

City of London Corporation

City of London Police

Safer City Partnership

**City of London
Anti-Social Behaviour Policy 2024**

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1 Introduction

Anti-social behaviour (ASB) can have an overwhelming impact on its victims and, in some cases, on the wider community. Therefore legislation has given public services a range of powers to ensure that local agencies have the tools they need to respond to different forms of ASB.

Government guidance is clear in setting out the legal tests that must be met before each of the powers can be used. It emphasises “the importance of ensuring that the powers are used appropriately to provide a proportionate response to the specific behaviour that is causing harm or nuisance without impacting adversely on behaviour that is neither unlawful nor anti-social.”

This policy brings together the policies that departments and services within the City of London Corporation (City Corporation) have – with the agreement of its elected members – put in place to respond ASB. It also reflects the approach of the City of London Police and partners of the Safer City Partnership.

The approaches they set out – and their implementation – meet the expectations of legislation and guidance. This policy aims to provide clarity by bringing together the approaches of the many services that respond to the range of ASB that is experienced. It does not change or supersede the policies approved by the responsible Committees to which service areas report and agree policy.

1.1 Policy statement

The City Corporation remains committed to prevent the escalation of, and to addressing, ASB. It will act in support of, and provide support to, victims – whether they live, work or study in the Square Mile.

The City of London Corporation will use the powers available to it to ensure ASB does not remain unchecked, and to ensure that victims can easily access information about how to apply for a formal ASB Case Review and in what circumstances they can do so.

We will ensure that three key approaches are used in tackling all cases of ASB:

- Early intervention and prevention to resolve the problem as quickly as possible
- Partnership working with appropriate agencies
- Enforcement using the full range of informal and legal tools available.

1.2 Equality and diversity

The City Corporation is committed to promoting equality within the delivery of its services to ensure that everyone is treated with respect, dignity, fairness and, above all, that they are not discriminated against.

The Equality Act 2010 provides a framework to ensure that City Corporation services (and all public services) are not provided in a discriminatory manner, ensuring that there is a fair and transparent approach in place, and that the vulnerability or disproportionate impact on those who are known or suspected of having a protected characteristic is considered in the application of any power.

We will:

- Demonstrate that we have considered any vulnerability identified within the Act when deciding to proceed with legal action

- Have concluded that legal action is needed due to the effect of the ASB on either the wellbeing of the victim and/or the perpetrator
- Ensure that the proposed legal action is a proportionate response to the ASB in accordance with legislation and guidance.

2 Anti-social Behaviour

2.1 Understanding anti-social behaviour

The City's Anti-social Behaviour Policy sets out the approach of services to intervention, partnership working and enforcement.

The policy is set out in the context of the definition of ASB as described in the Anti-Social Behaviour, Crime and Policing Act 2014. That is:

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

ASB may include:

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

There may be a fine line between ASB and issues of nuisance, or disputes between neighbours over relatively minor inconveniences. There are many behaviours that can be disruptive and inconvenient, they are not always ASB. However, these issues, in some cases, if persistent, or conducted in a manner that is targeted and threatening, can become anti-social behaviour.

When determining if a reported incident or action is considered to be ASB, officers will exercise professional judgement to assess each case.

2.2 Assessing what is anti-social behaviour.

The legal definition of ASB is very broad allowing authorities to respond to emerging issues. It is not a specific list of behaviours, actions or incidents. Issues need also to be considered in conjunction with other key factors in order to make an informed and fair determination.

The key factors distinguishing antisocial behaviour are

- **its negative impacts on the community**
- **intent to disturb others, and**
- **violation of social norms and laws.**

Everyday activities and inconsideration may cause nuisance, but would only amount to ASB if the context, impact and intent of such actions suggest they substantially interfere with others' peaceful enjoyment and go beyond the tolerance levels of a reasonable person.

