



## *KILKENNY LOCAL AUTHORITIES*

### *ANTI-SOCIAL BEHAVIOUR*

#### *POLICY*

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## ***1. Introduction***

Kilkenny Local Authorities recognises the effect of anti social behaviour on society in general and it's service users in particular.

Kilkenny Local Authorities is committed to implementing an anti social behaviour policy and procedure which will serve to discourage, reduce or prevent incidents of anti social behaviour.

Kilkenny Local Authorities will not tolerate anti social behaviour and will use all means within its powers to ensure that anti social behaviour is dealt with effectively. Legal procedures such as eviction or excluding orders may occur where relevant persons are found to be involved in such behaviour.

Kilkenny local Authorities will take preventative measures to minimise the possibility of anti social behaviour by ensuring that

- An allocations procedure is in place and that adequate checks are implemented prior to the allocation of properties. This allocations procedure will include areas such as the refusal or deferral of an allocation based on non-disclosure of information, involvement in anti social behaviour or in the interests of Good Estate Management.
- Adequate provision for addressing anti social behaviour exists within the Tenancy Agreement, and ensuring that tenants understand the implications of a breach of this tenancy condition.
- Appropriate supports are in place to allow the development and existence of residents groups in residential areas, to reinforce the benefits of moral ownership of their housing estates and voluntary involvement in community development and environmental initiatives.

The local authority also recognises that an underlying factor in the implementation of any such policy is the duty of care to the wider residential group, who are resident in areas where incidents of anti social behaviour may or do occur. It will continue to provide a workable framework document for both housing service users and staff members dealing with issues of anti social behaviour

This document will present Kilkenny Local Authorities Mission Statement on anti social behaviour matters, the aim and objectives of the policy, the legislative background to same, the detail of complaint recording, the investigation and enforcement process and possible outcomes to this process.

This document **will replace** the previously adopted Anti Social Behaviour Policy Document (Kilkenny County Council, on June 16<sup>th</sup>, and by Kilkenny Borough Council, July 11<sup>th</sup>, 2005).

## ***2. Mission Statement***

Kilkenny Local Authorities mission statement is:

**To investigate all complaints fairly, impartially and objectively, to provide a modern and professional service to our customers/clients/tenants/residents who are victims of anti social behaviour and to work towards the reduction and prevention of anti social behaviour in any relevant residential area.**

## ***3. Aim of the Anti Social Behaviour Policy:***

The aim is to reduce, discourage and, if possible, prevent anti-social behaviour occurring in areas where Housing Service Users covered under the Housing (Miscellaneous Provisions) Act, 1997, as amended under the Housing (Miscellaneous Provisions) Act, 2009, in order to enhance the well being of all persons living in those residential areas.

## ***4. Objectives of the Anti Social Behaviour Policy***

The objectives of the policy are as follows:

- To uphold and apply the Housing Authority's duty of care to the wider residential population in all incidents of anti social behaviour as defined under legislation
- To implement policy and procedures which will prevent and reduce anti social behaviour
- To co-ordinate services with the Housing Authority that are directed at dealing with preventing or reducing anti social behaviour
- To promote co-operation with other persons/bodies, including the Garda Síochána, in the performance of their respective functions in relation to preventing/reducing anti-social behaviour, in order to avoid or reduce duplication of effort between the housing authority and the other person/body in performing their functions; and
- The promotion of good estate management (as defined by section 1 of the 1997 Act)
- To pursue legal remedies, including court orders for evictions or excluding orders, where necessary.
- To investigate all complaints of anti-social behaviour.
- To interview/challenge/caution/the alleged perpetrators.

#### ***4.1 Allocation of Tenancies***

The procedure adopted by Kilkenny Local Authorities avoids allocations as far as possible where the interests of good estate management are in doubt.

The Council **may** refuse to allocate a tenancy where it is considered that the person or household being considered for housing is or has been engaged in anti-social activity or where a person(s) refuses to provide information relating to others residing (or who may reside) with them. The Council has the statutory authority to enforce this action as per the provisions of the Housing (Miscellaneous Provisions) Act 1997 Sect. 14.

