

## **Anti-social Behaviour Legislation in Northern Ireland**

**Consultation Exercise to consider the current criminal legislation  
framework to tackle anti-social behaviour (including on-street  
drinking)**

### **SUMMARY OF RESPONSES**

**18 December 2019**

## **Contents**

<b>1. INTRODUCTION.....</b>	<b>3-4</b>
<b>2. SUMMARY OF RESPONSES.....</b>	<b>5-7</b>
<b>3. RESPONSES TO SPECIFIC QUESTIONS.....</b>	<b>8-16</b>
<b>4. ADDITIONAL COMMENTS.....</b>	<b>17</b>
<b>5. CONCLUSION AND WAY FORWARD.....</b>	<b>18-20</b>
<b>ANNEX A – LIST OF RESPONDANTS .....</b>	<b>21</b>

## **1. INTRODUCTION**

1.1 This document provides a summary of responses to the public consultation exercise carried out between 17 April 2018 and 24 July 2018. The purpose of the consultation was to help considerations regarding the effectiveness of current legislation to manage anti-social behaviour (ASB) – “behaviour which has caused or was likely to cause harassment, alarm or distress to one or more persons not of the same household as himself”. The consultation had a particular emphasis on nuisance and inconsiderate behaviours linked to the consumption of alcohol in public spaces, or during public celebrations, and the consideration of legislative powers to address this issue.

1.2 The consultation outlined the practical challenges which had been encountered around the commencement of sections 68 to 72 of the Criminal Justice (NI) Order 2008 (relating to confiscation of alcohol, which was intended to replace current Council bye-laws on public drinking) and provided an opportunity to seek wider views on the content of these powers, as currently drafted, and their deliverability.

1.3 The consultation sought initial views on the following powers, which have been commenced in England and Wales under the Anti-social Behaviour, Crime and Policing Act 2014, to make legislative provision for greater local involvement in tackling ASB:

- Criminal Behaviour Orders (CBOs) (which replaced Anti-social Behaviour Orders on conviction);
- Public Spaces Protection Orders (PSPOs) (which allow local authorities to deal with nuisance or problem behaviour in a particular area that is detrimental to the community’s quality of life, by imposing conditions on the use of that area); and
- Closure Powers (relating to licenced and non-licensed premises).

1.4 The consultation also sought initial views on Section 54 of the Civic Government (Scotland) Act 1982 (which provides noise nuisance powers to seize sound producing devices). In addition, respondents were given the opportunity to

provide opinions on the current legislative framework to help tackle ASB in Northern Ireland and to provide suggestion for improvements.

1.5 To encourage responses from a wide cross section of respondents, provision was made for the consultation document to be made available in alternative formats. Following a request, a child/youth-friendly version of the document was produced in May 2018. There were no requests for the documentation to be provided in a language other than English.

1.6 The launch of the consultation exercise received widespread media coverage, and all those on the Department of Justice's (DoJ's) 'section 75' list and key stakeholders received direct notification of the consultation.

1.7 50 response questionnaires were submitted for consideration and a summary of the key views identified can be accessed in Section 2 of this report. Copies of this report will be placed on the DoJ website. This document can also be made available in alternative formats, on request. Contact details are as follows:

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## 2. SUMMARY OF RESPONSES

2.1 The DoJ received a total of 50 written responses from a range of organisations and individuals. As part of this consultation exercise, DoJ officials also met with Policing and Community Safety Partnership (PCSP) managers, Belfast City Council councillors and District PCSP members, Probation Board for Northern Ireland, Northern Ireland Housing Associations Federation, Department for Communities, Northern Ireland Housing Executive, Hospitality Ulster and the Youth Justice Agency.

2.2 The Department would like to thank all respondents for taking the time to provide comprehensive responses to questions posed in the consultation document. We would also like to thank those groups who invited officials to provide further information to inform their responses. The table below summarises the respondent type and percentage of the overall total:

Respondent Type	Number	%
Central & Local Government plus Arm's Length Bodies	10	20
PCSPs	9	18
Community / Voluntary Sector	7	14
General Public	6	12
Social Housing Bodies	4	8
Youth Sector	4	8
Political Parties	3	6
Universities / Student Reps	3	6
Hospitality Sector	2	4
Environment / Rural Community	2	4
Total	50	100

2.3 Due to the range of responses received, this summary does not reflect each and every view on all of the topics but highlights the key issues with regard to each question and area considered. It should be noted that some of the issues raised

may relate to more than one question/area, therefore in order to ensure that we accurately reflect the issues raised, there may be some duplication in the content.