In making a professional judgement, City Corporation services, and the City of London Police, will consider:

- **Context** - consider the location, time of day, and other contextual factors. Behaviour that is disruptive given the context is more likely to be antisocial
- **Reaction of others** - gauge if the behaviour is alarming, distressing or threatening to others. Reactions like fear, annoyance, anger, or disruption suggest the behaviour is antisocial
- **Intent** - assess if the behaviour is deliberately intended to harass or disturb others or is reckless in that regard
- **Laws and rules** - check if the behaviour violates any explicit laws, regulations, or rules against things like noise, public intoxication, trespassing, etc
- **Persistence** - look for patterns of repeat offending: persistent behaviours that continually disturb others are more likely to be deemed antisocial conduct
- **Harm** - evaluate if the behaviour causes tangible harm like damage, injury or costs. Harmful conduct is a sign of antisocial actions
- **Mitigating circumstances** - consider any mitigating conditions like youth, disabilities, or incapacitation that could make a behaviour less deliberately antisocial.

By weighing these kinds of factors, the teams and agencies can assess whether a behaviour crosses the line into being anti-social in nature.

2.3 Severity of ASB and risk assessments

Reports of personal ASB are assessed as being low, medium or high risk

- where ASB involves the use or threat of violence or there is a significant risk of harm (for example, a hate crime/incident), an officer will aim to contact the complainant within one working day
- for other reports of ASB, an officer will aim to contact the complainant within five working days
- if a victim's risk assessment score is high, then the Corporation officer will consider whether a referral should be made to an appropriate agency.

For reports of noise pollution, the Public Protection Team has its own attendance standards which can be found on the City of London website: [Disturbed by noise in the Square Mile? - City of London](#).

2.4 Categorising and prioritising reports of anti-social behaviour

While risk can be a subjective judgement, officers will look for key indicators to help them understand the potential severity of risk:

- behaviour consists of threats of violence, actual violence, or if there is a genuine risk of harm
- the behaviour is directed at the complainant: in some cases, the complainant may be experiencing ASB which is not directed at them specifically (for example, someone playing music and disturbing a neighbour). If the behaviour is targeted at the complainant (for example, physical abuse), then this is a higher risk. This risk is further escalated if the incident is motivated by hate for a protected characteristic.
- frequency of incidents: if they are more frequent, then the harm caused is likely to be higher.

- proximity of the perpetrator – if the perpetrator is in close, regular proximity to the complainant, then the opportunity to encounter each other is high and therefore so is the risk of further incident and harm
- additional vulnerabilities of the victim such as mental or physical ill-health, or homelessness
- whether the victim has previously been a victim of ASB or crime
- whether the victim has support networks such as friends or family.

2.5 What is not ASB

There are also many normal, innocent activities that should not be deemed antisocial, such as children playing during the day.

Some behaviour, even though it may cause nuisance to individuals, will usually not be regarded as ASB, but this will be assessed on an individual basis by either the City Corporation or City Police officers. For example, this can include:

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

Some of these issues will require a response, but not be deemed ASB. For example, one-off parties that are excessively noisy can lead to interventions that either seek a solution or result in enforcement action. In a one-off case, such action would be a response to “noise nuisance” rather than formally considered as ASB, and subject to the powers to address [Noise Nuisance](#).

3 Reporting Crime or Anti-Social Behaviour in the City of London

Please see Appendix 1 for details and links for reporting crime and ASB in the City of London. Appendix 2 maps out the relevant services of the City Corporation.

4 Responding to anti-social behaviour

4.1 Principles of addressing anti-social behaviour

The Anti-social Behaviour Policy is founded on five principles developed by the Home Office Anti-social Behaviour Strategic Board.

- victims should be encouraged to report ASB and expect to be taken seriously
- clear and transparent processes to ensure that victims can report ASB concerns
- partnership working identifies, assesses, and tackles ASB and its underlying causes
- community and stakeholder concerns in relation to ASB will be considered within the strategic needs assessments for community safety and will deliver a holistic, intelligence based approach
- adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it.

4.2 Our approach

The City Corporation, City Police and other agencies will work in partnership to identify, assess, and tackle ASB and its underlying causes. In doing so the City Corporation, City Police and partners aim to:

- encourage victims to report ASB
- take any necessary early intervention to protect people and property
- take it into account (and adjust our approach as necessary) when a victim or a perpetrator is a vulnerable person.

