



homes, communities, cultures

# Anti-Social Behaviour Policy

Version #:	Date:	Summary of Changes
Version 5		
Version 4		
Version 3		
Version 2	October 2006	Reflects the definition of racial harassment recommended in the Lawrence Report
Version 1	February 2006	

A charitable housing association



# Our Policy on the Management of Anti-Social Behaviour



homes, communities, cultures

## Introduction

Under the terms of section 12 of the Anti-Social Behaviour Act 2003, all Registered Social Landlords (Housing Associations) have a duty to publish statements of our policy and procedures on the management of anti-social behaviour and a summary of those policies and procedures. This statement gives details of our policies relating to the management of anti-social behaviour. For details of our procedures in relation to this area, please refer to the paper ***"Our Procedure on the Management of Anti-Social Behaviour"***. The summary of relevant extracts of this policy and the associated procedures can be found in our service statement leaflet ***"Harassment, Racial Harassment and Anti-Social Behaviour"***. For the purposes of this statement the term anti-social behaviour should also be taken to include nuisance, general harassment and harassment that is based on the grounds of racial origin, skin colour, sexuality or disability.

Our policy, procedures and summary statement have been developed in consultation with tenants and will be reviewed annually by our Anti-Social Behaviour Strategy Implementation Working Group (the ASBIG). This is a group of tenants, staff and Board members who meet quarterly to oversee the implementation of our policies and procedures as they relate to the management of anti-social behaviour. A summary of the annual review will be presented to our Board of management when they receive their annual review of anti-social behaviour. Any changes to the policy, procedures or summary that are recommended by the ASBIG will be recommended to the Board at that time and considered by them.

## How We Define Anti-Social Behaviour

We use the following definition of anti-social behaviour:

*Nuisance and anti-social behaviour is a general term to describe behaviour that unreasonably interferes with other peoples' use and enjoyment of their home.*

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Our service statement contains a separate definition of general harassment which we describe as:

*Verbal or physical behaviour that intimidates, dominates, harms or causes alarm and distress to an individual, a family or a group of people, which may include infringing their rights to personal safety.*

The service statement also contains a definition of harassment that is based on racial or ethnic origin, sexuality or disability. We define this as:

*Harassment which is, and/or the victim believes to be, motivated by race, skin colour, cultural identity, religious belief, sexuality or a disability.*

We manage complaints and reports of harassment that is based on racial or ethnic origin, sexuality or disability under the terms of our overall policy and procedures for the management of anti-social behaviour. However, we recognise that these types of harassment may escalate faster than other types, may have been unreported for longer (because complainants were unsure about who they could report the problems to) and may have a much more significant impact upon the complainant that, for example, complaints of noise nuisance. For these reasons we will:

- Ensure that we contact complainants who report such matters to us within 1 working day of our receiving their report.
- Act as a Hate Incident Reporting Centre where complainants can report such incidents to us (even if they and the perpetrators are not our tenants) and be given advice about other agencies that may also be able to help and support them.
- Publicise regularly our approach to such forms of harassment to encourage complainants to report cases to us.

### **Examples of Behaviour that may be considered anti-social**

Connect Residents' Association (a group of Connect Housing Tenants that is entirely independent of the Association) has considered the definition of reasonable behaviour in relation to anti-social behaviour. Below are examples of what they felt that 'reasonable' people were likely to find acceptable and unacceptable. It is not an exhaustive list and not every type of activity there will require the intervention of the Association.

