

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	<b>Anti-Social Behaviour Policy</b>
<b>Date of assessment</b>	January 2025
<b>Directorate and Service</b>	Housing & Public Protection, Housing Services
<b>Manager</b>	Tenancy Services Manager / Housing Development & Policy Manager / Community Safety Manager / Head of Environmental Health & Regulatory Services
<b>Officer conducting assessment</b>	Senior Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Anti-Social Behaviour Policy is an existing policy that outlines Dartford Borough Council's overall approach towards tackling anti-social behaviour in the Borough, incorporating the roles of the three main service areas that deal with anti-social behaviour (Community Safety Unit, Housing Service and Environmental Health). This assessment has been undertaken in conjunction with a review of the policy, which proposed the policy is renamed to 'Anti-Social Behaviour and Hate Incident Policy'.</p> <p>The overall objective of the policy is to prevent and minimise instances of anti-social behaviour and to resolve it as early as possible through timely, appropriate and proportionate intervention. To achieve this, the Council aims to:</p> <ul style="list-style-type: none"> <li>• Provide an accessible, effective service, which encourages residents to report incidents and communicates effectively with all parties;</li> <li>• Develop community safety strategies to prevent anti-social behaviour and take firm action against perpetrators;</li> <li>• Understand the risk and the impact of harm to victims, enabling the appropriate and necessary action to be taken;</li> <li>• Protect and support victims and witnesses, complying with procedures on confidentiality at all times;</li> <li>• Ensure support is available to vulnerable victims as well as to vulnerable perpetrators to tackle the root causes of the anti-social behaviour;</li> <li>• Treat people fairly and equally, ensuring that any action taken is proportionate and reasonable in the circumstances;</li> <li>• Tackle inequality and discrimination;</li> <li>• Work in partnership with tenants, residents and others agencies to provide an effective response.</li> </ul>

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<b>Step 1: Scoping the assessment</b>	
	<p>The Anti-Social Behaviour Policy supports the Equality Act 2010 aims to:</p> <ul style="list-style-type: none"> <li>• Eliminate unlawful discrimination, harassment and victimisation, particularly where the anti-social behaviour is personal and targets a specific individual or group.</li> <li>• Promote equality of opportunity by aiming to provide an accessible service that all residents can approach for assistance and receive help to resolve anti-social behaviour.</li> <li>• Foster good relations between persons who share a relevant protected characteristic and persons who do not. This means tackling prejudice and promoting understanding between people.</li> </ul>
<p><b>2. Who will be affected by the activity or proposal?</b></p>	<p>The policy will affect all residents within the Dartford Borough.</p>
<p><b>3. How does the activity or proposal contribute to:</b>  <b>a) any key performance indicators?</b>  <b>b) policies, values or objectives of Dartford Borough Council?</b></p>	<p>a) The Anti-Social Behaviour Policy contributes to the following Corporate Plan 2024-2027 performance indicators:</p> <ul style="list-style-type: none"> <li>• Number of reported anti-social behaviour incidents in the Borough by the Police.</li> <li>• Number of Community Protection Warnings issued.</li> <li>• Number of Community Protection Notices issued.</li> </ul> <p>The policy also contributes to the following Tenant Satisfaction Measures collected by the Housing Service:</p> <ul style="list-style-type: none"> <li>• Satisfaction with the approach to handling anti-social behaviour.</li> <li>• Number of anti-social behaviour cases opened per 1,000 homes.</li> <li>• Number of anti-social behaviour cases that involve hate incidents opened per 1,000 homes.</li> </ul> <p>b) The Anti-Social Behaviour Policy contributes to the following Corporate Plan safety and housing objectives to:</p> <ul style="list-style-type: none"> <li>• Utilise the tools and powers available to the Council to tackle anti-social behaviour.</li> <li>• Provide a high quality and responsive housing service that’s built on respect for aspiring and existing tenants. We want to be practical, honest and straightforward in all the information and advice we give.</li> <li>• Strive for full compliance with the Regulator of Social Housing’s consumer standards in delivering good quality homes and services to the tenants that live in our homes.</li> </ul>
<p><b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and</b></p>	<p>The Anti-Social Behaviour Policy and its delivery is intended to be compatible with the Council’s obligations consequent to all relevant legislation, protocols, statutory guidance, regulation and protocols including, but not limited to:</p>

