section in the tenancy agreement and in the policy which allows for us to work with other agencies.</p> <p>We refer to an external mediation agency called Catch22.</p>

TABLE 2: CONSULTATION EVENT - WORKSHOP

Table 2a) Have we missed anything?

Number	Date response received	Comment(s)	Response
1	25-04-2017	Perhaps some reference to Community Safety Partnership groups. Some routes to communication are already working.	We have included reference to Community Safety Partnerships.

Table 2b) How can we support victims, witnesses and perpetrators?

Number	Date response received	Comment(s)	Response
1	25-04-2017	Tell them about local groups/support networks.	We will signpost people as appropriate.
2	25-04-2017	Ensure we know (with permission) about other agencies involved in the family.	Passed to Improvement and Involvement Officer for potential inclusion in sign up process 'information obtained'.

Table 2c) How do we make early intervention work? How do we work with our partners to achieve this?

Number	Date response received	Comment(s)	Response
1	25-04-2017	Formally introducing a new tenant to their neighbour and their community can help to create the sense of belonging and immediately reduce opportunities for poor or no communication. We have worked numbers of cases where tenants have never met their new neighbours.	See TABLE 1: point 1.
2	25-04-2017	Is there something we can offer to support people at Stage 1 to actually have a conversation with their neighbour. Not full blown mediation but some way of making it feel less "risky" to have a conversation.	See TABLE 1: point 1.
3	25-04-2017	I think with early intervention this should be by way of actual visit to both parties. They can ignore or not open a letter.	Each case will be considered on an individual basis- not to be included in policy.
4	25-04-2017	Early intervention working with partners – this could be aided by a degree of co-location to encourage informal responses.	Feedback sent to Tenant Services Manager.
5	25-04-2017	Working with partners to achieve early intervention – this may be aided by officers becoming more agile and therefore better placed	Feedback sent to Tenant Services Manager.

		to respond “on the spot”.	With the upcoming location changes we are looking at agile working to better fulfil the role.
6	25-04-2017	Do we need to increase number of Mid Suffolk info sharing meetings? Do we need to include in the MS meetings the role of each agency – particularly when new to meeting to gain greater understanding of roles and limits.	Feedback passed to Communities Officer (Safe) at Multi-agency ASB Meeting of 17/05/2017.
7	25-04-2017	Fundamentally housing can be well designed and well built to avoid much of the ASB that now occurs. Paper thin walls and lack of outside space etc. are obvious problems waiting to happen.	Noted.
8	25-04-2017	Early intervention – Do we need to put together a ‘pool’ of early intervention/divisionary activities that everyone can dip into.	Feedback sent to Tenant Services Manager.
9	25-04-2017	Regular sharing info sessions with partners.	Noted.
10	25-04-2017	? Resettlement officer supporting homeless? people during 1 st year of new tenancies?	We note that if this new role were to be brought in it would be a benefit to the team and we would ensure we worked closely with the officer.
11	25-04-2017	New council developments – look at design, location of properties and tenants to avoid ‘communities’ within ‘communities’. Also when tenants are introduced into mixed use new housing – incorporate when owner/occupiers move in so avoid barriers.	Pass to Development (Housing & Regeneration) Manager.
12	25-04-2017	Introducing tenants to each other when they move in would help significantly in encouraging tenants to approach neighbours themselves. Most of the cases I see would not have the confidence to do this as things stand.	See TABLE 2: point 1.
13	25-04-2017	Some kind of tenant induction where you talk about the possible problems, ways of problem solving and the effects of ASB on others could be really useful. Could be connected to some kind of facilitation of more active positive community. Most people want to be more connected. It seems worth investing in.	This has been passed to Improvement and Involvement Officer as part of project looking at sign up process

TABLE 3: FORMAL POLICY CONSULTATION: OTHER FORMAT

Number of individuals who responded = 10

Number	Date response received	Comment(s)	Response
1	10-05-2017	7.2.1 two typos: 'bene' should be 'been'. remove 'the' from we will risk assess and prioritise every complaint.	Amended
2	28-04-2017	I understand the reason behind the noise diaries but could you tell me why people have to keep it going for more than two years? Surely this is not necessary for so long when nothing else is done.	When we ask complainants to records incidents of ASB on nuisance log sheets, we ask the complainant to keep records for 2 weeks in the first instance and then continue to monitor if required after this for up to three months, The use of log sheets is to give housing officers an idea of what the problem, is, how persistent the problem is, and if there are any witnesses to any alleged nuisance behaviour. If upon receipt of log sheets there isn't thought to be a problem, this is normally when we look to close a case. If however there is a substantiated claim of ASB, and it is thought there may be a breach of tenancy conditions, further action may be required, at which point this would be progressed by the housing officer.

