

Anti-Social Behaviour Framework - Housing Landlord Services 2025-2027



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Introduction

South Holland District Council (SHDC) is committed to ensuring its homes and communities are safe and welcoming for both tenants and visitors, free from the negative impacts of crime and anti-social behaviour (ASB).

The Council has an important role in managing estates, neighbourhoods, and communities. This new Framework aims to improve service delivery and address ASB more effectively in our role of a social landlord, emphasising our commitment to creating a safe and supportive environment for all our tenants. The document outlines SHDC's priorities for both preventing and addressing ASB.

Whenever the document mentions ASB, it encompasses hate crime. The scope of this Framework applies to all tenants, leaseholders, and licensees of the Council's Housing Service, their household and visitors, regardless of tenure, and to the buildings and neighbourhoods in which we operate.

Purpose

The ASB Framework outlines our commitment to address anti-social behaviour through early intervention, support, and enforcement.

The Council acknowledges that tackling anti-social behaviour requires collaboration with partner agencies. The Council is committed to multi-agency problem-solving and will work with various agencies, including statutory, non-statutory, and voluntary organisations, to reduce the prevalence and impact of anti-social behaviour. This collaborative approach ensures that both victims and perpetrators receive support tailored to their specific needs and circumstances.

This new Framework clearly outlines the Council's approach as a landlord, while also highlighting our commitment to tenant engagement and our ongoing Housing Transformation and Service Improvement Programme.

What is Anti-Social Behaviour?

The term anti-social behaviour (ASB) can relate to a range of activities from serious criminal activity to communal or environmental nuisance.

Part 1 of the Anti-social Behaviour, Crime and Policing Act 2014 defines ASB as:

- a) conduct that has caused, or is likely to cause, harassment, alarm, or distress to any person,
- b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- c) conduct capable of causing housing-related nuisance or annoyance to any person.

Hate crime as defined by the police and the Crown Prosecution Service is “Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person’s age or perceived age, disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity.”

National Context

ASB legislation

The Crime and Policing Act 1998 imposes a statutory duty on councils to work with the police and other agencies to reduce crime and anti-social behaviour. The Council fulfils this duty through the Community Safety Partnership. This collaborative approach ensures a coordinated response to ASB and crime, enhancing the safety and well-being of the community.

The Anti-Social Behaviour, Crime and Policing Act 2014 sets out six effective powers, placing a focus on the impact of ASB on victims and their needs. While SHDC has been utilising many of these powers, such as civil injunctions and Community Protection Notices, this Framework outlines how we will collaborate with partners and stakeholders to tackle high-impact ASB, crime, and reduce the harm caused to victims.

Regulatory Framework

In response to the Grenfell Tower tragedy in 2017, the Government introduced the Charter for Social Housing Tenants – Social Housing White Paper 2020. This initiative focusses on ensuring social housing tenants are treated with respect. The white paper highlights that social housing tenants are more likely to experience ASB and be victims of crime than those in other tenures.

The Regulator of Social Housing launched its new regulatory Framework on 1st April 2024. The standards related to ASB are part of the Consumer Standards including Neighbourhood and Community Standard, which states that Registered providers “must work in partnership with appropriate local authority departments, the police and other relevant organisations to deter and tackle anti-social behaviour (ASB) and hate incidents in the neighbourhoods where they provide social housing”.

Barriers to reporting Anti-Social Behaviour (ASB)

Before we can tackle ASB, it needs to be reported. Research by Resolve and YouGov found that 53% of people who experienced or witnessed ASB did not report it to anyone. This means that many ASB incidents go unreported and therefore unaddressed.

Why this matters:

- When ASB isn't reported, it isn't recorded or dealt with, leading to a lack of satisfaction with how these issues are handled.
- If people believe ASB won't be addressed, they are less likely to report it, creating a continuous cycle of ASB.
- It's crucial to break this cycle, as landlords we want to tackle ASB.

The Council has an online reporting system established on the website as well as options for tenants to report concerns to us by telephone, email and at Sheltered Housing Meet and Greet sessions.

Local Context

The Council is the largest social housing landlord in the district, managing over 3,800 homes. New tenants are offered introductory tenancies, which serve as a 12-month trial period before transitioning to secure tenancies. Secure tenancies provide long-term stability and additional rights, such as the right to buy, mutual exchange, assignment, succession or right to make home improvements with permission.

