



ALBYN HOUSING SOCIETY LTD

TITLE: MANAGING ANTI-SOCIAL AND NUISANCE BEHAVIOUR POLICY

Authorised by Committee of Management	January 2010
Next Review Due By	January 2013 (currently under review)
Staff Affected	Housing Management Allocations Housing Support Property Maintenance
Lead Officers	Policy: Housing & Communities Director Operation: Housing and Communities Manager Housing Management Team Leader

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Purpose

The overall purpose (aim) of this policy is:

- To create and maintain safe neighbourhoods, where people chose to live

The key objectives of this policy are:

- To reduce incidences of anti-social behaviour in our communities
- To intervene early to manage and contain anti-social behaviour when it occurs
- To sustain tenancies and keep people in their homes wherever possible
- To be clear for staff and residents and simple to implement

Scope

This policy applies to all complaints of nuisance or anti-social behaviour or harassment made against any of our tenants, members of their households, or their visitors. It applies to all rented tenures managed by us, including:

- Scottish Secure Tenancies
- Short Scottish Secure Tenancies
- Occupancy Agreements
- Short Assured Tenancies
- Supported Tenancies
- Garage Tenancies

We have no legal powers over residents who are not our tenants.

Complaints may be received from our tenants or others about neighbouring residents in other tenures. We will provide information and advice and make referrals to mediation services, where appropriate, to residents in all tenures. Where this is not appropriate or has failed, we will refer complainants to the relevant statutory authorities or independent advice services.

Definitions

Anti Social behaviour' for the purpose of his policy and associated documents is defined as:

Behaviour which has caused or is likely to cause alarm or distress, nuisance or annoyance to any person in the neighbourhood, or causing damage to anyone's property. It includes behaviour that displays a disregard for the rights and wellbeing of others. People affected may include residents, visitors, our employees, agents and contractors.

We recognise that antisocial behaviour can mean different things to different people. Our definition is therefore flexible, and recognises that it does not necessarily include behaviour that is different to the neighbouring majority. We will take into account the impact of the behaviour on the wider community

Policy Statements

General Principles

We recognise the rights of our tenants and residents in our communities to the peaceful enjoyment of their homes. We also expect our residents to act responsibly and with consideration for others; and to respect the values and lifestyles of others within their communities.

- We aim to listen and act on concerns reported to us by members of our communities
- We will act swiftly to respond to complaints. We will try to resolve complaints at an early stage to prevent them escalating into more serious problems.
- We recognise that complaints may be unfounded, discriminatory or even malicious in some cases. And so we will adopt a non-judgemental approach at the early stages of investigation of any complaint.
- Where anti social or nuisance behaviour is clearly evident, we will be proactive and supportive to victims in our approach
- We will work closely with residents and develop good, effective relationships with a range of agencies to develop shared priorities for action, and to gather good information and evidence to support intervention where it is required.
- We will at all times try to balance the rights of individuals with the expectations of the wider community. But we will act with determination against the small minority of our residents who act in an anti-social manner. Where complaints can not be resolved at an early stage, we will use every type of measure, tool or approach necessary and available to us to create the change required

Prevention

We will carry out the following actions to make sure that anti-social and neighbourhood problems are prevented or minimised as far as possible:

- We will build and maintain our homes and neighbourhoods to 'secure by design' standards and make sure we meet the Scottish Housing Quality Standards for safety and security within our existing homes.
- We will make sure our empty homes are brought up to an acceptable standard and re-let as quickly as possible
- We will allocate properties sensitively to achieve mixed and balanced communities as far as is possible and within the boundaries of the Allocations Policy. This may include referrals to the appropriate Anti Social Behaviour Partnership group for a risk assessment before an offer of housing is made where the criteria set out in the Allocations Policy apply.

- We will advise tenants on their options for transfer and exchanges where disputes between individual neighbours can not be resolved
- We will sign new tenants up to a Scottish Secure tenancy agreement (SST) that outlines their rights and responsibilities on anti-social behaviour.
- We may sign new tenants to Short Scottish Secure tenancy agreements (Short SST) where:
 - The applicant has been evicted for anti-social behaviour from a tenancy in Scotland, England, Wales or Northern Ireland, within 3 years of the tenancy offer
 - The tenant or any member of their household are the subject of an ASBO granted on or after 30 September 2002 under s 19 of the Crime and Disorder Act 1998;

Where a Short SST is awarded, we will provide or ensure the availability of appropriate support to enable the subsequent conversion to a full SST within 12 months.

