

Introduction

g15 welcomes the opportunity to contribute to the Home Office review of antisocial behaviour. We are pleased to be able to comment on the Home Office plans for more effective responses to antisocial behaviour and to take this opportunity to set out our own plans as they relate to housing more generally.

Whilst we welcome a review of antisocial behaviour enforcement tools and powers, we feel that there are already some useful arrangements in place to tackle antisocial behaviour.

We feel that we can make a positive difference and can be a driving force for positive change and improvement in this context. Our hope is that we can continue to work with the Home Office and other key partners to implement more effective responses to antisocial behaviour over the coming years and trust that this response helps shape the Home Office approach whilst also providing a clear explanation about our own plans to reduce and tackle antisocial behaviour across London.

Who we are

g15 is a grouping of the 15 largest independent housing associations in London. We collaborate at a number of levels to create balanced and sustainable communities throughout London; communities where people are proud to live, now and in the future. The common purpose of the g15 is to build diverse and sustainable communities, places where people want to live now and in the future.

To this end, we combine our housing work with a variety of innovative community and economic development programmes. We build between 14,000–15,000 new homes every year and invest over £25m annually in economic and community development to create thriving, sustainable neighbourhoods across the capital. g15 comprises the following members:

A2 Dominion Group	Metropolitan Housing Trust
Affinity Sutton	Notting Hill Housing
AmicusHorizon Group	Network Housing Group
Catalyst Housing Group	Peabody
Circle Anglia	Southern Housing Group
East Thames Group	The Hyde Group
Family Mosaic	The L&Q Group
Genesis Group	

Some facts and context

Collectively, the g15 house around one in ten Londoners and manage more than half a million homes. In 2009/10, we made about 8,500 lettings across London, which represented nearly 50% of all lettings by housing associations in the capital. Of these, 71% were allocated to Londoners on local authority waiting lists.

Our commitment to London means we actively seek to participate in key strategic issues affecting the capital, including mobility, new build supply, social and economic regeneration, reducing antisocial behaviour and homelessness. We have worked in partnership with the Police, London boroughs and other partners over the past few years to reduce the level of antisocial behaviour in London.

Our community safety staff meet as the London Housing Antisocial Behaviour Group (LonHAG)

LonHAG exists to:

- Share areas of good practice.
- Invite guest speakers to help the group identify new initiatives and stimulate debate on areas of common interest.
- Identify areas of concern and identify appropriate responses
- Undertake comparison benchmarking exercises
- Carry out specific pieces of work which are of a common concern and invest in research and development as appropriate or as directed by the G15 Director's group
- Promote the work of the group and attend liaison or representative meetings and participate in discussions which support Registered Providers of social housing and the way forward in addressing anti-social behaviour (ASB).
- To work with Crime and Disorder Reduction Partnerships (CDRPs) to ensure Registered Providers of social housing are fully represented
- To lobby for changes in legislation.
- To respond to government and other consultations on anti-social behaviour, crime and community safety.

A summary of the key points in our response

- We support a review of tools and powers to tackle antisocial behaviour; however have concerns that our widest and most successful tool, the Antisocial Behaviour Injunction (ASBI) benefits will be lost.
- We welcome recognition that Registered Providers of social housing (RPs) have a key role in tackling antisocial behaviour alongside our statutory partners in local authorities, police and other agencies. Whilst the review document considers a multi-agency context, we feel it is important to stress the unique role that Registered Providers of social housing have via tenancy contracts with individuals.
- We believe that the g15 has a key role to play in working towards a consistent response to ASB. We have a good history of working with local authorities and police and we look forward to continuing and expanding our partnerships.
- We encourage the Home Office to continue the dialogue with G15 organisations and other Registered Providers of social housing as the detail of new tools evolve. We are very concerned about the proposal to repeal the ASBI (ASB Injunction) and would ask that this proposal is re-considered. From our experience, this tool is swift, value for money and effective. We welcome the opportunity for injunctive powers to be available to other partner agencies; however we would ask that consideration is given to retaining the ASBI alongside the newly proposed powers. Member organisations of g15 use this tool extensively. This is important in ensuring the benefits of the existing ASB Injunctions in particular are not lost. We are pleased that the Home Office recognises the benefits and need to act quickly to address ASB.
- We welcome exploration into how residents can be more involved in designing ASB policies, procedures and initiatives. We have concerns about the "Community Trigger" and we believe the sector needs further clarification and guidance on how this might operation successfully, to avoid it being open to abuse and disadvantaging vulnerable sections of the community.
- We welcome the consideration of tools and powers that can be used by a variety of agencies, however we would like clarification of responsibilities to ensure all agencies are clear of the lead in taking a certain action.

