

# Anti-Social Behaviour Policy

# Contents

<b>1</b>	<b>Aims</b>	<b>1</b>
<b>2</b>	<b>Scope</b>	<b>1</b>
<b>3</b>	<b>Policy Statement</b>	<b>2</b>
3.1	Definition of Anti-Social Behaviour (ASB) . . . . .	2
3.2	Hate Incidents and Hate Crime . . . . .	4
3.3	Domestic Abuse . . . . .	4
3.4	Data Protection and Confidentiality . . . . .	6
3.5	Our Approach . . . . .	7
<b>4</b>	<b>Procedure Statement</b>	<b>12</b>
4.1	Community Trigger . . . . .	13
<b>5</b>	<b>Monitoring and Delivery</b>	<b>14</b>
<b>6</b>	<b>Legislation and Regulation</b>	<b>14</b>
<b>7</b>	<b>Related Policies and Procedures</b>	<b>14</b>
<b>8</b>	<b>Glossary</b>	<b>15</b>
<b>9</b>	<b>Document Control</b>	<b>15</b>

# 1 Aims

1. Jigsaw Homes Group recognises the adverse impact anti-social behaviour can have on its tenants, residents and the wider neighbourhoods in which we operate. All landlords play a key role in preventing and tackling anti-social behaviour in the areas where we own and manage homes, in support of our mission of Creating Homes, Building Lives.
2. The aims of this document are:
  - to ensure we are effective in our approach to prevent and tackle anti-social behaviour
  - to define what we mean by “anti-social behaviour” in terms of community safety and what customers can expect from us
  - to meet our legal requirement of publishing a policy and procedure statement in accordance with Section 218A(3) to (6) of Housing Act 1996
  - to comply with the anti-social behaviour requirements of the Neighbourhood and Community Regulatory Standard

# 2 Scope

3. This policy and procedure applies to all staff that provide a transactional or specialist anti-social behaviour service on behalf of the Group’s landlords which are:
  - Adactus Housing Association
  - Aksa Homes
  - Beech Housing Association
  - Chorley Community Housing
  - Gedling Homes
  - New Charter Homes
  - Threshold (in its capacity as managing agent for stock owned by any subsidiaries of the Group).
4. It has been written as a guide for Jigsaw customers who are affected by anti-social behaviour and wish to report it. Customers are advised that in an emergency situation where there is risk to their safety or the safety of others, they should contact the police in the first instance.
5. For the purpose of this document a Jigsaw customer is a tenant or anybody affected by the actions of one of our tenants, including those working in our neighbourhoods i.e. staff, police, contractors employed by us etc.

6. For those customers who are affected by anti-social behaviour but unable to report it themselves, we will accept an initial report from their personal representatives e.g. a family member, Support Worker etc., however we can only accept such reports if the personal representative has the consent to act on the affected person's behalf,
7. We will also accept complaints where the person reporting it wishes to remain anonymous; however our response may be limited in these circumstances.
8. This policy and procedure statement also relates to those customers who are engaging in anti-social behaviour and want to know how we deal with it.

### **3 Policy Statement**

9. Jigsaw Homes Group recognises the impact that anti-social behaviour has on individuals and community safety. We operate a victim centred approach to dealing with it and offer a wide range of ways that customers can report it.
10. We are signatories to the Chartered Institute of Housing Respect ASB Charter for Housing which contains core commitments for providing a high quality anti-social behaviour service.
11. We clearly communicate to our tenants that anti-social behaviour will not be tolerated. We expect our tenants to act reasonably and be considerate of the different values and lifestyles reflected in our neighbourhoods. Our tenancy, occupancy and licence agreements clearly state what we mean by anti-social behaviour and that tenants are responsible for the behaviour of everyone living with them or visiting them.
12. Where the anti-social behaviour is a criminal offence, we will encourage those affected by it to report the matter to the police.

