HOUSING MANAGEMENT ADVISORY BOARD - 11TH NOVEMBER 2020

Report of the Head of Landlord Services

ITEM 5 CORPORATE ANTI SOCIAL BEHAVIOUR AND HATE INCIDENT POLICY 2020-2024

Purpose of Report

To provide an opportunity for the board to comment on a draft Corporate Anti-Social Behaviour and Hate Incident Policy 2020-2024 prior to its likely progression to Cabinet for approval.

Recommendation

That the board comment on the draft policy at Appendix 1.

Background

A number of services across the Council deliver activities to prevent and manage (ASB); including: Community Safety, Landlord Services, Street Management, Environmental Protection, Planning Enforcement, Private Sector Housing, and Cleansing and Open Spaces. A review of the Council's ASB services has recently been concluded. As a result there will be closer working across teams.

The Council's existing ASB specific policy relates solely to delivery of the Council's Landlord function. Whilst minor amendments have been made over the years, the policy has not been significantly updated since the management of the Council's housing stock returned to the Council in 2012. Given the range of services involved in preventing and managing ASB it is desirable to introduce a new policy with a broader scope setting out, on a corporate basis, the Council's responsibilities around ASB and hate incidents, and bringing ASB teams together under a clear policy framework for the delivery of services in this respect. The policy reflects best practice principles.

Should it be approved by Cabinet, the new corporate policy will support the use of the full range of tools and powers available under the Anti-Social behaviour Crime and Policing Act 2014, and compliance with the statutory requirement under the Act for local authorities to publish a community trigger process. The trigger is a mechanism for victims of persistent anti-social behaviour to request that relevant bodies undertake a case review.

The policy supports compliance with the Housing Act 1996 which provides a duty on local authority landlords to prepare a policy and summary policy in relation to ASB, along with a published statement. This requirement is further reflected in the Homes and Communities Agency (2012) *Neighbourhood and Community Standard* which sets out that registered providers of social housing will *publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour (ASB) in areas where they own properties*.

The policy will positively contribute toward the effective management of ASB and hate incidents, and consequently compliance with the Council's responsibilities under Section 17 of the Crime and Disorder Act (1998) to undertake reasonable action to improve community safety in the Borough.

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Charnwood Borough Council Corporate Anti-Social Behaviour and Hate Incident Policy 2020-2024

Version 3.0 DRAFT October 2020

Next review date: April 2024

Introduction

Charnwood Borough Council recognises that residents are entitled to live in a quiet and peaceful environment free from anti-social behaviour (ASB) and hate incidents. For the vast majority of residents, ASB is not an issue. However, where it does occur, ASB can have a devastating impact on the quality of life for residents if not dealt with.

Whilst the Council aims to resolve ASB through informal action, the safety of residents is taken very seriously, and the Council will tackle anti-social behaviour effectively, using court proceedings where it is appropriate to do so to protect our residents.

The Anti-Social Behaviour, Crime and Policing Act 2014 introduced new powers to tackle ASB and provide better protection for victims and communities. This included faster routes to gaining possession of a property where serious ASB has occurred, and extended the use of civil injunction to minors.

This Policy will ensure that the full range of legal remedies is available to the Council when tackling ASB, and will place victims and communities at the heart of its response. This approach is in line with the intention of the legislation.

In managing ASB and hate-related incidents, a firm but fair, transparent and consistent approach will be adopted. The needs and circumstances of vulnerable residents and perpetrators will be taken into account and, where appropriate referrals for support may be made.

1. Executive Summary

Charnwood Borough Council has the highest population of any district in Leicestershire outside of the City of Leicester, and is estimated to be 180,000.

Loughborough is a university town, and therefore, has a high student population. The Council works in partnership with the University to deal with incidents of anti-social behaviour and nuisance involving students.

The Council owns and manages approximately 5,700 rented homes, 310 leasehold flats and 21 leased shops, and has a responsibility to investigate anti-social behaviour, and enforce conditions of tenancy by all legal means possible.