3	9-05-2017	<p>Page 1 1.0 Introduction Forth para last line insert 'as'</p> <p>Page 5 Hate Crime Can Hate crime be reported in other ways? Suffolk County Council, Suffolk Racial Equality council etc</p> <p>Should we insert links or contact email addresses/telephone numbers</p> <p>Page 5 Domestic Violence Can we insert ways to report domestic violence</p> <p>Page 5 4.3 What is not anti-social behaviour Can we think about an alternative title? Just doesn't seem right – not sure what alternative is</p> <p>Page 5 4.3 What is not anti-social behaviour The first six bullet points (whilst we are referring to these not being ASB that we would deal with). We need to ensure that we have sufficient safe guards should a perpetrator be carrying out these acts deliberately, possibly repetitively to cause upset or distress?</p> <p>Page 5 4.4 Complaints the Council will note lead on Do we need to refer to Tenant Services rather than the council?</p> <p>Parking illegally or inconsiderately – we would have to deal with this if</p>	<p>Amended</p> <p>The Suffolk Hate Crime Service is now closed however.</p> <p>We have added a link to Suffolk Constabulary where hate crime can be reported https://www.suffolk.police.uk/about-us/our-policies/hate-crime</p> <p>We have also made it clear that people can also report hate crime anonymously through Crime Stoppers https://crimestoppers-uk.org/give-information/how-to-give-information/</p> <p>In the Policy, we have replaced the wording domestic violence with domestic abuse and violence.</p> <p>We have added further information about ways to report domestic abuse.</p> <p>We have changed the title of this section to 'what is not considered to be anti-social behaviour'</p> <p>Under 'what does the term anti-social behaviour mean' 'anti-social behaviour is described as but not limited to', we have added a bullet point 'deliberate acts to antagonise or cause harassment, alarm or distress which can be proven and are to antagonise or cause harassment, alarm or distress, this could include acts not normally considered.</p> <p>We have amended the title to say 'Complaints that Tenant Services will not lead on include:'</p> <p>We have changed the reference to parking in the policy to</p>
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4	22-05-2017	<p>Discussion regarding ASB Questionnaire answered from draft policy. Members that agreed to go to consultation were not able to make it. So response is based purely on the draft policy.</p> <p>Policy was fine but would like plain English more</p> <p>The draft seems very detached so would like to encourage Tenants helping Tenants more</p> <p>How effective is the multi-agency approach? Very fine line between all concerned to support everyone.</p> <p>Tenant support officers to be more available to Tenants.</p>	<p>As we have a final read through once the policy has been approved by our internal committee structure, we will ask an independent person to assess plain English.</p> <p>We will signpost people to support services where appropriate. We have passed feedback to the Tenants Forum stating the following</p> <p>'We agree that tenants could be a form of support for one another, when experiencing anti-social behaviour or being a perpetrator of anti-social behaviour. If the tenant's forum members can offer particular support to other tenants experiencing ASB, this is something that could be developed as a procedure i.e. we could direct individuals to tenants forum representatives. We don't want to promise something on behalf of the tenant's forum however without this first being discussed and agreed as a procedure. Could this be a discussion point at the next tenants' forum meeting?'</p> <p>We will strive to work more effectively with other agencies to jointly tackle a problem.</p> <p>One of the aims of this policy is to make ourselves more available to the people who need us the most. We are also trying to make it easier for people to report ASB and will do all we can to support victims, witnesses and perpetrators.</p> <p>Log sheets are used to monitor ASB reported to give us an idea of the type of problem and the frequency of the issue reported. These can be used as evidence for further action or in court. We monitor for up to three months.</p>
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		<p>Noise level equipment. Diaries, what are done with them and how long to noise victims have to write them</p> <p>Who is the mediation team? Are they independent?</p>	<p>Environmental Protection has their own log sheets to monitor noise; they have a different policy.</p> <p>Mediation is currently provided by Catch 22 who is an independent organisation. This detail has been added to the policy.</p>
5	11-05-2017	<p>Page 3 – 1.0 Introduction (para 2) Where you mention tenants, lessees, shared owners etc. should you include owner/occupiers and privately rented as they are also affected – even though the document is a Policy about Council tenants.</p> <p>Page 3 (Para 4) - Just needs a comma after action and before however. Also needs 'as' added after the word eviction.</p> <p>Page 3 (Para 5) – We recognise we cannot resolve all cases of ASB in the districts amongst our tenants without the support and assistance of other.....raising expectation that you will be able resolve all ASB cases. May be better to say...'We recognise we cannot strive to resolve (all) Is it All cases? cases of ASB.</p> <p>Page 3 (Para 5) -to importance on our working relationship with our partners. Doesn't quite make sense. Do you mean to say: Therefore, we will enhance and develop our working relationship with our partners' or: Therefore we will enhance and develop our partnership working.</p> <p>Page 3 Objectives. Where it says: Provide advice, support and regular updates to complainants, victims and witnesses. You may want to include something about Provide advice, support and regular updates to complainants, victims and witnesses in accordance with the Data Protection Act (reason being there may be times when you aren't able to provide the victim/witnesses with all the info i.e. Police criminal proceeding pending etc.)</p> <p>Page 4 – 4.2 What does the term anti-social behaviour mean? Where you have described anti-social behaviour and the list, you should make reference at the bottom of the page as to what and where in the Government legislation document this has been taken from.</p>	<p>We have changed this to say 'number of people within our communities' which covers any individual who may be affected by ASB.</p> <p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Amended</p> <p>This list of ASB is from our own knowledge and various information sources. We have made it clear this is a list we have defined.</p>