#### **3.1. Definition of Anti-Social Behaviour (ASB)**

13. The term "anti-social behaviour" is broad in its definition and will mean different things to different people. Jigsaw defines anti-social behaviour in accordance with Part 1 of the Anti-social Behaviour, Crime and Policing Act 2014 as follows:
  - conduct that has caused, or is likely to cause, harassment, alarm or distress to any person
  - conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises
  - conduct capable of causing "housing-related" nuisance or annoyance to any person (housing related meaning directly or indirectly relating to our housing management functions)
14. We provide examples of behaviour that falls within this definition in our various tenancy, occupancy and licence agreements. Below are some examples of the more common types of anti-social behaviour, but this list is not exhaustive

- harassment
- using or threatening to use violence
- bullying or intimidation
- repeated abusive language or behaviour
- actions of hostility or prejudice against anyone because of their actual or perceived identity, whether that be their race, religion, disability, sexual orientation, transgender identity or alternative sub-culture (this is known as a hate incident or hate crime)
- any incident or pattern of incidents of controlling, coercive, threatening behaviour violence or abuse between those who are, or have been, intimate partners or family members regardless of gender (this is known as domestic abuse)
- loud music and/or noise that is capable of causing nuisance or annoyance to a reasonable person.
- dog barking and fouling that is capable of causing nuisance or annoyance
- making false or malicious complaints about someone else's behaviour
- using the property or allowing it to be used for any immoral or illegal purpose
- causing or committing any act of violence or any form of harassment, intimidation or abuse against any member of our staff or anyone authorised to act on our behalf

15. Sometimes customers wish to report behaviour they believe is unacceptable, but the behaviour is not anti-social in accordance with our definition. Jigsaw Homes Group expects customers to be tolerant of other people's lifestyles and will not accept reports of behaviour that most people accept as a reasonable part of everyday life. For example:

- A one-off party
- Children playing outside i.e. playing ball games
- Children arguing or fighting with one another
- Actions that are considered to be normal everyday activities or household noise
- Reports of people staring
- Actions which amount to people being generally unpleasant to one another
- name-calling or disputes via social media such as Facebook, unless it amounts to harassment

16. Staff will exercise their professional judgement when assessing whether or not a report of anti-social behaviour meets our definition or not. Where the behaviour reported is not anti-social, we will provide customers with self-help options where appropriate.

### 3.2. Hate Incidents and Hate Crime

17. Dealing with hate incidents and hate crime is part of our commitment to promote equality and diversity and tackle anti-social behaviour. Hate incidents and hate crime stem from prejudice against others based on views about people's differences. They are, therefore, contrary to our principle of diversity where differences are respected and valued.
18. We include hate incidents and hate crime in our definition of anti-social behaviour on page 3 of this document. Hate incidents only become hate crimes when a criminal offence has been committed.
19. Jigsaw Homes Group will investigate all hate incidents and hate crimes. We take the view that if an incident of anti-social behaviour is perceived by a customer to be motivated by hate then it will be treated as such. The apparent lack of motivation as to the cause of a crime or an incident is not relevant, as it is the perception of the person affected that matters.
20. As part of our multi-agency approach to dealing with anti-social behaviour we will, where appropriate, report hate incidents and hate crime to the police. This could be for recording purposes or action, depending on the customers' wishes.

### 3.3. Domestic Abuse

21. Jigsaw Homes Group believes that no one should have to live in fear of abuse or violence. We understand that it is "domestic" in nature if the perpetrator is a person who is associated with the victim. However, it is not limited to physical violence or confined to instances within the home
22. We include domestic abuse in our definition of anti-social behaviour on page 3 of this document. We have removed the age restriction from our definition because we acknowledge that adolescent to parent violence/abuse can be carried out by family members who are younger than 16.
23. We are signatories to the Chartered Institute of Housing "Making a Stand" Pledge which confirms our commitment to support people who are experiencing domestic abuse.
24. We recognise that domestic abuse can encompass, but is not limited to:
  - **Psychological abuse** which includes intimidation, insults, isolating the person from friends and family, criticising, denying the abuse, treating the person as inferior, threatening to harm children or take them away, forced marriage
  - **Physical abuse** which can include shaking, smacking, punching, kicking, presence of finger or bite marks, bruising, starving, tying up, stabbing, suffocation, throwing things, using objects as weapons, female genital mutilation. Physical effects are often in areas of the body that are covered and hidden (i.e. breasts, legs and stomach)
  - **sexual abuse** which includes rape (including the threat of rape), sexual assault, forced prostitution, ignoring religious prohibitions about sex, refusal to practise safe sex, sexual insults, passing on sexually transmitted diseases, preventing breastfeeding

