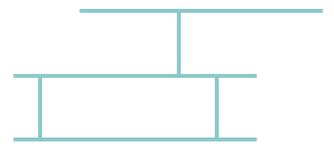


Plus Dane Housing

# Anti-Social Behaviour Policy

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## 1 Policy Statement

We understand that anti-social behaviour (ASB) can have a negative impact on people and communities. This policy sets out how we aim to prevent and respond to incidents of ASB in a consistent and proportionate way.

This policy does not include reports of ASB from those who are shared owners or leaseholders. Customers who fit into these categories would be expected to seek their own independent legal advice or contact their local authority.

If shared owners, leaseholders and non-Plus Dane customers are complaining about the behaviour of Plus Dane tenants, we would investigate in line with this policy. We assess how serious a matter is based on the behaviour type and the impact that the behaviour is having (a harm centred approach). We will work to recognise victim vulnerability and take the appropriate steps to try and reduce any risk.

We aim to act as quickly and decisively as we are able in each given situation. We seek to use a wide range of informal and legal tools, with the aim of stopping the harm to the victim/s and rehabilitating the person causing the problems.

We believe in empowering our residents and, where appropriate, encourage them to be part of managing the case. This might include asking them to manage minor issues themselves, or to seek advice from other agencies.

We recognise that resolving ASB often requires a partnership response and, where appropriate to the case, we will work with other agencies.

## 2 Policy Aims

The aims and objectives of this policy are to:

- Ensure a consistent approach to the management of ASB across our neighbourhoods for social housing tenancies.
- Comply with current legislation and good practice.
- Contribute to sustainable, diverse and balanced communities.
- Respond to those who cause ASB using appropriate and proportionate intervention, rehabilitation, support and/or enforcement with the aim of preventing ASB, promoting community protection and deterring and rehabilitating those responsible for causing ASB.
- Encourage partnership working and multi-agency working in order to develop and support victims and witnesses through what can be a very complex legal process and where appropriate use joint working to tackle ASB
- Where necessary direct victims and witnesses to the appropriate support agencies

- Help people and organisations reach a common understanding about what does and does not constitute ASB
- Use, monitor and develop tools to measure customer satisfaction and learn and shape the service in line with the feedback given, in line with the Regulator for Social Housing's new consumer standards and tenant satisfaction measures.

### **3 Legislation**

This document is produced to set out our approach to tackling anti-social behaviour (ASB) and comply with section 218(a) of the Housing Act 1996. Other associated legislation, relevant to tackling ASB, includes but is not limited to:

- The Anti-Social Behaviour, Crime and Policing Act 2014
- Housing Act 1996
- Housing Act 1988
- Civil Evidence Act 1995
- Crime and Disorder Act 1998
- Data Protection Act (GDPR) 2018
- Children's Act 1989
- Anti-Social Behaviour Act 2003
- Human Rights Act 1998
- Equality Act 2010
- Racial and Religious Hatred Act 2006
- Home Office ASB Principles
- Regulator of Social Housing Consumer Standards

There are also a number of internal policies that should be considered in conjunction with this document, including but not limited to:

- Hate Crime Policy
- Domestic Abuse Policy
- Starter Tenancy Policy
- Safeguarding Policy
- Customer Complaints and Feedback Policy

### **4 Links to Corporate Plan:**

This policy sets out to embed the ambitions of the corporate plan across our teams. Providing good quality homes, support and services for those who need them most and building resilience in our communities.

## 5 Our Approach

### 5.1 Definition of ASB

We use the definition of housing related ASB that is found within Part 1 of the ASB, Crime and Policing Act 2014:

- **Conduct capable of causing housing related nuisance or annoyance to any person.**

In addition, any of the following behaviours (as laid out in Ground 14 of the Housing Act 1988) may also be considered to meet our definition of ASB for the purpose of this policy:

- One of our homes or assets has been used for illegal and/or immoral purposes;
- A criminal offence has been committed in the locality of the home, by the tenant, a household member or a visitor to the property;
- An adult tenant or household member has been convicted of an offence at the scene of a riot.

In order for us to consider a report of ASB to be housing related it must affect our housing management function. This covers all obligations under the tenancy agreements issued by Plus Dane, linked to the property or the locality where the tenant resides.

We may take action against individuals who do not live in our homes where their behaviour affects our housing management function or Plus Dane tenants (such as if they are causing problems to our customers or colleagues). In some cases, there may be another agency that is better placed to manage the case (such as another Registered Provider, if the perpetrator is a tenant of theirs). This decision will be made on a case-by-case basis.