However, Kilkenny local authorities will take account of recommendation of the DOEHLG in this area:

***“Refusal of a tenancy or a tenant purchase application will not be an absolute once and for all measure. An application can be reconsidered in the normal way if the housing authority is satisfied that anti social behaviour has ceased and is unlikely to recur”.***

**(Para 19, Appendix to Circular H5/97 13 June 1997)**

The procedure for implementing this provision is as follows –

Where the Council has reason to believe that a housing applicant (or a member of their immediate household) being considered for housing, is or has been involved in anti-social behaviour, the Council –

- will request, in writing, details of such activities from the Garda Siochana.
- will check its own records and records of any previous tenancies as may be appropriate
- the Council may also, where appropriate, make enquiries from the Criminal Assets Bureau, the Department of Social Welfare and the Health Services Executive. The Housing (Miscellaneous Provisions) Act 1997 Sect. 15 provides the statutory basis for this information exchange.

Where having considered the matter, the Council believes that a proposed tenancy allocation would not be in the interests of good estate management, the Council shall refuse to let the dwelling to the person(s) concerned.

This decision will be notified, in writing, to the housing applicant(s) and the reasons why the allocation is being refused outlined.

The Council may re-consider the application at a later date (but not for a minimum period of 12 months) if the Council has reason to believe that the person(s) are no longer engaged in anti-social activity.

#### **4.2 Kilkenny Local Authorities Tenancy Agreement**

Every tenant participates in a pre-tenancy course prior to the allocation of a tenancy and clarification is sought at this stage of the tenant's clear and concise understanding of all conditions of this agreement, including those which relate specifically to anti-social behaviour.

Non compliance with the following tenancy conditions can also result in eviction of a tenant or application for an Excluding Order

*The tenant shall not abuse, harass or interfere with the other tenants in the estate of which the premises form a part of, in nearby premises and shall not through his actions or activities in or in the vicinity of the premises place other residents in fear or distress*

And or

- (a) *Neither the tenant, his/her children nor any member of his/her household residing in the premises or any invitee or visitor to the premises shall cause any nuisance or cause or permit any conduct likely to cause annoyance or disturbance to any neighbours, their children, member of their household residing with them, their invitees or visitors or to authorised Council staff.*
- (b) *The term "neighbours" in this agreement means persons living or working in the vicinity of the premises.*
- (c) *For the purpose of this Agreement the phrase "nuisance, annoyance or disturbance" shall include the use by the tenant of the dwelling for the commission of a criminal offence and without prejudice to the generality of this expression shall include all or any of the following:-*
  - (i) *harassment;*
  - (ii) *violence or threats of violence against the person or property;*
  - (iii) *threats, abuse or harassment of any kind or any act or omission causing disturbance, discomfort or inconvenience;*
  - (iv) *Obstructions of any of the common area, doorways and other exits and entrances in the block and in the estate.*
  - (v) *Making an unreasonably loud noise by shouting, screaming, playing any musical instruments or sound reproduction equipment (including television, radio and hi-fi) or using other machinery;*
  - (vi) *Any act or omission which creates a danger to the well being of any neighbour or to his/her belongings.*
- (d) *The tenant must not, at any time, invite or allow to remain on any part of the premises any persons in respect of whom the Council has notified the tenant that they should not enter or remain on the property.*
- (e) *A tenant evicted for a breach of this condition or part of it or any condition will be deemed for the purpose of re-housing to have deliberately rendered himself/herself homeless within the meaning of Section 11(2)(b) of the Housing Act, 1988 any may not be provided with another home by the Council until such time as the Council is*

*satisfied that the evicted tenant and his/her family are capable of living and are agreeable to live in the community without causing a further breach of this condition or any other condition of this agreement.*

- (f) *The Tenant shall not engage in the unlawful possession, cultivation, use and or supply of a controlled substance within the meaning of the Misuse of Drugs Act, 1977, as amended in the Premises, in the estate of which it forms part or in the vicinity thereof.*

Under the Housing (Miscellaneous Provisions) Act 2009, the definition of anti social behaviour is extended to include

- *behaviour which causes significant or persistent impairment of person's use or enjoyment of his or her home, or*
- *damage to or defacement by writing or other marks of any property including a person's home."*

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### ***4.3 Relevant Legislation, Policy Documents and Bibliography***

In addition this policy is guided by the following legislation and policy documents

Residential Tenancies Act 2004

Housing Acts, 1966 – 2009

Litter Pollution Act, 1987

Control of Dogs Acts, 1986 – 1992.

