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Antisocial Behaviour Policy

August 2024

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|  | Excellent housing in vibrant communities. |
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|  | Respect  We see the positive in everyone, especially our tenants. We treat everyone fairly, regardless of age, race, gender, sexuality or background. We ask for opinions even if we know we might not like what we hear. And we address people’s concerns in any way we realistically can. |
|  | Integrity  What we say in public is the same as what we say behind the scenes. If we say we’ll do something, we mean it. Our tenants can count on us to solve their problems and make sound decisions. |
|  | Aspiration  We want the best for all our current and future tenants. We’re not afraid to strive for things that won’t be easy – or try things that haven’t been done before. We seek out opportunities and welcome change. If it doesn’t turn out as planned, we learn and improve again. And then we try again. |
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|  | |
|  | A) Building and sustaining popular neighbourhoods  B) Creating and supporting greater life opportunities for all  C) Developing greener spaces and community wellbeing  D) Being a dynamic and listening community partner  E) Treating people equally and with respect |

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1. **Introduction**

This document sets out the policy framework within which Queens Cross Housing Association will manage and investigate reports of anti-social behaviour. The policy will contribute to achieving the Associations Business Plan 2021-2025 statement of our Vision – Excellent Housing in Vibrant Communities.

We recognise that feeling safe and secure in your own home is important to our customers and we will do all that we can to ensure that our neighbourhoods are safe places to live. When there is a localised instance of anti-social behaviour, hate crime or criminal behaviour this has an impact on customers, communities and the ability to enjoy living in your home peacefully. We are committed to tackling all reports of anti-social behaviour effectively and this will be achieved using a multi-agency approach, bringing partners together to provide assistance and support to anyone causing anti-social behaviour or being affected by anti-social behaviour.

We are committed to working with people living in our local communities to create desirable and vibrant neighbourhoods. Dealing effectively with anti-social behaviour is critically important to the success of that work. Failure to act quickly or to deal effectively with incidents of anti-social behaviour can severely impact on the quality of life of residents.

We recognise residents and new housing applicants will not want to live in neighbourhoods if they do not feel safe and at ease in their homes and public places if for example they are blighted by graffiti, abandoned cars or public disorder.

The Scottish Social Housing Charter requires all social landlords, working in partnership with other agencies, to ensure that tenants and other customers live in well maintained neighbourhoods, where they feel safe. Queens Cross Housing Association fully endorses this charter outcome, and this anti-social behaviour strategy describes how we will aim to meet that charter outcome and manage, our estates, anti-social behaviour, and neighbour nuisance and tenancy disputes.

There are a variety of legislative arrangements, good practice, policy and procedures, and terms and conditions of tenancy agreements which enable Queens Cross Housing Association, with the support of other agencies, to tackle incidents of anti-social behaviour at various levels of severity. We also aim to design-out opportunities or circumstances which encourage or fuel anti-social behaviour activities.

Queens Cross Housing Association aims to manage and resolve incidents of anti-social behaviour as far as possible, and we will ensure that where we are unable to resolve the matter we will work with our tenants and other agencies that have responsibilities in this area and work together to find a solution.

1. **Legal & Regulatory Framework**

The legislation that defines antisocial behaviour is the Antisocial Behaviour etc. (Scotland) Act 2004. The Act provides that a person engages in antisocial behaviour if they:

* Act in a manner that causes or is likely to cause alarm or distress, or
* Pursue a course of conduct that caused or is likely to cause alarm or distress to at least one person not of the same household as them.

In the definition “conduct” would include speech; and a course of conduct must involve conduct on at least two occasions. The expression “likely to cause” means that the court would decide whether any other standard person of society would find the behaviour complained of antisocial on the balance of probability, that someone other than a victim would find the behaviour anti-social.

We can manage antisocial behaviour using the provisions set out in the Housing (Scotland) Act 2001, as amended. The Housing (Scotland) Act 2014 introduced additional powers in relation to the management of antisocial behaviour, these along with existing measures are detailed below:

* Interim ASBO (Anti-social behaviour order)
* Full ASBO
* Notice of Proceedings for Recovery of Possession
* Decree for eviction
* Streamlined eviction
* SSST conversion

**2024 Act Changes**

**Ending a Scottish Secure Tenancy by Court Order – Conviction of a Crime / Serious Antisocial Behaviour**

Committing serious antisocial behaviour or certain crimes are a breach of the tenancy agreement and can lead to eviction.