2.4 Overall, there was a general consensus from respondents that there were inadequacies in the current legislative framework to manage ASB. This view was based on a perception by some that the process for addressing this behaviour was ineffective and laborious. Suggested solutions included clarity on the definition of ASB; strengthening of council bye laws; a more consistent approach to implementation of existing powers and a greater focus on collaborative working to address the underlying factors for this behaviour.

2.5 Respondents indicated broad support<sup>1</sup> for powers in Part 5 of the Criminal Justice (NI) Order 2008, sections 68 to 72, to be commenced (relating to consumption and confiscation of alcohol in public spaces) as currently drafted, or with adjustments to ensure they could be implemented at an operational level.

2.6 Broadly speaking respondents were also supportive of further consideration of additional powers to help address noise nuisance, and powers to close premises associated with disorder or nuisance. There was a recognition that legislative provisions were already available in Northern Ireland to tackle these issues, and further consideration of these powers would have to be taken within the context of the existing legislative framework.

2.7 Opinions on the introduction of Criminal Behaviour Orders and Public Space Protection Orders were more divided with no overall consensus on the way forward. It was particularly evident that additional information on the use of these powers in other jurisdictions would be required to help inform considerations as to whether they could be effective in a Northern Ireland context.

2.8 Other issues raised in the consultation responses included the lack of a clear definition of what constitutes ASB and the difficulties which had been created by the blurring of civil and criminal law; role of ASB Forums; why the consultation had

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sought views on Criminal Behaviour Orders (which replaced Anti-social Behaviour Orders on conviction in England and Wales) but had not sought views on Crime Prevention Injunctions which replaced Anti-social Behaviour Orders on application; and consideration of other powers introduced in the Anti-Social Behaviour, Crime and Policing Act 2014, including the introduction of a community trigger power (allowing members of the public to request a review of actions taken to address ASB), dispersal powers and absolute ground for possession of houses or dwellings.

### **3. RESPONSES TO SPECIFIC QUESTIONS**

#### **Question 1: What are your views on the current legislative framework to help tackle anti-social behaviour in Northern Ireland?**

##### **Response**

3.1 44 (88%) respondents expressed views on whether Northern Ireland's current powers to tackle ASB work. The majority of respondents thought current measures do not work. Opinions to support this view varied. Members of the public generally thought powers to address this issue were inadequate. Their views appeared to have been influenced by personal experiences of ongoing ASB in their local area, arising from large groups of people engaging in on-street drinking. They viewed the process for addressing this behaviour as ineffective and laborious, and suggested that processes for tackling this type of behaviour needed to be streamlined, with powers being easier to understand and enforce.

3.2 Policing and Community Safety Partnerships (PCSPs) also thought powers to address ASB were inadequate. They generally referred to the ineffectiveness of anti-social behaviour orders (ASBOs) and Council powers to control nuisance behaviours. Suggestions for improvements to the current legislative framework, or the current approach to dealing with ASB, included existing council bye laws to be strengthened and a more consistent approach to implementation of powers within existing legislative provisions. They also encouraged the development of partnership approaches to deal with negative behaviours relating to drug consumption.

3.3 Responses from central and local government advocated the benefits of a wider partnership approach to resolving localised issues of ASB; supporting greater use of early intervention measures and a restorative approach to help address the underlying reasons for problematic behaviours.

3.4 The housing sector also endorsed a partnership approach at strategic and local level to address ASB, citing the specific requirement for improvements in information sharing to improve responses to this issue. They suggested 'tenancy management'



as being a more effective approach rather than more costly options such as evictions or ASBOs. They also expressed an interest in a wider debate on the use of civil injunctions to deal with some instances of ASB.

3.5 Responses from the youth sector, and their representatives, also outlined concerns about ASBOs on the basis that they are ineffective in addressing ASB, and had the potential to bring young people into the justice system for non-criminal behaviour. They highlighted their view that younger people generally had limited understanding of the range of powers to address ASB and the potential long-term consequences for individuals subject to orders such as ASBOs.

