



Title: **Antisocial Behaviour and Harassment -
Scotland Procedure**

Business Functions: **Housing Functions across Sanctuary Scotland**

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Authorised by: **Sanctuary Scotland Management Committee**

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General Information

1. Objective of this procedure

- 1.1 This procedure sets out Sanctuary Scotland's approach to responding to antisocial behaviour (ASB) and harassment, and is related to the [Antisocial Behaviour and Harassment - Scotland Policy](#).

2. Legislative/Regulatory context

- The [Antisocial Behaviour \(Scotland\) Act 2004](#) sets out a range of relevant legislation including a legal definition of ASB, arrangements for information sharing, and tools available to local authorities to tackle ASB
- [Data Protection Act 2018](#)
- [General Data Protection Regulation](#)
- [Data Protection - Group Procedure](#)
- [Equality Act 2010](#)
- The [Housing \(Scotland\) Act 2001](#) incorporates and adds to the [Housing \(Scotland\) Act 1987](#) in giving ASB as a ground for eviction.
- The [Housing \(Scotland\) Act 2014](#) introduces new powers including streamlined eviction for ASB and increased powers to use Short Scottish Secure Tenancies (SSSTs) where the prospective tenant has a history of ASB.
- The [Protection from Harassment Act 1997](#) sets a criminal definition of harassment.
- [Personal Safety - Group Procedure](#)
- [Antisocial Behaviour and Harassment - Scotland Policy](#)
- [Safeguarding Vulnerable Adults - Scotland Policy and Procedure](#)
- [Safeguarding Children and Young People - Scotland Policy and Procedure](#)
- In implementing this policy Sanctuary complies with [The Scottish Social Housing Charter](#) outcome 6; 'tenants and other customers live in well-maintained neighbourhoods where they feel safe'.
- [The Short Scottish Secure Tenancies \(Notice\) Regulations 2018](#)
- [The Short Scottish Secure Tenancies \(Proceedings for Possession\) Regulations 2018 Guidance](#)
- [Short Scottish Secure Tenancies for Antisocial Behaviour and Other Miscellaneous Changes to Short Scottish Secure Tenancies - Statutory Guidance for Social Landlords](#)
- [Streamlined Eviction Process - Criminal or Antisocial Behaviour - Statutory Guidance for Social Landlords](#)

3. Responsibilities for implementation

- 3.1 The Group Director - Housing is responsible for ensuring adoption of, and adherence to, this policy and its associated procedures relevant to their operation.
- 3.2 The Director - Sanctuary Scotland has responsibility for ensuring that Sanctuary Housing and Sanctuary Supported Living respectively, are compliant with Legislative/Regulatory requirements and good practice.

3.3 Housing Managers have day-to-day responsibility for the implementation of this policy in practice. They are responsible for ensuring:

- this procedure and associated policy is communicated with all staff;
- suitable and sufficient training and instruction is provided;
- this procedure and associated policy is followed by all staff; and
- the necessary equipment and resources are available to make sure compliance can be achieved.

3.4 To assist Sanctuary in carrying out its obligations, employees must:

- be aware of, understand and comply with this procedure, the associated policy, and any related operational guidance;
- participate in any training which Sanctuary makes available; and
- communicate any issues with implementing this procedure and associated policy to their line manager and identify opportunities for continuous improvement.

4. What's new - What's different?

4.1 April 2019 - Formal review. This procedure has been amended as a result of changes to legislation implemented with the [Housing \(Scotland\) Act 2014](#) and changes have been made as a result of quality assurance exercises:

- The [Housing \(Scotland\) Act 2014](#) introduced some changes in legislation which relate to ASB which include a streamlined eviction process, and increased options for using a SSST as a probationary tenancy when tenants are first signed up.
- There remains a zero tolerance approach to hate crimes, racial harassment and supply of drugs, but text has been amended to state that before taking legal action a consideration is given to whether the action will be reasonable and proportionate.
- The criteria for keeping cases open has been amended. The following clause has been removed: The Housing Officer wishes to wait a reasonable period of time to see if there is any recurrence
- 'Closing the case' section has been amended to clarify that a letter does not need to be sent in all instances as long as contact with those involved in the case is made in some format to ensure that all parties are kept informed of the outcome.
- References to legacy systems and processes have been updated.
- The legal framework on conversions to SSSTs has been added in Sections 1 and 12.
- Details of out of hours arrangements have been removed as this information is now available on KnowledgePoint and the relevant link has been referenced.
- Section 3 - guidance on recording a report of ASB and communication related to the case has been amended to clarify that details should be recorded on the reporters' account in OneSanctuary. Information should only be recorded on the perpetrators' account if there is direct interaction or communication with this person.

Detailed Procedures

1. Prevention of antisocial behaviour

1.1 Our approach to allocating properties and our actions at the early stages of a tenancy are important factors in preventing ASB.

1.2 ASB considerations in lettings

1.2.1 Before allocating a property, Sanctuary will carry out checks on prospective tenants and take the following action, if appropriate:

- Consider suspending applicants who have had former cases of ASB identified as serious and tenancy related (see relevant lettings policy).
- Choose to grant a SSST with support if the prospective tenant has been evicted in the preceding three years or where they or other members of their household are the subject of ASB Order (ASBO) granted on or after 30 September 2002 (see Section 11 below). This does however exclude circumstances where a tenant has previously been granted an ASBO, but has still been issued with a Scottish Secure Tenancy (SST) after the incident.
- Refuse any application to exchange where the incoming tenant has a recovery of possession notice for ASB (see relevant mutual exchange policy);
- Depart from the standard selection process to assist in the maintenance or development of balanced communities (see relevant lettings policy).

1.2.2 Formation of a SSST

- Before the creation of a SSST, a statutory notice must be served on the prospective tenant to state that they will be offered a SSST and this must state which category of SSST it is; (for example due to tenant or member of their household being subject to as ASBO would be on the terms of paragraph 2 of Schedule 6 to the 2001 Act). This must be done before both parties sign the Agreement; either before or during the sign up process. If this is not done, no SSST is created. The tenancy will be an SST.
- Where the statutory notice under section 34(4) of the 2001 Act is served prior to 1 May 2019, the Short Scottish Secure Tenancies (Notices) Regulations 2002 continue to apply and the terms of that SSST will also be those that were in place at the time the notice was issued, even if the SSST itself is granted on or after 1 May 2019.
- From the 1 May 2019 any notices served to create a SSST during allocations will subsequently be subject to the terms of the Housing (Scotland) Act 2014.