If the tenant or anyone living with the tenant at the property or anyone visiting the property, are convicted of using the house, or allowing it to be used for immoral or illegal purposes, or of any offences punishable by imprisonment committed in or around the locality of the property, we are entitled to seek a court order to evict them from their home.

Before we start the court action for eviction, we will serve a Notice of Proceeding on the tenant. The tenant has the right to challenge that decision.

The Housing (Scotland) Act 2014 made this process easier by removing the need for the Court to consider whether it is “reasonable” to make any order for eviction where we are using this ground for eviction.

The Court is required to grant an eviction order if we have served a Notice of Proceedings within twelve months of the date of the conviction (or within twelve months of the conclusion of an unsuccessful appeal against the conviction).

**Conversion to a Short Scottish Secure Tenancy for Antisocial Behaviour**

In certain circumstances, we can change a tenant’s tenancy agreement from a Scottish Secure Tenancy (SST)to a Short Scottish Secure Tenancy (SSST, The Short Scottish Secure Tenancy gives tenants fewer rights and less protection from eviction than a Scottish Secure Tenancy.

These circumstances now include any situation where a tenant or someone living with the tenant has acted in an anti-social manner in or around the property. If we choose to convert the tenancy, we will serve a Notice which will detail the action of the person who has behaved in an anti-social manner and our reasons for wishing to convert the tenancy.

The tenant will have the right to appeal the conversion to the Sheriff Court.

Social landlords can also suspend an application for social housing where the applicant has a history of anti-social behaviour. This is detailed in our Allocation Policy.

**Scottish Social Housing Charter**

The Scottish Social Housing Charter was introduced by the Scottish Government to help improve the quality and value of the services that social landlord’s provide, and to support the Government ‘s long term aim of creating a safer and stronger Scotland.

Outcome 6 of the Charter states that:

Social landlords, working in partnership with other agencies will ensure that tenants and other customers live in well maintained neighbourhoods where they feel safe.

This outcome covers a range of actions that social landlords can take on their own and in partnership with others. It covers actions to enforce tenancy conditions on estate management and neighbour nuisance, to resolve neighbour disputes, and to arrange or provide tenancy support where this is needed. It also covers the role of landlords in working with each other to tackle anti-social behaviour.

Two Charter performance indicators have been developed to evidence to the Scottish Housing Regulator, and our tenants, how well we are managing complaints of anti-social behaviour and our wider estates, they are:

Indicator 15 - Percentage of anti-social behaviour cases reported in the last year which were resolved.

Indicator 22 - Percentage of the court actions initiated which resulted in eviction and the reasons for eviction.

Targets for these indicators are set by Queens Cross on an annual basis to ensure that we provide a high-quality service to our customers.

In practice anti-social behaviour can mean different things to different people. It can cover a wide range of behaviours from serious harassment, dog fouling to criminal damage to property. Behaviour regarded as acceptable by some can be seen as anti-social and unacceptable to others.

1. **Key Principles**

We aim to work with multiple agencies to tackle anti-social behaviour with prevention, enforcement and support when required for victims and perpetrators. We will achieve this by implementing the following objectives:

* Provide education and information to our tenants on how anti-social behaviour impacts our tenant’s lives and our communities.
* Make our new tenants aware of their responsibilities under the terms of their tenancy agreement.
* Update our existing tenants on their responsibilities for being a good neighbour, via our Good Neighbour Charter
* Early intervention using a multi-agency approach. Working with partners, such as Police Scotland, and sharing information with relevant organisations.
* Ensure all reports of anti-social behaviour are recorded, taken seriously and investigated thoroughly.
* We aim to resolve all anti-social behaviour complaints within 10 working days for medium priority complaints and 20 working days for high priority complaints and to keep the customer updated at all times. We will inform the complainant of the outcome of our actions. The exception will be cases involving criminal behaviour where we are waiting for the outcome of a court case.
* Considering and utilising all tools and enforcement powers that are available to us.
* Providing our staff with clear guidelines, written procedures and training on how to effectively manage anti-social behaviour cases.
* Minimise the impact of anti-social behaviour by providing the appropriate level of advice and support to victims, witnesses and perpetrators.

The Association aims to manage anti-social complaints irrespective of tenure type. This means we will investigate reports of anti-social behaviour caused by our own tenants or other local residents and anyone else that can be identified as causing anti-social behaviour.

Where we have no scope to resolve non-tenant behaviours, we will pass all available information to the appropriate authorities, including Police Scotland where appropriate, and we will signpost to other agencies. We will provide support where we can to find a solution to such behaviours.

