



SCRUTINY COMMITTEE
Thursday, 21 December 2023

Subject	Review of Approach to Tackling Anti-Social Behaviour in East Suffolk
Cabinet Member	Councillor Jan Candy, Cabinet Member with responsibility for Community Health
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Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	N/A
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

To provide the Committee with an overview of Anti-Social Behaviour in East Suffolk. This includes the statutory definition of ASB, an outline of the services involved in the Council's response to ASB, an overview of the relevant legislation and powers, an explanation of key partners that the Council works with to tackle ASB, provided in the form of responses to the range of questions included in the scoping document developed by the Committee.

Options:

Scrutiny Committee Members are asked to consider the background information and statistics provided in this report and to consider the challenges and opportunities identified in the final section.

Recommendation:

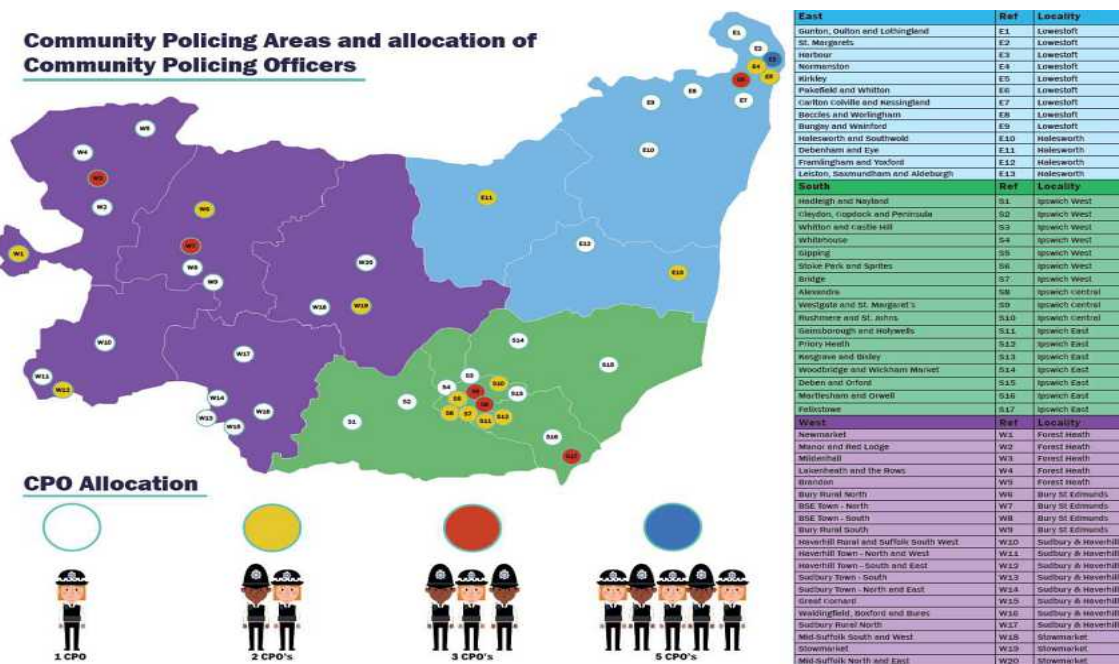
That the Scrutiny Committee consider the report, which includes answers to the 31 questions provided in the scoping document, and consider how the response to ASB in East Suffolk could be further enhanced.

Corporate Impact Assessment

Governance:

ASB is a priority for both the Suffolk Safer Stronger Communities Board and the East Suffolk Community Safety Partnership. It is identified as a local priority in the new Suffolk Constabulary 'Redesigning the local Policing Operating Model to Keep Suffolk Safe' document, an extract from which is reproduced below and shows the new Community Policing Model (and Community Policing Officer allocation) for Suffolk:

Community Policing Areas and allocation of Community Policing Officers



ESC policies and strategies that directly apply to the proposal:

'Take action to improve Community Safety and reduce ASB' is one of eight priorities is one of eight priorities under the Tackling Inequalities theme of the new ESC Strategic Plan 'Our Direction 2028'.

As outlined in the background section to this report, East Suffolk Council refreshed its ASB Policy in 2021. ASB is also one of seven priorities in the East Suffolk Community Safety Partnership Action Plan.

Environmental:

Public Spaces Protection Orders can be issued by councils to control dogs on beaches, playgrounds and other areas and are required when applying for Blue Flag status.

Equalities and Diversity:

Some protected characteristics (as identified in the Equality Act 2010) are taken into account when undertaking a Risk Assessment Matrix (RAM) with ASB victims to assess their level of vulnerability. Sometimes, as was the case in the Leicestershire example identified below, belonging to a protected characteristic group e.g. having a disability is the basis of the ASB and this would be identified and reflected in the risk score identified for an individual case.

Financial:

Consideration is currently being given to the best staffing structure model to deliver the Council's responsibilities in terms of ASB which may have some financial implications in terms of additional staffing resources to meet increasing demand and complexity of ASB cases.

Human Resources:

As above

ICT:

No specific implications other than that the three main Teams dealing with ASB in the Council all use different recording systems.

Legal:

The Council's Legal Team is involved in drafting formal documents and various aspects of implementing the relevant powers (as outlined in 1.5)

Risk:

This area of work is identified as a risk in the Corporate Risk Register. This has been added in the last three months due to the increasing demand and complexity of ASB cases and the mismatch between this and the resources available within the Council to support the delivery of an effective service to the victims of ASB.

External Consultees:

Unfortunately, Suffolk Constabulary, who are a key partner in tackling ASB in East Suffolk, are not able to attend the Scrutiny Committee meeting but have provided a short briefing note (Appendix A).

Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>How does this proposal support the priorities selected</p> <p>Tackling ASB in East Suffolk in a timely, co-ordinated and effective way is an important part of ‘maximising health, wellbeing and safety in the district’. Increasing ASB reporting and reducing ASB overall clearly contributes to our ambitions around Community Pride. It is important that we use relevant data at Suffolk and East Suffolk to guide our work to tackle ASB e.g. identify ASB hotspots, as per the alcohol-related Public Space Protection Order (PSPO) in the Harbour Ward in Lowestoft which was recently renewed for another three years.</p>			

Background and Justification for Recommendation

1 Background facts

1.1 Question 1: What constitutes anti social behaviour?

Legal Definition

The legal definition of ASB is taken from the **Anti-Social Behaviour Crime and Policing Act 2014**:

- Conduct that has caused or is likely to cause harassment, alarm, or distress to any person.
- Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises or
- Conduct capable of causing housing-related nuisance or annoyance to any person.

