



Exeter
City Council



Council Housing
& Development Services

Exeter City Council Housing & Development Services

Anti-Social Behaviour (ASB) Strategy 2024 – 2027

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Introduction

This strategy sets out our approach to preventing, tackling and resolving Anti-Social Behaviour (ASB) in our homes and communities. The strategy supports objective five of our Council Housing Strategy 'Ensuring the safety of our homes and residents' and is supplemented by a new ASB Policy which will guide our day-to-day delivery of the service.

ASB can be highly damaging to individuals, families and communities, and no one organisation can end ASB alone. Exeter City Council understands that for us to be able to reduce and eliminate ASB in the City, we need to work in partnership with our partner organisations such as the police, other housing organisations, commissioned services and our communities to prevent, reduce and enforce against ASB. This strategy looks at the following key areas to achieve this:

- Prevention
- Early intervention
- Victim support
- Governance, insight and analytics
- Staff, residents and partners

Definition

The Anti-Social Behaviour, Crime and Policing Act of 2014 defines ASB as:

- 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, or
- Conduct capable of causing housing-related nuisance or annoyance to any person

The national and legal picture

This strategy complies with, and is guided by, the Anti-Social Behaviour, Crime and Policing Act of 2014. The act was introduced with the specific intention of putting victims of ASB at the heart of responses to ASB. The act stresses the importance of early access to information on how to apply for a case review and emphasises the importance of victim representation and independent perspectives as part of the review process.

An important development in the act was the introduction of the Community Remedy, where victims are given a say in out of court punishments. The act goes further to detail the tools and powers which are available to local agencies to respond to ASB, and the legal tests that must be met before each of the powers are used. The legal tests ensure that each response is proportionate.

In 2022, the Government published five ASB principles ¹, which further clarify and strengthen the guidance around the ASB, Crime and Policing Act. The five principles are:

- I. Victims should be encouraged to report Anti-Social Behaviour and expect to be taken seriously. They should have clear ways to report, have access to help and support to recover, and be given the opportunity to choose restorative approaches to tackling ASB
- II. Agencies will have clear and transparent processes to ensure that victims can report ASB concerns, can understand how the matter will be investigated and are kept well informed of progress once a report is made
- III. Agencies and practitioners will work across boundaries to identify, assess and tackle ASB and its underlying causes. Referral pathways should be clearly set out between services and published locally. This includes pathways for the ASB case review and health services
- IV. The public's ASB concerns should always be considered both nationally and locally in strategic needs assessments for community safety. Best practice should be shared through a network of ASB experts within each community safety partnership, each policing area and nationally
- V. Adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it. Agencies should deliver appropriate interventions, which may include criminal justice options, based on the seriousness, risks and vulnerabilities of the case.

In March 2023, the Government announced a new ASB Action Plan ², which brought in an immediate justice scheme, where perpetrators will be made to repair the damage that they have done as soon as 48 hours after their offence. The Action Plan brought in new powers for the police as well as a new reporting tool. Some of the key measures included:

- Increasing the punishment for those who graffiti, litter or fly tip with fines of up to £500 and £1000
- Giving landlords and housing associations more powers to evict unruly tenants due to persistent noise or being drunk and disorderly
- Tackling 'cuckooing' ³ or home invasion by engaging with stakeholders on the scope of a potential new offence
- An ASB taskforce with a sole focus of addressing ASB and restoring pride in place in communities
- An extra one million hours of youth services in areas with the highest rates of ASB to put people on the right track and prevent them from offending in the first place

1. <https://www.gov.uk/government/publications/anti-social-behaviour-principles/anti-social-behaviour-principles>
2. <https://www.gov.uk/government/publications/anti-social-behaviour-action-plan>
3. A tactic where a drug dealer (or network) takes over a vulnerable person's home to prepare, store or deal drugs. It is commonly associated with exploitation and violence.

Local context

	No of ASB cases per thousand properties Exeter City Council	No of ASB cases per thousand properties UK Average (source: Housemark)
2023/24	21.75	27.66
2022/23	35.68	38.25
2021/22	77.80	62.28

It should be noted that although the number of cases of ASB has declined over the past three years, the issues raised are becoming more complex and taking longer to resolve.

Housing Officers are the first point of contact for anybody reporting ASB and are responsible for investigating the complaint and maintaining regular contact with the complainant.

We work, and attend multi-agency meetings, with our partners to ensure that ASB is viewed holistically, and that each agency can bring their own specialisms to tackling it.

The Regulatory environment

The Regulator of Social Housing has launched a new regulatory framework the 'Consumer Standards'⁴ which was implemented on 1st April 2024. The key elements relating to ASB are contained within the Neighbourhood and Community Standard, primarily covered in the 'Safety of shared spaces' sub-section of the standard. However, there are elements of the other Consumer Standards which are relevant, such as complaints. Landlords are now expected to publish performance in relation to ASB as part of the new Tenant Satisfaction Measures (TSMs), in particular against NM01 – Anti-Social Behaviour cases relative to the size of the landlord.