1.3 Home visits

- 1.3.1 Where possible, Housing Officers will carry out a home visit before any allocation is made. During the home visit the Housing Officer should briefly state the responsibilities of the applicant if they become a tenant. The Housing Officer should also briefly discuss action that may be taken against them if it is evident that ASB occurs. If it is found that the applicant has had a history of ASB then Sanctuary may consider actions as set out in paragraph 1.2.1 above.
- 1.3.2 At this stage it is also best practice to make note of tenants who may have additional support needs so that if an allegation is ever raised against them, or if they report an incident of ASB, appropriate communication, intervention and risk assessments can be carried out from the start.
- 1.3.3 If a tenant with mental health issues declares that they have previously been involved in ASB or if a pre-tenancy check identifies any prior involvement in ASB, Sanctuary should consider offering information on support services as a preventative measure or consulting social work services/mental health services for advice on how best to support the tenant in managing this behaviour. Working in partnership with other local stakeholders will also help minimise any risk to themselves or others. This can be done by contacting other local agencies to find out where the individual(s) is known to relevant services. Principally adult social care, learning disabilities, community mental health teams. (Refer to the [Catalogue of Advice Providers](#)).

1.4 Sign up

- 1.4.1 When signing up a new tenant, the relevant officer will go through the relevant sections of the tenancy agreement with the tenant. This includes explaining the definition of ASB, highlighting the need to have respect for others, and explaining that they should report any incidence of ASB to the relevant office or agency (See [Catalogue of Advice Providers](#)). New tenants will also be asked to sign a Good Neighbour Declaration which explains Sanctuary's stance on racial harassment and hate crimes and that action will be taken against perpetrators.
- 1.4.2 If the new tenant is signed up to a SSST Agreement, the signing should be completed with extra emphasis placed on the tenant not being involved in ASB for the duration of the SSST, so that they can successfully convert the SSST to a full SST.
- 1.4.3 The applicant will be encouraged to introduce themselves to their neighbours and this will be an opportunity to check up on the cleaning rota (where relevant), bin days, etc. Early contact with neighbours can help reduce any misunderstandings that could lead to neighbour disputes and ASB.
- 1.4.4 To deter and prevent racial harassment and hate crimes, Sanctuary will:
- Ensure all tenants are aware of Sanctuary's zero tolerance to serious criminal offences of racial harassment and hate crimes and of the action Sanctuary are prepared to take against perpetrators.

- Ensure all new residents are made aware of the clause in their conditions of tenancy/occupancy which states that they must not be involved in or allow harassment (racial, sexual, religious or otherwise).

1.5 Tenancy visits

1.5.1 The Housing Officer will carry out a settling in visit within six weeks to ensure the new tenant is coping with their new tenancy and ensure there are no concerns or issues about ASB. Further visits will take place at regular intervals agreed locally and at least every three years.

1.6 Throughout the tenancy

1.6.1 Sanctuary will consider use of the following measures on an ongoing basis:

- Using tenants' newsletters to explain our policy on racial harassment and hate crimes.
- Providing careful publicity of action actually taken against perpetrators: Raising awareness of how Sanctuary deals with ASB may deter it from happening elsewhere. However, any publicity must ensure that the information does not breach data protection policies.
- Working with and providing support to tenant's and resident's associations which encourages them to ensure full involvement from diversity groups and to support any residents experiencing race and/or hate based harassment.
- Using literature such as Factsheets to encourage tenants to take action and some responsibility for resolving their own issues throughout their tenancy.

1.6.2 Out of hours arrangements for reporting ASB will be publicised to tenants so that the reporting of incidents is not deterred by local office opening hours. In turn, incidents can be dealt with in a timely and appropriate manner. Tenants will be encouraged to call the Customer Service Centre on **0300 123 3568** or **0800 916 3538** who will refer the caller to the most appropriate service depending on their location. For more information on these contact details refer to the [KnowledgePoint FAQ and Guidance page, Scotland - ASB section](#).

2. Categorisation of antisocial behaviour

2.1 Response times

2.1.1 Sanctuary defines ASB as either Priority One or Priority Two. For Priority One ASB an investigation will start within one working day. For Priority Two ASB an investigation will start within five working days. These categories are determined by the type of behaviour as follows:

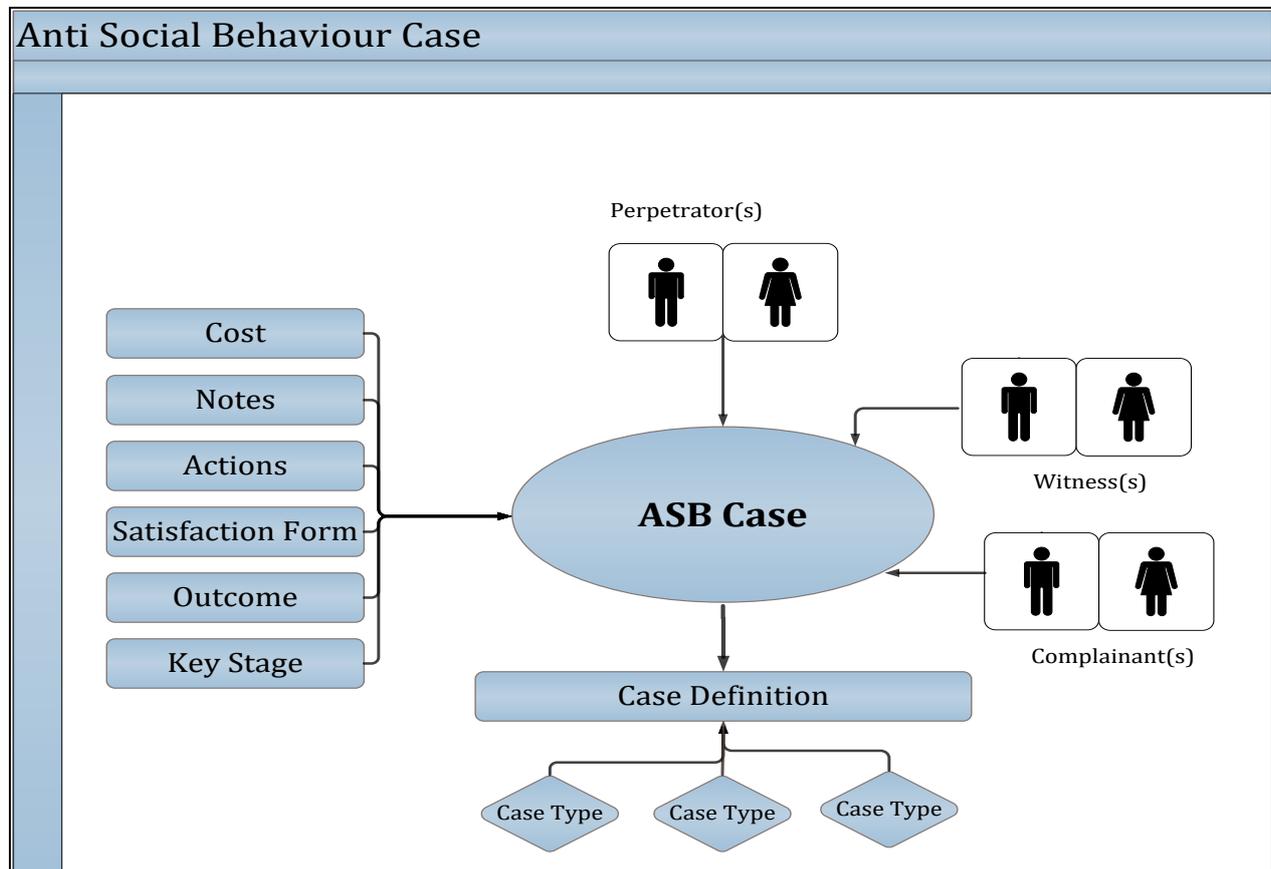
Priority One	Priority Two
Harassment or threats - including racial harassment and hate crimes	Vandalism
Domestic abuse (refer to Domestic Abuse - Scotland Policy and Procedure)	Alcohol related