The Council actively works in partnership with various local organisations to enhance community safety and well-being including Anti-Social Behaviour Risk Assessment Conference and the Vulnerable Adult Panel. These meetings aim to reduce risk and problem-solve cases involving ASB and vulnerabilities. These collaborative efforts ensure a coordinated and effective approach to tackling ASB and enhancing community safety. By leveraging these partnerships, SHDC aims to create a more supportive and responsive environment for tenants, ensuring that their concerns are addressed promptly and comprehensively.

Housing Landlord Service ASB Data

A review of 2024 ASB cases highlighted that 96 households reported cases of ASB to the Housing Landlord Service. The highest number of cases were reported in February (15 cases), and the lowest being two cases per month. Improvements in ASB data collection will be introduced in 2025/2026, allowing us to benchmark our performance.

ASB CASES REPORTED TO HOUSING DURING 2024						
Month		Cases		Month		Cases
January		8		July		5
February		15		August		12
March		11		September		3
April		14		October		2
May		14		November		2
June		14		December		2

TYPES OF ASB REPORTED TO HOUSING DURING 2024		
Type	Number	Percentage
Noise Complaints	38	40%
Behavioural Issues	19	20%
Vehicle-Related Issues	14	15%
Drug-Related Issues	10	10%
Pet-Related Issues	7	7%
Garden-Related Issues	5	5%
Financial Exploitation	3	3%
Total	96	100%

Last year's data shows that noise and behaviour were the two most reported issues. It is important that we continue to track the types of reports to identify any trends and use this to improve and shape our service, equally we will focus on how we can tackle these areas as part of our action plan.

Tenant Satisfaction Measure Data

Tenants participated in the tenant perception measure surveys (2024/2025) as part of the new regulatory performance regime. Overall satisfaction with the housing landlord was 74%, and 83% of tenants felt the Council treated them fairly and with respect. Tenants were further asked, 'how satisfied or dissatisfied are you with the Council's approach to handling Anti-Social Behaviour' which was 69% (an increase of 19% from the previous year). When benchmarked against other registered providers, SHDC's satisfaction with ASB case handling was average and indicates room for improvement.

Our approach to ASB and neighbour nuisance

The Council is dedicated to supporting tenants in maintaining their tenancies and ensuring a safe and harmonious living environment. Our commitment includes making every reasonable effort to prevent acts of anti-social behaviour. While most tenants will benefit from information and advice, some may require additional support.

To proactively address ASB and neighbour nuisance, we have implemented the following measures:

- **Policy:** SHDC has a comprehensive allocation and lettings policy and Tenancy and Estate Management policies.
- **Introductory Tenancies:** All first-time council tenants are provided with an introductory tenancy to help them settle in and understand their responsibilities.
- **Settling-In Visits:** Conducted at 1, 3, and 9 months for introductory tenants to reinforce tenant obligations, provide support, identify any vulnerabilities, and

provide early intervention including extending tenancies where concerns are encountered.

- **Regular estate and flat scheme inspections:** To monitor and address any emerging issues promptly.
- **Partnership Meetings:** Participation in meetings such as Case Reviews, Vulnerable Adults Panel and Anti-Social Behaviour Risk Assessment Conference to enhance partnership working and holding agencies to account.

We have reflected on our approach to case management of ASB:

- We sometimes misidentify tenants as ASB perpetrators or confuse neighbour disputes with ASB, which can inadvertently escalate tensions between neighbours.
- Feedback from recent tenant engagement events suggests that we rely too much on diary sheets for tenants to record neighbour issues, instead of encouraging better communication and early intervention. It is important to keep promoting safe and effective communication between tenants, as this can help prevent problems from escalating.
- Tenants have told us that they did not feel well communicated with before, during and after the investigation of ASB, and worse, some tenants felt their complaint was not taken seriously or not dealt with all. We will ensure our policies and staff training provide clear advice on communication with tenants and include a range of options for tenants to report issues.
- Introducing a Good Neighbour Guide alongside the ASB Policy will help distinguish between these issues. We will clearly explain how this guide can help and what support we can offer, including ongoing mediation services to resolve disputes before they escalate (including between Council tenants and private residents).
- We recognise that our current Tenancy Management Policy includes a section on anti-social behaviour (ASB). However, we believe that a standalone ASB policy will better support our housing officers in managing these issues and tenants in understanding our process. The policy will also set out timeframes for responding to reports of ASB, legal tools available and when they can be used, oversight of cases.