The Local Co-operation section has the required and specific expectations set out which landlords (such as Exeter City Council) must comply with:

Required outcome: This means registered providers must co-operate with relevant partners to promote social, environmental and economic wellbeing in the areas where they provide social housing.

Specific expectations:

SE1: Registered providers must have a policy on how they work with relevant organisations to deter and tackle ASB in the neighbourhoods where they provide social housing.

SE2: Registered providers must clearly set out their approach for how they tackle and deter hate incidents in neighbourhoods where they provide social housing.

4. <https://www.gov.uk/government/consultations/consultation-on-the-consumer-standards/annex-3-consumer-standards>

SE3: Registered providers must enable ASB to be reported easily and keep tenants informed about the progress of their case.

SE4: Registered providers must provide prompt and appropriate action in response to ASB, having regard to the full range of tools and legal powers available to them.

SE5: Registered providers must support tenants who are affected by ASB, including by signposting them to agencies who can give them appropriate support and assistance.

Further information

To inform our position in relation to ASB, we commissioned Housemark, an independent consultancy to carry out an assessment of our ASB service in 2022/23. The results of this assessment have been used to inform this strategy, with the recommendations being captured as part of our action plan.

Objective 1: Prevention of ASB

The prevention of ASB is a key strategic priority for Exeter City Council. However, it is not for one organisation or group to achieve solely, and prevention will only be achieved by working closely with our residents, staff and partner agencies.

By taking a proactive approach to our community investment activities, we can begin to build in preventative measures through an inclusive, inspiring and supportive environment on our estates and throughout the wider city. We need to make sure that we are visible and driving community engagement to prevent ASB from occurring in the first place, building strong, safe and sustainable communities in the process.

We will deliver this by:

- Developing a strategic approach to community cohesion and projects on our estates and within the wider City
- Delivering improved youth provision in partnership with other organisations, including open spaces and activities
- Increasing awareness of what ASB is
- Increasing awareness and understanding of what services are available to residents, and promoting these widely as a deterrent, whilst ensuring perpetrators understand the potential consequences of their behaviour
- Reinforcing and rewarding positive behaviour

- Strengthening our existing messaging on ASB that makes it clear it is a breach of tenancy and what the consequences might be
- Reviewing the robustness and effectiveness of partnership working arrangements, ensuring that there is an understanding of the impact and outcomes from partnership working, and where possible, entering into service level agreements
- Considering how diversionary activities could be used as a method of dealing with ASB. This is likely to involve developing new partnership arrangements and ensuring that the appropriate funding is available
- For new build estates and blocks the design of communal spaces in particular, will be considered to reduce the opportunity for ASB to take place.

Objective 2: Early intervention of ASB

Where our preventative approach does not work, we must ensure that we act at the earliest possible opportunity. In many cases, this can ensure that there are successful resolutions before the ASB has the chance to escalate, reducing the need to involve other agencies.

For us to deliver early interventions, it is fundamental that all parties feel empowered and supported to address the issues in an amicable and resolution focused way. It is also essential that where early intervention approaches fail, that all parties understand the implications of escalation, and that we stay true to our victim centred approach.

We will deliver this by:

- Designing and developing a fast response, customer focused early intervention process. This will be driven by speed and resolution as the two key elements
- Remove bureaucracy from the process to drive resolution and speed
- Ensure that the approach to early intervention is collaborative, and facilitated by Exeter City Council in a mediation role
- The development of easy-to-follow referral pathways across agencies to enable residents to access support as quickly and easily as possible. We will also look at the feasibility of introducing a specific email address and telephone number to report ASB
- Ensuring our multi-agency approach is highly developed and bought into to support early intervention, bringing essential services such as mental health support and the police into the process
- Ensuring that all data and intelligence is shared between agencies to identify patterns of behaviour and repeat offenders. This will help us to identify root causes and deliver a holistic response to support full resolution of not only the reported issue, but the underlying causes.

Objective 3: A victim centred approach to ASB

It is important for us to be aware that victims of ASB will have a range of needs when they report to us. This will be partly due to the ASB itself, but we are seeing an ever-increasing trend where they will have other needs also. Mental health, substance misuse, financial concerns and other health issues can increase the impact of the ASB on an individual, household, or community.

To ensure that our approach is fully focused on the victims of ASB, we need to ensure that we offer a fully holistic, joined up offer which is led by the victims immediate and longer-term needs.