In light of announced reductions in public funds allocated to tackling ASB within local government and recently announced cuts to staffing within Environmental Health, Community Safety and ASB Units, we are keen to ensure a strong partnership approach continues, with each partner (RP,

Local Authority, Police and other relevant agencies) having the opportunity to bring their own tools to the table to address the ASB issue.

Set out below are the g15 responses to specific questions in the Home Office consultation on 'More effective responses to antisocial behaviour.'

Reforming the Toolkit

1. **Question 1 - Do you think that the proposed changes will make a difference to tackling antisocial behaviour? Please explain your answer to question 1.**

- 1.1 g15 believes that the reforms will not make a difference to tackling ASB and that the problem will be the same.
- 1.2 The group noted that there is not much practical advice, details or specifics as to how these proposed powers will be used. We recommend that further consideration is given to detail of how these tools will function in practice.
- 1.3 In addition Registered Providers will be especially worried about multi agency working and the 'community trigger' and how this will deliver equitable services across organisations who work within multiple boroughs and regions.
- 1.4 There are also concerns by Registered Providers as to the lack of clearly defined accountability and responsibilities between agencies and who will pay costs.

2. **Question 2 - Do you think there are other tools and powers for dealing with anti-social behaviour that should be repealed?**

- 2.1 g15 believes that some powers, such as Parenting Orders and Individual Support Orders are not well used and so the impact of their removal will have less consequence.
- 2.2 However, we strongly believe in the usefulness, relative low costs and speed of Housing Anti-Social Behaviour injunctions (ASBIs) and would recommend their retention. If Housing Injunctions are not retained, then any new powers must replicate their effectiveness.

3. **Question 3 - Overall, do you agree / disagree that the new proposals will lower bureaucracy making it quicker for the police or local agencies to act to protect victims and communities**

- 3.1 We disagree. Bureaucracy may increase or be transferred to different agencies, for pursuing orders that combine both mandatory and prohibitive conditions.

3a **Question 3a – Do you agree or disagree that the new proposals will allow a flexible approach to tackle specific local issues**

- 3.2 We neither agree nor disagree.

3b **Question 3b – Do you agree or disagree The new proposals will provide measures that are more effective at deterring perpetrators**

- 3.3 We neither agree nor disagree.

3c **Question 3c – Do you agree or disagree that the new proposals include measures that are more effective at rehabilitating persistent offenders**

- 3.4 We neither agree nor disagree

3d Question 3d – Do you agree or disagree that the new proposals will allow people in the community to shape the way ASB is dealt with in their area

3.5 We neither agree nor disagree.

Question 3e - Please explain your answers.

3.6 We feel that the community triggers will significantly increase bureaucracy, especially if it is as an addition to established escalation processes or in managing vexatious reports.

Question 4 - Please list any other benefits you see resulting from the new proposals.

4.1 None.

Question 5 - Do you think there are risks related to the introduction of any of the new orders? Please explain your answer to question 5

5.1 We do believe there are risks. In the first instance, the training, capacity and understanding by the courts of the new processes is a risk, meaning decisions may be slower and more difficult to obtain under the new regime. We would strongly support clear training, guidance and briefings for the courts on how to implement the new powers.

5.2 In addition, new orders introduced (in particular injunctive powers) remain unpredictable until High Court consideration.