The Council's Corporate Strategy 2020-24 incorporates three themes; one of which is "Healthy Communities". The Strategy states that:

We will continue to work with partners to make our towns and villages safer places to live, work and visit. We will support our communities by delivering a range of services which not only help residents, but also empower them to make a positive difference in their local areas. Community cohesion will remain a priority. We want healthy and happy residents and therefore we are committed to providing high-quality leisure facilities and sports activities for people and offer services to improve

wellbeing, either directly or with our partners. We are passionate about improving housing in the social and private sector and helping those in need of accommodation. We will continue to invest in our council homes and work with developers and the privately-rented sector to ensure high-quality homes are available to residents.

The Council works in partnership with both statutory and non-statutory agencies in order to resolve ASB and to ensure that both victims and perpetrators receive the relevant support.

The definition of ASB contained in the Anti-Social Behaviour, Crime and Policing Act 2014 is used by this policy as the fundamental basis for defining unacceptable behaviour. ASB can cause distress and can affect the quality of life for residents. This Policy outlines the Council's approach to taking effective action both to prevent and tackle ASB.

The Council has a duty of care to victims of crime and ASB and is required to meet regulatory and legislative guidance.

2. Scope and purpose of this document

This document sets out the Council's responsibilities and how it deals with ASB.

This document does not say how the Council will deal with ASB on a day-to-day basis. This is explained in the following Policies (and any accompanying Procedures) which should be read alongside this document.

- Charnwood Community Safety Partnership Plan 2020-23
- Charnwood Borough Council Corporate Enforcement Policy
- Regulatory Services Enforcement Policy

3. What is Anti-Social Behaviour?

The Anti-Social Behaviour, Crime and Policing Act 2014, defines ASB as:

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

ASB can affect different people and communities in different ways. Actions that may seriously distress one individual or community may not affect or bother another individual or community at all. Incidents of ASB will, therefore, be considered and dealt with on a case-by-case basis.

Types of anti-social behaviour are wide ranging and can take many forms. Examples include (but are not limited to):

- Noise (such as loud televisions and music, persistent, unnecessary or excessive noise, shouting or yelling, frequent loud parties, dogs persistently barking)
- Rowdy and inconsiderate behaviour
- Harassment
- Verbal or written abuse
- Threats or aggressive behaviour
- Vandalism
- Drug-related nuisance
- Dog fouling
- Keeping and failing to control an aggressive dog
- Dumping rubbish and littering

Abusive language and the use of or threatened use of violence against any Council officers, councillors or agents also falls within the definition of ASB.

Not all reports of noise can be deemed to be ASB. Those noises that arise out of the ordinary and reasonable use of a property are neither breaches of tenancy nor likely to constitute a statutory nuisance. They therefore cannot be subject to enforcement action, unless they are specifically precluded by the terms of the tenancy agreement or lease or the noise is considered unreasonable for other reasons.

Noise measuring equipment can be used to establish a pattern of behaviour and to illustrate the level of intrusion being experienced. Examples of noise that are unlikely to fall within the definition of ASB may include (but are not limited to):

- Footsteps
- General talking
- Moving furniture, banging doors, and running up and down stairs
- DIY and car repairs unless they are taking place at unsocial hours (e.g. late at night or early hours)
- Toilets flushing
- Using a washing machine or vacuum cleaner
- Crying babies
- Children playing

Cooking odours may not fall in to the definition of ASB. It may not be reasonable/possible to take enforcement action against children playing ball games unless the children are engaged in behaviour including (but not limited to), verbal abuse, criminal damage, damage to Council landscaping or / property or more serious nuisance.

All complainants have a responsibility not to make malicious complaints about their neighbours, visitors or anyone engaged in lawful activity around their property. The Council takes malicious complaining very seriously and will usually take appropriate and proportionate action against anyone found to be doing so.

The Council defines a victim of ASB as follows:

The particular person who (in the opinion of the Council's officer) seems to have been affected, or principally affected, by the perpetrator's anti-social behaviour.

The Council defines a repeat victim of ASB as follows:

A person is a repeat victim if, within the last six months - They (as an individual) have complained to the Council, Police or a Registered Housing Provider (social landlord) about three separate incidents of ASB within the Charnwood area.