1. **Prevention and Early Intervention**

Developing a strategic and multi-agency approach to preventing anti-social and criminal behaviour is a priority for Queens Cross Housing Association. In partnership with Police Scotland and other relevant stakeholders we will undertake ongoing assessments of the nature and extent of anti-social behaviour, hate crime and criminal acts across our neighbourhoods. This will allow us to identify emerging trends, identify the communities where anti-social behaviour problems are most prevalent and to design services and prioritise the allocation of resources based on robust intelligence and clearly identified local need.

Research has shown that perceived agency inaction in tackling “lower level” anti-social behaviour significantly reduces community confidence in an organisation’s ability and capacity to tackle more serious problems. We know that serious offences have the most traumatic impact on individuals, but these types of offences are rare and affect a relatively small number of households. Persistent low level unresolved anti-social behaviour negatively impacts customer satisfaction levels across our neighbourhoods. With patch sizes averaging 300 properties for each Housing Officer we are able to deal with these in a robust, timely manner and by doing so stop them escalating into more serious forms of behaviour.

We recognise that, prevention, early intervention, education and support should be at the heart of our approach to dealing with anti-social behaviour. We will use the following methods:

**Raising Awareness of Tenant Responsibilities**

Under the terms of their tenancy agreement, all Queens Cross tenants are responsible for the behaviour of every person (including children) living in, or visiting, their home. This includes responsibility for their behaviour in the home, on surrounding land, in communal areas (close, stairs, landing, lifts, entrance foyers, shared gardens etc.) and in the surrounding area of the property.

An important part of raising awareness of tenant responsibilities is agreeing local priorities with our Community Involvement Groups. Effective and timely reporting of anti-social behaviour complaints and complying with the terms and conditions of the tenancy agreement is an excellent example of how community buy in can positively impact our neighbourhoods and our tenant’s quality of life.

Partnership working with our Neighbourhood Groups and local communities is crucial to ensuring a broad range of approaches and solutions can be deployed or considered when managing cases of anti-social behaviour. No single agency or organisation can tackle anti-social behaviour alone. We work jointly with our colleagues in Police Scotland, Fire and Rescue Scotland, Glasgow City Council, NHS, Criminal Justice and with neighbouring social landlords.

**Good Neighbour Charter**

We have developed a Good Neighbour Charter to encourage positive behaviours by our staff and residents. We hope this proactive approach will minimise anti-social behaviour and empower our customers and our staff to take pride in the communities we live and work in.

**Education**

We are committed to educating our staff and residents on anti-social behaviour and do this in various ways including:

* + Promotional campaigns through our social media platforms
  + Clear and up-to-date information on our website
  + Regular staff training and clear processes and guidance
  + Information leaflets provided to new residents and anyone who is making an anti-social behaviour complaint.
  + Linking in with our key partners and signposting effectively
  + Communicating effectively with our customers

1. **Agreed Categories & Timescales**

Following a consultation with our tenants we have defined and categorised the different types of anti-social behaviour according to their level ofseverity. We have agreed the following timescales to action and resolve complaints of anti-social behaviour:

|  |  |  |
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| **Category** | **Definition** | **Timescales** |
| **High**  **Priority** | * A conviction for drug dealing (supply or intent to supply) or production of a controlled drug * Criminal charges relating to firearms * Criminal behaviour involving serious incidents of violence or threats of violence towards any member of the public * Running a brothel * Dealing in stolen goods * Illegal betting or illegal gambling * Serious assault * Serious harassment * Hate crimes (racial, sectarian, homophobic, religious, disability etc.). * Domestic violence * Serious damage to property including wilful fire-raising | **Action within 1 working day**  **Resolve within 20 working days**  (exception will be cases involving criminal behaviour where we are waiting for the outcome of a court case) |
| **Medium Priority** | * Aggressive or abusive behaviour * Drug / Solvent / alcohol abuse * Verbal or written harassment * Noise nuisance or disturbance * Vandalism * Graffiti * Non-accidental bin fires | **Action within 1 working day**  **Resolve within 10 working days** |

1. **Complaints not managed under the Anti-social Behaviour Policy**

**Lifestyle clash or non-corroborated complaints**

There are some situations and behaviours which do not constitute anti-social behaviour and there is very little we can do to resolve these. Some issues simply result from the differences in the way that people lead their lives. Examples include:

* A neighbour using a washing machine early in the evening.
* The sound of a neighbour moving around their house in the flat above
* Children playing in an appropriate manner and at a reasonable time.
* DIY being done within the times stipulated on the Tenancy Agreement.