Question 6 - Some people might think that the new proposals will affect certain groups differently, either positively or negatively. Which, if any, of the following factors might lead people to be affected differently?

6a Question 6a - Age

6.1 Greater negative impact

6b Question 6b - Disability

6.2 Greater negative impact

6c Question 6c - Gender

6.3 Greater negative impact

6d Question 6d - Race

6.4 Greater negative impact

6e Question 6e - Religion or belief

6.5 Greater negative impact

6f Question 6f - Other (please specify)

6.6 Greater negative impact

6g Question 6g - Please explain your responses to question 6

- 6.7 The proposals (especially the Community Trigger and Direction to leave powers) have the potential to disproportionately affect those who are less capable of reporting problems or do not understand their rights, such as vulnerable groups, minority groups, younger persons and those with mental health issues.
- 6.8 In addition, the proposals disproportionately favour certain socio-economic groups, for example, those with a greater capacity to motivate for personal interests or have greater access to information.
- 6.9 For the “community trigger” we have concerns those Registered Providers (who are not currently deemed as “responsible authorities” with Community Safety Partnerships (CSP)), could be disadvantaged by lack of representation or access to the CSP. We recommend that the status of Registered Providers within the statutory CSP framework is re-examined.

Question 7 - Because community safety is a non-devolved matter in Wales, are there any specific issues there that should be recognised?

- 7.1 Not applicable

Criminal Behaviour Orders

Question 8 - Do think that the Criminal Behaviour Order will more or less effective? Please explain your answer.

- 8.1 We believe that the Criminal Behaviour Order will be less effective than the current approaches.
- 8.2 When using this tool and with reference to the requirement of attaching support provisions, it must be clear that positive aspects can be achieved to ensure best possible opportunity for success. For example, if part of the order is that recipient should engage with drug rehabilitation, Registered Providers do not want the Local Authority to then respond and say there are no places available. In addition, it is unclear who would be responsible for the costs associated with any support and who is accountable.
- 8.3 There needs to be really strong partnership working between the Local Authorities, prosecuting authority, support providers and Registered Providers for this to work.

Question 9 - Thinking of existing civil orders on conviction, are there ways that you think the application process for a Criminal Behaviour Order could be streamlined?

- 9.1 Applications can be submitted as part of criminal proceedings (post conviction) or ex-parte injunction proceedings.

Question 10 - Do you agree with the proposal to include a report on the person’s family circumstances when applying for an order for someone under 16? Please explain your answer.

- 10.1 g15 Agrees.
- 10.2 Family circumstances must be considered at all times but it is a major barrier to determine where the responsibility lies in submitting such a report, the data protection requirements and access to external information or information from other agencies.

Question 11 - Are there other civil orders currently available on conviction you think should be incorporated in the Criminal Behaviour Order (for example Drinking Banning Orders)?

11.1 The Criminal Behaviour Order should be flexible enough to incorporate all the existing orders into its terms and conditions. The order must also prescribe the information and communication requirements of each partner agency.

Question 12 - Please indicate whether you think there should be maximum and/or minimum terms for the Criminal Behaviour Order (for under-18s and for over-18s). Please tick one option for each age group:

12a Over 18s

12.1 Both minimum and maximum terms should be prescribed. We anticipate that the majority of orders would be for the minimum of a year, to demonstrate their effectiveness.

12b Under 18s

12.2 The maximum term should be prescribed to guide the courts but not the minimum term

Question 13 - If you answered that the orders should have minimum and/or maximum terms, please provide further information on how long you think they should be, and whether they should be different for over or under 18s.

13.1 For over 18s we suggest a minimum term of 6 months (to demonstrate the impact on behaviour) and maximum term of 2 years.

13.2 For under 18s - should be tied in with other early intervention options and should be for a maximum of 2 years.

Question 14 - Should the legislation include examples of positive requirements, to guide applicant authorities and the courts?

14.1 Yes. However we would like to raise our concerns about the reduced service provision by local authorities, resulting in a reliance on non local authority services for the provision of for example, family, parenting and floating support.

