



# ANTI-SOCIAL BEHAVIOUR POLICY

Originator:	Regulatory Compliance Team
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1	Introduction
1.1	Pine Court Housing Association (PCHA) strives to be the best at everything it does including being the best provider of landlord services. Central to this, is the role that PCHA plays in contributing to the creation of safer communities within the geographical areas where it owns and manages properties.
1.2	<p>Previously PCHA's provisions for dealing with Anti-Social Behaviour (ASB), domestic abuse and all forms of harassment were contained in one Policy. In recognition that these issues will affect people differently and require a tailored response, PCHA have now developed three separate but interlinked Policies that should be read in conjunction with each other, as follows:</p> <ul style="list-style-type: none"> <li>• The PCHA Anti-Social Behaviour Policy</li> <li>• The PCHA Domestic Abuse Policy</li> <li>• The PCHA Hate Crime and Harassment Policy</li> </ul>
1.3	The focus of this Policy is therefore the provisions PCHA puts in place for supporting customers who may experience ASB, providing rapid and effective responses and sending out a clear message that this type of behaviour will not be tolerated.
1.4	<p>In operating this Policy, OVH meets the requirements of the Regulatory Standards for Social Housing Providers, adopted by the Regulator for Social Housing (RSH) and updated April 2024, to work in partnership with other agencies in regard to anti-social behaviour and hate incidents, as follows:</p> <ul style="list-style-type: none"> <li>• Registered providers must have a policy on how they work with relevant organisations to deter and tackle ASB in the neighbourhoods where they provide social housing</li> <li>• Registered providers must clearly set out their approach for how they deter and tackle hate incidents in neighbourhoods where they provide social housing</li> <li>• Registered providers must enable ASB and hate incidents to be reported easily and keep tenants informed about the progress of their case</li> </ul>

	<ul style="list-style-type: none"> <li>• Registered providers must provide prompt and appropriate action in response to ASB and hate incidents, having regard to the full range of tools and legal powers available to them</li> <li>• Registered providers must support tenants who are affected by ASB and hate incidents, including by signposting them to agencies who can give them appropriate support and assistance</li> </ul>
1.5	<p>The Policy also assists PCHA to demonstrate compliance with relevant legislation. The most relevant legislation includes:</p> <ul style="list-style-type: none"> <li>• Housing Act 1985, 1988, 1996</li> <li>• Environmental Protection Act 1990</li> <li>• Dangerous Dogs Act 1989, 1991 and The Dangerous Dogs (Exemption Schemes) (England and Wales) (Amendment) Order 2024</li> <li>• Police and Justice Act 2006</li> <li>• Anti-Social Behaviour Crime and Policing Act 2014</li> <li>• Equality Act 2010</li> </ul>
1.6	<b>ASB response services to PCHA customers</b>
1.6.1	PCHA will investigate all reports of behaviours that fall within its definition of ASB from and about PCHA customers (see 1.7 below). The scope of this Policy includes occupants of properties that PCHA lets at 'social' or 'affordable rent' or 'rent-to-buy' and does not include those who are 'shared ownership' tenants or lessees.
1.6.2	PCHA will not normally provide the full range of ASB response services to owner-occupiers, private tenants, market rent tenants, tenants of other social / local authority landlords or shared ownership customers. People who fit into these categories would usually be expected to seek their own independent legal advice or work with their own landlord to find resolutions to ASB complaints.
1.6.3	PCHA will, however, still investigate reports of ASB from these groups where the alleged ASB is being perpetrated by PCHA customers and will endeavour within reasonable limits to keep them informed of actions taken to bring about resolutions, ensuring data protection protocols are maintained and working closely with other landlords and statutory agencies, where required.
1.7	<b>Anti-Social Behaviour (ASB)</b>
1.7.1	<p>PCHA adopts the same definition of ASB set out in the Anti-Social Behaviour, Crime and Policing Act, 2014) as follows:</p> <ul style="list-style-type: none"> <li>• Conduct that has caused, or is likely to cause, harassment, alarm or distress to any person</li> <li>• Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or</li> <li>• Conduct capable of causing housing-related nuisance or annoyance to any person</li> </ul>
1.7.2	In addition to the above, PCHA may treat behaviour from individuals where they fail to keep control over pets, (most notably dogs) as ASB and may take the appropriate tenancy or civil

actions if this presents a threat or annoyance to PCHA customers, staff or contractors. For more information, please refer to PCHA Responsible Pet Ownership Policy.