- **financial abuse** including not letting the person work, undermining efforts to find work or study, refusing to give money, asking for an explanation of how every penny is spent, making the person beg for money, gambling, not paying bills, building up debt in the other person's name
- **emotional abuse** includes swearing, undermining confidence, making racist, sexist or other derogatory remarks, making the person feel unattractive, calling the person stupid or useless, eroding the person's independence, keeping them isolated from family or friends
- **Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour
- **Coercive behaviour** is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim
- **So-called honour-based abuse** is also a form of domestic abuse, explained by the perpetrator of the abuse on the grounds that it was committed as a consequence of the need to protect or defend the honour of the family; it can include all the types of abuse listed above and specific crimes such as forced marriage and female genital mutilation
- **Domestic servitude** involves children, women and men being forced to work in private households as maids, servants, housekeepers, personal carers, nannies, chauffeurs, gardeners and cooks in exploitative conditions. Abuse can take the form of difficult working conditions (no days off, long hours and minimal, if any, salary) and psychological, physical, or sexual abuse.

25. Jigsaw Homes Group has a clear and on-going commitment to the training and development of its employees in safeguarding children and adults in accordance with our Safeguarding policy and procedures. Part of this training commitment includes domestic abuse awareness training,

26. When a disclosure of domestic abuse is made to our staff or we identify possible domestic abuse in our dealings with Jigsaw customers, then we will seek advice from specialist services and share information appropriately in order to support and protect any victim.

27. In addition, if we have safeguarding concerns about a child or adult in the household we will take appropriate action in accordance with our Safeguarding Policy and Procedures Staff who provide our specialist anti-social behaviour service are able to assist victims with:

- referrals to local support agencies using the Safe Lives DASH Risk Identification and Assessment Checklist i.e. Independent Domestic Violence Advisers, Multi Agency Risk Assessment Conferences(MARAC) etc.
- advice regarding their tenancy or occupation

- support to remain in the home including security measures
- advice on housing options

### 3.4. Data Protection and Confidentiality

28. Jigsaw Homes Group collects stores and uses personal data about tenants, residents and partners in its role as landlord and service provider. The Group has in place, and will continue to develop, measures that promote strong privacy and security of personal data in accordance with our Data Protection Policy.
29. In accordance with the General Data Protection Regulations (GDRP) the processing of personal data is lawful if at least one of the following applies:
- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
  - processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
  - it is necessary for compliance with a legal obligation to which the controller is subject;
  - it is necessary to protect the vital interests of the data subject or of another natural person i.e. safeguarding of a child or adult
  - it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
  - it is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child,
30. We realise that customers reporting anti-social behaviour to us may be concerned about personal data relating to their complaint being shared with third parties. Jigsaw Homes Group will only disclose personal data with the customer's consent or where it is lawful to do so.
31. Preventing and tackling anti-social behaviour is one of our legitimate interests and we will share data with other agencies subject to data sharing agreements. The section on partnership working explains what agencies we currently work with.
32. Jigsaw Homes Group will also share data with other appropriate data controllers where an exemption under the Data Protection Act exists. For example if we are requested to share information in connection with the prevention and/or detection of crime or the apprehension or prosecution of offenders.
33. Any information we share with members of Community Safety Partnerships in compliance with our requirements under section 17A of the Crime and Disorder Act 1998 does not involve the sharing of any personal data.



### 3.5. Our Approach

34. Jigsaw Homes Group owns over 33,000 properties across the North West and East Midlands. Some of these properties are dispersed over a wide geographical area and others are located within more traditional housing estates. Our approach is holistic and this can be demonstrated through four key areas of activity:
- Prevention and Early Intervention
  - Support
  - Partnership Working
  - Enforcement
35. Any action we take to deal with anti-social behaviour is carefully considered and proportionate to the effects of the behaviour on individuals, neighbourhoods, our assets and the environment.

