



Comhairle Chontae na Gaillimhe  
Galway County Council

# **GALWAY COUNTY COUNCIL**

## **ANTI-SOCIAL BEHAVIOUR**

### **STRATEGY 2021**

**ITEM NO.**

**CONTENTS**

**PAGE NO.**

|            |                                                              |                |
|------------|--------------------------------------------------------------|----------------|
|            | <b>MISSION STATEMENT</b>                                     | <b>1</b>       |
| <b>1.</b>  | <b>Introduction</b>                                          | <b>1</b>       |
| <b>2.</b>  | <b>Legislation</b>                                           | <b>1</b>       |
| <b>3.</b>  | <b>Objectives</b>                                            | <b>2</b>       |
| <b>4.</b>  | <b>What is Anti-Social Behaviour - Definitions</b>           | <b>2</b>       |
| <b>5.</b>  | <b>Categorisation of Complaints of Anti-Social Behaviour</b> | <b>3 - 4</b>   |
| <b>6.</b>  | <b>Allocation of Tenancies</b>                               | <b>5</b>       |
| <b>7.</b>  | <b>Pre-Tenancy Training/Induction</b>                        | <b>6</b>       |
| <b>8.</b>  | <b>CCTV</b>                                                  | <b>6</b>       |
| <b>9.</b>  | <b>Action Plan</b>                                           | <b>7- 9</b>    |
| <b>10.</b> | <b>Dealing with Complaints</b>                               | <b>10 - 14</b> |
| <b>11.</b> | <b>Appeals</b>                                               | <b>14</b>      |
| <b>12.</b> | <b>Request to Transfer</b>                                   | <b>14</b>      |
| <b>13.</b> | <b>Council Employees</b>                                     | <b>15</b>      |

## **APPENDICES**

- A. Anti-Social Behaviour Complaint Form**
- B. Sample written confirmation of Verbal Warning Letter**
- C. Sample First Breach of Tenancy Letter**
- D. Sample Second Breach of Tenancy Letter**
- E. Sample Statutory Tenancy Warning**

## **Mission Statement**

**The aim of Galway County Council's Anti-Social Behaviour Strategy is to create stable and sustainable communities by working towards the elimination of anti-social behaviour in Council properties and estates.**

### **1. INTRODUCTION**

Anti-social behaviour can have an adverse effect on the quality of life of our tenants and can threaten the sustainability of communities. The Council recognises that the majority of our tenants are law-abiding and only a small number of households are involved in such behaviour.

Galway County Council will not tolerate anti-social behaviour. Appropriate steps will be taken to deal with such behaviour to include enforcement action where necessary. A multi-agency approach is required to deal with anti-social behaviour.

The Anti-Social Behaviour Policy is underpinned by the Tenancy Agreement signed by the Tenant and Galway County Council in accordance with the Housing Acts 1966 to 2014.

### **2. LEGISLATION**

Section 35 of the Housing (Miscellaneous Provisions) Act 2009, which was enacted on the 1<sup>st</sup> of December 2009, provides for the legislative framework and guidelines for all Local Authorities to adopt, by reserved function, an Anti-Social Behaviour Strategy for the prevention and reduction of anti-social behaviour in its housing stock. The Housing (Miscellaneous Provisions) Act, 2014 and other legislation required necessary amendments to Galway County Council's Strategy.

The Strategy applies to the parts of the administrative area of the Council in which are situated—

- (a) dwellings let by the housing authority to tenants under the Housing Acts 1966 to 2014,
- (b) dwellings which are the subject of Chapter 4 tenancy agreements,
- (c) dwellings in which relevant purchasers (within the meaning of section 1 of the Housing Miscellaneous Provisions) Act 1997) reside, and
- (d) sites (within the meaning of section 1 of the Housing (Miscellaneous Provisions) Act 1997).

### 3. OBJECTIVES

The objectives of this Strategy are:

- To prevent and reduce anti-social behaviour.
- To investigate all complaints of anti-social behaviour fairly and impartially.
- To pursue legal remedies when appropriate.
- To adopt a multi-agency approach to deal with anti-social behaviour.
- To engage with communities so as to prevent anti-social behaviour.
- To use all available resources within the Council to assist in the prevention of anti-social behaviour.
- To operate good tenancy and estate management.
- To advance IT Systems which will support the work of those involved in dealing with anti-social behaviour.
- To provide CCTV in high priority estates to prevent anti-social behaviour.