We will not tolerate ASB directed at our colleagues and/or contractors, whether at a home, in the locality of it, or at any other place, and will, where appropriate, take action under this policy to address any such behaviour.

### 4.2 Other definitions

Perpetrator – person accused of causing ASB

Reporter – person making a complaint of ASB

Victim – a person who has experienced nuisance, harassment, alarm, distress, or any other ASB

Anonymous complaints – we accept anonymous complaints but our enquiries and investigations may be limited depending on the nature of the complaint

Our ASB case management system uses the term complainant when referring to a victim, witness or reporter.

## **4.3 Domestic Abuse**

We may find that a report of ASB relates to domestic abuse. We recognise that there are sensitivities around such matters that we need to consider. Where the report appears to stem from domestic abuse (DA), this policy should be read in conjunction with our Domestic Abuse Policy.

Community Safety colleagues are trained in both the ASB policy and the DA policy to help identify any reports and mitigate the risk of mis categorisation of Domestic Abuse.

## **4.4 Hate Crime**

The Government defines hate crime as ‘any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic’. (‘Challenge it, report it, stop it: The Government’s Plan to Tackle Hate Crime’ HM Government March 2012). Reports of hate crime or hate incidents will be dealt with as high-risk cases of ASB and managed within the Hate Crime policy.

## **6 Noise**

We understand the impact that noise nuisance can have on individuals, especially within certain types of accommodation such as flats, but we also recognise that not all noise constitutes a nuisance and not all noise that does constitute a nuisance is deliberate.

We will, through Good Neighbour Agreements and at tenancy sign-ups, provide advice on noise in flats and we will proactively discuss floor coverings on allocating flats where there have been noise transmission issues on previous tenancies. In addition, we have developed a triage methodology for identifying whether a noise report should be handled under the ASB policy or the good neighbourhood management policy, so that we treat noise reports consistently and proportionately.

We will ensure that we record accurately and consistently reports of noise, and that footage is stored safely and is available to use where it is appropriate to take action.

### **Reporting ASB**

A report of ASB can be made by an individual or someone acting on their behalf in the following ways:

By telephone

In person at any of our offices

In writing

Online through our website [www.plusdane.co.uk](http://www.plusdane.co.uk),

email [customer@plusdane.co.uk](mailto:customer@plusdane.co.uk),

social media or the customer portal

When we receive a report of ASB we will, as part of our investigation, always try to contact the reporter to find out as much information as we can.

It is important therefore that all reporters recognise the importance of working with us to resolve their report as failure to do so may lead to the case being closed due to lack of contact.

All reporters have a responsibility not to make malicious reports about neighbours, visitors or anyone engaged in lawful activity.

We take malicious reporting very seriously and will take action that is appropriate and proportionate against anyone found to be doing so.

We prioritise reports of ASB that are most serious to ensure any risk of harm is managed quickly and appropriately. We use a triage system that considers the type of behaviour reports and the impact it is having, and we categorise cases as level 1, level 2 and level 3. The category allocated determines the response given.

<b>Risk level</b>	<b>Type of behaviour</b>	<b>Plus Dane target response</b>
Level 1 High Risk	Risk of personal harm Threats of or actual violence, Domestic Abuse, Hate Crime, Drug production	within 1 working day of receiving the report
Level 2 Medium Risk	Verbal abuse, Alcohol related nuisance Allegations of prostitution	within 3 working days of receiving the report
Level 3 Low Risk	Unreasonable noise Animal nuisance Vehicle nuisance Garden nuisance	within 5 working days of receiving the report

There may be matters that prevent us from achieving these timescales that are out of our control, such as reporter availability due to other commitments. An explanation will be recorded on the housing management system in these cases.

A case may be re-categorised during the course of our case management if we determine, for example that the behaviour and/or risk has become more serious.

We agree an action plan with reporters and keep them updated throughout the case. The action plan will be updated to reflect new information or incidents

related to the case. The action plan will show decisive actions and a timeline for communication.

### **Neighbour Disputes**

We may receive reports relating to disputes between neighbours. Examples include arguments over boundaries, use of social media etc. It is inevitable that we are sometimes going to live next door to people that we do not get along with. We believe that this is something that the parties should try and resolve themselves and therefore we are unlikely to categorise this as ASB.

