ANTI-SOCIAL BEHAVIOUR POLICY

AUGUST 2006

COSMOPOLITAN HOUSING ASSOCIATION

1 INTRODUCTION

1.1 The Association recognises that its tenants may suffer distress, fear and insecurity as a result of anti-social behaviour. Whilst usually caused by the anti social behaviours of a few, they can have a disproportionately adverse effect on the lives of our tenants and hinder the creation of sustainable communities.

1.2 The Association will take all reasonable steps to prevent and respond to anti-social behaviour, harassment, racial harassment, domestic violence, hate crimes and other forms of nuisance, and will at all times offer advice and assistance to tenants who allege to be the victims of anti social behaviour.

2 POLICY STATEMENT

CONTEXT

2.1 The Association has a range of legislation with which it must comply as well as powers at its disposal. This policy has been formulated with consideration and regard to legislative and regulatory requirements, as well as internal documents, as follows:

Internal

- Allocations Policy
- Equality and Diversity Strategy
- BME Action Plan
- Supported Housing Policy

External

- Anti-Social Behaviour Act 2003
- Police Reform Act 2002
- Race Relations Act 1976 and Race Relations (Amendment) Act 2002
- Crime and Disorder Act 1998 (as amended in 2002)
- Disabilities Discrimination Act 1995 and 2005
- Data Protection Act 1998
- Regulatory and Investigatory Powers Act 2000
- Human Rights Act 1998
- Protection from Harassment Act 1997
- Housing Act 1996

- Environmental Protection Act 1990 and Noise Act 1996
- Children Act 1989
- The Race Equality Scheme 2005
- The Race and Housing Inquiry Challenge Report (2001)
- The Tackling Racial Harassment: Code of practice for Social Landlords (2001)
- CRE Code of Practice on Racial Equality in Housing
- The Housing Corporation Good Practice Notes 4 & 8
- Human Rights Act 1998 (which states that failure to protect a tenant suffering from racial harassment may constitute a breach of their human rights, particularly the right of the person (Article 5) and to home and family life (Article 8)).
- The Racial and Religious Hatred Act 2006 (which will make it illegal to threaten people because of their religion, or to stir up hatred against a person because of their faith)
- The Family Law Act 1996 (which provides for two types of orders: Occupation orders concerning the right to occupy the family home; and Non-molestation orders which provide protection against violence and abuse).
- Housing Corporation Regulatory Code
- Audit Commission Key Line of Enquiry (KLOE) 31: Diversity

ASSOCIATION STANCE

2.2 Cosmopolitan condemns all forms of conduct which can be termed "anti-social" on the basis that this type of behaviour adversely affects the quality of life of those touched by it.

2.3 We are committed to preventing and tackling all such problems from any areas affected and we will use all means at our disposal to do so in a manner that is proportionate to each case. We will stress the importance of conciliation in less severe cases but recognise that ultimately prompt and severe action may be required, which may include legal action to obtain injunctions and take possession of properties. We will also fully co-operate with the Police.

2.4 The Association recognises the adverse effect and personal distress caused by anti-social behaviour on people's lives. We will therefore adopt a "victim-centred" approach that encourages our tenants to report cases of anti-social behaviour, assured that their complaints will be taken seriously and acted upon whilst they are offered appropriate support.

2.5 The Association also recognises the importance in appropriate circumstances of a multi-agency approach to tackling anti-social behaviour. The Association will therefore work with other agencies in order to identify solutions to problems. Examples of agencies with which the Association may work include:

- Local authorities
- Other Registered Social Landlords
- Tenants and residents
- Police
- Home Office
- Victim Support
- Minority ethnic groups
- Mediation services
- Specialist agencies, e.g. Race Action Net; Merseyside Racial Harassment Unit

DEFINITIONS

Anti-Social Behaviour

2.6 The statutory definition of 'Anti-Social Behaviour' is "conduct causing to another alarm, harassment or distress". This includes criminal activity, but may also include inconsiderate and selfish behaviour.

