

ANTI-SOCIAL BEHAVIOUR POLICY



1. Background and objectives

- 1.1. This Policy sets out how we will deal with Anti-Social Behaviour and work to make our customers and communities safer.
- 1.2. We recognise that Anti-Social Behaviour can have a significant and disruptive impact on the lives of our customers and communities. We take Anti-Social Behaviour seriously and are committed to taking all reasonable action, using the powers available to us, to seek resolution. It is important that our customers and communities are clear about how and when we can intervene.
- 1.3. This policy applies to all general needs, affordable rent, sheltered and supported housing customers living in a home owned, part owned or managed by Alliance Homes. It also applies to our licensees, leaseholders, shared ownership, market rent and commercial premises, although our intervention may vary depending on tenure type.
- 1.4. The Policy aims to:
 - Ensure we are effective in our approach to preventing and tackling Anti-Social Behaviour.
 - Define what we consider as Anti-Social Behaviour so that customers and partners have clear expectations.
 - Set out the service standards our customers can expect when reporting Anti-Social Behaviour.
 - Outline how we will work in partnership to make the communities we operate in safer.

2. Definitions & Legislative Context

- 2.1. Alliance Homes will follow the definition given by UK Government in The Anti-Social Behaviour, Crime and Policing Act 2014:
 - 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, that is, directly or indirectly relating to our housing management function.
- 2.2. We will investigate and take appropriate action where the Anti-Social Behaviour is persistent, deliberate, and preventable or is a single serious incident that comes within the definition.
- 2.3. The Police and CPS define a Hate Crime as "any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."
- 2.4. We will apply the same definition to classifying an incident of Anti-Social Behaviour as Hate-related and work with appropriate support agencies and the Police to escalate such cases.

ANTI-SOCIAL BEHAVIOUR POLICY



- 2.5. A table of case categories and how they will be treated by Alliance Homes can be found at Appendix 1.
- 2.6. Our approach to dealing with Anti-Social Behaviour will also be governed by the following legislation as required:

Legislation	Summary of Relevance
Housing Act 1985	Sets out grounds for taking possession of a property based on anti-social behaviour (ground 14) or breach of tenancy (ground 12)
Housing Act 1996	Amended Act bringing introductory tenancies and allowed Anti-Social Behaviour to be factored into the allocation of housing. Extended the scope of the 1985 Act to take possession action relating to behaviour of visitors, illegal use of the property and Domestic Abuse
Anti-Social Behaviour Act 2003	Requires Social Landlords to prepare and publish Anti-Social Behaviour Policies. Allows an application to “demote” a tenancy to a less secure type in response to Anti-Social Behaviour.
Anti-Social Behaviour, Crime and Policing Act 2014	Condensed the powers available to police in responding to Anti-Social Behaviour to six elements (injunctions to prevent nuisance, criminal behaviour orders, dispersal powers, community protection notices, public space protection orders, closure orders). Also introduced a mandatory possession ground where the tenant has been convicted of a serious criminal offence.
Equality Act 2010	Protects groups in society with certain protected characteristics from discrimination
General Data Protection Regulations 2018	Governs how organisations collect, store, and use data

3. Customer Centred & Solution Focused

- 3.1. We are committed to providing an empathetic, supportive, and professional service to anyone reporting Anti-Social Behaviour.
- 3.2. Customers raising an Anti-Social Behaviour issue will speak to a specialist staff member at first point of contact. If the issue is raised via another team, they will be referred to the specialist team as soon as possible.
- 3.3. If a customer issue is not classed as Anti-Social Behaviour, we will clearly explain why and make every effort to refer them to relevant internal or external team that can assist.
- 3.4. Customers will have a dedicated, named Anti-Social Behaviour staff member for the lifetime of their case.

ANTI-SOCIAL BEHAVIOUR POLICY



- 3.5. Staff will always obtain customer permission to raise the Anti-Social Behaviour issue with other parties, except in cases where there is a criminal implication or severe risk of harm.
- 3.6. Customers will be contacted regularly throughout a case and prior to case closure with an explanation of action taken.
- 3.7. Customers will be pro-actively contacted after case closure to establish if any further issues exist – cases may be re-opened at this point without the customer needing to restart the process.
- 3.8. Customer satisfaction with their experience of reporting Anti-Social Behaviour will be tracked and reported (see section 9 for more detail).
- 3.9. We will be clear with all parties at the outset of an Anti-Social Behaviour case what solutions are relevant to the issue and how these will be pursued.
- 3.10. Customers reporting Anti-Social Behaviour will complete an action plan with their case officer which will outline the actions to be taken to resolve the case.
- 3.11. Staff will be empowered to identify and implement practical solutions to cases that prevent unnecessary escalation.
- 3.12. Where relevant solutions may involve support from other teams or agencies, case officers will ensure these links are made and act as a co-ordinator to bring the case to a resolution.