Exceptions would occur where there is a clear victim in the situation, or where the behaviour of the parties in dispute is affecting the wider community. We may refer parties in dispute to mediation services, as a way of ensuring the matter does not escalate into something more serious.

While we do not classify neighbour disputes as ASB, in cases where the dispute escalates to a point where it affects other parties unrelated to the dispute, we may consider the use of legal action against one, both or all parties. We will always consider the views of the reporter, but we are ultimately responsible for:

- Deciding if a report is ASB;
- Deciding how it should be categorised;
- Agreeing the most appropriate course of action in a case – not every report will result in formal action. For example, it may be that we decide that a report should be dealt with informally via the good neighbourhood management policy or by making referrals for support.

### **Expectations of our customers**

Irrespective of the types of tenancy or occupancy agreement, there are a number of standard requirements relating to ASB placed upon our customers.

They are responsible for the behaviour of every person (children and lodgers), living in or visiting their home.

This includes in the home, on surrounding land, in communal areas and in the wider locality.

This responsibility remains with the Plus Dane customer, even if they have not encouraged or condoned the behaviour.

Each type of tenancy agreement will have conditions relating to expected behaviour. These vary across the agreements but will broadly cover the following expectations, that our tenants (or household members/visitors):

- must not use or threaten to use menacing, abusive or violent behaviour nor cause a nuisance, annoyance or disturbance towards anyone living in, visiting and engaging in a lawful activity in the locality of the property.

- must not commit or threaten any form of harassment on the ground of race, colour, religion, sex, disability or sexual orientation which may, or is likely to, interfere with the peace and comfort, or cause offence to anyone living in, visiting or engaging in a lawful activity in the locality of the property.
- must not use the premises or allow them to be used for immoral or illegal purposes.
- must not engage in any form of criminal activity.

## **7.1 Expectations of those who report ASB**

The successful investigation and remedy of reports of anti-social behaviour relies on the cooperation of the person reporting. In particular we will expect anyone reporting anti-social behaviour to:

- Give honest, accurate and precise information around the dates, times and details of incidents reported. Where appropriate we will issue diary sheets to assist with this.
- Not retaliate or do anything that may worsen the situation or provoke further acts of anti-social behaviour.
- Consider other methods to resolve ASB where reasonable including mediation.
- Cooperate with requests for further information in a timely manner.
- Where a report is of a low-level issue such as occasional noise, we may expect the person reporting to have attempted to resolve the matter themselves before we will agree to intervene.

## **Risk and Vulnerability**

We take a victim-centred approach aimed at harm-reduction, to tackling ASB, including prevention and early intervention. This approach engages with victims in a way which prioritises listening and systematically focuses on their safety, rights, well-being, expressed needs and choices.

### **6.1 Victim Support / Vulnerability**

We work to identify and address victim vulnerability at various stages throughout our casework:

- All reports are triaged, and any vulnerabilities are identified by way of an early assessment as part of the initial ASB report
- The allocated case officer will complete a full risk assessment of the person making the report, based on information gathered at the initial interview and updated where appropriate if circumstances change. The results will guide the case management response and the steps we take to support the reporter and other victims associated with this case.

- We continue to review the risk assessment throughout the case and take necessary action if the risk level changes.
- Irrespective of any other vulnerability, we will, as a matter of course, carry out a risk assessment where the reporter is part of a group likely to be adversely impacted by or have a greater risk of anti-social behaviour as detailed in our Equality Impact Assessment. This will include consideration of whether the issues of anti-social behaviour could be part of a wider pattern of behaviour within the community that could affect others from within that group.

## **6.2 Perpetrator Support / Vulnerability**

We recognise that those causing ASB may also be vulnerable and/or have a support need that is exacerbating the behaviour. Whilst not an excuse, we understand that leaving any needs unaddressed is likely to prolong the harm to all parties. In addition, helping the perpetrator to address a need can stop the ASB without having to resort to legal action.

We will consider the needs of the perpetrator at various stages throughout a case. We will consider whether we can offer any further support and/or whether a referral should be made to another agency or multi-agency group.

We will complete a justification exercise when taking legal action, in order to ensure our action is a proportionate means to a legitimate aim. This assessment considers the needs of the perpetrator. In addition, where we know or believe the perpetrator to have a protected characteristic, we will consider the Equalities Act when taking legal action.

When managing cases involving perpetrators with support needs, we adopt a twin-track approach, meaning that enforcement and intervention can be taken at the same time. Our priority is to stop the ASB and harm to reporters/victims. A support need will not stop or delay us from taking the appropriate action. Non-availability of required support and refusal or non-engagement from the perpetrator will also not be allowed to prevent or delay action being taken, where necessary.