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<p><b>where do we have discretion in how they are delivered?</b></p>	<ul style="list-style-type: none"> <li>• Crime and Disorder Act 1998</li> <li>• Anti-Social Behaviour, Crime and Policing Act 2014 and the Anti-social Behaviour, Crime and Policing Act 2014: Anti-social behaviour statutory guidance for frontline professionals</li> <li>• Anti-Social Behaviour Act 2003</li> <li>• Housing Acts 1985, 1996 and 2004</li> <li>• Environmental Protection Act 1990</li> <li>• Localism Act 2011</li> <li>• Control of Pollution Act 1974</li> <li>• Refuse Disposal (Amenity) Act 1978</li> <li>• Criminal Procedure and Investigations Act 1996</li> <li>• Criminal Justice Act 2003</li> <li>• Town and Country Planning Act 1990</li> <li>• Regulation of Investigatory Powers Act 2000</li> <li>• Dangerous Dogs Act 1991</li> <li>• Clean Neighbourhoods and Environment Act 2005</li> <li>• Protection of Freedoms Act 2012</li> <li>• Care Act 2014</li> <li>• Children Act 1989</li> <li>• Children Act 2004</li> <li>• Mental Capacity Act 2005</li> <li>• Human Rights Act 1998</li> <li>• Protection from Harassment Act 1997</li> <li>• Data Protection Act 2018</li> <li>• UK GDPR</li> <li>• Race Relations (Amendment Act) 2000</li> <li>• Racial and Religious Hatred Act 2006</li> <li>• Equality Act 2010</li> <li>• Homelessness Reduction Act 2017</li> <li>• Domestic Abuse Act 2021</li> <li>• Neighbourhood and Community Standard 2024</li> <li>• Statutory Code of Practice on Racial Equality in Housing</li> <li>• Pre-Action Protocol for Possession Claims by Social Landlords</li> </ul>

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<b>Step 1: Scoping the assessment</b>	<p>In particular, the Crime and Disorder Act 1998 requires the Council to work together with the Police and other agencies to develop and implement strategies to reduce crime, disorder and anti-social behaviour. The Council has a range of additional powers to take action against those causing anti-social behaviour under the Anti-Social Behaviour, Crime and Policing Act 2014.</p> <p>In addition, the Council has a duty under the Housing Act 1996 (as amended) and the Regulator of Social Housing’s Neighbourhood and Community Standard 2024 to have a policy on how it works with relevant organisations to deter and tackle anti-social behaviour in the neighbourhoods where it provides social housing. There is also a requirement to clearly set out the approach for how hate incidents are deterred and tackled.</p> <p>Furthermore, the Council has a duty under the Environmental Protection Act 1990 to investigate complaints that could be a ‘statutory nuisance’ and to take action where the Council is satisfied there is a statutory nuisance.</p> <p>Discretion is exercised in many of the powers and tools that the Council can choose to use to tackle anti-social behaviour. The Council’s response to reports of anti-social behaviour are based upon what is considered to be proportionate and appropriate. Action taken by the Council will be specific to each situation based on the circumstances. Whilst many of the enforcement powers and tools are discretionary, the procedures for using them are largely prescribed by legislation, statutory guidance and court procedures.</p>
<b>Step 2: Information collection</b>	<p><b>5. What do you know about the groups of people who will be affected?</b> (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p> <p><b><u>POPULATION PROFILE – DARTFORD</u></b></p> <ul style="list-style-type: none"> <li>• <b>Population</b> – Dartford’s population is 120,700.</li> <li>• <b>Sex</b> – There are more female residents than male residents in Dartford with 51.2% females to 48.8% males.</li> <li>• <b>Age</b> – The mean age in Dartford is 37.4 years, which is lower than the overall Kent mean age of 41.7 years.</li> <li>• <b>Ethnicity</b> – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.5%), Asian, Asian British or Asian Welsh (9.9%), Mixed or multiple ethnic groups (3.1%), and Other ethnic groups (2.0%).</li> <li>• <b>Disability</b> – 14.0% of Dartford population are disabled. Of this, 8.3% of people’s activities are limited a lot and 5.7% of people’s activities are limited a little.</li> </ul>

