



# Submission

# Anti-Social Behaviour Consultation

March 2024

[homelessconnect.org](https://homelessconnect.org)

## Homeless Connect Response to consultation on proposals to amend the legislation to help tackle Anti-Social Behaviour

### Introduction

1. Homeless Connect has been working to prevent and alleviate homelessness in Northern Ireland since 1983. As a membership body, we represent organisations working with people experiencing homelessness or at risk of becoming homeless and provide direct support to service users through our projects.<sup>1</sup>
2. We welcome the opportunity to respond to this consultation. At the outset, we recognise that this is a complex area of law which requires sensitive and careful consideration. Anti-social behaviour can lead to a wide variety of harms for those who experience it and it is important that proportionate tools are available to statutory authorities to respond to it.
3. People at risk of or experiencing homelessness can both be victims and perpetrators of anti-social behaviour. The proposals outlined in the consultation document, if implemented, are highly likely to impact on this group of people. While we note that a wide range of organisations have been involved in the development of these proposals, we would highlight that individuals from this group do not appear to have been consulted thus far. We would submit that it is imperative that the two Departments look to engage directly with people with lived experience of homelessness on these proposals to ensure that their voices are heard in this consultation process. We would be willing to play a role in facilitating such engagement if the Departments would value it.
4. To help inform our response to this consultation, we held a focus group with six individuals who have lived experience of homelessness. Several people who took part have experienced chronic homelessness with all of the impacts this can have.<sup>2</sup> Several of the insights outlined below come from comments they made during the session we held with them. We at Homeless Connect are hugely grateful to them for taking the time to engage with us on the issues raised in this consultation.
5. We would additionally submit that engaging with frontline staff in the homelessness sector on these proposals would be a highly worthwhile step. Some of these staff have rich insights to provide on issues around anti-social behaviour (especially staff working in outreach and floating support environments). We again would be willing to play in facilitating such engagement if this would be of value to the Departments.
6. At this stage in the consultation process, we retain concerns about many of the proposals set out in terms of what the impact on people at risk of or experiencing homelessness might be in practice. We believe that a fundamental weakness in the consultation documents is a failure to provide a clear and empirically based evidence base behind the proposals outlined. We will outline these concerns in what follows below.

## Drinking in Public in Northern Ireland

7. Homeless Connect recognises that it is important for public authorities to be able to regulate the consumption of alcohol in public spaces. We understand that statutory authorities have outlined to the Departments that difficulties have arisen with the current legislative and regulatory framework. However, there is a lack of detail in the consultation document as to what these precisely are. The bullet list at paragraph 3.12 fails to provide any evidence of the issues being claimed. We do not believe that we can assess the claims being made on the basis of the consultation document provided. This is not necessarily to say that legislative changes should not be brought forward but it is a real and significant challenge in terms of assessing the proposals made.
8. An observation we would make about the current legislation which is in place as well as any amended legislation brought forward in future is the importance of statutory bodies granted enforcement powers only using them as a last resort. It is well known that addiction to alcohol can be connected to traumatic experiences in a person's life.<sup>3</sup> People experiencing chronic homelessness who are addicted to alcohol may have a range of complex needs. This group of people are some of the most stigmatised people living here.
9. A significant concern we would highlight is what the impact of a blanket ban on the consumption of alcohol in designated public places may be for this group of people. If individuals experiencing chronic homelessness consume alcohol in a public place but are not engaged in any form of anti-social behaviour resulting from their alcohol consumption, it is not clear to us that the utilisation of criminal sanctions against this behaviour would have beneficial outcomes.
10. This point was strongly emphasised in our focus group with people with lived experience of homelessness. There was a recognition amongst participants that there is a need for legal powers to protect members of the public if alcohol consumption led to behaviour which could pose a risk to them. However, the group was clear that to criminalise alcohol consumption in public places in and of itself actually runs the risk of exacerbating the challenges faced by those experiencing chronic homelessness who are addicted to alcohol.
11. The key point which came across in our focus group is that it is simply not possible for society to 'arrest' its way out of this issue. Criminalising people in this position may actually have a counterproductive impact if it places barriers to people accessing the services they need or negatively impacts on employment prospects in the future. Members of our focus group had experience of the negative impact criminal records can have. Diversionary or restorative approaches may be more effective in practice when engaging with this group of people, especially if they are young people who may only recently started to engage in drinking in public places. We would particularly commend multi-disciplinary interventions involving not only criminal justice bodies but also health and voluntary and community sector partners.