## **Witness Support**

Whilst our preference is always to deal with ASB through informal methods, legal action will sometimes be required. To be able to take legal action we require evidence and often this will come from reporters. We appreciate that this can be daunting and aim to make the witness feel as supported as possible during the process of giving evidence.

Depending on the needs and the appropriateness, we may offer the following support to our witnesses:

- Practical advice on court hearings and giving evidence;
- Pre-court visits;

- Logistical support relating to travel and attendance;
- Following court attendance, we explain the outcomes and next steps.

Even if a reporter does not have a high level of vulnerability, we will offer some support as a matter of course, which may include:

- Managing expectations fairly and only making promises that we can keep;
- Ensuring the reporter has a point of contact;
- Maintaining regular contact.

## **Safeguarding**

We recognise that employees dealing with ASB are likely to come in to contact with children and adults for whom there are concerns about safeguarding issues.

- We will actively participate in local multi-agency arrangements for safeguarding children, young people and adults.
- Awareness of, and sensitivity to information sharing protocols and data protection is crucial however, safeguarding concerns override the need for confidentiality in respect of relevant statutory authorities as long as all activity is properly recorded.
- All Plus Dane colleagues have a duty to act in relation to safeguarding concerns. All colleagues will comply with the requirements of the Plus Dane Safeguarding Policy at all times.
- All Plus Dane colleagues are required to complete Level 1 safeguarding training as part of the suite of mandatory training courses that the organisation offers.

## **Young People**

Where appropriate we will take direct action against members of our tenants' households or visitors who are between the ages of 10 and 17 and perpetrating ASB. We will, where possible, seek to engage the involvement of the young person's parent or guardian. We will where appropriate, take action against parents/guardians where a young person is in their care, preventing and reducing ASB.

Our preference is to prevent ASB from occurring in the first place. We endeavour to achieve this through the following means:

- Obtaining full information about our customers at the pre-tenancy stage.
- Having a robust sign-up process which clearly outlines customer responsibilities.

- Using starter tenancies to monitor the conduct of tenants at the start of their tenancy, allowing us to take swift action to address any early breaches.
- Using our internal support teams to provide assistance and practical help to remove or reduce the issues that are leading a person to cause ASB, including our Floating Support services, Welfare Team and our housing management teams.

## **14 Professional Witnesses and the use of CCTV and the Noise App**

Where appropriate, consideration will be given to the use of professional witnesses and/or surveillance methods such as CCTV to gather or support evidence of ASB. This includes consideration of the use of Ring doorbells as evidence.

We also subscribe to the noise app which is a telephone app that residents can download to allow them to record noise as it occurs.

The officer investigating the case will listen to all noise app submissions and these will be stored along with the case investigation notes and referenced as appropriate. Footage from Ring doorbells which is submitted as evidence will also be stored to be used as part of the case investigation evidence.

## **15 Categories of Action**

### **15.1 Informal action**

We seek to resolve ASB at the earliest possible stage, using non-legal remedies, where possible, including, but not limited to:

- Providing advice and assistance to reporters at an early stage
- Interviewing the perpetrator
- Verbal and written warnings
- Making referrals for support
- Using mediation services at an early stage
- Using Acceptable Behaviour Agreements and Parenting Agreements
- Using Good Neighbour Agreements
- Signposting to diversionary activities
- Undertaking security measures aimed to design out crime

We have a separate Good Neighbour Guide and a Good Neighbour Management Agreement and procedure which we will seek to introduce in areas where there are repeated incidents of minor nuisance and inconsiderate

behaviour. This is particularly appropriate where this behaviour is not restricted to a single identifiable perpetrator but is a general pattern of behaviour affecting the community. This includes behaviour such as fly-tipping, inconsiderate parking, noise and dog-fouling.

Customers will be clearly told if their report is being handled within the Good Neighbour Management Procedure or whether it is being dealt with under the ASB policy.

### **15.2 Formal Action**

We have a range of actions available to address ASB. We do not adopt an incremental approach and will take the action that is believed to be proportionate and that has a genuine chance of resolving the matter.

We believe in working with our residents to empower them in their ASB cases. If the matter is appropriate, we may require residents to take action themselves to resolve the matter. This may include providing them with advice and guidance about how to approach the neighbour and discuss the matters with them. We will only take this approach when the behaviour is minor and there is no perceived risk.