Vision and priorities of the Housing Landlord Service

What this means for tenants:

- We will make sure tenants understand their rights and responsibilities when it comes to ASB.
- We will show strong leadership and commitment to tackling ASB, working closely with other local agencies.
- There will be a focus on preventing ASB, with measures tailored to the needs of our tenants.

- We will take prompt and decisive action to deal with ASB before it escalates, using all available tools and legal powers.
- We will ensure tenants can easily report ASB and will be kept informed about the status of their case. If the Council as the landlord is not responsible, we will guide tenants to the right place.
- We will provide support to those affected by ASB.
- Our goal is to ensure that every case of ASB is addressed, with clear actions agreed upon with those who report the issues.

The ASB Framework is built on four priorities to develop and improve our service:

<p>1. Prevention and Early Intervention</p> <p>Focus on preventing ASB through proactive steps and early involvement. This includes identifying potential issues early and improving awareness of ASB through community projects, communication campaigns, and educational programmes.</p>	<p>2. Working Together</p> <p>Work together with agencies, community groups, and tenants. This includes working closely with the police, health services, education providers, and other stakeholders to create a safer community.</p>
<p>3. Risk Management and Victim Support</p> <p>Support victims to reduce the impact ASB has on their health and well-being. This includes seeking legal advice, supporting victims in accessing counselling and other support services. Additionally, managing risks associated with ASB by implementing enforcement measures and support for perpetrators to prevent reoccurrence.</p>	<p>4. Putting Tenants First</p> <p>Ensure that tenants are at the heart of our approach to ASB. The Council is committed to involving tenants in the delivery of the ASB service and will work with stakeholders and tenants to ensure they are involved in creating the new ASB policy. The Council will measure and report on the satisfaction from tenants and take lessons learned from feedback to further develop the service.</p>

We will periodically review our priorities with tenants and colleagues to ensure we achieve the desired outcomes. We will adjust our efforts based on tenant feedback as we implement these initiatives.

Priority 1 Prevention and Early Intervention

Being proactive and responding early are key strategies in effectively addressing anti-social behaviour (ASB). By preventing ASB before it starts and quickly addressing any reports, we can stop issues from escalating.

We will:

- Communicate to tenants in meaningful and consistent ways, being clear about what is achievable to manage expectations.
- Increase awareness of what ASB is and what services are available.
- Raise awareness on hate crime.
- Self-assess against Housing Ombudsman spotlight reports relating to ASB.
- Share data and intelligence between agencies.
- Empower our communities and tenants not to tolerate ASB.
- Prevent ASB where possible through timely and appropriate interventions such as sending warning letters, offering mediation, and using Acceptable Behaviour Contracts.
- Involve victims when closing cases.
- Develop a comprehensive training plan for staff.

How will we get there?

We will develop and implement a comprehensive ASB policy and a 'Good Neighbour' Guide to set out our approach to ASB and hate crimes, involving tenants in its creation through surveys, focus groups, and community meetings. This ensures the policy reflects their concerns and needs.

We will reinforce information about ASB, expected behaviour standards, and potential sanctions at tenancy sign-up stage and during the introductory tenancy phase.

Housing Officers will complete a comprehensive training plan, focusing on legal tools and powers to tackle ASB, as well as training on mental health, drugs and alcohol, and domestic abuse.

When formal intervention is necessary, we will take a risk-based approach, considering both the risk to victims and their preferences. We will act quickly if perpetrators choose not to engage with support and their behaviour does not improve. Key Performance Indicators (KPIs) will be adopted to monitor service delivery and effectiveness.

We will raise awareness about ASB and available services. We will ensure consistent and clear communication with tenants through revised documentation (reviewed with tenants), focusing on prevention and resolution. We will clearly communicate what constitutes a breach of tenancy and its consequences with tenants.

We will conduct self-assessments in response to Housing Ombudsman spotlight reports to ensure our procedures are effective.

