

Anti-Social Behaviour and Hate Crime Policy

1. Introduction

1.1 We work hard to ensure our neighbourhoods, homes and estates are peaceful, safe places to live. We do this by:

Taking action to address, educate and stop anti-social behaviour and hate crime

We are committed to doing all we can to prevent and tackle anti-social behaviour, hate crime and harassment involving or impacting upon our customers in their communities. We will also address anti-social behaviour, hate crime and harassment inflicted by customers on A2Dominion employees, contractors or others representing the organisation.

Taking a harm-centred approach

This means considering the type of behaviour being reported and the impact this is having on the complainant and the wider community. We also look at the support and intervention we can offer the perpetrator.

We do this by offering to complete a risk assessment and then discussing this with the complainant. This helps us identify any additional risk factors that need to be taken into consideration and guides our response to reduce any risks. We will find the best way to handle the anti-social behaviour and/or hate crime and respond based on the harm caused.

This could involve taking steps to protect people and working with local partners who have the right resources to solve the issues.



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- 1.2 This policy was written in line with the Regulator of Social Housing's Neighbourhood Consumer Standard required outcome 1.3.1. This requirement expects housing associations to work in partnership with relevant organisations to deter and tackle anti-social behaviour and hate crime where they have homes.

2. Defining Anti-Social Behaviour

- 2.1 Anti-social behaviour (ASB) is defined in different ways based on the legislation being used to deal with it. It may involve conduct which:
- Has caused, or is likely to cause, harassment, harm or distress to any person
 - Is capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises
 - Is capable of causing housing-related nuisance or annoyance to any person
 - Consists of, or involves using or threatening to use, housing accommodation owned by or managed by a relevant landlord for an unlawful purpose.

3. Implementation

- 3.1 We have a dedicated, specialist Anti-Social Behaviour Resolution Team to deal with cases of ASB and hate crime.
We will:
- Make sure that our customers can report ASB and hate crime easily through a range of methods including online, telephone and in person.
 - Respond to complaints within 2 working days; to take details of the complaint and where possible agree an action plan.
 - Communicate every 2 weeks with everyone who has reported ongoing anti-social behaviour and/or hate crime, using their preferred method of communication.
 - Make sure communication is clear and that it provides updates on the actions being taken.
 - Where behaviours raised are not considered to be ASB we will provide clear information to customers and offer guidance and advice to encourage them to deal with the situation themselves.
 - Encourage and help customers to solve their differences

themselves when possible, promoting positive community relationships. This may include offers to consider mediation as a proven means of dispute resolution where appropriate.

- Use a variety of available remedies to tackle ASB and hate crime including preventative and enforcement measures.
- Consider and arrange support for both the complainant and perpetrators of ASB where appropriate, and possible.
- Work in partnership with other agencies to prevent and respond to ASB within communities.

3.2 The Regulator of Social Housing sets standards and carries out robust regulation of social landlords. They are supported in this by Tenant Satisfaction Measures which enable tenants to scrutinise their landlord's performance and give landlords insight into where they can improve.

We report incidents of ASB and hate crime to the Regulator of Social Housing as part of the Tenant Satisfaction Measures.

4. Right and obligations

4.1 We will make sure that there is a fair balance between the rights of the person/s making a complaint, the person/s causing the issue, and the responsibilities of A2Dominion when deciding how to handle a case.

4.2 Where complainants and communities are dissatisfied with the response to their ASB and/or hate crime complaint, they have the right to ask for a review of their case. This is done through what's called an ASB Case Review Process (formerly known as the Community Trigger process). They can ask for the case to be reviewed by a multi-agency panel. We will engage fully with partner agencies to review cases and agree actions where an ASB Case Review is requested.

4.3 We have a Complaints Policy and Complaints Procedure in place that gives customers the right to file a complaint if they believe we did not follow our ASB and Hate Crime policy and procedure, and as a result, provided them with poor service.

4.4 In some cases, the alleged ASB and/or hate crime will not result in direct intervention by A2Dominion. This might be because the alleged perpetrator isn't known or isn't an A2Dominion customer. Sometimes it may be because the issue being reported isn't considered ASB. We will

offer advice or signpost residents to alternative solutions in these circumstances.

5. Preventative strategies

5.1 We will work to prevent and deter ASB in several ways, including:

- The design of homes and their environment, using a “secured by design” approach which looks at how layouts of housing estates can improve security.
- Identifying customers that may require additional support to maintain their tenancy.
- Regularly reviewing our data to understand if customers with protected characteristics or other groups of customers are more affected by ASB and/or hate crime than others. We will use this information to adapt our services to meet their needs and reduce any inequality.
- Working with other agencies to provide support to customers with difficulties such as drug or mental health problems.
- Working with agencies such as the police, local authorities and social care teams that may support early intervention and prevention strategies.