We will have clear and transparent processes to ensure that victims can report ASB concerns. We will:

- treat all reports as confidential, sharing information only within data protection laws and information-sharing agreements
- ensure that all ASB incidents reported that involve criminal behaviour are reported to the police
- quickly refer cases between the different departments of the Corporation, the police, and other agencies as necessary
- signpost to the Corporation's complaints process and the ASB Case Review process (formally known as the Community Trigger) where there is concern with any agency response to an ASB issue.

The City Corporation and the City Police will use the powers available to it appropriately and proportionately, recognising the potential harm that inappropriate use can have on individuals and communities.

Adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it. To support this we will:

- use any of the tools and powers available to us under the law and Corporation policy, including those tools and powers that do not require court action
- support the police in the use of Community Resolution, for incidents of ASB at the lower level of harm or risk
- facilitate an apology from the perpetrator to the victim, in a manner that the victim supports
- ensure any restitution is forthcoming in a timely fashion.

5 Taking action

Enforcement action should follow a stepped approach, exhausting non-legal remedies before deciding on legal action. However, there may be occasions that the behaviour is so serious that it precludes non-legal action and warrants immediate legal sanction.

5.1 Informal action

If the behaviour is assessed as being at a low or medium level and the victim risk assessment concurs, non-legal enforcement may be appropriate. These include:

- **Warning letters** – a formal letter from the Corporation outlining the complaint and a record of which will be held on file, should the behaviour reoccur.

- **Community remedy** – when a criminal offence or ASB incident has been admitted, the police can instruct the perpetrator to undertake an act to compensate the victim, in lieu of court proceedings.
- **Acceptable Behaviour Contracts** – a voluntary written agreement between persons who have been involved with ASB.

5.2 Legal enforcement

Legislation provides a wide range of tools and powers to tackle ASB in its various forms – such as housing legislation that enables possession proceedings in some ASB cases. Many general relevant powers are set out in the [Anti-social Behaviour, Crime and Policing Act 2014](#) and include:

- **Community Protection Notice** – to stop a person aged 16 or over, a business or organisation committing ASB that spoils the community's quality of life.
- **Civil Injunction** – to quickly stop or prevent individuals engaging in ASB, nipping problems in the bud before they escalate.
- **Without notice (ex-parte) Injunctions** – as above, but the perpetrator is not made aware of the application. Without notice, injunctions are likely to be used where violence has been used or threatened or is likely to happen.
- **Criminal Behaviour Order** – issued by a criminal court against a person who has been convicted of an offence, designed to tackle the most persistently anti-social individuals who are also engaged in criminal activity.
- **Closure Power** – to allow the Police or the Corporation to close premises quickly which are being used, or likely to be used, to commit nuisance or disorder.
- **Public Spaces Protection Order** – designed to stop individuals or groups from committing ASB in a public space.

5.3 ASB Case Review (formerly the Community Trigger)

The Anti-Social Behaviour, Crime and Policing Act 2014 introduced specific measures designed to give victims and communities a say in the way that ASB complaints are dealt with. This includes the Anti-Social Behaviour Case Review, (formerly known as the Community Trigger), which gives victims of persistent ASB reported to any of the main responsible agencies (such as the local authority, police, and housing providers) the right to request a multi-agency case review where a local threshold is met.

The City of London Corporation has a duty to carry out an Anti-Social Behaviour Case Review on request when a case meets the threshold. The threshold is met when:

- At least three separate qualifying complaints of ASB or hate incidents must have been made within the past six months
- No action has been taken
- The case has been closed and the original problem persists.

Applications for an Anti-Social Behaviour Case Review may either come directly from the victims of ASB or from a third party (with the victim's written consent), such as a family member, friend, or local elected representative (a councillor or MP). The victim may be an individual, a business or a community group.

5.4 No action

In certain circumstances e.g. where the detrimental impact is small and falls short of the definition or risk issues set out above, we may take no further action, or action that the complainant does not consider to be adequate. We will explain the reasoning behind our decisions to ensure that complainants and perpetrators understand them clearly.

6 Partnership working

We recognise that working in partnership with other agencies is key to dealing effectively with issues of ASB. We will participate in initiatives designed to improve information exchange and better joint working, with the aim of improving responses to anti-social behaviour.