4. Clear Communication

- 4.1. Our communications with all parties to an Anti-Social Behaviour issue will be clear, accessible and avoid jargon (aside from any legal references we are required to make).
- 4.2. We will establish the preferred method of communication for customers reporting Anti-Social Behaviour and use this as far as possible in managing their case.
- 4.3. We will provide clear information on our Website and Customer Portal (when live) that outlines our definition of Anti-Social Behaviour and what customers can expect from the process of reporting an issue.

5. Reasonable

- 5.1. The action we take to tackle Anti-Social Behaviour issues must be reasonable and take full account of the impact on individuals and communities, whilst also recognising the challenges facing all parties to the complaint.

ANTI-SOCIAL BEHAVIOUR POLICY



- 5.2. Officers will receive regular training on the tools and powers available to resolve Anti-Social Behaviour issues and the circumstances in which they are appropriate to use.
- 5.3. In considering formal action, cases will be quality checked by the relevant manager to ensure the action is reasonable and that all relevant actions have been considered.
- 5.4. As an organisation subject to the Public Sector Equality Duty, we will assess any adverse impact to customers with protected characteristics when we consider possession action.

6. Preventative

- 6.1. We will give, clear relevant information to customers on their responsibilities regarding conduct and what is considered Anti-Social Behaviour.
- 6.2. We will work alongside the Lettings Policy to identify potential Anti-Social Behaviour risks in any allocation.
- 6.3. We will use our local partnerships to raise awareness of services that can tackle Anti-Social Behaviour, through community events, surgeries, schools, and other projects.
- 6.4. We will utilise our outbound communications, including social media, to provide information to customers that can help prevent Anti-Social Behaviour issues occurring.
- 6.5. We will, where deemed necessary, make property-based alterations that can prevent future Anti-Social Behaviour reports or make the environment safer.

7. Working in Partnership

- 7.1. A clear partnership agreement that involves joint responses, escalation, referral routes and timely information sharing is crucial to tackling Anti-Social Behaviour and keeping communities safe.
- 7.2. We will work with services that can support those experiencing Anti-Social Behaviour through professional conflict management and responding to hate incidents.
- 7.3. We will work with Local Authority multi-agency groups to provide a joined-up response to both complex cases and community wide Anti-Social Behaviour issues.
- 7.4. We will liaise regularly with local Police, Community Support and Fire and Rescue services with regards to specific cases and prevention projects.

8. Legal Action

- 8.1. We may consider legal action in cases of persistent Anti-Social Behaviour where other measures have not been successful, or in situations that present an immediate risk to individuals or communities.

ANTI-SOCIAL BEHAVIOUR POLICY



- 8.2. We may, as a last resort, commence legal action to take possession of our property in line with the relevant legislation where there are continuous and severe breaches.
- 8.3. Where new customers are under a starter tenancy and breaching this through proven Anti-Social Behaviour, we may consider acting under Section 21 to end the tenancy before it converts to assured.
- 8.4. Our legal action may involve preventing certain actions or behaviours via civil injunction, exclusion order or closure order (in partnership with other agencies holding relevant statutory powers).
- 8.5. Possession action will be approved by the Tenancy Sustainability Manager. Applications for eviction based on possession proceedings being granted will be approved by the Head of Customer Experience (Housing).

9. Satisfaction and Complaints

- 9.1. We will conduct satisfaction surveys at the conclusion of each Anti-Social Behaviour case to understand how customers have experienced the service and where we could improve. Anti-Social Behaviour will also form part of the wider Tenant Satisfaction Measures that Alliance Homes will collect from all customers.
- 9.2. Upon closing an Anti-Social Behaviour case the closure correspondence will direct the customer to Alliance Homes internal complaints process if they are dissatisfied with any element of their experience.
- 9.3. Alliance Homes will actively take part in the Anti-Social Behaviour Case Review process, in which any customer who is dissatisfied with the organisational response can launch a case review coordinated by the Local Authority.