		<p>Page 4 – Harassment and intimidation – where you make reference to (including children), do you want to add (including children and any other family members). As in some cases where there are Sisters, Grandparents etc. living in the property also it just explains and reinforces the message.</p> <p>Page 5 – Domestic Violence. Can you change the title to Domestic Violence and Domestic Abuse to highlight they are two different things.</p> <p>Page 5 Domestic Violence – (para 2) where you refer to the definition, you will need to make a reference at the bottom of the page as to where this definition came from.</p> <p>Page 5 – Domestic Violence (para 3) – Can you add indomestic violence and domestic abuse seriously and we will deal etc.</p> <p>Page 5 – What is not anti-social behaviour? Do you want to make the letters Anti-Social Behaviour in bold as refer to ASB throughout the document?</p> <p>Page 5 – What is not anti-social behaviour? Do you want to rephrase: Examples of issues which may upset or disturb people but which cannot be dealt with as ASB are: to Examples of issues which may upset or disturb people and ('and' rather than 'but' as doesn't sound so negative) are not considered ASB are:</p> <p>Page 5 – What is not anti-social behaviour – Children playing. Can you extend that to say children playing including ball games. Do you also want to add in: People carrying out DIY jobs unless at unreasonable hours (still relevant to Council tenants as maybe putting up shelves, building furniture etc.</p> <p>Page 7 – Tenant responsibilities. Where you have talked about stages of Case Management, is this Policy document going to be read by tenants? Reason is that Stage 1: Resolving the situation within the community - the tense has changed. Previously written 'we will</p>	<p>Amended</p> <p>Amended</p> <p>A reference has been included.</p> <p>Amended</p> <p>Amended</p> <p>Amended</p> <p>These suggestions have been included.</p> <p>We have re-written this to the third person.</p>
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	<p>provide every tenant etc.)’ Now says ‘Before reporting ASB or nuisance behaviour to us, and only if you feel it is safe to do so..... Does this need to be re written for the Policy to say ...Before reporting ASB or nuisance behaviour to the Council, and only if it is safe to do so, the tenant should first try to talk to their neighbour..... Same with Stage 2.</p> <p>Page 7 – Stage 2 – Reporting and assessing a complaint – Final paragraph. If we do not feel a complaint constitutes....sounds a bit unsure. Maybe better to write If a complaint does not constitute ASB or falls outside of our remit as a landlord.</p> <p>Page 7 – Stage 2 – Reporting and assessing a complaint - Final paragraph. Where you say you will write to the complainant to outline the reason(s) why we will not progress a complaint. Aside from cases which do not constitute ASB because it is considered day to day living, will you include in the letter signposting to other agencies/organisations which may be able to offer help and support? Reason is people could be left ‘hanging’ and then will probably contact Police who will say Council investigate. Concern people will be ‘bounced’ backwards and forwards between agencies. Could signpost or include say a leaflet on what to do if the problem is ball games etc. May want to look at putting together some ‘self-help’ guides/leaflets, particularly as you refer in the Policy to wanting residents to take responsibility for their own lives and to resolve their own problems.</p> <p>Page 8 - 7.2.1 Response times. Once a substantiated complaint of alleged ASB is received. What do you mean by substantiated? What does this involve and by who? How long will it take? Would it be better to remove the word substantiated and say: Once a complaint of alleged ASB is received and it is deemed as ASB and determined as reasonable and proportionate to conclude.....</p> <p>Page 8 – 7.2.1 Response times - ...has bene conducting ASB. Just a spelling thing - should say been.</p> <p>Page 8 – 7.2.1 Response times. We will: Notify the alleged perpetrator when a complaint has been made, either by telephone, in writing or in person; You need to say that you will not divulge the name of the person making the complaint. Also, Keep all parties to a complaint informed of key developments and progress on the case.</p>	<p>Amended</p> <p>On the reverse of the letter we have included information about other agencies who may be able to help. If we contact a person by telephone or see them in person we will pass the same information to them. In the future we will look at introducing more information leaflets to support our policy on managing ASB.</p> <p>Substantiated, means it fits with our definition of what ASB is. If it falls outside of our remit or is not considered to be ASB then it is unsubstantiated. We will reword this section so it is clear who makes the decision and how long this will take.</p> <p>Amended</p> <p>Amended</p>