Priority One	Priority Two
Criminal behaviour	Vehicles
Hate related incidents (hate related harassment, graffiti, violence etc.)	Pet/animals (dog mess, excessive barking, etc.)
Drugs - dealing/supply	Noise
Other violence	Communal areas/loitering
Prostitution	

2.2 Case definitions

2.2.1 Each ASB case logged on the React ASB IT system will have one of the following case definitions:

- **Personal** - designed to identify ASB incidents that the caller, call-handler or anyone else perceives as either deliberately targeted at an individual or group or having an impact on an individual or group rather than the community at large.
- **Nuisance** - those incidents where an act, condition, thing or person causes trouble, annoyance, inconvenience, offence or suffering to the local community in general rather than to individual victims.
- **Environmental** - deals with the interface between people and places. It includes incidents where individuals and groups have an impact on their surroundings including natural, built and social environments. Where a case has more than one case definition or develops more than one as the case progresses then a new case must be set up for each case definition. Please see the diagram below for an explanation of how this works in relation to the system.



3. Initial report

3.1 Responding to the victim

3.1.1 The following actions should normally be taken when the initial report is received:

- Check if the victim has any additional support needs which must be taken into consideration when attempting to communicate such as translation services or interpreters. Seek specialist services where appropriate (See Sanctuary's Inclusive Communication Guidance).
- Confirm the identity by asking the person security questions (if our tenant), such as confirming their date of birth and full name and address;
- Decide on the ASB Priority and arrange an interview within the appropriate timescale (1 or 5 working days see section 2.1); Let the victim know who will handle the case, where this is known;
- The Case Officer will record an initial report of the incident on React if speaking with the victim over the telephone, or use they can use the Initial Incident Report Form (**Appendix 2**) to take notes if meeting with the victim in person. The initial report will include the following information:
 - brief details of the incident including date, time and place;
 - whether the perpetrator is known;
 - details of any witness;
 - whether there have been previous incidents; and
 - whether the police or other agencies have been informed.
- Send out Diary Sheets if appropriate and explain the process for using these. Ensure these are in the most appropriate format and language.
- Consider whether, based on the information provided, there is a need to flag the incident as potentially racially motivated on React and notify relevant third party agencies
- If it is believed that the incident involves racial harassment or hate crime, use the checklist of issues to discuss with the victim at this stage and complete an Action Plan (see **Appendix 3**).
- Give the victim a list of relevant emergency phone numbers if appropriate, and outline how and when the complaint will be investigated (See [Catalogue of Advice Providers](#)).
- It is important to provide holistic assistance by working with multiple agencies and refrain from any actions that might cause upset where the perpetrator has a sensory impairment, disability or mental health issue. For example, take time to explain the importance of involving other agencies in the investigation or taking formal action should they have concerns about this, and seek agreement to proceed at each stage. Involve specialist organisations where the victim may need support with communication, or coming to terms with the incident.

3.2 Assessing risk

- 3.2.1 When the initial report of ASB is received it is important to find out if there is any immediate danger to the victim, and if so contact the police by dialling 999. In some instances, the victim may not want police involvement. Even when this is the case Sanctuary may have an obligation to contact the police if the issue is a serious criminal one (for example an assault case, serious substance misuse, or drug dealing), and/or there is believed to be a threat to the victim's safety. Sanctuary may also have obligations to disclose information under our Safeguarding policies and procedures. If Sanctuary contacts the police against a victim's wishes, then the victim should be informed prior to doing so. Housing Officers should always refer to the Housing Manager before taking this course of action.
- 3.2.2 In serious cases of ASB, harassment and hate incidents (where there is no immediate danger), advise the victim to contact their local police immediately by dialling 101, or alternatively report the incident anonymously to Crimestoppers on 0800 555111.
- 3.2.3 If the victim states that he/she must flee the property, advice must be given on emergency accommodation (See [Catalogue of Advice Providers](#)). Even where the victim does not suggest this, it is good practice for us to discuss this option with the victim if it is felt that there is a continued threat to the safety of the victim. If the victim has left or intends to flee the property, employees must remind the victim of the importance of keeping us informed of their whereabouts i.e. contact numbers etc. Where relevant, advice must be given on the implications on housing benefit and the victim referred for advice on claiming benefit on two homes.
- 3.2.4 When taking an initial report if it is believed that the situation could be putting a vulnerable adult or a child at risk then Sanctuary has a duty to report this to the local authority social work team. Please see the safeguarding policies and procedures for further detail on this.
- 3.2.5 After the initial report, the Case Officer should:
- check the tenancy status and history of the victim;
 - check whether there are any vulnerabilities and/or communication barriers, health and safety issues;
 - consider whether security measures/emergency repairs are necessary; and
 - consider whether emergency legal action is required/being sought and if legal advice from the solicitor is needed.

3.3 Immediate action

3.3.1 In serious cases of ASB, and always in relation to domestic abuse and harassment, there are certain activities that may need to be undertaken by employees urgently:

- All repairs to 'make safe' properties resulting from harassment or domestic abuse must be treated as emergencies. For legal reasons repairs can be completed but not lock changes (unless the lock is beyond repair) where there is a joint tenancy, or the tenancy is in the sole name of the perpetrator (unless there is an exclusion order).
- Sexist, racist, homophobic and obscene graffiti must be removed within 24 hours of it being brought to an employees' attention (photographs must be taken for future legal action).
- Appropriate security measures put in place in the victim's home (e.g. alarms) if there is a continued threat against the victim. These must be undertaken in the shortest possible time. Liaise with the police and or relevant local authority services where relevant.
- Employees must record a detailed description in React, and update OneSanctuary.

3.4 Working with third parties/specialist organisations

3.4.1 When the initial report is received, Housing Officers should signpost victims to any specialist organisations that can provide support (See [Catalogue of Advice Providers](#)).