	<b>Reasonable</b>	<b>Unreasonable: Nuisance/ASB</b>
<b>Noise</b>	<ul style="list-style-type: none"> <li>▪ To have occasional parties – preferably having advised neighbours first</li> <li>▪ Speak to neighbours if noise is a problem</li> <li>▪ Be aware of household noise e.g. slamming doors</li> <li>▪ Take responsibility for car &amp; house alarms</li> </ul>	<ul style="list-style-type: none"> <li>▪ All night, frequent parties</li> <li>▪ To play loud music which can be heard by neighbours in their homes</li> <li>▪ Noisy DIY before 9 am and after 7 pm</li> <li>▪ Shouting, screaming</li> <li>▪ Frequent false alarms</li> </ul>
<b>Conduct in the home</b>	<ul style="list-style-type: none"> <li>▪ Not allow what happens in the home to encroach on the neighbours</li> <li>▪ Take responsibility for visitors</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sublet or overcrowd the property</li> <li>▪ Let visitors roam the estate, harass neighbours, cause damage, noise or nuisance</li> </ul>
<b>Criminal Activity</b>	<ul style="list-style-type: none"> <li>▪ NONE!!!!</li> </ul>	<ul style="list-style-type: none"> <li>▪ Any!!!</li> </ul>
<b>Conduct regarding your own and others' property</b>	<ul style="list-style-type: none"> <li>▪ Keep clean, tidy &amp; presentable</li> <li>▪ Put large items of rubbish out for up to 1 week for collection by LCC</li> <li>▪ Encourage children not to drop litter</li> <li>▪ Repair broken windows.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Damage or threats to damage property – doors, windows and fences</li> <li>▪ Graffiti</li> <li>▪ Rubbish, excrement, eggs, paint through letterboxes and windows</li> <li>▪ Damage to cars</li> <li>▪ Overgrown gardens</li> <li>▪ Dumping household rubbish</li> </ul>

	<b>Reasonable</b>	<b>Unreasonable: Nuisance/ASB</b>
<b>Approach to neighbours and the community</b>	<ul style="list-style-type: none"> <li>▪ Approach neighbours first if a problem with any behaviour of them or children, visitors</li> <li>▪ Be considerate and respectful</li> </ul>	<ul style="list-style-type: none"> <li>▪ Abusive correspondence, remarks</li> <li>▪ Demanding money</li> <li>▪ Intimidatory behaviour from gangs or neighbours through a mixture of unpleasant actions, creating fear of retaliation</li> <li>▪ Unfounded allegations to police and social services</li> <li>▪ Abusive response when behaviour challenged</li> <li>▪ Racial harassment or homophobic behaviour</li> </ul>
<b>Pets</b>	<ul style="list-style-type: none"> <li>▪ To have up to 2 dogs or cats with RHA's permission.</li> <li>▪ To care for pets &amp; keep pets under control and not allow it to foul public areas.</li> <li>▪ To clean up after pets</li> <li>▪ Keep within own property &amp; garden or walk on a lead.</li> </ul>	<ul style="list-style-type: none"> <li>▪ To allow dogs to bark constantly</li> <li>▪ To allow dogs to roam the streets</li> <li>▪ To allow dogs to foul Public areas.</li> <li>▪ Setting dogs on someone</li> <li>▪ Keep pets in poor conditions</li> </ul>

	<b>Reasonable</b>	<b>Unreasonable: Nuisance/ASB</b>
<b>Children and young people</b>	<ul style="list-style-type: none"> <li>▪ Play in designated area</li> <li>▪ Under 14 to play until 9pm</li> <li>▪ From 15 to 20 years old, to behave respectfully in the street and go indoors after 11pm</li> </ul>	<ul style="list-style-type: none"> <li>▪ Play on roads</li> <li>▪ Shouting &amp; screaming</li> <li>▪ Drinking &amp; drug taking</li> <li>▪ Littering</li> <li>▪ Play ball games in the street</li> <li>▪ Verbal obscenities</li> <li>▪ Damage &amp; graffiti</li> <li>▪ Under 14 to play after 9 pm</li> <li>▪ From 15 to 20 years old, to group and chat in the street from 11 pm</li> <li>▪ Parents using children to retaliate</li> <li>▪ Bullying of children</li> <li>▪ Playing on other people's property</li> </ul>
<b>Vehicles</b>	<ul style="list-style-type: none"> <li>▪ Cleaning and minor maintenance of cars</li> <li>▪ Keep a legal car on own drive</li> <li>▪ Ensure visitors park sensibly</li> <li>▪ Drive with consideration to others</li> </ul>	<ul style="list-style-type: none"> <li>▪ To rev car engines</li> <li>▪ Leaving engines running</li> <li>▪ Blocking streets by inconsiderate parking</li> <li>▪ Run a garage or cleaning business from home</li> <li>▪ Slam doors, beep horns, blast car radios after 9 pm to 8 am</li> <li>▪ Speeding</li> <li>▪ Abandoning vehicles in the street.</li> <li>▪ Parking on grassed areas</li> </ul>

