

Anti-Social Behaviour Policy

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Consultation	Completed	Reviewed By	Head of Housing & Resident Services
EIA	Completed	Responsible Officer	Director of Customer Services
DPIA	Completed	Approval By	BCHG Board

1. Purpose

At Black Country Housing Group (BCHG), we are committed to ensuring that everyone living in, or visiting, our homes and communities feel safe, respected, and supported.

The purpose of this policy is to provide a clear framework for preventing, identifying, and responding to antisocial behaviour (ASB) in a fair, consistent, and timely way.

We recognise that effectively addressing ASB requires a coordinated and partnership-based approach. We will work collaboratively with key agencies, including the police, local authorities, and community safety partners, to deliver a responsive and proportionate service, particularly in complex or high-risk cases.

We are committed to taking proactive and preventative action to reduce ASB and community harm. This includes early intervention, effective information sharing, and maintaining a visible presence within our communities, to promote safe and sustainable neighbourhoods.

2. Scope

This policy applies to antisocial behaviour (ASB) that impacts our residents, communities, and neighbourhoods where BCHG owns or manages homes. It applies where:

- Individuals living in a BCHG home are affected by ASB; and/or
- Individuals are affected by ASB caused by someone living in a BCHG home.

The policy covers ASB occurring within our homes, communal areas, and the wider neighbourhood where it is linked to our residents, tenancies, or properties.

Non-Statutory noise nuisance and environmental crimes such as fly tipping and graffiti will be dealt with under the Neighbourhood Management Policy in the first instance. For any on-going concerns where intervention was not successful, will be dealt with under the ASB Policy. We will always be clear with customers which policy their concern falls under.

We have considered the expectations set out in the Regulator of Social Housing's Neighbourhood and Community Standard and Transparency, Influence and Accountability Standard. This policy also reflects the requirements of the Housing Ombudsman Complaint Handling Code.

3. Definitions

For the purposes of this policy, Black Country Housing Group (BCHG) adopts the definition of Anti-Social Behaviour (ASB) set out in Part 1 of the Anti-Social Behaviour, Crime and Policing Act 2014 and the relevant grounds for possession contained within housing legislation. ASB includes, but is not limited to:

- Conduct that has caused, or is likely to cause, harassment, alarm, or distress to any person.
- Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- Conduct capable of causing housing-related nuisance or annoyance to any person
- Conduct by the tenant or a person residing in or visiting the property where they have been: -
- guilty of conduct causing or likely to cause a nuisance or annoyance to a person residing, visiting, or otherwise engaging in a lawful activity in the locality,
- guilty of conduct causing or likely to cause a nuisance or annoyance to the landlord of the property, or a person employed (whether by the landlord) in connection with the exercise of the landlord's housing management functions, and that is directly or indirectly related to or affects those functions or
- convicted of -
 - (i) using the property or allowing it to be used for immoral or illegal purposes, or
 - (ii) a criminal offence committed in, or in the locality of, the property

BCHG takes a zero-tolerance approach to hate crime and domestic abuse. Hate crime and hate incidents will be managed in line with BCHG's Hate Crime Policy. Domestic abuse will be managed in line with BCHG's Domestic Abuse Policy. Where incidents also constitute anti-social behaviour, BCHG will take appropriate action under this policy alongside any action taken under those policies.

For this policy, "Proportionality" means, our actions will be justified, fair and appropriate, based on our policy, procedure and with due consideration being given to any human rights issues and/or any protected characteristics such as a disability.

In terms of breach of tenancy, eviction is a last resort and will only normally occur for extreme cases involving criminality or long-term harm to neighbours and or the locality.

Anti-Social Behaviour is not low-level neighbour disputes or day to day living noise which is not excessive or unreasonable. In these cases BCHG's intervention can make things worse and we will request residents talk to each other to resolve concerns. Where this fails mediation may be recommended but not delivered by BCHG.

Vulnerability means a circumstance or condition that may increase a person's risk of harm, reduce their ability to protect themselves, or affect their ability to access services or engage with BCHG. This may be temporary or long-term and can include physical or mental ill-health, disability, age, domestic abuse, financial hardship, or other personal circumstances.

Risk Assessment means the process of identifying and evaluating the actual or potential risk of harm to individuals arising from reported behaviour, in order to determine the appropriate response, support, and level of intervention required.

Hate Incident means any incident which is perceived by the victim, or any other person, to be motivated by hostility or prejudice towards a person's actual or perceived protected characteristic or identity, whether or not a criminal offence has occurred.