2.7 Anti-social behaviour is defined in the Housing Act 1996 as amended by Section 12 of the Anti-Social Behaviour Act 2003 as conduct which:

- is capable of causing nuisance or annoyance to any person AND

- directly or indirectly affects the Housing Management functions of a relevant landlord

  OR

- consists of, or involves using or threatening to use housing accommodation owned or managed by a relevant landlord

2.8 These people to whom conduct may cause annoyance or nuisance include anyone who has a right to live in a property owned or managed by the landlord, those living in other property in the neighbourhood (e.g. owner occupier, tenants of other landlords, and anyone else lawfully in such property) or the locality, for example working or using facilities.

2.9 The ODPM describe the Housing Management Function as any activity that the landlord would undertake in the day-to-day and strategic management of the stock. This could include:

- Resident and Community Involvement
- Maintenance and Repairs
- Rent collection, arrears prevention and pursuance
- Neighbourhood Management
- Allocations and Transfers

2.10 Anti-social behaviour can include, but is not limited to:

- Noise
- Intimidation and Harassment
- Aggressive and threatening language and behaviour
- Violence against people and property
- Hate behaviour which targets members of identified groups because of their perceived differences
- Using accommodation to sell drugs or for other unlawful purposes

2.11 When assessing reports of anti-social behaviour, the Association will consider both the severity and frequency of incidents, how they have affected victims and any other relevant factors. This could include the age and construction of the building and if the alleged perpetrator is vulnerable or has any disabilities.

Nuisance

2.12 The definition of 'nuisance' refers to behaviour that unreasonably interferes with the rights of other people to use and enjoy their home and community. It is a term with legal standing in relation to nuisance grounds for possession and statutory nuisance.

2.13 Examples of activities that may constitute nuisance would include the following:

- Playing loud music at night
- Regular dog barking
- Regular repairing of cars

Harassment and Racial Harassment

2.14 The term 'harassment' involves verbal or physical behaviour that intimidates, dominates or harms an individual, a family, or a group.

2.15 The term 'racial harassment' involves verbal or physical behaviour that intimidates, dominates or harms an individual, a family, or a group and is motivated by their race, cultural identity, or creed or the victim believes that the perpetrator was acting on such racial grounds.

2.16 This definition of 'racial harassment' is consistent with the definition of a racist incident as endorsed in the McPherson inquiry of 1999 which is 'any incident which is perceived to be racist by the victim or any other person'.

2.17 Harassment is usually intended to deliberately cause suffering. It may take many forms of threatening or aggressive behaviour, both verbal and physical, against both people and their property.

Domestic Violence

2.18 The Association defines 'domestic violence' as mental, physical, sexual, emotional, psychological or economic abuse of one person by another person who is in or has been in a relationship with them.

2.19 The relationship may be between partners, or ex-partners, or any other family members. Children involved in domestic violence may also be the victim of direct or indirect abuse.

2.20 The Association also recognises that domestic violence can be perpetrated by both men and women, and that it can also take place in same sex relationships.

"Hate Crime"

2.21 Hate crime is a broad term which may be applied to any crime where the perpetrators' prejudice against an identifiable group of people is a factor in determining who is victimised. This includes race, homophobia, disability and religious grounds.

2.22 Hate crime can take many forms including actual physical attacks to both persons or property, offensive graffiti, neighbour disputes and arson; the threat of attack – including offensive letters, abusive or obscene telephone calls, intimidation, and unfounded, malicious complaints; or verbal abuse or insults, including such things as offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes, and bullying at school or in the workplace.

ASSOCIATION APPROACH

2.23 Cosmopolitan Housing Association is committed to achieving and maintaining a peaceful and secure environment by working in partnership with residents and other agencies to create sustainable communities.

2.24 At all times we will seek to:

- Take positive steps to discourage anti-social behaviour
- Respond to any complaints in an efficient, sensitive, proportionate and consistent manner
- Offer residents support and advice

2.25 The Association will seek to respond to all reports of anti-social behaviour in accordance with the detailed operational procedures that relate to this area of activity.

2.26 The Association will seek to respond to all cases of anti-social behaviour in a proportionate manner. This means that it will aim to resolve less serious cases, where there is no danger to people or property, without recourse to legal action and stressing the importance of a conciliatory approach.

2.27 Although a conciliatory approach is preferred wherever possible, the Association will not hesitate to use legal action where it is considered appropriate in more serious cases, such as where there has been actual or threatened physical attacks or violence, or where more conciliatory methods have failed.