Control of Horses Act, 1996

Freedom of Information Act 1997 as amended.

Criminal Justice (Public Order) Act, 1994.

Public Health (Ireland) Act, 1879.

Air Pollution Act, 1978.

Children Act 2001

Criminal Justice Act 2006

Disability Act 2005

European Convention on Human Rights Act 2003

Scheme of letting Priorities

Estate Management Policy Document

The Tenancy Agreement

Housing Studies Journal

The Housing Unit (Centre for Housing Research)

- Good Practice in Housing Management, Guidelines for Local Authorities,  
Preventing and Combating Anti-Social Behaviour

### ***4.4 Tenant Education***

#### ***4.4.1 Pre-Tenancy Training***

Kilkenny Local Authorities organises pre-tenancy training for new tenants and it is a condition of an offer of housing that all prospective tenants participate in this element of training.

These courses contain modules outlining the Council's and tenants respective roles and responsibilities, fire safety, household management etc.

There is a specific module in the Pre-Tenancy Training Course relating to anti-social behaviour during which the Council's policy on dealing with the matter and the procedures in reporting cases are clearly explained.

Each new tenant of the Council personally signs up to the Standard Letting Conditions which contains specific clauses prohibiting tenants from engaging in anti-social activity.

The Council will ensure that these are clearly explained to each tenant in advance of every letting.

The Tenants Handbook will be updated to contain very clear guidelines relating to anti-social behaviour and the complaints process.

#### ***4.4.2 Neighbourhood Watch/Community Safety Groups***

**Residents groups and community committees, supported through the Housing Section of the Local Authority are encouraged to form Neighbour Watch/Community Safety Groups, which reinforces the moral ownership of the residential area in which they reside.**

**Representatives of Community Committees and Residents Groups are invited to participate on RAPID Sub-Committees to the Area Implementation Team, specifically the Physical Environment Improvement Scheme Group (PEIS) and the Community Safety Group. This allows a direct interaction between the service providers and service users. Consultation with residents allows identification of areas where physical improvement allows the reduction and/or prevention of crime and anti-social behaviour. Anti Graffiti initiatives allow residents and tenants to take an active role in identifying and resolving graffiti issues on identified RAPID areas.**

#### ***4.4.3 Tenant Participation and Estate Management***

It is the policy of Kilkenny Local Authorities to encourage the active participation of tenants in the management of their estates.

The Council believes that tackling anti-social behaviour can be greatly assisted by the active participation and involvement of tenants in ensuring that our estates can develop a sense of community and pride which discourages such activity.

The active assistance of tenants in liaising with the Council and the Gardai in reporting incidents of anti-social behaviour is vital in ensuring that both bodies have accurate and meaningful data on the levels of activity and which can provide essential information when pursuing cases through the legal framework.

To assist in this process, the Council employs an Estate Management Liaison Officer and a Tenant Liaison Officer, whose role includes encouraging greater tenant participation, supporting residents associations and liaising with other agencies. A limited tenant participation support is arranged for tenants in private housing developments.

Kilkenny Local Authorities shall seek to establish resident's associations in all new local authority housing estates.

Kilkenny Local Authorities shall also assist residents in existing estates to form resident's associations, where they do not exist, and to further support such associations as appropriate.

#### ***4.4.4 Training and Education***

**Kilkenny Local Authorities are also pleased to offer training and support to residents groups, dependant on available resources, to facilitate their active participation in estate management initiatives and prefer the asset based approach rather than a needs based programme.**

#### **4.4.5 Reviewed Tenants Handbook**

Kilkenny Local Authorities has recently completed a comprehensive review of the Tenant's Handbook and has expanded previous content in relation to anti social behaviour. This section of the handbook explains clearly the local authorities' policy on anti social behaviour, and the implications of being involved in persistent anti social behaviour. Under current legislation, the following acts of persistent anti social behaviour will result in the implementation of Kilkenny Local Authorities anti social behaviour policy.

- Drug dealing
- Criminal activity
- Violence or threats of violence
- Intimidation or threats of intimidation
- Persistent loud noise/parties
- Damage to property
- Litter related issues
- Uncontrolled children
- Uncontrolled domestic pets

Offending tenants and their families will have their homes re-possessed. Evictions will be carried out in all cases where tenants or members of their household are involved in drug dealing or allow their dwellings to be used for drug dealing.