Hate Crime means a criminal offence which is perceived by the victim, or any other person, to be motivated by hostility or prejudice based on a person's actual or perceived race, religion, disability, sexual orientation or transgender identity.

Victim-Centred Approach means placing the needs, safety, wellbeing and desired outcomes of the victim at the heart of case management, ensuring they are listened to, kept informed, appropriately supported and involved in decisions affecting their case.

Domestic Abuse means any incident or pattern of controlling, coercive, threatening, violent or abusive behaviour between people who are personally connected, including physical, emotional, psychological, sexual or economic abuse, as defined by the Domestic Abuse Act 2021.

4. Related Policy / Procedure and other Documents

Anti-Social Behaviour Procedure
Estate Management Policy
Hate Crime Policy
Domestic Abuse Policy
Complaints Policy
Data Protection Policy
Safeguarding Policy
Health & Safety Policy
Annual Tenancy Review Policy
CCTV Policy

5. Roles and Responsibilities

The Director of Customer Services has overall strategic oversight and accountability for the effective implementation of this policy.

The Head of Housing & Resident Services has day-to-day operational responsibility for this policy and for ensuring it is implemented consistently across the service.

The Housing Operations Manager is responsible for ensuring that colleagues are aware of the policy and apply it appropriately in practice.

6. Policy Statement

We recognise that there are areas where we can strengthen our approach to preventing and tackling antisocial behaviour (ASB). This policy sets out our commitment to continuous improvement through the following actions:

Put residents first through a trauma-informed approach

We will take a person-centred and trauma-informed approach, recognising the impact ASB can have on individuals and communities. We will respond with empathy, understand people's experiences, and ensure appropriate support is in place.

Respond in a timely and proportionate way

We will respond promptly to all reports of ASB, contacting customers within 1 working day where there is a significant risk to personal safety, and within 5 working days for all other cases. This forms part of our key performance standards.

Strengthen partnership working

We will build consistent and proactive relationships with the police, local authorities, community safety

teams, and safeguarding partners. This will support coordinated responses, effective multi-agency case management, and improved outcomes, particularly in complex or high-risk cases.

Improve prevention and early intervention

We will take a proactive approach to preventing ASB, including early intervention, use of non-legal remedies, and engagement with customers to reduce escalation and repeat incidents.

Support behaviour change and work with perpetrators

We will take a balanced approach that holds perpetrators to account while also seeking to understand underlying causes of their behaviour. Where appropriate, we will work with support services and partner agencies to address needs such as vulnerability, mental health, or substance misuse, to reduce reoccurrence.

Use data and intelligence effectively

We will strengthen our use of data, customer insight, and local intelligence to identify trends, target resources, and intervene earlier in areas experiencing ASB.

Ensure consistency in case management

We will improve the quality and consistency of case handling through clear procedures, regular case reviews, and ongoing support and guidance for colleagues.

Set clear expectations with customers

We will communicate clearly with customers about acceptable behaviour, the action we can take, and where there may be limitations or a need for other agencies to lead.

Improve access and encourage reporting

We will make it easy for customers to report ASB, ensuring our services are accessible and that reasonable adjustments are made where needed, particularly for customers with communication or support needs.

Learn and continuously improve

We will use feedback, complaints, and TSM feedback to improve our services. This learning will be embedded into training, guidance, and service development.

7. Policy Details

How we categorise ASB

ASB can come in many forms. To help us assess risk, identify trends and ensure a consistent response, BCHG will categorise reports under one or more of the following: -

- Actual Violence
- Animal Related Incidents
- Arson
- Car Parking Issues
- Criminal Damage and Vandalism
- Drug Related Activity
- Harassment and Intimidation
- Hate Crime and Hate Incidents
- Persistent Noise Nuisance

- Threatened Violence
- Vehicle Related Nuisance
- Youth Related Anti-Social Behaviour

These categories are used for case management, monitoring and reporting purposes. Each report will be assessed on its individual circumstances, impact and level of risk, and may fall within more than one category.

We will take responsive action to any report of ASB by understanding the root cause and the risk of harm to the complainant.

It is important to be clear that not all behaviour that is called ASB has the same impact on residents and communities and BCHG does not have the same enforcement powers in all cases.

Low-level neighbour disputes, lifestyle differences and everyday household noise that is not excessive or unreasonable will not normally be considered Anti-Social Behaviour. BCHG will provide advice and support to help residents resolve issues informally and may signpost or refer residents to independent mediation services where appropriate. Where concerns escalate or present a risk of harm, BCHG will review the matter and consider further intervention.

Prevention

BCHG is committed to preventing Anti-Social Behaviour (ASB) and addressing concerns at the earliest opportunity. Early intervention helps create safe and sustainable communities, supports tenancy sustainment and reduces the need for formal enforcement action.