## **Our Approach to Anti-Social Behaviour**

The Association will not tolerate any form of anti-social behaviour and harassment. We will act quickly on all allegations and deal sympathetically with complainants. Our aim is to ensure that our tenants can enjoy their homes in peace and that the communities in which we work are not blighted by anti-social behaviour where it is in our power (either through acting alone or in partnership with other agencies) to prevent this. Our goal is to stop anti-social behaviour where this is possible. It

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is not to evict the perpetrator unless there are no other appropriate options. Amicable resolution rather than escalating confrontation is key to this policy.

All reports of anti-social behaviour and harassment will be documented and acted upon in accordance with our anti-social behaviour procedures which are available separately on request.

## **How we can Help People who are Subjected to Anti-Social Behaviour**

We aim to provide a flexible and appropriate approach to the management of anti-social behaviour through a variety of means. These include our own resources (our staff, our equipment, our knowledge etc) and our partnerships with other agencies (including agencies like the Police, the Leeds Racial Harassment Project, the Anti-Social Behaviour Unit, the Environmental Health Department etc).

Our objective is to ensure that we meet our obligations to deal effectively with anti-social behaviour and harassment, adopt the best of current good practice with regard to managing anti-social behaviour and harassment and respond promptly and consistently to reports of anti-social behaviour and harassment.

Our policy and procedures about the management of anti-social behaviour are only one part of a wider organisational strategy which aims to build sustainable communities in which people will want to live. Other elements of that wider strategy include our policies on the allocation of homes, the management of complaints, the use of introductory tenancies for new tenants and our strategies that relate to children, tenant participation, services to people from black and minority ethnic groups etc.

To ensure that we can offer a flexible approach to the management of anti-social behaviour, we ensure that the services offered by our Neighbourhood Housing Team (in the investigation and management of complaints) are supplemented by services from a variety of other teams within and outside the organisation. Those offered from other teams within the organisation include additional support from our own Housing Support Workers (both for complainants and perpetrators), up to date information on the progress of a case and quick access to advice from our team of Housing Services Advisors and the opportunity to comment upon and influence the shape of services and the way they are delivered from our Tenant Participation Team.

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More detailed information about the specific ways in which we can help people who are affected by anti-social behaviour can be found in our statement of procedures, available separately.

## **The Legal Context of our Policy on Anti-Social Behaviour**

Registered Social Landlords (Housing Associations) are governed and regulated by a wide range of legislation and guidance. Our policy on antisocial behaviour has existed for some years but has been published in this form in response to the provisions of the Anti-Social Behaviour Act 2003 (specifically part 2 of that act, that deals particularly with social housing). In addition to this Act, we aim to ensure that our approach to anti-social behaviour meets the requirements of a number of other Acts or types of guidance. These include (but are not limited to):

- The Housing Act 1988 (and specifically the obligations of our tenancy agreement imposed upon both the Association and our tenants).
- Section 71 of the Race Relations Act 1976 (particularly in the way it deals with the elimination of unlawful racial discrimination and the promotion of equality of opportunity and good relations between people from different racial groups).
- The Disability Discrimination Act 1995.
- Articles 6, 8 and 14 of the Human Rights Act 1998.
- The Regulatory Code of the Housing Corporation (our regulatory body).

## **What are the Standards of Behaviour Expected of Tenants and their Households?**

All our tenants will have signed tenancy agreements which set out the rights and responsibilities of them as tenants and us as the landlord. The tenancy agreement makes clear that obligations placed upon them in respect of nuisance, harassment and anti-social behaviour, include obligations to ensure that neither their household or their visitors commit any acts that could infringe the terms of their tenancy agreement in this area (and in a number of others). The Association uses a number of different types of tenancy agreement and so the wording and numbering of the sections that relate to anti-social behaviour will differ under each type of agreement. However, the following extracts give examples from the most recent revision of our tenancy agreement and outline the responsibilities of tenants in relation to any form of anti-social behaviour:

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### ***Nuisance and antisocial behaviour***

You are responsible for your actions and the actions of your family, anyone living with you and your, and your family's visitors

*To ensure you or anyone living with you or your visitors do not engage in or threaten to engage in conduct which is capable of causing nuisance or annoyance to any person who:-*

- has a right to reside in or occupy housing accommodation owned or managed by us; or
- has a right to reside in or occupy other housing accommodation in the neighbourhood of housing accommodation owned or managed by us; or
- is engaged in a lawful activity in or in the neighbourhood of housing accommodation owned or managed by us; or
- is employed in connection with the exercise of our housing management function, whether employed by us or not.