We will maintain strong partnerships with various agencies and share data to identify patterns of behaviour, crime, and ASB. Empowering our communities and tenants to challenge and report ASB safely will be a priority, along with timely interventions such as warning letters, mediation, and Acceptable Behaviour Contracts.

Priority 2 Working Together

Effective management of Anti-Social Behaviour (ASB) requires a coordinated effort from police, local authorities, and community agencies. By working together, we can provide comprehensive support to victims and address ASB more effectively.

We will:

- Promote the use of ASB case reviews where complainants are experiencing persistent anti-social behaviour.
- Develop closer relationships with local policing teams across the district.
- Work closely with the wider Council to swiftly investigate and resolve ASB and noise complaints.
- Encourage and facilitate community involvement among tenants, including how individuals can support other members of their community to help us and our partners tackle ASB issues.

How will we get there?

To tackle anti-social behaviour (ASB), we will work with multiple agencies for serious cases and hold regular meetings. We will keep reviewing our support services to make sure they cover everything needed. We will promote ASB case reviews to help those facing persistent issues and complete checks on ASB cases to ensure correct case management and policy adoption.

We will set clear expectations and build strong ties with local police to boost community safety. Housing Officers will use a case management system for efficient case management (allowing greater oversight and performance reporting).

We will also strengthen connections with Adult and Children Services, Mental Health Services, substance misuse and Probation, including community payback initiatives.

We will formalise working arrangements and responses from the Community Safety Team and Environmental Protection team, improving outcomes for tenants.

We will promote positive outcomes to tenants (online and in the tenant annual report) and partner agencies, ensuring that residents are informed of successful enforcement action.

Priority 3 Risk Management and Victim Support

Anti-Social Behaviour (ASB) can leave victims feeling unsafe and afraid in their own homes, often feeling unheard. Our approach places the individual at the heart of our response.

We will:

- Complete risk assessments to assess harm and prioritise cases.
- Focus on the harm and impact on the victim.
- Increase accessibility to the service and a faster response.
- Ensure staff are trained on assessing the needs of victims and witnesses, particularly where victims and witnesses are vulnerable.
- Improve the experience for victims and witnesses through positive engagement, support and understanding.
- Identify repeat and vulnerable victims, ensuring that appropriate support is in place.
- Agree action plans with victims, updating them regularly and inform them directly of key developments.

How will we get there?

Officers will adopt a harm-based approach to address the risks associated with ASB. This means prioritising and addressing the most serious behaviours that significantly impact people's lives. The Regulator of Social Housing expects housing providers to take a victim-focused approach when dealing with ASB reports. This involves identifying and supporting those most vulnerable to ASB to ensure their needs are met.

We will establish a case management procedure to ensure a consistent and fair approach for those accessing the service, including a dedicated case officer, proportionate action plan, and regular communication. Advice, tools, and support will also be offered to tenants to help resolve issues with neighbours that do not meet the ASB intervention threshold.

Processes for recording tenant vulnerabilities will be continuously reviewed and improved to ensure accurate recording. Identified issues or vulnerabilities will be considered when determining support for all parties involved. Victims will be informed about their options and the actions that can be taken on their behalf to ensure they feel empowered throughout the process. Regular case reviews will be conducted, listening to victims' needs to ensure an effective response.

Safeguarding concerns will be promptly raised and shared between relevant agencies for comprehensive support. Sensitive lettings and local plans will be used to manage neighbourhoods and support community cohesion. Victims and witnesses will receive support with attending court where necessary and collaboration with Victim Support and other organisations will provide holistic support to victims.

Priority 4 Putting Tenants First

Our approach to anti-social behaviour (ASB) should be shaped by our tenants. We will ensure tenants have a voice to express their concerns about what matters most to them.

We will:

- Explore the terminology used for with tenants, including establishing whether “victim” and “perpetrator” are appropriate.
- Regularly involve tenants, so that they can be sure their voice is being heard and acted upon.
- Ensure tenants lead the way in shaping our response to ASB.
- Use feedback and lessons learned to enhance our services.
- Review our ASB reporting, communication, and engagement methods with tenants.

How will we get there?

To tackle ASB, we will make sure our approach is shaped by tenants, giving them a voice to share their concerns. We will encourage tenant-led initiatives like focus groups, community engagement events and activities that promote positive interactions. Feedback will be gathered through a variety of means such as online portals, surveys, walkabout exercises and community meetings.