Preventative measures may include:

- ✓ Ensuring applicants meet the requirements of our Lettings Policy, including consideration of previous serious ASB where permitted by law and policy.
- ✓ Making residents aware of their rights and responsibilities in relation to ASB at tenancy sign-up and throughout their tenancy.
- ✓ Identifying vulnerabilities and support needs at an early stage and providing or facilitating appropriate support where possible.
- ✓ Maintaining tenancy agreements that clearly set out expectations regarding behaviour and respect for neighbours and communities.
- ✓ Encouraging positive community engagement and participation.
- ✓ Working in partnership with the Police, Local Authorities, support services and community organisations to prevent and address ASB.
- ✓ Providing advice, support, signposting and referrals to relevant agencies where additional assistance is required.

Self Help

In addition to the legal responsibilities set out in their tenancy agreement or lease, we will encourage all residents to:

- Where appropriate try and resolve minor personal disputes with their neighbours and try to resolve any such problems themselves in a reasonable manner where possible
- Report criminal activity including threats or acts of violence, to the Police as well as to BCHG, where the matter affects their tenancy or neighbourhood
- Report all incidents of ASB, harassment and domestic abuse to the Police as well as to BCHG so that appropriate support and action can be considered

- Work with BCHG to resolve disputes/issues, for example by providing evidence of ASB, giving witness statements, attending Court hearings, etc. and allowing noise monitoring equipment to be installed if necessary.
- Work with BCHG to help resolve concerns, including providing information or evidence where appropriate, such as incident diaries, witness statements or other supporting information
- Engage with agreed actions and support services, including mediation, where appropriate to help achieve a positive and sustainable resolution.

Intervention

Where appropriate, BCHG will intervene to address ASB. We recognise that each case is different and our response will be tailored to the circumstances, level of risk and impact on those affected. We will work with other BCHG departments and external organisations to deliver a wide range of interventions, including:

Responding early to an initial report by way of verbal and/or written warnings

- Encouraging mediation, both informal and formal where available over the phone
- Suggesting and/or providing diversionary activities such as employment training, "getting involved", volunteering for the NHS etc.
- Consider and/or facilitate Community Remedies which give complainants a say about what out of court punishment should be given to perpetrators of low-level crime and anti-social behaviour
- Working in partnership with the Police, local authorities, support providers and other agencies, including using proportionate enforcement measures such as injunctions where necessary and appropriate.

Enforcement

As a Social Business we take enforcement action very seriously and before taking such action, we will thoroughly investigate a complaint(s) and gather all appropriate evidence. We will always consider whether the action we take is appropriate and proportionate on a case-by-case basis and will seek legal advice if necessary. Any action that leads to legal proceedings, particularly a Claim for Possession, will be approved by a Director of Customer Services

Where persistent or serious Anti-Social Behaviour is caused, BCHG will issue a Notice Seeking Possession giving two weeks' notice (in accordance with the Anti-Social Behaviour Action Plan 2023). This will be authorised by Head of Housing or the Director of Customer Services

The Anti-social Behaviour Crime and Policing Act 2014 introduced measures to landlords to tackle ASB. These include:

1)The absolute mandatory ground for possession based on ASB

BCHG will consider the proportionality of issuing applications using the absolute mandatory ground 7A, Schedule 2 of the Housing Act 1988 for possession in the following circumstances:

Where the resident, a member of their household or a visitor:

- has been convicted of a serious offence, or breaching a Criminal Behaviour Order, or
- has been found, by a court, to have breached a civil injunction or
- has been convicted of an offence under the Environmental Protection Act 1992 (breach of an Abatement Notice or court order to abate statutory noise nuisance) or breach of a closure order.

All applications for mandatory possession will be approved by a Director of Customer Services, and the resident will be given the opportunity to appeal the decision within 7 working days from when a Notice Seeking Possession, citing this ground, is served.

Any appeal of our decision must be in writing and delivered to the Head of Customer Relations. The appeal process will incorporate the following: -

- Allow for either party to supply and refer to written evidence if appropriate.
- Allow for an oral and/or written review where appropriate.
- The resident will be given written reasons for the decision made in respect of the appeal.

2) Possession proceedings on discretionary grounds

BCHG will consider, on a case-by-case basis, whether it is appropriate to include mandatory grounds for possession alongside discretionary grounds. The Head of Housing will determine such cases, after taking legal advice if necessary.

