



Anti-Social Behaviour
Policy



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Version number	
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Author Title & Issuing Department	Regional Head of Communities, Communities Team
Target Audience	All emh colleagues, website

Approved By	Custer Reader Panel 10 December 2025 Resident Influencing Committee 23 January 2026 EMT members
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Review Date	March 2029

Links to Regulatory Standards – Economic/ Consumer Standards	Neighbourhood and Community Standard Registered providers must work in partnership with appropriate local authority partners, the policy and other relevant organisations to deter and tackle Anti-Social Behaviour in the neighbourhoods where they provide social housing.
Outcomes for Customers	The policy sets out how emh will respond to reports of Anti-Social Behaviour and what action may be taken.
How were tenants, residents and service users involved in the review/development of this document	Customers were consulted in December 2025 and their feedback taken into account
Training Provision	Heads of Service across the business will be responsible for cascading the policy to their teams ensuring all colleagues understand and adopt the principles of the policy.
Links to the Business Plan	
Links to Key Values	Clarity: sets out clearly how emh will deter and tackle Anti-Social Behaviour. Accountability: makes clear what is our responsibility, what lies with tenants and with other third parties.

Version Control



Version	Revision Date	Author: Job Title	Change Description
4	March 2025	Regional Head of Communities	Updated in line with the Housing Ombudsman Recommendation March 2025. ▶ We will regularly review the agreed action plan with the customer, this will include how often we will contact the customer in all open cases, this will include preferred method of contact. Each case opened will be opened with a named case handler.
5	January 2026		New policy document format. Additional information about reporting and case management



1. Introduction

Introduction to the topic.

- 1.1 We understand that Anti-Social Behaviour can have a negative impact on people and communities, and we want people to feel safe, and enjoy their homes.
- 1.2 We are committed to effectively tackle and deter Anti-Social Behaviour. We will:
 - Take reports seriously.
 - Ensure each report is assessed on its own merit when determining whether it is classed as Anti-Social Behaviour.
 - Recognise that Anti-Social Behaviour can have a detrimental impact upon individuals and communities and as such, we are committed to tackling Anti-Social Behaviour through taking reasonable and proportionate action in dealing with disruptive residents and any other visitors causing Anti-Social Behaviour within emh properties.
 - Investigate reports of Anti-Social Behaviour, and, where there is clear, evidence, reasonable and proportionate action will be taken. We can only achieve this with the commitment of customers and as such, it is important to receive reports of anti-social behaviour as part of the case management process.
 - Demonstrate leadership, accountability, and commitment in working with partners to tackle and deter hate crime, domestic abuse and Anti-Social Behaviour so that we all fulfil our responsibilities.
 - Ensure staff are well-trained, have the knowledge and confidence to identify and investigate reports of Anti-Social Behaviour and work collaboratively alongside appropriate agencies who are leading on such cases.
 - Clearly explain to all new customers at the sign up of their tenancy and new tenant visits, the terms of their tenancy that relate to Anti-Social Behaviour, so that expectations and consequences are made clear.
 - Signpost customers to support services where appropriate.
 - Adopt a victim centred approach and support perpetrators of Anti-Social Behaviour with the view of resolving Anti-Social Behaviour reports.
 - Tackle Anti-social behaviour whilst meeting our duties under the Equality Act (2010). We will make our services accessible to all customers and will take steps to overcome barriers when reporting anti-social behaviour. For example, this may mean making reasonable adjustments to meet the customer's specific need(s).



- Use good practice and review lessons learned to minimise risk of recurrences, develop policy and procedure and improve residents' satisfaction of our Anti-Social Behaviour service.
- Where the behaviour is deemed not to be Anti-Social Behaviour, advice will be given to enable self-resolution and managed outside of the Anti-Social Behaviour policy. If we continue to receive repeated reports of non-Anti-Social Behaviour, we will refer the customer back to the original advice given.

The purpose of the policy:

- 1.2 The purpose of this document is to inform tenants, leaseholders, stakeholders and the wider community of emh's policy when managing reports of Anti-Social Behaviour about its tenants and making clear the standards of behaviour expected. It also sets out how we will work to deter and tackle Anti-Social Behaviour in neighbourhoods where we provide social housing including the full range of tools and legal powers we may use.

Why emh is issuing the policy.

