

Pathways

Anti-Social Behaviour and Hate Incidents Policy



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Scope

This policy sets out how Citra Pathways Limited (Pathways) will aim to deter and tackle Anti-Social Behaviour (ASB) and hate incidents or crime (referred to in this policy as hate crime) in the neighbourhoods where we own and/or manage homes.

We refer to ASB and hate crime separately in this policy. This is because all hate crimes are anti-social, but not all anti-social behaviour is a hate crime. Hate crimes are treated more seriously under UK law and often involve police investigation and prosecution.

We promote tolerance within communities and generally do not treat everyday activities - such as cooking smells, children playing, or occasional parties - as ASB. However, we may investigate if such issues become frequent, disruptive, or have a significant impact.

This policy applies to:

- Pathways customers including their family, other household members, visitors or pets
- Pathways and Lloyds Living staff (colleagues)
- Pathways Board members
- Anyone delivering a service to Pathways including any other Lloyds Banking Group entity or other third party.

Definitions

Anti-Social Behaviour (ASB):

Pathways has adopted the legal definition of ASB as being:

- 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.

Hate crime:

We define hate crime as behaviour committed against a person or property which is motivated by hostility towards someone based on their race, colour, ethnic or national origin, gender identity, sexual orientation, marital status, disability, age or religion. This is in the context that when hate incidents become criminal offences that they are known as hate crimes.

Policy statement

Pathways will work collaboratively with other agencies to deter and address ASB or hate crime in the areas where we own or manage homes. This policy outlines how we do this.

We recognise that unchallenged ASB or hate crime can significantly harm the quality of life for individuals living in affected communities. Therefore, we are committed to taking proactive steps to prevent such behaviour and respond effectively when it occurs.

We take hate crime in any form against any member of our community extremely seriously. Such conduct can have a very traumatic effect on the victim and a divisive effect on our communities. Racial and other harassment and hate crime may include, but is not limited to, violence, intimidation and/or abuse towards a person or group of people (or damage to their property) because of their race, colour, ethnic or national origin, gender identity, sexual orientation, marital status, disability, age or religion.

Pathways customers are expected not to engage in, or permit family members, household occupants, visitors, or pets to engage in, ASB or hate crime.

This applies to behaviour directed at anyone reasonably entitled to be near our properties, including other customers, colleagues, and contractors.

Our approach promotes partnership working between colleagues, customers, communities, and key agencies to foster safe, high-quality neighbourhoods where people can live comfortably.

Pathways will take responsibility for deterring and tackling ASB and hate crime in the neighbourhoods and shared areas where we operate, ensuring accountability for the actions we take.

Policy aims and objectives

We aim to deliver positive outcomes from our work to deter and tackle ASB or hate crime, including ensuring that living environments are safe and comfortable for customers living in Pathways homes.

In adopting and implementing this policy we have the following objectives:

- Minimise the occurrence of ASB or hate crime
- Customers feel supported by colleagues when they experience ASB or hate crime
- Appropriate action against perpetrators of ASB or hate crime is taken and recorded
- Customers are satisfied with our response to dealing with ASB or hate crime
- Adherence to all relevant legislation and regulatory standards.

To ensure these aims are met, we will:

- Be clear with our customers about our approaches to ASB, hate crime or neighbourhood issues
- Whenever possible, agree actions with complainants and victims
- Promote tolerance for everyday activities that are not treated as ASB
- Recognise that effective partnership working is fundamental to addressing ASB and hate crime
- Provide direct support for perpetrators of ASB and hate crime where appropriate, only resorting to enforcement where necessary
- Consider formal legal action, including possession, only as a last resort in the most serious cases or when other measures have failed
- Ensure colleagues are aware of this policy and trained to deal effectively with ASB and hate crime
- Use data and feedback to monitor performance, trends, and the effects of our work, and to identify opportunities to improve our approaches.

We aim to work with partners such as local police or Environmental Health Services when appropriate to address hate crime or ASB incidents.