3.4.2 Where victims/witnesses of racial and hate crime do not feel comfortable reporting the matter directly to the Police, Housing Officers should signpost such cases to Third Party Reporting Centres to ensure all victims/witnesses are able to report such incidents. Police Scotland work closely with these Centres, providing training to their staff. The Centres can assist a victim or witness in submitting a report, or making a report on the victim/witnesses' behalf. The Centres will then pass this information on to the police, with the victims/witnesses' permission. For examples of how Third Party Reporting Centres have been used and to access a list of local Centres see the [Catalogue of Advice Providers](#) and search under Scotland Police.

3.4.3 Housing Officers should familiarise themselves with the details of their local Centres and other specialist agencies in their area.

3.4.4 Before sharing any information with a third party or specialist organisation, it is important to refer to any local information sharing protocols in place. Sanctuary may in some circumstances share information without the victim's consent with any organisation known as a 'relevant authority', which includes local authorities, the police and other RSLs (See [ASB and Harassment - Scotland Policy](#) section 8).

- 3.4.5 If the initial report is from a third party or specialist organisation that is not a 'relevant authority' then consent in writing must be sought from the customer to discuss the matter in detail with the third party. Without this consent, reports from a third party should be taken and logged on React but details about our customer must not be disclosed, until consent is received (unless there is an information sharing protocol in place).
- 3.4.6 If the report has been received by a third party, the victim may not wish to discuss the incident via a formal interview at this point. If the victim does not wish to discuss their situation it is acceptable not to have a formal interview, but employees must offer basic advice (i.e. giving out the number for a relevant organisation or advice line) and give the victim the option to discuss further when required and then close the case.
- 3.5 Recording the complaint
- 3.5.1 React must be used to keep full and accurate records of any contact, communication and developments throughout an ASB case. This information is used for performance management purposes, and is especially important for cases that proceed to legal action. It is vital that records are taken while details are fresh in the mind, as these may be relied on if the officer is called as a witness in court.
- 3.5.2 If the case is related to an existing case, then add the pending note to the existing case. If it is a new case, set up the new case on React. Ensure brief details are recorded on the reporters' account in OneSanctuary including the case reference number, on a CIC interaction.
- 3.5.3 If the complaint is anonymous, then record details on OneSanctuary/React, and investigate as far as possible in line with this procedure.
- 3.6 Complaints against owner occupiers or private tenants
- 3.6.1 If a tenant reports ASB by a private tenant or owner occupier, refer to any locally agreed service level agreements in place first.
- 3.6.2 If the issue is lower level ASB, this issue may be raised with the other party in an effort to resolve the matter, for example by contacting the owner / tenant and asking them to be considerate of their neighbours. If the issue is more serious, or there is no immediate resolution, it is normal to refer the case to the local authority or police.
- 3.6.3 When one of our tenants reports ASB by a private tenant or owner occupier, a case should be opened on record details on OneSanctuary/React. Housing Officers should maintain contact with the local authority, and keep the case open until the outcome has been found out and recorded; making sure the victim has been kept informed throughout.

4. Investigation stage

4.1 Procedure overview

4.1.1 The investigation stage is key to the effective management of ASB. Below is an outline of the action to be taken at the investigation stage of an ASB case.

4.2 Complete an interview with the victim

4.2.1 ASB can affect people in different ways. People may show their emotions in different ways, and may not seem as affected by the ASB as they actually are. The relationship between the victim and the perpetrator may influence how the victim is affected by the ASB. Employees must ensure that empathy and honesty is shown to the victim, regardless of the level of ASB reported. Employees must not be judgemental or dismissive in any way and should agree the case management actions based on the victim's needs rather than their own views on what is needed. When ASB is reported, victims need to feel confident and reassured at the first point of contact that:

- they are being taken seriously;
- swift action is being taken to address the behaviour of the perpetrator; and
- sanctuary will do everything in its power to protect them from intimidation at any stage of the ASB case being dealt with.

4.2.2 Guidance on the type of information required from the victim is provided in **Appendix 4**. In addition:

- agree review times including the frequency of further contact with the victim and when they can expect to receive updates on the progress of the investigation;
- discuss expected outcomes;
- consider other organisations to contact, relevant emergency phone numbers and victim support agencies if applicable; and
- discuss legal powers available to landlord.

4.2.3 When a case is not of an apparently serious nature e.g. noise nuisance, the Housing Officer may suggest that the tenant visits the alleged perpetrator of the nuisance to explain the problem and seek a solution. However, Housing Officers must make a judgement call on whether this is a sensible course of action based on the circumstances. The victim may be told that this course of action might help to diffuse the situation. It might be that the alleged perpetrator is not aware they are causing a nuisance. The victim will be advised that in some cases intervention by a Housing Officer might give the impression that the complainant is being heavy handed using an 'official' to 'accuse' the person of unsatisfactory behaviour and this could cause the case to escalate.

4.2.4 Give the victim Diary Sheets if appropriate and explain how to use these and how frequently they need to be returned.

- 4.2.5 Contact the victim to outline what has been agreed and what will happen next (within three days of interview)
- 4.2.6 Employees must maintain contact with the victim as the case progresses. In addition, employees must:
- work towards case resolution;
 - consider what early intervention action can be put in place;
 - offer ongoing support to victim (including reassessing the vulnerability risk assessment matrix);
 - liaise with other organisations, etc.; and
 - regularly review the agreed actions (and their impact) with the victim.
- 4.2.7 If an employee speaks to any resident, complainant, victim or any person who is **threatening suicide**, the employee must remain calm. They must advise the person to call the Samaritans on 08457 90 90 90. Samaritans provide confidential, non-judgmental emotional support, 24 hours a day for people who are experiencing feelings of distress or despair, including those which could lead to suicide. If a threat of suicide has been made or the employee believes that the person is at high risk, they should speak to a manager and call the Police on 999, requesting they check on the person at risk as soon as possible.
- 4.3 Complete an interview with any witnesses
- 4.3.1 Arrange and undertake interviews with any witnesses (as soon as possible and within a maximum of 10 working days).
- 4.3.2 Victims and witnesses must be advised as soon as is practicably possible, who to contact throughout the ASB case. Employees are responsible for ensuring that victims and witnesses are offered support at the first point of contact, throughout the case handling, and also after the ASB case has been closed.
- 4.3.3 Sometimes people are not prepared to act as witnesses to ASB because they are concerned about possible reprisals. On some occasions therefore, the services of professional third party witnesses may be engaged.
- 5. Guidance on interviewing the victim and witnesses**
- 5.1 Guidance on the information required from interviews is provided in **Appendix 4**.
- 5.2 Consider your own health and safety needs before undertaking home visits (see the [Personal Safety - Group Procedure](#)).
- 5.3 Where appropriate the victim/witness must be interviewed in their preferred manner, for example in their own home, over the telephone or in an office. The victim may wish to have a friend or family member present. Any additional needs (e.g. in relation to disability or communication) must be taken into account and support offered/arranged prior to the interview.