- Our expectations will be clearly outlined to new tenants as part of their tenancy sign up and new tenancy interviews; and will ask new tenants to sign a neighbourhood Agreement at the start of their tenancy.
- We will deal with estate management problems such as vandalism or abandoned items quickly to prevent minor issues from becoming more serious
- We will consult tenants on our policies and practices for managing anti-social behaviour.
- We will provide information and advice for tenants on how to deal with complaints between neighbours in leaflets, newsletters, handbooks and on our website
- Where available, we will provide housing support or refer tenants to other agencies as appropriate to help tenants sustain a successful tenancy and to live peacefully with their neighbours
- We will take an active part in multi-agency meetings to develop joint approaches and actions to prevent and manage anti-social behaviour within our communities
- We will support community groups and locally based initiatives across our area of operation within the resources available to us that:
 - support and develop community confidence to report and challenge anti-social behaviour when it happens in their communities;
 - provide support, education and diversionary activities that stop problems occurring or prevent future issues arising

- We will have a protocol with appropriate Statutory Agencies to share information and take joint actions in relation to anti-social behaviour

Receiving and Prioritising Complaints

- We will develop clear procedures to support this policy that detail how we will respond to reports of anti-social behaviour and neighbour disputes, as well as the methods we will use to investigate them and the appropriate action to be taken:
- We will receive complaints by letter, phone, email or in an interview. Anonymous complaints will be recorded, but will not normally be acted on unless they can be verified by other means.
- All complaints received will be logged and categorised within 2 categories. The behaviours listed within these categories are not intended to be exhaustive, but to provide an indicative guide of the appropriate category for the range of complaints we will receive.

Category 1 – Serious

Complaints will be placed in this category where a clear breach of tenancy has occurred that affects other people. It has been witnessed and corroborated by two or more other residents, or by an appropriate agency, such as the police or a community warden.

This type of behaviour may include but is not restricted to the following:

- criminal activities, including drug dealing
- unprovoked assaults
- violence, harassment or abuse, including racially motivated incidents
- frequent serious disturbances or damage to property

We will generally act independently or with other agencies to tackle these cases. They will generally result in some form of legal action if the offending behaviour is not stopped after initial warnings.

Category 2 – Routine

All other complaints will be placed in this category. They will include disputes where there is no clear breach of tenancy, or where only two neighbours are involved and others in the vicinity remain unaffected (unless there is evidence of deliberate harassment)

In these instances, we will generally be unable to make an intervention, either because there is a lack of witnesses or other evidence to corroborate events, or because legal measures would be inappropriate.

In such cases, we will generally provide general advice and information to help tenants solve issues between themselves, and may refer the parties concerned to a more appropriate agency such as Community Mediation.

Thereafter we will monitor the dispute until such time as it is brought to a conclusion.

- Occasional or non-deliberate disturbances and nuisance behaviour will not be categorised as anti-social behaviour, and will be dealt with in accordance with our Estate Management Policy and Procedures.

Interventions

- We will respond to all complaints as quickly as possible. Where necessary, we will prioritise the most serious complaints to make sure they can be investigated first.
- We will acknowledge **Category 1** complaints in writing immediately, and aim to make initial contact and update the complainant by phone or in person within 3 working days.
- We will acknowledge Category 2 complaints in writing within 5 working days, and aim to contact to the complainant by phone or in person within 10 working days
- These are timescales for initial responses. Timescales for further action and involvement will depend on the complexity of the case, and may depend on the availability of witnesses or responses from other agencies. We aim to contact the complainant to update them with progress within two weeks of our initial contact.
- When a complaint is received, we will establish the facts and interview the complainant, using standard logging and case report forms. We will assess the complaint to decide if it is a tenancy matter or a criminal issue, or both. We will confirm the appropriate category for the complaint, what action should be taken, and whether other agencies need to be involved.
- We aim to conclude our investigations and to take any action that is necessary to resolve a complaint as quickly as possible. We aim to achieve a positive outcome for all concerned, and will employ a range of options to resolve situations on a case by case basis. These will include but not be restricted to:
 - Interviewing all parties and witnesses to incidents
 - Issuing warning letters, including solicitors letters, to tenants who have been anti-social
 - Recharging tenants for work they have failed to do or to cover the costs of damage caused by them, members of their household or their visitors
 - Suspending housing applications in accordance with the Highland Housing Register joint allocations policy
 - Referring residents to mediation services