Our commitments include:

- Eliminating unlawful discrimination and harassment
- Promoting positive relations across diverse communities
- Encouraging the reporting of hate-motivated incidents
- Supporting victims and their families
- Taking action against offenders
- Monitoring hate crime and ASB incidents by type and location
- Tracking responses and satisfaction levels throughout and after cases
- Regularly reporting key data to the Board to ensure accountability and progress toward our goals.

What you can expect if you experience ASB or hate crime

Communication

We will be clear about Pathways, customer and partner responsibilities so that customers understand the different approaches we can take in relation to ASB, hate crime or other neighbourhood issues.

Our parameters for opening and closing cases will be clearly stated.

We will maintain regular and ongoing communication with customers who report ASB, hate crime or other neighbourhood issues and have a case opened; including provision of a named contact and agreed contact schedule. This ensures that Pathways and the customer both have the most up to date information.

Where we do not consider a matter to be ASB or hate incident or are not able to take a case forward we will give a clear explanation of our decisions and signpost to external agencies where appropriate.

We will engage with customers to understand their views and expectations around ASB and hate crime, and to shape how we manage reports of ASB and hate incident and cases opened.

Intervention

Pathways will take prompt, appropriate and decisive action to deal with ASB or hate crime before it escalates. We will investigate cases to understand the issue and gather evidence where appropriate.

Our actions will focus on resolving the problem quickly and effectively, and as such we will seek to avoid use of formal action/use of powers. However sometimes cases will not be effectively resolved this way or may escalate. In such case we'll work with you to agree which formal actions may help with resolution.

We will act in line with key legislation related to ASB or hate crime, and when intervening, we will have regard to the full range of tools and legal powers available. Examples of non-legal and legal approaches are mediation, civil injunctions, community protection notice, and possession orders.

Evicting a Pathways customer following enforcement action relating to ASB or hate crime will be a last resort. If we use mandatory grounds to seek possession where the legal tests are met, the customer will have the right to request a review of our decision to seek possession.

We will take account of underlying causes and vulnerabilities when dealing with customers accused of perpetrating ASB or hate crime, to promote the best chances of resolution and to ensure that our actions are proportionate in line with the Equality Act.

Reporting

Pathways will ensure that all customers can easily report ASB or hate crime and will provide facilities so that ASB or hate crime can be reported and managed online at any time of day.

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Pathways will ensure that all customers can easily report ASB or hate crime and will provide facilities so that ASB or hate crime can be reported and managed online at any time of day.

ASB or hate crime can also be reported by email, phone, or letter or any other method stated in our customer service policy.

- By email hellopathways@lloydsliving.co.uk
- By phone 0345 030 6546
- In writing to Customer Service Pathways, c/o Lloyds Living, X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB
- Online via our [website](#).

In an emergency

If you feel that you or someone else is in imminent danger, you should always contact the Police (999). If you are unable to speak, the Silent Solution system is a crucial service that allows you to signal for help. You should dial 999 and if you cannot speak, press 55 when prompted by the Operator. [Click here](#) for more information. For non-emergencies call 101.

Contact details for all methods of reporting ASB or hate crime will be provided to all customers when the shared ownership lease is granted/assigned.

We want people to feel confident in coming forward with information. Where complainants wish to remain anonymous, we will investigate the complaint, but our ability to take effective action may be limited.

Partnership working

We will maintain good working relationships with support services that can provide support to complainants and perpetrators; and will seek to work in a coordinated manner to support positive outcomes for customers and neighbourhoods.

We will work in partnership with other agencies around intervention, in particular around use of legal powers where agencies other than Pathways must take the lead.

Pathways will participate fully and constructively if requested by relevant bodies to attend an ASB or hate crime case review, with a view to contributing to resolution of persistent ASB or hate crime issues.