Reports of ASB may be discussed at a multi-agency forum to ensure that a coordinated response is taken, involving the relevant partners to resolve the ASB problem. Such forums may include the:

- City of London Corporation City Community Multi-Agency Risk Assessment Conference
- ASB in the Night-Time Economy Group
- Homelessness and Rough Sleeping Task and Action Group
- ASB Case Review (in relation to relevant request).

6.1 City Community Multi-Agency Risk Assessment Conference

The City of London Corporation Community Multi-Agency Risk Assessment Conference is a multi-agency panel meeting where representatives from the statutory and voluntary sectors share information on vulnerable ASB victims, ASB perpetrators and ASB hotspot locations.

Partner representatives discuss options for increasing the safety of the victim, perpetrator, or location and turn these into a co-ordinated action plan. The aim is to identify the highest risk, most complex cases and solve the issues of concern. Victims also include those experiencing hate crime.

The focus is on managing the risk to the vulnerable victim and/or perpetrator and providing options for increased safety. The panel will decide on the best approach to managing the overall risk to the victim, perpetrator, or community and on effective safety planning strategies.

6.2 ASB in the Night-Time Economy Group

ASB in the City's night-time economy is discussed at a weekly meeting of partners. It considers issues including crime relating to licensed premises or by perpetrators who have visited licensed premises, ASB, noise issues and any other emerging trends. As the remit of the meeting is broad, representatives attend from the City of London Police, the City Police Licensing Team, the City Corporation Licensing Team, Port Health & Public Protection and the Community Safety Team.

6.3 Homelessness and Rough Sleeping Task and Action Group

The Homelessness and Rough Sleeping Task and Action Group is a multi-agency meeting led by the Homelessness and Rough Sleeping team to support the most vulnerable people whose rough sleeping is long-term. The aim of the group is for professionals to support the work undertaken by the City of London commissioned Outreach team in sourcing collaborative, innovative and integrated solutions to individual rough sleepers who present with complex and difficult needs.

Through effective partnership working, the group aims to resolve areas of support that compound the individual's current homelessness. Some of those who are homeless on the City's streets can be the victims or perpetrators of ASB. The Group provides a multi-agency forum to plan an approach appropriate to the context and vulnerabilities of individual circumstances.

7 Teams responding to ASB

The City of London Police are the Corporation's first responders and are responsible for dealing with ASB reports that fall outside of the remit of the City of London Corporation. This will include public disorder, crime, and nuisance behaviour.

Incidents where there is an immediate risk of harm to person or property must be reported to the police or other appropriate emergency service. Incidents of a criminal nature must be reported to the police, for example, drug dealing. The police are the lead response and investigatory service for criminal offences. The City Corporation will work closely with the police and will consider criminal behaviours when investigating an anti-social behaviour case.

Within the City Corporation services including the Housing Service, Public Protection, City Operations, and Community and Children's Services respond to ASB. The Community Safety Team provides professional support to services where enforcement action may be necessary.

7.1 Housing

Social landlords are responsible for managing ASB on their estates.

The City Corporation's has a separate [Housing Services Anti-social Behaviour Policy](#) in relation to ASB affecting its residents, or which relates to, or affects, its ability to manage its estates and related premises. Anti-social behaviour is prohibited by the City's tenancies, leases and licences. The policy describes how housing management staff will deal with breaches of these agreements by residents and others who commit acts of anti-social behaviour

The Housing Service will investigate and respond to:

- ASB incidents (including environmental ASB) that occur in the City Corporation's Housing Revenue Account (HRA) housing estates, the City of London and Gresham Alms houses, and commercial properties managed as part of HRA estates
- ASB that affects residents and their households or visitors, commercial tenants, City of London Corporation staff, agents, and contractors
- Disputes between the City Corporation's Housing tenants.

Estates managed by other social landlords will be subject to the policies and action of that landlord.

The Barbican Estate office is responsible for the residential management of the Barbican Estate.