4. Definition of Hate Related Incidents

The Council defines a hate incident as any non-crime incident which is perceived by the victim or any other person, to be motivated by hostility or prejudice on the grounds of:

- race
- religion
- sexual orientation
- disability
- transgender identity
- · any other perceived difference

An incident or / offence may be physical, verbal or written and can take many forms including:

- Physical attack, such as, physical assault, damage to property, offensive graffiti
- Threat of attack including offensive letters, abusive or obscene calls or texts
- Verbal abuse or insults
- Offensive leaflets and posters, hate mail, abusive gestures, or dumping of rubbish outside homes
- Harassment, bullying and victimisation

5. The Council's ASB responsibilities

The Council has a wide range of responsibilities to tackle ASB, including:

• The Council's role as part of the Community Safety Partnership

Under the Crime and Disorder Act 1998, the Council must work with the Police and other agencies to reduce crime and anti-social behaviour in

Charnwood. The Community Safety Partnership seeks to identify and prioritise the community safety issues that affect our communities, and has a duty to formulate and implement a strategy to prevent crime and disorder.

The Council will investigate ASB and hate-related incidents.

The Council's role in protecting the environment

The Council has a range of responsibilities to deal with environmental ASB including noise, dog control, graffiti, litter, dumped rubbish, abandoned vehicles, noise, accumulations, bonfires, dust, smoke, odour, light, house and vehicle alarms, poor state of premises and kept animals (this list is not exhaustive). These responsibilities arise from a number of Acts and local byelaws, but in particular from the Environmental Protection Act 1990 and the Anti-Social Behaviour, Crime and Policing Act 2014.

• The Council as a social landlord

As a landlord, the Council has a duty under the Anti-Social Behaviour Act 2003 to have a published statement of policy and procedures in relation to ASB.

Under its Conditions of Tenancy, the Council manages ASB and hate related incidents where the complainant/victim or perpetrator is a tenant or Leaseholder of Charnwood Borough Council and/or where the Council's housing management functions are affected by the behaviour. The Council's landlord duties and powers are different from, and usually act in addition to, the duties and powers to take action against those causing ASB under the Anti-Social Behaviour, Crime and Policing Act 2014.

The Council's role as a local Planning Authority

The Council manages high hedge complaints under the 2003 Anti-Social Behaviour Act. The law requires that people take all reasonable steps to try to settle their high hedge dispute for themselves before making a complaint. The Council will determine whether, in the words of the legislation, the hedge is adversely affecting the reasonable enjoyment of the complainant's property and find a balance between the competing interests of the complaint and the hedge owner, as well as the interests of the wider community. The Council has legal powers available to control the tidiness/appearance of land and buildings, but this would usually be a last resort after attempting to reach a resolution with the landowner first. If a resolution still cannot be achieved the Council may take enforcement action through the planning process. The Council can serve an Untidy Site Notice (also known as a Section 215 notice) on the owner or occupier when the poor condition and appearance of the building or land have a detrimental effect on the surrounding area or neighbourhood.

Inter-agency relationships and a joined up approach are critical to the successful delivery of ASB services. The Council works in partnership with other agencies

including (but not limited to) Leicestershire Police, other local authorities, Social Services, mental health teams and other areas of the National Health Service, and a range of non-statutory services where necessary.

6. The Council's objectives

The Council will put victims and communities at the heart of its response to dealing with ASB and hate related incidents, and will support residents to live peacefully in their homes without unreasonable disturbance from ASB. This will be achieved by:

- Playing a full part as a key member of the Charnwood Community Safety Partnership.
- Participating in relevant strategic or preventative initiatives.
- Adopting a multi-agency approach and working with partner agencies such as the Police, Probation, Social Services and Youth Services.
- Discouraging ASB through preventative measures including partnership working, CCTV, and door entry systems (for Council tenants only), and using a range of early intervention tools and techniques to prevent ASB from escalating and to resolve cases quickly.
- Explaining reasons should the Council choose to take no action, and advise on self-help or other alternative courses of action whenever it is possible and appropriate to do this.
- Using any of the tools and powers available to the Council under the law and Council Policy, according to officers' professional judgement.
- Referring cases to a mediation service where appropriate.
- Monitoring complaints around the services that the Council provides. These
 will be reviewed, and the Council will use feedback to contribute to the
 process of continual learning.
- Working with residents, partner agencies, elected members and the Community Safety Partnership to identify ASB hotspots. The Council will use this information to target resources; for example by setting up or attending a working group to deal with individual and / or location-based issues and address community concerns.
- Providing regular updates to communities about actions taken to tackle antisocial behaviour. In particular the Council will publicise, where permitted, enforcement actions such as Anti-Social Behaviour Orders, Anti-Social Behaviour Injunctions and Closure Orders.