- Attending case conferences with other agencies, including the police, community mental health services, social work and other council services.
 - Referring cases that can not be resolved through early intervention or that may require joint working with other agencies to the appropriate Anti Social Behaviour partnership group.
 - Issuing Acceptable Behaviour Contracts (ABCs) to make sure that tenants and their families recognise the impact of their behaviour on others, and to set out steps to change it
 - Referring cases to The Highland Council's Anti Social Behaviour Investigation Team (ASBIT) in liaison with the appropriate Anti Social Behaviour Partnership group, where behaviour impacts on several households within a neighbourhood or where we are unable to collate evidence within our own resources
 - Arranging transfers for victims of anti-social behaviour where such a move will end a problem without relocating it elsewhere
 - Working with other agencies to arrange procedures for restorative justice in appropriate circumstances
- We will not generally remain involved in routine **Category 2** incidents for more than 2 months unless new evidence or corroboration becomes available. Where no clear breach of tenancy can be established, we will provide appropriate information and advice, and refer the parties to mediation services.
 - Where a breach of tenancy has been established, we will review whether our actions have been exhausted on the basis of all the evidence reasonably available after one written warning and other intervention has taken place.
 - Where our actions have been exhausted, the parties will be provided with relevant information and advice and the case will be closed.
 - If further intervention is required, we will proceed to enforcement stages with the intention to pursue one or more legal remedies.
 - In all cases, the parties involved will be provided with a written outcome of our investigation into the complaint at this stage, including a notification of the case being closed or progressed for further enforcement action
 - Where cases become protracted, we will keep the complainant informed of progress by telephone or in writing at least once a month. We will confirm our course of action in writing with both the person making the complaint and with the person against whom any action is being taken. We will always protect the confidentiality of all parties as far as reasonably possible.

- New incidents that occur after a case has been closed will be categorised and dealt with on their own merits.

Enforcement Actions

- Where early interventions have not solved a **Category 1** complaint, we will actively pursue the most appropriate legal remedies to tackle persistent anti-social behaviour. These will include but not be restricted to the following:
 - Unacceptable Behaviour Notices (UBNs)
 - Notice of Proceedings
 - Non-renewal of Short SSTs
 - Anti Social Behaviour Orders (ASBOs)
 - Interdicts
 - Specific Implements
 - Repossession decrees
- Where relevant, we will also liaise with the police and the local authority to assist in the application of further legal powers that are available to them.
- Where we decide to take legal action in disputes, we will offer appropriate help and support to any witnesses involved.
- If an ASBO is granted against any tenant or member of their household, we may convert the tenancy to a Short Scottish Secure Tenancy in accordance with Section 35 of the Housing (Scotland) Act 2001
- We will aim to provide or refer tenants for support and to work with them before the final sanction of eviction so that a situation can be resolved to the best advantage of all parties wherever possible.
- But if we have sought and obtained a decree to evict from the Sherriff Court, it will always be our intention to enforce it through eviction.

Rehabilitation

If we take legal action and tenants are ultimately evicted because of anti-social behaviour, we have no further legal responsibility for their re-housing or rehabilitation.

We will work in partnership with other agencies as far as our resources and remit allow to develop and promote services to encourage and develop responsible and considerate behaviours of individuals and groups within our communities.

Responsibilities for Actions

- Responding to and managing complaints of anti-social behaviour is primarily the responsibility of our housing management team in Housing and Communities. Housing Officers will be responsible for the day to day implementation of policy

and procedure, and for investigating and taking appropriate action as outlined within them.

- Members of our Allocations, Community Involvement, Property Maintenance and Development teams also have a direct role to play in the delivery of this policy and the associated procedures, particularly for the development and implementation of preventative actions.
- Our Committee of Management have ultimate responsibility for agreeing the policy and for monitoring its effectiveness through regular performance reports presented to them. The Committee will also agree the enforcement of tenancy recovery actions.