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	<ul style="list-style-type: none"> <li>• <b>Religion or belief</b> – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Sikh, 0.6% Buddhist, 0.1% Jewish, and 0.4% other religion. 36.5% of Dartford’s population did not connect or identify with any religion and 5.3% did not answer this question in the Census.</li> <li>• <b>Sexual orientation</b> – 91.2% of Dartford’s population aged 16 years and over identified as straight or heterosexual. 1.2% described themselves as gay or lesbian. 0.9% described themselves as bisexual, and 0.2% described themselves as other sexual orientations. 6.5% did not answer this question in the Census.</li> <li>• <b>Gender reassignment</b> – 94.3% of Dartford’s population aged 16 years and over identified their gender identity as the same sex as registered at birth. 0.2% of Dartford’s population identified their gender identity as different from the sex they were registered at birth.</li> </ul> <p>(Sources: 2023 Mid-Year Population Estimates and 2021 Census, Office for National Statistics)</p> <p><b><u>HOUSING SERVICE – PROFILE OF TENANTS</u></b></p> <p><b>Tenant profile</b> – The Council owns and manages a housing stock of 4,216 properties. Information in relation to profile of Council tenants (Tenant 1 data) is captured by the Council’s Housing Service, as follows:</p> <table border="1" data-bbox="656 794 2116 1348"> <tbody> <tr> <td rowspan="3"><b>Sex</b></td> <td>Male</td> <td>33.85%</td> </tr> <tr> <td>Female</td> <td>66.03%</td> </tr> <tr> <td>Unknown</td> <td>0.12%</td> </tr> <tr> <td rowspan="4"><b>Age</b></td> <td>18-24</td> <td>1.59%</td> </tr> <tr> <td>25-39</td> <td>20.41%</td> </tr> <tr> <td>40-59</td> <td>38.22%</td> </tr> <tr> <td>60+</td> <td>39.78%</td> </tr> <tr> <td rowspan="6"><b>Race</b></td> <td>White</td> <td>67.72%</td> </tr> <tr> <td>Asian or Asian British</td> <td>1.45%</td> </tr> <tr> <td>Black or Black British</td> <td>1.47%</td> </tr> <tr> <td>Mixed</td> <td>2.00%</td> </tr> <tr> <td>Chinese or other ethnic group</td> <td>0.24%</td> </tr> <tr> <td>Unknown/ prefer not to say</td> <td>27.12%</td> </tr> <tr> <td rowspan="2"><b>Disability/ vulnerability</b></td> <td>No disability/ vulnerability</td> <td>79.16%</td> </tr> <tr> <td>Disability/ vulnerability</td> <td>20.84%</td> </tr> </tbody> </table>		<b>Sex</b>	Male	33.85%	Female	66.03%	Unknown	0.12%	<b>Age</b>	18-24	1.59%	25-39	20.41%	40-59	38.22%	60+	39.78%	<b>Race</b>	White	67.72%	Asian or Asian British	1.45%	Black or Black British	1.47%	Mixed	2.00%	Chinese or other ethnic group	0.24%	Unknown/ prefer not to say	27.12%	<b>Disability/ vulnerability</b>	No disability/ vulnerability	79.16%	Disability/ vulnerability	20.84%
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## Step 2: Information collection

**Leaseholder profile** – There are currently 481 leasehold properties. The conveyancing process is managed by external bodies and legal transfers which do not collect personal data concerning the protected characteristics of new home owners. The Housing Service does not receive or hold any personal data regarding leaseholders other than name and address.