Question 15 - Please list examples of positive requirements (other than formal support provided by the local authorities) you think could be incorporated in the order?

15.1 Support must be funded and made available from a range of providers, both internally and externally. This must be closely linked to information and work provided through GPs and schools.

Question 16 - Do you think the sanctions for breach of the prohibitive elements of the order should be different to those for breach of the positive elements?

16.1 Maximum penalties for breach should be the same for prohibitive and positive elements

Question 17 - In comparison to current orders on conviction, what impact do you think the addition of positive requirements to a Criminal Behaviour Order would have on the breach rate?

17.1 This would significantly increase the breach rate.

Question 18 - In comparison to current orders on conviction, what do you think the impact would be of the Criminal Behaviour Order on i) costs and ii) offending outcomes?

18.1 If Registered Providers are expected to be contributing to Criminal behaviour Orders rather than Injunctions then there will be additional costs, including costs on breach of committal.

Question 19 - In comparison to current orders on conviction, how many hours, on average, of police and practitioner time do you think it would take to prepare and apply for a Criminal Behaviour Order?

19.1 This is unknown based on the information available; however, we would expect it to be comparative to post conviction Anti-Social Behaviour Orders

Crime Prevention Injunctions

Question 20 - Do think that the Crime Prevention Injunction (CPI) will make a difference? Please explain your answer.

20.1 g15 welcome the extension of Injunctive powers to other partner agencies. From our experience, the existing housing ASB Injunction has been used extensively by our members. We again reiterate our recommendation that the ASBI is retained alongside the CPI. We do not believe that CPIs will make a difference to tackling ASB for Registered Providers, the problem will be the same

20.2 Given that these new powers will still need to be tested on their reliability, we feel this would further support the retention of the ASBI. In addition, there are benefits for Registered Providers in enabling injunction proceedings to be heard alongside possession proceedings.

20.3 We would recommend that any new civil injunction includes provisions that enable:

20.3.1 Without notice (Ex-parte) and interim injunctions

20.3.2 Attachment of a power of arrest to relevant terms

20.3.3 Terms of the injunction to be extended ./ carried

20.3.4 That Undertakings can be given to and accepted by the court

Question 21 - In your view, which of the proposed tests do you think the court should use when deciding whether to award a Crime Prevention Injunction?

21.1 Other - the lower threshold of cause 'nuisance or annoyance ' should be kept but to allow for cases of Domestic Abuse and other situations, 'not of the same household' should be removed.

Question 22 - Where do you think the Crime Prevention Injunction for over 18s should be heard? Please explain your answer.

22.1 In the County Court

22.2 It is key for g15 and other Registered Providers that there is an opportunity to combine Injunction proceedings with possession proceedings – as we often link the two. If these were heard in the magistrate's court, this would not be possible.

22.3 We are clear that the County Courts would be the preference – they are experienced in hearing Injunction and ASB cases and are clear on the civil test “balance of probabilities”.

Question 23 - If you think that the Crime Prevention Injunction should be heard in the Magistrates’ Court, do you think the injunction for those under 18 should be heard in the Youth Court?

23.1 No, it should be the same as for over 18's

Question 24 - Please indicate whether you think there should be maximum and/or minimum terms for Crime Prevention Injunction (for under 18s and for over 18s). Please tick one option for each age group:

24a Over 18s

24.1 Both minimum and maximum terms should be prescribed

24b Under 18s

24.2 Both minimum and maximum terms should be prescribed

Question 25 - Should the legislation include examples of positive requirements, to guide applicant authorities and the courts? Please explain your answer,

25.1 Yes

25.2 Guidance should be made available but this must be attached to the availability of funding.

Question 26 - Please list examples of positive requirements (other than formal support provided by the local authorities) you think could be incorporated in the order:

26.1 Support must be funded and made available from a range of providers, both internally and externally. This must be closely linked to information and work provided through GPs and schools.

Question 27 - Do you agree with the proposed breach sanctions for over 18s for the Crime Prevention Injunction?