Landlords, the police, and local authorities have to consider various factors when deciding how best to deal with reports of anti social behaviour. Key factors are the suffering of the victims and impact on the wider community.

Examples of anti-social behaviour can include, but are not limited to:

- noisy and/or abusive behaviour
- vandalism
- graffiti
- intimidation
- public drunkenness
- littering
- fly tipping
- illegal drug use
- excessively barking dogs

Some behaviour, even though it may cause nuisance to individuals, may not be regarded as ASB, for example:

- one-off parties and barbecues
- infrequent and occasional noise or disturbances
- children's play
- occasional dog barking
- noise from domestic appliances (e.g., washing machines, vacuum cleaners)
- minor vehicle repairs
- gossip

However, it is widely accepted that the definition of ASB can be confusing and subjective. Whilst examples of ASB can be provided (as per the list provided above), what one person considers to be ASB, another person may not. The subjective term '**likely to cause**' further clouds the issue.

ASB Strategic Board Principles

In October 2022, the Home Office Anti Social Behaviour Strategic Board developed a **set of principles** to describe what a consistent approach to understanding and addressing anti-social behaviour (ASB) in local communities would look like. All partners involved in responding to and reducing ASB across Suffolk have welcomed and adopted these principles as a guide to delivering the best possible outcomes to victims of ASB.

The principles are:

1. Victims should be encouraged to report ASB and expect to be taken seriously. They should have clear ways to report, have access to help and support to recover, and be given the opportunity to choose restorative approaches to tackling ASB.
2. Agencies will have clear and transparent processes to ensure that victims can report ASB concerns, can understand how the matter will be investigated and are kept well informed of progress once a report is made.
3. Agencies and practitioners will work across boundaries to identify, assess and tackle ASB and its underlying causes. Referral pathways should be clearly set out between services and published locally. This includes pathways for the anti social behaviour case review and health services.
4. The public's ASB concerns should always be considered both nationally and locally in strategic needs assessments for community safety. Best practice should be shared through a network of ASB experts within each community safety partnership, each policing area and nationally.
5. Adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it. Agencies should deliver appropriate interventions, which may include criminal justice options, based on the seriousness, risks and vulnerabilities of the case.

The importance of getting our response to ASB right

The two case studies below highlight, for different reasons, how important it is to get our response to ASB right and ensure that we are providing the best possible ASB service. These cases, one national and one from Suffolk, highlight specific gaps in service delivery across agencies and the serious implications of getting it wrong:

Fiona Pilkington Leicestershire 2009

Fiona Pilkington killed herself and her severely disabled daughter as a result of sustained ASB she was experiencing perpetrated by a group of local youths. The review of Fiona and Frankie Pilkington's deaths found failings by numerous agencies, including Leicestershire County Council and Hinckley and Bosworth Borough Council, as well as the Police and Social Services. Frankie had significant developmental delay, and was functioning at the level of a three or four year old [2009-Fiona-Pilkington-Leicestershire.pdf \(hampshiresab.org.uk\)](https://www.hampshiresab.org.uk/2009-Fiona-Pilkington-Leicestershire.pdf)

	<p><u>Stella Maris, Suffolk 2020</u></p> <p>In 2020, Suffolk County Council launched an independent inquiry to review events that occurred at and around the Stella Maris supported living accommodation for vulnerable people with learning disabilities and mental health conditions on the outskirts of Ipswich. It followed concerns expressed by local residents, over 18 months, about noise, antisocial behaviour, and the evolving situation at the address.</p> <p>The report made a number of recommendations around identifying ASB hot spots, repeat occurrences of incidents of a similar nature in a location, and mechanisms for escalating these to senior officers for formal review to ensure the right type and level of multi-agency working and action is in place.</p> <p><u>Stella Maris enquiry report - Suffolk County Council</u></p>
1.2	<p>Question 2: What legislation relates to the different types of ASB?</p> <p>Under section 17 of the Crime and Disorder Act 1998 a duty to consider crime and disorder implications is placed upon local authorities.</p> <p><u>Crime and Disorder Act 1998 (legislation.gov.uk)</u></p> <p>(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,</p> <p>(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and</p> <p>(b) the misuse of drugs, alcohol, and other substances in its area and</p> <p>(c) re-offending in its area</p> <p>(d) serious violence in its area.</p> <p>The key legislation in relation to anti social behaviour is the 2014 Anti Social Behaviour, Crime and Policing Act: <u>Anti-social Behaviour, Crime and Policing Act 2014 (legislation.gov.uk)</u></p> <p>The 2014 Act rationalised/revised the existing tools for tackling antisocial behaviour, provided a new suite of broader powers (listed below) for public authorities and the community trigger (now known as ASB Case Review), introduced new penalties and stipulated the need for greater involvement of victims and local people:</p> <ul style="list-style-type: none"> • Civil Injunctions • Criminal Behaviour Orders • Dispersal powers • Community Protection Notices, Public Spaces Protection Orders and Closure powers • New absolute grounds for possession • Case Review (formally known as the Community Trigger and Community Remedy • Dangerous Dogs

In March 2023, Prime Minister Rishi Sunak launched an **Action Plan to tackle anti-social behaviour**. The Action Plan establishes a zero-tolerance approach to all forms of anti-social behaviour.

Under the plan, 16 areas (Suffolk is not a 'trailblazer' area) have been funded to support either new 'hotspot' police and enforcement patrols in areas with the highest rates of anti-social behaviour or trial a new 'Immediate Justice' scheme to deliver swift and visible punishments. Following these trailblazers, both schemes will be rolled out across England and Wales from 2024.

Hotspot trailblazer areas will see an increase in police presence, alongside other uniformed authority figures, in problem areas for anti-social behaviour including public transport, high streets or parks. The increased presence will help deter anti-social behaviour, step up enforcement action against offenders, make sure crimes are punished more quickly and drive deterrence efforts, helping to stop anti-social behaviour spiralling into more serious criminality.

Under the new Immediate Justice scheme, those committing anti-social behaviour will be made to repair the damage they inflicted on victims and communities, with an ambition for them to start work as soon as 48 hours after their offence so victims know anti-social behaviour is treated seriously and with urgency. Offenders, who will be made to wear high-vis vests or jumpsuits and work under supervision, could be made to pick up litter, remove graffiti and wash police cars as punishment for their actions, and victims of anti-social behaviour from the local community will be given a say in offenders' punishments to ensure justice is visible and fits the crime.