### HOUSING SERVICE – ANTI-SOCIAL BEHAVIOUR CASE LOAD

Year	Number of anti-social behaviour cases
2022-23	443
2023-24	148

Year	Number of anti-social behaviour cases that involve hate incidents
2022-23	1
2023-24	0

### HOUSING SERVICE – TENANT SATISFACTION MEASURES

Year	Number of anti-social behaviour cases opened per 1,000 homes
2023-24	35.1

Year	Number of anti-social behaviour cases that involve hate incidents opened per 1,000 homes
2023-24	0

Year	Satisfaction with the approach to handling anti-social behaviour
2023-24	51.1%

### COMMUNITY SAFETY UNIT – ANTI-SOCIAL BEHAVIOUR CASE LOAD

Year	Number of anti-social behaviour cases
2022-23	110
2023-24	290

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Step 2: Information collection																	
	<p><b><u>ASB REVIEWS (COMMUNITY TRIGGER)</u></b></p> <table border="1"> <thead> <tr> <th>Year</th> <th>No. of Community Trigger applications received by the CSP</th> <th>No. of Community Trigger applications meeting the threshold / case reviews carried out</th> <th>Number of Community Trigger Case reviews that resulted in recommendations being made</th> </tr> </thead> <tbody> <tr> <td>1 April 2021 – 31 March 2022</td> <td>6</td> <td>2</td> <td>1</td> </tr> <tr> <td>1 April 2022 – 31 March 2023</td> <td>3</td> <td>0</td> <td>0</td> </tr> <tr> <td>1 April 2023 – 31 March 2024</td> <td>4</td> <td>1</td> <td>0</td> </tr> </tbody> </table>	Year	No. of Community Trigger applications received by the CSP	No. of Community Trigger applications meeting the threshold / case reviews carried out	Number of Community Trigger Case reviews that resulted in recommendations being made	1 April 2021 – 31 March 2022	6	2	1	1 April 2022 – 31 March 2023	3	0	0	1 April 2023 – 31 March 2024	4	1	0
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<p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p>Consultation will be carried out to inform the review of the Anti-Social Behaviour Policy, as set out below in question 7.</p>																
<p><b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b></p>	<p><b>Internal consultation</b> – Council officers within the Community Safety Unit, Housing Service and the Environmental Health Service will be consulted in the review of the Anti-Social Behaviour Policy.</p> <p><b>Tenant and leaseholder consultation</b> – The Council is committed to ensuring the voice of residents is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord’s housing-related policies and strategies. Consultation with Council tenants and leaseholders will be undertaken, as follows:</p> <ol style="list-style-type: none"> <li>1. All Council tenants and leaseholders will be invited to comment on the proposed updated Anti-Social Behaviour Policy.</li> <li>2. The Dartford Tenants’ and Leaseholders’ Forum (DTLF) will be invited to comment on the proposed updated Anti-Social Behaviour Policy. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents</li> </ol>																

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<b>Step 2: Information collection</b>	
	<p>are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery.</p> <p>3. The Housing Advisory Board (HAB) will be invited to comment on the proposed updated Anti-Social Behaviour Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members.</p> <p><b>Wider public and external agency consultation</b> – Members of the wider public and external agencies will have the opportunity to provide feedback on the draft Anti-Social Behaviour through the dedicated consultation webpage on the Council’s website.</p>

<b>Step 3: Assessing the equality impact</b>	
<p>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</p> <p>a) tackling unlawful discrimination  b) promoting equality of opportunity  c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> <li>• The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration</li> <li>• For existing activities, consider how they are working in practice for each relevant protected group</li> <li>• For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group</li> <li>• If there is no identified equality impact, please tick the ‘No Impact’ box and explain why in question 9</li> <li>• If the equality impact is unclear, please tick the ‘Unknown’ box and explain why in question 9</li> </ul>	