**Social Media Activity**

Unfortunately, some people use social media for making offensive and/or inappropriate comments.

Unpleasant or offensive comments directed at tenants on social media sites will not be dealt with by Queens Cross Housing Association, unless there is a criminal offence, where Police Scotland has been involved. A criminal offence may include threats to kill, threats to cause damage, criminal conduct amounting to harassment and comments that incite racial hatred and violence.

For general unpleasant or inappropriate posts, in the first instance, tenants will be advised to contact the social media site on which the comments have been made and ask for their assistance. If they believe they have been libelled to the extent that they wish to take legal action, they will be advised to consult with a solicitor.

**Domestic CCTV Cameras**

Queens Cross recognises that some of our tenants may feel more secure if they install external CCTV to deter crime or if they have been experiencing problems of anti-social behaviour. In contrast we also recognise that some tenants may find the installation of a CCTV camera on their neighbour’s home a breach of their privacy.

Tenants who wish to erect a CCTV camera to their property must apply for permission in writing to our maintenance department, before installation, so we can ensure there is no risk of damage to our property.

Tenants seeking to install domestic CCTV will be advised to read the Information Commissioner’s website for guidance on the Code of Practice on domestic CCTV. If we receive any complaints in relation to the installation of CCTV, we will also direct them to the Information Commissioner’s online toolkit that will advise the best course of action.

**Estate Management Issues**

Issues such as dog fouling, untidy gardens, cleanliness of common areas, fly tipping, roads and parking issues will be dealt with under our estate management procedures.

1. **How we will manage an anti-social behaviour complaint**

**Receiving a report of antisocial behaviour**

Residents can report anti-social behaviour by telephone, email, in writing, online via our website, via the tenant app or in person and will be advised, in all instances, to report criminal behaviour to Police Scotland. We acknowledge complaints in writing unless the complaint has been made anonymously.

When a complaint is made, we record all details on our housing management system and open a complaint - this is to ensure there is a record of the complaint (you should be provided with the complaint reference number). We will advise you if you need to report the matter to other agencies such as Police Scotland.

**Our role in managing an anti-social behaviour complaint.**

Our staff will be fair and firm, remaining impartial and always observing confidentiality. We will be clear and realistic about potential outcomes as anti-social behaviour is very complex and often requires many different approaches to resolve ongoing issues.

We will make every effort to gather all of the facts of the incident by speaking to any witnesses or neighbours. , If we identify a risk, we will report this to the relevant agencies.

We will take a customer focused approach to tackling anti-social behaviour, working with the complainant and the alleged perpetrator with a view to reaching agreed actions, timescales and ultimately closure. We always endeavour to stick to timescales, but we will keep you informed if the timescale cannot be met.

We will sign post to other relevant agencies, for example where there has been criminal activity, we will encourage these types of incidents to be reported to Police Scotland for them to carry out a criminal investigation.

Clear processes and guidance have been developed for staff to refer to when manging complaints of an anti-social nature, this will be used in conjunction with ongoing training to ensure best practice and consistency across all teams.

**Action Planning**

A Housing Officer will have the overall responsibility for managing an anti-social complaint. As part of the process they will discuss and agree an appropriate action plan with you, advising the steps we can and will take to investigate your complaint. They will also:

* Advise you of the process and timescales.
* Be honest about what we can and can’t do and may direct you to other agencies if appropriate.
* Provide any advice or guidance required.
* Advise you of any steps you may need to take, such as keeping a log of incidents or contacting other agencies at the time of a future incident.

**Investigating a complaint**

We will fully investigate all complaints of anti-social behaviour. We will do this by:

* Gathering information to corroborate the allegation. This may include witness statements or speaking with Police Scotland or any other agencies that were involved (it isn’t the role of the Housing Officer to investigate criminal activity this remit lies with Police Scotland)
* Arrange to meet with various parties including the alleged perpetrator to gather all the facts.
* We will work with all parties and other agencies to gather evidence and identify appropriate action to try and resolve the issue.
* We will communicate with all parties throughout the process providing them with key information regarding the complaint and the actions we are taking.

**Our role in supporting customers when managing complaints.**

We will always strive to take a preventative and supportive approach when managing complaints of anti-social behaviour.

We endeavour to identify if anti-social behaviour is a result of an underlying issue or vulnerability. If we ascertain there is a support requirement, we will make appropriate referrals to relevant agencies to ask for support to be put in place.