- 5.4 In some cases of ASB or harassment it may be the victim's wishes to have a specific gender or ethnicity of the employee dealing with the incident. This would only be in those instances where it is appropriate to interview victims and witnesses without impeding any external investigations.
- 5.5 Where appropriate, Sanctuary should do everything in its power to ensure such requests can be met. This includes involving other experts or services where appropriate and being clear with the victim of the options, especially if this means that their needs cannot be met within the desired timescale.
- 5.6 The objective of the interview is to attempt to establish the facts and agree a plan for resolution of the issues highlighted. Summarising regularly helps maintain a focus of the questions, and allows the employees to confirm that they have understood the victim correctly. In cases of harassment or serious ASB victims must be referred to specialist counselling and support services such as victim support groups, harassment support groups and domestic abuse support groups where appropriate.
- 5.7 During an interview, employees must approach the victim/witness in a sensitive manner, as the situation may be upsetting and difficult for them. Employees must:
- remain objective and neutral and record evidence in support of the allegations;
 - be honest and realistic as to the extent of the action(s) that can be taken, the timescales involved and what is expected of the victim;
 - explain that the information may be disclosed to the person(s) complained about, but that Sanctuary will not disclose the identity of the victim unless permission has been granted;
 - explain that as it may be obvious who has reported the incident, the victim must be made aware of the potential consequences of this and asked for their continued agreement for us to interview the alleged perpetrator;
 - inform the victim if another organisation needs to be involved;
 - must request from the victim any other supporting evidence such as letters from the victim's GP, if there has been physical injury; and
 - if appropriate, advise the victim on services that can offer independent support or advice.
- 5.8 During an interview, whilst it is expected that the officer should probe to get all the information they need to properly assess the situation, no attempts must be made to undermine the victim's confidence by challenging the validity of their statement or by under-estimating the effect the ASB has on the victim.
- 5.9 At the interview employees should, where appropriate, consider discussing the possibility of mediation. Mediation is often most effective where relationships have broken down between neighbours and especially when started early in a complaint of ASB. Please see **Appendix 5** for further guidance on mediation.

6. Interviewing the alleged perpetrator

6.1 Organising the interview

6.1.1 Arrange and undertake interview with the alleged perpetrator if appropriate (as soon as possible and within a maximum of 10 working days). Where the perpetrator of racial harassment or hate crime is a Sanctuary tenant, the interview should take place within 48 hours of the full interview with the victim. When the interview is not completed within this timescale (e.g. as a result of a direct police request) a record should be kept on React on the reasons for the delay and this should be reviewed every 48 hours. Alleged perpetrators will be given the opportunity to have someone of their choosing present to act as a witness, act on their behalf or provide support.

6.1.2 The purpose of the interview is to inform the alleged perpetrator of the allegation that has been made against them, to draw to their attention the conditions of their tenancy agreement and the potential consequences of their actions, and reinforce our proactive stance on tackling nuisance. The aim is to establish the facts of the case and find a resolution to the problem. The interview must be presented as a positive opportunity for the alleged perpetrator to offer their perspective on the allegations and if appropriate for them to suggest ways in which to resolve the situation. The primary objective is to prevent further incidents arising.

6.1.3 In some cases, it may be necessary for employees to visit perpetrators in pairs if there are any potential safety issues. Where serious concerns exist, interviews with perpetrators should be held at an office (see the [Personal Safety - Group Procedure](#)).

6.2 Identifying responsibility for taking action

6.2.1 If the incident is being investigated by another organisation such as the police, it would not be appropriate to interview the perpetrator without the express consent of the organisation undertaking the investigation. In these cases, employees must take their lead from the investigating organisation and undertake any tasks as directed.

6.2.2 Where the alleged perpetrator is a tenant of another landlord then employees are expected to work in partnership with the landlord in question and for that landlord to undertake the interview with the alleged perpetrator under their policies and procedures.

6.3 Victim/perpetrator confidentiality

6.3.1 The perpetrator will normally only be contacted if the victim gives their consent to do so. If the issue is a serious criminal one (for example a significant assault case, or drug dealing) and the Housing Officer believes there is a duty to inform the police, then guidance should be sought from the Housing Manager. If the police are contacted against a victim's wishes, then the victim should be informed prior to doing so.

- 6.3.2 If the incident is specific to the victim i.e. they have allegedly suffered by a direct act by the perpetrator, then it may not be possible to talk in general terms. The victim must be made aware beforehand that to pursue the incident against the perpetrator, specific reference needs to be made to the victim as it would then be obvious who has reported the incident. The victim needs to be made aware of the potential consequences of this, and be in agreement for us to interview the alleged perpetrator and proceed to investigate the case.
- 6.3.3 As noted above, the victim must be kept informed of the outcome of the interview with the perpetrator. However, Sanctuary must not disclose any of the perpetrator's personal details as this would breach confidentiality.
- 6.3.4 Any customer, including perpetrators/victims of an ASB case, has a right to a Data Subject Access Request (DSAR). If any individual makes a DSAR, Sanctuary must provide them with details of all personal information that it holds about them, but without breaching the confidentiality of any other individual. When recording case information, always be aware that the information is potentially subject to DSAR. For further information refer to the [Data Protection - Group Policy and Procedure](#).
- 6.4 How to carry out the interview
- 6.4.1 Where this interview takes place over the telephone employees must ensure that they are speaking to the correct person by asking the person security questions (if our tenant), such as confirming their date of birth and full name and address.
- 6.4.2 When interviewing the alleged perpetrator employees must:
- outline Sanctuary's ASB policy and what is expected of the alleged perpetrator;
 - ensure that their approach to the alleged perpetrator is objective;
 - ensure an ASB notepad entry is created which gives the reference number for the ASB complaint. All further contact with the alleged perpetrator is logged on React;
 - explain the details of the complaint (outlining times and dates as appropriate) to the alleged perpetrator and let them respond.
 - take detailed notes of the response, avoid generalities and accurately record all the relevant facts, such as what was seen and heard, when and where. Question thoroughly any discrepancies or counter allegations. If relevant, care must be taken at all times not to reveal the identity of the victim;
 - try to establish whether there is an underlying reason for the allegations;
 - inform the alleged perpetrator if other organisations have or are likely to be contacted;
 - on the basis of the evidence advise the alleged perpetrator of the next course of action;
 - reinforce the conditions of the tenancy (if appropriate); and
 - seek any witnesses' details that could support the alleged perpetrators version of events.

6.4.3 If the matter is sufficiently serious the alleged perpetrator should be told prior to the interview starting that:

- the allegations are about a breach of tenancy agreement; and
- notes will be taken which may be used in evidence if a decision is made to proceed with legal action, now or in the future.

6.4.4 Once the incident has been put to the alleged perpetrator, let them respond. Detailed notes of the interview must be made. It may be appropriate to give further details of the incident at this stage to clarify a particular point, but care must be taken not to breach any confidentiality or to stray into subjective views or hearsay.