*Examples of what you and people living with or visiting you must not do, cause, commit or allow include (but are not limited to):*

- harassment on any grounds;
- the use or threat of violence;
- racist language or behaviour;
- abusive or insulting words or behaviour;
- damaging or threatening to damage property belonging to another person or their home;
- writing graffiti;
- behaving in an offensive or irritating manner (particularly when under the influence of intoxicating substances);
- persistently making excessive noise which can be heard outside your home including arguing, door slamming and loud music;
- using or allowing your home to be used for prostitution, dealing in or the use of any illegal drugs;
- any nuisance or annoyance caused by pets including persistent barking and fouling; and
- dumping rubbish at your home or in the locality.

*Not to keep or use or allow anyone living with you or your visitors to keep or use any illegal drugs in your home or in the locality. We consider it to be a serious*

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breach of your tenancy if you use illegal drugs, harass people or cause a nuisance. You would be at risk of losing your home if you break these conditions.

### ***Racial and other harassment***

*Not to cause, commit or allow anyone living with or visiting you to commit any harassment which is or is likely to interfere with anybody's peace and comfort or cause them offence. This includes (but is not limited to) harassment on the grounds of colour, race, sex, sexual orientation, age, gender, religious belief, culture, ability, physical or mental disability or lifestyle.*

### ***Staff harassment***

*Not to threaten, intimidate, harass, cause alarm or distress or carry out any violent act, and ensure that no-one living with or visiting you does so, against any of our employees, agents or contractors, either when visiting you at your home or in any of our offices or anywhere else.*

### ***Domestic violence***

*Not to harass, assault, or mentally, physically or sexually abuse anyone living in your household.*

### ***Noise***

*Not to play, use or allow others to play or use in or in the locality of your home any audio equipment or musical instrument so loudly and persistently as to cause or be likely to cause a nuisance or annoyance to other tenants, members of their household, visitors or adjoining occupiers or so that it can be heard outside your home between 11.00pm and 8.00am.*

### ***Pets***

*To get written permission from us **before allowing any** animal to stay at your home.*

*We will not unreasonably refuse permission for you to have an animal staying in your home but we may withdraw permission or require you to remove an animal permanently from your home if it causes a nuisance to other people in the locality*

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*or causes damage.* We will only usually grant permission for a dog or cat if you have exclusive use of an externally opening door.

*You must keep any animals in your home under control at all times and in conditions consistent with their welfare.*

### ***Hazardous materials***

*Not to use or store in your home or any store, shed or garage any petrol, paraffin, liquid petroleum, calor gas heaters or other highly flammable materials other than usual household goods.*

In addition to the above clauses from the tenancy agreement, a sub-group of Connect Residents' Federation agreed that the following measures could also be reasonably expected from tenants:

- To approach the alleged 2nd party, or parents of 2nd party if children are involved, before approaching Connect unless under fear of violence or harassment.
- To contact the Police regarding breaches of the peace, damage to property, threatening or violent behaviour and other criminal activity.
- To contact Environmental Health regarding noise and environmental nuisance.
- To complain to Leeds City Council Housing Dept if the 2nd parties are known to be LCC tenants or the appropriate RSL if they are RSL tenants.
- To report any of the above to Connect
- To put their names to complaints i.e. anonymous complaints should not usually be acted upon.
- To consider mediation
- To keep nuisance diaries
- To be prepared to consider Neighbourhood Watch schemes and tenants groups as a means to combating anti-social behaviour

## **More Information About how we Manage Anti-Social Behaviour**

### **How we support people who complain about anti-social behaviour**

Many people who complain and/or potential witnesses in cases of anti social behaviour or harassment could be 'lost' in the course of an investigation as a result

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of fear of reprisals and intimidation – actual or perceived. To sustain effective action witnesses are essential and whilst, in some cases, evidence can appropriately be supplied by third parties, such as Housing Officers or Professional Witnesses, in others the evidence of neighbours is crucial.