- 1.3 emh is regulated by the Regulator of Social Housing and one of the key requirements we must meet is the Neighbourhood and Community Standard. This documents supports how we meet this standard and in particular sets out how we:
- Work co-operatively with customers, other landlords and relevant organisations to take reasonable steps to ensure the safety of shared spaces.
 - Co-operate with relevant partners to promote social environmental and economic wellbeing of residents.
 - Work in partnership with appropriate professionals and relevant organisations to deter and tackle Anti-Social Behaviour and hate incidents within our communities.

Relevant legislation:

- 1.4 This document is produced to set out our approach to tackling Anti-Social Behaviour and comply with section 218(a) of the Housing Act 1996. Other associated legislation, relevant to tackling Anti-Social Behaviour, includes but is not limited to:
- ▶ The Anti-Social Behaviour, Crime and Policing Act 2014
 - ▶ Housing Act 1996
 - ▶ Civil Evidence Act 1995
 - ▶ Crime and Disorder Act 1998
 - ▶ Data Protection Act (GDPR) 2018
 - ▶ Housing Act 1988



- ▶ Anti-Social Behaviour Act 2003
- ▶ Equality Act 2010

2. Definitions and Scope

Definition of Anti-Social Behaviour

- 2.1 emh uses the definition of housing related Anti-Social Behaviour that is found within Part 1 of the Anti-Social Behaviour, Crime and Policing Act 2014 - “Conduct capable of causing housing related nuisance or annoyance to any person”

Examples of anti-social behaviour

- 2.2 Because we take a harm centred approach to defining anti-social behaviour, taking into account the behaviour and the impact, we cannot produce an exhaustive list of what we consider to be anti-social. The following are the categories we use for reporting purposes and provide some guidance on the types of behaviour we are likely to consider as Anti-Social Behaviour:

- ▶ Harassment/intimation/verbal abuse/threatening behaviour
- ▶ Domestic abuse
- ▶ Physical violence
- ▶ Hate crime based on age, race, sexual orientation, gender, disability, etc
- ▶ Vandalism
- ▶ Alcohol related nuisance
- ▶ Unreasonable noise
- ▶ Pet and animal nuisance
- ▶ Garden related nuisance
- ▶ Litter/rubbish/fly tipping
- ▶ Graffiti
- ▶ Drug related nuisance/ substances misuse and supply

Examples of behaviour that may not be anti-social behaviour

- 2.3 Different people have different expectations, tolerances and perceptions. There may be times where a report is made that the complainant considers to be Anti-Social Behaviour but that does not meet our definition. The decision as to whether something is anti-social behaviour will be made by us on a case-by-case basis. The reasons we may decide something is not Anti-Social Behaviour include:

- ▶ The behaviour does not meet our definition of Anti-Social Behaviour and/or is not affecting our housing management function;
- ▶ There is no pattern of behaviour and the incident is minor;
- ▶ The behaviour is not unreasonable. The types of behaviour likely to fall under this category includes:

- General household or living noise (babies crying, people talking and walking in their homes, closing doors and windows, vacuuming, and using white goods at reasonable times, working from home in a computer-based role);
- Carrying out DIY at reasonable times;
- Cigarette and cooking smells;
- Isolated incidents of noise, loud music;
- Isolated incidents of loud shouting and arguing;
- Reasonable dog barking and cats defecating;
- Mowing of lawn or other garden maintenance at reasonable times;
- Children playing (as long as the 'playing' does not include behaviour that could be reasonably considered as anti-social behaviour);
- Barbeques and bonfires
- Parking disagreements (if the other driver is parking in accordance with all contractual / legal requirements);
- Motorbike / car engines starting / running
- Minor personal conflict such as 'dirty looks', the positioning of refuse bins, personal dislikes, personal relationship breakdowns, or children falling out with each other;

Scope and associated policies

- 2.4 In order for emh to consider a report of Anti-Social Behaviour to be housing related it must affect our housing management function.
- 2.5 We may, therefore, take action against non-tenants / customers where their behaviour affects our housing management function (such as if they are causing problems to our staff or customers). In some cases, there may be another agency who 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.
- 2.6 We will not tolerate Anti-Social Behaviour directed at our staff and/or contractors, whether at a customer's property, in the locality of it, or at any other place, and will, where appropriate, take action under this policy to address any such issues.
- 2.7 We may find that a report of Anti-Social Behaviour is as a result of domestic abuse. We recognise that we must be sensitive to such matters. Where the report appears to stem from domestic abuse, this policy should be read in conjunction with our domestic abuse policy.
- 2.8 Hate crime is a serious form of Anti-Social Behaviour. Where a report of Anti-Social Behaviour appears to represent a hate crime, this policy should be read in conjunction with our hate crime policy.