2.28 Underpinning the aim and objectives is a commitment throughout the organisation to deal with and support those experiencing anti-social behaviour. It is not viewed as only a Housing Management issue, but an organisational issue. As a result, in order for the Association to address the issue of anti-social behaviour, all departments have a role to play in contributing to tackling anti-social behaviour.

PREVENTION OF ANTI-SOCIAL BEHAVIOUR

2.29 The Association recognises that preventing anti-social behaviour before it occurs is as important as dealing with incidents when they arise. In order to help prevent anti-social behaviour from arising the Association will make use of a plethora of different tools and approaches, including the following:

- Make use of Assured Shorthold Tenancies in order to provide a probationary period of tenancy
- Adopt sensitive lettings and allocation strategies to avoid conflicting lifestyles wherever possible. This would include the development of Estate Strategies, designed to tackle issues such as high child density and poorly designed estates by giving priority to certain types of lettings, e.g. under-occupation, and designing out the opportunity to commit crime
- Sign up to Information Exchange protocols, in order to share information about proven perpetrators
- Undertake detailed sign-up procedures in which the Association's stance to anti-social behaviour is clearly explained
- Make available to all residents a summary of the Association's policies and procedures for dealing with anti-social behaviour
- Offer floating support to vulnerable tenants who may be unaware of how their actions are affecting their neighbours

- Publicise twice yearly in the form of a newsletter our approach to dealing with anti-social behaviour, including initiatives, agencies who can assist, and action taken against perpetrators of anti-social behaviour

- Carry out a programme of regular area inspections

- Carry out physical interventions/improvements to reduce or minimise anti-social behaviour

- Design out the opportunity to commit crime or anti-social behaviour at the development stage

- Make appropriate use of C.C.T.V. monitoring equipment

- Refer cases to mediation at an early stage to prevent problems from escalating

- Provide effective security on all empty properties to prevent instances of vandalism and other criminality

NON LEGAL ACTION

2.30 The Association will make use of a range of non-legal action to tackle less serious cases of anti-social behaviour. These include the following:

Community Agreements

2.31 These are used on estates to enhance and reinforce the terms of a tenancy. They state the level and type of behaviour which local people believe is acceptable and unacceptable behaviour. Although not legally binding they can be used further down the legal route to demonstrate reasonableness on the part of the landlord. They are often used in publicity to promote a better image for an area and reinforce the types of behaviour that a local community will not tolerate.

ABCs (Acceptable Behaviour Contracts)

2.32 An ABC is a voluntary written agreement between a young person (usually aged between 10 and 18 years), an RSL, and the Police. Under the terms of an ABC, the young person agrees not to be involved with certain anti-social acts.

2.33 The terms of an ABC are developed and agreed with the young person in an interview. The contract is signed in the presence of the young person's parents/guardians, an officer of the RSL, a Police Officer, and where appropriate, a member of the local Youth Offending Team.

2.34 The aim of an ABC is to ensure that the young person takes responsibility for their actions and becomes aware of the impact of their actions on other peoples' lives. It also sets out the possible consequences to the subject and their family, should the behaviour continue.

2.35 The priority is to stop the behaviour and to steer the perpetrators of anti-social behaviour away from such activities.

2.36 The type of behaviour included in ABCs is typically:

- Not to write graffiti or cause damage to property
- Not to start or give verbal abuse to passers-by
- Not to congregate in groups on street corners or in communal areas
- Not to dump rubbish or litter

2.37 After the contract has been signed it is crucial that it is monitored. The RSL, Police and the young person monitor progress and check compliance with the Order.

2.38 If breached, further action may be taken. This could include applying for an Anti-Social Behaviour Order (ASBO) or seeking possession of the property where the perpetrator resides. Depending on the seriousness a further meeting may be more appropriate to re-iterate the terms of the contract and decide what measure to take next.

Mediation

2.39 Mediation is a well-recognised process for resolving disagreements where a third party (the mediator) helps the parties in dispute to find a mutually acceptable resolution. It encourages people to resolve their own disputes, rather than imposing threats or legal solutions on to them.

2.40 Mediation is the Association's preferred route where informal conciliation has failed. It is recognised that it achieves the best results when cases are referred as early as possible, before levels of frustration have reached such levels that an amicable solution becomes improbable.