We believe that the complainant and/or the witness is our key asset in building a case that will lead to an appropriate form of intervention that brings the nuisance or anti-social behaviour to an end. This form of intervention will range from warnings and neighbour agreements to legal action (including, in some cases, action to repossess the home of a perpetrator). We value our complainants and witnesses and see them as an important part of any action to be taken rather than apart from it.

We will offer the following support as appropriate:

**Support from within the Association and referral to other relevant agencies**

- Referral to our own Housing Support Team or to relevant support agencies who can offer specialist services.
- Sympathetic responses to requests for re-housing on a temporary or permanent basis where there is real or perceived risk to the victim e.g. racial harassment. Proactive support will be offered if victims want to move and there is a risk of recurrence and reprisal. (this may include practical assistance)
- Maintaining complainants' confidentiality as far as we are able to do so and explaining to them in detail when and why this may sometimes be difficult or impossible to guarantee.
- Efficient handling of cases in accordance with our procedures to enable the conclusion of the case within reasonable timescales.

**Information**

- Regular contact with staff from the Association who can keep the complainant or witness informed about the progress of the case. This includes providing clear information about which Association staff member is acting as the lead officer in the investigation and management of the case.
- Clear and realistic information about support available, the process and possible outcomes.
- Advice about options and progress in dealing with the problem.

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### **If court action is a possibility**

- Pre-court meetings for the complainant and/or witnesses with the 'team' – including the legal team. The legal/court process can be very daunting so we aim to ensure that we take time to explain what will or may happen and what the possible outcomes may be.
- Arranging visits to court for the complainant and/or any witnesses prior to the hearing if they feel that this would be helpful to them.
- We will consider obtaining "without notice" injunctions on the alleged perpetrator before court papers are served on them in cases where reprisals against complainants or witnesses are believed to be likely.
- We will provide transport and childcare support for court appearances where complainants or witnesses need this.
- We will liaise with relevant solicitors regarding witnesses who may be more willing to appear in court in a group, transported to the Court together.
- We will hold meetings of witnesses for mutual support and information exchange where they feel that this would be helpful to them.
- If possible we will use of third party evidence to avoid using neighbours/victims as witnesses

### **How we aim to Prevent Anti-Social Behaviour**

Our procedures aim to prevent anti-social behaviour where this is possible or to minimise the extent and impact of it. To those ends we operate a number of other policies that are designed to help us to prevent incidents. We also work with a number of other agencies to help us to both prevent and or minimise the extent of anti-social behaviour.

Examples of policies that are aimed at preventing such behaviour include:

- The allocations policy – this includes sections that deal with an applicants previous tenancy history which may have a bearing upon their ability to refrain from committing anti-social acts in the future.
- The use of introductory tenancies – these tenancies provide a lower level of security of tenure for new tenants during their first twelve months in their tenancy. During this period, we will assess their conduct of their tenancy and provide them with additional support to ensure that they understand their rights and obligations. If they breach the terms of their introductory tenancy, we will consider ending that tenancy.

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- The provision of dedicated Housing Support Workers who can support both complainants and perpetrators of anti-social behaviour. This support is provided with the aim of helping the tenant to maintain their tenancy (and, in the case of perpetrators, of ending the anti-social behaviour).

Examples of other measures we will take to help to prevent anti-social behaviour include:

- Considering how the design of our new housing schemes can be changed to minimise the risk of anti-social behaviour.
- Developing a Children's Strategy to encourage children and young people to become more widely and positively involved in their neighbourhood, their community and in the work of the Association.
- Supporting tenants and other groups who provide projects that divert people away from anti-social behaviour. This could include things like school holiday activity clubs or training for people who want to run groups or activities in their communities or neighbourhoods.