## 1.8 PCHA response to issues associated with ASB

- **Social media**

PCHA will not normally investigate or take action on exchanges involving its customers or for content shared on social media platforms (instead referring users of these platforms to the service providers own policies, where is made aware of any issues). However, where it is considered that content is being used to harass / intimidate or is otherwise connected with ongoing acts of ASB, this may be considered as relevant evidence for enactment of the provisions contained in this Policy or linked Policies ('Domestic Abuse' or 'Hate Crime and Harassment' Policies)

- **Noise**

Where customers report being affected by excessive noise, PCHA will advise customers to keep a diary detailing times / impact of the disturbance and to use applications available on smartphones to gather evidence. Occasionally, depending on the severity of the case, PCHA may contact and seek assistance from local authorities who have a statutory duty to prevent noise pollution and request they carry out their own investigations

- **Drugs**

Any reports in relation to drugs will be passed to the police as 'intelligence' and customers will be encouraged to report anything they witness directly to the police or to Crimestoppers. PCHA may choose to issue 'drugs warning cards' or where tenants are convicted of drugs related offences, take legal actions. The decision will be made on a case-by-case basis by PCHA dependent upon a number of factors which include (but are not limited to) the prospect for success, the impact on the local neighbourhood, the seriousness of the offence, the age of the offenders and the reasonableness of taking legal action

- **Other Crime**

PCHA may take action against tenants for criminal behaviour but will do so in manner supplementary to police action, not in place of it. Therefore, PCHA reserves the right to close the case if the customer refuses to engage with the police

## 1.9 Access and Communication

1.9.1 PCHA is committed to ensuring that our services are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.

1.9.2 Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.

## 1.10 Equality, Diversity and Human Rights

1.10.1 PCHA is committed to fairness and equality for all customers, colleagues, and stakeholders.

1.10.2 PCHA's approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, PCHA will meet or exceed its legal requirements as outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how PCHA will

	meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.
1.10.3	PCHA is fully committed to eliminating unfair and unlawful discrimination. Hate Crime, Harassment, and Bullying will also not be tolerated, and take proactive steps to prevent such behaviours.
1.10.4	<p>It is unlawful to discriminate directly or indirectly based on the following protected characteristics:</p> <ul style="list-style-type: none"> <li>• Disability</li> <li>• Gender</li> <li>• Gender identity, or gender reassignment status</li> <li>• Race, racial group, ethnic or national origin, or nationality</li> <li>• Religion or belief</li> <li>• Sexual orientation</li> <li>• Age</li> <li>• Marriage or civil partnership status</li> <li>• Pregnancy or maternity</li> </ul>
1.10.5	PCHA are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act.
1.10.6	PCHA regularly review policies and practices to ensure they reflect its commitment to equality and diversity.
1.11	<p>This Policy should be read in conjunction with the following documents:</p> <ul style="list-style-type: none"> <li>• The PCHA Domestic Abuse Policy</li> <li>• The PCHA Hate Crime and Harassment Policy</li> <li>• The PCHA Unacceptable Behaviour Policy</li> <li>• The PCHA Complaints, Appeals and Feedback Policy</li> <li>• The PCHA Grievance, Bullying and Harassment Policy</li> <li>• The PCHA Responsible Pet ownership Policy</li> </ul>
<b>2</b>	<b>Statement of Intent</b>
2.1	In setting the strategic direction of the organisation through the approval of Service Delivery Plans, PCHA's Board and Executive Management Team commit to supporting communities to create safer environments and communicating to all customers a culture of non-acceptance of anti-social behaviour.
2.2	PCHA will communicate its expectations of behaviour from the outset of the landlord / tenant relationship and throughout the period of the tenancy. PCHA will expect the tenant to abide by the terms and conditions of the tenancy agreement at all times including any financial obligations owed to PCHA.

