Anti-Social Behaviour Policy

1.0 Purpose and scope

We are committed to supporting and demonstrating empathy towards residents experiencing anti-social behaviour (ASB) and take a harm-centred approach, meaning we consider the impact on the individual in how we respond. This policy sets out how we aim to tackle ASB in a responsive and proportionate manner. This policy also sets out a clear definition of ASB and outlines what measures we take to:

- Investigate reports of ASB in partnership with specialist agencies where appropriate
- Take action to stop ASB where there is sufficient evidence
- Support all residents to sustain their tenancy

This policy applies to all residents, their household members and their visitors.

This policy does not apply in instances of disagreement or disputes between neighbours about day-to-day living, e.g., noises caused by normal use and enjoyment of their homes, lifestyle differences, etc. Our response to this is outlined in our domestic noise and neighbourhood disputes policy.

Where a resident is targeted with anti-social behaviour due to their protected characteristics, we manage these incidents under our hate crime and hate incidents policy. Similarly, where behaviour relates to domestic abuse, we refer to our domestic abuse policy.

Where ASB puts a child or an adult with care and support needs at risk, we will also refer to our safeguarding policies in managing the case.

2.0 Definitions

Anti-social behaviour (ASB) covers a wide range of activities that have a negative effect on the quality of community life and individuals. ASB has many causes; it is defined as:

'behaviour by a person which causes, or is likely to cause, harassment, alarm or distress to persons not of the same household as the person or pose a threat to an individual's personal safety.

Usually, different types of issues present different levels of risk; this informs how we prioritise response times to reports, by highest risk to lowest. However, we will consider the individual circumstances of each case and understand that victims' circumstances can increase risk and impact.

High risk ASB includes issues that pose an immediate and serious risk of harm to affected individuals or involve serious criminal offences. Examples of high risk ASB are:

- Organised criminal activity such as drug dealing, sex work
- Threats and acts of violence
- Criminal damage

Medium risk ASB are issues that are threatening but do not pose an immediate or serious risk of harm. Examples of medium risk ASB are:

- Verbal abuse
- Behaviour related to drug and alcohol use

Low risk ASB is often one-off incidents and issues that do not usually pose a threat to an individual's personal safety. Examples include:

- Littering and fly tipping
- Parking disputes and abandoned vehicles
- Graffiti (unless it is discriminatory or is targeted at an individual)
- Loud noise at anti-social hours of the day from a one-off party

Risk is defined in this policy, as how much a resident or anyone else's personal safety is endangered by an action.

Impact is defined in this policy as the effect ASB has on an individual, this is subjective and personal to the complainant and will depend on their individual needs as well as the issue that they are experiencing. For example, an action may be high impact because it has a profound impact on someone emotionally but carry a low risk, such as, inoffensive graffiti that may not directly threaten their safety.

Triage is the process of sorting issues by how urgent or severe their needs are, so that the most critical cases get help first

Housing-related nuisance means behaviour that directly or indirectly relates to or affects our housing management function to carry out day-to-day activities and the strategic management of our homes.

ASB case review is a mechanism for victims of persistent anti-social behaviour to request that relevant bodies, such as police, health providers and social housing providers like NHG, undertake a joint review of the case. They will discuss what action has previously been taken, and collectively decide whether any further action could be taken. Any individual, community or business can request a case review, and the relevant bodies must carry out a case review if the threshold is met. Our threshold is persistent ASB for six months without an acknowledgement or feeling no action has been taken. More information can be found here.

Occupancy agreement is the agreement such as a tenancy, lease or licence that the resident signs at the start of their residency which sets expectations of both the resident and NHG.

Complainant is the person who is reporting the ASB to us and can include a non-resident complaining about an NHG resident.

3.0 Residents' Responsibilities

We are clear about the standard of behaviour we expect from our residents before they sign an occupancy agreement with us. We expect residents to be considerate neighbours and avoid causing, or allowing their household members or visitors to commit, acts of ASB towards other residents, people in the local area, or towards our staff or contractors, even if this is unintentional. We make it clear to all residents that if ASB arises, it may lead to action being taken against them.