We will meet with other agencies to ensure good communication and a multi-agency approach is taken and that the key agencies are involved in the process.

What residents can do to help resolve Anti-Social Behaviour

Queens Cross cannot tackle anti-social behaviour alone. There are steps that our tenants can take to assist us to resolve anti-social behaviour. These include.

* Being aware of the mixed society we live in and showing tolerance to other people who have a different background or lifestyle.
* Realising that your enjoyment of life at home should not cause a neighbour any distress.
* Read and understand the terms of your tenancy agreement and ensure that all behaviour complies with this.
* Make children and visitors aware of the need for good, neighbourly behaviour.
* Reporting incidents to us and other relevant agencies such as the Police or the Council at the time of the incident, this will ensure the most effective outcome.
* Keep us informed of details of ongoing problems.
* Assist us with keeping records of nuisance and anti-social behaviour.
* Do not make malicious or vexatious complaints (which are complaints without basis);
* Understand that we will use a range of measures to tackle anti-social behaviour depending on the severity of the case. Legal action is not appropriate in all cases and where we do decide to take legal action it will be a last resort after all other reasonable attempts to resolve the issue have been exhausted.
* Understand the limitations we have as a landlord when dealing with cases of anti- social behaviour.
* Understand that tackling anti-social behaviour can be a lengthy process.
* Co-operate with Queens Cross in trying to resolve anti-social behaviour, including engaging in mediation.

**Resolve**

We aim to manage complaints in a timely manner and will take appropriate action where we have sufficient corroboration or evidence to do so. We will communicate our outcomes to all parties involved and will provide you with any relevant advice or signpost you to other agencies if this is more appropriate.

**Escalation or enforcement action**

Our approach to the use of enforcement action will be informed by the type and severity of the anti-social behaviour that has been reported. Whilst recognising that enforcement action needs to be appropriate, proportionate and timely, the wellbeing and protection of our tenants and communities will always be at the forefront of our decision-making process.

Depending on the circumstances and the nature of the anti-social behaviour, our staff will utilise the various tools available to them to manage anti-social behaviour and the perpetrator and this will include the use of:

* Acceptable Behaviour Contracts (ABCs)
* Unacceptable Behaviour Notices (UBNs)
* Mediation
* Warning letters
* Interim Anti-social Behaviour Orders (Interim ASBOs)
* Anti-social Behaviour Orders (ASBOs)
* Conversion to a Short Scottish Secure Tenancy
* Notice of proceeding for Recovery of Possession (NPRP)
* Eviction Orders
* Fixed Penalty Notices for fly tipping, litter, and dog fouling (GCC)

1. **Malicious or Vexatious Complaints**

The making of malicious or vexatious complaints can be a form of harassment or anti-social behaviour whereby an innocent resident is subject to unfounded, exaggerated or dishonest complaints by someone seeking to cause a detriment to that resident.

A vexatious complaint is a complaint without any merit which has been made solely to harass or intimidate another resident or a member of staff.

A malicious complaint is a complaint that is false, and the intention is to cause harm or damage to another resident or a member of staff.

Whilst Queens Cross staff will respond to complaints made in line with the policy, part of their investigation may have to include the possibility that the complainant may have certain motives for making the complaint.

If it becomes clear that a complaint is malicious or vexatious then appropriate action will be taken against the perpetrator, as would be the case for any other form of harassment or anti-social behaviour. , This will be in line with our Managing Contacts Policy.

1. **Involving and Empowering Local Communities**

We recognise the importance of engaging with our customers in such a way as to help individuals feel more confident in relation to accessing our services when they need them, and to providing the information they need to make decisions for themselves and their communities. To deliver on this ambition we have committed to co-creating with our customers a refreshed community governance model that will provide wide, flexible, inclusive and innovative opportunities for customers to engage, or influence, the governance of Queens Cross and the services we provide locally.

We will build on the existing Neighbourhood Groups and Residents Task Force (RTF) scrutiny approach to strengthen our accountability, providing us with the healthy independent challenge and assurance. This will include involving the RTF panel and introducing thematic tenant’s inspections of our anti-social behaviour services. We will use learning from what customers tell us to help us reflect on things we do well, and to identify what we need to improve on.

1. **Effective Communication Tailored to Customer Needs**

The ability to communicate effectively with our customers around anti-social behaviour complaints is intrinsically linked to our focus on providing high quality services and driving up levels of customer satisfaction. For example we know the initial response to our tenants and customers when they make an anti-social behaviour complaint is almost as important as the value of subsequent action taken to resolve the problem.

