

Anti-Social Behaviour (Harm Focused) Policy

Date of policy 2026



Section One

Overview

Wolverhampton Homes (WH) is responsible for delivering a tenure neutral anti-social behaviour (ASB) service on behalf of the City of Wolverhampton Council (CWC).

The policy applies to the City of Wolverhampton Council's managing agents which are:

- Wolverhampton Homes
- Dovecotes Tenant Management Organisation
- New Park Village Tenant Management Co-operative
- Bushbury Hill Estate Management Board

In relation to Dovecotes TMO, New Park Village TMO and Bushbury Hill these managing agents will be responsible for the management of nuisance and low level ASB cases. Wolverhampton Homes has an agreement with these managing agents to support those cases which are more serious or persistent.

Wolverhampton Homes Anti-Social Behaviour (Harm Focused) Policy outlines the way in which we aim to address anti-social behaviour through a triple track approach of prevention and early intervention, enforcement and support

The policy does not apply to other registered social landlords (RSLs) operating in the City. Information on RSLs working in Wolverhampton can be found at:

[List of registered providers – 15 July 2024 \(accessible version\) - GOV.UK
\(www.gov.uk\)](https://www.gov.uk)

The City of Wolverhampton Council's Environmental Crime and Public Protection Teams manage reports about noise nuisance as well as other environmental nuisance such as fly-tipping and dog fouling which occurs in private housing or on privately owned land.

[Report noise nuisance | City Of Wolverhampton Council](#)

[Animal issues | City Of Wolverhampton Council](#)

[Environment and climate | City Of Wolverhampton Council](#)

The policy is reflective of the strategic priorities of the City of Wolverhampton Council's Community Safety Partnership. It aims to strengthen community capacity, supporting and empowering residents to resolve issues with their neighbours where possible, protect and support complainants and use informal and formal tools to tackle behaviour that we know can cause distress to individuals, households and communities.

Wolverhampton Homes applies a harm focused approach to tackling ASB. Our officers will consider the harm caused to individuals, households and communities

along with the type of ASB reported and the evidence available to us. This will collectively determine what course of action is appropriate.

Focus will be placed on processes and practices that seek to resolve issues at the earliest opportunity, stopping and changing offending behaviour where possible and with an emphasis on supporting both the complainant(s) and witness(es) of the ASB.

Definition of anti-social behaviour and harassment

The ASB, Crime & Policing Act 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

Harassment

Harassment is a form of ASB that is targeted at a person or a group of people for any reason. The definition of harassment as set out in the Equality Act 2010 is:

- any unwanted behaviour affecting a person's well-being or dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment

Wolverhampton Homes recognises the definition as set out in the Act.

Types of anti-social behaviour

Anti-social behaviour (ASB) is wide-ranging and can involve a variety of issues, some of which may include criminal activity. Wolverhampton Homes will take action to investigate reports made by Wolverhampton residents, our employees, and contractors. We also accept referrals from third parties, including elected members, MPs, West Midlands Police, and departments within the City of Wolverhampton Council.

- anti-social behaviour occurring in public spaces such as parks and shopping areas
- criminal activity within properties managed by Wolverhampton Homes, including drug use, supply, or cultivation
- damage to property
- deliberately setting or starting a fire, including bonfires or any other type of fire, as part of harassment, nuisance, or criminal behaviour.
- domestic abuse
- exploitation, including cuckooing
- harassment
- hate crimes or hate incidents

- persistent noise nuisance, such as loud music, shouting, or deliberate disturbance
- repeated use of abusive language or behaviour

Fly-tipping and dog fouling can be reported to Wolverhampton Homes as anti-social behaviour. However, depending on the circumstances, it may be handled by another team or referred to the City of Wolverhampton Council, they have primary responsibility for environmental enforcement.