12. A further point highlighted in our focus group was the fact that whatever the law is that there needs to be consistency in how it is applied. It was noted that the current legislation appears to be selectively enforced around public holidays such as St Patrick's Day and the 12<sup>th</sup> of July. While there may be operational reasons for the PSNI adopting this approach, it sends a message to people experiencing chronic homelessness around how they are perceived and valued. This selective enforcement can lead to resentment on the part of people experiencing homelessness, as they see people, including students, who are housed being treated differently.
13. The focus group we held sharply highlighted the importance of engaging with people with lived experience of homelessness. The Departments should engage directly with people who have been in this situation as well as organisations working with them to understand what the practical effects might be. We would further recommend that organisations involved in the Complex Lives initiative being led by Belfast City Council are directly consulted on the impact any legislative changes would have.
14. A final point we would raise is the risk of displacement of vulnerable individuals if the approach adopted is to single out particular areas as areas where you are not allowed to consume alcohol. Members of our focus group indicated that if such a provision had been in force that they would move to an area where they would not face the risk of police action. Great care would need to be taken over how this was done if such a measure was to be implemented.
15. If any changes are made to the law in this area, we would recommend that the impact of the change is closely monitored in recorded statistics so that any impacts arising from the new offences can be assessed.

### Anti-Social Behaviour Orders (ASBOs) in Northern Ireland

16. While we recognise the argument being put forward in this section regarding the need for reforms to be made to the legislative framework governing Anti-Social Behaviour Orders, this section is significantly impacted by the lack of an empirical evidence base to assess its veracity. It is particularly striking that no reference is made in this section to the statistics on Anti-social behaviour which are published on a quarterly basis by the PSNI.<sup>4</sup> As with our comments elsewhere in this response, this makes it challenging to assess the need for the changes being proposed. For example, at paragraph 4.10, the consultation document asserts that "partners and the relevant authorities named within the legislation (Councils, NIHE & PSNI) have highlighted limitations on the current usefulness of the ASBO ranging from its effectiveness for use in housing matters to the time and difficulty in preparing a file for court." We have no doubt that these statutory bodies have legitimate concerns but the lack of detail provided makes it impossible to assess the veracity of these claims. If changes are to be made in this area, it needs to be based on empirical evidence. Unfortunately, such evidence is not provided in the consultation document.

17. We have significant concerns about what the potential impact of some of these proposals may be on people who are at risk of or experiencing homelessness. These concerns arise from the experiences of our members and from the focus group we held with people with lived experience of homelessness. We are particularly concerned about the impact that these proposals may have on people who are experiencing chronic homelessness and on young people who are at risk of or experiencing homelessness.
18. As we have acknowledged above, people in these groups can be both perpetrators and victims of anti-social behaviour. In our focus group, a number of participants could testify to this reality from personal experience. Many of them spoke about being verbally abused by people when they were on the street; one participant mentioned the theft of personal property and the damaging impact this had; and one participant had experience of a property he was living in being subject to criminal damage. One particularly noteworthy aspect of this was the fact that participants who had been subject to anti-social behaviour did not feel that they would be able to approach the PSNI when they had been victims of crime or had experienced anti-social behaviour. This came from the perspective of a lack of trust in how the PSNI would approach concerns they raised as well as the fear of being labelled as a 'tout' for engaging with police.
19. Participants in our focus group had heard of ASBOs and had some knowledge of the debate around their utility. While none of the participants had experience of having an ASBO imposed, some participants knew individuals who had. They noted that the impact of the ASBO on these individuals was strongly negative and had a long-lasting impact in terms of stigma for them.
20. Homeless Connect acknowledges the need for measures to be in place to take action against anti-social behaviour provided they are proportionate and necessary. However, we are concerned about how the proposed changes outlined here may contribute to further stigmatisation of already vulnerable groups.
21. We note the proposed change to the definition of anti-social behaviour outlined in the consultation document. The definition put forward, which mirrors the definition set out in the Civil Injunction in England and Wales, is a potentially very wide definition. The threshold put forward- "conduct capable of causing nuisance or annoyance in relation to that persons occupation of residential premises" or "conduct capable of causing housing-related nuisance or annoyance to any person" is a low one. The consultation outlines that this will "give greater scope to relevant authorities to handle housing specific anti-social behaviour" but fails to outline what is specifically in view here.
22. We note that the statutory Home Office guidance for frontline professionals on anti-social behaviour powers indicates the following regarding the use of civil injunctions to respond to anti-social behaviour:

“The injunction can be used to deal with a wide range of behaviours, many of which can cause serious harm to victims and communities in both housing-related and non-housing related situations. This includes vandalism, public drunkenness, aggressive begging, irresponsible dog ownership, noisy or abusive behaviour towards neighbours, or bullying. Injunctions should not be used to stop reasonable, trivial or benign behaviour that has not caused, or is not likely to cause, anti-social behaviour to victims or communities, and potential applicants are encouraged to make reasonable and proportionate judgements about the appropriateness of the proposed response before making an application for an injunction.”<sup>5</sup>

It is unclear in the consultation document whether the Departments envisage the widened Anti-Social Behaviour Order to be used in a similar fashion to the civil injunction. The list outlined is not an exhaustive one but merely indicative. However, we infer that it is likely that this is what is envisaged by the Departments.

23. Consequently, we would ask whether the Departments envisage this widened definition being used against individuals sleeping rough and/or engaging in begging. As Johnsen et al helpfully note, “the deployment of force in response to rough sleeping, begging and street drinking is a sensitive issue that tends to evoke highly emotive responses.”<sup>6</sup> It is our view that the Departments would be advised to have a clear understanding of whether this more wide ranging Anti-social Behaviour Order is envisaged for use against people engaged in these activities before proceeding to legislate in this direction. It is our expectation and hope that the Departments would not envisage the reformed ASBOs being used for this purpose.
24. As the Departments will know, it remains a criminal offence in Northern Irish law to sleep rough or to beg under section 4 of the Vagrancy Act 1824 and section 3 of the Vagrancy (Ireland) Act 1847.<sup>7</sup> While it is the case that the PSNI in practice does not seek to enforce these legislative provisions against rough sleeping, a stance we welcome and commend, this is entirely reliant on the position of the PSNI at this time. The official Home Office guidance envisages the civil injunction being used against “aggressive begging.” We would ask the Departments to clarify before any legislative change is introduced (a) whether they envisage the Anti-social Behaviour Orders being used for the purposes of responding to begging or rough sleeping and (b) if so, whether clear and publicly available guidance will be published on how this would be implemented.
25. We would further highlight two important points drawn out by academics in England who have studied the impact of Community Protection Notices, a similar provision to anti-social behaviour orders, on people experiencing street homelessness through a case study approach. Firstly, they point out that “the location of people experiencing street homelessness resulted in CPW/CPN breaches being more readily identified by proactive monitoring compared to other recipients.”<sup>8</sup> People experiencing street homelessness are highly likely to be more visible and exposed due to their living situation when compared to other groups. This may lead them to be more likely to be targeted with Anti-Social Behaviour Orders which could lead to resentment and alienation on the part of those impacted.

26. Secondly, these academics point out that Community Protection Notices are asymmetrically enforced in different parts of England. They note:

“Respondents detailed very different approaches to issuing CPNs to people experiencing street homelessness. There were both police and council officers that were adamant they would not issue a CPN to this group... CPNs were a popular enforcement tool for others and begging requirements were regularly included... there were different approaches evident within a single case study area between council officers in favour of issuing to people experiencing street homelessness, compared to police officers where some were in favour and others not.”<sup>9</sup>

They go on to note that this has been allowed to occur “because of a dearth of procedural safeguards to monitor how these notices are being issued.”<sup>10</sup> If this change is introduced, this is a powerful argument for ensuring there are robust scrutiny processes in place to ensure that the individuals impacted are not subject to a postcode lottery in terms of enforcement.