Support to victims, witnesses and perpetrators

Where Pathways is responsible for dealing with an ASB or hate crime issue, we will make sure that customers are kept informed about the status of their case where

responsibility rests with the organisation.

If the matter sits outside Pathways responsibility, we will signpost customers to other avenues to assist with the issue.

We will offer support to customers experiencing ASB or hate crime to assist their wellbeing. We will also offer support to those perpetrating ASB or hate crime to try to resolve the behaviour and ensure compliance with the terms of their Shared Ownership lease.

Support to complainants may include:

- Regular contact, explanation of the scope of our interventions, clear action planning and accountability for its completion
- Referral to specialist agencies that can provide support and assistance.

Support to perpetrators may include:

- Ongoing support and clear explanations of expectations and processes underway
- Referral to specialist support e.g. substance misuse, parenting, mental health, finances
- Referral to statutory agencies e.g. social services.

We will liaise with external agencies over progress of the case to support joined up approaches, especially where decisions and steps taken will impact on their client and the nature of support required.

Confidentiality, data protection and information exchange

Whilst we respect privacy and confidentiality and are mindful of our legal obligations under the Data Protection and GDPR legislation, tackling ASB or hate crime requires robust information exchange between statutory and non-statutory agencies. We will agree specific protocols for information sharing with local authorities or the Police.

We will share information with other agencies where lawful to help us detect and prevent ASB or hate crime and to protect our communities. The type of information which might be shared includes, but is not limited to:

- The nature and location of incidents of ASB or hate crime
- Personal information as to complainants and witnesses
- Details of relevant visits to the property by agencies including the police
- Convictions, cautions, reprimands, bail conditions, progress of criminal cases.

Complainants may request confidentiality for various

reasons, such as fear of retaliation. The policy is to seek their permission before disclosing their identity to others, including the alleged perpetrator or legal representatives. If anonymous evidence could reveal someone's identity, this will be discussed with them. However, in some cases, information may need to be shared with other agencies for lawful purposes, such as crime prevention, even if anonymity was requested.

Related legislation and regulation

This policy aims to meet the requirements of the Regulator of Social Housing regulatory standards, in particular the Neighbourhood and Community Standard.

This policy is informed by relevant legislation (not exhaustive) including the Housing Act 1988, Crime and Disorder Act 1998, ASB Crime and Policing Act 2014, GDPR and Data Protection legislation, Human Rights Act 1998 and Equality Act 2010.

Related policies

Separate policies set out our approaches to:

- Domestic abuse
- Allocation of property (Allocations policy)
- Complaints policy.

Responsibilities

Pathways and customers responsibilities relating to ASB and hate crime are set out at Appendix 1.

We will confirm these with new customers at the commencement/assignment of the shared ownership lease and publish them on our website as part of this policy. Where a customer reports ASB, hate crime or other related neighbourhood concerns with us, we will confirm rights and responsibilities with them.

Service standards

We will take prompt action to address customer concerns relating to ASB or hate crime in accordance with our service standards.

ASB or hate crime actions will be categorised and delivered within stated timescales are set out at Appendix 2.

We will keep accurate records on all reports of ASB and cases opened.

Customer feedback and complaints

Customer complaints about ASB services will be handled in line with our complaints policy.

Complaints relating to ASB will be monitored and used, individually and in aggregate, to refine and improve our services and performance.

Monitoring and compliance

We will monitor the delivery of our service and report to operational staff, senior leadership team, the Pathways Board, and our customers. Key performance indicators will be used to monitor and report performance, as well as complaints & compliments received. This allows us to be accountable for our service delivery, identify any trends which require intervention, and focus on delivery of the objectives stated above.

We will report against the Tenant Satisfaction Measures prescribed by the Regulator of Social Housing, as well as indicators developed for internal use by staff in conjunction with customers.

Performance indicators that will be reported to the Pathways Board and customers on our website.

Policy control and review schedule

This policy will be reviewed every three years or more frequently as a result of an incident occurring, feedback obtained, internal/external audits and change in legislation/regulatory requirements. This process ensures the policy's continuing suitability, adequacy, and effectiveness.