Performance Monitoring

- We will record all complaints and actions taken on a database. Officers will review live cases on a regular basis to make sure actions are progressed and cases concluded as quickly as possible.
- We will contact complainants within 6 weeks of a case being closed to make sure the situation remains stable, and will carry out customer satisfaction with our handling of anti-social behaviour complaints on a regular basis.
- We will agree key performance indicators targets for managing anti social behaviour complaints with our Committee of Management on an annual basis. These will be realistic and based on our operating context.
- We will monitor our workload by individual case and by overall trends on a regular basis to make sure that we are progressing towards our targets. We will investigate causes of underperformance and identify remedial actions as quickly as possible.
- We will collate information on tenancies that fail as a result of anti social behaviour
- We will compare our performance against the performance of other relevant housing providers, and will take advantage of and share good practices wherever possible
- We will report performance to our operational sub-committees of the Committee of Management on a quarterly basis, and to our regulator on an annual basis
- We will publish our performance at the end of each financial year in an annual report, tenant newsletters and on our website

Monitoring and Review

- This policy and associated procedures will be reviewed every three years in consultation with our staff, committee members and tenants. The review will make sure that:
 - We are providing the appropriate service to meet our tenant's needs
 - We are reaching our targets for responding to complaints of anti social and nuisance behaviour in line with our operating context and business planning assumptions
 - We will assess customer satisfaction with the way we have dealt with complaints, and use the information to continually improve the service we provide
 - We continually improve residents satisfactions with their neighbourhoods as good and safe places to live
- We will review the policy and procedures to comply with and future legislative or regulatory requirements as and when they occur or at least every 3 years.

Framework

This policy has been prepared to take into account the following:

- All existing and future relevant legislative requirements, including the following:
 - Housing (Scotland) Act 2001
 - The model Scottish Secure tenancy Agreement introduced under the above act
 - The Anti-Social behaviour (Scotland) Act 2004
 - Crime and Disorder Act 1998
 - Misuse of Drugs Act 1971
 - Children (Scotland) Act 1995
 - Human Rights Act 1998
 - Disability Discrimination Act 2005
 - Data Protection Act 1998
 - Regulation of Investigatory Powers (Scotland) Act 2000
- Our Vision, Mission and Strategic Goals
- Raising Standards in Housing – Anti-Social Behaviour and Harassment (2001)
- Performance Standards – the relevant standard in relation to antisocial behaviour being:
 - Activity Standard 1.9: ‘We deal appropriately with anti-social behaviour. Where appropriate we work with others to prevent and manage such behaviour’

- Our operating context

The following publications have also been taken into account in preparing this policy:

- Internal audit recommendations
- Practice online – Chartered Institute of Housing best practice guidance
- Chartered Institute of Housing – Tackling Anti Social Behaviour in Scotland
- Scottish Government – Promoting Positive Outcomes: working together to prevent anti social behaviour in Scotland

The policy also contributes to the following strategic frameworks

- Highland Wellbeing Alliance: Anti Social Behaviour Strategy
 - Strategic outcome 3 – Improving and sustaining our environmental quality (focusing on dog fouling, litter, noise, neighbour complaints, abandoned vehicles and fire setting)
 - Strategic outcome 4 – Tackling inequalities by working with specific communities more likely to be targeted by antisocial behaviour
 - Strategic outcome 5 – Aligning public services to work better with communities and improve our planning, delivery and review of services for dealing with antisocial behaviour

Related Policies and Procedures

The following policies and procedures are directly relevant to this document:

- Guidance for Serving Notices
- Estate Management
- Tenancy Abandonment
- Allocations (Highland Housing Register joint policy & procedures)
- New Tenancies
- Rechargeable Repairs
- Void management
- Right to Purchase
- Customer Service Strategy & Service Promises
- Guidance on Effective Communication
- Equalities and Diversity Statement

We will also work towards accreditation schemes that will directly support the delivery of this policy, including the following:

- Scottish National Standards for Information and Advice Providers

Our Operating Context

Key Issues

Our policy for managing anti social and nuisance behaviour within our communities is designed to reflect particular factors within our overall context:

- A continuing active development programme with further stock growth during the policy period, especially in the south of our area
- Diverse client group
- Low wage economy
- Low levels of housing benefit entitlement relative to the general sector
- Concentration of more difficult to let stock in Caithness

Stock type, locations and numbers.

We own and manage over 2,400 properties in over 70 different towns and villages across the Highlands. Many of these larger towns also include a number of distinct schemes and settlements within them.

We manage around 3,300 individual accounts, including former tenancy accounts and charges to owners on our estates who receive factoring services from us. We have had a very active development programme in recent years, with over 400 additional units in the last 3 years including in an additional rural settlements.

Around 16% of our stock is shared ownership / shared equity. The remainder is rented, including nearly 5% of tenancies that are let as supported accommodation. Support is provided by our own and other housing support providers.