Other measures identified in the Action Plan include:

- Increasing the punishment for those who graffiti, litter or fly tip with fines of up to £1,000. Council league tables are to be published for fly tipping. ESC was 172 out of 308 local authorities in the first iteration of these league tables.
- Giving landlords and housing associations more powers to evict unruly tenants who ruin their neighbours' lives through persistent noise or by being drunk and disorderly
- Reopening empty shops by giving councils new powers to quickly take control and sell off the rental rights for empty buildings
- An ASB Taskforce jointly led by the Home Secretary and the Secretary of State for Levelling Up will bring together national and local partners, with a sole focus of addressing anti-social behaviour and restoring pride in place in communities. This will bring together Police and Crime Commissioners, police and local partners and agencies
- An extra one million hours of youth services in areas with the highest rates of anti-social behaviour to put people on the right track and prevent them from offending in the first place
- Tackling 'cuckooing' or home invasion by engaging with stakeholders on the scope of a potential new criminal offence
- Parks and green spaces will also be restored with up to £5 million to make them safer with new CCTV and repairing equipment and playgrounds, and to plant more trees and flowers

1.3	<p>Question 3: Is everything prescribed in law or does the Council have any flexibility in how it approaches ASB?</p> <p>As outlined above in 1.2, Section 17 of the Crime and Disorder Act 1998 places a duty on Councils to consider ASB and the legislation outlined above provides the legal framework and a range of tools available for dealing with ASB. The Council takes a graduated approach to enforcement, as outlined below in the answer to Question 5.</p>
1.4	<p>Question 4: Does the Council have a policy and/or any protocols for dealing with ASB?</p> <p>The Council's ASB Policy was updated in 2021 and is available on the ESC website at: Anti-social-Behaviour-Policy.pdf (eastsuffolk.gov.uk)</p> <p>This sets out our aims and objectives in tackling ASB, definitions of ASB, our support for victims, witnesses and perpetrators, the ASB Case Review process, Limitations and Information Sharing and Confidentiality.</p>
1.5	<p>Question 5: What type of measures can be put in place to deal with ASB for both an individual and groups?</p> <p>ESC adopts a graduated approach to enforcement, as set out in our ESC Compliance and Enforcement Policy: Suffolk Coastal and Waveney DC Compliance and Enforcement Policy (eastsuffolk.gov.uk). This outlines our Enforcement Principles and defines our levels of enforcement activity:</p> <ul style="list-style-type: none"> • No action • Informal action and advice • Fixed Penalty Notices • Penalty Charges • Formal Notices • Detention/seizure of food/goods/equipment • Refusal, revocation or suspension of a licence or approval • Simple caution • Prosecution • Statutory Order <p>It also explains how we work with partners and other regulatory bodies and our service delivery standards, quality and performance monitoring.</p> <p>As outlined above, the Anti-Social Behaviour, Crime and Policing Act 2014 streamlined the powers available to the police, local authorities, NHS and social landlords to deal with anti-social behaviour.</p> <p>The first stage in the process is early intervention which, especially through informal approaches, can be successful in stopping the anti-social behaviour committed by the majority of perpetrators. Early and informal interventions can reinforce the message that anti-social behaviour will not be tolerated. In many cases, awareness of the impact of their behaviour on victims, and the threat of</p>

more formal enforcement tools, can be a sufficient incentive for an individual to change their behaviour.

Informal interventions should be considered first in most cases, particularly when dealing with young people, as they can stop bad behaviour before it escalates. There are a range of informal approaches available, including:

- verbal and/or written warnings
- Acceptable Behaviour Agreements (ABAs)
- Neighbourhood agreements
- Mediation

A brief overview of the more formal powers available to local partners is provided below – it is important to note that some powers can only be used by specific agencies e.g. the criminal behaviour order is linked to a court conviction and only the Police have dispersal powers.

Civil Injunction

The injunction is a civil power which can be applied for to deal with anti-social individuals. The injunction can offer fast and effective protection for victims and communities and set a clear standard of behaviour for perpetrators, stopping the person's behaviour from escalating. It can be used to deal with a wide range of behaviours such as vandalism, public drunkenness, aggressive begging, irresponsible dog ownership, noisy or abusive behaviour towards neighbours or bullying.

Although the injunction is a civil power, it is still a formal sanction and many professionals will want to consider informal approaches before resorting to court action, especially in the case of under 18s. An injunction can be issued on the balance of probabilities and can be used to prevent someone from doing something or to cause them to do something.

Criminal Behaviour Order (CBO)

CBOs are designed to prevent behaviour which causes harassment, alarm or distress. The CBO is available on conviction for any criminal offence in any criminal court. The order is aimed at tackling the most serious and persistent offenders where their behaviour has brought them before a criminal court.

The CBO can deal with a wide range of anti-social behaviours following the Individual's conviction for a criminal offence, for example, threatening violence against others in the community, persistently being drunk and aggressive in public or criminal damage. Agencies must make proportionate and reasonable judgements before applying for a CBO. A court may make a CBO against anyone over the age of 10.

Dispersal Power

The police have powers to disperse people causing harassment, alarm or distress, allowing them to direct a person who has committed, or is likely to commit, anti-social behaviour to leave an area and not return for up to 48 hours.

The dispersal power is a flexible power which the police can use in a range of situations to disperse anti-social individuals and provide immediate short-term respite to a local community. The power is preventative as it allows an officer to deal instantly with someone's behaviour and nip the problem in the bud before it escalates. A police officer (or PCSO where designated) can give a direction to anyone who is, or appears to be, over the age of 10. If the officer reasonably believes the person given the direction to be under the age of 16, the officer can take them home or to another place of safety.

The police officer or PCSO can also require the person to hand over items causing or likely to cause anti-social behaviour. This could be any item but typical examples are alcohol, fireworks or spray paint.

Community Protection Notice

This new power was introduced to deal with unreasonable, ongoing problems or nuisances that are "detrimental to the local community's quality of life" (such as noise, graffiti, littering and dog fouling). Examples given by the Home Office (in "Putting Victims First") include an individual who regularly allows their dog to foul a communal garden and a group regularly taking the same route home late at night whilst drunk, making noise and waking their neighbours.

CPNs may be issued to anyone over 16, or a business or organisation, requiring them to stop causing the problem and/or take reasonable steps to ensuring it does not occur again. The power to issue CPNs is available to local authorities (including designated persons within the authority), the police and registered providers of social housing.

Public Space Protection Order (PSPO) (Open Spaces)

PSPO's impose conditions on the use of an area in order to address a particular nuisance or problem that is, or might become, detrimental to the local community's quality of life. They are designed to ensure the law-abiding majority can use and enjoy public spaces, safe from anti-social behaviour. The definition of public space is wide and includes any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission, for example a shopping centre.

