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1. INTRODUCTION

Coastal Housing Group ('CHG') aspires to enable residents to live good lives in confident communities. Our community development work and the way we support residents is designed to meet these objectives, predicated on understanding what matters to an individual and what's strong in communities. We recognise that there are times when these aspirations are impacted by issues such as anti-social behavior (ASB) and therefore, we frame ASB as 'failure demand' in the good life system.

This policy sets when and how CHG, will intervene in cases of anti-social behaviour. CHG is committed to a restorative approach, both in terms of using restorative techniques to build and maintain relationships between individuals, schemes and wider communities but also in using restorative interventions to acknowledge the harm caused by ASB, share the impact this has had and facilitating repair of relationships through mutual agreements. Reconciliation of conflict is essential to support healthy relationships between neighbours and communities and is our central offer to cases of ASB reported to us. Housing staff are trained in restorative practice and supported by trained managers and experts.

Notwithstanding our support for the view of Welsh Government as reproduced below, it is important that we are clear on the types of cases in which CHG can get involved, the types of cases in which we cannot, and, where we can get involved how we will do so.

This policy is owned and administered by the Head of Community Housing, ('HoCH'). The effectiveness of the policy and provision of training will be reviewed annually by the HoCH. This exercise will ensure that the policy is up to date and remains relevant to CHG's needs.

"Anti-social behaviour covers a broad spectrum... It can cause minor irritation or can be utterly devastating. Whilst anti-social behaviour is not just a housing issue, it is clear that the housing sector has an important role to play in preventing and responding to it. Indeed, in many cases social landlords have taken the lead on tackling anti-social behaviour in their communities. There are many examples of good practice within the sector. Much anti-social behaviour is not criminal in its nature, but this type of behaviour does undermine people's confidence that crime is being tackled and fuels a fear of crime."

Welsh Government

2. PURPOSE

The purpose of this policy is to assist residents to live a life free of anti-social behaviour, nuisance and noise. Central to this purpose is our commitment to take a restorative approach to building and maintaining relationships between neighbours and communities, and in repairing relationships where necessary. This purpose was refreshed in 2018, following feedback from residents about what mattered to them.

3. PRINCIPLES

- To take a restorative approach to building, maintaining and repairing relationships
- To listen and understand what the issue is
- To keep people informed and up to date throughout

- To manage expectations by providing realistic information
- To support people to take ownership/responsibility of the issue (where possible)
- To promote partnerships and work with partner agencies to pull in their expertise
- To pull in internal CHG teams (e.g. caretakers) where possible
- To be pro-active in engaging communities and be present and visible in the community
- To be aware of safety considerations at all times
- To be keep up to date with changing legislation

4. WHAT MATTERS

We asked residents what mattered about issues related to anti-social behaviour. They said:

- I want to feel safe, inside and outside of my home - for me and my visitors
- I want to enjoy peace and quiet
- I want to be kept informed if I've raised concerns and for staff to be proactive
- I want to have respectful neighbours
- I want to be more involved in decision making of new residents
- I want to have a healthy quality of life
- I want a home that meets my needs

5. LEGISLATION

- Anti-Social Behaviour Crime and Policing Act 2014
- Equality Act 2010
- Housing Wales Act 2014
- Housing Acts 1985, 1988, 1996, 2004

6. EQUALITY AND DIVERSITY

CHG is committed to equal opportunities and this policy will be operated fairly and equally. CHG will not discriminate, harass or victimise any complainant, witness, alleged perpetrator or other interested party on the grounds of any protected characteristic(s).

The protected characteristics under the Equality Act are:

Age	Pregnancy and Maternity	Sex
Disability	Race	Sexual Orientation
Gender reassignment	Religion of Belief	Marriage / Civil Partnership

CHG must, in the exercise of its housing management functions, have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

This includes the need to:

- (i) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
- (ii) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
- (iii) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.*

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This includes the need to:

- (i) tackle prejudice, and*
- (ii) promote understanding.*

We are not a public authority but we do exercise public functions when we allocate and manage social housing. This means that we have to have regard to the matters mentioned above.

Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

7. DATA PROTECTION

CHG operates a specific Data Protection Policy which governs how the organisation will manage the collection, retention, processing, management and disposal of individual's personal data and special category data. The policy is designed to incorporate all of the legal requirements contained in Data Protection Act 2018, the GDPR and all guidance and best practice issued by the Information Commissioners Office from time to time.

In addition, when dealing with information relating to anti-social behaviour CHG will be careful to differentiate between what information they are able to use and share in investigations and that which they are not.