#### Prevention and Early Intervention

36. Jigsaw Homes Group uses a wide range of tools to deter customers from engaging in anti-social behaviour and to stop incidents escalating. Below are some of the more common examples used across our neighbourhoods, but this list is not exhaustive
37. **Diversionsary Activities** - We work with residents groups and partner agencies to deliver a range of projects and events that promote community cohesion in our neighbourhoods. We provide diversionsary activities for young people through sport and other initiatives to discourage unacceptable behaviour. We also provide grants for local community projects for a range of neighbourhood initiatives including community safety.
38. **Closed Circuit Television (CCTV)** - Jigsaw Homes Group has cameras located across some of its neighbourhoods and uses CCTV as a visible presence to deter anti-social behaviour and crime. We manage these sites in accordance with our CCTV Policy
39. **Pre Tenancy Information** - Prospective tenants receive information about becoming a tenant during the sign-up interview. This includes specific advice about the community responsibilities of all tenants, those that live with them and those that visit them.
40. **Starter and Introductory Tenancy Schemes** - We operate starter or introductory tenancy schemes, whereby the majority of new tenants are given a probationary tenancy with limited rights. This is usually for a period of 12 months. During this probationary period we monitor the conduct of the tenancy. If a tenant engages in anti-social behaviour during this probation period we will take appropriate action which may result in us ending the tenancy.
41. **Mediation** - Jigsaw Homes Group recognises that neighbour disputes can sometimes escalate due to misinterpretation and lack of communication between neighbours. Where appropriate we will offer those involved in disputes the opportunity to discuss

their issues in a structured way with a trained facilitator. We have our own trained facilitators and also use the services of external providers.

42. **Warnings/Cautions** - We use warnings/cautions to challenge anti-social behaviour and to reinforce the message that it will not be tolerated. They are usually confirmed in writing and describe the type of behaviour, why it is anti-social and the potential consequences if the behaviour does not stop.
43. **Acceptable Behaviour Contracts (ABCs)** - We may use Acceptable Behaviour Contracts to persuade those causing anti-social behaviour to modify their behaviour. The contract records the anti-social behaviour that the person has been involved in, the impact of their behaviour on others, their agreement not to continue with the behaviour in future and any legal action that will be taken if the contract is broken. All parties then sign the contract. If the person is aged between 10 and 17 years old, their parents or guardian will be encouraged to attend any meetings.
44. **Parenting Contracts** - If children are causing anti-social behaviour, it is important that parents or carers are informed at the first opportunity. Some will be unaware of what their child is getting involved in; others may be struggling to manage their child's behaviour. We aim to use parenting contracts to record the steps that parents or carers need to take, to prevent a child from engaging in ASB. Where appropriate they will set out plans designed to support parents or carers in achieving this, for example, by a referral to a suitable parenting programme.

## Support

45. Jigsaw Homes Group recognises the impact anti-social behaviour can have on victims and witnesses. We have appropriate measures in place to identify and respond to risk and the vulnerability of those affected by it.
46. Where appropriate we will use a Risk Assessment Matrix (RAM) to identify the following:
  - the welfare, safety and well-being of the person
  - the impact the behaviour is having on their lives
  - an assessment of any vulnerability and the support in place
  - what's known about those causing the anti-social behaviour
  - the cumulative effect of any repeated incidents
47. The purpose of the risk assessment is to determine the impact of anti-social behaviour on victims and witnesses and to ensure that we provide an appropriate response. We will tailor support accordingly, taking all known circumstances into account. Below are some examples of the types of support, but this list is not exhaustive:
  - directing victims and witnesses to specialist agencies that can assist them (where appropriate we will make referrals on their behalf) i.e. victim support
  - in-house tenancy support, subject to local arrangements

- security measures i.e. CCTV, target hardening of the property
- legal action to protect from serious harm
- temporary or permanent re- housing subject to local arrangements
- ensuring that witnesses attending court are supported
- involving our Community Safety Partners to provide a holistic approach to support i.e. referrals to Anti-Social Behaviour Risk Assessment Committees or other similar groups.