2.3	In dealing with cases of ASB, PCHA's expectation from tenants will extend to them cooperating in investigation processes and where it is safe to do so, taking reasonable steps to resolve issues. This may include speaking directly with neighbours or those responsible for alleged ASB, recording incidents and by agreement, when absolutely necessary, attending court.
2.4	PCHA is committed to investigating all reports that it deems to be ASB that impact on the lives of its customers and will endeavour to work with them to formulate an appropriate response and will involve external agencies, where required.
2.5	In all cases PCHA will take steps to keep those making reports informed / involved of all actions taken.
2.6	PCHA will ensure its ASB and domestic abuse services are easily accessible and incidents can be reported in a number of ways, including in person to any PCHA officer or others acting on PCHA's behalf during the conduct of their duties, via telephone, online or in writing. PCHA will also deal with reports of ASB or domestic abuse that it receives from third parties, support agencies or advocacy groups.
2.7	PCHA will tailor its ASB services to meet individual customer needs, providing support to victims and witnesses and where PCHA deem it necessary, taking emergency action where there is a risk of significant harm to the individual customer or member of their household. This may involve taking action directly, or signposting to another agency if this is more appropriate.
2.8	PCHA will seek, wherever possible, to find comprehensive and lasting solutions to problems caused by ASB through close partnership working with statutory or external service providers.
2.9	PCHA will record and monitor all actions taken to deal with or prevent ASB and ensure this is updated accordingly. PCHA will work with customer representatives, victims and partners to continually evaluate the effectiveness of measures taken and will use this information to develop service standards, ensure appropriate resources are always available and set challenging targets for constant improvement.
2.10	When evaluating ASB, PCHA will work with resident representatives through the Customer Empowerment Panel to consider the strategic fit with its wider tenancy management, neighbourhood management and investment priority setting services and initiatives.
2.11	PCHA will monitor and publish the performance and satisfaction with ASB services on a quarterly basis and will benchmark against other comparable organisations aiming to be within the top 25% across all measures including value for money.
2.12	PCHA will ensure all of its front-line staff that have responsibility for dealing with ASB are appropriately trained, are aware of the full range of legal measures that are available to them and will consistently use the most appropriate measures to address the concerns raised.
2.13	PCHA is committed to publicising the results of major ASB and harassment interventions to provide reassurance to customers that it takes swift and decisive actions on these issues and to deter others from engaging in these types of behaviours. Such decisions are made on a case-by-case basis to ensure compliance with relevant legislation and that publicity is reasonable and corresponds to the circumstances.

3	Policy
3.1	Through consultation exercises, PCHA customers have consistently identified the provisions available to deal with ASB as being a priority for them. In response to this feedback, PCHA have invested significantly in the staff resources, systems and number of interventions it employs to tackle these problems.
3.2	<b>Determining Priority Responses</b>
3.2.1	PCHA operates a 24 hour system that is available 365 days a year for reporting ASB issues. In order to make the best use of resources and to enable a rapid response where required in the most serious of cases, PCHA operates a form of 'triage' for determining who within PCHA is best placed to respond.
3.2.2	<p>Requests for assistance that are received directly from PCHA customers or others acting on their behalf are assessed at the point of contact. Those that are classed as being 'high level' and at greatest risk are passed to the PCHA's Community Safety Team, including:</p> <ul style="list-style-type: none"> <li>• Any ASB cases where violence or threats of violence have been made and a danger to individuals remains</li> <li>• Where targeted damage to property has been involved</li> <li>• All domestic abuse cases and reports of hate crime or harassment (see PCHA Domestic Abuse / Hate Crime and Harassment Policies for details)</li> </ul>
3.2.3	All other cases are passed to the relevant Neighbourhood Services Officers (NSOs) who will support customers and agree action plans to find an effective resolution.
3.2.4	In all cases of ASB, PCHA will aim respond directly to those making reports within one working day and will carry out a detailed interview (in most cases via telephone contact) within 5 working days, if convenient.
3.2.5	At the initial meeting / interview the NSO will offer to complete a risk assessment and agree a plan of action with the customer. This will be carried out for all cases including those for employees and Third-party partners. This will set out what steps each party will take to address the issues raised.
3.3	<b>PCHA Approach to Investigation</b>
3.3.1	<p>PCHA have provided specialist training for all staff that have responsibility for investigating and responding to reports of ASB issues. The training has reinforced PCHA's commitments to ensure:</p> <ul style="list-style-type: none"> <li>• Staff are confident in dealing with ASB, they are aware of the measures that can be used, and they know when to make referrals internally or to external agencies</li> <li>• Each case is reviewed on its merits and services are tailored to meet the needs of the individual, including being aware of cultural requirements and providing responses in appropriate formats</li> <li>• The needs of victims are of primary concern, they are dealt with sensitively and that confidentiality is respected at all times, including making referrals to Victim Support services and other support agencies, where required</li> </ul>