Examples of other agencies with which we work to help to prevent or minimise anti-social behaviour include:

- Youth Services (both statutory and voluntary).
- Leeds Mediation Service (who may mediate between individuals or groups of tenants to bring disputes to an amicable conclusion).
- Leeds City Council Neighbourhood Wardens or Anti-Social Behaviour Unit (with whom we will share information and undertake joint operations).
- Other support agencies (such as local providers of housing or other support).
- The Environmental Health Department (with whom we will co-operate in cases of noise nuisance, for example).

The above examples are by no means an exhaustive list but give a flavour of the types of strategy we will or may adopt or the variety of agencies with which we do or may work to both prevent and minimise anti-social behaviour and its effects. We also aim to use a wide variety of non-legal measures to tackle both small and larger scale incidents of anti-social behaviour. We believe that, in most cases, we should work towards ending the anti-social behaviour, rather than attempting to evict the perpetrator. There are many reasons why we believe that this is often the most appropriate aim. One of the most significant of those reasons is because we often have little control over where a perpetrator moves if they are evicted. If they

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remain within one of our homes, we often have a greater chance of influencing their future behaviour in more positive directions than might be the case if they move only a few streets away into the property of a landlord who does not have the time, resources or desire to deal with the issue in ways that the local community expects.

Examples of the non-legal measures we might consider when dealing with cases of anti-social behaviour include:

- Acceptable behaviour contracts.
- Parenting contracts.
- Mediation.
- Verbal and written warnings about the consequences of a repetition of behaviour.
- Estate agreements.
- The provision of extra support.
- The installation of noise monitoring equipment.

### **Multi-Agency Partnerships, Information Sharing Protocols and Confidentiality**

We recognise that we cannot attempt to deal with all cases of anti-social behaviour on our own and it is not appropriate that we should try to do this. We also recognise that our most important partners in dealing with the issue are our tenants and the communities in which we work. We depend on those people to report incidents to us and to provide much of the information and evidence about what is happening. We also depend upon them to work with us in identifying suitable action plans that will help to bring cases to an end.

The Association is also involved in a number of partnerships with other agencies, with whom we work to try and deal with the issue. Some of these partnerships are formal (and are covered by formal service level agreements) and others are less formal (and we may refer cases to and from each other for help, advice and co-ordinated action). The groups or agencies with whom we may co-operate include:

- The Leeds Racial Harassment Project.
- Leeds City Council Environmental Health Department.
- Leeds City Council Social Services Department.
- Leeds City Council Youth Services.

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- Mental Health and Psychiatric Services.
  - Leeds City Council Dog Warden Service.
  - Leeds City Council Anti-Social Behaviour Unit.
  - Leeds City Council Neighbourhood Warden Service.
  - West Yorkshire Police.
  - Other local landlords, including other housing associations and Arms Length Management Organisations (ALMOs).

We may share information with or request information from some or all of those organisations in the course of our work. In the earliest stages of our involvement in a case, we will discuss information sharing with a complainant (and, when we have begun to work with a perpetrator, with them) about the agencies we may need to approach (or may be approached by) for more information. We will only seek to access information on a need to know basis and will only share information we hold with other agencies on that same basis. We will ask complainants, witnesses and perpetrators to consent to the sharing of such information but will also explain to them the circumstances under which we can be compelled to release information (for example to the Police).

We appreciate that information given to us should only be passed on to individuals or agencies that have a right to receive that information and we are very sensitive to the issue of confidentiality. We recognize that, in the many cases, the complainant will be well known to the perpetrator and that, in a number of cases both sides will be seeking our help in resolving the problem. However, there will be cases where the complainant or witness is fearful of the perpetrator becoming aware who has made the complaint.

We will take great care to discuss confidentiality and any possible risks with the complainant and any witnesses. We will also explain why, in many cases it is impossible to make progress with the case without the perpetrator eventually finding out who make the complaint. We will ensure that we discuss the potential risks and benefits with complainants and witnesses, when we are discussing action plans with them. We will also ensure that we do not close the door on complainants or witnesses who chose (at any particular moment) not to take their complaint further but still wish to receive support from the Association. In such cases, we will agree an action plan with the complainant that addresses their concerns about confidentiality but also recognizes the restrictions that this may place upon our ability to address the source of the complaint on the most effective way.