27. We understand and accept the rationale behind amending the legislation to remove the ‘not of the same household’ qualifier to ‘any person’. It is possible to envisage situations where this could be unhelpful and it is reasonable in our view to extend the definition.
28. Questions around the standard of proof for the imposition of an Anti Social Behaviour Order are significant. It seems incongruous to apply different standard of proof to the imposition of such an order than to determinations of breaches of the order. Considering the significant impact that the imposition of an Anti Social Behaviour Order can have for the person who receives it (as noted above), we would question this proposal. It further runs the risk of blurring civil and criminal penalties in an unhelpful manner which may prove confusing to those who receive these orders.
29. We can see and understand the rationale behind allowing housing associations to be added to the list of ‘relevant authorities’ who have the power to make an ASBO application. We accept that there is a logic in terms of providing equality to social housing tenants regardless of the form of social housing they live in. However, we would point out that housing associations are not accountable to the public in the same way as the PSNI, District Councils and the NIHE. They are independent charities with their own boards and governance structures. This does not necessarily mean that Housing Associations should not be added to the list of ‘relevant authorities’- however, we would want to know how housing associations would be held accountable for their use of these provisions in practice. Before such a change could be made, staff at housing associations would need to be trained in the use of the provision and robust statistical reporting would be necessary.
30. In considering the introduction of positive requirements within the terms of an ASBO, we regret the lack of evidence put forward for the impact of these positive requirements in

England and Wales. This is a significant difficulty, as we believe that such empirical evidence would help in understanding what the impact of imposing such requirements might be.

31. The statutory guidance for frontline professionals in England sets out parameters on the use of positive requirements within the terms of their Criminal Behaviour Orders. Some examples of the kind of positive requirements which can be included are outlined including anger management courses, youth mentoring, substance misuse awareness and job readiness courses. The statutory guidance further outlines some parameters on the use of positive requirements.<sup>11</sup>
32. Participants in our focus group raised significant concerns about the impact that the imposition of positive requirements would be in practice. Participants were presented with a scenario where an individual was subject to an ASBO due to behaviour arising due to alcohol addiction who had a positive requirement imposed that he attend an alcohol awareness class. Participants noted that recovery from addiction to alcohol or substances is not a linear, straightforward process for many who seek to address their addictions. It can be marked by relapse and regression as well as personal growth and progression. A concern noted was that if positive requirements are imposed it may set a person up for failure if this reality is not recognised. So for example, if a positive requirement was placed on a person addicted to alcohol to attend an alcohol awareness class where they needed to be sober, this would in practice be highly likely to lead to a breach of the requirement with all of the consequences this would generate.
33. A further point noted by participants related to what would happen in a scenario where a person subject to positive requirements desisted from the behaviour which led to the ASBO being sought but failed to fulfil the positive requirements imposed. If the core focus of the ASBO was addressing the behaviour and it achieved that goal, a basic question of justice arises if a person is then subject to criminal penalties for something they did not do (i.e. attend a course) as opposed to something they did do.
34. While focus group participants did understand the perspective of both landlords and people in other properties on the imposition of positive requirements, they did not believe they overrode the concerns about the possibility of positive requirements setting up a person for failure. We would urge the Departments to give serious consideration to this issue in considering how to proceed.
35. It is our submission that if this change was to be made that the applicant would have to be ultimately responsible for ensuring the conditions of the order are complied with. It seems to us to be unreasonable to expect a provider of a course to be held responsible for this. These are often small organisations with limited resources. With that said, as part of any agreement to run the course it would be reasonable for the provider to be required to report on participation to the applicant. In terms of costs, in our view this should also be borne by either the applicant seeking the requirement or the Department of Justice.



36. We would further submit that if this legislative change is made that it is important that the use of positive requirements is monitored to ensure that they are being used proportionately and they are having the desired effect. Statistics should be collated on the use of these requirements and published by the Department of Justice.
37. We would also express caution about the use of the widened Anti-Social Behaviour Order as it impacts on young people at risk of or experiencing homelessness. It is recognised that the consultation states that the use of ASBOs “is potentially no longer the most suitable option for use against those under 18,” a position we welcome. However, young people aged 18 to 25 at risk of or experiencing homelessness may be impacted by the proposed changes. Over-zealous use of such orders may run the risk of bringing these young people in to the criminal justice system with all of the consequences this may have for them and their future prospects. We would also stress that some young people may not have the same level of understanding around the ambit and impact of such orders. Early interventions and partnership working with young people in this position are a more preferable approach which may generate more sustainable and positive outcomes.