PSPOs are exclusive to local authorities which must consult with the police and relevant representatives of the local community (for example, local residents, Parish Councils or community groups that regularly use the public place) and be satisfied:

- on reasonable grounds that the activities carried on or likely to be carried on are detrimental to the local community's quality of life; and
- that the impact justifies the restrictions being put in place in a particular area.

The order will impose conditions on the way in which an area is used and apply to everyone using the space or to certain groups. The order may prohibit behaviours (for example drinking alcohol) or require specific things to be done (for example, keeping dogs on a lead), or include both so that the requirements of a specific place may be addressed in a single order.

Examples given by the Home Office (in “Putting Victims First”) to show where the order could be used include preventing groups from using a public square as a skateboard park and discouraging drunken ASB in the same place by making it an offence not to hand over containers of alcohol when asked to do so; and preventing dogs fouling a public park or being taken into a play area within that park. Orders last for up to 3 years and may be extended following a review. They may be varied or discharged at any time by the local authority. In addition, police officers and PCSOs will have the ability to enforce the order.

Community Protection Order (Closure)

Closure notices and orders replace more specific closure powers relating to licensed and non-licensed premises causing, or are likely to cause, anti-social behaviour. They are a fast, flexible power that be used to protect victims and communities. The power comes in two stages: the closure notice and the closure order which are intrinsically linked.

The closure notice can be used by the council or the police out of court. Following the issuing of a closure notice, an application must be made to the magistrates’ court for a closure order, unless the closure notice has been cancelled. Examples given by the Home Office (in “Putting Victims First”) where a notice could be used include closing a nightclub where the police have intelligence to suggest that disorder is likely in the immediate vicinity on a specific night. A closure order might be sought for a premises used for drug dealing or a premises where the persistent behaviour of the residents (e.g. frequent loud parties, harassment and intimidation of neighbours) is associated with serious anti-social behaviour in the immediate vicinity.

Absolute Ground for Possession

The Act introduces a new absolute ground for possession of secure and assured tenancies where anti-social behaviour or criminality has already been proven by another court. As the landlord no longer needs to prove that it is reasonable to grant possession, the court will be more likely to determine cases in a single, short hearing. This will strike a better balance between the rights of victims and perpetrators, and provide swifter relief for victims, witnesses and the community. The new absolute ground is intended for the most serious cases of anti-social behaviour and landlords should ensure that the ground is used selectively. It can be used for secure and assured tenancies, and, therefore, will be able to be used by both social landlords and private rented sector landlords. The new provisions, and way in which they operate, are added to the discretionary grounds for possession available to courts in the Housing Act 1988.

Statutory Nuisance

Statutory nuisance has a higher threshold and is a criminal rather than civil offence. Statutory nuisance and ASB are different, but both can apply within one case.
Statutory Nuisance

The Environmental Protection Act 1990 (EPA) requires a local authority to take “such steps as are reasonably practicable” to investigate complaints of statutory nuisance.

It is a statutory duty on local authorities to inspect its district from "time to time" to identify nuisance.

A statutory nuisance is related to a premises rather than a person. The premises can be domestic, industrial, agricultural, commercial or leisure related. Statutory nuisance is not confined to domestic premises.

A statutory nuisance is a nuisance that is either prejudicial to health or a statutory nuisance. The definition of prejudicial to health is a narrow definition and confined to disease or injurious to health through infection rather than through physical injury or risk of injury. For a nuisance to be a statutory nuisance it must cross a boundary and must be deemed to have significant effect so as to materially affect the use and enjoyment of the aggrieved persons property. It is more than an annoyance.

There is a defined list of issues that fall under the nuisance regime, these are stated specifically in Part 3 of the Environmental Protection Act 1990.

- (a) any premises in such a state as to be prejudicial to health or a nuisance;
- (b) smoke emitted from premises so as to be prejudicial to health or a nuisance;
- (c) fumes or gases emitted from premises so as to be prejudicial to health or a nuisance;
- (d) any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance;
- (e) any accumulation or deposit which is prejudicial to health or a nuisance;
- (f) any animal kept in such a place or manner as to be prejudicial to health or a nuisance;
- [F3(fa)any insects emanating from relevant industrial, trade or business premises and being prejudicial to health or a nuisance;]
- [F4(fb)artificial light emitted from premises so as to be prejudicial to health or a nuisance;]
- (g) noise emitted from premises so as to be prejudicial to health or a nuisance;
- [F5(ga)noise that is prejudicial to health or a nuisance and is emitted from or caused by a vehicle, machinery or equipment in a street [F6or in Scotland, road];]
- (h) any other matter declared by any enactment to be a statutory nuisance;

There are no defined measurements or levels or specific criteria for a statutory nuisance to be compared against. It is for a suitably qualified and competent officer to use his or her judgement bearing in mind the following factors:

- Frequency of occurrence
- Time
- Nature of the locality
- Character of the noise
- Whether Malice is a factor
- Duration
- The impact on the person aggrieved

	<p>If a Local authority is satisfied a statutory nuisance exists, is likely to occur or recur they SHALL serve an abatement notice requiring the abatement of that nuisance. The abatement notice may require such steps to be taken to abate or restrict the nuisance. An abatement notice can be used to prevent a statutory nuisance from occurring ie it can be served before the issue at hand takes place. The level of evidence is of a civil threshold. There is an appeal period of 21 days to the recipient of a notice.</p> <p>If the recipient of the notice fails to comply with the requirements of the notice, without reasonable excuse, he/she will be guilty of an offence. The local authority can either carry out works in default to abate the nuisance or initiate legal proceedings. If the premises is a business undertaking, they have the defence of best practicable means. The level of evidence to prove an offence is of a criminal level i.e. beyond reasonable doubt, and is a summary offence.</p>
1.6	<p>Question 6: How can the public report ASB?</p> <p>The guidance on reporting ASB is available on our website at: Anti-social behaviour » East Suffolk Council. This guidance is as follows:</p> <p><i>We encourage residents to report incidents and share information so that the most appropriate action can be taken at an early stage.</i></p> <ul style="list-style-type: none"> • Online anti-social behaviour reporting form • <i>Council housing reports should be reported directly to your Council housing officer.</i> • <i>Nuisance caused by noise, smoke and rubbish are dealt with by Environmental Protection.</i> • <i>Social housing reports should be reported directly to your housing provider.</i> • Contact our anti-social behaviour team <p><i>There is a Facebook page dedicated to Communities on how to report ASB. Complaints can also be reported by phone via customer services.</i></p> <p>Complaints regarding ESC Properties can be made by emailing estates@eastsuffolk.gov.uk or by phone via Customer Services.</p>
1.7	<p>Question 7: Is there any action taken about understanding/doing something about under-reporting?</p> <p>A lot of work is undertaken by the services involved in responding to ASB to encourage reporting of ASB in a timely and sufficiently detailed manner. It is important that victims use the reporting form on the website (alternative contact routes are available if digital access is an issue) and complete any diary sheets/recording sheets issued to them to ensure that evidence is comprehensive and detailed, and therefore provides a robust basis for further action.</p> <p>Roadshows are held by the Communities Officers in summer months which promote how to report and who to contact depending on the nature of the ASB.</p>