- Providing residents with a swift and simple means of complaining, directly to the Community Safety Partnership, if effective action is not taken by local agencies through existing channels, to tackle issues of anti-social behaviour.
- Providing support and assistance to help victims and witnesses of anti-social behaviour, having particular regard for those identified as being vulnerable.
 Where appropriate the Council will make referrals for support to victims, witnesses and perpetrators of ASB.
- Taking complaints of anti-social behaviour seriously; recording and investigating them all, providing updates to all involved parties. In all reported cases a threshold assessment will be made based upon both the necessity and proportionality of any proposed intervention.
- Whilst addressing community concerns, the Council will work with partner agencies to access appropriate support to help perpetrators address their behaviour, and to support those affected by unacceptable behaviour, leading to the best possible outcome for all.

7. The Council's approach to dealing with ASB

Charnwood Borough Council adopts an incremental approach when dealing with ASB. The purpose of the incremental approach is to manage ASB in a consistent and proportionate manner. The incremental approach is summarised at Appendix 2.

Action will be decided based on the circumstances of each case and will be proportionate to the behaviour exhibited, taking into account any vulnerabilities.

The Council will aim to resolve the majority of ASB cases through non-legal means, and may use a range of early intervention tools and techniques to prevent ASB from escalating and to resolve cases quickly.

Some of the options available to the Council when dealing with ASB include, but are not limited to, the following:

Non-Legal Stage

- Advice verbal and written
- Warnings verbal and written
- Community Protection Warning Letters
- Acceptable behaviour contracts
- · Good neighbour agreements
- Parenting contracts/agreements
- Mediation

Legal Stage

- Civil Injunctions
- Community Protection Notice

- Closure Order
- Criminal Behaviour Order
- · Parenting contracts and parenting order
- Possession proceedings and eviction (for Charnwood Borough Council Tenants)
- Public Spaces Protection Order
- Demoted tenancy (for Charnwood Borough Council Tenants)
- Noise Abatement Notice
- Prosecution
- Seizure of items or equipment

In certain circumstances, another agency may be better placed to deal with the behaviour. Examples may include (but are not limited to) where there is a criminal element and the Police would be best placed to lead. The Council will support our partners in their investigation and action in these instances.

Criminal behaviour, damage and vandalism cases may be referred to the Police. Where the perpetrator is known, the Council may pursue the costs of repair to Council owned properties and buildings through legal action if necessary. This Policy commits the Council to dealing with ASB in the Borough of Charnwood in a way that will always be fair and, in all important respects, consistent across cases of a similar kind. However, each ASB case the Council deals with is likely to be unique in some or other aspect and the Council therefore reserves the right where appropriate and proportionate to do so to take immediate legal action, incuding (bot not limited to) cases of assault against staff or contractors.

In cases where complainants will not or cannot provide relevant details, for example, details of perpetrators, evidence, or where complaints are anonymous, this is likely to limit the Council's ability to respond effectively. Cases will be closed where there is insufficient evidence on which to base further action.

Investigations may require (for example) discussions with other agencies, such as Leicestershire Police, in order to try to identify perpetrators.

8. Reporting ASB, and Support for Complainants/Victims, and Witnesses

The Council will provide a variety of methods for people to report incidents of ASB and hate related incidents. This includes:

- By telephone via the Council's Contact Centre
- In person
- Email or letter
- On-line form

The contact details for the Council's ASB services can be found at Appendix 1.

The Council will respond to reports of ASB in line with the timescales detailed in its procedures.

The Council will assess victim and overall case risk throughout the life of a case. The Council will consider factors including (but not limited to) the threat of or actual violence, whether the case is hate related, vulnerability, repeat victimisation, mental health, disability, and substance misuse. The Council will consider the context of the case and the impact of the behaviour on victims and communities.

The Council will take appropriate action to mitigate risk. The Council may refer victims to specialist victim support services where appropriate. If the complainant/victim/witness is a Charnwood Borough Council tenant where appropriate, the Council may provide tenancy related support through the in-house Tenancy Support Team. Where appropriate the Council may refer victims to support agencies including (but not limited to) Supporting Leicestershire Families, The Bridge Housing Services, Social Services, drug and alcohol, and mental health services.