### Injunctions Against Anti-Social Behaviour in Northern Ireland

38. We hold some concerns about the proposal to amend the threshold for the imposition of a civil injunction from proving that there is a “significant risk of harm” to the thresholds introduced in Part 1 of the Anti-social Behaviour, Crime and Policing Act 2014 for England and Wales. We understand the concern which has been raised by housing associations and by the Housing Executive about the current threshold being too high although again as with the rest of the consultation document we are concerned about the lack of a clear empirical basis for the proposal being put forward.
39. While we can see the logic behind this view, it has to be borne in mind the consequences which can flow from the imposition of an injunction. To proceed with this change would require strong empirical evidence to its necessity which is simply not provided in the consultation paper. It may be that such a proposal would be the right course to take, but simply because England and Wales have taken a particular course does not necessarily mean that it is the right course for this society. We would also value the production of any evaluation of the impact of this proposal in England and Wales in determining its impact.
40. Similar challenges arise with the proposal to attach a power of arrest (including a power of entry) to injunctions against anti-social behaviour if the court thinks that anti-social behaviour consists of or includes the use or threatened use of violence against other persons, or there is a significant risk of harm to other persons. While we can see the value behind this proposal, the consultation paper does not include the evidence on which to assess whether it is in fact necessary or any assessment of the impact of this change in England and Wales. If this change was to be made, additional evidence would need to be provided for its necessity.

41. In our focus group with people with lived experience, some participants did accept that there were limited circumstances where this power could be necessary. The use or threat of violence was one such circumstance cited. However, concern was expressed about the risk of abuse of this power by the PSNI in practice. The use of a warrant helps to mitigate this risk. Consideration should be given to procedural safeguards and scrutiny if this proposal is proceeded with.
42. We would further highlight that evidential issues arise around the proposal to amend Article 26 to allow for courts in NI to attach a power of exclusion to injunctions against anti-social behaviour in circumstances set out in paragraph 5.18 of the consultation document. While we can understand the logic of the argument being put forward, the only evidence provided to support the change is that “Social landlords in Northern Ireland feel that the facility to include exclusion powers in injunctions against anti-social behaviour could help to ensure the wellbeing and safety of tenants who have been threatened with violence.” It may be that the social landlords have a strong case to make and we can understand the logic of the proposal, but this vague and unspecific paragraph does not provide the kind of solid evidence base which would be necessary to make this change.
43. The impact that this power could have also needs to be borne in mind. If this power was to be used, it may have the effect of making an individual homeless by preventing them from returning to the place where they would normally live. While we accept there may be circumstances where this could be necessary, the seriousness of taking such a step needs to be recognised. If the person impacted by this move may have nowhere else to go, alternative support would need to be offered to the person concerned. We do not see reflection on this issue in the consultation documents.
44. Participants in our focus group echoed the assessment set out above. They agreed that there are circumstances where such a power could be necessary, but that the person subject to the injunction would need to be able to access housing support if they had nowhere else to go. Otherwise, the effect of the exclusion would be to leave a person potentially destitute with nowhere to go. Such a scenario is not to the benefit of the person impacted or to wider society.
45. In terms of the use of positive requirements with injunctions, we reiterate the points we made above around the use of such requirements.
46. If any changes to Article 26 were to be made, we would want to ensure that sufficient safeguards would be in place to allow for monitoring of the use of the powers in the proposed amended Article 26 of the Housing (NI) Order 2003 and an effective and quick appeal mechanism is available.

## Absolute Grounds for Possession in NI

47. The proposal to introduce an absolute ground for possession along the lines of the absolute ground provided in section 84A in the Housing Act 1985 has on its face a strong rationale behind it. However, like the other proposals, there is a lack of empirical evidence cited in the consultation document to support the need for the change. We note the following: “the NIHE has found that the threat of eviction is an effective tool when dealing with those very serious cases of anti-social behaviour and in practice it appears to be the greatest incentive to moderate behaviour.” We would value an opportunity to consider the evidence behind this statement and to understand what in the mind of NIHE constitutes “very serious” anti-social behaviour. It is acknowledged that the framing of this paragraph would imply that this power would only be used in rare cases as a last resort. This is sensible, in that the impact of this process being followed through may be to make a household homeless. If this change is introduced, we would recommend monitoring of the use of this power and publication of statistics on its use.