- Where contactable, those reporting incidents are kept up-to-date of actions being taken and have clear lines of communication with investigating officers and any partner agencies involved
- Realistic timescales are provided for bringing about resolutions and customers' expectations are managed
- Advice is provided to customers on how they can protect themselves and do everything possible to avoid situations escalating
- Where required 'case conferencing' approaches are employed involving internal teams and external agencies, as necessary
- Any interviews with perpetrators or those responsible for behaviour that gives rise to concerns are conducted separately to any contact with victims
- PCHA staff know how to recognise adult, and children safeguarding concerns and take appropriate action

### 3.4 **PCHA Approach to Evidence Gathering and Record Keeping**

3.4.1 PCHA have established a track record for delivering successful outcomes in ASB cases by ensuring all actions are backed by a sound evidence base.

3.4.2 After carrying out an initial risk assessment to understand any risks, PCHA provides customers with advice on the best ways to avoid any further incidents with perpetrators and to gather essential evidence to justify any necessary enforcement actions. This may include use of:

- ASB Incident Diaries – where customers can record all details giving rise to concerns, including how behaviour or incidents affect the way it makes them feel
- Witness Statements that can be used in court cases
- CCTV recording equipment

3.4.3 PCHA may also make use of 'Community Harm Statements' to be submitted alongside applications to court for enforcement actions providing a summary of the case, background information, a profile of the wider community, the harm that the incidents or behaviours have caused and the impact this has had on local resources, where applicable.

### 3.5 **Malicious or Unfounded Reporting of ASB**

3.5.1 Where PCHA receives reports of ASB from identifiable individuals that are PCHA customers of a serious or repeated nature, that on investigation are found to be baseless or made with malicious intent it will class this as a form of ASB in itself and may issue warnings or take tenancy enforcement actions, as appropriate.

### 3.6 **Measures PCHA use to tackle ASB**

3.6.1 PCHA will ensure all actions taken to address ASB are reasonable and proportionate at all times. Where possible, PCHA will use prevention, early intervention and diversionary measures to tackle issues before they escalate and if appropriate give opportunities for perpetrators to amend their behaviour.

3.6.2 Where cases are of a serious nature when they are reported to PCHA, actions taken to bring about resolution may occur without notice of the alleged perpetrator such as 'without-notice injunctions'. PCHA has a discretion to apply for such an order where there is actual or threatened violence or where it is reasonably believed that there is a risk of harm to the victim.