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		<p>Do you want to add 'in accordance with the Data Protection Act (reason being there may be times when you aren't able to provide the victim/witnesses with all the info i.e. Police criminal proceeding pending etc.).</p> <p>Page 8 – 7.3 Stage 3 – Investigating anti-social behaviour. Again do you want to put Anti-Social Behaviour as abbreviation ASB used throughout the document.</p> <p>Page 8 – 7.3 Stage 3 – Investigating anti-social behaviour. If it appears that a tenant has broken their tenancy.... May be better to say If it appears that a tenant has breached their tenancy....</p> <p>Page 8 – 7.3 Stage 3 – Investigating anti-social behaviour. We will: We will need the help and cooperation of complainants to keep detailed records..... Final sentence - To comply with RIPA, (remove',') and the Human Rights Act, we will always inform a tenant when monitoring is being carried out. Add in the word 'noise' sowhen noise monitoring is being carried out.</p> <p>Page 8 – 7.3.1 Prevention and intervention. Do you want to add in the word independent to say..the use of professional independent dispute resolution/mediation.</p> <p>Page 8 – 7.3.1 Prevention and intervention. Do you want to add 2 extra preventative measures i.e. signposting to other agencies/organisations and self – help guides/leaflets (i.e. dealing with ball games etc.)</p> <p>Page 9 – We will take a multi-agency approach...Can you change Mid Suffolk & Babergh Community Safety Team (Local Authority ASB coordinator) to Mid Suffolk & Babergh Communities Officer (Safe).</p> <p>Page 9 – We will take a multi-agency approach... Can you add to Social Care – Adult and Children, Schools, SCC Early Help, Children and Young Peoples services (CYP), Adult and Community Services (ACS), SCC Local Area Co-ordinators (LACS) and Housing Associations.</p> <p>Page 9 – 7.3.2 Formal action and legal remedies – In the paragraph where you mention community protection notices, you may want to</p>	<p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Included</p> <p>Amended</p> <p>Included</p> <p>Amended</p>
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	<p>put capital letters at the start of each of the word i.e. Community Protection Notices (CPN). Same as criminal behaviour orders i.e. Criminal Behaviour Orders CBO). Same as public space protection orders Public Space Protection Orders (PSPO).</p> <p>Page 9 – 7.4 Stage 4 – Closing a case. You mention when you will close a case i.e. being resolved, evidence behaviour has stopped etc. Do you want to add in there...something about closing a case i.e. We will close a case in consultation with a complainant(s) where following an investigation using the tools and powers to tackle ASB have been unsuccessful and the ASB remains unresolved, independent dispute resolution/mediation has been offered and refused.</p> <p>Page 9 – 8.0 Supporting victims, witnesses and perpetrators – Respect the confidentiality of victims and witnesses and keep them fully informed of key developments...you may want to add 'in accordance with the Data Protection Act' (reason being there may be times when you aren't able to provide the victim/witnesses with all the info i.e. Police criminal proceeding pending etc.)</p> <p>Page 9 – 8.0 Supporting victims, witnesses and perpetrators – Always be honest and realistic about the likely outcome of a case....do you want to add in something about managing expectations i.e. Manage expectations by always being honest and realistic about the likely outcome of a case.</p> <p>Page 10 – 9.0 Home safety – Can you remove ...and safe rooms as these are costly, rarely installed for a number of reasons including suitability of property, persons circumstances etc.</p> <p>Page 11 – Information sharing and confidentiality – Change of tense. Written as if the tenant will be reading the document. Needs to say something about tenants signing a declaration on the tenancy which gives permission etc. (you may want to write in what your declaration actually says). You will need to be more specific about who you may need to share information with not....share with others such as.....</p> <p>Page 11 – Information sharing and confidentiality – Assisting statutory agencies to do their job – very vague with the phrase ...do their job. May raise concern that any information is shared with any statutory agency. Needs to be rephrased to – used lawfully and fairly for limited, specifically stated purposes in a way that is adequate,</p>	<p>Amended</p> <p>Amended</p> <p>Amended</p> <p>Reference to safe rooms has been removed.</p> <p>This section has been amended. It already includes the wording of the Tenancy Agreement.</p> <p>This phrase was taken word for word from the Tenancy Agreement. It is vague because it covers the management of a Tenancy in its entirety. We have added some further details to this section to make it clearer how we will share information and why.</p>