27.1 Yes.

Question 28 - Do you agree with the proposed breach sanctions for under 18s for the Crime Prevention Injunction? Please explain your answer

28.1 Yes.

28.2 We would expect similar sanctions for over or under-18s in the event of a breach.

28.3 The benefits of using an ASBI for housing cases is that the risk of a tenant losing his/her home is the strongest and most effective sanction for breach. The loss of a home on ASB grounds is sometimes a consequence of an ASBI breach, which would be followed by possession proceedings.

Question 29 - In comparison to current tools, what do you think the impact would be of the Crime Prevention Injunction on i) costs and ii) offending outcomes?

29.1 If Registered Providers are empowered to carry out Criminal Prevention Injunctions effectively then there will be good cost savings (if in line with an estimated approximately

£600 per injunction). On the flip side, should County Courts lose their existing powers in Registered Provider and tenant proceedings, we would expect the costs to significantly increase as there would be a requirement to hold separate injunction hearings to possession hearings.

29.2 There is still an underlying risk of a one-size fits all approach to this proposal and we would like to see built in to these proposals a statutory review period after implementation.

Question 30 - What impact do you think the inclusion of positive requirements would have on the Crime Prevention Injunction breach rate?

30.1 Breaches will inevitably increase and it will be more difficult to enforce positive requirements. It is also undefined as to whether the cost burden of breaches will fall within the responsibility of the Registered Provider.

30.2 It is also unclear whether the police will act on such breaches, it will appear unlikely. In addition, due the impact on local authority budget reviews, who will be responsible for supervising under-18s if the Youth Offending Teams become dismantled?

Question 31 - Thinking of other civil injunctions available, how many hours, on average, of police and practitioner time do you think it would take to prepare and apply for a Crime Prevention Injunction?

31.1 This is impossible to quantify as it depends on the complexity of the cases. It will take longer if a support requirement is mandatory due to the assessment and consultation processes that will be carried out. It is also unclear how the impact of funding cuts to police, Local Authorities and support will affect this.

Community Protection Order

Question 32 – Do you think that the Community Protection Order will improve the response to antisocial behaviour? Please explain your answer.

32.1 We are unsure and don't know enough to say yet whether it will improve the response to ASB. The split of the Community Protection Order into two does not seem to reflect the vision of this review to simplify processes and bureaucracy.

32.2 Where does this fit in with other legislation, such as the Environmental Protection Act? It should be made clear that this order is only an alternative to some of the other statutory notices, for example, litter picking, graffiti, and is not meant to replace them.

32.3 It is good that this order is linked to access to a space/area and individuals committing ASB in the space. At least Registered Providers do not have to go to Court if they just want to restrict access, for example, by imposing times of use or putting a gate in an alley way and giving residents a key. The only time Registered Providers would expect to have to go to Court under this order is if they want to close off the space or premises.

32.4 For level 1 Community Protection Orders, Registered Providers may find it less effective as they already use Notices of Seeking Possession for similar purposes and for Community Protection Orders; it is unclear who will enforce. In addition do Registered Providers have the power to confiscate items causing ASB, and if so what is the legal position and process for disposal?

32.5 Under some circumstances, the Registered Provider can take quicker action and does not have to rely on the local Environmental Health teams. However, there is a significant risk that statutory authorities may end up pushing case, accountability and responsibilities back to the Registered Provider.

32.6 The group feels that the Community Protection Order would benefit from merging level 1 and 2 into a single Order. Alternatively, we would suggest making a clear distinction between the two i.e. calling Level 1 Notice and Level 2 Order.

Question 33 - Are there problems with the existing tools you think should be addressed in the Community Protection Order? If so, please use the space below to explain where you think there are problems and how they might be addressed in the new order.

33.1 There are problems related to the application and understanding of the process. Staff, partners and stakeholders must be sufficiently trained and informed. The main barriers to the existing processes are related to this.

Question 34 - Are there other existing tools you think should be included in the Community Protection Order?