6. ASB remedies

6.1 When necessary, we will take a step-by-step approach by using early actions and solutions that do not involve legal measures to address Anti-Social Behaviour (ASB). These may include, but are not limited to:

- Personal resolutions, including encouraging use of the Good Neighbour Card, which is a tool to empower customers to approach their neighbours in a controlled way, by letting them know how their behaviour is affecting them. A copy of the card is available on our website
- Mediation
- Verbal or written warnings
- Acceptable Behaviour Contracts (an agreement by one or more parties involved to change their behaviour)
- Parental Control Agreements
- Offering or referring to support services/agencies
- Working with other agencies e.g. the police, community mental health teams, environmental health, etc.
- Assisting with additional security measures

- Offering access to the Noise App which helps you to measure levels of noise. While noise isn't an ASB issue in the first instance we can offer advice on how to resolve concerns
 - Legal remedies such as those outlined below
- 6.2 We will take enforcement action where necessary and appropriate. In the first instance, we will issue a formal warning of possible legal action if the ASB continues.
- 6.3 In serious cases, such as those involving immediate risk of harm, warnings may not be suitable and immediate legal action may be required. We may take legal advice to determine the most suitable course of legal action, based on the type of ASB and the evidence available. The main legal actions that we can take are:
- A civil injunction to stop threats, intimidation, violence and or any other breaches of tenancy by the perpetrator. This can be used against any person, not only A2Dominion tenants.
 - A Community Protection Notice. These are designed to stop a person aged 16 or over, business or organisation committing antisocial behaviour (ASB) which affects the community's quality of life (only in areas where the local government has given us authority to do this.)
 - Working with other agencies on enforcement action (e.g., working with the police in relation to their closure orders)
 - Demotion Orders. This changed the type of tenancy a person has and means we can apply to court quicker for possession of a home.
 - Possession proceedings. This is a court process landlords apply for when they want a tenant to leave their home.

7. Supporting victims, witnesses and complainants

- 7.1 We will consider the views of victims, witnesses, and complainants when deciding what actions to take. Where appropriate, we will try to agree the actions, keep complainants updated and review matters when the case is closed. There may be times we have to consider taking action without the support of the complainants but will endeavour to inform customers in these situations.
- 7.2 We will refer to our Safeguarding Policy if we feel a customer or a member of their household is at risk of harm

8. People in vulnerable situations

8.1 We are committed to supporting customers through a variety of methods including but not limited to:

- Making assessments with other agencies prior to the start of the tenancy to ensure customers can manage and sustain their tenancy.
- Providing sensitive lettings. This means we consider if there has been ASB in a home when we next let it to give respite to the neighbours and community who continue to live there.
- Making referrals to appropriate support services.
- Understanding that some customers may prefer to appoint someone to represent them and handle their affairs.
- Working with official and voluntary organisations that offer support services.
- Participating in case conferences with multiple agencies such as the police, local authorities, support services and social services.
- Discussing with other agencies, such as local authorities and mental health teams, about the suitability of accommodation.

8.2 The following list (which is not exhaustive) may assist A2Dominion colleagues in identifying customers with additional support needs, or those that may be at risk of breaching their tenancy:

- People that suffer with mental health illness.
- Residents with alcohol and drug dependency.
- Young people leaving care.
- Single and people living alone who have not had their own tenancy before.
- People at risk through unhealthy living conditions.
- Older people.
- Supported housing tenants.
- People with physical disabilities
- People experiencing domestic abuse or harassment.
- People that have recently been homeless.
- People that have recently left prison.
- People that have been trafficked.

9. Hate crime and incidents

9.1 Hate crime and incidents are defined as incidents, alleged incidents or criminal offences which are perceived by the victim or any other person, to be motivated wholly or partly by hostility or prejudice, based on:

- a person's disability or perceived disability;
 - race or perceived race;
 - religion or perceived religion;
 - sexual orientation or perceived sexual orientation; or
 - transgender identity or perceived transgender identity.
- 9.2 We recognise the significant impact this can have on victims and the communities they live in.
- 9.3 Further to the steps we take to address ASB, we will also take the following steps to deter and tackle hate incidents and crimes:
- Develop links with other stakeholders such as the police, local authorities, and racial equality councils in the areas of our operation.
 - Where appropriate, gather evidence against perpetrators of racially aggravated offences and other behaviour motivated by hate.
 - Deal with damage and vandalism directly related to acts of harassment and intimidation urgently, e.g., removal of racist or offensive graffiti within 24 hours where possible.
 - Provide additional support for victims, which may involve repairing doors and windows if damaged, installing additional security measures such as locks, offering referrals to specialised support services, and working with these services to provide further assistance.
 - Encourage customers to report issues by asking about the perceived motivation of the incident when completing a risk assessment.