When dealing with complaints of anti-social behaviour we recognise the importance of looking at it from the customer’s point of view. Customers will be unaware of some of the complexities, time delays and other potential pitfalls of investigating complaints of this nature. We will ensure that, whenever possible, all anti-social behaviour complaints are acknowledged and investigated in accordance with Queens Cross’s agreed timescales. Furthermore complainers, any witnesses, and the person who is the subject of the complaint, will be kept informed of progress during the investigation and advised when the case has been closed. We will also carry out quarterly customer feedback questionnaires using an independent body to capture our customer’s feedback and satisfaction levels. By delivering on these commitments, we will build confidence and trust, and create relationships with our customers that will last and be mutually beneficial.

The primary objective of this work will be to ensure our tenants are aware of how seriously we take complaints of this nature; that we will never be dismissive of their problem and that we will provide a robust and informed response.

1. **Managing and Optimising Performance**

We will monitor anti-social behaviour performance and trends using both Charter and local performance indicators.

We will use our resources and services to support customers to sustain their tenancies and minimise the number of terminations, abandonments and transfers due to anti-social behaviour. We will use this information to set challenging targets and ensure we can demonstrate to our customers that we aim to continually improve our anti-social behaviour services. In addition to the SSHC and Scottish Housing Regulator requirements detailed within section 3 this will include:

* The number of abandoned properties;
* The number of notices of proceedings issued for anti-social behaviour;
* The number of Anti-social Behaviour Orders granted;
* The number of interim Anti-social Behaviour Orders granted;
* The number of court actions initiated for anti-social behaviour
* The number of evictions undertaken for anti-social behaviour

1. **Supporting our Customers with Different Needs**

We will bring partners together to identify those customers who have additional support needs. Queens Cross will explore how we best link into other services to the benefit of our customers, examples of this include:

* Recognising and increasing awareness of how poor daily living skills impact on neighbours and the surrounding environment
* Accessing pathways into Health and Addiction services
* Linking into local community groups and resources using our own Older Person Services and the Community Connectors.
* Accessing recovery networks
* Improving door management skills E.g. who the tenant gives access to their home and being responsible their visitor’s behaviour.
* Assisting tenants or customers who have additional communication needs.

1. **Developing our Staff Capacity and Knowledge and the use of technology**

Queens Cross Housing Association carry out robust training and mentoring to provide Housing staff with the knowledge and tools for tackling anti-social behaviour in our communities. We work with our partner agencies to provide specialist training e.g. Hate Crime and Domestic Violence. We ensure our housing management system is developed to assist staff with logging, actioning, investigating and resolving complaints. The Association is developing mobile working for staff and App’s for tenants to enable Anti-social Behaviour complaints to be reported.

1. **Policy Review**

We will review this policy every three years. Reviews will consider legislative, performance standards and good practice examples.

More regular reviews may be considered where, for example, there is a need to respond to new legislation / policy guidance or any recommendations from significant case reviews.

We have developed this approach in consultation with our tenants and account has been taken of representation made. Similar consultations will take place for all future reviews.

1. **Confidentiality, Data protection and Rights of Access**

All information provided by complainers, witnesses or alleged perpetrators during the course of any anti-social behaviour investigation will be treated in strict confidence and will only be discussed with other parties with the individual’s (or their appointed representative’s) prior consent.

Queens Cross Housing Association will comply with the Data Protection Act 2018 and the General Data Protection Regulation in relation to all personal information held.

The GDPR includes the following rights for individuals:

* What personal data we hold about them;
* The purposes of the processing
* The categories of personal data concerned
* The recipients to whom the personal data has/will be disclosed
* How long we intend to store your personal data for
* If we did not collect the data directly from them, information about the source
* The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
* The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
* The right to lodge a complaint or seek judicial remedy and who to contact in such instances

If a tenant wishes a copy of relevant personal information which the association holds about them, subject access requests can be requesting in writing to the Association, and we will respond within one month of this request.

Further information regarding how we process your data can be found on our website along with a Subject Access Template.

1. **Complaints**

Our aim is to get it right first time, however, where there is dissatisfaction with this Policy frame work or how we manage antisocial behaviour, customers can make a complaint.

A summary of our Complaints Policy and Procedure is available on our website and in our local offices.

We can manage antisocial behaviour using the provisions set out in the Housing (Scotland) Act 2001, as amended. The Housing (Scotland) Act 2014 introduced additional powers in relation to the management of antisocial behaviour, these along with existing measures are detailed below:

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