2.41 Mediation is based on the following principles:

- Collaborative problem solving between those in dispute to reach a situation that is acceptable to all.
- A focus on the future, emphasising re-building relationships rather than blame for what has happened in the past.
- Acknowledging feelings as well as facts, allowing participants to let go of their anger.

2.42 Mediation is a tried and tested method of dealing with disputes and is widely accepted as being successful because:

- It allows people to be heard and apologise in order to put the situation right
- It empowers people to come up with their own solutions and gives a sense of ownership to the solution

- It is less intimidating than legal action and allows people to represent themselves
- It can be organised quickly and can be completed within weeks

2.43 The Association recognises that referrals for mediation may be made even before all parties have agreed to such action, as the Mediator may be able to convince the other party to participate. It also does not have to involve all parties coming face-to-face with each other, as the Mediator may be able to go between parties in order to achieve an amicable solution that enables all parties to live alongside each other without conflict or tension. The Association recognises mediation as a tool to reduce the incidence of repeat complaints of anti-social behaviour and promote social inclusion and empowerment of individuals and communities.

LEGAL ACTION

Notice of Intention to Seek Possession (NISP)

2.44 The Association will issue tenants with a Notice of Intention to Seek Possession (NISP) when there have been any serious or repeated breaches of tenancy conditions.

2.45 The issuing of a NISP is often effective in itself in changing a person's behaviour where a person or persons are unable to accept that their behaviour is causing a problem.

2.46 A Notice of Intention to Seek Possession, once effective, lasts for a period of 1 year. It is serviced with the intention of warning the tenant that their own, any member of their family, or visitor's behaviour will not be accepted.

2.47 The Association may also, from time to time, serve Notice of Intention to Seek Possession in conjunction with taking other forms of action e.g. a Notice of Intention to Seek Possession may be served on the parent of a child signing up to an acceptable behaviour contract.

2.48 The issuing of a NISP does not automatically result in possession being granted. The Association must subsequently apply for a court hearing in which a judge would decide, based upon the evidence presented, if there is firstly a ground for possession, and secondly, if it would be 'reasonable' for the tenant to lose their home.

Anti-Social Behaviour Orders (ASBOs)

2.49 ASBOs are statutory measures that aim to protect the public from behaviour that causes or is likely to cause harassment, alarm or distress.

2.50 The Police Reform Act 2002, Section 61-66, extended the scope of the Crime and Disorder Act 1999 to give RSLs powers to apply for ASBOs in their own right.

2.51 An ASBO can be sought from the courts where a person's conduct:

- Causes harassment to the community
- Amounts to anti-social criminal conduct
- Disrupts the peaceful and quiet enjoyment of a neighbourhood by others
- Intimidates a community or section of it

2.52 An ASBO will be granted where the individual is named, and a judge can be satisfied that:

- On the balance of probabilities the person has carried out the conduct described
- The conduct caused harassment to the community (or is likely to do so)
- The order is necessary for the protection of the community

2.53 The Association will consider using ASBOs to prohibit a person from carrying out Anti-Social acts or from entering specific geographical areas.

2.54 ASBOs involve local people and agencies collecting evidence, however their civil status means that both hearsay and professional witness evidence can be heard in ASBO applications. This allows the Association to protect those people who are reporting the behaviour.

2.55 Breach of an ASBO is a criminal offence, which carries the power of arrest and in some cases imprisonment. It can also be used as evidence in possession proceedings.

Injunctions

2.56 Section 13 of the Anti-Social Behaviour Act 2003 gives the Association the same powers to protect its tenants as Local Authorities. It also widens the circumstances in which it can seek injunctions. The Act enables the Association to apply to the Court for housing injunctions to prevent behaviour capable of causing nuisance and annoyance, which directly or indirectly affects it management functions.

2.57 This makes it easier to exclude perpetrators from areas where they have been causing trouble. Wider categories of people can be protected such as homeowners or leaseholders.

2.58 There are two forms of injunction that the Association may seek, depending upon the circumstances of a case. These are: i) a without notice injunction (or "emergency" injunction) or; ii) a with notice injunction.

2.59 A without notice injunction will be sought in severe cases, where there is a credible risk of the tenancy breach occurring again. Such injunctions would only be sought in exceptional circumstances where it is deemed necessary to provide protection to an Association's tenant, usually within hours of an incident being reported.