48. As part of our commitment to tackle anti-social behaviour we recognise that those causing it may have underlying problems which contribute to their actions i.e. alcohol misuse, drug misuse, physical health problems, mental health problems etc.
49. Jigsaw Homes Group will support those causing anti-social behaviour to identify and resolve their problems either by signposting them to appropriate agencies or making referrals on their behalf. Subject to local arrangements, we may offer in-house support to those willing to change their behaviour.
50. Where necessary we will couple any support with enforcement action in order to ensure the person engages and stops causing anti-social behaviour. We will take swift action if the person causing the anti-social behaviour is failing to engage with support and/or their behaviour does not improve. Our primary focus will be to ensure the necessary protection is in place for victims and witnesses.
51. In supporting those that are suffering from anti-social behavior or causing it, staff will report any safeguarding concerns they become aware of to the relevant agencies in accordance with Jigsaw Homes Group Safeguarding Children and Adults Policy and Procedures.

### Partnership Working

52. Jigsaw Homes Group work in partnership with a wide range of agencies both strategically and operationally to prevent and tackle anti-social behaviour in our neighbourhoods. We recognise that where those causing anti-social behaviour are known to several agencies, we can tackle the issues more effectively by working in partnership.
53. We will support and contribute to Community Safety Partnerships where crime and anti-social behaviour is having an adverse effect on our neighbourhoods.. There are currently sixteen Community Safety Partnerships operating in the geographical areas where we own properties. As we are not a responsible authority of these partnerships, our influence can sometimes be limited, especially in locations where we have limited numbers of homes.
54. Jigsaw Homes Group will, where appropriate, arrange and/or attend partnership meetings with agencies where a multi-agency approach is beneficial to resolving issues. The majority of agencies we work with are the responsible authorities of Community Safety Partnerships i.e. the police, the local authority, fire and rescue service, probation service and clinical commissioning groups.

55. Where requested to do so, we will attend case intervention meetings that involve our tenants or prospective tenants i.e. the Multi-Agency Public Protection Arrangements Group (MAPPA), Multi Agency Risk Assessment Conferences (MARAC), Anti-Social Behaviour Risk Assessment Conference (ASBRAC) etc.

## Enforcement

56. Jigsaw Homes Group will make use of the full range of non-legal and legal actions available to us. We will take legal action where necessary to protect victims and witnesses and to stop problems escalating.
57. Any legal action we take will be proportionate and supported by sufficient evidence including action taken or being considered by other agencies i.e. the police, the local authority etc. We will have due regard to the Human Rights Act 1998 and Equality Act 2010.
58. Where appropriate, we will also consider and promote the implementation of legal action enforceable by other agencies, for example:
- where the anti-social behaviour is being caused by owner-occupier, other social landlord tenants or private tenants in our neighbourhoods
  - where the anti-social behaviour is a criminal offence
59. The legal powers available to us are:

## Civil Injunction

60. This is a civil power under Part 1 of the Anti-social Behaviour, Crime and Policing Act 2014 for the purpose of stopping or preventing individuals engaging in anti-social behaviour. The court has to be satisfied that on the balance of probabilities an individual has engaged or threatens to engage in conduct capable of causing nuisance and annoyance in order to grant the injunction.
61. It can be issued against an individual who is 10 years of age or over. It is issued by the County Court or High Court for over 18s and the Youth Court for under 18s.
62. The injunction includes relevant prohibitions to get an individual to stop behaving anti-socially. It can also include positive requirements to get an individual to deal with the underlying causes of their behaviour.
63. A court can attach a power of arrest to the injunction where it is satisfied that the individual has engaged or threatened to engage in violence against other persons or where there is significant risk of harm to other persons.
64. If there is evidence that an individual has not complied with the terms of an injunction this is a breach, which is a civil contempt of Court. For over 18s this is punishable by up to 2 years in prison and/or an unlimited fine. For under 18s this is punishable by a supervision or detention order.
65. Jigsaw Homes Group will consider taking possession proceedings against tenants who are committed for breaching an injunction.

## Demoted Tenancies

66. Jigsaw Homes Group can apply to the County Court for a demotion order against a tenant in accordance with the Housing Acts 1985 and 1988 (as amended). In Court we must prove that the tenant, a member of their household or a visitor has behaved antisocially or used the property for illegal purposes. If the Court grants us a demotion order, it ends the tenancy on a specified date. If the tenant remains in occupation, a new demoted tenancy will begin on the same date.
67. Demoted tenants have limited rights while their tenancy remains demoted, which is usually between 12 and 18 months. If anti-social behaviour continues or the tenant breaks other terms of the demoted tenancy, then we can go back to court and request possession of the property.