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	<p>relevant and not excessive.</p> <p>Page 11 – Information sharing and confidentiality – Safeguarding children.....add in and adults.</p> <p>Page 11 – Information sharing and confidentiality – Add in... Apprehension or prosecution of offenders.</p> <p>Under the Data Protection (1998) - Change of tense. You have said right to see information about you.....Need to say about the tenant. However, you may want to speak to our DPA/FIO officer as under a request some information would be exempt and could not be disclosed if the person making a FIO request was currently under investigation for ASB which involved criminal proceedings.</p> <p>Page 11 – Use of technology – The team will make the use of any available... need to remove the word ‘the’. Also made reference to CCTV. Do we still use CCTV as this is not something we use in the Communities Team and we no longer have mobile CCTV. May raise expectations?</p> <p>Page 11 – Monitoring and policy review – Mention of number of ASB cases. Are you going to expand monitoring to include – Number of ASB cases investigated and closed, Number of referrals that do not constitute ASB.</p> <p>We are still unclear at this time what we need to monitor, and why. Further work will be carried out for this section.</p> <p>Page 11 – Monitoring and policy review – We will monitor the following: Number of NoSPs served – although you have a glossary of terms on the back it may be better to put Number of Notice of Seeking</p>	<p>Amended</p> <p>Included</p> <p>Amended</p> <p>Reference to CCTV has been removed. If this is available to us in the future we can add this in.</p> <p>We will monitor the following:</p> <ul style="list-style-type: none"> • Satisfaction feedback surveys; • Number of ASB cases accepted; • Number of tenancy warnings issues (initial & final warnings); • Number of Notice of Seeking Possessions served; • Number of Notice to Quits served; • Number of Section 128 Notice of Possession Proceedings served; • Number of full and suspended possession orders made; • Number of evictions. <p>Also see TABLE 1, point 2.</p> <p>Amended</p>
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	<p>Possession (NoSP). Same with NTQ served.</p> <p>Page 11 – Making a complaint about the service – need to remove the word ‘they’ are directed</p> <p>General feedback</p> <p>As you have made reference to people doing more for themselves and early intervention/prevention I would like to see included in the policy clarification around what someone would do if the Council will not investigate i.e. problems with ball games, parking issues (not obstructing a driveway) i.e. more about signposting, who would signpost (Housing Officers?) and who to?</p> <p>Would there be a list of agencies/organisations that Housing Officers can refer to. Also in order that people can do more for themselves and so they know how, the production and inclusion of some self-help guides/leaflets as appendices into the Policy which can also be made available on the website etc.</p> <p>Finally, although this has been written specifically as an ASB Policy for Council tenants, I would like to recommend that the same rules and approach are applied in relation to what is considered ASB and what will and will not be investigated for all types of tenure. One Policy should be developed and adopted across both Councils as the ASB Policy to ensure consistency of approach to ASB for all types of tenure including owner/occupiers and privately rented.</p>	<p>Amended</p> <p>We have added clarification into the policy (when a complaint is not ASB/won't be accepted) stating that we will sign post complainants to other services or agencies where appropriate, and to other sources of information which may be of help. If we do write to people to notify them a complaint will not be accepted, there is information about other agencies who may be able to help in the back of the letter. I have made it clear that Housing Officers will signpost.</p> <p>We will in the future produce leaflets / procedures to support this policy.</p> <p>Agreed.</p>
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TABLE 4: FORMAL POLICY CONSULTATION: RESPONSE FORMS