2.60 A with notice injunction usually takes 2-3 weeks to arrange, and are used to exclude perpetrators from particular areas in instances where it does not involve immediate threats to a person's safety. They are usually issued for fixed term periods, such as for 6 or 12 month periods.

Possession Orders

2.61 The Association will consider applying to the County Court for a Possession Order where a tenant is in breach of the terms of their tenancy agreement, and all other forms of action to prevent anti-social behaviour have broken down. The Association will seek possession when:

- A notice of intention to seek possession has been issued and the tenant's behaviour continues
- An injunction has been sought against a tenant of the Association and the tenant's behaviour continues
- An ASBO has been sought against a tenant of the Association and the tenant's behaviour continues
- The breach is of such a serious nature that it warrants possession being sought, e.g. a tenant has assaulted or injured another tenant or member of staff/contractor

2.62 At the County Court Hearing the Association will consider seeking the following orders: -

- *Outright Possession Order* - this will be sought where the tenant has made no attempt to change their behaviour and all other options have been tried

- *Suspended / Postponed Possession Order* - the Association will consider a suspended Possession Order on condition the tenant is willing to change their behaviour and will receive the appropriate support to do so

- *Demotion Order* - this replaces a tenant's existing tenancy and gives them a less secure demoted tenancy. At the end of the year if the tenant's conduct has been satisfactory the tenancy will become an Assured Tenancy.

- *Eviction* - this is the Association's last option in dealing with anti-social behaviour and will only be applied for if all other reasonable steps to stop the behaviour have been taken or considered.

DATA PROTECTION AND INFORMATION EXCHANGE

2.63 The Association recognises that complainants will be concerned that providing information could lead to retaliation from the perpetrator. It is important that the information they provide to the Association is confidential. Handling and releasing information provided to the Association is explained in its Access to Information Policy.

2.64 There are occasions when the Association will share information relating to applicants and perpetrators. The Crime and Disorder Act 1998, Section 15, gives the Association power to disclose information when it is necessary to detect or prevent crime.

2.65 The National Housing Federation's guidance on disclosure will be complied with, which states "in order to satisfy the non disclosure exemption in the Data Protection Act any request for personal information whose purpose is the prevention or detection of crime

should specify as clearly as possible how failure to disclose would prejudice the objective".

2.66 Where information is shared with other agencies, the Association will have protocols in place, which clearly state what type of information might be shared, with whom and for what purpose.

SUPPORT OF COMPLAINANT

2.67 The Association will support all complainants by:

- Dealing promptly with reports of anti-social behaviour
- Informing them of any developments relating to their complaint, and how these developments will affect them
- Referring complainants to specialist agencies to provide additional support if this is appropriate
- Providing all complainants with equal access to allow them to report anti-social behaviour. This can include providing interpreters or documents in alternative formats
- Treating complaints confidentially
- Providing complainants with additional security and use of a mobile phone if required
- Offering complainants the opportunity of discussing their situation with a member of staff of the same sex in sensitive situations such as domestic violence, wherever this is practically possible to do so.

WITNESS SUPPORT

2.68 Witness Support is crucial to the successful implementation of this Anti-Social Behaviour Policy. Section 12 of the Anti-Social Behaviour Act 2003 states:

'Landlords should support their complainants by dealing with their complaint promptly, keeping them informed of any developments relating to their complaint and referring them to appropriate support services and should be setting up systems and adopting approaches that seek to improve success rates……While boosting the morale and confidence of witnesses the agencies involved and the wider community.'

2.69 In order to provide support to witnesses of anti-social behaviour the Association will consider the following points:

- Tenants should be integral to the development of the witness support strategy

- Witnesses have the right to be treated with respect and both dignity and sensitivity

- Staff and key officers require the same support from the Association as any other witness

- Witnesses should be given the opportunity to say how they feel and how they are being affected by the situation

- Contact with witnesses should be pro-active and routine rather than responsive

- Any delay or change in action should be explained positively

- Members of the Tenancy Management Team should be aware of the conflict of interest between supporting and championing witnesses and being objective

- The Association must have a reputation for action and support, failure to do this may result in witnesses losing faith and a reluctance to provide further evidence

- Sources of support should regularly be reviewed and updated

- When supporting witnesses the Association should have regard to both physical and emotional support. For example in serious cases, consideration should be given to temporary accommodation or providing witnesses with a mobile phone.