6.4.5 Where possible employees should offer advice on organisations that can offer independent legal advice or support to assist the alleged perpetrator. In supported housing services the resident would also receive support from employees throughout the process.

7. Result of the investigation

7.1 Best Practice notes

7.1.1 Early intervention can often resolve low level ASB and prevent ASB from escalating to a more serious level. Early intervention can involve one to one visits by employees, warning letters, mediation and restorative justice. Effective work by employees and other agencies at an early stage often has the best results for the victim, perpetrator and the organisation.

7.1.2 Employees must communicate the progress of the case with perpetrators throughout the investigation as a preventative measure. There must be a prevention and early intervention stance towards perpetrators. Enforcement action must only be taken when it is necessary and reasonable to do so.

7.2 Evidence requirements

7.2.1 Employees must note that not all cases will require corroboration, and it is not a pre-requisite to pursuing legal action, but you do need to ensure that you have a strong case to increase the chances of success. It is therefore important to always manage the victims' expectations. Remember that sufficient evidence can be sought and provided from other means, such as professional witnesses, like the police, conflict resolution teams (Local Authority) and other council services.

7.3 Perpetrator denies ASB and/or no evidence of ASB

7.3.1 If the interview with the alleged perpetrator results in them denying the allegation, and there is no evidence to suggest that the alleged incident took place, employees must advise the alleged perpetrator that whilst no further action will be taken at this time, the situation will be monitored for a set period of time and investigations reopened if further complaints are received. The perpetrator must also be advised to keep diary sheets if they have made a counter allegation.

7.3.2 Housing Officers must emphasise the need to comply with the terms of the tenancy agreement (if the perpetrator is a tenant).

7.4 No contact made with perpetrator

7.4.1 If a perpetrator is not willing to cooperate with this process, and refuses an interview, employees must send a warning letter to the perpetrator, reminding them of the obligations in the tenancy agreement, and outlining that any more reports of ASB against them will result in us considering legal action against them.

7.5 Perpetrator admits ASB and/or evidence in place

7.5.1 If there is evidence of the perpetrator being responsible or they admit the incident reported, the perpetrator must be advised that they have breached the terms of their tenancy (if a tenant). Depending on the severity of the breach, Sanctuary may issue a formal warning, advising the perpetrator to stop any breach and making it clear that legal action will be considered if they do not, and that their tenancy is at risk. This must be confirmed to the perpetrator in writing and recorded on React. It is important that the warning makes clear what action is required by the perpetrator to avoid further action.

7.5.2 If, following the warning, the ASB continues then the escalation options set out in sections 10 and 11 will be considered.

8. Multi agency approach

8.1 It is accepted that a joint approach of enforcement and support ensures that the community is protected, and perpetrators are helped to achieve a sustained change in their behaviour. A multi agency approach is essential if effective action is to be taken. Employees must consider the positive effects that support might have on perpetrators and this is particularly relevant when considering ASB issues that result directly or indirectly from:

- Drug abuse
- Alcohol abuse
- Mental health issues
- Disabilities
- Domestic abuse.

- 8.2 Referral to and liaison can take place with a number of organisations including the following, see [Catalogue of Advice Providers](#) for a more comprehensive list:
- Police
 - Neighbourhood wardens
 - Youth Offending teams
 - Schools
 - Health Services
 - Drug Action teams
 - Social Work Services
 - Probation Services.
- 8.3 Local authority ASB units. It may be possible to prevent legal action being undertaken through a co-ordinated approach by specialist organisations to provide perpetrators of ASB with the support that they need.
- 8.4 Often perpetrators require assistance in securing additional support services. This help must be provided by employees and it is not enough to leave them to it. This may involve signposting to local counselling or support services. It may also involve referring people to social work or mental health services depending on the circumstances of the case.
- 8.5 Employees are encouraged to keep up to date with on-going progress and initiatives in the rehabilitation of perpetrators that will exist locally.

9. Victims and perpetrators with mental health needs

- 9.1 ASB can affect a person's physical and mental health. Victims of ASB may become ill as a result of their experiences, and it is highly likely to exacerbate an existing mental health condition. There is evidence to suggest that people with mental health conditions and other disabilities are proportionately more likely to be victims of ASB. Some perpetrators may also have health issues that may be a factor in their behaviour which can make any ASB related behaviour more difficult to address.
- 9.2 When dealing with victims, witnesses and perpetrators it is important to ensure any health needs are addressed and taken into account in dealings with them. Employees should take proactive action to signposting sensitively to the appropriate support mechanisms and ensuring that appropriate communication channels are used. If the individual(s) have a preference for communicating in a particular way, this should be noted and adhered to. This will facilitate the removal of any barriers to further reporting/ information-sharing and monitoring. Employees should also consider how victims can be offered different methods of reporting such as helping them to set up a speed dial number as a precaution during sign up.
- 9.3 It is important that when health needs have been identified in victims, witnesses or perpetrators then partnership working needs to commence to ensure that adequate support is provided. At a local level, general practitioners, community psychiatric nurses, social services or community mental health teams, drug and alcohol workers and health visitors all have a role to play.

- 9.4 When collecting evidence from victims or perpetrators, try to adopt a range of methods if conventional means are not effective. Consider working with Community Safety teams, collecting written or pictorial accounts, checking or installing CCTV, identifying a responsible guardian who can make a statement on their behalf.
- 9.5 Employees should not and cannot overlook the impact of mental health conditions on behaviour (of both victims and alleged perpetrators). Failure to effectively acknowledge and deal with any mental health issues will lead to an ineffective investigation and a higher likelihood that the behaviour will continue. If you are unsure, talk to your manager and/or the Safeguarding Vulnerable Adults Champion.
- 9.6 Further information can be found in the [Safeguarding Vulnerable Adults - Scotland Policy and Procedure](#).

10. Victims and perpetrators with disabilities, sensory impairments and other support needs

- 10.1 It is widely recognised that harassment is an everyday reality for many disabled people who often accept it as inevitable and part of life. There is a culture of disbelief around disability-related harassment. Disabled people often do not report harassment and when it is reported, public authorities mostly fail to take action against it.
- 10.2 Employees should be aware of this and must ensure that they take responsibility to recognise and respond properly to such issues. For further information refer to the Sanctuary in Scotland Safeguarding Policies and Procedures.
- 10.3 As is the case when working with victims or perpetrators with mental health issues, it is essential that people with disabilities have their support needs acknowledged when dealing with the case and that they are recognised as being disproportionately affected by ASB. It is therefore important to be as proactive as possible in deterring ASB cases from arising by identifying any support they may require to manage their behaviour at sign up. For victims, early intervention is also encouraged; consider implementing extra safety mechanisms at the start of a tenancy to ensure they are safe in their homes. Examples of this include:
- Plan frequent of home visits to the individual to ensure they are safe.
 - Ensuring the tenant has emergency contact numbers on speed dial.
 - Provide additional information in alternative formats to ensure the tenant fully understands what ASB is, and how they can report it.
- 10.4 If an ASB case does arise, efforts must be made to identify and address the root causes of the case in a sensitive manner. This is to ensure the most appropriate response is applied.