3.6.3	Each case of ASB will be assessed individually for the most appropriate response, however, through the use of case management systems those of a similar nature will elicit a consistent response.
3.6.4	<p>After PCHA have conducted thorough investigations of reports and established the facts of a case and where appropriate, a graded approach will be taken to enforcement action which may include:</p> <ul style="list-style-type: none"> <li> <b>Investigation and Interview with Perpetrators</b>  Relevant to cases of ASB and harassment – PCHA investigating officers will establish the facts of the case and will aim to interview those alleged to be responsible for the cause of concern (if known) </li> <li> <b>Issue of Yellow Warning Cards</b>  If following the above, the investigating officer determines responsibility they may issue a yellow warning card (if the perpetrator is an PCHA tenant). This will serve as a first level warning and will state that they could be in danger of losing their tenancy if the behaviour persists and will advise them as to their expected future conduct. A written note of the warning will be forwarded to the tenant and a copy kept on the internal case management system </li> <li> <b>Issue of Red Warning Cards</b>  If there is no improvement or new incidents are reported a red warning card may be issued. This may serve as a final warning before legal action is commenced. Red card warnings may also be issued if the behaviour is of serious nature. (without the need to receive a yellow warning). Examples of this may include actual or threatened violence or conduct, which PCHA may reasonably deem to be harassment or abuse. Harassment, abuse or aggression towards PCHA staff or its representatives will, in most cases result in a red card warning as a minimum, with records retained on the case monitoring system  If the perpetrators are not PCHA tenants written warnings may still be issued that PCHA will pursue civil actions and contact may be made with their landlord (if they have one) and the Local Authority’s Anti-Social Behaviour Team </li> <li> <b>Restorative Justice Practice</b>  Relevant to ASB and harassment - PCHA may use Restorative Justice Practice, which gives victims a say in the punishment of their offenders whilst seeking to help an offender understand the wrong they have done and make amends. In such cases victims will take an active role in the process and at the same time offenders are encouraged to take responsibility for their actions. PCHA will use the Restorative Justice Practice in low-level risk incidents of anti-social behavior and each case will be assessed on its merits </li> <li> <b>Community Justice Panels</b>  PCHA may refer the case to the Community Justice Panel (CJP) for the relevant area. These operate on the principles of ‘restorative justice’ with an agreed outcome. Participation in CJP’s is voluntary however and where refused PCHA may consider alternative resolutions to disputes </li> <li> <b>Mediation</b>  PCHA investigating officers or suitable external partner organisations may act as an intermediary between two or more parties (one of which must be an PCHA customer) that have an on-going disagreement to seek a joint resolution </li> <li> <b>Acceptable Behaviour Contracts</b>  PCHA will issue a formal written agreement, specific to circumstances, to PCHA tenants or their household members (usually involving parents or guardians and their children) </li> </ul>



agreeing not to take part in certain behaviours (for example harassment, alarm, nuisance and distress). Normally lasting for a period of 6 months (but can be extended if necessary) the contract will outline the consequences for the individual and the household if it is broken

- **External Agency-Projects and Support-**

PCHA may refer individuals with their consent to external agencies for further support, or specific projects which may be helpful in reducing incidents of anti-social behaviour

- PCHA may apply for '**Parenting Contracts**' – which is a voluntary agreement between PCHA or other agencies and the family, developing tailored support packages and agreements to amend behaviour with clear consequences for any breaches

- PCHA may apply for '**Parenting Orders**' – upon breach of a 'Parenting Contract' which makes the requirements compulsory

- **Demotion Orders**

PCHA have the power to apply to court to demote 'Assured Tenancies' which are not for a fixed period to 'Starter tenancies' which are usually for a twelve-month period only, effectively making the tenancy less secure and easier for PCHA to seek outright possession if required

- **Injunctions**

PCHA can apply for injunctions against the perpetrators of ASB to prevent nuisance and annoyance including where the perpetrator has allowed another person to engage in ASB. This includes those aged under 18s (anyone aged 10 years or over)