34.1 The proposals appear to include the necessary tools but there must be a degree of flexibility for users to amend Orders according to the circumstances.

Question 35 - Who should be given the power to use a Level 1 Community Protection Order? Please explain your answer

35.1 We believe that the following organisations should receive the power to use level 1 CPO's:

- Police Officers;
- PCSOs;
- Community Safety Accredited Officers;
- Designated officers of the Local Authority;
- Designated officers of Registered Providers; and
- Environmental Health Officers.

35.2 We would expect Registered Providers to be using this power and would highly favour the renaming the Level 1 order a 'Community Protection Notice'.

35.3 There must be clarity on the difference between the statutory responsibilities of the Local Authority under the Environmental Protection Act and that role and responsibilities in serving and enforcing notices are clearly defined.

Question 36 - In comparison to current tools, what do you think the impact of the Community Protection Order would be on (i) costs and (ii) offending outcomes?

36.1 It is predicted that there will be an increase in costs due to the additional administration and possible duplication. Registered Providers will subsequently carry out the full range of early interventions, for example, warning letters, in places of CPOs and may mean that organisations are at risk from not achieving successful enforcement decisions.

Question 37 - In your area, is there any duplication of current orders issued to deal with the problems tackled by either level of the Community Protection Order? If so, could you indicate the extent of duplication?

37.1 Yes, which the proposals do not appear to resolve. There will be duplication with noise abatement notices for example. Duplication will be caused by a lack of communication and an absence of statutory provision for this.

37.2 There will be significantly increased difficulties where Registered Providers are managing in multiple local authorities where there are multiple information sharing arrangements, reporting and escalation procedures.

Question 38 - What impact do you think the simplification of Community Protection Order proposed would have on the number of orders issued?

38.1 The number of orders will increase. It is still unclear how the process will work, who signs and where the information will be held and stored, will it be the Police or the Local Authority?

Question 39 - Thinking of current orders to tackle environmental disorder, how many hours do you think it would take to prepare and issue a Level 1 Community Protection Order? Is this more or less than the time taken to issue current notices aimed at tackling the same problems?

39.1 These are currently processed by the Local Authority and we would expect this to continue.

Question 40 - Thinking of the place-related orders that it would replace, how many hours do you think it would take, on average, to prepare, issue, and implement a Level 2 Community Protection Order?

40.1 This is non-definable and will vary according to the circumstances.

The Directions Power

Question 41 - Do think that the Directions Power will be more effective? Please explain your answer.

41.1 We believe as a group that the Directions Power will be more effective at tackling ASB than the current approaches.

41.2 Communities favour the similar 'Dispersal Zones' power although they are at times ineffective. An improvement on this will be welcomed, for example, if it removes bureaucracy.

41.3 The proposal also lacks detail regarding how it works in practice, such as the threshold for moving individuals on. It is a good idea but there are major risks involved which need to be identified, spelt out and balanced appropriately.

41.4 We are a little concerned about the fact that this is solely down to Officers discretion, this could run into negative situations as the 'Stop & Search' regime.

Question 42 - Do you think the power should be available to PCSOs as well as police officers? Please explain your answer.

42.1 No. PCSOs do not have the power of arrest so would not be effective.

Question 43 - Some people might be concerned that the Directions Power could be unfairly used against certain groups. Which factors might lead people to be unfairly affected?

43.1 There is concern about the regulation and record keeping of this proposed power. There is a risk of not collecting accurate data to build a profile of how this power is used.

Question 44 - Please tell us of any measures you think could be put in place to prevent the groups you indicated above from being unfairly affected by the Directions Power.

44.1 Regulation and record keeping of this proposed power. Clear complaints and review process and that individuals affected know their rights, especially where there are difficulties in comprehension. Accountability is needed and collecting accurate data to build a profile of how this power is used.

Question 45 - What do you think would be the most appropriate sanction for breach of the new Direction power?

45.1 We believe that the most appropriate sanction would be to make it a criminal offence.

Question 46 - Thinking of existing powers to leave a locality, how much police and local authority time do you think would be saved by removing the requirement of having a designated area from which to move individuals or groups from?