We will deliver this by:

- Offering more support to victims while their cases are being investigated, ensuring that they are being listened to and regular updates are being provided on their case
- Building knowledge and understanding of the process, including what actions can and will be taken by Exeter City Council and other agencies
- Giving victims of ASB the opportunity to give feedback on the service they are receiving and how their case is being handled to drive service improvement and a better experience
- Ensuring that victims are given access to advocacy services and are given the option to choose restorative justice measures if they decide to do so
- Considering how service improvement plans can identify the cost associated with delivering specific ASB service improvements, linking to budget setting and ensuring that our service continues to focus on victims of ASB
- Reviewing the length of time that the acceptable behaviour contract is set to cover in line with good practice
- Providing regular contact for victims
- Undertaking transactional surveys following the closure of ASB cases

Objective 4: Enhancing our governance, insight and analytics for ASB

For us to deliver on our objectives within this strategy, it is essential that we enhance our own internal infrastructure. This objective focuses on our policies, procedures, data, insight and reporting which will improve our knowledge and understanding as well as driving a culture of customer focused service improvement.

This strategy will be the governing document for the ASB service in Exeter and will be supported by a new ASB Policy. This will help to deliver clarity and consistency through our service to our residents.

The Housemark review that was carried out delivered key recommendations around the volume and quality of information that we hold and use to inform our approach. We will develop a new performance reporting framework, as well as a multi-agency information sharing agreement which will support our preventative and early intervention objectives. There is also the new regulatory requirement to report on our ASB performance as part of the Tenant Satisfaction Measures from 2023 onwards, we have complied with this requirement.

We will deliver this by:

- Developing robust performance monitoring, management and reporting, including a review of the indicators and data needed to provide actionable insight and evidence-based decision making to deliver and improve the service
- Developing a more straightforward method of categorising ASB cases (high-level, medium-level, low-level) and provide examples of what types of ASB will fall within each and response times
- Utilising demographic data coupled with ASB data to understand if, where and how services need to be tailored
- Utilising Housemark benchmarking data that is already available to understand how Exeter City Council's ASB service compares to peer groups, and how our staffing and overhead costs perform against others
- Carrying out a full review on how we monitor and report on value for money in relation to ASB, including developing new indicators and coding of expenditure to ensure that the service is economical, efficient and effective. We will also develop a communications plan around the value for money of the service, and develop a specific ASB budget line to facilitate accurate tracking of costs
- Enhance data collection and use of data to evidence where a local lettings plan might be a useful tool in preventing or reducing ASB
- Develop a highly effective approach to building in the resident voice, including follow up phone calls after satisfaction surveys have been completed to ensure that our resident feedback is driving service improvement, using the newly formed Complaints & Performance Group and Council Housing & Development Advisory Board (CHADAB).

Objective 5: Developing our staff, residents and partnerships to tackle ASB

The success of our approach to ASB, and therefore this strategy, is dependent upon our staff and the strength of our multi-agency partnerships. As we have referenced earlier in the strategy, no one organisation can tackle and eradicate ASB in any area, and it is fundamental that there is clarity and consistency in our approach.

We need to ensure that our staff are fully trained, have clear direction and are empowered to tackle ASB in Exeter. Our partnerships need to have clearly defined roles, responsibilities and processes, and the importance of efficient information sharing protocols cannot be underestimated.

We will deliver this by:

- Developing a comprehensive process and procedure which will help to deliver clarity for all parties involved. As part of this work, we will draw up ASB service standards, which will set expectations on the process and timescales for residents and partners
- Reviewing all associated documentation (letters, action plans, tenants' handbook etc) to ensure that there is a clear and consistent message delivered, with a real focus on prevention and resolution
- Identifying the core skills and knowledge required to deliver an effective ASB service, and sourcing training that delivers this. As part of this exercise, it will be essential that training on safeguarding is recognised and included as core knowledge.
- Developing a comprehensive training offer for staff, residents and partners which will embed the Exeter City Council's ASB Policy and Procedure. This training will be delivered as a refresher session on a yearly/bi-yearly basis to ensure that best practice is kept current. We will also provide this training to our involved resident groups to enable them to provide a robust scrutiny and challenge function
- Reviewing our communication channels, including information held on our website. This will be carried out in partnership with our residents to ensure that staff and residents are comfortable with how to access information and use the functionality provided. As part of this review, we will also look at improving our use of social media and our resident newsletters to share examples of successful ASB interventions and to raise awareness of our approach
- In addition to this, we will review the accessibility of the service through interpretation services available, ensuring that there are no barriers to participation
- Ensuring that there are a range of ways in which residents can be involved and influence services, with the Resident Involvement Strategy providing the vehicle to do this via the Tenants' Voice Group. We will look to utilise the Tenants' Voice Group to define the satisfaction measures that residents are interested in and publicise this data

- Reviewing, developing and publishing a list of support services with who Exeter City Council will work, communicating this to staff and residents so they are all aware of the services available and how to access them
- Providing information, support and guidance on how Exeter City Council will support individuals who will have to attend court
- Ensuring that staff and residents know what Exeter City Councils values are and how they drive staff behaviour and service delivery
- Reviewing the team structure to reflect best practice, considering a specialist ASB team rather than the service being delivered as part of a generic housing management function
- Considering the effectiveness of a potential 'community post' which could be jointly funded across the partner agencies.