## Possession Proceedings

68. Jigsaw Homes Group can apply to the County Court to recover the possession of a tenant's home in accordance with the relevant schedules of the Housing Act 1985 (as amended) and the Housing Act 1988 (as amended). There are 2 different types of possession proceedings that can be taken, those that rely on discretionary grounds and those that rely on a mandatory (absolute) ground.
69. Discretionary Grounds - In granting possession the Court must be satisfied that the ground for possession has been established and it is reasonable to make the order. The grounds we can rely on in respect of anti-social behaviour are as follows:
  - Any obligation of the tenancy has been broken
  - The tenant or anyone living in or visiting the property has been:
    - guilty of behaviour causing or likely to cause nuisance or annoyance to anyone living in, visiting or carrying out a lawful activity in the locality and/or
    - guilty of behaviour causing or likely to cause a nuisance or annoyance to the landlord, or a person employed (whether or not by the landlord) in connection with the landlord's housing management functions and/or
  - convicted of using the premises or allowing it to be used for immoral or illegal purposes and/or
  - convicted of an indictable offence committed in the locality
  - The tenant or an adult residing in the dwelling-house has been convicted of an indictable offence which took place during, and at the scene of, a riot in the United Kingdom
  - One partner of a married/civil partnership/cohabiting couple must have left because of violence or threats of violence from the other partner towards her/him, or a member of her/his family living with her/him, and the partner who has left must be unlikely to return. The violence must have been a cause of the partner leaving.

70. Mandatory Ground - We will follow Part 3 of the Pre-Action Protocol for Possession Claims by Social Landlords before issuing any proceedings on mandatory grounds. In granting possession the Court only needs to be satisfied that the ground for possession has been established. Any of the following 5 conditions can apply:

- the tenant, or a person residing in or visiting the dwelling-house, has been convicted of a serious criminal offence, committed in a relevant place or against a relevant person
- that a court has found that the tenant, or a person residing in or visiting the dwelling-house, has breached a provision of an injunction
- the tenant, or a person residing in or visiting the dwelling-house, has been convicted of a breach of a criminal behaviour order
- the dwelling-house is or has been subject to a closure order for a continuous period of more than 48 hours
- the tenant, or a person residing in or visiting the dwelling-house, has been convicted of breaching an abatement notice or court order to abate statutory nuisance due to noise.

## 4 Procedure Statement

71. Jigsaw Homes Group customers can report complaints of anti-social behaviour in a number of ways:

- By telephone during office hours
- By email at anytime
- On line via the customer portals on our website at anytime
- In person at any of our offices during office hours
- By writing to us at our Head Office anytime.

72. In accordance with the Customer Contact Strategy, these options will be subject to change based on how our services are delivered in future and the opportunities provided by new technology. The most up to date contact details are available on our website [www.jigsawhomes.org.uk/contact](http://www.jigsawhomes.org.uk/contact).

73. When customers make contact with Jigsaw Homes Group we will provide the following service standards:

- Telephone Response - 70% of transactional enquiries are currently resolved at first point of contact. Where this is not possible, an Officer from our specialist team will get back to you within two working days
- Website and Email - Customers can expect a response within two working days

- Office Visits - 90% of unappointed visitors to offices/hubs are seen within 15 minutes of arrival and 90% of appointed visitors to offices/hubs are seen within five minutes of appointment
- Letter - Customers can expect a full response within 5 working days. If the enquiry is complex and we need more time to respond we will agree a response timescale with you.