7.2 Port Health and Public Protection

The responsibilities of the City Corporation's Port Health and Protection team include regulatory activity in relation to licensing, trading standards, street cleansing and noise. Where issues they investigate amount to ASB, they may serve Community Protection Warnings and notices or any power utilised as specified by the Antisocial Behaviour Crime

and Policing Act 2014. Their approach is set out in the [Port Health and Public Protection Policy Statement on Enforcement](#). It includes:

- Protecting consumers and working with businesses to bring them into compliance with licensing legislation
- Enforcing all noise and nuisance legislation (there is a service level agreement with the Street Environment Team to provide an out-of-hours noise response)
- Ensuring that all licensed premises comply with legislative provisions and promote the licensing objectives for the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm
- The enforcement of illegal street trading and buskers.

7.3 Pollution Control Team

The Pollution control team will respond to and investigate most complaints of noise or requests for advice including those related to construction sites, street works, bars and clubs, building plant, air conditioning, servicing of commercial premises, audible intruder and vehicle alarms.

Details of the team's response to noise – and how noise complaints can be made - can be found [here](#).

7.4 City Operations

The City Operations division provides a range of relevant activity to support the prevention and response to ASB, including:

- enforcement relating to littering, fly tipping, graffiti, flyposting, and other types of environmental ASB
- cleansing of ASB sites
- parking enforcement
- highway licensing.

Reports can be made to the City Corporation's Switchboard (020 7606 3030) or via the Online Service Enquiry form [Online Service Enquiry Form - Online Enquiry - My City \(cityoflondon.gov.uk\)](#).

7.5 Community Safety Team

The Community Safety Team responds to referrals from the City Police, other City Corporation departments and external agencies working in the City to provide specialist advice, guidance and support with enforcement in relation to ASB.

It co-ordinates multi-agency responses to ASB, where responsibility for investigation needs a collaborative approach.

Examples of cases that the Community Safety Team will oversee are:

- ASB incidents that pose a risk to individuals or the community
- ASB that is taking place in any public place or place to which the public have access that poses a risk to individuals or the community.

7.6 City of London Police

The City police specialises in ASB involving criminal behaviour and can be reported to the Police [online](#) or by calling 101 for non-emergencies, or 999 in an emergency. The 999 number should only be used when:

- it is an emergency
- a crime is in progress
- someone suspected of a crime is nearby
- there is danger to life
- violence is being used or threatened.

The City police can receive complaints relating to all types of ASB, and where they are more relevant to another service or team will refer them onward.

ASB can also be reported to Crimestoppers on 0800 555 111. Those making reports can choose to remain anonymous. This will be taken into consideration by officers when undertaking an investigation.

8 Publicity and data control

The City of London Corporation Communications Team will, wherever appropriate, liaise with Police press offices to publicise its work, to promote positive case outcomes and reassure residents of its ability to tackle and prevent ASB.

8.1 Information sharing and confidentiality

Information sharing should not be seen as a barrier to successful action. In cases where informed consent is not given (i.e., a request for information is made without the subject's knowledge or consent), for the prevention of crime and disorder or to protect vulnerable people, lack of consent should not be seen as a barrier to action.

The City of London Corporation will treat all information received with the strictest of confidence. At times it is imperative to understand that, in certain circumstances, we may have a legal obligation to share relevant information with other statutory agencies, especially where there is a need for the prevention and detection of crime or safeguarding concerns.

We have a duty to share information with partnership agencies as defined in the Crime and Disorder Act 1998 and in accordance with the Data Protection Act 1998 and data-sharing protocols.

8.2 Crime and Disorder Act 1998

Section 115 of the Crime and Disorder Act 1998 allows for the exchange of information where the disclosure is necessary or expedient for the purposes of any provision of the Crime and Disorder Act 1998, or amendments to that legislation.

The information, whether from a private individual or a member of a public body, can be disclosed to a relevant authority or a person acting on behalf of such an authority.

Under the Act, the City of London has the Community Safety Partnership information-sharing protocol.

8.3 Data Protection Act 2018

The non-disclosure provision of the Data Protection Act 2018 does not apply where a disclosure is for the purposes of (section 29):

- the prevention and detection of crime, or
- the apprehension or prosecution of offenders,
- where failure to disclose would be likely to prejudice those objectives in a particular case.

To satisfy these terms, any request for personal information, where the purpose is the prevention or detection of crime, should specify as clearly as possible how failure to disclose would prejudice this objective.