<b>Step 3: Assessing the equality impact</b>				
<b>PROTECTED CHARACTERISTIC</b>	<b>POSITIVE IMPACTS</b>	<b>NEGATIVE IMPACTS</b>	<b>NO IMPACT</b>	<b>UNKNOWN</b>
<b>Age</b>	<b>Children and young people</b> - Section 12 of the policy sets out the approach for when children and young people are affected by anti-social		<input type="checkbox"/>	<input type="checkbox"/>



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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>behaviour. Where the alleged perpetrators of anti-social behaviour are children or young people, the Council will involve parents and guardians to help resolve the problem, and may also liaise with other agencies. This may include Children’s Social Work Services (to ensure any necessary child in need assessments are carried out), Schools, Youth Offending Teams, Early Help Service (for Early Help and/or under the Supporting Families Programme) and any other relevant agencies.</p> <p>Legal action against children and young people will only be taken after consultation with the Youth Offending Team.</p> <p>Where it is believed that any child is at risk of significant harm due to anti-social behaviour, a child protection referral will be made to Children’s Social Work Services to protect the child from harm.</p> <p><b>Older vulnerable adults</b> - Section 13 of the policy sets out the approach for protecting and supporting vulnerable victims and perpetrators of anti-social behaviour.</p> <p>Older adults may feel particularly vulnerable, intimidated and fearful of certain anti-social conduct. A risk assessment is carried out to determine if the victim and/or perpetrator is vulnerable. For Council tenants, a person’s</p>			

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Step 3: Assessing the equality impact				
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	<p>vulnerability is determined at the point of access to their tenancy, where a record is kept on their tenancy file including details of any involved support services. Vulnerability may also be determined during the course of the tenancy as tenants' circumstances can change.</p> <p>Referrals will be made to support services for vulnerable victims of anti-social behaviour.</p> <p>Additional contact, including home visits will be made to vulnerable Council tenants, including tenants in housing schemes, affected by anti-social behaviour to provide reassurance and support.</p> <p>Where it is believed a vulnerable adult has care and support needs and is experiencing or at risk of abuse due to anti-social behaviour or forms of violence or discrimination, a referral will be made to Adult Social Services to protect the adult from harm.</p> <p>The Council will liaise with the vulnerable perpetrators' support networks or connect them to support services if they are not already engaged.</p> <p>It is recognised that following the usual procedure for vulnerable perpetrators of anti-social behaviour through enforcement measures is not always appropriate. The Council will have</p>			

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	<p>regard to the particular circumstances and the vulnerability of perpetrators when considering the most appropriate form of intervention and action. Therefore, before considering enforcement action, additional steps will be taken wherever possible to work with the vulnerable perpetrator to tackle the root causes of the behaviour. Although, there are some circumstances where the Council may have an overriding duty to take action, for example, where a statutory nuisance has been caused.</p> <p>For Council tenants at risk of possession proceedings due to anti-social behaviour, if the Council is aware that the tenant is particularly vulnerable, it will consider at an early stage: whether or not the tenant has the mental capacity to defend possession proceedings and the extent to which CPR 21 applies; whether or not any issues arise under the Equality Act 2010; and whether or not there is a need for a community care assessment in accordance with the Care Act 2014.</p>			
<b>Disability</b>	<p><b>Vulnerable disabled adults</b> - Section 13 of the policy sets out the approach for protecting and supporting vulnerable victims and perpetrators of anti-social behaviour. A risk assessment is carried out to determine if the victim and/or alleged perpetrator is vulnerable due to disability. For Council tenants, a person's vulnerability is determined at the point of access</p>		<input type="checkbox"/>	<input type="checkbox"/>

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	<p>Misuse Services for both victims and perpetrators.</p> <p><b>Hate crime and hate incidents</b> – A person may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice is based on the person’s disability or perceived disability.</p> <p>The Regulator of Social Housing’s Neighbourhood and Community Standard 2024 requires the Council, as a social housing landlord, to set out its approach for deterring and tackling hate incidents in the neighbourhoods where it provides social housing.</p> <p>Section 6 of the policy defines hate crime and hate incidents and explains that reports will be categorised as high priority with contact made with the victim within 48 hours. Section 9 explains the Police will be notified of all cases involving violence and criminality and the Council will assist the Police where necessary.</p> <p><b><i>Action: It is recommended the refresh of policy includes reviewing the information provided on the approach to deter, tackle and support victims of hate-motivated behaviour so that this is clearly communicated in line with regulatory requirements.</i></b></p>			