3.6 Community representative bodies and groups wanted to see more rapid interventions to tackle ASB. They did not see powers such as ASBOs as being an effective or quick response to neighbour nuisance, and echoed views from the youth sector regarding the potential impact on individuals who are in receipt of these Orders. While they recognised the need for a legislative framework to address ASB, they also endorsed an early intervention/diversionary approach on the basis that ASB was a symptom of wider societal issues and that a 'social problem requires a social response'.

3.7 Political parties also raised the issues of operational effectiveness of current ASB legislation. They cited the persistent problems in some areas with issues such as on-street drinking, without any long term resolution for residents, as an example of how the current legislative framework is lacking.

3.8 The university sector endorsed views expressed by others in terms of current measures being ineffective, particularly in areas of high population density and residential areas where there was persistent ASB. Student representatives outlined the need for a proportionate response to any future legislation developments.

3.9 Responses from the environmental sector advocated a more holistic approach to the management of ASB in open spaces, involving local management in the development and care of open spaces to deter ASB and criminality.

## **Question 2: What are your views on Part 5 of the Criminal Justice (NI) Order 2008, sections 68 to 72 and whether they ought to be commenced in Northern Ireland?**

### **Response**

3.10 33 (66%) respondents expressed views on whether Part 5 of the Criminal Justice (NI) Order 2008, s.68 to 72 should be commenced.

3.11 Of those, 22 (66%) respondents supported the commencement of these powers to deal with issues related to on-street drinking. This support came from a cross section of respondents including members of the public, PCSPs, councils, the Northern Ireland Local Government Association (NILGA), political parties, Northern Ireland Federation of Housing Associations (NIFHA), the Holyland Regeneration Association and Queen's University Belfast. Respondents caveated their support for the commencement of these powers by suggesting support on the basis of adjustments to how the legislation is currently drafted. Suggestions included asking for the legislation to include powers to 'seize' rather than 'ask' for alcohol containers; the Northern Ireland Local Government Association (NILGA) suggesting extending powers as drafted to council enforcement officers; the Law Society stating that addressing and resolving the challenges around practical implementation of this legislation would need to be addressed and resolved or the commencement of these powers would be inappropriate.

3.12 3 (9%) respondents expressed concerns that the process for designating areas could be protracted and could quickly become outdated and may displace the issue to other areas.

3.13 The key view cited by 8 (24%) respondents for not commencing these powers was that they would be ineffective in addressing this issue. This view was reflected in responses from the Law Society, the Landlords Association Northern Ireland, Community Restorative Justice Ireland/Colin Community Safety Forum and the National Students Union/Union of Students Ireland, who highlighted the ongoing challenges around the practical implementation of these powers, including interpretations of the powers to seize alcohol and re-designation of alcohol zones. They also suggested that these powers would not address the underlying reasons

for on-street drinking, and suggested that diversionary and restorative approaches are more effective at tackling this behaviour rather than punitive approaches without support.

3.14 Respondents also highlighted concerns that a legislative approach could criminalise people with alcohol addictions, as there was no discretion built in for the most vulnerable in society. Concerns were also expressed on the potential to displace this issue by the zoning of selected 'no alcohol' areas.

### **Question 3: What are your views on Criminal Behaviour Orders?**

### **Question 4: What would your views be if Criminal Behaviour Orders were introduced to Northern Ireland?**

#### **Response**

3.15 41 (82%) of the 50 respondents expressed views on Criminal Behaviour Orders (CBOs). There was no overall consensus on the potential effectiveness of these Orders, or on whether they should be introduced in Northern Ireland.

3.16 20 (49%) respondents who supported the introduction of CBOs did so on the basis that they thought they may be more effective than ASBOs. They based this view on their belief that ASBOs were ineffective; the primary reason cited to support this view was the limited usage of ASBOs in Northern Ireland. They saw the inclusion of 'positive' requirements in a Criminal Behaviour Order as a useful measure, if used proportionately, to help to change the underlying causes of this behaviour and as a tool to rehabilitate offenders. Support for these measures came from a range of respondents including members of the public, PCSPs, councils and the Public Prosecution Service.

3.17 9 (22%) respondents, including PCSPs, the Law Society and political representatives noted their requirement for additional information to inform the reservations they had regarding the operation and potential effectiveness of these orders. Their concerns included ensuring that these powers were not a duplication of other disposal methods already available; how and if they would be used; and clarity

on the mechanisms and funding for delivery of interventions. They also expressed significant concern about the potential use of these Orders on under-18s.