Any unacceptable behaviour towards staff is dealt with in accordance with our unacceptable actions by residents policy. Where ASB causes staff or contractors to feel intimidated or threatened while on site, we will respond in accordance with both our ASB policy and our unacceptable actions by residents policy.

To keep our communities safe, complainants should always report ASB to us in the knowledge that we will be as discreet as possible in handling the case. Should a case go to court, information might have to be disclosed and the complainant will be informed of this in advance.

Where a crime has been committed, we encourage victims and witnesses to report it to the police. We will support victims by signposting them to agencies who will work with them to take action or provide them with additional support where needed.

4.0 Preventative measures for ASB

We understand the distress that ASB can have on communities, and we aim to prevent it from occurring by:

- Ensuring that residents are aware of what constitutes anti-social behaviour, which is specified in occupancy agreements
- Conducting regular inspections of the estates that we manage and promptly reporting repairs that compromise the security of a building or resolving any environmental ASB such as fly tipping or graffiti.
- Carrying out a sensitive let where we recognise that a resident may be at risk of harm if they move into a property

4.1 Early intervention

The aim of our initial intervention is to stop the problem behaviour from escalating. The intervention we use varies according to the nature of the ASB. Early intervention tools include risk assessments, warnings, acceptable behaviour contracts and referring cases to Calm Mediation services where we believe it will de-escalate the case.

5.0 Receiving reports of ASB

Complainants can report any issue that they are concerned about to us via the phone, by emailing their local officer or via MyAccount. Non-residents can complain

to us by contacting the customer services centre on 020 3815 0000. Complainants do not have to be the victim of anti-social behaviour to report something to us.

Where a crime has been committed, the police should always be contacted by the resident in the first instance, as they will often be able to provide a more immediate response.

5.1 Responding to reports

When we first receive a report about ASB, we triage this to establish the risk level, impact, whether further investigation is warranted and what the most appropriate tools to manage the issue are. Where there are multiple connected issues, we categorise the case in line with the highest risk issue.

The issue will be triaged within 1 working day of being reported. If the issue is stand-alone and can easily be resolved with material solutions then we arrange this in accordance with the relevant policy and procedure, rather than following the ASB process in full. For example, if there is a single instance of inoffensive graffiti, this will be managed under our estate management policy and procedure.

Where the initial triage suggests the issue requires further investigation, we proceed with following our ASB process. We recognise that not all ASB needs the same response, so we will respond to different types of ASB in different timescales and often will agree to contact residents less frequently for lower risk cases. This allows us to make sure that we respond to the highest risk cases as quickly as possible and keep those most at risk up to date.

Risk level established at triage	Response time
High risk	Within 1 working day
Medium risk and low risk	Within 5 working days

We remain flexible in our approach and if further incidents occur which demonstrate a case has escalated into ASB although not initially being recognised as this, we reconsider our assessment and respond accordingly.

If we determine the case should be managed under our ASB policy and procedure, we offer the complainant a meeting to discuss the case and complete the ASB interview and action plan in person. We remain flexible in our approach and may complete this over the phone or in our office, where the resident prefers or it is more appropriate.

Where we feel a faster response time to those listed above is appropriate to correctly manage the case, we may respond faster than this.

6.0 Investigating ASB

Where we decide further investigation is necessary, we interview the victim or complainant and complete an action plan with them. We complete a risk assessment with the complainant that is clear and realistic about potential outcomes. During the case, we keep the risk assessment up to date, for example, if we need to interview the perpetrator or if the ASB has increased. We are clear about the timescales involved and we develop an action plan with the complainant, agreeing what action

we will take as well as action that might be required from the complainant to help us investigate or take further action.

All complainants may appoint an alternative contact to support them in communicating with us.