REHABILITATION OF PERPETRATORS

2.70 In addition to taking both a tough line against anti-social behaviour and supporting witnesses to provide an effective service, the Association must consider the positive impacts that support might have on perpetrators.

2.71 Perpetrators often cause acts or instances of anti-social behaviour as a direct or indirect result of:

- Drug Abuse
- Alcohol Abuse
- Mental Health
- Disability
- Youth

2.72 It is important that in order to stop the behaviour the Association will work with and offer support (often via specialist agencies) to perpetrators.

2.73 The Association will consider what action it is able to take in order to create changes in perpetrators behaviour rather than simply displacing it.

OUTSIDE AGENCIES AND PARTNERSHIP WORKING

2.74 The success of this policy is reliant on the Association not operating in isolation. RSLs like Cosmopolitan Housing Association are part of a number of agencies that are affected by, and can take action to deal with, anti-social behaviour. Anti-social behaviour is a

complicated problem and it is highly unlikely that the causes or solutions will be able to be dealt with by one organisation.

2.75 Multi-agency partnerships require landlords to work with residents and agencies such as the Police, Youth offending teams, schools, social services, health services and probation services.

2.76 Development and review of these partnerships can be an effective method of both preventing and taking action against anti-social behaviour.

2.77 By co-ordinating our approach to anti-social behaviour and working with specialist agencies the Association may be able to prevent legal action relating to anti-social behaviour.

2.78 The Association will work with the following and other appropriate agencies to combat anti-social behaviour:

- Local authorities, including Anti-Social Behaviour Units (ASBUs)
- Other Registered Social Landlords
- Tenants and residents
- Police
- Home Office
- Victim Support
- Housing Corporation
- Minority ethnic groups
- Mediation services
- Specialist agencies, e.g. Race Action Net; Merseyside Racial Harassment Unit

WORKING WITH OTHER AGENCIES MANAGING HOUSING STOCK

2.79 The Association partners with Managing Agents to provide Housing Management services. We work in conjunction with these agents and other statutory and voluntary agencies to ensure both preventative measures and procedures are established to minimise risk and to combat anti social behaviour where it exists in our support schemes and within the wider communities in which we operate.

2.80 The Association and our partner agents have jointly negotiated policies and procedures, which we use to deal with matters of anti social behaviour, including use of incidence diaries, and the application of Injunctions and Anti-Social Behaviour Orders.

2.81 All reported incidences of anti social behaviour will be treated in confidence and dealt with sensitively, ensuring evidence is gathered in a manner which is appropriate to the wishes of the individual.

CROSS TENURE ISSUES

2.82 The Anti-Social Behaviour Act 2003 gave the Association increased powers to tackle anti-social behaviour. In addition to tenants of the Association action can now be taken against, and to protect, owner-occupiers and private tenants.

2.83 The Association adopts a 'Neighbourhood Management' approach and will work with the Local Authority through their Crime and Disorder Partnerships, multi-agency partnerships and other RSLs by sharing information and collaboration on policies to address anti-social behaviour.

2.84 On a local "Neighbourhood" level Tenancy Management Officers will build relationships with the Community Police Officer, working in their areas, meeting regularly to discuss cases of anti-social behaviour and agree an appropriate course of action.

RACIAL HARASSMENT INCLUDING OTHER FORMS OF HARASSMENT – INCLUDING HATE CRIME

2.85 The Association will work with the Police and other existing agencies to use all existing remedies both legal and non-legal. Any incident perceived racist or racially motivated will be treated as such, and will be investigated promptly and thoroughly.

2.86 Alternative accommodation will be sought in severe cases and if the harassment is proven, legal action will be taken to prevent further harassment taking place.

2.87 The Association has detailed Harassment and Racial Harassment Procedures which will be used in these circumstances. These are available on request from any of the Association's offices.

DOMESTIC VIOLENCE

2.88 The Association has detailed procedures for dealing with cases of domestic violence, which are available on request. Tenancy Management Officers are trained to:

- advise victims of the options open to them when domestic violence has been committed and to discuss the practical steps that can be taken;
- take statements, and generally gather evidence;
- keep the victim informed of the proposed action, help familiarise the victim with those procedures and to support the victim throughout the case;
- refer victims to specialist agencies who can deal with domestic violence.