3.18 12 (29%) respondents, including the NIACRO, the Northern Ireland Youth Forum and the Northern Ireland Commissioner for Children and Young People (NICCY) expressed objections to the introduction of these powers to Northern Ireland, and echoed the views detailed above regarding effectiveness, proportionality of use, and use against under-18s. They raised additional concerns that the process for obtaining an Order would be as bureaucratic and protracted as they perceived ASBOs on conviction, which they had replaced, to be and questioned whether non-compliance with the 'positive provisions' in these Orders could lead to a punishable breach. They also highlighted a range of options currently available in Northern Ireland to help effect positive behavioural changes including Community Resolution Notices, Probation Orders and Youth Conference Orders and questioned the merits or need for this Order.

**Question 5: What are your views on Public Space Protection Orders?**

**Question 6: What would your views be if Public Space Protection Orders were introduced in Northern Ireland?**

**Response**

3.19 41 of the 50 (82%) respondents expressed views on whether Public Space Protection Orders (PSPOs) should be introduced in Northern Ireland.

3.20 19 (46%) respondents indicated support for the introduction of these powers to Northern Ireland. Support for this proposal came from a range of respondents including councils and the Northern Ireland Federation of Housing Associations (NIFHA). Their support was based on the view that PSPOs may be a positive response to the management of open spaces, particularly in managing groups of people, and could help in addressing the ASB issues which local communities face. However, this support was caveated on the basis that stringent safeguarding measures would have to be in place to ensure that PSPOs were used in a measured and appropriate manner. There was no consensus from these respondents on which relevant authorities should have this power.

3.21 7 (17%) respondents, including the Northern Ireland Policing Board, expressed reservations regarding these powers. They were concerned that PSPOs may lead to displacement of the problem they were intended to address, and be detrimental to young people and the most vulnerable in our communities (e.g. homeless people). They thought there should be statutory guarantees to safeguard 'community life' and to ensure consistency of approach, transparency and proportionality. They also express a concern that these Orders could also lead to criminalising of individuals.

3.22 15 (37%) respondents provided views to contest the introduction of PSPOs in Northern Ireland. The Landlords Association, Community Restorative Justice Ireland and PCSPs all highlighted the criticism which these powers had attracted following their introduction in England and Wales, particularly in how PSPOs have been implemented by councils, and questioned the merits of introducing what they perceived to have proven to be a controversial power in England and Wales to Northern Ireland. Respondents also noted concerns at how these powers had been used to disproportionately target young people and society's most vulnerable, criminalising behaviours which are not necessarily criminal offences. They also raised concerns that use of PSPOs would only displace issues, rather than address them, and outlined the lengthy and potentially expensive process in obtaining these Orders.

### **Question 7: What are your views on Closure Powers?**

### **Question 8: What would your views be if Closure Powers were introduced in Northern Ireland?**

#### **Response**

3.23 37 (74%) of the 50 respondents expressed views on whether Closure Powers should be introduced in Northern Ireland.

3.24 28 (76%) of respondents were generally supportive of the powers to close premises associated with significant and persistent nuisance or disorder and would, in principal, support their introduction in Northern Ireland. General support came from a range of respondents including members of the public, PCSPs and social

housing providers. This support was based on a view that these powers would provide relevant authorities with a tool to take rapid and effective action to help protect individuals and communities. However, this support had a number of caveats including the concerns about rendering people homeless by excluding them from their homes, appeals process, additional information and discussion being required on whether these powers should be limited to business premises, or extended to housing providers. A number of respondents indicated that they would like these powers to be available to councils, landlords and police.

3.25 Respondents also saw these powers as acting as a potential deterrent to owners of premises associated with persistent nuisance or disorder, and may encourage them to take responsibility for appropriate management of their property.

3.26 4 (11%) respondents expressed concerns. Community Restorative Justice Ireland noted that while these powers may be useful if used in a proportionate way to target drug dealing, overall they had reservations and sought clarity on the intended range of issues these powers were meant to address, and the evidential test for enforcement. They also saw impact assessments as being an essential requirement to prevent the most vulnerable of society being rendered homeless. Some respondents also raised concerns regarding the types of premises which could be subject to closure powers - licensed premises, business premises or residential properties.