74. Jigsaw Homes Group is committed to responding early to complaints and agreeing action plans with customers on how their complaint will be dealt with. We will provide support to complainants as outlined in the policy.
75. Where appropriate, we will offer ‘self-help’ options to resolve more minor nuisance issues e.g. encouraging complainants to talk to the complaint subject, seeking to resolve the issue amicably without recourse to the landlord.
76. We will investigate the anti-social behaviour complaints as fully as possible, without pre-conceptions as to the outcome. Where necessary we will seek ways of independently corroborating or refuting allegations by interviewing other witnesses/local neighbours; using sound recording equipment/applications; requesting information from other agencies etc.
77. Where ever possible, we will contact the complaint subject to discuss complaints while maintaining the confidentiality of the complainant. It is important that those who are the subject of complaints are given the opportunity to explain their actions and improve/rectify their behaviour.
78. Jigsaw Homes Group does not deal with complaints in isolation and the complainant will need to support any required actions to resolve the anti-social behaviour. We expect complainants to provide an honest account of the issues, maintain confidentiality and the integrity of any investigation. If maliciousness motivates a complaint, action may be taken against the complainant.
79. Jigsaw Homes Group is committed to getting services right first time, and ensuring that we accept responsibility and accountability when this does not happen. If the customer, the complainant or the complaint subject is unhappy with the service they have received they can make a formal complaint in accordance with our Complaints Policy. Details of which are on our website [www.jigsawhomes.org.uk/complaints/](http://www.jigsawhomes.org.uk/complaints/)

#### **4.1. Community Trigger**

80. A complainant has the legal right to request a case review where they believe no action has been taken to address their complaint(s) of anti-social behaviour by Jigsaw Homes Group, the local authority, police force and/or any Clinical Commissioning Group i.e. health teams.
81. In order to request a case review a locally agreed threshold must be met. This is different for each local authority area in which we operate. Details of the Community Trigger and how to request a review are published on each local authority’s website.
82. Complainants can contact us direct if they wish to invoke the Community Trigger and require more information.

## 5 Monitoring and Delivery

83. Jigsaw Homes Group will monitor the effectiveness of its anti-social behaviour service through customer satisfaction. The Group has set a Key Performance Indicator of achieving at least 75% satisfaction in the way the case has been handled each quarter.
84. Performance will be reported to the Executive Management Team every month and to Group Board every quarter.
85. Any dissatisfaction with our service will be reviewed by managers and where appropriate improvements will be made to service delivery.

## 6 Legislation and Regulation

- Section 218A (3) to (6) of Housing Act 1996 -relating to the requirement to publish a statement of anti-social behaviour policy and procedure; the review of the statement and how it must be available to the public
- Housing Act 1985 (as amended)
- Housing Act 1988 (as amended)
- Anti-Social Behaviour, Crime and Policing Act 2014 (Parts 1-6)
- Home Office Statutory Guidance for frontline professionals in relation to the above act (updated December 2017)
- Ministry of Justice Pre-Action Protocol for Possession Claims by Social Landlords
- Human Rights Act 1988
- Equality Act 2010
- HCA Neighbourhood and Community Standard (April 2012).

## 7 Related Policies and Procedures

- Customer Contact Strategy
- Safeguarding Children and Adults Policy and Procedures
- Data Protection Policy
- Complaints Policy
- Unreasonable Behaviour Policy (towards Jigsaw Homes representatives)
- Anti-Social Behaviour Resource Manual (being developed).



## 8 Glossary

- 86. Alternative sub-culture - is a broad term to define a strong sense of collective identity and a set of group-specific values and tastes. This typically centres on distinctive style, clothing, make up, body art and music preference i.e. Goths, Emos, Punks, Metallars etc.
- 87. DASH - is an acronym used to describe Domestic Abuse, Stalking and Harassment and Honour Based Violence
- 88. Victim - includes any person affected by the anti-social behaviour
- 89. Witness - refers to any person who has seen or heard the anti-social behaviour complained about. It also includes individuals providing evidence in support of legal action
- 90. Complainant - is the person who is making a complaint
- 91. Complaint Subject - is the person who the complaint is about.

## 9 Document Control

---

Responsible Officer/s:	Emma Wilson, Group Director of Neighbourhoods
Date of Approval:	14 November 2018
Approved by:	Group Board
To be Reviewed Every:	Three years

---

Table 1



## Creating homes. Building lives.

Jigsaw Homes Group Ltd.

Cavendish 249  
Cavendish Street  
Ashton-under-Lyne  
OL6 7AT

<https://www.jigsawhomes.org.uk>  
0300 111 1133  
[info@jigsawhomes.org.uk](mailto:info@jigsawhomes.org.uk)

Regulated by the Regulator of Social Housing Registration No. LH 4345

Registered under the Co-operative and Community Benefit Societies Act 2014 Registration No. 29433R

Document produced on 20 November 2018.