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All information about reports of anti-social behaviour will be kept secure on separate case files and only authorised officers will have access to the data. Information will only be given to third parties without the tenants consent on a 'need to know' basis where there is risk to Health & Safety or we are obliged in law to release that information and are not able to contact the tenant before we do so to explain what we are obliged to release and to whom. Names and addresses of complainants will not be given to anyone, especially the perpetrator, without the permission of the complainant or witness involved.

Under the Data Protection Act, people have a right to access files (both on paper and those held on computers) relating to them. Any confidential information that has been supplied by a third party, including complainants, must be withheld. This means that there may be parts of forms and interviews that will be withheld.

### **How we Ensure that our Approach and our Staff are up to Date**

All staff who may advise complainants about anti-social behaviour will receive training that is relevant to the type of work in which they are involved. Examples of relevant training may include:

- A Neighbourhood Housing Officer (who will investigate and manage complaints) will receive a thorough induction into our policies, procedures and toolkit for dealing with anti-social behaviour, will attend in house and external courses of developments in legislation and good practice and will discuss their case management with their line manager on a regular basis to ensure that their approach is consistent with our policies and procedures and is up to date in respect of the latest developments in legislation and good practice.
- A Housing Support Worker (who may support complainants, witnesses or perpetrators) will receive a thorough induction into our policies and procedures for support planning (including the identification with clients of support needs and the development with them of appropriate strategies to address those needs), will spend time during their induction with Neighbourhood Housing Officers so that they understand the context in which they will work together to address anti-social behaviour, will be trained in the content of our service standards (including those that relate to the management of anti-social behaviour) and will discuss their case

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management regularly with their line manager to ensure that their approach provides the best possible service to clients affected by anti-social behaviour.

Other staff who may provide advice or information to complainants, witnesses or perpetrators of anti-social behaviour include Housing Services Advisors (who will usually be the first people to receive reports from complainants), duty officers (who may also receive initial reports and may be asked to provide information about how a case is progressing) or Tenant Participation staff (who may receive information when engaged in meetings of tenant groups). All these staff will receive in house training that is relevant to their role. This will include (as a minimum) training in the service standards that relate to anti-social behaviour.

### **Who can Complain to us?**

Anyone can make a complaint of anti-social behaviour to us but we recognise that we will not be able to act in all cases. In such cases, we will provide advice and information about other agencies that may be able to help.

Situations where we may not be able to provide direct help and support include:

- Reports from a person who is not our tenant (or a member of their household or a visitor) about another person or group who is also not our tenant (or a member of their household or a visitor).
- Reports from any person (whether our tenant or not) about a person occupying a home which has been purchased in part or in full from the Association. This could include reports about people living in homes which have been purchased in part or in full under the terms of low cost home ownership or do-it-yourself home ownership schemes.
- Reports from people who do not identify themselves to us when making their complaint. In such cases we will still log the complaint but may be unable to take any further action (including supporting the complainant) until the person who made the report identifies themselves to us.

### **Complaints About our Management of Cases Under the Terms of this Policy**

We aim to ensure that people who report anti-social behaviour to us are satisfied with the outcome of their case and with the way in which they have been treated by us whilst it has been ongoing. However, we recognise that there will be

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occasions when this is not the case. This could be because we have not been able to pursue the option which the complainant wanted (such as evicting the perpetrator). It could also be because we have failed to provide the relevant advice, information or support at the time when this was needed.

In cases where we have failed to meet the standards that are established in our service statement on harassment and anti-social behaviour, we recognise that complainants have the right to complain to us again about this failure in our service. In the first instance, we encourage complainants to discuss their concerns with the named officer who is dealing with their complaint of anti-social behaviour. In many cases this sort of discussion can resolve the problem and lead to a greater understanding between the staff member concerned and the complainant. However, if this approach fails to resolve the cause for concern and a complainant feels that they are still not being provided with the relevant level of service, they should make a complaint about this service failure under our general complaints policy and procedure. A copy of the leaflet that explains how this works (and also provides a copy of the form that can be used to make the complaint) is available on request from any of our offices.

Further details about our procedures for dealing with anti-social behaviour can be found in our statement of such procedures, published separately. Further details about any of the other policies or strategies we have adopted (including matters such as the allocations policy, the introductory tenancy policy and procedures, the Tenant Participation Strategy etc) are available on request from our head offices.