3.27 5 (14%) respondents were opposed to the introduction of closure powers. They were concerned that the proposals were too severe to address ASB. They questioned whether there was any indication this power has been successful in England & Wales. They also expressed a concern that these powers could be used as a tool for evicting tenants rendering them homeless. Responses from the hospitality industry, Hospitality Ulster and Wineflair, suggested that these powers were unnecessary as there were already provisions for closure powers under the Licensing (NI) Order 1996, and were concerned that the introduction of further closure powers would negatively impact on their industry. They emphasised their opposition to the introduction of powers for anticipated disorder.

**Question 9: What are your views on the noise nuisance powers that are currently available in Scotland under the Civic Government (Scotland) Act 1982?**

**Question 10: What would your views be should these powers under the Civic Government (Scotland) Act 1982 be introduced in Northern Ireland?**

### **Response**

3.28 35 (70%) of the 50 respondents expressed views on whether these noise nuisance powers should be introduced in Northern Ireland.

3.29 25 (71%) of these responses were generally supportive of additional powers aimed at controlling noise nuisance. Members of the public expressed their support for the introduction of these powers as they viewed the current process for dealing with noise nuisance as slow and inadequate. Responses from the housing sector, NILGA, and councils were also generally supportive of these powers, viewing them as a useful addition to existing council environmental powers. However, they did question if the powers outlined in the consultation document were similar to those already available to councils in Northern Ireland under the Noise Act 1996. They queried if these powers would be made available to council officials; and voiced a concern regarding the impact on police resources unless powers were extended to council officers. They also raised the issue of clarity and guidance on the evidential test for causing another person annoyance.

3.30 8 (23%) responses from PCSPs and student representatives had reservations. They indicated that they would require more information to inform their views. Whilst they recognised the potential which these powers could have from a complainant's perspective, they were concerned about the potential for over-zealous enforcement and negative impact on individuals' rights. In some instances they also emphasised, that in addition to the rigorous oversight which would be required if these powers were introduced, they also had concerns regarding the safety of officers tasked with entering premises to seize equipment, and potential claims for damage.

3.31 2 (6%) respondents were opposed to the introduction of noise nuisance powers. The key concerns expressed by these respondents were summarised by the Law Society in their response when they questioned who would determine what constitutes 'reasonable cause for annoyance', proportionate police response, and when property may be seized. They also suggested the inclusion of information on the operation and implementation of these powers in Scotland would have been useful when asking for views on the potential for introducing these powers to Northern Ireland but, on balance, thought the suggested powers may be excessive and disproportionate and open to arbitrary enforcement.



#### **4. ADDITIONAL COMMENTS**

4.1 Other issues raised in the consultation responses included the lack of a clear definition of what constituted ASB, and the blurring of civil and criminal law.

Respondents also suggested that legislation in itself would not provide a solution to the range of behaviours which were negatively impacting on the quality of life within local communities, and as part of a wider problem-solving approach to this issue consideration should be given to the operation of local partnerships such as ASB Forums, who have a remit in helping to address ASB at a local level.

4.2 Respondents also suggested consideration of the following powers which had been introduced in the Anti-Social Behaviour, Crime and Policing Act 2014:

- Four respondents referred to the community trigger power which allows victims to require agencies to carry out a review of their response to the ASB they reported where they feel they did not get a satisfactory response;
- One respondent referred to dispersal powers (police power to disperse individuals or groups causing or likely to cause ASB in public places);
- One respondent referred to absolute ground for possession (possession of houses or dwellings on ASB grounds) ; and
- One respondent queried why the consultation had sought views on Criminal Behaviour Orders (which replaced Anti-social Behaviour Orders on conviction) but had not sought views on Crime Prevention Injunctions which replaced Anti-social Behaviour Orders on application.

## **5. CONCLUSION AND WAY FORWARD**

5.1 The consultation process has attracted a broad range of views, raising many important issues and providing further insight into the potential challenges that may be faced in implementing any of these proposals in Northern Ireland. The DoJ wishes to thank all respondents to the consultation for their invaluable input.

5.2 In a number of instances respondents raised queries regarding the legislative/regulatory powers referred to in the consultation document, and questioned if there were already similar powers available in Northern Ireland. This was particularly the case in terms of powers to deal with ASB related to the consumption of alcohol in public places and to noise. We have therefore held initial discussions with relevant departments to provide clarity on the queries raised, and to help determine the way forward.