For example, if a social landlord wanted information from the police to assist them in civil proceedings, their request should make it clear why the proceedings are necessary and how a successful action could prevent crime.

8.4 Human Rights Act 1998

Article 8(1) of the Human Rights Act 1998 states that everyone has the right to respect for his private and family life, his home, and his correspondence. This right is not absolute – interference can be justified in the interests of the prevention of disorder or crime.

9 Monitoring the service

9.1 Case supervision

Every agency in the City with responsibility to investigate ASB has its own service standards and procedures. However, the manager or nominated officer will conduct reviews of cases and will consider that:

- service standards have been/are being adhered to
- all actions arising during the case investigation are accurately recorded
- all avenues of investigation have been explored, with all witnesses contacted and any problem-solving opportunities considered
- all documents, letters, statements, and evidence have been scanned and attached to the case, and all hard copy documents retained for the potential of future legal action
- all guidance and direction previously provided to the investigating officer has been actioned and cases are progressing in accordance with any planned timescales.

9.2 Complaints

The City of London Corporation is committed to always providing the best possible service, but sometimes mistakes are made. If this happens, we want customers to contact us and let us know.

Where complaints cannot be resolved by local managers and exhaust the Corporation's complaints procedure, complainants will be referred to either the Local Government Ombudsman, depending on the case issues and the complainant's tenure.

If an individual or organisation has a complaint, compliment, or comment about the City of London Corporation, they can talk to the member of staff concerned or the relevant team manager. Contact details will be provided for all teams.

9.3 Performance monitoring

The performance of this policy will be monitored by the ASB Strategic Delivery Group, that sits under the Safer City Partnership.

The group will ensure that all collated performance data is purposeful and adds value to the work of the organisation insofar as it ensures that senior managers and key partners are fully informed of ASB performance and can be used to influence procedural improvements.

Data relating to enquiries and cases logged within the City of London Corporation Community Safety Team's case management systems will be extracted through tailored reports for performance measurement, management purposes and corporate monitoring.

9.4 ASB policy review

This document will be reviewed on an annual basis, as a minimum, to ensure that it remains relevant and up to date.

Appendix 1: Reporting Crime or Anti-Social Behaviour in the City of London

Reporting ASB to the City of London Police

- Emergency – 999
- Non-emergency – 101
- Online [Home | City of London Police](#)

Reporting ASB to the City of London Corporation

- Switchboard – 020 7606 3030
- Online Service Enquiry form [Online Service Enquiry Form - Online Enquiry - My City \(cityoflondon.gov.uk\)](#)

Specific issues

Drug dealing

The dealing of drugs is a serious criminal offence and needs to be reported to the Police in the first instance.

ASB: City of London Corporation tenants and leaseholders

If ASB is happening on a Square Mile estate or block, please report this to the City of London Police and the City Corporation's [Golden Lane](#), [Middlesex Street](#) or [Barbican Estate](#) Office Teams.

If you are a City Corporation tenant or leaseholder and live outside the City of London, please contact [your estates team](#) and the Metropolitan Police Service

ASB: Guinness Partnership tenants and leaseholders

If the ASB you wish to report is not one that requires an immediate call to the City of London Police and concerns an issue where you live, please report this directly to [Guinness Partnership\(external link\)](#).

Noise nuisance

You can report incidents of noise via the City Corporation's [noise pollution](#) page.

If you are in the Square Mile and being disturbed by noise **now** call 020 7606 3030. This is a 24-hour service available every day of the year.

Fly tipping and graffiti

You can report dumped rubbish, fly tipping and graffiti using this [Fault Reporting Form\(external link\)](#).

Encampments and rough sleeping

Please note that rough sleeping alone is not considered ASB. Visit the City Corporation's [rough sleeping](#) page to get more information on how to support a person who is homeless. If you are concerned about a rough sleeper, or sleeping rough yourself, you can report this online using the [Streetlink\(external link\)](#) website

Encampments are tents or temporary shelters put up by individuals and/or groups – and are often associated with rough sleeping. If this causes nuisance, alarm and/or distress to other people it can be regarded as ASB.

Appendix 2: Service map