10. Multi-agency partnerships

- 10.1 We will actively engage in multi-agency initiatives and partnerships to help address and prevent ASB and hate crime.
- 10.2 As part of the Crime and Disorder Act 1998, A2Dominion will actively join multi-agency groups in all areas we operate. We will also provide information and take part in ASB Case Reviews when invited.
- 10.3 Where appropriate we will work with other statutory agencies such as the police, local authorities, social services teams, voluntary agencies and groups such as Victim Support, other landlords and customer groups to try to find solutions for ASB and hate crime.

11. Confidentiality

- 11.1 If you give us your details when you report an incident, we will not share your name without speaking to you about it first and will keep your details confidential. In some cases, neighbours might be able to guess that you have reported the incident to us. Under certain circumstances we may have to share your details with the police and/or social services, or we would be breaking the law.
- 11.2 We may also have to disclose who you are if we need to get an injunction, if the person you have reported is prosecuted, or if we take other types of legal action. Whatever we do though, we will discuss it with you first. We will store all your information securely as required by the [Data Protection Act 2018](#).
- 11.3 If you wish to make a report anonymously, we will not be able to provide you with updates on the case as your details will not be recorded against the report. We will do what we can to resolve the ASB but this may be limited if we are unable to contact you to obtain further information. To report a crime anonymously, you can contact Crimestoppers on 0800 555 111 or make a report online at crimestoppers-uk.org

12. Self-help: Speaking to the person causing the ASB

- 12.1 At first, and if appropriate, we will usually ask a customer to make a friendly approach to the neighbour causing the perceived ASB. Customers are also encouraged to use A2Dominion's Good Neighbour Card, a template that helps you to write a note to your neighbour. However, if the alleged perpetrator is known to be violent, then we advise against approaching them.

13. Data protection and exchanging information

- 13.1 The protection of personal data is of great importance to A2Dominion Group and more than just a legal obligation.
- 13.2 A2Dominion Group and affiliate organisations are the data controllers registered with the ICO with the following registration numbers:
- A2Dominion Housing Group Limited: Z4843307
 - A2Dominion Homes Limited: Z9799978
 - A2Dominion South Limited: Z7835340
 - A2Dominion Housing Options Limited: Z5412073
 - A2Dominion Residential Limited: Z3391351

- A2Dominion Developments Limited: ZA103931
- Pyramid Plus London LLP: Z3594227
- Pyramid Plus South LLP: Z3594230

- 13.3 Our data protection policy and procedures are governed by the Data Protection Act 2018. We collect and process personal information in order to provide housing services and meet our contractual and legal obligations. All persons authorised to receive personal data are obliged to handle personal data in accordance with applicable laws and regulations at all times.
- 13.4 For information on how we collect, store, process and use customers' personal data, please visit our website on <https://www.a2dominiongroup.co.uk/privacy-and-cookie-policy>.
- 13.5 For employee related privacy statement, please contact our HR team at people.support@a2dominion.co.uk.
- 13.6 You can also contact the Data Protection Officer / Data Compliance team at governance@a2dominion.co.uk.
- 13.7 We will seek to sign up to and regularly review Information Sharing Protocols with partner agencies.

14. Colleague training

- 14.1 We regularly train and involve our team members in various development activities to ensure that when handling ASB and hate crime, they:
- Understand and can effectively use the Anti-Social Behaviour and Hate Crime Policy alongside related policies and procedures.
 - Are aware of all available legal and non-legal solutions.
 - Are aware of the support services available for victims of ASB and hate crime.

15. Media strategy

- 15.1 A2Dominion may publicise successful actions taken against persons responsible for ASB and hate crime using press releases, A2Dominion's customer newsletter and the Group's website.
- 15.2 If we act with other agencies, we will agree the media strategy with these partners, for example, publicising details of a Court Order that has successfully been obtained against a perpetrator on various media.

16. Consultation

16.1 This policy has been developed in consultation with teams across operations, policy, safeguarding, complaints and communities. It was shared with our customer scrutiny panel to ensure the policy is clear, fair and provides useful information and approved by our Customer Service Committee.

17. Equality and diversity

17.1 A2Dominion, staff, partners, stakeholders and contractors are committed to providing services, which are relevant and appropriate to the needs of our residents. We will treat everyone fairly and without discrimination.

17.2 We will ensure that all our services relating to this policy are accessible and available for all customers as set out in the requirements of the Equality Act 2010.

18. Associated documents

- Anti-Social Behaviour procedure
- Allocations policy
- Complaints policy
- Domestic Abuse policy
- Good Neighbour policy
- Safeguarding Adults policy
- Safeguarding Children policy
- Tenancy policy