Table 4a) Is the policy easy to read and understand? If not, please state the areas in which this could be improved

Number	Comment(s)	Response
1	Yes, some big words and it maybe that you have no choice but to use them but they may confuse some tenants	Noted. We will ask someone to read the final document for plain English check.
2	I found it easy to read and understand. A bit lengthy for a wider public audience.	Noted
3	Yes, it is – but this is from an internal perspective. Please could we get somebody from outside the organization to look at it, and especially tenants.	We have included external organisations, and members of the Tenants Forum in the formal policy consultation.
4	Easy to read and clearly set out. However in the 5th paragraph of the Introduction there is an error where it says, “we will continue to importance”. I think the work improved was what was intended for that area.	We have made this change.
5	It is for me but I’m a Housing Lawyer. Overall, I wonder how many tenants will actually read it all.	Noted.

Table 4b) Is there anything in this policy which you disagree with? If yes how do you think this could be changed?

Number	Comment(s)	Response
1	As we now have a single website cannot the links be the same to access forms etc?	Although we have a single website platform, there are still two different web addresses www.babergh.gov.uk and www.midsuffolk.gov.uk that link customers to this. Once Councillors have made a decision about the branding of the Council and when we have a single web address, we will update the policy.
	<p>Para 4.2 I have no objection to Housing Officers passing noise complaints to us to deal with if they have been screened first i.e. it has been established that the noise being complained of is not of the type listed in the examples they have provided. I feel that receiving such referrals from Housing Officers would provide them with an opportunity to provide us with tenant details, and any other information that we should be aware of, and keeps them ‘in the loop’ with regard to potential tenancy issues.</p> <p>I think that the initial paragraph on ‘noise nuisance’ on page 4 could do with further information about what types of noise might be noise nuisance, or should include a direct reference to paragraph 4.3 identifying examples of noise which is not a nuisance.</p>	<p>We maintain that noise complaints in the first instance should to go Environmental Protection (EP) irrespective of the tenure of the perpetrator – if during the course of dealing with the complaint, tenancy issues are raised, we will liaise with the EP Officer and share information. We have made it clear in the policy that statutory noise nuisance is ASB, but, that we will not lead on noise complaints.</p> <p>We will include further detail about what is considered a noise nuisance.</p>