Tenants evicted will be regarded as having deliberately rendered themselves homeless and will not be re-considered for inclusion on the housing list for a number of years.

***Tenants who are evicted will not be accommodated in an emergency housing unit and any application for rental subsidy made on their behalf will be at the discretion of the community welfare officer, as it will not be supported by the Local Authority.***

#### **5. Interagency Collaboration**

Local authorities, and social housing agencies in particular, are being given an increasing role within multi-agency partnerships aimed at governing local incidences of anti-social behaviour. This document places this emerging role for social housing agencies within theories of governmentality and wider trends in urban governance and suggests that present developments may be understood through a paradigm of housing governance. Social housing agencies face a number of dilemmas in reacting to their emerging role and that such dilemmas reflect wider concerns about the new governance.

##### **5.1 Tenancy Sustainment**

***In the initial stages of the anti social behaviour process, it may arise that the behaviour dissipates and in such a situation, Kilkenny Local Authorities are pleased to offer an Outreach and Tenancy Sustainment Service to these residents, in order to prevent the re-occurrence of involvement in anti social behaviour. This service is offered under a contractual Service Level Agreement with an independent agency. Engagement with this***

*process may result in the drawing up of an acceptable behaviour agreement, which although not legally binding, gives an indication of the tenant's willingness to proactively desist from involvement in anti-social behaviour. The provision of this service is dependant on available resources.*

### **5.2. Exchange of information between Specified Bodies**

Section 15 of the 1997 Act gives housing authorities the power, for the purposes of carrying out their housing functions, to exchange information about particular persons, whom the authority considers may be involved in anti social behaviour, between themselves and with specified bodies (e.g. the Gardai, the HSE, approved housing bodies, Community Welfare officers and CAB – the Criminal Assets Bureau). This provision currently applies to local authority tenants, prospective local authority tenants, and applicants for local authority housing. Item 5 of Part 5 of Schedule 2 of The Housing (Miscellaneous Provisions) Act, 2009, will extend this power to also cover:

- Occupants of, or applicants for, sites for travellers
- Tenants of, or applicants for accommodation by approved bodies; and
- Applicants for, or beneficiaries of housing support under existing affordable housing schemes.

Under The Housing (Miscellaneous Provisions) Act, 2009, these powers will also extend to cover the following:

- Tenants of, or applicants for accommodation under a rental accommodation availability agreement (RAS)
- Applicants for, or beneficiaries of, housing support under the incremental purchase scheme
- Applicants for , or beneficiaries of, housing support under the tenant purchase of apartments scheme; and
- Applicants for, or beneficiaries of, housing support under the new affordable dwelling purchase arrangements.

## **6. Legislative Background To Anti Social Behaviour Policy:**

The Housing (Miscellaneous Provisions) Act, 1997 and The Housing (Miscellaneous Provisions) Act, 2009 provide the legal framework for the development and enforcement of an anti social behaviour policy and the updating of any existing policy.

### **6.1 Definition of Anti Social Behaviour**

The definition of anti social behaviour includes any or all of the following, as defined in the Housing (Miscellaneous Provisions) Act, 1997 Act, Section 1 and amended by the Housing (Miscellaneous Provisions) Act 2009, Item 1 (a) of Part 5 of Schedule 2 of as:

- (a) *“the manufacture, production, preparation, importation, exportation, sale, supply possession for the purpose of sale or supply, or distribution of a controlled drug (within the meaning of the Misuse of Drugs Acts, 1977 and 1984)”*
- (b) *“any behaviour which causes or is likely to cause any significant or persistent danger, **alarm**, injury, damage, loss or fear to any persons living, working or otherwise lawfully in or in the vicinity of a house provided by a housing authority under the Housing Acts 1966 to 1997, or a housing estate in which a house is situate and, without prejudice to the foregoing, includes*
  1. *violence threats, intimidations, coercion, harassment, or serious obstruction to any person*
  2. *behaviour which causes significant or persistent impairment of person’s use or enjoyment of his or her home, or*
  3. *damage to or defacement by writing or other marks of any property including a person’s home.”*

### **6.2 Implications of amendments to Legislation**

The provisions of the 1997 Act apply to and allow the development and enforcement of anti social behaviour policies in relation to the following:

- Local authority tenants
- Prospective local authority tenants
- Applicants for local authority housing