The action that we take will change from case to case, depending on what action is most appropriate, proportionate and effective. At this stage, we will also provide information on other agencies which may be able to offer additional support.

We update the action plan as the case develops and agree contact points to update the resident throughout the case. Where the issue is lower risk and has lower impact, contact points are likely to be further apart than for cases with higher risk and impact. This is both so we can ensure high risk cases are dealt with swiftly and to allow more time for monitoring low risk issues as part of our investigation.

If a resident is unhappy with the action we have taken or our management of the case, they can raise a complaint or ask for an ASB case review.

On some occasions, the alleged perpetrator may report an incident involving the complainant. We adopt the same approach when responding to allegations about the complainant and do not favour one report over another, unless there is clear evidence to support this such as CCTV footage.

6.1 Collecting evidence

Sometimes to support investigations into ASB issues, we ask residents to support us with collecting evidence. This will look different depending on what type of ASB there is. For example, for noise nuisance issues we may ask for audio recordings, whereas for instances of verbal abuse we may ask for witness statements or crime reference numbers.

Where we think a resident may struggle to record information themselves, we offer to support them with any service adjustment, including reasonable adjustments, as per our service adjustment policy. For more details refer to section 11.

6.2 CCTV and GDPR

Where we have CCTV footage that may show ASB incidents, we do not share this information with residents or third parties without liaising with the police. This is in accordance with GDPR UK and our data protection policy.

Where residents record neighbours for purposes of reporting ASB (for example with a mobile), we can review as this as evidence if it is lawful. As part of this we check legitimate interests, minimise data (view then delete unless needed), and decline unlawful recordings such as recordings of private areas without justification. Although there is no reasonable privacy expectation in public/communal spaces, we always review this on a case-by-case basis and ensure that the recording does not constitute harassment.

7.0 Multi-agency and partnership working

We recognise that it is often not possible for any one agency alone to resolve ASB in communities. We adopt a multi-agency approach to preventing and tackling ASB and offer the police and the local authority support and work with them to agree who is best placed to take action.

We work in partnership with agencies at both the strategic level, for example on community safety partnerships, and at operational levels, for example with local police.

We support our residents by asking police safe neighbourhood teams to increase patrols in particular areas where we believe this is needed.

We co-operate fully with the ASB case review process to help resolve cases of ASB.

Where we are made aware that social service intervention is needed or where we suspect a resident has care and support needs, we contact the relevant service, whether adult social services, children's social services or mental health services, to find out whether they are aware of the resident(s) or household members. Where applicable, we work with the relevant social services and mental health services.

We will share information with third party agencies where victims have consented, in accordance with our data protection policy. When a person is assessed to be at high risk of serious harm or homicide, we may share this information without their consent. We ensure the provision of evidence does not put the individual at further risk.

8.0 Recording, reporting and sharing information

We record all ASB cases. Personal or sensitive data will be processed in line with the Data Protection Act 2018 (as amended) and our data protection policy.

While investigating ASB and while taking action, we may not always be able to share updates with residents if this compromises our investigation or because doing so would breach the data protection act by sharing personal or sensitive data about another resident and their tenancy.

Staff must ensure all cases of ASB are recorded and monitored effectively on our online systems to ensure appropriate action is taken based on information provided by residents and agencies. We keep clear records of where a resident has failed to engage with any interventions to manage their behaviour, and this is used to inform decisions around whether to pursue legal action.

This data is collected to:

- Increase understanding of who is experiencing ASB
- Identify ongoing recurring ASB issues
- Tailor services according to the needs of our residents
- Identify performance issues and make improvements to ensure best practice is provided for those experiencing ASB

9.0 Enforcement action

We balance enforcement action and intervention with support for residents who request help sustaining their tenancy. We record and evidence all actions taken to investigate and manage the ASB case. If residents are unhappy with the action we

have taken to address ASB, we encourage them to raise a complaint or request an ASB case review where appropriate.