Where the Council's witnesses attend court, the Council will endeavour to accompany them, and where appropriate the Council will liaise with the courts to minimise any distress and associated risks. The Council will cover any reasonable expenses incurred by its witnesses attending court.

Where appropriate the Council will provide additional security to residents experiencing ASB and/or a hate related incident/s. This may be subject to assessment and recommendation by a Police Crime Prevention Officer or equivalent.

The Council will remove offensive hate graffiti within 24 hours of receiving the report.

9. Support for Vulnerable Perpetrators of ASB

Whilst the needs of victims and witnesses come first, the Council will seek to identify perpetrator vulnerabilities and needs. The Council may work in partnership with specialist external agencies to achieve this.

The Council recognises that factors including mental health and substance misuse may be linked to the ASB. Perpetrators may be referred to an appropriate support agency, statutory agency (e.g. Social services or Health), or support provided by the in-house Tenancy Support Team (the support from the in-house Tenancy Support Team is only available to Charnwood Borough Council tenants).

The Council will use its *Alternative Incremental Process* to identify and recognise the support needs of young people with developmental difficulties, including, but not limited to autism. The Council will adapt its approach in response to the needs of these young people.

The Council will take enforcement action where perpetrators fail to engage with support services and/or where behaviour does not improve to an acceptable level.

10. Training and powers for Council officers responsible for dealing with ASB

Officers directly involved in dealing with ASB will be provided with training on policies, procedures, and legislation, as appropriate to their role.

Council officers undertaking enforcement activity will be duly authorised under the Council's scheme of delegation.

11. Complaints and the Community Trigger

The Council aims to provide an efficient and good quality ASB service to all its customers, but on some occasions people may be dissatisfied.

The Council has a complaints procedure which should be the first point of call for people that are dissatisfied with the service they receive. More information about the Council's complaints procedure can be found on the Council's website.

At any time, a person can refer a complaint to their local Councillor.

Community Trigger

Introduced through the ASB, Crime and Policing Act 2014, the Community Trigger is a process that gives victims and communities the right to request a review of actions taken, where they believe an ongoing problem has not been adequately addressed.

The Community Trigger is not a first port-of-call; it is only to be used if the complainant believes that there has been a failure to respond adequately to the complaint. Applications can and will be rejected if they are thought to be prejudicial, discriminatory, malicious, unreasonable, vexatious or frivolous.

The Community Trigger can be used in the following situations:

- If an individual has complained to the Council, Police or a Registered Housing Provider about three separate incidents of ASB in the last six months.
- If three individuals in the local community have complained separately to the Council, Police or Registered Housing Provider in the last six months about the same incident of anti-social behaviour in the locality.
- If an individual has been a victim of a single hate crime or incident in the last six months.

For a Community Trigger to be considered the individual must have made a complaint within one calendar month of the incident occurring and must request the Trigger to be activated within six months of the date of that initial complaint.

Once an individual has asked for a Community Trigger to be activated, the Council's Community Safety Manager will acknowledge the request within five working days.

The Council's Community Safety Manager will ask the agencies involved to provide details of the individual's complaint and actions they have considered and taken to date. The manager and officers from partner agencies will look at this information and decide whether a Community Trigger should be activated. If it does not meet the threshold the individual will be informed with an explanation on how the decision was reached. If it does meet the threshold a meeting will take place between officers from the appropriate agencies and partners involved in the case to discuss the ASB and what actions have been considered and taken. The group will review how the Partnership has responded and draft a report of its findings

A response will be sent to the individual by the Council's Community Safety Manager, explaining the action taken and also making recommendations for any further action that may be necessary for the Partnership to take to resolve the antisocial behaviour.

If the individual is not entirely satisfied with the response they receive they have the right to an appeal. In the event of an appeal, individuals should contact the Chair of the Community Safety Partnership, who will arrange a meeting of senior officers of the Partnership in order to discuss the case further.

More information around the Community Trigger, including how to activate it can be found at Appendix 3.

12. Information Sharing and Confidentiality

The Council complies with the requirements of data protection legislation in force and has a data protection policy which can be found on the Council's website.