- 2.9 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 Anti-Social Behaviour. 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.
- 2.10 Not every allegation reported to emh will be categorised as being anti-social behaviour; some types are everyday living noises or lifestyle differences rather than anti-social behaviour and therefore may not be investigated under the terms of this policy. For further information relating to the above, please see the emh Neighbourhood Management Policy.
- 2.11 We believe in empowering our customers 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.

3. Specifics of the Policy

Reporting

- 3.1 Anyone can report Anti-Social Behaviour directly to us over the phone, by email, via our website, in writing or in person.
- 3.2 When we first receive a report of Anti-Social Behaviour we'll take details of what has happened and consider:
- Severity of the incident
 - Duration
 - Time of Day
 - Intentionality
 - Frequency
 - Impact of individuals and the community
 - History of previous issues
- 3.3 We'll then consider whether to deal with the report through our Anti-Social Behaviour, Hate Crime, Domestic Abuse or Neighbourhoods policy. We will always take into account the views of the complainant, but we are ultimately responsible for:
- ▶ Deciding if a report is Anti-Social Behaviour;
 - ▶ Deciding how it should be categorised;
 - ▶ Agreeing the most appropriate course of action in a case.



- 3.4 If the Anti-Social Behaviour reported is a crime, we would expect customers to report it to the police and engage with them to investigate the report.
- 3.5 If we are dealing with a report as Anti-Social Behaviour, we will complete a risk assessment to consider the risk to the customer, their household and the local community

Risk Assessment

- 3.6 For cases that are to be considered under this policy we have adopted a harm centred approach to case management which includes an initial report and assessment. Through a scoring system that considers the type of behaviour and the impact that it is having, we categorise cases as high, medium or low risk. The category allocated determines which team within emh homes manages the case, as well as the response that is given.
- 3.7 The table below indicates the behaviour that falls under each category and the response time:

Case Severity	Examples of behaviour	Response times
High Risk (likely to include matters where there is a genuine risk of physical or psychological harm)	Threats of violence, actual violence, Hate Crime, Arson, Cuckooing, or matters where the victim/s has high levels of vulnerability	Within 24 hours
Medium Risk	Drug related issues, vandalism, other criminal activity and nuisance associated with groups of persons	Within 5 working days
Low Risk	Noise, pets and animal nuisance, Garden nuisance, Litter/rubbish/fly tipping	Within 5 working days

- 3.8 A case may be re-categorised during our case management if we determine, for example, that the behaviour and/or risk has become more serious. We may also re-categorise the case for response under our Neighbourhood policy.
- 3.9 It may not be possible to achieve these target response times, especially where it has not been possible to contact the complainant or the other party. Where the other party does not engage, we will continue with our investigations as set out in the Anti-Social Behaviour procedure.

Case Management



- 3.10 We'll advise customers who will handle their Anti-Social Behaviour case and aim to agree an action plan. We'll keep customers updated as agreed with the customer. We expect customers to report any new incidents to us.
- 3.11 We won't disclose customer details to the other party without consent, if we take legal action on a case, we may not be able to progress further if customers are not prepared to attend court as a witness. Customers should be mindful we are not able to guarantee anonymity if the reported issues are between neighbouring households for example.
- 3.12 After we've taken all reasonable steps to deal with the Anti-Social Behaviour reported, we'll consider closing the case. We'll attempt to contact the customer and explain our reasons before doing so.