10. Monitoring and Review

- 10.1. The impact of this policy will be monitored through the following measures:
 - Monitoring the volume and outcomes of Anti-Social Behaviour cases monthly
 - Monitoring satisfaction of customers experiencing the Anti-Social Behaviour service monthly
- 10.2. The Tenancy Sustainability Manager is responsible for the implementation, monitoring and review of this policy.
- 10.3. Owners of related policies and procedures (as referenced in Section 12) will be expected to assess the impact of any policy change in their area on Alliance Homes delivery of an effective Anti-Social Behaviour service.
- 10.4. This policy will be reviewed within two years of its approval date.

ANTI-SOCIAL BEHAVIOUR POLICY



11. Equality and diversity

- 11.1. This policy is subject to a periodic Equality Impact Assessment (EIA).
- 11.2. The purpose of such an assessment is to consider the effect of the policy regarding the recognised protected characteristics of equality and ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Policy. Remedial action will be undertaken if a detrimental effect is identified.
- 11.3. The EIA also requires the policy author to consider whether the policy is likely to negatively impact on a person's Human Rights.
- 11.4. This policy and any other related Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

12. Associated documents

12.1. Reference should be made to the following internal documents when reading this policy:

- Domestic Abuse Policy
- Safeguarding Policy
- Lettings Policy
- Anti-Social Behaviour Procedure
- Tenancy Management Procedure
- Person Alert Procedure
- Domestic Abuse Case Management and Support Procedure
- Starter Tenancy Procedure

13. Version control and approval dates

Approval stage	Date completed
Equality Impact Assessment completed	20 th April 2023
EIA reviewed by specialist colleague within HR	24 th April 2023
SLT review / approval	24 th May 2023
Board or Committee approval	N/A
Next review date	31 st May 2025

ANTI-SOCIAL BEHAVIOUR POLICY



Appendix 1 – Table – What is Anti-Social Behaviour?

- Issues that are Anti-Social Behaviour will be dealt with by the specialist Anti-Social Behaviour team
- Issues that are Tenancy Management will be dealt with by the Tenancy Services team as part of managing the terms of the Alliance Tenancy Agreement.
- Issues that are Community & Environmental will be dealt with by the Community Environmental Team as part of their role in keeping communities tidy
- Issues that are classed as no involvement will not be dealt with by any team within Alliance in our role as a landlord and we will encourage customers to resolve these matters personally - in some cases another organisation may be most relevant to respond, and Alliance staff will signpost accordingly.

	<i>Anti-Social Behaviour</i>	<i>Community & Environmental</i>	<i>Tenancy Management</i>	<i>No Alliance Involvement</i>	<i>Another Agency</i>
Fly tipping (on Alliance owned land)		X			
Inconsiderate parking				X	
Parking disputes				X	
Routine Noise (DIY, Children Playing, day to day living noise)				X	
Abandoned vehicles (on Alliance owned land)		X			
Animal Cruelty or Neglect					X
Criminal Behaviour	X				
Cuckooing (taking over a vulnerable persons property for the purpose of drug dealing)	X				
Criminal Damage			X		
Drug supply and/or use	X				

ANTI-SOCIAL BEHAVIOUR POLICY



	<i>Anti-Social Behaviour</i>	<i>Community & Environmental</i>	<i>Tenancy Management</i>	<i>No Alliance Involvement</i>	<i>Another Agency</i>
Graffiti and Vandalism	X				
Harassment and intimidation	X				
Hate Incident/Crime	X				
Neighbour disputes (including boundaries)				X	
One off Parties/Celebrations				X	
Persistent noise/loud music	X				
Dog Fouling		X			
Dog Bites/Attacks	X				
Unsafe keeping of Pets (see Alliance Pet Policy)			X		
Prostitution/sexual acts	X				
Untidy Garden		X			
Verbal Abuse	X				

Appendix 2 Equality Impact Assessment

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Anti-Social Behaviour Policy – Phil Carroll, Tenancy Sustainability Manager

2. Aims of the SPPF being assessed.

- *Whose need is it designed to meet?*
- *Are there any measurable elements such as time limits or age limits?*

To ensure that the organisational response to Anti-Social Behaviour within Alliance properties and wider communities is clear to customers, proportionate and meets regulatory and best practice standards

3. Who has been consulted in developing the SPPF?

- *Make reference or links to consultation/evidence documents*

Alliance Homes Customer Panel via two workshops
Customer Consultation via HIVE
Howard Potheary, NSC, Safer Communities Lead
Michelle Harper, Housing Services Manager
Cath Pullin, Head of Customer Experience

4. Does the SPPF promote equality of opportunity?

The Policy promotes equality of access both in the variety of reporting methods and the tailored way in which we will liaise with complainants and collect evidence. The Partnerships that underpin the delivery of the Policy include specific workstreams relating to Hate Crime, race related incidents, support for LGBTQ+ communities and female victims of Domestic Abuse.