- Where PCHA intend to apply for injunctions against under 18s, PCHA will consult with the local Youth Offending Team and other relevant bodies before the application is made
- PCHA may apply for court injunctions where it believes the conduct is capable of causing nuisance or annoyance to a person in relation to that person's occupation of an PCHA property or the conduct is capable of causing housing related nuisance or annoyance. PCHA will exercise its powers when it believes that an injunction is necessary to prevent further incidents of ASB
- In extreme cases of use or threat of violence or significant risk of harm, PCHA have the right to apply for:
  - Interim injunctions – these are injunctions obtained without giving notice to the intended recipients (can contain only prohibitions, not requirements to participate in specified activities)
  - Injunctions that contain powers of arrest for breach (this is subject to the court determining that the conduct that is the reason for complaint includes use of threat or violence or there is significant risk of harm to others)
  - Injunction that includes clauses excluding an offender (over 18s) from a home or any premises or area (subject to the court being of the opinion that the conduct includes use of threat or violence and there is a significant harm to others)
  - Injunctions that place a positive requirement on the defendant i.e. compulsory attendance at a course that intends to help the person change their behaviour
- Where there are reasonable grounds to believe prohibitions contained within an injunction have been breached, the court could order the following penalties:
  - Over 18s: civil contempt of court with unlimited fine or up to two years in prison
  - Under 18s: suspension order or, as a very last resort, a civil detention order of up to three months for 14-17 years olds

3.7	<b>Possession Orders</b>
3.7.1.1	PCHA may apply to the courts for possession of (PCHA) properties where there have been serious and / or persistent incidents and usually when other attempts have failed to bring about an appropriate change in behaviour. When considering a claim for possession, PCHA may take into account the conduct of the whole tenancy.
3.7.2	<b>Absolute Ground for possession</b>
3.7.2.1	If necessary, PCHA will apply for possession of assured tenancies where anti-social behaviour or criminal offence has already been proven at court. Offence or breach is required to have occurred in the locality of the property or affected a person with a right to live in the locality or affected PCHA or PCHA's staff or contractors
3.7.2.2	<p>The court must grant possession provided the following conditions have been met:</p> <ul style="list-style-type: none"> <li>• The tenant, member of the household, or a person visiting the property has been convicted of a serious offence</li> <li>• The tenant, a member of tenant's household, or a person visiting the property has been found by court to have breached a civil injunction</li> <li>• The tenant, a member of tenant's household, or a person visiting the property has been convicted for breaching a Criminal Behaviour Order (CBO)</li> <li>• The tenant, a member of tenant's household, or a person visiting the property has been convicted for breaching a noise abatement order or notice</li> <li>• The tenant's property has been closed for more than 48 hours under closure order for anti-social behaviour</li> </ul>
3.8	<b>Right to Appeal</b>
3.8.1	Customers can request a review of PCHA's decision to seek possession under the absolute ground for possession. The appeal should be made in writing within seven days of the notice to seek possession being served on the tenant.
3.8.2	PCHA will acknowledge receipt of the appeal in writing within 3 working days and arrange for the decision to be reviewed by a panel comprised of a more senior officer than the one who made the original decision and an alternative officer. The panel may seek legal advice in relation to the case, but the legal advisor will not play an active role in the review hearing.
3.8.3	Customers may make representation by way of written submission or choose to attend panel hearings in person (or these meetings may be facilitated via remote means), where they may be accompanied by a person of their choice (including legal representation).
3.8.4	If customers choose to attend the panel hearing, they should submit copies to PCHA of any evidence they intend to use at the hearing (written and photographic evidence) 48 hours in advance of the meeting. They should also advise the name and capacity of any person that will be attending the hearing with them.
3.8.5	PCHA will communicate the outcome of the review to the tenant in writing before the end of the notice. For further details refer to the PCHA Complaints, Appeals and Feedback Policy.