Examples of issues that are usually not considered ASB

- babies crying – this is a natural part of family life and would not normally be investigated. However, if you have safeguarding concerns (e.g., neglect or harm), report it to Wolverhampton Homes and:
 - Call MASH (Multi-Agency Safeguarding Hub):
 - 01902 555392 (weekdays)
 - 01902 552999 (out of hours)
 - Use the online eMARF form <https://marf.wolverhampton.gov.uk/>
 - Call 999 if a child is in immediate danger
 - You can also contact the NSPCC for support or anonymous reporting
- bin-related concerns as these would be considered by the Tenancies Team and in conjunction with the City of Wolverhampton Council
- children playing, unless:
 - They cause damage to property
 - They are abusive, intimidating, or persistently inconsiderate
- cooking smells
- DIY or car repairs, unless frequent or at unsocial hours (11pm–8am)
- minor personal differences
- normal household noise, such as:
 - Dishwashers, hoovers, tumble dryers, washing machines (except during unsocial hours: 11pm–8am)
 - Doors and drawers opening/closing
 - Moving furniture
 - Flushing toilets or running water
 - Light switches
 - Talking or laughing
- one-off incidents, e.g., a party or argument
- parking-related issues
- smoking inside the home
- sexual noises
- shift workers leaving/returning late or early, including normal vehicle noise
- walking loudly on floors or upstairs
- where tenants have not breached their tenancy conditions

In cases which do not meet the legal or policy threshold to be dealt with as ASB, and where appropriate:

- we will refer residents to the Good Neighbour Charter - <https://www.wolverhamptonhomes.org.uk/help-support/anti-social-behaviour/good-neighbour-charter/> encouraging respectful and considerate behaviour
- we may refer the case to our Tenancy & Leaseholder Team for further actions. Here are some typical instances where a matter should be referred to the Tenancy Team rather than the ASB Team:
 - breach of tenancy conditions unrelated to ASB – for example, subletting without permission
 - property condition issues – for example, neglect of the home or garden, hoarding that affects safety but does not involve nuisance or harassment
 - occupancy or succession queries – for example, disputes about who is living in the property or requests for tenancy changes
 - non-ASB disputes – for example disagreements over boundaries or parking that does not involve harassment, intimidation or criminal behaviour
 - tenancy fraud concerns – for example false information being provided or illegal assignment of the tenancy.

Our approach to ASB

In delivering a tenure neutral ASB service, Wolverhampton Homes will take a balanced approach to tackling focusing on:

- **Prevention** - we understand the importance of resolving issues of ASB before it escalates. Not only in terms of making our neighbourhoods safer places, but the added value and cost effectiveness of early intervention.
- **Early intervention** - where appropriate we will intervene to address issues of ASB and we will work with our partners to deliver a range of interventions.
- **Enforcement** - where all reasonable steps have been taken to change or prevent ASB, or in serious cases of ASB, careful consideration will be given to the use of enforcement powers to deal with the problem.

We recognise that anti-social behaviour may be perpetrated by adults or by children. Appropriate interventions will be used depending on the age of the person responsible and legal context.

Anonymous reports

Wolverhampton Homes prefers to have direct contact with the person experiencing the ASB to fully understand the problems being experienced, offer appropriate support and provide updates on the investigation. Officers will investigate an anonymous report if it can be substantiated, making best efforts to do so. However, a positive resolution (outcome) is less likely when a report is made anonymously.

Criminal activity

Acts of criminality should be reported to the police.

The ASB Team will work to support West Midlands Police to tackle such behaviour. We will take action to enforce the City of Wolverhampton Council's Tenancy Agreement where criminal activity is linked to its properties. In some cases where criminal activity is occurring, it may be appropriate that we lead on the action required, for example, by obtaining Injunctions under the Anti-Social Behaviour, Crime & Policing Act 2014.

Cross tenure issues

There will be times where Wolverhampton Homes will need to involve or refer an ASB report to other agencies. Where this is the case, the ASB Officer will discuss with the relevant organisation who will take the lead role in coordinating specific actions. A partnership approach will be taken in relation to information sharing.

[County lines | West Midlands Police](#)

Domestic abuse

Wolverhampton Homes has a separate Domestic Abuse Policy but recognises that some reports of anti-social behaviour may indicate domestic abuse or safeguarding concerns. ASB Officers will work closely with our Domestic Abuse Team and relevant partners (including West Midlands Police) to identify and respond appropriately to such situations.

In line with the Think Family approach, officers will consider the needs and circumstances of the whole family throughout all investigations, ensuring that interventions are holistic and coordinated across agencies. This includes actively considering domestic abuse and safeguarding at every stage.