The Council will share information in line with legislation between partners to adopt a multi-agency approach to tackling ASB; to identify vulnerability and reduce risk, threat and harm to individuals and communities.

There may be circumstances where the Council cannot preserve confidentiality, even when the data subject has requested that we do so. Examples may include (but are not limited to) where a criminal offence has been committed, where someone is a risk to themselves or others or where safeguarding concerns have been identified. When Court proceedings are issued the information will be in the public domain and therefore confidentiality cannot be preserved.

13. Equality and Diversity

The Council will treat all customers with fairness and respect. The Council has an ethical and legal duty to advance equality of opportunity and prevent discrimination.

In relation to the landlord role, before taking legal action, the Council will undertake an *Equality Act 2010 Pre-Action Checklist*. This will ensure that discrimination does

not occur and that interventions are appropriate, necessary, in pursuit of a legitimate aim, risk is considered and appropriately managed and relevant support provided. The principals of the Equalities Act 2010 will be applied in all Council led action.

All information about the Council's services can be made available in a variety of formats, and translated in to relevant community languages on request.

The Council has an easy read diary sheet which can be issued to people who are unable to complete the standard diary sheets and a Dictaphone can be provided if there are issues with reading and writing.

The Council will comply with its Equality Strategy which is available at:

https://www.charnwood.gov.uk/pages/plansandpolicies

14. Policy Development

This policy will be reviewed every four years, or when there are significant changes in legislation or context.

Significant changes in legislation affecting this policy (and therefore the Council's response) will be adopted on a case by case basis where it is appropriate to do so (pending full review of this policy).

Appendix 1 - How to Report ASB / Service Contact Details

Reporting ASB as a home owner or privately renting tenant

Where the victim / complainant own their property or are privately renting, ASB can be reported to the Council's Community Safety Team.

Telephone: 01509 634533

Email: Community.safety@charnwood.gov.uk

Online:

https://www.charnwood.gov.uk/pages/reporting asb as a home owner or privately renting tenant

Reporting ASB as a Council tenant or about a Council tenant

Where the victim / complainant is a Council tenant or the complaint is about a Council tenant, ASB can be reported to the Council's Landlord Service.

Telephone: 01509 634666

Email: contactcentre@charnwood.gov.uk

Online:

https://www.charnwood.gov.uk/pages/reporting asb as a council tenant or about a council tenant

Reporting environmental ASB to the Street Management Team and Environmental Protection Team

Telephone: 01509 634636

Email: env.health@charnwood.gov.uk

Online: https://www.charnwood.gov.uk/pages/noisenuisance

Reporting ASB in relation to high hedges to the Planning Enforcement Team

Telephone: 01509 634570

Email: development.control@charnwood.gov.uk

Online: https://www.charnwood.gov.uk/pages/highhedgescomplaints

Advice - Letter/Verbal

Issued to highlight incidents of ASB which have raised concern

Warning Letter

Issued to highlight a person's ongoing or more serious involvement in ASB and request for this behaviour to stop.

Acceptable Behaviour Contract

Issued to address a person's ASB and to support them in stopping this behaviour.

Legal Stage

Civil Injunction

A civil remedy intended to stop or prevent individuals engaging in ASB.

Criminal Behaviour Order

Court order issued against a person involved in persistent ASB to protect the public from harassment, alarm or distress.

Closure Notice/Order

Designed to allow the Police and Local Authority to quickly close a premises being used, or likely to be used to commit nuisance or disorder.

Other possible sanctions include:

- Community Protection Notice
- Demoted tenancies
- Possession Order
- Injunction against unlawful use of premises
- Exclusion Order and power to arrest

N.B - A person can enter the incremental approach at any stage. The action taken will be decided based on the circumstances of each case. The actions listed at this appendix item are not intended to represent an exhaustive list.

Appendix 3 - Community Trigger Activation

In order to activate the Community Trigger a completed community trigger form is required. The online activation from, along with more information about the process, can be found at:

https://www.charnwood.gov.uk/pages/community_trigger_process

Alternatively a paper copy can be downloaded via the same web address, completed, and posted to the following address:

Community Safety Manager Charnwood Borough Council Council Offices Southfields Road Loughborough LE11 2TX