### **15.3 Legal action**

We recognise that ASB has the potential to cause serious detriment to others living or working in our communities, and that strong enforcement action is likely to be warranted, for example in a Level 1, high risk case.

To be able to take legal action we require evidence to prove to the Court that the ASB has occurred, and it is proportionate to grant the order we are requesting. This evidence often comes from residents who have experienced the ASB. Without this evidence we may not be able to take action. In addition, while we can ask the Court to make an Order, it is ultimately their decision whether to do so or not and the Court needs to be satisfied that the threshold, which is “more likely than not on the balance of probabilities” is met, taking into account all of the evidence put before it.

The type of action we take will be determined on a case-by-case basis, taking all of the circumstances into account, including the quality of evidence available and of witness availability and also including the impact on the wider community and having due regard to the Human Rights Act 1998 and Equality Act 2010.

### **16.4 Proceedings against the tenancy.**

This action will depend upon the tenancy type concerned but may include proceedings under s21 of the Housing Act 1988 as outlined in Plus Dane’s Starter Tenancy policy or using the discretionary or mandatory grounds for ASB found in Schedule 2 of the Housing Act 1988 (Ground 14 and 7(a)). Where a mandatory route is taken, the tenant has a right to appeal the decision.

Other tenancy proceedings may be taken against another occupancy agreement such as a licence or a lease.

There may be situations where other agencies have the best tool to address the problem and we will work with that agency to support that action.

## **16.5 Other Crime**

We may take action against tenants, or on behalf of our tenants for criminal behaviour but will do so in a manner supplementary to police action, not in place of it. Therefore, we reserve the right to close a case if the reporter refuses to engage with the police.

## **17 Working in Partnership**

In order to enable effective information exchange and partnership working, we will regularly attend partnership meetings allowing us to create clear action plans for dealing with issues that require a partnership response. The types of meetings we will attend include (but are not limited to).

- Local Authorities
- Police Services
- Fire and Rescue Services
- NHS Medical / Mental Health Teams
- Social Care (Adult/Children)
- Youth Offending Team/Probation
- Third or Voluntary Sector service providers

### **17.1 Partnership meetings**

To enable effective exchange of information we attend partnership meetings to develop action plans that require a partnership response. Examples of this are:

- arranging or participating in multi-agency case conference meetings to resolve complex cases
- participating in local Community Safety Partnership meetings with the local authority police and other RSL's to develop common standards and approaches to ASB, Domestic Abuse and Hate Crime.
- participating in local procedures for an ASB case review

## **18 Information Sharing**

The power under section 115 of the Crime and Disorder Act 1998 and the Data Protection Act 2018 allows agencies to share information for the detection and the prevention of crime and anti-social behaviour. We are signatories to a

number of information sharing agreements to allow us to lawfully share information that is necessary for the purpose of detecting and tackling ASB and crime.

Where we do share information with other agencies, we will ensure that the transfer of this information is done safely, the information is stored appropriately, it is not shared with a third party without permission (unless required by law) and is subject to an appropriate retention schedule. The same principles will apply where we receive information for agencies.

When we receive subject access requests we will deal with these lawfully and with appreciation of the ICO guidance in relation to these requests.

We are legally obliged to share information with a third party, where a child or an adult may be at risk. In these cases, we may be required to share information without seeking consent and we will refer to our Safeguarding Policy.

## **19 Confidentiality**

Where a reporter asks for us to keep their details/identity confidential we will explain that this will greatly impact on our ability to take action. We cannot take action without informing the perpetrator of the detail of the report made against them and often the circumstances of the incident will make clear to them who the reporter is. If the reporter is fearful of repercussions, we will explain how we are able to support and protect them to encourage them to allow us to continue with our actions.

There may be some information that a reporter tells us that we cannot keep confidential, even if they wish us to. This would include information relating to criminal behaviour and safeguarding issues. Where appropriate we will tell the reporter that we need to share the information and who with.

## **20 Closing Cases**

There is no set time frame for closing a case; it will depend on the nature of the issues involved. If we decide to close a case, the reporter will be consulted beforehand, and we will explain the reasons why the case should be closed. We will listen to any reasons the reporter has on why the case should not be closed and will advise them accordingly.

Whilst there is no set time frame for closing a case, we will review open cases on a regular basis to ensure that they are progressing as expected.