46.1 There will be time saved but this must be balanced with provisions to ensure that the power is not used for discriminatory, disproportionate or vexatious purposes.

Question 47 - What do you think the impact would be of removing the need for a pre-designated area on the volume of Directions issued?

47.1 This is unknown and it has not been satisfactorily addressed the problem of dispersing problems onto other areas.

Question 48 - Do you expect there to be a change in the use of the Directions Power (compared to the use of existing tools)? If so, what do you estimate the change would be and what proportion of the Directions Powers used would be aimed at those under 18?

48.1 Not known

Informal tools and out of court disposals

Question 49 - Do you think more restorative and rehabilitative informal tools and out-of-court disposals could help reduce anti-social behaviour? Please explain your answer

49.1 Yes. If this makes an impact then it is a good idea but if not used then it will be ineffective.

Question 50 - Do you think there are currently barriers to communities getting involved in the way agencies use informal and out of court disposals in their area? Please explain your answer.

50.1 Yes.

50.2 Data protection and confidentiality issues, especially in regards to agencies sharing information and communities trusting organisations to handle their sensitive data appropriately. There will also be a problem with vexatious and disproportionate complaints. In addition, the availability of support and rehabilitation services will not be guaranteed.

Question 51 - Are there any other changes to the informal and out-of-court disposals that you think could help in tackling anti-social behaviour?

51.1 A greater regulation of mediation services, increase in the use of Good Neighbour/Community Agreements or codes of conduct. Continue with the use of starter tenancies.

Community Trigger

Question 52 - How do you think the Community Trigger might affect how ASB is dealt with in your area? Please explain your answer

- 52.1 We believe it may improve how ASB is dealt with.
- 52.2 Overall this has the potential to be a good idea as it could make partner agencies within a community safety partnership more accountable. However, where there are 'local offers' agreed with residents, this has the potential to conflict with those.
- 52.3 In Addition, with SNT reductions, Registered Providers are increasingly being asked to do the police's job. Registered Providers are being adopting policing roles which will place a burden on resources (even excluding malicious complaints) at a time when Registered Providers face increasing budgetary restrictions.

Question 53 - Do you agree / disagree that the criteria outlined above are the right ones for the Community Trigger? Please explain your answer.

- 53.1 g15 disagrees.
- 53.2 There are some aspects of this trigger which may place a disproportionate resource burden of organisations, especially the requirement to take action after 3 reports. This is too severe but is must be balanced with the type of problem reported, the time frames involved and so on.
- 53.3 These functions generally exist in the current Councillor and MP enquiries so will have to tie in. In addition, there should be a mechanism which allows Registered Providers to trigger action across their partner agencies.

Question 54 - In your view, could the Community Trigger have a greater impact, either positive or negative, on certain groups? Please indicate if any of the following factors might lead this to happen:

54a Age

- 54.1 Greater negative impact

54b Disability

- 54.2 Greater negative impact

54c Gender

- 54.3 Greater negative impact

54d Race

- 54.4 Greater negative impact

54e Religion or belief

- 54.5 Greater negative impact

54f Other (please specify)

54.6 Greater negative impact

54g Please tell us of any measures you think could be put in place to prevent the groups you indicated above from being negatively affected by the Community Trigger:

54.7 The primary concern is organised self-interest groups forcing action against minority groups or individuals. This may be at odds with ensuring a diverse and cohesive community. Instead of providing tools for Registered Providers to deal effectively with ASB, Registered Providers may end up disproportionately dealing with issues as prioritised and dictated by external influences.

Further contact details

Stephen Howlett

Chair g15
45 Westminster Bridge Road
London
SE1 7JB
020 7021 4229
stephen.howlett@peabody.org.uk
www.g15.org.uk

Liz Chambers

Chair London Housing ASB Group
45 Westminster Bridge Road
London
SE1 7JB
020 7021 4876
Liz.chambers@peabody.org.uk