MONITORING AND EVALUATION

2.89 The Association will collate and monitor performance information in relation to anti-social behaviour, harassment, racial harassment, domestic violence and hate crimes, which will be routinely recorded by the Tenancy Management Team and reported to the Board of Management where required.

2.90 The Association will monitor all incidents that fall within this policy in order to measure satisfaction with the service, benchmark these statistics against local and national comparator groups, and identify trends and opportunities for achieving continuous improvements in service delivery.

2.91 Statistical reports will be produced monthly for the Director of Housing, Group Chief Executive and Board of Management

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2.92 Although not exhaustive, the kind of performance information that will be routinely recorded will include the following:

- The number of incidents reported, broken down by incident type and area
- Action taken on each case
- Details of the outcome of any case
- Levels of satisfaction with the way the incident has been dealt with

3 IMPLEMENTATION

3.1 The implementation of this policy document will be supported by detailed procedures that set out the steps that staff should follow in response to the range of anti-social behaviour incidents that may arise.

3.2 The Tenancy Management Coordinator will ensure officers treat all reported cases of ASB in accordance with policy and procedure.

3.3 Tenancy Management Officers will be responsible for investigating complaints of anti-social behaviour, agreeing and monitoring action plans and taking action at appropriate times until cases are resolved or closed.

3.4 Tenancy Management Assistants will be responsible for maintaining all records and statistics relating to ASB.

3.5 Detailed information leaflets will be produced that clearly explain how the Assocation will deal with the various forms of anti-social behaviour that might arise. These will be issued to persons reporting such incidents to the Association as a matter of course, and will also be available to all tenants upon request.

4 RESPONSIBILITY

4.1 Overall responsibility for implementation of this policy lies with the Director of Housing Services.

4.2 The Tenancy Management Coordinator is responsible for application of this policy and procedure, monitoring performance, identifying shortfalls and recommending action to rectify situation as applicable.

4.3 Day to day operation of this policy is the responsibility of Tenancy Management Officers.

5 CONSULTATION

5.1 The Association will consult on an annual basis with the Local Authority, outside agencies and benchmarking groups to promote continuous improvement and develop good practice in this policy in addition to making changes as a result of legislation or regulation.

5.2 Prior to making any changes to this policy the Association will consent and consider the view of:

- All relevant staff
- Senior Management Team
- Tenants Forum
- Board of Management
- Residents Associations, Tenants Groups, individual interested tenants
- All relevant outside agencies

6 POLICY REVIEW

6.1 The Association will formally review its Anti-Social Behaviour Policy on a 3 yearly basis. The review will follow the principles of the Association's formal Best Value Review Framework.

6.2 Findings and recommendations will be presented to the Association's Board of Management after the views of the Forum have been considered. Each review will be carried out by a review team.

6.3 Progress reports will be made to the Board of Management and Forum, to enable monitoring against strategic aims and objectives and agreed performance indicators. Performance data will be included in the Annual Report to tenants.

6.4 The Association aims to include in the Team representation from tenants, staff, outside agencies / RSLs and Board Members.

7 TRAINING

7.1 The Association will provide all staff responsible for implementing this policy with comprehensive training.

7.2 Training will be given:

- to new staff
- to existing staff on an annual basis as a refresher/update
- to all relevant staff after changes to policy/legislation
- to relevant outside agencies
- at any other time as identified by the Director of Housing Services, Team Leaders, or Group Policy and Performance Manager

8 ASSOCIATED DOCUMENTS

8.1 The Association has related relevant policies in the following areas:

- Vulnerable Tenants Policy
- Allocations Policy
- Repairs Policy

8.2 The Association has the following procedures to assist staff implement the policy:

- Anti –Social Behaviour procedure

9 POLICY REVIEW DOCUMENT

Policy Title Dated Created	Anti-Social Behaviour Policy 16 March 2004
Review Period Previous Review	3 Years 31 January 2006
Review Committee	Board of Management
Version Date last amended Authorised by	2.3 11th January 2007 Board of Management
Date of last review	January 2007
Date of next review	January 2010