## Conclusion

48. One further concern we wish to flag in relation to this response is our concern about the fact that a full and comprehensive Equality Impact Assessment has not been completed with regard to the proposals set out in the consultation. We do not believe that the equality screening exercise conducted properly considers the impact that these proposals, if implemented, would have on several section 75 groups. It will be evident from what we have outlined above that we believe that these proposals are likely to have differential impacts on several section 75 groups. We would particularly highlight age and disability in this regard. We would urge the Departments to conduct a thorough and comprehensive Equality Impact Assessment before proceeding further in this process.

49. A final general comment we would make about all of the proposed changes outlined in the consultation document relates to the importance of (a) monitoring of the use of any new powers (b) the importance of effective training of staff in the impact of legislative changes and (c) the need for clear and effective guidance to be provided. In England and Wales, issues have been identified in all three of these areas after the passage of the Anti-social Behaviour, Crime and Policing Act 2014.<sup>12</sup> If NI chooses to make legislative changes in this area, it is important we avoid some of the pitfalls which have arisen in those jurisdictions.

## References

- <sup>1</sup> 'Homeless Connect' is a registered charity in Northern Ireland (charity number 103325)
- <sup>2</sup> The Homelessness Strategy defines Chronic Homelessness in the following way: "Chronic homelessness is a state at the most severe end of the homelessness spectrum which can affect all household types from individuals, to large family units. Those identified as chronically homeless have very pronounced and complex support needs and find it difficult to transition from homelessness and/or the cycle of homelessness... Rough sleeping is widely acknowledged as being the most visible form of chronic homelessness but those experiencing chronic homelessness extends beyond those who sleep rough. Characteristically, individuals who are experiencing chronic homelessness tend to have multiple support needs which leads to their inability to sustain a permanent tenancy, or a temporary accommodation placement, and can result in episodes of non-engagement with support services." Housing Executive, "Ending Homelessness Together, Homelessness Strategy 2022-27", March 2022, accessed 18 December 2023, <https://www.nihe.gov.uk/getattachment/73313718-aa0e-4aae-b122-6573dcab88c7/Ending-Homelessness-Together-Homelessness-Strategy-2022-27.pdf> 38.
- <sup>3</sup> See Barna Konkoly Thege et al, "Relationship between interpersonal trauma exposure and addictive behaviors: a systematic review," *BMC Psychiatry*, 17:164, 2017. "Results provide some support for a positive association between exposure to interpersonal trauma and subsequent addictive behaviors but this relationship was not consistently reported."
- <sup>4</sup> Police Service of Northern Ireland, "Anti-Social Behaviour Statistics", accessed 22 January 2024, <https://www.psn.police.uk/about-us/our-publications-and-reports/official-statistics/anti-social-behaviour-statistics>
- <sup>5</sup> Home Office, "Anti-Social Behaviour Powers: Statutory Guidelines for Frontline Professionals," March 2023, accessed 18 December 2023, [https://assets.publishing.service.gov.uk/media/6422a19b60a35e00120cae63/2023\\_Update\\_ASB\\_Statutory\\_Guidance\\_-\\_FINAL\\_1\\_.pdf](https://assets.publishing.service.gov.uk/media/6422a19b60a35e00120cae63/2023_Update_ASB_Statutory_Guidance_-_FINAL_1_.pdf) 33-4.
- <sup>6</sup> Sarah Johnsen, Beth Watts and Suzanne Fitzpatrick, "Rebalancing the rhetoric: a normative analysis of enforcement in street homelessness policy", *Urban Studies*, 58(2), 2021, 364.
- <sup>7</sup> <https://www.irishstatutebook.ie/eli/1824/act/83/enacted/en/print.html> and <https://www.irishstatutebook.ie/eli/1847/act/84/enacted/en/print.html>
- <sup>8</sup> Vicky Heap, Alex Black and Chris Devany, "Understanding how Community Protection Notices are used to manage anti-social behaviour attributed to people experiencing street homelessness," *People, Place and Policy*, 2023, 17/1, 11.
- <sup>9</sup> Heap et al, "Understanding how Community Protection Notices", 8.
- <sup>10</sup> Heap et al, "Understanding how Community Protection Notices", 9.
- <sup>11</sup> Home Office, "Anti-Social Behaviour Powers", 39-44.
- <sup>12</sup> See Vicky Heap, Alex Black and Zoe Rodgers, "Procedural justice and process-based models: understanding how practitioners utilise Community Protection Notices to regulate anti-social behaviour," *Criminology and Criminal Justice*, 2023, 1-19.



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