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	<p><b>Communication needs</b> - The Council recognises that it is important that people with specific communication needs can obtain support for this when accessing services. Section 11 of the policy explains that, in accordance with the Council’s Equality &amp; Diversity Document Framework, information about the services available to resolve anti-social behaviour can be provided in alternative formats to people with sensory needs including, Braille, audio tape and large print versions of documents, and British Sign Language interpreting. Calls can be received via Relay UK.</p>			
<b>Sex</b>	<p><b>Domestic abuse</b> – While domestic abuse can affect anyone regardless of their protected characteristics, domestic abuse is closely related to the protected characteristic of ‘sex’. Proportionally more women are affected by domestic abuse than men.</p> <p>Domestic abuse is included within the remit of the policy under Section 9 where cases will be categorised as high priority and contact made with the victim within 48 hours.</p> <p>In 2024, the Council’s Housing Service developed a Domestic Abuse Housing Strategy, containing a policy statement on its approach towards to identifying, supporting and protecting victims and survivors of domestic abuse. This was developed to comply with the Regulator of</p>		<input type="checkbox"/>	<input type="checkbox"/>

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	<p>Social Housing’s Neighbourhood and Community Standard 2024, which requires the Council, as a social housing landlord, to have a policy in place.</p> <p><b>Action: It is recommended that a link to this strategy is included within the policy to ensure that context is provided on the Housing Service having a dedicated strategy and policy statement on domestic abuse separate to the policy on anti-social behaviour.</b></p>			
<b>Gender reassignment</b>	<p><b>Hate crime and hate incidents</b> – A person may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice is based on the person’s transgender identity or perceived transgender identity.</p> <p>The Regulator of Social Housing’s Neighbourhood and Community Standard 2024 requires the Council, as a social housing landlord, to set out its approach for deterring and tackling hate incidents in the neighbourhoods where it provides social housing.</p> <p>Section 6 of the policy defines hate crime and hate incidents and explains that reports will be categorised as high priority with contact made with the victim within 48 hours. Section 9 explains the Police will be notified of all cases involving violence and criminality and the Council will assist the Police where necessary.</p>		<input type="checkbox"/>	<input type="checkbox"/>



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PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p><b>Action: It is recommended the refresh of policy includes reviewing the information provided on the approach to deter, tackle and support victims of hate-motivated behaviour so that this is clearly communicated in line with regulatory requirements.</b></p>			
<b>Race</b>	<p><b>Hate crime and hate incidents</b> – A person may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice is based on the person’s race or perceived race.</p> <p>The Regulator of Social Housing’s Neighbourhood and Community Standard 2024 requires the Council, as a social housing landlord, to set out its approach for deterring and tackling hate incidents in the neighbourhoods where it provides social housing.</p> <p>Section 6 of the policy defines hate crime and hate incidents and explains that reports will be categorised as high priority with contact made with the victim within 48 hours. Section 9 explains the Police will be notified of all cases involving violence and criminality and the Council will assist the Police where necessary.</p> <p><b>Action: It is recommended the refresh of policy includes reviewing the information provided on the approach to deter, tackle and support victims of hate-motivated behaviour so that this is clearly communicated in line with regulatory requirements.</b></p>		<input type="checkbox"/>	<input type="checkbox"/>

## Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p><b>Communication needs</b> – The Council recognises that it is important that people with specific communication needs can obtain support for this when accessing services. Section 11 of the policy explains that, in accordance with the Council’s Equality &amp; Diversity Document Framework, information about the services available to resolve anti-social behaviour can be provided in alternative formats to people where English is not their first language including, documents translated into other languages and telephone and face-to-face language interpreting.</p>			
<b>Religion/Belief</b>	<p><b>Hate crime and hate incidents</b> – A person may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice is based on the person’s religion or perceived religion.</p> <p>The Regulator of Social Housing’s Neighbourhood and Community Standard 2024 requires the Council, as a social housing landlord, to set out its approach for deterring and tackling hate incidents in the neighbourhoods where it provides social housing.</p> <p>Section 6 of the policy defines hate crime and hate incidents and explains that reports will be categorised as high priority with contact made with the victim within 48 hours. Section 9 explains the Police will be notified of all cases</p>		<input type="checkbox"/>	<input type="checkbox"/>

## Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>involving violence and criminality and the Council will assist the Police where necessary.  <b>Action: It is recommended the refresh of policy includes reviewing the information provided on the approach to deter, tackle and support victims of hate-motivated behaviour so that this is clearly communicated in line with regulatory requirements.</b></p>			
<b>Sexual Orientation</b>	<p><b>Hate crime and hate incidents</b> – A person may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice is based on the person’s sexual orientation or perceived sexual orientation.</p> <p>The Regulator of Social Housing’s Neighbourhood and Community Standard 2024 requires the Council, as a social housing landlord, to set out its approach for deterring and tackling hate incidents in the neighbourhoods where it provides social housing.</p> <p>Section 6 of the policy defines hate crime and hate incidents and explains that reports will be categorised as high priority with contact made with the victim within 48 hours. Section 9 explains the Police will be notified of all cases involving violence and criminality and the Council will assist the Police where necessary.  <b>Action: It is recommended the refresh of policy includes reviewing the information provided on the approach to deter, tackle and</b></p>		<input type="checkbox"/>	<input type="checkbox"/>

## Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<i>support victims of hate-motivated behaviour so that this is clearly communicated in line with regulatory requirements.</i>			
<b>Pregnancy/Maternity</b>	Anti-social behaviour can affect any person regardless of pregnancy and maternity. The activities contained in the policy cover all persons irrespective of protected characteristic group in terms of victims and perpetrators, therefore access to and delivery of the service is not affected by pregnancy and maternity.		<input type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>	This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment. However, anti-social behaviour can affect any person including persons with the protected characteristic of marriage and civil partnership. The activities contained in the policy cover all persons irrespective of protected characteristic group in terms of victims and perpetrators, therefore access to and delivery of the service is not affected by marriage and civil partnership.		<input type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

## Customer Access Review – Full Assessment

<b>Step 3: Assessing the equality impact</b>	
9. If 'no impact' or 'unknown' was selected, please explain	Not applicable.
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	<p>The Council works in partnership with various internal departments, statutory agencies and voluntary third sector agencies to maximise the support available to victims and perpetrators of anti-social behaviour. The Council also facilitates or engages with various multi-agency partnerships to tackle anti-social behaviour (as outlined in Section 5 of the Anti-Social Behaviour Policy), including:</p> <ul style="list-style-type: none"> <li>• Dartford Community Safety Partnership, including daily briefing meetings</li> <li>• Dartford Vulnerability and Contextual Safeguarding Panel</li> <li>• Dartford Town Against Crime</li> <li>• Housing Service Complex Case Panel</li> <li>• Kent Police</li> <li>• District Child Protection Panels</li> <li>• Adult Safeguarding Case Conferences</li> <li>• Multi-agency Risk Assessment Conferences</li> <li>• Multi-agency Public Protection Arrangements</li> <li>• Serious Organised Crime Panel</li> </ul> <p>There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups other than to positively improve work towards deterring and tackling anti-social behaviour and supporting victims. Effective communication with partnerships will ensure the correct support is provided through information sharing.</p>
11. Any other comments	<p><b>Proportionality test</b> - If the Council is considering issuing possession proceedings regarding a Council tenancy, a proportionality test will be carried out to ensure that in cases where human rights, public law or equality law matters are or may be raised, the necessary information is before the court at the first hearing so that issues of proportionality may be dealt with summarily, if appropriate, or that appropriate directions for trial may be given.</p> <p><b>ASB Case Review (Community Trigger)</b> - The ASB Case Review process, more commonly known as the 'Community Trigger', gives victims the right to request a review of their case. The Community Trigger can be used if; at least three incidents of anti-social behaviour have been reported to a relevant organisation, i.e. the Police, the Council or housing provider, within the previous six months and it is felt no action has been taken.</p>