### 4. WHAT IS ANTI-SOCIAL BEHAVIOUR? - DEFINITIONS

**Anti-Social Behaviour** is defined in the Housing (Miscellaneous Provisions) Act 2014 as one or both of the following:

- (a) The manufacture, production, preparation, importation, exportation, sale, supply, possession for the purposes of sale or supply, or distribution of a controlled drug (within the meaning of the Misuse of Drugs Acts 1977 to 2007),
- (b) any behaviour which causes, or is likely to cause, any significant or persistent danger, injury, damage, alarm, loss or fear to any person living, working or otherwise lawfully in or near a house provided by a housing authority under the Housing Acts 1966 to 2014, or Part V of the Planning and Development Act 2000, or a housing estate in which the house is situate and, without prejudice to the foregoing, includes:
  - (i) violence, threats, intimidation, coercion, harassment or serious obstruction of any person,
  - (ii) behaviour which causes any significant or persistent impairment of a person's use or enjoyment of his or her home, or
  - (iii) damage to, or defacement by writing or other marks, of any property, including a person's home.

**While particular incidents can fall within both anti-social and criminal classifications it is important to state that the Local Authority's role is to pursue incidents through the anti-social provisions of the Housing Acts and An Garda Sichuan's role is to pursue incidents through criminal justice mechanisms.**

## 5. CATEGORISATION OF COMPLAINTS OF ANTI-SOCIAL BEHAVIOUR

For the purposes of defining and monitoring different types of anti-social behaviour, the Council will use the following categories. Some of these complaints will come within the definition of Anti-Social Behaviour as defined within the 1997 Act as amended and some will be outside the definition but entail breaches of the Tenancy Agreement.

**Category A** - The manufacture, production, preparation, importation, exportation, sale, supply, possession for the purposes of sale or supply, or distribution of a controlled drug (within the meaning of the Misuse of Drugs Acts, 1977 (as amended)).

**Category B** - Any behaviour which causes or is likely to cause any significant or persistent danger, injury, damage, loss or fear to any person living, working or otherwise lawfully in or in the vicinity of a house provided by a housing authority under the Housing Acts 1966 to 2014, or a housing estate in which the house is situate and without prejudice to the foregoing includes violence, threats, intimidation, coercion, harassment, racism, vandalism, public order, illegal occupation/squatting or serious obstruction of any person.

**Category C** – Any breaches of those terms within the tenancy agreement that do not fall within Category A and B as outlined. This may include, but is not limited to, damage to property, accumulation of refuse, disturbance, noise, nuisance, graffiti, animal nuisance, boundary/parking disputes.

Some complaints in Category C may not constitute anti-social behaviour as defined, but the behaviour complained of may nonetheless constitute a breach of the tenancy agreement by the tenant and in those cases, the Council may take action against the tenant.

### Categories of complaints

|                                                                                   |            |
|-----------------------------------------------------------------------------------|------------|
| Drug dealing as defined by Section 1 Housing (Miscellaneous Provisions) Act, 1997 | Category A |
| Violence                                                                          | Category B |
| Threats/intimidation/coercion/harassment                                          | Category B |
| Racism                                                                            | Category B |
| Vandalism                                                                         | Category B |
| Public Order                                                                      | Category B |
| Serious obstruction of any person                                                 | Category B |
| Illegal occupation                                                                | Category B |
| Racism                                                                            | Category B |
| Damage to property                                                                | Category C |
| Refuse accumulation                                                               | Category C |
| Noise/disturbance/nuisance                                                        | Category C |
| Animal Nuisance                                                                   | Category C |
| Boundary/Parking disputes                                                         | Category C |

## **NOISE**

- Where complaints of noise from a dwelling cannot be resolved then a complainant can make an application to the District Court for a Noise Abatement Order in accordance with **Section 108, Environmental Protection Agency Act, 1992.**

Complaints regarding significant and persistent noise which affects more than one neighbour will be investigated and may be viewed as a breach of the tenancy agreement.

- Excessive dog barking that causes a nuisance is an offence. Where the dog owner has not made adequate attempts to control the noise the complainant may make a complaint to the District Court under Section 25 of the Control of Dogs Act 1986. Before the complaint is made, he shall serve notice in the prescribed form on the owner of the dog.