	<p>Para 4.4 Complaints that the Council will not lead on: fly-tipping. The Council will deal with fly tipping but not the Community Housing Team.</p> <p>Para 5.1 Needs to be amended so that the reference to the EPA 1990 is not limited to noise nuisance only (other potential nuisances)</p> <p>Para 7.1 could signpost tenants to the template noise letters on our website.</p>	<p>We have amended the title to state complaints that Tenant Services will not lead on.</p> <p>This paragraph has been amended.</p> <p>Thank you for this helpful suggestion – we have added information and a link to our website</p>
	<p>Overall there is a general feel of the policy encouraging residents to live in harmony with one another and take responsibility for this. This is a good thing and that is what we all encourage our residents to do but it does not send a message of zero tolerance from the Council as an organisation in dealing with people who choose to make other people's life unbearable as a result of ASB. This I picked from sections such as the aims, Prevention & Intervention. You listed moving the perpetrator or victim via a property transfer as one of your preventative measures. This appears to be sending a message of a rewarding the perpetrator or giving another counteractive assurance to residents that they can be moved by transfer if they are encountering problems with their neighbours. While I understand that this can occasionally happen in-house, I believe the message should be shifted a bit we as an organisation take ASB seriously and will deal with perpetrators appropriately as everyone has the right to the enjoyment of their homes.</p>	<p>We want it to be clear that we take a zero tolerance to anti-social behaviour, therefore we have updated our aims to reflect this, section 7.3.2 , 7.3.1.</p>
	<p>Paragraph 17 doesn't refer to Possession Proceedings and other Legal remedies. Maybe it's not meant to.</p> <p>Paragraph 7.2.1. contains the words: "every the complaint". Surely this is a typo.</p>	<p>Possession proceedings and other legal remedies are mentioned under 7.3.2.</p> <p>Amended.</p>

Table 4c) How can we better support victims, witnesses and perpetrators of anti-social behaviour?

Number	Comment(s)	Response
1	Be clear at the start what can be done, who by and by when.	Noted.
2	By being honest and professional. Don't over-promise and under-delivery.	Noted. We aim to be honest and realistic.
3	This area is covered well however consideration needs to be given that parking illegally or inconsiderately could be something that Housing team may need to intervene because it could lead to assault or something more serious.	We have updated our policy to state we will deal with illegal or inconsiderate parking within the confines of a tenancy boundary. If any other ASB takes place linked to an original complaint of parking, this will be dealt with in line with a policy.
4	You couldn't. Few resources deal with many complaints admirably.	Noted.

Table 4d) How do we make early intervention work? How can we work with our partners more effectively to achieve this?

Number	Comment(s)	Response
1	We should press on with the Early Help offer work that is underway. If you need me to support this, let me know	Noted.
2	This section is well covered.	Noted.
3	I don't know. I've only ever attended one multi-agency meeting. Perhaps you should include one of your Lawyers on inter-agency ASB meetings	We asked the chair of the Multi-agency ASB Meeting (Communities Officer – Safe) on 17/05/17 to include Legal on the invite for multi-agency meetings.

Table 4e) Have we missed anything?

Number	Comment(s)	Response
1	Very comprehensive, can't think of anything that has been missed.	Noted.
2	No.	Noted.

Table 4f) Do you have any other comments, feedback or questions?

Number	Comment(s)	Response
1	<p>7.2 do you always need to write to an individual to tell them it will not be accepted as a complaint? Or will a phone call or initial conversation do, are you setting yourselves up to fail because you haven't written?</p> <p>7.2.1 – typo on second line “Bene” should be “Been”</p> <p>7.2.1 Line 3 – extra “the” between every and complain</p> <p>7.3 what does RIPA mean? Explained at the end but doesn't it and any other acronyms need to be explained where they are?</p> <p>Are you promising too much? Can you do all of this?</p>	<p>This is a good point. We will include in the policy that we notify the complainant by telephone, in writing or in person.</p> <p>Amended.</p> <p>Amended.</p> <p>We have amended this sentence so it records the full name of the piece of legislation. It is explained in more details prior to this, under section 5.1. RIPA is also included in the Glossary at the end.</p> <p>We aim to have a clear, robust and comprehensive policy for managing ASB – nothing in the policy is unachievable with effective management and if we all work together.</p>
2	Very good policy and easy to follow. Would just need to be tweaked a bit to send a strong message of how the Council stands as an organisation in ensuring people live in peace and harmony to have utmost enjoyment of their homes.	We have amended the policy with the aim of sending out a stronger message that ASB will not be tolerated and that we will take action against perpetrators of ASB without hesitation.