Our geography covers most of the administrative area of The Highland Council (with the exception of Lochalsh and Skye, and Lochaber), and part of The Moray Council.

Anti Social Behaviour Perceptions

Each year in our resident satisfaction surveys, we ask tenants what they think of their neighbourhood. Overall satisfaction is consistently high – nearly 90% think it is a good or very good place to live. This figure has remained high in recent years, and is above benchmark averages. Quiet neighbourhoods and good neighbours are the highest scoring factors that influence this positive perception.

Those who rate the neighbourhood as ‘poor’ are not consistently concentrated in any particular geographic area. However, where a neighbourhood is thought to be ‘poor’, anti-social neighbours are the main reason given by a clear majority, followed by noise, drugs and alcohol in equal measure.

We asked about this issue in more detail in our June 2009 ‘Policy Bulletin’ questionnaire, sent to all tenants. This is the information that came back.

What tenants describe as anti-social behaviour.

◦ Noise (loud parties and music, loud arguments)	78
◦ Disrespectful behaviour (swearing, intimidation, abusive or intimidating attitudes)	62
◦ Vandalism / damage to property / graffiti	34
◦ Dogs left to roam / fouling	28
◦ Drug use / dealing	25
◦ Violent behaviour	20
◦ Drunken behaviour	16
◦ Untidy gardens	13
◦ Litter / fly tipping	14
◦ Noise from vehicles	7
◦ Out of hand children	11

What issues should Albyn deal with?

These are the types of complaints tenants think we should deal with as a landlord

Any serious Anti social behaviour	15
Serious / persistent breaches of tenancy conditions	30
Anything that disturbs others	20
Personal issues	2

Current Caseloads

Our anti social databases currently holds basic details for all reported cases from 2006 to date. Over 2008/09, our housing team managed between 60 and 110 cases at any one time – with on average 88 cases open at the end of any period. These have been managed between 4 generic patch housing officers until summer 2009, when a fifth officer has been appointed to the team.

The historic trends are:

2006 – 286 cases

2007 – 247

2008 – 163

2009 – 75 (to mid year - September 2009)

Caseloads have fallen over the period recorded, but this is as likely to be from improvements in housekeeping rather than a sudden fall in anti-social activity.

The main category of each complaint recorded is as follows:

Category	Whole database	Current cases
Anti-social behaviour	327	43
Noise	148	8
Communal areas	59	
Pets	53	3
Harassment	25	4
Parking	25	1
Vehicles	23	
Neighbours	37	6
Drugs	21	7
Gardens	17	1
House Condition	10	
Vandalism	5	
Other	75	2
Not recorded	5	1

Formal actions were taken to resolve only a small minority of cases during the year. Most are managed and resolved by our Housing Officers without formal interventions, in common with national (UK) trends. Actions in place for current cases are as follows:

Anti Social Behaviour Contracts	1
Verbal Warning	1
Written Warning	1
Possession Notices	6

Alness	1
Aviemore	3
Avoch	1
Brora	1
Conon	4
Dingwall	4
Dornoch	1
Foyers	1
Grantown	2
Invergordon	10
Inverness	21
Kingussie	2
Kirkhill	3
Milton	8
Nairn	11
Tain	1
Wick	2

Current cases are spread across a wide geographic area and are in both urban and small communities. All current reported cases are East or Central Highlands.

The bigger settlements of Inverness; Invergordon; Dingwall/Conon; Milton and Nairn routinely have a higher proportion of all cases.

Aviemore, Grantown, Kingussie, Kirkhill and Wick also feature as relatively high levels of cases relative to stock.

It is not possible at this stage to identify any common links between types of case, broader social or economic profiles of the areas, or complainer / perpetrator profiles. Our database needs to be developed further to allow for relevant information to be collected and analysed in the future.

Officers and admin staff are spending an average of 2 hours per day on ASB work. Obviously it will fluctuate depending on particular caseloads, and will be monitored from time to time to track any significant changes. However this seems realistic to the existing active caseloads (76 – around 15 cases per officer) and other work. But it is still the equivalent of 30% of staff time spent on between 4 and 5% of our tenanted stock.

Dealing with paperwork / case files accounts for the bulk (over half) of time spent by all staff. Dealing with phone calls, home visits and liaison with other agencies follow, being almost equally split between each other.