8. WELSH LANGUAGE

CHG appreciates that members of the public can express their opinions and needs better in their chosen language. Therefore we will ensure that services are available through the medium of Welsh if requested, are of a high quality and provided in a timely manner.

9. DEFINITION OF ANTI-SOCIAL BEHAVIOUR

CHG adopt the definition of ASB as defined in s.2 Anti-Social Behaviour Crime and Policing Act 2014, that is:

- (a) conduct that has caused, or is likely to cause, harassment, alarm or distress to any person,
- (b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- (c) conduct capable of causing housing-related nuisance or annoyance to any person.

Examples of this conduct include, but are not limited to:

Verbal abuse	Fly tipping	Loud music / noise issues	Nuisance caused by pets	Hate incidents / hate crime
Harassment	Victimisation	Vexatious complaints	Behaviour associated with controlled drug abuse	Failing to maintain external spaces to an acceptable standard
Threats of violence	Violence against person(s)	Violence against property	Graffiti	Cuckooing
Littering / accumulating rubbish / goods	Intimidation	Operating businesses without consent	Issues around untaxed / unroadworthy vehicles	Illegal use of premises / community space
Controlled drug dealing	Controlled drug production	Emotional abuse	Abuse / harassment of staff	Online nuisance / harassment / intimidation
Bullying	Domestic abuse* / coercion & control	Failing to maintain property to an acceptable standard	Threats of / violence against staff	Financial abuse

*** Domestic Abuse**

Domestic abuse can take many forms within a household including but not limited to psychological, emotional, financial, physical and sexual.

10. PREJUDICE MOTIVATED ASB (PMASB)

CHG define PMASB as conduct that is motivated by an intolerance or prejudice towards a person or group of persons' protected characteristics, as defined by the Equality Act 2010, or the protected characteristics of a person closely associated with them. In these circumstances, it does not matter whether the protected characteristics are present in the particular case, only that it is perceived to be so.

PMASB can be very closely associated to hate incidents and hate crime. In all cases, CHG will take a

trauma informed, victim led and proportionate approach to intervention and will, where possible, work with the police and other agencies to address these issues and behaviours. This will ensure that the physical, psychological, and emotional impact of behaviour on those affected by anti-social behaviour is always considered and factored into how CHG manage situations.

Cases aggravated by PMASB and / or where the recognised degree of trauma is high will be treated as a priority.

11. CIRCUMSTANCES WHEN CHG WILL GET INVOLVED

CHG may intervene in cases where anti-social behaviour is enacted by a resident(s), a member of the resident(s)'s household and/or visitors. In these circumstances it does not necessarily matter who the behaviour is directed towards. This could include if it is directed towards our staff, agents and/or contractors. Each case will be dealt with according to its particular circumstances.

Equally, CHG may intervene when anti-social behaviour is enacted by persons who are not our residents or associated with our residents's households but the behaviour affects our residents', their families or other people in the communities/areas in which we operate. This could include our staff, agents and contractors. Each case will be dealt with according to its particular circumstances.

CHG will accept reports of anti-social behaviour through any means of recognised and well established communication.

CHG staff will assess every report received. Consideration will always be given to the context of the complaint in whether or not it's a first time complaint or the latest in a catalogue of reported complaints. Where the behaviour complained of and/or the impact of the anti-social behaviour is considered serious and is actionable in law, we will take a trauma informed and proportionate response that gives due regard to the feelings and wishes of those affected by the anti-social behaviour.

Where the behaviour is not actionable we will work with those reporting issues to manage expectations and to establish alternative methods of dealing with the problems. Our primary offer is to facilitate a restorative intervention, supporting the complainant and the individual(s) complained about to engage in a structured, supportive, safe conversation to reach a mutually agreeable solution.

The final decision on whether or not CHG should intervene in a particular case shall rest with the relevant Community Housing Officer and reasons should always be provided to those involved to demonstrate why we have made the decision we have made.

12. COMMUNICATION AND ENGAGEMENT

A preferred method of ongoing communication should be established with people reporting anti-social behaviour from the outset. Once received, the complainant will be provided with a single point of contact and contact details for that person before going forward. That individual will then be responsible for managing the advancement of the case. It will be the responsibility of the staff member dealing with the matter to clarify exactly what the complaint is, who it relates to and what evidence CHG are allowed to use (whether openly or anonymously), to further investigate matters. It

will also be the responsibility of the member of staff dealing with the matter to keep those reporting matters to CHG, updated and informed as to how matters are being managed.

Decisions around vulnerability and risk will be key to determining the most effective and proportionate method of intervention. To assist in this respect, CHG may employ the risk assessment matrix at *Appendix A*. This will help assess the real impact of the anti-social behaviour which is not always in line with the assumed impact. This helps ensure those affected by anti-social behaviour get the help, support and intervention they need.