Clear and accessible communication channels will be established for reporting ASB, and we will keep everyone informed by clearly communicating the steps taken in response to ASB reports and providing regular updates. We will highlight support for vulnerable tenants through partnerships with specialised services. Staff will receive regular training to stay updated on new tools and best practices.

We will develop online resources, including an ASB toolkit, and share information on ASB service standards and the case review process on our website.

We will identify and address barriers that prevent tenants from reporting ASB confidently, including reviewing web content and template letters.

Measuring success

We will benchmark our performance against other against other housing providers locally and nationally, through Housemark and Tenant Satisfaction Measures.

To measure success in preventing and addressing anti-social behaviour (ASB) early, we will track the follow:

- number of ASB cases reported.
- tenant satisfaction on our approach to ASB.
- ASB case resolution rates.
- awareness and engagement levels from tenants.
- success of early intervention.
- reduction in ASB from new tenants.
- ASB case enforcement rates.

Success in managing ASB through partnership working will be measured by the effectiveness of partnerships measured by:

- case review outcomes.

- response times from partner agencies.
- reduction in crime and disorder following data sharing and analysis.
- enforcement action taken by and/or in conjunction with other parties.
- improvements in response to learnings following case reviews.

To ensure effective risk management and support for victims, we will monitor:

- risk assessment completion rates.
- feedback about support services.
- accessibility of reporting channels.
- enhanced repairs response to ASB victims.
- safeguarding coordination.
- effectiveness of court support.

Tenant feedback will be utilised to design and re-design the service as part of a regular ongoing review. Success in putting tenants first will be measured by

- volume and examples of tenant involvement.
- tenant voice being captured as part of Member decision making.
- tenant feedback on our approach to involvement.
- enhanced template letters based on tenant feedback.
- co-producing an ASB and hate crime policy with tenants.

We will report our performance to tenants and Members to offer assurance and transparency.

Monitoring and review

Ownership of this Strategy rests with Housing Services Manager who is responsible for agreeing, monitoring, promoting, and reviewing its implementation. An action plan has been developed to support this Framework, see appendix A.

The ASB Housing Lead will present monthly performance reports at the Housing Compliance and Governance Clinic meetings (of which the Portfolio Holder for Strategic and Operational Housing attends). As part of the Framework priorities, Key Performance Indicators will be established and reported quarterly to Senior Leadership Team and Members at Performance Monitoring Panel as part of wider Service Performance updates. In addition, annual performance on ASB management will be provided to Performance Monitoring Panel and Cabinet as part of the Crime and Disorder Update.

To ensure the effective delivery of the ASB Framework, the ASB Housing Lead will implement the action plan as set out at the end of this document. It is likely that further legislation, guidance, and funding arrangements will continue to change. New actions and targets may be agreed if further changes are made to corporate objectives, national legislation, and policy.

An annual update on the Framework will be provided to Cabinet and published on our website for tenants to review. This review will incorporate statistical and perception-based analysis of our ASB cases and impact on victims.

Equality and Diversity

The ASB Framework recognises the impact of ASB on our entire community, while acknowledging that certain groups or individuals may be more vulnerable due to factors such as age, disability, gender, race, religion, sexual orientation, marital status, and gender reassignment.

We deliver services to a diverse range of people and so it is important that we understand more about them so that:

- When we develop or review services, policies, and procedures we can be sure that our services are inclusive.
- When we plan engagement activities, we can develop methods that are of interest to relevant groups.
- When we test services, we do so from a wide range of perspectives.
- When we ask for views and ideas, we do so from a wide range of perspectives.

An Equality Impact Assessment (EIA) has been completed on this Framework to ensure inclusivity. The EIA process will help identify any potential negative impacts on protected groups under equalities legislation and ensure they are mitigated. The assessment also maximises opportunities for positive impact, ensuring that our approach is fair and equitable.

The Framework is supported by what we know about our tenants. We will seek to ensure we have representative views when considering service wide issues, and local area views when engaging at a local level.

Conclusion

This Framework represents our dedication to fostering a safer community, and we look forward to working together with our tenants and community partners to achieve this goal.