3.9	<b>Partnership Working and Information Sharing</b>
3.9.1	<p>PCHA is committed to working closely with partner agencies when providing a comprehensive response to ASB issues. The advantages to be gained from this approach include:</p> <ul style="list-style-type: none"> <li>• A better and quicker service for customers and victims, providing lasting solutions that get to the root cause of problems</li> <li>• Pooled resources, preventing duplication of actions and providing value for money</li> <li>• Takes into consideration the needs of wider communities beyond PCHA tenants and properties</li> </ul>
3.9.2	<p>In line with this approach, PCHA have established excellent working relations with a number of local agencies including but not exclusive of:</p> <ul style="list-style-type: none"> <li>• The Police and other statutory service providers</li> <li>• All Local Authority departments</li> <li>• Other landlords</li> <li>• Specialist care providers, advocacy and support groups</li> <li>• Community groups</li> </ul>
3.9.3	<p>PCHA demonstrates its partnership approach to tackling ASB through the lead role it plays in the following groups:</p> <ul style="list-style-type: none"> <li>• <b>Regular Meetings with Police</b></li> <li>• Identifying local crime hotspots, reviewing progress in active ASB cases, planning for early intervention and diversionary activities and cross-referencing criminal damage cases reported on PCHA properties to identify if additional support is required or if recharges for damages should be issued</li> <li>• <b>Vulnerable Victims Meetings</b></li> <li>• Using a shared 'Risk Assessment Matrix' – which provides clear criteria to assess the extent to which a vulnerable reporter / victim / witness is at risk of experiencing harm, PCHA will work with multiple agencies to provide support packages to those most in need – which may include regular visits from PCHA staff or target hardening measures</li> <li>• <b>Multi-Agency Responses</b></li> <li>• PCHA will collaborate with local ASB strategic bodies (established in areas it owns and manages properties) to discuss responses to anti-social behaviour problems, share data and intelligence and set priorities for action based on agency concerns and those of their customers</li> <li>• Where required, PCHA will cooperate with the ASB Case Reviews set up by relevant bodies operating in the areas where it owns or manages properties as stated in the Anti-Social Behaviour, Crime and Policing Act, 2014</li> <li>• <b>Attendance at Best Practice Groups</b></li> <li>• To share its best practice in ASB and to learn from other providers PCHA will regularly attend best practice forums</li> </ul>
3.9.4	<p>When working with partner organisations to provide joined-up services, PCHA will need to share information it holds about those involved in ASB. In all cases this will be in accordance with strict 'data sharing protocols' that have been developed with the main partner agencies.</p>

3.9.5	The protocols ensure compliance with the UK Data Protection Act 2018 and the UK General Data Protection Regulations 2018 requirements in that personal information will not be disclosed to third party organisations unless it is in 'the best interests of individuals concerned'. PCHA will also ensure the systems it has for data storage are robust and secure at all times.
3.10	<b>Staff and Contractor Protection</b>
3.10.1	Sections 3.1 - 3.6 set out the provisions PCHA has in place to tackle ASB that is caused by or directed to PCHA tenants and customers. In operating the Policy, PCHA also aims to ensure that its staff or others working on its behalf are not subject to ASB or harassment from PCHA customers, their friends, relatives, or others who may be visiting their PCHA home and neighbourhood. For further details refer to the PCHA Unacceptable Behaviour Policy.
3.10.2	In line with its internal 'Grievance, Bullying and Harassment Policy', PCHA takes a zero-tolerance approach to this type of behaviour directed towards its staff and contractors and will consider taking tenancy or civil actions against any individuals or groups that are found to be responsible.
3.11	<b>Satisfaction and Complaints</b>
3.11.1	PCHA constantly strives to improve the services it provides to tackle ASB to meet the needs of customers, victims and witnesses. For every case that is investigated by PCHA or where actions are taken, PCHA will survey customers to assess their satisfaction with way the case was handled and the outcomes achieved. PCHA will also take appropriate action where customers express dissatisfaction to improve the services provided.
3.11.2	PCHA will use this feedback to review the services it provides, in conjunction with customer representatives, to ensure it is adequately resourced and to drive service improvements. PCHA will also benchmark its services against other providers in the housing sector and will look to maintain performance in the top 25% at all times.
3.11.3	Where services do not meet expectations in any way, customers are encouraged to use PCHA's complaints process to express their dissatisfaction and to seek resolutions to problems. PCHA will acknowledge all complaints within 5 working days and will look to get a full response to complainants within 10 working days. PCHA will also analyse complaints as a means of identifying areas for improvement.
3.11.4	Where the ASB Case Review has been activated, PCHA will work in partnership with the relevant agencies to find a solution including sharing information and assessing risk of harm to the victim of the anti-social behaviour.
<b>4</b>	<b>Implementation</b>
4.1	All staff have a responsibility to be aware of the Anti-Social Behaviour Policy to be able to direct any customer enquiries that may arise.
4.2	Neighbourhood Services Officers for general needs and supported housing accommodation have responsibility for carrying out investigations to reports raised for low to medium level ASB (in accordance with the provisions outlined in 3.3. and 3.4 above).