CHG will always remain neutral in our assessment of the facts of a case and the final decision on if and to what extent CHG will intervene will rest with the relevant Community Housing Officer.

Methods of intervention we will seek / support others to obtain include but are not limited to:

Reactive restorative intervention (repair)	Early restorative intervention (build & maintain)	Community remedy	Community intervention	Community trigger*
Acceptable behaviour contract	Negotiated agreement	Introduction to third party support (internal or external)	Mediation	Taking action to end / extend starter tenancies
Service of notice seeking possession	Proceedings for possession order (outright)	Demotion of tenancy	Proceedings for possession order (suspended)	Use of mandatory grounds for possession
Community protection notice	Civil injunction orders	Criminal behaviour Orders	Public spaces protection order	Closure orders

In all cases CHG will take a proportionate approach to intervention bearing in mind the wishes of those affected by the anti-social behaviour.

*** Community Trigger**

If we become aware that the same individual has reported three or more complaints of anti-social behaviour within a 6 month period, the matter may be reported to the Special Point of Contact (SPOC) for the relevant local authority. Community Housing Managers hold contact information for all the SPOC's CHG work with.

The SPOC will then determine how to progress matters further.

13. RESOLVING CASES

CHG will proactively review the management of anti-social behaviour cases and where agreed with those reporting the anti-social behaviour or otherwise where no further action can be taken, cases will be closed with reasons given for why this action is taken.

14. MEASURES, LEARNING AND IMPROVEMENT

The basis of all learning and study is quality data and CHG commits to keeping proportionate, purposeful, person-centred ASB records. We strive to produce leading measures that study how we are performing to purpose (e.g. 'a life free of ASB' and building restorative communities) and lagging measures (e.g. satisfaction with response, time taken to resolve, etc.).

Measures are captured to understand specific details relating to ASB (e.g. location, type, etc.) and these are regularly reviewed both in teams and at management level. This data assists us to identify hotspots, design interventions and identify partners (internal and external) to work collaboratively with. Cases of ASB are reviewed, using a reflective practice 'fishbowl' approach, on a regular basis. These exercises are undertaken in teams to share examples and invite reflection from colleagues to assist with sharing good practice, designing interventions and improving how we work.

15. COMPLAINTS

Complaints regarding any aspect of how CHG has responded to ASB reports can be made through the company's complaints process by contacting Coastal by telephone, email, live chat, visit or by letter. A copy of the complaints leaflet can be found [here](#).

ANTI-SOCIAL BEHAVIOUR POLICY – AN OVERVIEW

This document is published pursuant to s.218A(6) Housing Act 1996 as a summary of Coastal Housing Group's Anti-Social Behaviour Policy. This is not the Anti-Social Behaviour Policy.

1. CHG adopt the definition of Anti-Social Behaviour as defined in s.2 Anti-Social Behaviour Crime and Policing Act 2014, that is:
 - (a) conduct that has caused, or is likely to cause, harassment, alarm or distress to any person,
 - (b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
 - (c) conduct capable of causing housing-related nuisance or annoyance to any person.
2. CHG define PMASB as conduct that is motivated by an intolerance or prejudice towards a person or group of persons' protected characteristics, as defined by the Equality Act 2010. Cases aggravated by PMASB and / or where the recognised degree of trauma is high will be treated as a priority.
3. CHG may intervene in cases where anti-social behaviour is enacted by a resident(s), a member of the resident(s)'s household and/or visitors. In these circumstances it does not necessarily matter who the behaviour is directed towards. This could include if it is directed towards our staff, agents and/or contractors. Each case will be dealt with according to its particular circumstances.

Equally, CHG may intervene when anti-social behaviour is enacted by persons who are not our residents or associated with our residents's households but the behaviour affects our residents', their families or other people in the communities/areas in which we operate. This could include our staff, agents and contractors. Each case will be dealt with according to its particular circumstances.
4. CHG will accept reports of anti-social behaviour through any means of recognised and well established communication.
5. A preferred method of ongoing communication should be established with people reporting anti-social behaviour from the outset. Once received, the complainant will be provided with a single point of contact and contact details for that person before going forward
6. The final decision on whether or not CHG should intervene in a particular case shall rest with the relevant Community Housing Officer and reasons should always be provided to those involved to demonstrate why we have made the decision we have made.
7. Coastal's response to any particular issue will always be bespoke and proportionate to that case.
8. Complaints regarding any aspect of how CHG has responded to ASB reports can be made through the company's complaints process by contacting Coastal by telephone, email, live chat, visit or by letter. A copy of the complaints leaflet can be found [here](#).