Where ASB issues have involved damage to communal areas, we may recharge the perpetrator in line with our rechargeable repairs procedure.

9.1 Enforcement action - tenants

We consider legal action where there is sufficient evidence of a tenancy agreement breach. Eviction is only considered either in exceptional circumstances or where all other interventions have failed. Eviction will only be considered where this is proportionate to level of risk and impact of the ASB, hence is unlikely to be considered in cases of low or medium risk ASB. As appropriate, we make use of legal notices, injunctions, respect orders, mandatory possession, discretionary possession and closure orders. This does not apply to leaseholders.

Where it is necessary to secure a tenant and their household's safety, we consider moving them to another home. This may mean moving them outside the local area, if remaining in the area presents risk to their safety. This measure will only be explored when all other interventions have failed and there is high risk.

9.2 Enforcement action – leaseholders and owners

Where leaseholders and owners are perpetrators of ASB we will consult the terms of the lease to consider what action can be taken against them and seek legal advice as required. Where there is evidence that a crime has been committed, this would likely be considered a breach of the lease and options, including forfeiture, will be considered. Alternatively, an injunction or respect order to remedy the breach might be sought.

10.0 Closing the case

After a report of ASB has been investigated, we draw it to a close. A case may be closed where:

- An investigation has been concluded, appropriate action has been taken and no further incidents have occurred over a given period (this will vary depending on the nature of the case);
- We are unable to gather sufficient evidence to enable us to take any action.
- We have investigated the case and have determined that the issue should not be managed under our ASB policy

We discuss the case with the complainant before proposing to close it and explain our reasons for doing so. We listen to any reasons they give us as to why the case should not be closed. While we respect the complainant's wishes, cases will not be kept open simply because this is the complainant's preference and can only be kept open if there is a clear need for this, such as continued incidents or further evidence. Where we are informed of a new ASB case, we open a new case referring to the previous ASB history.

11.0 Addressing individual needs

Our ASB procedure provides staff with guidance on how to respond to the individual needs of residents. We recognise that, due to individual needs, some residents may

experience higher impact from ASB and this is factored into our triage, risk assessment and action plans.

Similarly, we recognise that the individual needs of a perpetrator can be the reason why they are causing ASB. In the first instance, we will ensure that the victim and/or perpetrator are signposted to the support and resources they need as part of any action plan.

Where possible, we utilise data we have collected on residents' individual needs and use this to inform our approach as per our service adjustment policy.

Some examples of how we factor individual needs into assessing risk and impact are provided below:

- Detrimental impact on an existing condition: for example, the mental health of a complainant may be detrimentally impacted by ASB.
- Safety: ASB may pose a higher risk to safety to some individuals, including children or people with a learning disability. We follow our safeguarding policy where such concerns arise.
- New health impact: We are mindful of the negative effects that ASB may have on the physical wellbeing of victims, for example by increasing stress and anxiety levels.

12.0 Our approach

In writing this policy we have carried out an assessment to ensure that we are considering equality, diversity and inclusion.

To request a copy of the assessment, please contact us at policy@nhg.org.uk

13.0 Reference

- Anti-social Behaviour, Crime and Policing Act 2014 and 2026
- Equality Act 2010

Document control

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Version Control

Date	Amendment	Version
02.01.2019	New NHG policy	1.0
29.01. 2021	COVID statements added	1.1

21.03.2023	Clarified different approach to enforcement action against tenants and homeowners; new section on CCTV and GDPR; new section on health and ASB	2.0
03.08.2023	Community trigger replaced with ASB case review	2.1
26.02.2024	Added statements around demonstrating empathy toward customers experiencing ASB; merged 5.3 Tenancy Support with 7.0 Addressing Individual Needs	2.2
1 May 2026	Added statements on: keeping clear records of where a resident has failed to engage with any interventions to manage their behaviour; utilising service adjustment data; accepting video recordings from residents	2.3
26th October 2026	Full policy review	3