Vulnerability

- 3.13 We work to identify and address vulnerability at various stages throughout our casework:
- ▶ An initial risk assessment is completed when a complainant makes an report of Anti-Social Behaviour.
 - ▶ The allocated officer will complete a full risk assessment once complete details have been obtained from the complainant. The results will guide the case management response and the steps we take to support the complainant.
 - ▶ We continue to review the risk assessment throughout the case and take necessary action if the risk level changes.
 - ▶ Where a complaint is made against someone who we know, or suspect is vulnerable, emh will make efforts to assist them in engaging with support services. However, it will be made clear that failure to engage with such services and the continuation of the Anti-Social Behaviour may lead to formal action being taken against them. emh will not accept vulnerability as a reason for a perpetrator to continue to behave in an anti-social manner.
- 3.13 We will endeavour to offer support and signposting as part of our case management process, which may include:
- ▶ Managing expectations and not making promises;
 - ▶ Ensuring the complainant has a point of contact;
 - ▶ Maintaining regular contact until the case is closed.

Safeguarding



- 3.14 Safeguarding is everyone's business, and we all have a part to play in protecting the most vulnerable members of our community.
- 3.15 We recognise that employees dealing with Anti-Social Behaviour are likely to come in to contact with children and adults for whom there are concerns about safeguarding issues. It is not for the investigating officer to decide as to whether there are safeguarding concerns, but it is their duty to report anything which they believe is a cause for concern.
- 3.16 We will actively participate in local multi agency arrangements for safeguarding children, young people and adults.
- 3.17 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. Information on reports of safeguarding concerns will not be shared with those making complaints.
- 3.18 All emh homes employees have a duty to act in relation to safeguarding concerns. All staff will always comply with the requirements of the following policies in relation to safeguarding:
- emh Group Safeguarding Adults at Risk policy
 - emh Group Children Young People Safeguarding policy
 - Hate Incident or Hate Crime Policy

Supporting Complainants and Perpetrators of Anti-Social Behaviour



- 3.19 emh will consider the needs of the victim and alleged perpetrator at various stages throughout a case. emh will offer support to victims and perpetrators, and with consent, referrals will be made to health and wellbeing professionals and charities.
- 3.20 emh will complete a proportionality assessment when taking legal action to ensure that action is reasonable and proportionate. In addition, where we know or believe the perpetrator to have a protected characteristic, an Equality Impact Assessment will be completed.
- 3.21 Where there is a report of hate crime, we will work the Police and any supporting organisations to ensure the victim receives the necessary support.
- 3.22 Where there is a report of domestic abuse and the victim wishes to remain in their residential property, we will work with the Police and any domestic abuse organisations to request additional safety measures to be installed to secure the property. Referrals will also be offered to specialist charities.
- 3.23 In the most serious of cases where there is an immediate risk to life that is supported by the Police, we can consider interim the appropriateness of offering interim accommodation and/or an emergency transfer.

Witness Support

- 3.24 Whist our preference is always to deal with Anti-Social Behaviour 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 complainants. We appreciate that this can be daunting and aim to make the witness feel as supported as possible.
- 3.25 Where we require witnesses to attend court, we will explain fully what information will be shared to the parties and Court, and what is expected when the witness attends court. We will provide witnesses with support throughout these proceedings

Tools and Powers to tackle Anti-Social Behaviour

- 3.26 Under the Anti-Social Behaviour, Crime and Policing Act 2014, emh have a range of tools and powers available to address Anti-Social Behaviour and will take the action that is proportionate and that has a genuine chance of resolving the matter.
- 3.27 The list below outlines, but is not limited to, the tools and powers available to us. However, the use of these tools are subject to the alleged preparators housing type and nature of the issues.

The Non-legal interventions include:	The legal interventions include:
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<ul style="list-style-type: none"> • Verbal and written warnings • Good Neighbour Agreement • Acceptable Behaviour Contracts (ABC) • Mediation • Undertakings (agree to certain actions and behaviours) <p>Note: All non-legal interventions are recorded and monitored.</p>	<ul style="list-style-type: none"> • A Part 1 Anti-Social Behaviour, Crime and Policing Act 2014 Injunction • Proceedings against the tenancy. This action will depend upon the tenancy type concerned but may include proceedings under s21 of the Housing Act 1988; or using the discretionary or mandatory grounds for Anti-Social Behaviour found in Schedule 2 of the Housing Act 1988 (Ground 14 and 7(a)). We will ensure that the notices are served in the correct manner and, where a mandatory route is taken, the customer has a right to appeal the decision. • Proceedings against another occupancy agreement such as a licence or a lease. • In some situations, we may consider that the most effective tool to tackle the issues is not one we have legal recourse to (such as the Closure Order). In these circumstances we will work with the partner agency seeking the order and support them in this action. <p>Note: Any legal interventions will only be taken once an Equality and Impact Assessment has been completed and these assessments deem legal action appropriate and proportionate.</p>
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3.28 Where Anti-Social Behaviour endangers life or property and requires immediate legal protection, urgent action will be taken. Court action can include injunctions and ultimately Possession Proceedings.