Generally, we will close a case if:

- We are satisfied we have done everything we reasonably and proportionately can to resolve the complaint.
- The ASB has been resolved or it has stopped.

- After an initial investigation, the behaviour cannot be reasonably regarded as ASB.
- There is insufficient evidence to take action.
- Reporters have not worked with us to gather evidence.

If a reporter continues to make reports about issues that we have already explained we do not deal with, or if we consider the reports to be malicious and/or having an unreasonable drain on our resources, we may consider taking action in line with our Unreasonable and Vexatious Behaviour Framework

## **21 Assurance**

### **21.1 Roles and Responsibilities**

**Director of Communities** is responsible for ensuring that this policy is communicated to the relevant business areas and embedded within service delivery. They will review cases that are escalated by way of complaints or appeals to ensure that policy has been applied. They are also responsible for the KPIs in relation to customer satisfaction.

**Community Safety Manager** is responsible for supporting the team of Tenancy Enforcement Officers in day-to-day case management, ensuring that policy is applied, and the cases are managed within timescales and is also responsible for maintaining the wider stakeholder and partner relationships that underpin this policy.

**Tenancy Enforcement Officers** will investigate reports of anti-social behaviour. Following the policy and related procedures to ensure cases are appropriately managed and those involved, whether victims or perpetrators are well supported in the process.

### **21.2 Performance**

We will closely monitor the quality of the service that we provide in relation to ASB. We will do this by:

- Ensuring service standards are being met via operational manager case reviews
- Completing customer satisfaction surveys (where possible)
- Ensuring vulnerability assessments are completed and all actions are accurately recorded.
- Conducting regular reviews of ongoing cases, to assess progress and identify any barriers.

Externally, our approach to handling reports of anti-social behaviour is measured as part of the Tenant Satisfaction Measures by the Regulator for Social Housing and this is reported internally to our Purpose Committee which is part of the organisation's governance structure.

The numbers and types of anti-social behaviour are also reported to Purpose Committee as are the remedies and actions taken to address anti-social behaviour.

We also refer cases to the Local Authority for Community Trigger reviews where appropriate and utilise external peer reviews of cases through organisations such as Resolve where this is appropriate.

All cases are dealt with in accordance with Plus Dane's Safeguarding Policy and processes where an individual, reporter or perpetrator, may require safeguarding as part of the management of the case.

## **22 Colleague Training**

We provide colleagues with the necessary training required to be able to effectively deal with ASB and related issues. This training will be regularly refreshed and updated to ensure officers are kept abreast of changes to legislation or policy.

Training needs are regularly explored with officers during one-to-one meetings, annual performance and development reviews and team meetings and in line with legislation changes and when good practise or learning as a result of a complaint or ASB case review is identified.

## **23 Complaints and Feedback About the ASB Service**

Reports of ASB should be reported via the ASB reporting tools listed within this policy.

We welcome any feedback from our customers and partners, both positive and negative about the handling of their report. This can be sent directly to us by:

By email to [complaints@plusdane.co.uk](mailto:complaints@plusdane.co.uk)

Online report via our website

By telephone to 0800 169 2988

In writing

Customer Portal

Any feedback which is considered to be a complaint will be dealt with in accordance with our Customer Complaint and Feedback Policy.

## **24 ASB Case Review**

We are also part of the ASB Case Review process in each of the local authority areas in which it operates. This process allows residents to request a review of their ASB case, should they feel that it has not been dealt with or resolved appropriately. Each local authority area has a different process. The charity ASB Help has a directory which can be used to identify the correct process to use for the resident concerned: <https://asbhelp.co.uk/community-trigger-directory>

## **25 Review**

This policy will be reviewed every 3 years to ensure compliance with national best practice and legislation. This review may take place earlier if a significant change to legislation or policy occurs.

Responsibility for reviewing this document sits with the Community Safety Manager.

## **26 Equality Impact Assessment**

An Equality Impact Assessment undertaken on this Policy has indicated there are no negative impacts arising from this Policy based on a customer's race, religion, disability, gender or gender identity, sexual orientation, marital or civil partnership status, pregnancy, or age.

## **27 Modern Slavery & Human Trafficking**

Plus Dane has a zero-tolerance approach to human trafficking and modern slavery. As part of our commitment to the Modern Slavery Act, when we visit and interact with our tenants, during these visits we will consider signs of modern slavery and human trafficking, as well as any other welfare concerns which tenants or members of their household may have. Where we have concerns, we will raise this concerns through our wider safeguarding approach.