5.3 The Department of Communities has confirmed that given the practical challenges which had been encountered around the commencement of sections 68 to 72 of the Criminal Justice (NI) Order 2008 (relating to confiscation of alcohol, which was intended to address weakness in the current council bye-laws on drinking in public) they will, in conjunction with the Department of Justice, make a joint approach to councils to revisit this issue, and to consider alternative solutions to improve the operation of existing council bye-laws.

5.4 The Department of Agriculture, Environment and Rural Affairs (DAERA) has confirmed that a range of civil powers are already available to help address concerns regarding noise related ASB. These current powers include fixed penalty notices, prosecution and seizure of noise-making equipment. Section 10 of the Noise Act 1996, together with the Noise Act Direction, provide details of the seizure powers which are currently available in Northern Ireland and detailed guidance on permitted noise levels. Details of these powers are outlined in the guidance document, *The Noise Act 1996 - Guidance to District Councils*, which they produced to inform district councils of amendments made to the Noise Act 1996 by the introduction of the Clean Neighbourhoods and Environment Act (Northern Ireland) 2011.

5.5 DAERA has also confirmed that they compile an annual statistical report of Noise Complaints Statistics for Northern Ireland. This is based on statistics provided by district councils which highlights the numbers of noise complaints received by councils, and the range of actions taken by them and their partners to address these complaints. In light of this information, and given that there has been no compelling evidence at this stage to indicate that there are operational difficulties in the implementation of these powers, no further legislative requirement is considered necessary in relation to seizure powers available under the Civic Government (Scotland) Act 1982 at this time. If new or compelling evidence is provided at a future point this position will be reviewed. In relation to comments that the current system may be slow and inadequate, this information has been shared with DAERA for further consideration.

5.6 Respondents raised a number of valid queries regarding the detail provided in the consultation to inform their views, and queried the availability of evidence to indicate to what degree powers introduced under the Anti-social Behaviour, Crime and Policing Act 2014 had been successful in tackling ASB. The DoJ will, where available, seek to source this information, to help inform considerations of any potential future legislative developments. Given the cross cutting nature of this work we will liaise with key stakeholders to ensure their commitment to this process and to help inform consideration of the legislative and non-legislative issues raised by respondents.

5.7 The DoJ has also noted the views which have been expressed during this process that legislation in itself will not provide the solution to the ASB which is occurring in our communities; as legislation does not resolve the underlying socio-economic factors associated with higher levels of ASB and that more effective partnership working is essential to prevent and address ASB in order to achieve sustained results.

5.8 The DoJ can confirm that no proposals for additional legislation will be developed, without further consideration of the requirement for such legislation, and consideration of how it could best be implemented, should it be deemed necessary. In addition, no decisions will be made on whether proposed legislative changes will

take place in the absence of a Minister. If a decision is made at a future date for the DoJ to consider the introduction of any new legislative powers to help address ASB, a full policy screening exercise will be undertaken prior to a further consultation process to ensure that any suggested proposals will not adversely affect any particular group.

5.9 The DoJ will also consider the points raised regarding local partnership working and will consult with the relevant authorities who operate ASB Forums to seek their views on their operation and any improvements to the collective sharing of information and joined up working to address local issues.

## **ANNEX A LIST OF RESPONDANTS**

<b>Consultation Respondents</b>
Antrim and Newtownabbey PCSP
Ards & North Down PCSP
ARK Housing
Armagh, Banbridge and Craigavon Council
Armagh, Banbridge and Craigavon PCSP
Belfast City Council
Belfast PCSP
Colin Community Safety Forum
Community Relations Council
Community Restorative Justice, Ireland
Council for Nature Conservation and Countryside
Department for Communities
Derry and Strabane PCSP
Environmental Health (Mid Ulster)
Family Planning Association
Fermanagh and Omagh Council
Fermanagh and Omagh PCSP
Green Party
Holyland Regeneration Association
Hospitality Ulster
Include Youth
Landlords' Association NI
Law Society
Lisburn and Castlereagh Council
Lisburn and Castlereagh PCSP
Mid and East Antrim PCSP
Newry, Mourne and North Down PCSP
NIACRO
NI Commissioner for Children and Young People
NI Federation of Housing Associations
NI Housing Executive
NI Local Government Association
NI Policing Board
NI Students' Union – NUS/USI
NI Youth Forum
Probation Board
Public Prosecution Service
Queen's University
Sinn Fein
St Peter's Immaculate Youth Centre
Supporting Communities charity
Ulster Unionist Party
Wineflair
Youth Justice Agency
Six responses were also received from private individuals