## **REFUSE**

Complaints regarding the accumulation of refuse and illegal dumping will be jointly investigated with the Community Warden and the Environment Section of Galway County Council. The accumulation of refuse is considered a breach of tenancy. Enforcement action by the Environment Section may also be appropriate.

## **6. ALLOCATION OF TENANCIES**

Section 15 Housing (Miscellaneous Provisions) Act 1997 allows Local Authorities to obtain information from another housing authority or a specified person in relation to any person seeking a house from the authority or residing or proposing to reside at a house provided by the authority or whom the authority considers may be or may have been engaged in anti-social behaviour. A specified person means any of the following:

- (a) The Criminal Assets Bureau;
- (b) A member of the Garda Síochána;
- (c) The Minister for Social Welfare;
- (d) A health board; or
- (e) An approved body

Galway County Council will use this legislation to vet all social housing applicants and other persons deemed relevant to the allocation of the tenancy. Vetting procedure, including an Allocation Matrix is in place to support this process. The Allocation Matrix is intended to assist and inform the decision-making process with regard to the allocation of social housing.

Protocols are in place to protect the information in accordance with the requirements of General Data Protection Regulations.

Pursuant to Section 14 of the Housing Act 1997, as amended, the Council may refuse to allocate or defer the allocation of a dwelling or refuse to permit a person, or defer permitting a person, to take up or resume residence or enter or be in a dwelling if

- (i) it considers that any member of the household is engaged in or has been engaged in anti-social behaviour or that an allocation to that household would not be in the interest of good estate management or
- (ii) the household fails to provide information, including information relating to members residing together or proposing to reside together as part of the household, which is requested by the Council and which the Council considers necessary in connection with the allocation
- (iii) the authority considers that the person is or has been engaged in anti-social behaviour or that such permission would not be in the interest of good estate management, or
- (iv) the tenant of the dwelling or the person concerned fails to provide information that is requested by the authority and which the authority considers necessary in connection with deciding whether to give, refuse or defer such permission.

Where the property is allocated on the basis of a false declaration, such as in an affidavit, Galway County Council reserves the right to withdraw or defer such an allocation. The furnishing of false or misleading information is an offence and is liable to prosecution by the housing authority and on summary conviction to a fine not exceeding €2,000.

## **7. PRE-TENANCY TRAINING/INDUCTION**

The Local Authority organises pre-tenancy induction training for all prospective tenants and it is obligatory for prospective tenants to attend. The Council aims to provide an online tenancy course during 2021 that must be completed pre-tenancy. The induction is provided with co-operation and input from other relevant Units of the Council and external organisations:

- Environment Unit, Galway County Council
- Community Warden Service, Galway County Council
- An Garda Síochána
- Department of Social Protection
- Money Advice and Budgetary Service

During this induction training, the Tenancy Agreement which is signed by the tenant(s), is explained and the consequences of breaching the terms of the agreement outlined in detail. During this training the tenant is advised of the Anti-Social Behaviour Strategy and its contents.

## **8. CLOSED CIRCUIT TELEVISION (CCTV)**

Personal information gathered by CCTV is used in accordance with the Council's CCTV policy, the Council's Data Protection Policy and General Data Protection Regulations.

The Council has invested in high definition community-based CCTV systems in various estates across the County for the purposes of the safety of the community and the prevention of damage to Council property. The installation of the CCTV is proving to be an extremely effective resource in reducing the incidence of anti-social behaviour, dumping, criminal activity, damage.

Galway County Council has obligations in relation to the protection of staff in the workplace and may use Body Worn Cameras.

## **9. ACTION PLAN**

The objectives of this Anti-Social Behaviour Strategy as outlined above will be achieved by implementing the following action plan.

Galway County Council takes complaints of anti-social behaviour seriously notwithstanding the understanding of anti-social behaviour can vary from person to person and what is acceptable to one person may be unacceptable to another. In investigating complaints an even-handed approach must be taken.

It should be noted that allegations involving criminal activity are a matter for An Garda Síochána in the first instance and should be reported to them as a matter of urgency. Whilst any investigation into such matters is ongoing by An Garda Síochána, Galway County Council may not be in a position to act until the criminal investigation has been resolved.

### **a) TENANCY SUSTAINMENT STRATEGY**

The Council's Tenancy Sustainment Strategy shows its commitment to provide secure and lasting homes. This Strategy acknowledges that some anti-social behaviour can arise as a result of complex issues which may be resolved with the provision of additional supports to vulnerable families.