10.5 Adopt a multi-agency approach and consider the different methods outlined in section 9 for communicating with the tenant, always taking into account their preferences. For instance, check if the individual requires, or requests an 'appropriate adult' to be present at any consultation. Employees are also encouraged to seek specialist help and advice at the earliest opportunity, where it is deemed necessary. Organisations include:

- Mencap - support for people with learning difficulties
- Disability Rights Commission
- Capability Scotland
- Royal National Institute of Blind People (RNIB)
- Action on Hearing Loss
- Sense
- Scope.

10.6 Where victims or perpetrators of ASB are known to be involved in substance abuse, employees should recognise their additional support needs and work with them to address these issues. Use the [Catalogue of Advice Providers](#) to signpost tenants to relevant agencies who can offer specialist advice and support.

11. Non legal remedies to address antisocial behaviour

11.1 Overview

11.1.1 There are a range of measures to address ASB which range from the non-legal to the formal. Non-legal measures should always be pursued first with formal legal action a last resort. Non-legal measures include (but are not limited to) the following.

11.2 Mediation

11.2.1 Mediation is a voluntary process where an independent third party helps conflicting parties to work through their differences and disagreements. The aim is for agreement to take place between the two parties on their future behaviour. Employees should use a specialist mediation service, unless in house employees or residents have been trained in mediation. Mediation must be attempted to resolve an ASB case before any legal action is taken if it is appropriate to the circumstances of the case. By getting all interested parties together a solution may be found. Please see **Appendix 5** for further details on mediation.

11.3 Tenancy support

11.3.1 Housing Officers can refer tenants to support services, which may offer assistance in dealing with possible breaches of tenancy.

11.4 Verbal/written warnings

11.4.1 Prior to legal action these can be simply and effectively undertaken, and copies retained on file (see section 7 above).

11.5 Acceptable Behaviour Contracts (ABCs)

11.5.1 An ABC is a voluntary contract offered to perpetrators of ASB, widely used with young people. ABCs are offered as a final opportunity to the perpetrator to amend their behaviour prior to commencing legal action if no improvement is made. The contract usually stipulates that the resident does not carry out certain acts. ABCs must be monitored, and support provided where necessary to ensure the perpetrator avoids 're-offending' and thus complies with the terms of the ABC.

11.5.2 If possible, liaise with social work services to hold a 'case conference' to compliment the implementation of the contracts. This involves speaking to schools, police and any other involved agencies to draw awareness to the situation and giving them an opportunity to increase their involvement in the case to deter it from reaching more serious consequences.

11.5.3 ABCs may be appropriate under the following circumstances:

- The behaviour is not serious enough to warrant an ASBO or possession proceedings.
- There is not enough evidence to pursue a legal remedy.
- The behaviour is caused by a minor.
- There is a need to remedy the behaviour quickly.
- There is a need for early warning of consequences, should behaviour continue.
- There is an opportunity for parents or families or support services to intervene.

11.5.4 A breach of an ABC can be used as evidence to support legal enforcement action such as claims for possession.

11.6 Unacceptable behaviour notice (UBN)

11.6.1 Where a young person refuses to sign an ABC, or does not engage with us, Sanctuary may issue them with a UBN. A UBN will normally be served to perpetrators with Community Police Officers in attendance. The aim of a UBN is to make the offender aware of their actions and the consequences of continuing ASB. A UBN does not have any legal standing, although it can be used as evidence to help support legal remedies such as an ASBO.

11.7 Local authority action against noise nuisance

11.7.1 Local authorities have powers to investigate complaints about noise. They can serve warning notices, serve a Fixed Penalty Notice or obtain a warrant to seize and remove any equipment used in the emission of noise. The evidence a local authority may use to take action includes diary sheets and evidence from recording equipment.

11.7.2 Where ASB is noise-related and where perpetrators have hearing impairments, encourage low-cost solutions like purchasing long-cable earphones.

11.8 Right to Buy refusal

11.8.1 An application for Right to Buy may be refused if a Notice of Proceedings (NOP) has been served under grounds 1-7 of the Housing (Scotland) Act 2001 i.e. conduct grounds. Ground 7 is ASB by tenant, other occupier or visitor and it is not reasonable to make other accommodation available to the tenant.

11.8.2 Where the application is refused, the tenant will be able to re-apply once the notice ceases to have effect (unless another notice on conduct grounds has been served) or if any recovery of possession proceedings is subsequently abandoned or rejected by the court.

11.9 Management transfers

11.9.1 Transferring a victim to resolve a case of harassment will be considered with caution because if it is not done in a sustainable way it will not tackle the root cause(s) of the problem. However, in certain circumstances it will be considered as a viable option. In all circumstances the case will be assessed to see whether it can be awarded an urgent priority in accordance with the appropriate lettings policy and procedure.

11.9.2 Sanctuary provides for high priority to be granted to tenants subjected to racial harassment and hate crimes or requiring protection as a witness in exceptional circumstances. This can only be done after the preparation of a report by the Case officer, detailing the reasons supporting a recommendation to award a management transfer.

11.9.3 If a management transfer is approved the tenant would receive one offer only of alternative accommodation on a 'like for like' basis. See Sanctuary's separate procedure for Management Transfers. However, in these circumstances Sanctuary will still seek to take action against the perpetrator of the hate crime. Perpetrators should be made responsible for their actions and should not be allowed to feel empowered at the victims' expense.

11.9.4 If the victim fears for their safety if they stay in their home, Housing Officers should speak to the police and seek their assistance. It is best practice to liaise with the police and ensure that there is sufficient evidence before approving a management transfer. If approved, the officer must help the complainant by seeking temporary accommodation either within Sanctuary's own stock or through the local authority or another registered social landlord. If the victim wants to move permanently, Sanctuary should provide them a transfer application form. The Case officer must treat the application as high priority in accordance with the Lettings Policy and work with other housing providers if Sanctuary cannot provide a suitable transfer offer from its stock within a reasonable time.

11.9.5 The Housing Managers also have discretion to grant high priority for a transfer application to overcome a situation that is undermining the effective management of the accommodation or estate. This might include in some situations where it is desirable to move the alleged perpetrator to other accommodation.

11.10 Other action against the perpetrator

11.10.1 Where the perpetrator of racial harassment or hate crime is the tenant of another Housing Association or local authority, their Director or equivalent should, where the facts warrant it, be notified by telephone and in writing of the outcome and requested to take prompt action. Where Sanctuary is not satisfied with the action of the landlord against the perpetrator, taking independent legal action will be considered. Where damage is caused to a Sanctuary property, the cost of the works should be charged to the perpetrator(s) where their culpability can be proven.