4.3	The Community Safety Team have responsibility for investigating all high-level cases. The Community Safety Team will also be responsible for preparing legal documents for court action in high level cases and carrying out any strategic review of services.	
<b>5</b>	<b>Performance</b>	
5.1	<p>In conjunction with PCHA's involved resident structures, ASB performance reporting is provided to the following forums and timescales:</p> <ul style="list-style-type: none"> <li>Quarterly Housing &amp; Support Services report for the Service Review Group (SRG), this includes: <ul style="list-style-type: none"> <li>Top level summary of ASB Team performance</li> <li>ASB survey responses</li> <li>Summary of complaints made against ASB Team</li> <li>Commentary on any Community Safety Team KPI's which did not hit target within the quarter</li> </ul> </li> <li>Quarterly PCHA KPI Board Report, this includes: <ul style="list-style-type: none"> <li>% Satisfaction with ASB case handling along with quarterly comments</li> <li>Tenant Satisfaction Measurement reporting (including relevant measures relating to ASB)</li> </ul> </li> <li>Quarterly Customer Care Charter – update for Board, also uploaded to PCHA website, this includes; <ul style="list-style-type: none"> <li>Overall satisfaction with services</li> <li>% of ASB cases responded to within 24 hours</li> </ul> </li> <li>Summary of ASB survey responses is reported on the PCHA website monthly</li> <li>Satisfaction with ASB case handling is reported in the Annual Report</li> </ul>	
5.2	In addition to the above, PCHA will also externally benchmark performance with peer providers and will aim to maintain top quartile performance across all indicators.	
<b>6</b>	<b>Consultation</b>	
6.1	All PCHA staff have been consulted in the development of this Policy. Tenants' representatives were consulted in the Policy development via the Customer Empowerment Panel.	
<b>7</b>	<b>Review</b>	
7.1	The Policy will be reviewed every Three years from the date of Departmental Management Team (DMT) approval (or as near as possible) or more frequently if required by changes in legislation, regulation or as a result of system audits.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	An EIA Relevance Test was conducted by the Strategic Regulatory Compliance Manager and the Quality and Inclusion Officer in October 2024.

8.3	Results of EIA	The measures PCHA currently has in place to ensure all reports of ASB are dealt with promptly, proportionately and consistently are sufficient to mitigate any risks of a differential or adverse service to any groups with protected characteristics. The EIA contains recommendations for: <ul style="list-style-type: none"><li>• PCHA to continue to work with partner agencies and statutory agencies to identify any real or perceived barriers that might prevent ‘reporting’ of issues by certain groups</li><li>• PCHA to continue to monitor reporting of ASB against known profile information for any trend analysis or development of mitigation measures</li><li>• ASB training to include awareness of when victims / reporters of ASB may be vulnerable in any way as a result of their protected characteristics and to tailor services accordingly</li></ul>	
9	Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	DMT	
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Operations Director- Housing Services	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director- Housing Services	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
28 January 2022	Changes in line with operational practices	See Section 6	<ul style="list-style-type: none"><li>• The Anti-Social Behaviour Policy has been separated from the Anti-Social Behaviour, Domestic Abuse and Harassment Policy</li><li>• Insertion of new clause at 3.5 on Malicious and Unfounded reporting of ASB – resulting in revised numbering from this point onwards</li></ul>

26 June 2023	In line with Review Schedule	See Section 6	<ul style="list-style-type: none"> <li>• In line with Board approved process the review schedule has been increased to every three years</li> <li>• An updated EIA Relevance Test has been undertaken</li> </ul>
11 <sup>th</sup> February 2025	In line with Review Schedule	See Section 6	<ul style="list-style-type: none"> <li>• Team names updated throughout</li> <li>• Equality, Diversity and Human Rights statement updated</li> <li>• EIA information updated in section 8</li> </ul>