3) Demotion of tenancy

A demoted tenancy is a tenancy issued by order of a court and "downgrades" a tenancy from the security it enjoys, as an assured tenant, to an assured shorthold which is less secure. Where appropriate, BCHG will consider applying for 'demotion' alongside other grounds for possession. If the conditions of the demoted tenancy are breached, we can end the tenancy by way of accelerated possession proceedings which will be approved by the Director of Customer Services.

Other Enforcement Options

We will work in partnership with other agencies and where it is appropriate and proportionate to do so put in place or enable them to obtain:

Civil Injunctions – Prohibit a person from doing specific things or require them to take certain action. The power of arrest may be attached.

Closure Orders – Allow a property to be closed due to disorderly, offensive or criminal behaviour. These are obtained by the Police or local authority.

Community Protection Notices – Can require a person aged 16 or over, business or organisation to stop behaviour that harms the community's quality of life. BCHG cannot apply directly.

Criminal Behaviour Orders – Made by a criminal court following conviction, to address persistent ASB linked to criminal behaviour.

Dispersal Orders – Police powers to move people away from a specific area.

Dog Control Orders – Measures to address irresponsible dog ownership, now usually covered through Public Spaces Protection Orders.

Case Reviews – Allow a collective review by Community Safety Partnerships where responses to ASB complaints need to be reconsidered.

We will try to reach a satisfactory resolution without legal or enforcement action where appropriate. However, this will not always be possible. Eviction remains a last resort and will only be used in the most serious cases of ASB or where other action is not appropriate because of the resident's circumstances.

Supporting Victims & Witnesses

We will support complainants/ victims and witnesses throughout the duration of a case and beyond where appropriate. We will consider individual needs and may:

- Take measures to improve security
- Make sure we put in place access arrangements to speak with us after normal hours
- Use a security firm to help escort to Court if required
- Work with other agencies such as victim support or the police

- Where appropriate use CCTV
- In extreme cases we may give additional priority for a transfer to another home

Reporting ASB

We will accept reports from ASB from our residents, members of the community, our partners, the Police, and other agencies. Residents will be able to report ASB by phoning us, by letter, by email, through a member of staff, an advocate or through resident groups. We will acknowledge all reports received.

We will deal with all reports of ASB, sensitively and confidentially and within the agreed timescales. We will identify a named officer, for each case, who will ensure the complainants of ASB are kept up to date with issues and/or developments relating to them. We will agree with complainants about when and how they would like us to communicate with them.

Closing Cases

BCHG will aim to resolve ASB cases to the complainant's satisfaction. However, there may be circumstances where it is necessary to close a case without their agreement, for example where the matter has been fully addressed, the complainant has not engaged, the allegations are false or malicious, or the complainant refuses to work with BCHG.

Before closing the complaint BCHG will try to contact the complainant, using various methods such as telephone, visiting and writing. Only after all these attempts have failed will the case be closed. In all circumstances BCHG will inform the complainant in writing of the reasons for the closure of their case.

Feedback

After closing the case we will seek feedback from the residents involved. These reviews are designed to help improve our strategies on prevention, self-help, intervention, and enforcement.

Staff Training

BCHG are members of Resolve ASB who assist us to effectively deal with community safety and ASB issues through training, support, guidance and sharing best practice. We will also ensure that colleagues are fully trained on the procedures that we have in place to enable them to deliver the policy consistently.

Prevent Duty & Safeguarding

BCHG recognises its responsibility to support the safeguarding of residents and communities, including where there are concerns that an individual may be vulnerable to radicalisation, extremism or exploitation. Where such concerns are identified through ASB case management, tenancy management or community intelligence, colleagues will follow BCHG's Safeguarding Policy and relevant referral pathways, including referral to appropriate safeguarding partners or Prevent channels where necessary. Any action taken will be proportionate, evidence-based and in line with data protection requirements, equality duties and our commitment to maintaining safe and inclusive communities.

Information Sharing

BCHG will take an active role in partnerships with local agencies to tackle anti-social behaviour, particularly through local RSL forums and Crime and Disorder Reduction Partnerships. Information Sharing Protocols are, and where appropriate, will remain in place with key local agencies. These are specifically designed to facilitate and govern the effective use of information relating to the prevention, detection and reduction of Crime and Disorder, and anti-Social Behaviour.

7.1 Data Processing

Personal Data: Any personal data will be stored on Housing Management system or securely on SharePoint. Data will be deleted in accordance with the Asset Data Retention and Disposal Policy.

Data Protection: BCHG recognises that cases of ASB are particularly sensitive and will take extra measures to maintain confidence of information. Where possible we will seek to establish information sharing protocols with relevant external agencies to help in managing the cases.