1.8	<p>Question 8: How do we encourage residents to make reports and reassure them that doing so will make a difference?</p> <p>The information on our website (and that of our partners) strongly encourages people to make reports of ASB. The recent transformation project (see 3.1 below) has identified that our website should be reviewed to ensure that we are not over-promising what we can do in terms of responding to ASB issues, explain the tools and powers we have at our disposal, and to make it clear that in most cases the first step in resolving some ASB issues, particularly neighbour disputes, is often for neighbours to try and resolve issues themselves in a polite, non-confrontational and solution focussed way. It is proposed that the review of the website could include some examples of the way that neighbours could raise issues in an appropriate way that this is not likely to escalate tensions.</p>
1.9	<p>Question 9: Does the Council undertake any promotional campaigns around ASB?</p> <p>The Council undertakes a programme of activities, including outreach into our market towns, during ASB Week, which is in July each year. We also promote our work around ASB as part of general marketing activities at events e.g. the Suffolk Association of Local Councils conference at the end of November and the Suffolk Show.</p>
1.10	<p>Question 10: Which teams are involved with ASB in the Council?</p> <p>The ESC response to ASB is primarily delivered by five teams:</p> <ul style="list-style-type: none"> • Estates Management manage the tenanted properties owned by the Council and deal with complaints of anti social behaviour by Council tenants • Environmental Protection deal with a wide range of environmental matters which are defined in the Environmental Protection Act 1990 such as noise from various sources, air quality, smoke nuisance, fly tipping, littering, dog control and light nuisance many of which can also fall into the definition of ASB. However, the resource to deal with the ASB level cases was transferred out of the team a number of years ago to the Communities team and the EP team now primarily focus on investigating and resolving statutory nuisance cases and on providing technical support to the Communities team around ASB noise case as and when able. • Communities predominantly, but not exclusively, deal with privately owned properties, including neighbour nuisance, as well as ASB hotspot areas, usually highlighted via police or though the community safety partnership (CSP). Communities Officers coordinate ASB cases which require a multi-agency approach. • Private Sector Housing deal with, amongst other things, rats/mice, and accumulations of rubbish in domestic premises, which can turn into neighbour disputes • Planning Enforcement Officers deal with ‘High Hedges’ which can cause and arise from neighbour disputes

1.11 **Question 11: Are there any dedicated staff resources for dealing with ASB?**

Within the Communities Team there is a 12-hours a week Senior ASB Officer role and then our eight Communities Officers each deal with ASB cases within the Community Partnership areas that they cover. In addition to this the Team currently has support from an ASB Apprentice. This resource is not sufficient to deal with current levels of demand. The increasing complexity and intransigent nature of ASB cases, particularly neighbour disputes, has exposed some skills gaps. Different resourcing and delivery options are therefore currently being explored.

The Tenant Services team has a dedicated full time Anti-Social Behaviour Officer who deals with all complaints received regarding ESCs Housing Stock.

Environmental Protection – Environmental Protection staff deal with a wide range of complex technical functions including animal, scrap metal, permitted process and premises licensing, private water supplies, contaminated land, air quality, planning consultations, rodents and statutory nuisance investigation into complaints about odour, noise and other forms of pollution.

The Environmental Enforcement officers also have a wide remit which includes fly tipping, graffiti, dog fouling and monitoring compliance with the PSPOs.

Environmental Protection employ authorised officers which empowers them to serve statutory abatement notices and community protection notices. There is a raft of other legislative tools and powers available and used by the EP team that covers an array of scenarios that could be considered anti-social behaviour. The key difference between the legislative powers delivered by the EP and ASB professional officers is that EP deal with premises and not individuals. ASB related legislation and the spirit of the law is to work with people's behaviour wherever they are located and not just confined to premises. For example, this allows for sanctions that can require people to undertake mediation, engage with mental health professionals, or engage with parenting or educational services.

2 Current position

2.1 **ASB Cases**

Question 12: How many ASB cases are reported in East Suffolk annually? (compare number over last 5 years)

Communities Team

Total cases between Jan 1st 2018 - Nov 30th 2023: **1143**

Cases by year (Jan 1 – Dec 31)