### **b) TENANCY AND ESTATE MANAGEMENT UNIT**

Galway County Council housing staff including Housing Liaison Officers, Social Workers, a Tenancy Enforcement Officer, a Traveller Liaison Officer and other administrative staff are responsible for the handling of all complaints of anti-social behaviour.

### **c) MULTI-AGENCY APPROACH**

The Local Authority has extensive expertise in relation to all areas of housing provision and management. As some instances of anti-social behaviour may involve households with complex needs such as mental health issues or addiction problems additional supports and assistance may be required. The Council cannot address such issues on its own. Multi-agency contacts have been established linking Galway County Council with other stakeholders, to include but not limited to:

- **An Garda Síochána**
- **Health Service Executive**
- **TUSLA**
- **Probation Services**
- **Department of Education & Science**
- **Department of Social Protection**
- **Revenue Commissioners**
- **Western Traveller and Intercultural Development**
- **Galway Traveller Movement**
- **Irish Refugee Council**
- **COPE, SIMON and all other Approved Housing Bodies**

The Council engages and liaises with other agencies with a view to multi-agency input to resolve matters of anti-social behaviour. This multi-agency approach ensures a co-ordinated response by the agencies and increases the prospect of a successful resolution for the Council and local communities.

### **d) JOINT POLICING COMMITTEE**

Joint Policing Committees (JPCs) provide a forum where the Local Authority (local authority officers and elected members) and Senior Garda Officers policing the local area can participate with Oireachtas members and community representatives to consult, discuss and make recommendations on issues relating to policing and crime in the local area. An Garda Síochána are advised of the development of the Anti-Social Behaviour Strategy and their input assists in providing an effective approach to dealing with anti-social behaviour issues.

### **e) Design of Housing Schemes**

The Local Authority will continue to ensure that the planning for, and design of, all new council housing estates creates sustainable communities and minimizes the opportunity for anti-social behaviour. The same principles will also apply when designing remedial works and regeneration works on older schemes.

**f) Residents' Associations**

Galway County Council recognises the valuable input of local communities and the importance of empowering them to play a positive and proactive role in their locality. The Council will continue to promote greater resident involvement in the management and development of their estates.

Galway County Council actively encourages the establishment of Residents' Associations in all housing estates. It will assist residents in existing estates to form Residents' Associations and provide necessary supports.

**g) TRAVELLER ACCOMMODATION**

Galway County Council has a Traveller Liaison Officer who builds relationships with the travelling community and deals with Traveller Specific Accommodation including anti-social issues that may arise.

**h) HOMELESS UNIT**

It is acknowledged that some families may require additional supports on exiting homeless services to prevent anti-social behaviour. The Council's Homeless Unit offers intensive tenancy sustainment supports and may involve the input of external agencies.

The Housing First model is being adopted by Galway County Council which will involve a range of additional measures and supports to tackle homelessness.

## **10. DEALING WITH COMPLAINTS**

Complaints of anti-social behaviour or breach of tenancy will be accepted by:

- Telephone during office hours to 091 509304
- E-mail to [tem@galwaycoco.ie](mailto:tem@galwaycoco.ie)
- By post to Tenancy and Estate Management Unit, Housing Section, Galway County Council, Prospect Hill, Galway
- Completion and submission of Anti-Social Behaviour complaints form  
<http://www.galway.ie/en/media/Anti-social%20behaviour%20complaint%20form.pdf>
- In person to the Housing Section, Galway County Council public counter during office hours

### **RESPONSE TO COMPLAINTS**

The Council will respond to complaints received within 5 working days and an investigation will commence into complaints within 10 working days, as resources allow. The length of time required to resolve a case will depend on the actions considered necessary.

### **CONFIDENTIALITY**

Whilst Galway County Council will endeavour to ensure the confidentiality of the complainant this cannot be guaranteed in all cases.

### **CONFIDENTIALITY OF THE COMPLAINANT AND FREEDOM OF INFORMATION**

All complaints received in relation to anti-social behaviour or breaches of the tenancy agreement will be dealt with in a confidential manner, subject to the requirements of law. The Council will fully comply with the provisions of the Freedom of Information Act 2014. Section 35 of the Freedom of Information Act 2014 provides for a body to refuse to grant an FOI request in relation to information given in confidence and on the understanding that it would be treated by it as confidential.