The 1997 Act also allows the exchange of information

Item 5 of Part 5 of Schedule 2 of the Housing (Miscellaneous Provisions) Act, 2009 extends the scope of this power to cover the following:

- Occupants of, or applicants for, sites for travellers
- Tenants of, or applicants for, accommodation provided by approved bodies; and
- Applicants for, or beneficiaries of, housing support under the existing

Increased responsibilities are underpinned by the 2009 Act and as such tenants in the following areas are also now included in and may be subject to the anti social behaviour policies of Kilkenny Local Authorities:

- Tenants of, or applicants for accommodation under a rental accommodation availability agreement (RAS)
- Applicants for, or beneficiaries of, housing support under the incremental purchase scheme
- Applicants for, or beneficiaries of, housing support under the tenant purchase of apartments scheme; and
- Applicants for, or beneficiaries of, housing support under the new affordable dwelling purchase arrangements.

### ***6.3 Powers of the Local Authority under Housing Legislation***

This Act provides a range of measures for the Local Authority to address problems arising on their housing estates from drug dealing and anti social behaviour. It introduced the “excluding order” procedure (Section 3, 1997 Act) whereby a Local Authority may take a more targeted approach to deal with a situation where only one or some of the members of a household are engaging in anti social behaviour.

A Local Authority tenant/relevant purchaser can apply for an exclusion order against a joint tenant or member of a household who is engaged in anti-social activities. A Local Authority also has the right to apply for an excluding order against a household member where the tenant may be intimidated or fearful of doing so. A Local Authority cannot apply for an Exclusion Order against a tenant or a relevant purchaser.

The Local Authority also has the power to recover possession of a rented property by eviction under Section 62 of the Housing Act, 1966 as amended. This power could be used in a case where the tenant/all members of a Local Authority household are engaging in anti social behaviour.

## ***7. Complaints Procedure***

Kilkenny Local Authorities will endeavour to address the problem of anti-social behaviour in, or in the vicinity of, its dwellings by taking measures to prevent and abate such behaviour. All complaints of anti-social behaviour will be investigated in a fair, impartial and objective manner, and will vigorously apply the legislation in all serious cases. Kilkenny Local Authorities will endeavour to liaise with the Gardai and the Health Services Executive on a regular basis.

All complaints from the public, information from the public, records/files, internal case conferences, information received from Gardai/Health Board and the identities of the complainants are protected from disclosure under Section 26 (1) (a) of the Freedom of Information Act 1997.

Kilkenny Local Authorities reserves the right not to act in any case where we consider the complaint vexatious, trivial or unfounded.

### ***7.1 Complaints Procedure - Enforcement***

The Council has a dedicated Anti-Social Behaviour Officer.

The Officer is based within the Housing department.

The primary role of the Anti-Social Behaviour Officer will be the recording, investigation, monitoring and review of anti-social behaviour complaints.

The Officer shall also keep a record of all substantiated complaints of anti-social behaviour together with details of the action taken and the outcome in each case.

### ***7.2 Complaints Procedure – The Process***

Tenants of the Council are advised to make complaints to the Council where they believe that anti-social behaviour is occurring in their community.

Complaints will be accepted in writing, by phone or in person.

Complainants will always be strongly advised to report the matter in question to the Gardai.

In a case where legal action is anticipated, the Council may request a full written statement from the complainant.

The Council will investigate complaints made, in a fair and impartial manner, within a reasonable timescale dependant on the resources available. This may involve enquiries with other statutory agencies in accordance with Item 5 of Part 5 of Section 2 of the Housing (Miscellaneous Provisions) Act 2009.

Anonymous complaints will generally not be accepted except in the case where a large number of such complaints are received relating to an individual or household and the matter will be dealt with as considered appropriate. Kilkenny Local Authorities reserve the right not to pursue anonymous complaints.

The complaints procedure is confidential and every effort will be made to protect the identity of the complainants unless the complainant specifically states otherwise.

All complaints will be entered onto the Anti-social behaviour database and acknowledged to the complainant(s).

### ***7.3 Complaints Procedure - Recording the Complaint***

Kilkenny Local Authorities intends to **introduce** a computerised complaints system (subject to funding being available) to deal with complaints of anti social behaviour as defined by the Housing (Miscellaneous Provisions) Act 1997 and amended under the

Housing (Miscellaneous Provisions Act) 2009. The dedicated Anti Social Behaviour section within the Housing Section will deal with all such complaints. Complaints are accepted by telephone or in writing and all such complaints are recorded on the system.