The Pathways Chief Strategy Officer has responsibility for this policy, and ultimate responsibility for performance and compliance sits with the Pathways Board.

Current version	Date approved	Date for review	Document owner
1.1	16.12.2025	By 16.12.2028	Craig Luttman

This policy relates to Pathways only.

Citra Pathways Limited is a Private Limited Company. Registered in England and Wales No. 15662072.

It is a for-profit registered provider of social housing and registered with the Regulator of Social Housing (No. 5221).

Citra Pathways Limited registered office: X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB.

Citra Pathways Limited is a part of Lloyds Banking Group. It is a wholly owned subsidiary of Citra Living Limited.

Lloyds and Lloyds Living are trading names of Citra Living Limited. Registered office: X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB. Registered in England and Wales No. 13120129. Citra Living Limited is part of Lloyds Banking Group but is not regulated by the Financial Conduct Authority or the Prudential Regulation Authority.



Appendices

Appendix 1 – Pathways and customer responsibilities

Pathways' ASB and hate crime responsibilities are to:

- Show strong leadership, commitment and accountability on preventing and tackling ASB and hate crime that reflects a shared understanding of responsibilities with other local agencies
- Ensure that customers are made aware of their responsibilities and rights in relation to ASB and hate crime
- Place a strong focus on preventative measures tailored towards the needs of customers and their families
- Take prompt, appropriate and decisive action to deal with ASB and hate crime before it escalates
- Work in partnership with other agencies to prevent and tackle ASB and hate crime in the neighbourhoods where we own homes
- Ensure all customers can easily report ASB and hate crime
- Focus on resolving ASB and hate crime having regard to the full range of tools and legal powers available
- Ensure customers are kept informed about the status of their case where responsibility rests with the Pathways and are appropriately signposted where it does not
- Provide appropriate support to victims and witnesses
- Publish this policy on how we work with relevant partners to prevent and tackle ASB and hate crime in neighbourhoods where we own or manage homes
- Participate constructively in an ASB or hate crime case review when a person asks the relevant local bodies for one and the local threshold is met.

Customers are responsible for:

- Ensuring their behaviour does not cause, and is not likely to cause, nuisance, annoyance, harassment, alarm or distress to others
- Ensuring the behaviour of their household members, family, friends, pets and visitors does not cause, and is not likely to cause, nuisance, annoyance, harassment, alarm or distress to others
- Showing tolerance of other customers' day to day living and lifestyle differences where these occur
- Addressing minor disagreements and problems themselves, showing respect to others
- Reporting incidents of ASB and hate crime promptly
- Complying with the relevant terms of their lease relating to nuisance.

Appendices

Appendix 2 – Service Standards

We will take prompt action to address customer concerns relating to ASB in accordance with our service standards. ASB actions will be categorised and delivered within stated timescales as follows:

Category	Definition	Timescale
Category 1	Serious issues of ASB including all hate crime, where there is a serious risk or evidence of harm to individuals including: • Abusive or threatening behaviour • Assault • Domestic abuse • Drug activity involving enforcement action e.g. a closure order • Cuckooing (taking over someone's home to facilitate crime or exploitation).	– Case opened within 1 working day of report – Action plan in place within 1 week of case opening – Fortnightly contact established with customer within 28 days or as agreed in the action plan.
Category 2	Other issues of ASB that cause irritation, upset, and impede enjoyment of property and neighbourhood stability including: • Noise nuisance • Neighbour disputes • Alcohol related disturbance • Animal nuisance • Criminal damage • Drug use/dealing.	– Case opened within 3 working days of report – Action plan in place within 2 weeks of case opening – Fortnightly contact established with customer within 28 days or as agreed in the action plan.

We will keep accurate records on all reports of ASB and cases opened.

For more information, please visit:

www.lloydsliving.co.uk/pathways

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