The success of the Framework will be measured by the meaningful participation of our tenants, by developing comprehensive online resources, investing in staff training and equipment, fostering consistent engagement, and addressing barriers to reporting. In response, we aim to create a community where tenants feel safe, where their voices are heard and valued.

Through a commitment to continuous improvement based on tenant feedback, we will ensure our services are responsive and reflective of the needs of tenants.

Appendix A - Action Plan

Priority 1: Prevention and Early Intervention

Action	Lead Officer	Timescale
Raise awareness through a communications plan of the impacts of hate crime and make it clear that hate crime, harassment and bullying in any form will not be tolerated.	Housing Services Manager	Ongoing
Complete a self-assessment against the Housing Ombudsman spotlight report on noise nuisance	ASB Housing Lead	August 2025
KPIs established to monitor current performance (to be reported to Housing Compliance Clinic and published online quarterly)	ASB Housing Lead	August 2025
Review sign-up process for tenants and introductory visits process from an ASB perspective.	Housing Services Manager	September 2025
Promote a variety of methods through which to report ASB, including via our website/email and telephone to increase accessibility to the service.	ASB Housing Lead	September 2025
Create a good neighbour guide with information on conflict resolution of what ASB is and the services available to tenants. (Consulting tenants)	ASB Housing Lead	November 2025
Create a new ASB and hate crime policy developed with tenants including enhanced suite of KPIs	ASB Housing Lead	February 2026
Invest in staff training focusing on legal and non-legal tools and powers to tackle ASB, ASB case management, as well as training on mental health, hate crime, substance misuse, and domestic abuse and restorative approaches.	Housing Services Manager	December 2025

Priority 2: Working Together

Action	Lead officer	Timescale
Review current practices and thresholds for access to support services to ensure no one falls through the gap	ASB Housing Lead	Ongoing
Conduct annual reviews with the Environmental Protection team to review internal procedures for noise complaints	ASB Housing Lead	Ongoing
Subscribe to the ASB Help Pledge	ASB Housing Lead	August 2025
Promote ASB case reviews 'Community Trigger'	ASB Housing Lead	April 2026
Develop a service level agreement with the Community Safety Team and Environmental Protection Team	Housing Services Manager	April 2026
Develop closer relationships with partners such as the local police, adult and children services, mental health services and probation teams.	ASB Housing Lead	April 2026

Priority 3: Risk management and Victim Support

Action	Lead officer	Timescale
Invest in noise recording equipment, review approach to supporting tenants using Noise App.	ASB Housing Lead	August 2025
Review the current service provision around tenancy support and the support provided to alleged perpetrators of ASB. Promoting this with tenants, Members and staff.	Housing Services Manager	September 2025
Work in partnership with Victim Support, ASB Help and Resolve, sign up to ASB Help Pledge	ASB Housing Lead	September 2025
Determine approach to risk assessments to support victims and understand impact ASB is having	Housing Services Manager/ASB Housing Lead	September 2025
Conduct regular sample audits of ASB cases to ensure case management is reflecting procedures and policy.	Housing Services Manager	November 2025

Review internal processes for recording tenant vulnerabilities	Housing Services Manager	April 2026
Implement training sessions for Officers on the ASB procedures.	ASB Housing Lead	April 2026
Review responsive repairs timescales for victims of ASB.	Housing Transformation Programme Manager	April 2026

Priority 4: Putting Tenants first

Action	Lead officer	Timescale
Review language used in communications with tenants including “victim” and “perpetrator”	Tenant Engagement and Influence Lead	September 2025
Review web content and letter templates with tenants	ASB Housing Lead	December 2025
Implement an ASB tool kit for tenants which outlines what the Council can do, what tenants can do and what other agencies can do when it comes to responding to ASB.	Housing Services Manager	December 2025
Involve tenants in developing policies and procedures on our approach to responding to ASB, hate crime and neighbour disputes.	ASB Housing Lead	February 2026
Improve data reporting on ASB to tenants, Members and Senior Officers	ASB Housing Lead	April 2026
Introduce mechanism for victims to be able to provide feedback on the service they experienced.	Tenant Engagement and Influence Lead	April 2026

*Note that these timescales may need to be revised following the outcome of the Council’s programmed inspection by the Regulator of Social Housing (due for completion during July 2025).