11.10.2 Non-legal interventions also include referrals to third party organisations other than the police (see [Catalogue of Advice Providers](#)) who can supply a range of services:

- Mentoring
- Family Intervention Projects
- Victim support
- Witness Support
- Floating Support
- Housing Review Panel.

12. Legal remedies to address antisocial behaviour

12.1 Legal remedies can be used alongside other strategies. Only when preventative and management approaches have failed to resolve the problem will the use of legal remedies be considered. This is not only because of the seriousness of taking away someone's home but also because eviction may not in itself resolve the problem; it may simply move it elsewhere.

12.2 The following legal remedies will be considered, with more detailed information provided in **Appendix 6**.

- Interdicts/Specific Implement
- ASBOs
- Conversion from SST to SSST
- Interim ASB orders
- Use of SSST
- Possession proceedings.

12.3 The Housing Manager can decide whether to pursue legal action. Where court action is instigated, the case will be reported to the appropriate governing body committee by the Housing Manager. Any court action must be presented to and approved by the appropriate governing body, using the Antisocial Legal Action Report form. Updates on any cases referred for court are provided by the housing managers in their reports to Operations / Service Delivery Committees.

- 12.4 If a tenant, household member or visitor of the property, is convicted of using the house or allowing it to be used for immoral or illegal purposes, or of an offence punishable by imprisonment committed in or in the locality of the property, Sanctuary are entitled to seek a court order for eviction. If Sanctuary chooses to do this, a Notice of Proceedings must be served first. This notice must be served within twelve months of the date of the conviction (or within twelve months of the conclusion of an unsuccessful appeal against the conviction). Tenants will have a right to challenge the decision.
- 12.4.1 Sanctuary may choose not to take such action against someone who is taking illegal drugs in the home for personal use only, which does not cause disruption or nuisance to neighbours, even if there has been a conviction for possession. Action will however be taken for the supply of drugs within a Sanctuary property.
- 12.5 If the case is referred to court, the tenant will be advised by letter and informed that they may be liable for any legal fees incurred. The letter will also signpost the tenants to appropriate advice and support.
- 12.6 If proceedings for possession are raised, in order to comply with Section 11 of the Homelessness etc. (Scotland) Act 2003, Sanctuary must ensure that the local authority have been sent a Section 11 notice, no later than **four weeks** before the eviction date is set.
- 12.7 Where Decree for Eviction is granted, an Eviction Report must be presented to the appropriate governing body committee for approval before the Decree can be implemented.
- 12.8 If racial harassment or hate based harassment is proved, Sanctuary must take robust legal action against the perpetrator where the consent of the victim is given. Legal advice should be obtained, and a record kept on database of the advice received, decisions on further action with reasons.
- 12.9 Conversions to Short Scottish Secure Tenancies
- 12.9.1 A notice can be served on an existing tenant to end an SST and demote it to a SSST if they have been subject to an ASBO in their existing tenancy or where a tenant or someone living with the tenant has acted in an antisocial manner, or pursued a course of conduct amounting to harassment of another person. This conduct must have been in or around the house occupied by the tenant and it must also have happened in the 3 years before the notice is served. The notice must specify the tenant and/or member of the tenant's household who is subject to the ASBO or, where no ASBO has been granted by the court, the notice must include the actions of the person who has behaved in an antisocial manner, our reasons for converting the tenancy and details of the tenant's right of appeal to the court. Sanctuary can also convert a SST to a short SST where the ASBO was given at a previous address by a different landlord, provided the tenancy at the previous address had been a SST.

13. Case reviews

13.1 All racial harassment and hate crimes cases should be reviewed with the line managers at the following stages:

- Immediately after the initial report is received by the Case Officer.
- Within three working days and 24 hours in cases involving violence, the Case Officer will meet with their Manager to review the initial actions that have been taken and ensure that an action plan has been produced.
- Within nine working days of the initial report, review progress of the investigation, then every two weeks thereafter until the case is closed.

14. Closing the case

14.1 Where possible employees must close the case with the consent of the victim after discussing the matter. Where no further incidents are reported for a reasonable period, normally between three and six weeks, the case is closed, and a letter may be issued to the resident explaining the reason why. It must be made clear to the victim that they can come back to us should any further incidents happen, and the case will be looked at again. A case will normally be closed when:

- it has been successfully resolved without using legal action;
- it has been successfully resolved because of threatened legal action;
- it has been successfully resolved because of legal action;
- the perpetrator is no longer in the property and moved out of the area; or
- there is no further action that Sanctuary can take (closed unresolved).

14.2 Cases should therefore be kept open when there is further action to be carried out by Sanctuary or another agency.

14.3 When closing the case in React, it is very important that the 'Date Completed' field should be recorded as the date of when the last action was taken to resolve the case. This is particularly important in instances where a case has been left open for a short time period to ensure there is no recurrence. For example: A party is held on 1st December, and the perpetrator is warned on 3rd December. After waiting until the party season concludes, the case is closed, and a satisfaction survey is sent to the complainant on 6th January. Here, the 'Date Completed' should be recorded as 3rd December, which is the date of the last action taken to resolve the case. The 'Final Letter Sent' date will be 6th January.

14.4 If the victim is not satisfied with the way Sanctuary has handled their ASB concerns, then the option for this to be addressed through the complaints handling procedure should be explained.

14.5 After the ASB case is resolved and the case has been closed, we will agree an approach with the Business Information team for capturing satisfaction.

14.6 All personal alerts or bulletins on OneSanctuary relating to the case should be amended or removed as appropriate. It is also vitally important that any organisations that were involved in the case are notified that the case has been closed.

15. Reopening closed cases

15.1 Cases should not be closed until Sanctuary has completed all the actions and is confident that the matters are resolved. If this has been done, then the case should be closed and should not be re-opened.

15.2 If further incidents occur after a case has been closed, then a new case should be opened and linked via React to the original case.

16. Monitoring the cost of antisocial behaviour

16.1 The cost to the housing sector of dealing with ASB is huge. For this reason, it is essential that the cost to the organisation of our ASB responsive work is actively monitored, to better understand where changes can be made, and activity put in place to help reduce the cost.

16.2 When monitoring the cost of ASB the housing management costs include employee time, overheads and direct costs (for example court fees), but not consequential costs such as graffiti removal, repairing vandalism and void rent loss. Due to this, the actual cost may well be much higher than calculated.

16.3 React has a sophisticated cost analysis tool and all employees using the system must ensure that:

- All work undertaken in relation to ASB cases is logged on the system to enable accurate costing to be produced;
- All costing information entered on the system is as accurate as possible;
- When cases have been closed people update any costing information that comes in via invoices after this date.

16.4 We will regularly analyse the cost of our ASB work and report this via our normal ASB reporting and monitoring activity.