### **DATA PROTECTION**

All investigations will be carried out in accordance with the provisions of the Data Protection Acts 1988 and 2018 and the General Data Protection Regulations.

### **INVESTIGATING THE COMPLAINT**

The Council will investigate complaints received in a fair and impartial manner. This may involve enquiries with other statutory agencies in accordance with Section 15 of the Housing (Miscellaneous Provisions) Act 1997 and/or other tenants or residents. The Council will use all available means at its disposal to investigate a complaint.

The complaint is investigated, in the first instance by the Housing Liaison Officer who will issue the first and second breaches of tenancy agreement, if deemed appropriate. If the breach is not resolved after the second breach of tenancy letter is issued, the matter will be referred to the Tenancy Enforcement Officer who will investigate the matter further. A Statutory Tenancy Warning will be issued after this further investigation if deemed appropriate.

The investigation carried out will depend on the complaint made and the circumstances involved. It may involve some or all of the following:

- Examination of the tenancy file, to include the tenancy agreement, records of previous complaints made
- Contact and meeting with the alleged perpetrator and statement taken
- Contact and meeting with the complainant and statement taken
- Visit to the dwelling and compilation of reports to include photographs

Depending on the outcome of the investigation one or more of the following actions will be taken:

### **No Further Action**

If the Estate Management Unit has reasonable grounds for believing that the complaint is unfounded or malicious then no further action will be taken against the alleged perpetrator. In the case of malicious complaints, the Estate Management Unit may forward details of the unfounded complaint and investigation to An Garda Síochána.

### **Advice Given**

Advice may be offered where both parties are in the wrong and the complaint is of a trivial nature. It may also be used if complaints involve minors under the age of criminal responsibility.

### **Referral to other Agencies**

Some cases involve families with complex welfare needs, mental health issues, addiction problems, domestic violence, with clear needs for supports and assistance. These cases may be referred to appropriate external agencies, such as An Garda Síochána, HSE, TUSLA

Some complaints are so serious that the complainant is immediately referred to An Garda Síochána and the HSE/TUSLA. This usually involves complaints in relation to drug activity or child protection issues. Galway County Council will implement their Child Protection Policy where child welfare issues come to their attention.

### **Mediation**

The Estate Management Unit has access to trained mediators who are available to assist with disputes between neighbours. Both parties must be willing to participate in the process. Galway County Council will bear the cost involved.

## **FORMAL PROCESS**

**Galway County Council reserves the right to commence at any point of this process depending on the seriousness of the issue.**

### **Verbal Warning**

A verbal warning is a means of advising a tenant that their behaviour is causing others in the community distress or fear and is interfering with their enjoyment of their property. It informs the tenant that the unacceptable behaviour should cease. It includes details of the possible consequences of the failure to comply with the warning. The Council Officer does not necessarily need to observe or witness the behaviour and can act on a complaint(s) received in writing. The verbal warning will be confirmed in writing as soon as is reasonably practicable, either delivered in person or via ordinary post.

### **First Breach of Tenancy Letter**

The issuing of a first Breach of Tenancy letter is usually reserved for more minor breaches of the tenancy agreement whereby it has been established that a breach has occurred. This letter outlines the consequences of not complying with the request to address the issues raised. It is possible that a number of such letters may issue to a tenant for various breaches. It is paramount that there is continual engagement with the Housing Liaison Officer to resolve the matter. There may be time constrained boundaries included in these letters.

### **Second Breach of Tenancy Letter**

Where the tenant fails to comply following the first Breach of Tenancy letter, a second Breach of Tenancy letter may issue. This letter will also explain the consequences of failing to comply to include the possibility of legal action. This letter will issue when Galway County Council is confident that an escalation of the breach has occurred, and Galway County Council has sufficient evidence and powers under the various acts to proceed to legal action if required. There may be time constrained boundaries included in these letters.

### **In-House Case Conference**

An in-house case conference will take place in serious cases where Breach of Tenancy Agreement letters have not resulted in the required outcome or an incident is so serious that it warrants immediate action and possible referral to external agencies by Galway County Council. The Council will request from An Garda Síochána, in writing, substantiated evidence that this serious incident did occur and enquire if any investigation is ongoing.

The in-house case conference is held as soon as is practicable and is attended by the staff of the Tenancy and Estate Management Unit, Social Work Unit, management staff in the Housing Department and staff from any other relevant Departments in the Council.