2018: **200**

2019: **198**

2020: **250**

2021: **171**

2022: **139**

2023: **185 (as of Nov 30)**

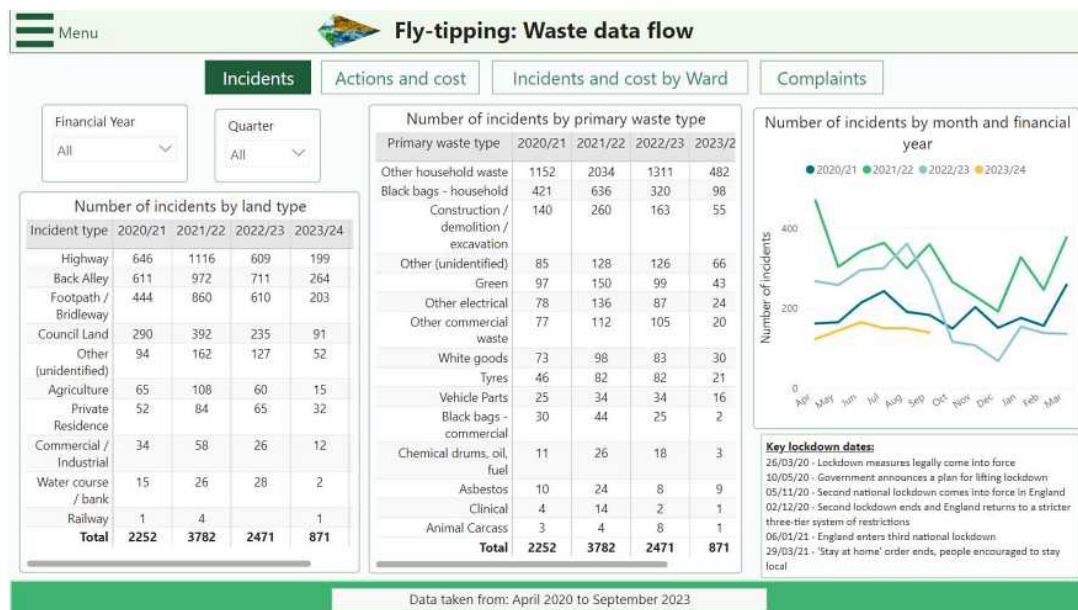
	<p><u>Housing Team</u> Data is not currently collected in a format which allows reporting. Work is already underway to collect and report on this data in the near future.</p>																
2.2	<p>Question 13: How many of each type of ASB have been reported over the last 5 years?</p> <p><u>Communities Team</u> It is difficult to break these down neatly into type, as many cases involve different types of ASB, but a broad overview of the type of ASB cases dealt with by the Communities Team is as follows:</p> <p>75% are neighbour type disputes. 5% Parking and vehicle issues, usually linked to neighbour disputes. 6% Youth related ASB 14% Noise related ASB</p> <p><u>Housing Team</u> Data is not currently collected in a format which allows reporting. Work is already underway to collect and report on this data in the near future.</p>																
2.3	<p>Question 14: Are there any trends/spikes of type?</p> <p><u>Communities Team</u> - Neighbour disputes are the highest number of complaints.</p> <p><u>Housing Team</u> - Data is not currently collected in a format which allows reporting. Work is already underway to collect and report on this data in the near future.</p>																
2.4	<p>Question 15: Are they concentrated in any particular areas of the district? If so, how are they dealt with?</p> <p>Housing Team - The number of ASB cases is much higher in Lowestoft than in other areas of the district, however this is where the highest percentage of our stock is.</p> <p>Communities Team - The number of ASB cases dealt with by the team is also much higher in Lowestoft than in other areas of the district. The table below show a break down by percentage (approximate) of ASB cases in each Community Partnership area:</p> <table border="1" data-bbox="300 1659 1334 1980"> <tr> <td>Lowestoft and Northern Parishes</td> <td>43%</td> </tr> <tr> <td>Felixstowe Peninsular</td> <td>11%</td> </tr> <tr> <td>Beccles, Bungay, Halesworth/surrounding</td> <td>11%</td> </tr> <tr> <td>Aldeburgh, Leiston, Saxmundham/surrounding</td> <td>10%</td> </tr> <tr> <td>Woodbridge, Melton, Deben Peninsular</td> <td>9%</td> </tr> <tr> <td>Kesgrave, Martlesham/surrounding</td> <td>8%</td> </tr> <tr> <td>Kessingland, Carlton Colville, Southwold/surrounding</td> <td>5%</td> </tr> <tr> <td>Framlingham, Wickham Market/surrounding</td> <td>3%</td> </tr> </table>	Lowestoft and Northern Parishes	43%	Felixstowe Peninsular	11%	Beccles, Bungay, Halesworth/surrounding	11%	Aldeburgh, Leiston, Saxmundham/surrounding	10%	Woodbridge, Melton, Deben Peninsular	9%	Kesgrave, Martlesham/surrounding	8%	Kessingland, Carlton Colville, Southwold/surrounding	5%	Framlingham, Wickham Market/surrounding	3%
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2.5

Question 16: From the geographical distribution of cases and the range of case types, can we draw any conclusions about possible causes of ASB and devise any mitigations to prevent it in future?

Lowestoft is our largest and most deprived town (with more than 30,000 people in Lowestoft living within the 'Core 20' most deprived 20% of areas nationally), and therefore it is no surprise that numbers of ASB cases are higher in Lowestoft than other parts of the district. However, the type of ASB complaints varies between areas – entrenched neighbour disputes are reported right across the district, often between more affluent, owner-occupier households.

The table below shows some data about fly tipping in the District:



2.6

Question 17: How many ASB Case Reviews have been requested over the last 5 years? How many have met/not met the thresholds? How many appeals have there been?

What it is an Anti-Social Behaviour (ASB) Case Review?

The Anti-Social Behaviour (ASB), Crime and Policing Act 2014 introduced the Community Trigger to give victims of ongoing Anti-Social Behaviour (ASB) the right to request a review of their case and bring agencies together to take a joined up, problem solving approach to finding a solution. It is now referred to as an Anti-Social Behaviour (ASB) Case Review.

If residents have already reported ongoing Anti-Social Behaviour (ASB) to the Police, ESC or their housing provider and feel that no action has been taken to resolve it, they can request an ASB Case Review. The relevant bodies and responsible authorities who undertake the case review are:

- councils
- police
- Integrated Care Boards in England and Local Health Boards in Wales
- registered providers of social housing

	<p><u>Who can request an Anti-Social Behaviour (ASB) Case Review?</u> An application may either come directly from the victims of anti-social behaviour or from a third party (with the victim’s consent), such as a family member, friend or local elected representative (a councillor or MP). The victim may be an individual, a business or a community group.</p> <p><u>When can an Anti-Social Behaviour (ASB) Case Review be activated?</u> The Anti-Social Behaviour (ASB) Case Review can be used if residents have complained to East Suffolk Council, Suffolk police and/or their housing provider</p> <ul style="list-style-type: none"> • on THREE or more occasions about separate incidents of anti-social behaviour in the past SIX months, and; • reported each incident of anti-social behaviour within ONE month of it happening <p>and feel that no effective action has been taken to resolve their complaints. They must request a case review within SIX months It is important to note that the Anti-Social Behaviour (ASB) Case Review is not an alternative complaints procedure and will not review concerns about service provision.</p> <p><u>ASB Case Reviews in East Suffolk</u> October 2017 to November 2023</p> <p>ASB Case Review Applications: 47 Applications that met criteria: 30 Not met criteria: 17 Appeals (i.e. not happy with the outcome of the Case Review): 7</p>
2.7	<p>Question 18: How do we keep residents ‘safe’ when reporting anti-social behaviour? (Many residents are concerned about their own safety, and also they are concerned about the detrimental effect on any house-sale by having a recorded issue with the neighbours.)</p> <p>Communities Team – Details of complainants are not shared unless they are notified and agree to this information being shared. Discrete visits are undertaken to locations. If Court action is required ‘hearsay statements’ can be used.</p> <p>Environmental Protection – Details of complainants in statutory nuisance cases are always kept confidential and not shared unless it goes to court.</p>
2.8	<p>Question 19: What analysis do we undertake on the motivations of such actions? How long do we work with those complained about to try to help them address their behaviour?</p> <p>All teams responding to statutory nuisance and ASB reports have cases that span multiple years, which are complex and where there is no easy solution to entrenched behaviours and positions. The graduated approach that we adopt means that we work with the alleged perpetrators early and encourage them to consider the impact of their activities on others in their neighbourhood or</p>