# Customer Access Review – Full Assessment

<b>Step 3: Assessing the equality impact</b>	
	<p><b>Complaints process</b> - Any person who is not satisfied with the service they have received regarding the management of an anti-social behaviour case or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints process.</p> <p><b>Conclusion</b> - Overall the Anti-Social Behaviour Policy is considered to have a positive equality impact as it provides a transparent, proportionate, fair and consistent approach to the approach to deterring and tackling anti-social behaviour that reflects the Council's commitment to equality of access for all residents and takes account of the needs of vulnerable people. This assessment has made recommendations to strengthen the information within the policy regarding the approach taken towards hate crime and hate incidents and by referring to the Domestic Abuse Housing Strategy to provide additional context.</p>

<b>Step 4: Action plan</b>
<p><b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b></p> <p>a) any gaps in information and consultation</p> <p>b) how any negative impacts on equality will be mitigated or eradicated</p>

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from all Council tenants, leaseholders, the wider public and external partner agencies on the draft Anti-Social Behaviour Policy	Invite views on the draft policy from all Council tenants, leaseholders, the wider public and external partner agencies	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	28 February 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer
Views from the Dartford Tenants' and Leaseholders' Forum	Invite views on the draft policy from the Dartford	Feedback will, at a formative stage, inform any further changes that	28 February 2025	Details of the consultation and any amendments made to	Senior Housing Policy & Performance Officer

## Customer Access Review – Full Assessment

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
on the draft Anti-Social Behaviour Policy	Tenants' and Leaseholders' Forum	may be required to the draft policy in advance of seeking approval for the policy		the draft policy as a result of the consultation will be included in the Cabinet report	
Views from the Housing Advisory Board on the draft Anti-Social Behaviour Policy	Invite views on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	28 February 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
The refresh of Anti-Social Behaviour Policy should include reviewing the information provided on the approach to deter, tackle and support victims of hate-motivated behaviour	Rename the policy to Anti-Social Behaviour and Hate Incident Policy, and strengthen the information within the policy around the approach to deterring and tackling hate incidents	The approach to deterring and tackling hate incidents is clearly communicated in the policy.  Potential increased reporting of hate incidents to the Housing Service through raised awareness of the approach taken to deter and tackle it	31 January 2025	Through the policy review process  Anti-social behaviour case load  Tenant Satisfaction Measures	Senior Housing Policy & Performance Officer
There is no reference to the Domestic Abuse Housing Strategy	Include a link to Domestic Abuse Housing Strategy within the Anti-Social Behaviour Policy	Context is provided that the Housing Service has a dedicated strategy and policy statement on	31 January 2025	Through the policy review process	Senior Housing Policy & Performance Officer

# Customer Access Review – Full Assessment

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
within the Anti-Social Behaviour Policy		domestic abuse separate to the policy on anti-social behaviour			

Step 5: Decision making and future monitoring	
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Director of Housing & Public Protection
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	Anti-social behaviour cases are monitored and reported on a regular basis through Corporate Plan KPIs and Tenant Satisfaction Measures. Monitoring is also carried out through analysis of customer satisfaction surveys, learning from complaints and Community Trigger data.
16. When will you review this Customer Access Review?	The Council will review its Anti-Social Behaviour Policy every three years or earlier to address legislative, regulatory, best practice or operational issues. New assessments will be undertaken every three years in conjunction with the review of the policy.

Step 6: Final steps	
17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer	
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded	

Reviewed by Legal Services: J.Wenham – 15.1.2025

Reviewed by Director of Housing & Public Protection:  
14.1.2025