The person making the complaint will be known as the complainant

The person complained about will be known as the respondent

The Council employee with responsibility for investigating the complaint is the Anti Social Behaviour Officer, Housing Department

Complaints which do not fall within the definition of the 1997 or 2009 Acts are usually breaches of the Tenancy Agreement and they are also recorded on the same computerised system.

In cases where legal action is anticipated, complainants are requested to attend at Kilkenny Local Authorities Housing Office and to provide a full statement of the complaint.

Kilkenny Local Authorities reserve the right not to pursue individual anonymous complaints.

#### ***7.4 Complaints Procedure - Investigation***

All complaints are investigated fully, to allow both parties to explain their side of the case. Statements may be taken by the investigating officer to record the complaint formally. If the investigation reveals that the matter should be taken further, a formal procedure is instigated.

This procedure will involve a series of warnings, formal meetings, and may lead to the issue of a Notice to Quit.

The investigation will be carried out by the Anti-Social Behaviour Officer

In deciding on the approach to an investigation the Council will have regard to the following factors –

- the relative priority of the complaint
- the reliability of the information received
- the tenant's previous history and behaviour

The Anti-Social Behaviour Officer will investigate every complaint in a fair, impartial and objective manner.

The respondent may be interviewed at his /her dwelling, or in some cases at the Council Offices. All allegations will be presented to the respondent and the complaints database will be updated with any comments made. Any responses will be fully investigated and taken into account, as appropriate. If the Anti Social Behaviour Officer has reasonable grounds for believing that the respondent is involved in anti-social behaviour or has breached his/her tenancy agreement, the matter will be dealt with in any (or all) of the following ways:

No further action

Referral to other Agencies such as the Gardai/Health Services Executive

Await investigation by other agencies

Apply for Excluding Order

Terminate tenancy by service of Notice to Quit.

### **7.5 Categories of complaints**

The nature and extent of every investigation will be determined by the relative seriousness of the complaint and the priority assigned to it under the following headings-

Drug dealing as defined by Sec 1 Housing (Miscellaneous Provisions) Act 1997	High
Violence	High
Damage to property	High
Alcohol/Solvent abuse	High
Threats and intimidation	High
Noise	High
Boundary/Parking disputes	Low
Rubbish/Maintenance	Low
Dogs	Low

The priority of any complaint may be upgraded if the complaint is persistent in nature.

### **7.6 Vexatious Complaints**

The Council may decide not to proceed with an investigation if there is reason to believe that the complaint has no substance or is of vexatious nature.

In such cases the Council will inform the complainant(s) of the decision.

If the complaint is found to be vexatious in nature, the Council may issue a warning to the Complainant.

If the Anti-social Behaviour Officer has reasonable grounds for believing that the complaint is unfounded then no further action will be taken.

### **7.7 Excluding Orders**

Kilkenny Local Authorities will adopt a strict policy in relation to tenants or other people involved in drug dealing from Council dwellings or on Council estates, and will consider making application for Excluding Order or Service of Notice to Quit. Warning letters will not be sent to tenants or other people involved in drug dealing from Council dwellings or on Council estates.

If a decision is made that an Excluding Order should be sought, the tenant will be advised to apply to the District Court for such an Order.

If the tenant, through violence, threat, fear or for any other reason will not apply for an Excluding Order, Kilkenny Local Authorities may apply for such an Order after consultation with the tenant, and the Health Services Executive.

### **7.8 Possible Resolutions:**

1. The situation abates.
2. Tenant voluntary surrenders and seeks alternative accommodation.
3. Court proceedings followed by eviction.

### **7.9 Re-housing:**

Applications for re-housing from families who are evicted for anti social behaviour will only be considered where there is sufficient reason to believe that there will not be a re-occurrence of the anti social behaviour. Under section 14 of the Housing Act 1997, a local authority may refuse to make or defer the making of a letting of a dwelling to a person where that person has been engaged in anti social behaviour in the interests of good estate management.

***Furthermore, in the event of any household or individual being evicted or excluded from their tenancy under the terms outlined in this policy, these person or persons will not be supported into Emergency Accommodation provided by the Local Authority.***

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