**Proposed Performance Indicators and Targets – 2010/11
Management of Anti Social Behaviour Complaints**

Performance Indicator	Type	Target	Frequency	Purpose
Number of new cases during a quarter	Total		Quarterly	Track trends
Number of cases closed during a quarter	Total		Quarterly	Track trends
Number of active cases at end of quarter	Cumulative Total		Quarterly	Track trends
Types of ASB recorded for active cases	Count by type / area/ household type		Quarterly	Track trends
Main intervention for cases closed	Count by type and category		Quarterly	Track effectiveness of different measures & policy aims
% initial contact within category timescale	% by category	90%	Quarterly	Monitor performance
% follow up contact within timescale	% all	90%	Quarterly	Monitor performance
% Category 1 cases progressed to legal action within 6 months of initial complaint	%	50%	Quarterly	Monitor performance
% Category 2 cases closed within 6 months of initial complaint	%	75%	Quarterly	Monitor performance
Average days to resolve cases	Sum by category		Quarterly	Monitor performance
Complainant satisfaction	%	75%	Annually	Monitor performance & identify policy or procedure issues for review
Repeat cases	% + analysis by type		Annually	Assess sustainability of resolved cases

Performance Standard: AS1.9 Antisocial behaviour

Self Assessment

You may wish to ask the following self-assessment questions about our prevention and management of antisocial behaviour:

Question	Before	After	Evidence
Do we have a joint, published, Anti-social behaviour strategy ?	n/a	n/a	Local authority remit – but we actively participate and join formal partnership arrangements with the council and others to implement the local authority strategy
Do we have clear and accessible policies and procedures on the management of antisocial behaviour?	No – not up to date & no longer appropriate	Yes	New policy recommended for approval by CoM in January 2010. Procedures in development – to be completed by April 2010
Do we consult with tenants, residents and other stakeholders on the development and review of our approach to the management of antisocial behaviour?	Resident satisfaction surveys	Yes	Extensive consultation evidenced as part of policy review recommendations. Ongoing part of resident satisfaction surveys
Do our tenancy agreements include appropriate nuisance clauses and are these made clear to tenants?	Yes	Yes	Model SST clauses included in our agreements and highlighted to tenants as part of the sign up and new tenancy follow up procedures. Good Neighbour Charter to be developed as part of ongoing procedural work
Do we have a range of remedies / tools to tackle incidents of antisocial behaviour, including mediation, use of Antisocial Behaviour Orders, and the use of Short Scottish Secure Tenancies?	In part	Yes	All remedies and appropriate use of them now clearly referred to within policy & procedural guidance
Do we investigate incidents promptly and have we set challenging targets / timescales for each stage of the procedure and are we meeting these targets / timescales ?	No	Yes – & for further development	Timescales reviewed and set within policy. Monitoring framework to be developed, including development of appropriate software, during 2010/11.
Do we monitor our performance in meeting these targets / timescales and report findings to relevant stakeholders?	No	Yes – & for further development	New monitoring arrangements to be established during 2010/11
Do we have agreed liaison and referral arrangements between	Yes	Yes	Signed protocol arrangements, referrals and meetings in place

Question	Before	After	Evidence
other departments and agencies?			
Do we maintain accurate records of incidents, and monitor case progress and outcomes?	In part	Yes	Record keeping and monitoring to be standardised, simplified and monitored more effectively through development of better IT reporting tools and procedural guidance
Do we publish outcome information, including equalities information, on our management of incidents of antisocial behaviour?	No	For further development	Better performance and outcomes monitoring will provide information for publication from the end of 2010/11
Is our approach to the management of antisocial behaviour proportionate to the scale of the problem and do our services represent value for money?	?	Yes – & for further development	To be better evidenced through development of outcomes monitoring during 2010/11
Do our policies and practices on the prevention and management of antisocial behaviour positively contribute to the prevention, and resolution, of homelessness?	?	Yes	Aim and preventative role emphasised more clearly in revised policy
Do we publicise our approach to the management of antisocial behaviour, highlighting the support we can provide to tenants and other complainants?	Yes	Yes	Ongoing through use of tenancy agreement, tenant handbook, leaflets, newsletter articles and press releases as appropriate. To be updated following introduction of new policy.
Is the support and protection of victims and staff central to our approach to the management of incidents of antisocial behaviour?	?	Yes	Lone Working and Vulnerable Residents policies Clearer policy statement developed
Do we keep complainants and victims informed throughout any investigation and follow-up action?	Not consistently	Yes	Requirement included in new policy, to be backed up with procedural guidance
Do we provide access to an appeals process?	Yes	Yes	Complaints Policy and Procedures apply