	<p>community. Both the Housing and Communities Teams have cases that span multiple years.</p> <p>Often both/all parties involved in a neighbour dispute perceive themselves to be the 'victim' and use similar language about how the way that the other party(ies) are behaving makes them feel.</p>
2.9	<p>Question 20: Is there some kind of system that allows local authorities to check records of 'troubled' individuals or families, who might have moved into or been moved into the area?</p> <p>No, there is no such system. We can request information from police, if deemed necessary, through relevant information sharing agreements.</p> <p>During the process of letting a property via the Gateway to Homechoice scheme, landlord referencing is requested which will flag any previous concerns.</p>
2.10	<p>Question 21: How is it best to report transitory ASB such as large noisy (and potentially threatening) groups gathering in a variety of areas around a community e.g. fast car racing, cyclists doing wheelies, without lights and on the wrong side of the street, and what can be done?</p> <p>As outlined above, the Police have specific dispersal powers that they can use to deal with situations such as those described in the question. They also have section 47 anti social use of motor vehicle legislation that can be issued. As a first step the Police undertake a lot of disruption activity in target areas.</p> <p>It is important to note that some of these examples in the question above wouldn't be considered to be ASB.</p>
2.11	<p>Question 22: How many Public Space Protection Orders do we have in East Suffolk?</p> <p>Communities Team – we have one drinking related Public Space Protection Order (Harbour ward, Lowestoft) which was renewed for the third time earlier this year.</p> <p>Environmental Services team – We have 21 Dog Control Public Space Protection Orders spanning the district covering dogs on leads, exclusion of dogs and dog fouling. They can be found at Dog Control Public Space Protection Orders » East Suffolk Council</p>
2.12	<p>Question 23: What is the mechanism for putting a PSPO in place?</p> <p>See answer to Question 5 above.</p>
2.13	<p>Partnership Working</p> <p>Question 24: Which partners/stakeholders does the Council work with to deal with anti social behaviour?</p>

	<p>The Council works with a range of partners in relation to ASB cases in the district. Key partners are Suffolk County Council, Suffolk Constabulary, Housing Associations and Suffolk Fire and Rescue.</p> <p>Anti-Social Behaviour is one of the priorities identified by the Suffolk Safer Stronger Communities Board and is discussed at their quarterly meetings which are attended by the ESC Cabinet Member as Chair of the East Suffolk Community Safety Partnership. Suffolk County Council convene an ASB Working Group which the senior ASB officer attends on a 6-weekly basis.</p>
2.14	<p>Question 25: Do we have any mechanisms for working with Town and Parish Councils for reporting any ASB?</p> <p>Town and Parish Councils can report ASB using the mechanisms outlined in 1.6 above, but many also have strong relationships with their Communities Officer, and indeed their local Councillor(s), and work closely with them to identify and tackle ASB issues, particularly in the community. We also receive referrals from Councillors (County and District), MPs and other partners.</p> <p>Potentially ASB could be raised under the Community Issues item on the Community Partnership Agendas – there is a good example from the Framlingham and Wickham Market CP area where a specific ASB issue was raised in a particular location and the Community Partnership partners problem solved and came up with a positive solution.</p>
2.15	<p>Question 26: Are there any engagement mechanisms in place with Housing Associations and/or Tenant Associations?</p> <p>Communities Team – Any registered provider (RP) can refer ASB cases via a multi-agency form. The Communities team will coordinate this meeting.</p> <p>Housing Team – Not currently any specific engagement mechanisms that are additional to ongoing partnership working.</p>
2.16	<p>Question 27: How do we engage with the MP to address serious issues?</p> <p>Our three MPs generally contact the Council about individual ASB cases, having been contacted by the ‘victims’ of ASB. However, these cases are often complex with both parties seeing themselves as victims and therefore it is really important to ensure that an empathetic but balanced view is taken of such cases.</p>
2.17	<p>Sanctions</p> <p>Question 28: What action can be taken against an individual perpetrator?</p> <p>See the response to Question 5 in para 1.5 which outlines our Compliance and Enforcement Policy, graduated approach and a detailed overview of the range of tools/powers available to local partners. Each case should be judged on its own merits.</p>

When considering formal action through the courts local authorities (LAs) are required to reach a certain standard of proof. In the case of criminal activity, the burden of proof is “**Beyond reasonable doubt**” meaning the evidence must convince the Courts that there is no other reasonable explanation that can come from the evidence presented.

For civil legal processes (e.g., tenancy management cases) the civil standard of proof is used, where cases must be proved to a “**balance of probability**” standard meaning that a court needs to be satisfied an event occurred or the occurrence of the event was more likely than not.

From the Communities team perspective contact with legal services on ASB cases are very often slow to respond. It is felt by officers they are “risk adverse” when requests are made in relation to enforcement action against perpetrators that are suggested by the team.

2.18 Question 29: How many prosecutions have there been over the last 5 years under the different types of ASB?

In total ESC has prosecuted 18 offences in the last 5 years.

The Private Sector Housing Team haven’t taken any prosecutions, as we have chosen to issue Civil Penalties as an alternative in more recent years. In a recent case where a resident was keeping seagulls and other birds inside their property, the team had an application for a Warrant of Entry as part of the process, but not prosecution.

2.19 Question 30: What sanctions can be given by the Court?

Maximum penalties vary from a £500 fine for failing to comply with an alcohol PSPO to 5 years imprisonment for breach of a Criminal behaviour Order. In theory we could prosecute for death by dangerous dog which carries 14 years imprisonment. These are outlined in more detail below:

Type	Act	Fine
Pests	Section 4 and 5 Prevention of Damage by Pests Act 1949	£1,000 fine
Vehicles	Section 2(1) Refuse Disposal Act 1978	£2,500 fine
Duty of Care	Section 34 Environmental Protection Act 1990	Unlimited Fine
Refuse Notice	Section 47 Environmental Protection Act 1990	£1,000 fine
Abatement Notice	Section 80 Environmental Protection Act 1990	Unlimited Fine
Littering	Section 87 Environmental Protection Act 1990	£2,500 fine
Enforcement Notice	Section 179 Town and Country Planning Act 1990	Unlimited Fine