ANTI-SOCIAL BEHAVIOUR POLICY



5. Identify potential impact on each of the diversity “groups” by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):

- Might some groups find it harder to access the service?
- Do some groups have particular needs that are not well met by the current SPPF?
- What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?
- Have colleagues/residents raised concerns/complaints?
- Is there local or national research to suggest there could be a problem?

Protected Characteristic	No impact	Negative impact	Positive impact	Information source/s **	Comments/evidence
Race			X	ONS Crime and ANTI-SOCIAL BEHAVIOUR Statistics for England and Wales 2022	Individuals of non-white ethnicity are more likely to experience crime and ANTI-SOCIAL BEHAVIOUR incidents (black citizens 11% more reports, Asian citizens 6% more). Alliance works alongside multi-agency groups and specific support organisations tailored around BAME incidents and appropriate responses.
Disability			X	ONS Crime and ANTI-SOCIAL BEHAVIOUR Statistics for England and Wales 2022	Individuals classifying themselves as having a disability are statistically more likely to experience crime and ANTI-SOCIAL BEHAVIOUR incidents. Alliance Policy ensures that a variety of accessible reporting and communication routes are in place and also ensures officers consider the disabilities of all parties to a complaint in the decision-making process.
Gender			X	Alliance Domestic Abuse Policy 2022	** across all incidents of Crime and ANTI-SOCIAL BEHAVIOUR men and women are equally likely to experience and report this, however referring to the Alliance Domestic Abuse Policy 2022 we recognise that in this area women are more likely to experience this harm and require support.
Transgender	X				There is no data available to indicate that gender identity is a factor in levels of Anti-Social Behaviour, however this is an emerging area that Alliance Homes liaises with relevant partners to monitor.

ANTI-SOCIAL BEHAVIOUR POLICY



Protected Characteristic	No impact	Negative impact	Positive impact	Information source/s **	Comments/evidence
Sexual orientation			X	ONS Crime and ANTI-SOCIAL BEHAVIOUR Statistics for England and Wales 2022	Data indicates that individuals identifying as gay/lesbian/bi-sexual are twice as likely to experience Crime and ANTI-SOCIAL BEHAVIOUR than those identifying as heterosexual. Alliance
Religion or belief	X			ONS Crime and ANTI-SOCIAL BEHAVIOUR Statistics for England and Wales 2022	Crime and ANTI-SOCIAL BEHAVIOUR data evidence that all religious beliefs (and those with no faith) are statistically experiencing these issues on an equal basis
Age			X	ONS Crime and ANTI-SOCIAL BEHAVIOUR Statistics for England and Wales 2022	Statistics show that a large proportion (62%) of personal crime and ANTI-SOCIAL BEHAVIOUR incidents affect the age group 25-55. Alliance procedures and mechanisms for collecting evidence reflect this demographic
Marriage & Civil Partnership	X				There is no relevant data to indicate that marriage and civil partnership is a factor in levels of Anti-Social Behaviour
Pregnancy and Maternity	X				There is no relevant data to indicate that pregnancy or maternity is a factor in levels of Anti-Social Behaviour
Rural issue	X				There is no relevant data to indicate that rurality is a factor in levels of Anti-Social Behaviour
Social mobility	X				There is no relevant data to indicate that social mobility is a factor in levels of Anti-Social Behaviour

Was there a negative impact identified in question 5? No

ANTI-SOCIAL BEHAVIOUR POLICY



6. If “negative impact” identified in table (4) above is it?

Legal -

What is the level of impact? -

Yes	No
High	Low

If it is not legal and/or high impact – (i.e.: if you have highlighted **NO** to legal and **HIGH** to impact, then the document should be referred to Head of HR)

7. If positive impact has been identified in table 4 above, how can it be improved upon or maximised, either in this SPPF or others?

The positive impacts are maximised and continuously reviewed via two routes:

- Internally reviewing our processes and accessibility of our services to ensure that the groups referenced above do not experience barriers in reporting ANTI-SOCIAL BEHAVIOUR or engaging with the services we offer. In addition, the training given to staff addresses how to tailor responses to these groups as necessary.
- Externally participating in multi-agency groups that provide knowledge, expertise, and insight into the experiences of the above groups and improving their experience of the service.

8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)

- *Are there changes you could introduce which would make this SPPF work better for this group of people?*
- *Is further research or consultation required?*

9. Does this proposal have any potential Human Rights implications?

If yes, please describe (if necessary, please refer to the Alliance Homes Group Human Rights Policy)

No