Data Integrity: genuine documentation for identification and evidence used to take legal action will be obtained as proof

7.2 Legal and Regulatory Considerations

Neighbourhood & Community Standard 2024 which includes specific requirements for registered providers to work collaboratively with relevant partners to prevent and tackle anti-social behaviour, support victims and witnesses, and promote safe and well-managed neighbourhoods.

[Housing Act 1985, 1988](#) and [1996](#) – provides the legal framework for social housing management, including grounds for possession and tenancy enforcement

[Anti-Social Behaviour Act 2003](#) – introduced measures to tackle anti-social behaviour, including powers relating to noise nuisance, environmental crime and housing management. [Anti-Social Behaviour Action Plan](#) - provides the primary legislative framework for tackling ASB, including civil injunctions, closure powers, the ASB Case Review process (formerly known as the Community Trigger), Community Protection Notices and grounds for possession relating to anti-social behaviour.

[Crime & Policing Act 2026](#) – Received royal assent on 20 April 2026, waiting for commencement regulations before the new provisions become legal effective.

[Protection from Harassment Act 1997](#) – Makes provisions for protecting people from harassment and defines harassment as conduct causing alarm or distress and must involve the behaviour being repeated on at least two occasions.

[Domestic Abuse Act 2021](#) – strengthens protection and support for victims of domestic abuse and provides the statutory definition of domestic abuse.

[Housing Ombudsman Complaint Handling Code](#) – sets expectations for effective complaint handling and learning from complaints where residents are dissatisfied with the management of ASB cases.

[Care Act 2014](#) – places duties on local authorities and partner agencies to safeguard adults with care and support needs who are experiencing, or are at risk of, abuse or neglect.

[Children Act 1989](#) and [Children Act 2004](#) – establish the legal framework for safeguarding and promoting the welfare of children and place duties on organisations to work together to protect children from harm.

[Crime & Disorder Act 1998](#) – establishes the framework for partnership working between agencies to prevent and reduce crime and disorder and enables the lawful sharing of information where appropriate to support these objectives.

[Anti-Social Behaviour Crime & policing Act 2014](#) – provides the primary legislative framework for tackling anti-social behaviour, including civil injunctions, closure powers, Community Protection Notices, the ASB Case Review process (formerly known as the Community Trigger) and grounds for possession relating to anti-social behaviour.

[Human Rights Act 1998](#) – incorporates the rights and freedoms contained within the European Convention on Human Rights into UK law and requires organisations to act lawfully, fairly and proportionately when making decisions that affect individuals.

[Equality Act 2010](#) – protects individuals from unlawful discrimination, harassment and victimisation and requires organisations to consider the needs of people with protected characteristics when delivering services and making decisions.

[Data Protection Act 2018](#) and UK General Data protection Regulation (UK GDPR) – govern the collection, use, sharing, retention and protection of personal information, including information processed for the purposes of ASB investigations, safeguarding and community safety.

[Counter Terrorism & Security Act 2015/prevent Duty](#) – The prevent duty, established by Section 26 of the Counterterrorism & Security act 2015, places a legal obligation on specified public bodies in England, Wales, and Scotland to have ‘due regard to the need to prevent people from being drawn into terrorism’

7.3 Equality Diversity & Inclusion

We will consider our obligations to perpetrators of ASB who may have a protected characteristic such as a disability. We may, after balancing the needs of neighbours, BCHG’s staff and contractors and property safety proceed with legal action as a proportionate means of achieving a legitimate aim following an appropriate risk assessment.

An Equality Impact Assessment was conducted and found that the policy will have a positive impact on all protected characteristics outlined in the Equality Act 2010

8. Compliance, Monitoring & Reporting

Regular case reviews will be undertaken through supervision and management oversight arrangements. Reflective practice will be used to support learning, improve decision-making, identify good practice, and ensure that cases are managed consistently, proportionately and in a victim-centered manner. Lessons learned from individual cases, complaints and feedback will be used to continuously improve service delivery.

After closing the case we will seek feedback from the residents involved. These reviews are designed to help improve our strategies on prevention, self-help, intervention, and enforcement.

BCHG will maintain an ASB Scorecard to monitor case volumes, performance, emerging trends, hotspot locations, case outcomes and colleague performance. The Scorecard will be reviewed and updated monthly and discussed with colleagues through performance and supervision meetings to identify areas for improvement, share learning and ensure effective management of ASB across our communities.

BCHG Board will receive an annual report on activity in this area, including resident feedback on our approach and how we can improve.

This Policy will be reviewed every three years, and we will use the feedback from residents to improve the service.