Maintenance of Land	Section 215 and 216 Town and Country Planning Act 1990	£1,000 fine
TPO	Section 210 Town and Country Planning Act 1990	Unlimited Fine
Animals Sales	Section 13(6) Animal Welfare Act 2006	5 Years Prison
CBO	Section 30 Anti Social Behaviour Crime and Policing Act 2014	5 Years Prison
Dispersal	Section 39 Anti Social Behaviour Crime and Policing Act 2014	3 months prison
CPO - Individual	Section 48 Anti Social Behaviour Crime and Policing Act 2014	£2,500 fine
CPO - Community	Section 48 Anti Social Behaviour Crime and Policing Act 2014	Unlimited Fine
Alcohol	Section 63 Anti Social Behaviour Crime and Policing Act 2014	£500 fine
PSPO	Section 67 Anti Social Behaviour Crime and Policing Act 2014	£1,000 fine
Closure Order	Section 86 Anti Social Behaviour Crime and Policing Act 2014	51 Weeks Prison
Dangerous Dogs – Person Killed	Section 106 Anti Social Behaviour Crime and Policing Act 2014	14 years prison
Dangerous Dogs – Person Injured	Section 106 Anti Social Behaviour Crime and Policing Act 2014	5 Years Prison
Dangerous Dogs – Assistance Dog Injured	Section 106 Anti Social Behaviour Crime and Policing Act 2014	3 Years Prison

3 How to address current situation

3.1 **Question 31: Are there any particular challenges that the Council experiences when dealing with ASB?**

A key challenge is the number and complexity of ASB (including statutory nuisance) cases being reported to the Council. These are often multi-faceted and involve residents who are vulnerable for a range of reasons, including poor mental health, long term health conditions and trauma.

Currently there are a handful of cases which are long-standing, complex, involve multiple teams/agencies and where there isn't an obvious resolution – particularly where the threshold for statutory nuisance is not reached and informal resolutions e.g. Acceptable Behaviour Agreements have broken down. In these cases, both parties regularly make reports to the Police and various Council teams about the actions of their neighbours, often contacting all relevant parties at the same time.

During 2022/23, the Senior ASB Officer in the Communities Team undertook a secondment looking at both the Communities Team and wider Council's response to ASB. Her report was published in June 2023.

Whilst many areas of strength and good practice were identified, some areas of weakness were identified, including the following:

- Multiple teams are involved in dealing with ASB (as outlined above), which increases the potential for ‘hand-offs’ between teams and a lack of clarity for the victims about who does what and who they should report incidents to
- Different procedures for receiving, triaging, and ‘accepting’ a case, leading to the victim potentially having to tell their ‘story’ multiple times - both to ESC departments and/or external agencies
- Different recording systems means that information about cases is not shared as effectively as it could be and is reliant on the strength of relationships between individual officers
- Information on the ESC website tends to be built around ESC functional structures and is not written from the perspective of a service user
- There are different approaches to multi-agency working, with some teams regularly triggering multi-agency meetings for complex cases, whilst others do not
- Not all staff (in the Communities Team predominantly) feel confident in their ability to deal with ASB, in particular high risk ASB
- The Council needs a common standard for enforcement
- There are challenges when ASB occurs in mixed-tenure housing, with artificial boundaries of responsibility between landlords (whose responsibilities only extend as far as their contract with their tenants permits) and agencies exercising statutory functions e.g. ESC and Police who have responsibilities to do so for all involved
- Very few visits to victims are taking place, although many practitioners felt that this would nip a proportion of the cases in the bud early on – the lack of visits is mainly due to lack of capacity/resources
- Where work is undertaken as part of a wider role, as is the case with the Communities Officers who also work on Community Enabling, Community Partnerships, Community Safety and Health and Wellbeing, it can be a challenge to balance the volume and complexity of reactive ASB work with all other, mainly pro-active and preventative, work.

3.2

The ASB Transformation Programme Report include a series of recommendations for improvement to address these improvement areas, which included:

- Ensure ESC ASB web content is up to date, standardised and integrated so that victims receive simple, realistic and consistent ASB information – with regular reviews/updates of content. We need to be clear on the website about what isn’t ASB and the powers that we have at our disposal to deal with both ASB and statutory nuisance
- Review all methods by which victims of ASB can contact ESC services and provide more thorough and consistent data capture at first point of contact to enable better routing of complaints to the relevant service(s).
- Formalise co-operation across the three main services involved in dealing with ASB and statutory nuisance in East Suffolk by assigning a nominated officer from each service (and ideally external agencies) and provide them with the time and resources to fulfil this collaboration role.

	<ul style="list-style-type: none"> • Introduce a wider ASB working group to communicate updates from the SCC working group, ensure legislation changes are disseminated across ESC departments and discuss themes / trends / stuck cases. • Consider forming a co-located ASB team who share information and resources and provide dedicated administrative resource to service the team. • Develop new, aligned ASB practices and procedures to avoid/reduce duplication and ensure that these put the ‘victims’ first. • Develop guidance for internal staff and external agencies to help them correctly identify which cases require a multi-agency approach at an early stage, nominating a ‘lead agency’ and a lead officer as a point of contact for the victim/s of ASB. • All teams to agree common standards of information gathering which, as a minimum, include thorough and diligent recording and reporting. • Arrange regular joint training and awareness sessions with relevant teams and agencies to share best practice and inform staff of legislation, policy, procedural or guidance changes. • Agree a common threshold for escalating cases to a status where they are the subject of regular meetings/case conferences due to the level of potential risk/complexity - a risk assessment matrix (RAM) to assess victim risk used by the Communities Team could facilitate multi-agency case management. • Identify a Legal representative with current knowledge around ASB, particularly non housing tenancy related ASB, to attend ASB case conferences • Review data sharing arrangements between ALL key agencies. Publish in a consistent format, written in a style accessible to front-line staff and subject to regular review and training.
3.3	<p>The short-term proposal to support the implementation of some of the recommendations in the Transformation Report is to seek additional resources within the Communities Team to provide a fixed term Senior ASB Officer role and administrative support to continue work on refinements to corporate processes and collaborative working, and to support/advise the eight Communities Officers in the Communities Team on individual cases, particularly complex ones.</p> <p>The longer-term ambition is to secure external consultancy support to work with us in 2024/25 to identify the best East Suffolk Council structure for delivering an even more effective and efficient ASB service for victims of ASB in East Suffolk, potentially leading to the formation of a single ASB Team.</p>

4 Reason/s for recommendation	
4.1	A significant amount of information has been provided in response to the 31 questions identified as part of the Scoping Report.
4.2	It is really important to recognise that the majority of ASB and statutory nuisance cases are resolved through prevention and early intervention approaches. There are, however, always opportunities to improve our service and these opportunities are therefore the focus of the Section 3 of this report.

Appendices

Appendices:	
Appendix A	Suffolk Constabulary Briefing Note

Background reference papers:		
Date	Type	Available From
	None	