## **Inter-Agency Meeting with External Agencies**

Following an in-house case conference, it may be deemed appropriate by the Housing Unit to invite representatives of external agencies to attend an inter-agency meeting.

Each case is discussed in detail and an agreed decision on action is made which may include, but is not limited to, the following:

- No Further Action
- Await investigation by other Agencies
- Referred back to Estate Management Unit /Authorised Person for further enquiries.
- Apply for Excluding Order
- Statutory Tenancy Warning Letter

It may also be appropriate to have a case conference to include the external agencies and the tenants.

## **Excluding Order**

Galway County Council may, in respect of a house provided by the authority under the Housing Acts, apply for an Excluding Order in accordance with Section 3 of the Housing (Miscellaneous Provisions) Act 1997, as amended by Section 19 of the Housing (Miscellaneous Provisions) Act 2014, in order to deal with a person whom the Council believes is engaged with anti-social behaviour (other than the tenant), where there is no joint tenant or relevant purchaser of the house where the Council:

- (a) believes that the tenant or relevant purchaser –
  - (i) may be deterred or prevented by violence, threat or fear, either to himself or herself or to persons associated with him or her, from pursuing an application for an excluding order, or
  - (ii) does not intend, for whatever other reason, to make such an application, and
- (b) consider that, in the interest of good estate management, it is appropriate, in all the circumstances, to apply for the excluding order.

The Court may by order direct that person to leave the house and not re-enter it or be in its vicinity during the period that the order is in force, for a maximum period of 3 years.

The Council may also apply for a site excluding order.

An Garda Síochána will always be consulted during the Council's consideration of making an application for an Excluding Order.

### **Statutory Tenancy Warning Letter**

A Statutory Tenancy Warning Letter is a letter served on a tenant pursuant to Section 7 and Section 9 of Part 2, Housing (Miscellaneous Provisions) Act 2014.

- Section 7 provides that a statutory Tenancy Warning Letter be sent in circumstances of anti-social behaviour
- Section 9 for breach of the tenancy agreement.
- Failure by a tenant to adhere to the requirements set out in any such statutory Tenancy Warning Letter to immediately cease the antisocial behaviour or breach of tenancy agreement **may result in the Council initiating repossession proceedings against the tenant in the District Court.**

The Council will seek the assistance and support of An Garda Síochána in all legal cases involving anti-social behaviour.

## **11. APPEALS**

### **Appeal of Breach of Tenancy**

Tenants may appeal in writing to a Senior Executive Officer of the Housing Section where they dispute the content of any breach of tenancy agreement letter issued to them. The Senior Executive Officer will appoint an officer or employee of a local authority who was not involved in the decision to investigate and compile a report. The Senior Executive Officer will revert in writing to the tenant.

### **Tenancy Warning Review**

Pursuant to Part 2, Section 10 Housing Miscellaneous Provisions Act 2014, a tenant may request the review of a tenancy warning issued to him/her. The Chief Executive shall appoint as the reviewer of the tenancy warning concerned an officer or employee of a local authority who was not involved in the decision to issue the tenancy warning and who is senior in rank to the officer or employee who decided to issue that warning.

## **12. REQUESTS TO TRANSFER**

All transfers must take place in accordance with Galway County Council's Housing Allocations Scheme. The reference to the requests to transfer in the Anti-Social Behaviour Strategy is for information purposes only.

### **13. COUNCIL EMPLOYEES**

Galway County Councils Dignity at Work Policy acknowledges that its employees are entitled to work in an environment that is free from all forms of harassment and bullying and where everyone is treated with dignity and respect.

Galway County Council is committed, insofar as is reasonably practicable, to ensuring that all staff have a safe working environment and to promoting the well-being of employees, whilst achieving the objectives of the organisation.

Galway County Council will not tolerate any assaults, threats, intimidation, obstruction, harassment or interference of employees. This may include verbal and physical abuse and the inappropriate use of social media towards employees. Where it is deemed appropriate such incidents will be reported to An Garda Síochána for investigation. All incidents will be recorded, and the Council may issue legal proceedings against any person engaged in such activity.

Any person who commits an offence in accordance with Section 18 of the Housing (Miscellaneous Provisions) Act 1997, as amended by Section 19 of the 2014 Act, is liable on summary conviction to a class A fine, or at the discretion of the Court, to imprisonment for a term not exceeding 12 months or both.

# **APPENDICES**