3.29 Where a complainant makes a report of Anti-Social Behaviour but will not allow emh to pursue the complaint with the alleged perpetrator, no action can be taken, and the case will be closed. Where there is insufficient evidence provided to confirm the complaints are probable, emh will not be able to take enforcement action.

Anti-Social Behaviour Case Review (formerly Community Trigger)

3.30 The Anti-Social Behaviour Case Review (formerly Community Trigger) introduces a right for victims, or victims' representatives to ask local agencies to review how they have responded to the previous Anti-Social Behaviour complaints and consider what further action might be taken where the behaviour persists.

3.30 Further information can be found on our website www.emh.co.uk

Working in partnership

3.31 Partnership working is essential to achieving success in dealing with Anti-Social Behaviour. We will work in partnership with a variety of organisations across all districts where we own and manage homes including, but not limited to:

- ▶ District and County Councils
- ▶ Police Services
- ▶ Fire and Rescue Services
- ▶ NHS Medical / Mental Health Teams
- ▶ Social Care (Adult/Children)
- ▶ Youth Offending Team/Probation
- ▶ Third party or Voluntary Sector service providers
- ▶ Refuge and other Domestic Abuse support services
- ▶ Substance misuse support services

3.32 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):

- The Multi Agency Risk Assessment Committee (MARAC)
- The Multi Agency Public Protection Arrangements (MAPPA) meetings
- Joint Action Group Meetings
- Vulnerable People and Places Forums

Information sharing

3.33 emh are party to information sharing agreements to allow us to lawfully share information that is necessary for the purpose of detecting and tackling Anti-Social Behaviour and Crime.

3.34 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 from other agencies.

3.35 When we receive subject access requests we will deal with these lawfully and with appreciation of the Information Commissioner's Office guidance in relation to these requests.

Confidentiality

3.36 Where a complainant 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 complainant is. If the complainant 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.

- 3.37 There may be some information that a complainant 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 complainant that we need to share the information and who with.

4. Implementation

Performance monitoring

- 4.1 We will closely monitor the quality of the service that we provide in relation to Anti-Social Behaviour. We will do this by:
- Ensuring service standards are being met
 - Completing customer satisfaction surveys (where possible)
 - Ensuring vulnerability matrixes are completed and all actions are accurately recorded
 - Conducting regular reviews of ongoing cases, to assess progress and identify any barriers
- 4.2 We will regularly, as required, collate and report statistical information about the management of Anti-Social Behaviour Cases including HouseMark. The responsible officer will ensure that all such statistical information is supplied to HouseMark in accordance with their requests.

Staff Training

- 4.3 emh are committed to providing staff with the necessary training required to be able to effectively deal with Anti-Social Behaviour and related issues. This training will be regularly refreshed and updated to ensure officers are kept abreast of changes to legislation or policy.
- 4.4 Training needs are regularly explored with officers during one-to-one meetings, appraisals and team meetings.

Compliments, Suggestions and Complaints

- 4.5 emh homes will welcome any feedback from our customers and partners; we use to improve our service. This can be sent directly to emh homes by:



- ▶ By email to complaints@emh.co.uk
- ▶ By telephone to 0300 123 6000
- ▶ In writing: emh homes, Memorial House, Stenson Road, Coalville, LE67 4JP

4.6 Any feedback which is considered to be a complaint will be dealt with in accordance with our Complaints Policy.

Review

4.8 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.

Responsibilities

4.9 The Regional Head of Communities is responsible for monitoring the effectiveness of the policy

4.10 The Regional Head of Communities is responsible for oversight and governance of the policy including reviewing this document.

5. Associated Documents

- ▶ Domestic Abuse Policy
- ▶ Hate Crime Policy
- ▶ Neighbourhoods and Estates Management Policy
- ▶ Acceptable Behaviour Procedure
- ▶ Vulnerable Residents Policy
- ▶ Tenancy agreement