<https://www.wolverhampton safeguarding.org.uk/safeguarding-adults/think-family>

We will also:

- repair any damage at the home of the victim as a priority (where the victim lives in a Wolverhampton Homes property)
- provide advice on alternative housing options if required

Domestic abuse is a breach of tenancy and we will:

- support the police in prosecuting perpetrators by providing evidence. We will only do this if we have permission from the victim (unless the law makes us do so).
- consider excluding the perpetrator from the housing register where appropriate.
- demotion of tenancy due to domestic abuse offending where the offender is a tenant of a Wolverhampton Homes-managed tenancy
- charge the perpetrator for any damage they have caused
- share information in line with data protection legislation.

Where a joint tenancy exists and a victim is unable to return to their home due to risk of harm, we may take appropriate action to bring that tenancy to an end through the courts. We may also support perpetrators into other accommodation where available and appropriate.

[Wolverhampton Homes | Customer Domestic Abuse Policy](#)

Hate crimes

Hate crime differs from most crimes because it targets who the victim is or appears to be. It is any criminal offence perceived by the victim or others to be motivated by hostility or prejudice based on race, religion, sexual orientation, disability, or transgender identity.

Types of hate crime

Hate crime typically falls into three categories: physical assault, verbal abuse, and incitement to hatred.

- physical assault – a physical assault is the intentional application of unlawful force to another person without consent or legal justification. This includes any act of physical contact intended to cause harm, discomfort, or injury.
- verbal abuse – Threats, name-calling, or offensive language are distressing and protected by law.
- incitement to hatred – Actions intended to stir up hatred through words, images, videos, music, or online content. Examples include:
 - messages promoting violence against individuals or groups
 - websites or forums displaying violent or hateful material
 - online discussions encouraging hate crimes

Incidents involving any of the above should be reported to the Police.

Hate incidents

A hate incident is an incident where a crime has not been committed but where it is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice based on:

- a person's race or perceived race.
- a person's sex.
- any racial group or ethnic background including countries within the UK and Romani and traveller groups.
- a person's religion or perceived religion.
- any religious group including those who have no faith in a theology.
- a person's sexual orientation or perceived sexual orientation.
- a person who is transgender or perceived to be transgender (including people who are transsexual, transgender, cross dressers and those who hold a gender recognition certificate under the Gender Recognition Act 2004).

- a person's disability or perceived disability, including physical disability, learning disability and mental health or developmental disorder.
- any other perceived difference.

An incident or offence may be physical, verbal or written and can take many forms. including but not limited to:

- physical attack, such as, physical assault, damage to property or offensive graffiti
- threat of attack including offensive letters, abusive or obscene calls or texts.
- verbal abuse or insults.
- offensive leaflets and posters, hate mail, abusive gestures, or dumping of rubbish outside homes.
- harassment, bullying and victimisation.

Reporting hate crimes / incidents to the Police

Hate crimes should be reported to the Police. In an emergency, please call 999. If it is not an emergency, call 101.

If already registered with the [emergency SMS service](#), use the textphone service 18000 or text us on 999.

Or call [999 BSL](#) to use a British Sign Language interpreter.

Reporting hate crimes / incidents to Wolverhampton Homes

When a hate crime / hate incident has been reported, we will liaise with the police who may be the appropriate agency to lead on the case.

In relation to the housing management response, we will:

- contact the victim within one working day, considering any reasonable adjustments that are needed
- consider legal interventions
- provide advice on emergency housing
- where the victim lives in a Wolverhampton Homes-managed property, deal with any vandalism at the home of the victim as a priority
- work closely with other agencies such as the police and specialist support agencies to help support the victim/household. If the victim agrees, we will contact other agencies on their behalf.
- racist or offensive graffiti will be removed as soon as possible and always within two working days. Graffiti can be reported online through the City Council Street Cleansing Team or through Wolverhampton Homes.

Home invasion (also known as cuckooing)

Home invasion is a crime where a criminal gang exploit people by taking over their home to conduct illegal activities. This may be to deal or store drugs, use for sex work or trafficking. It can often be linked to county lines (organised criminal networks) and is a criminal offence.

Home invasion should be reported to the police as well as being reported to Wolverhampton Homes ASB Team.

Perpetrators

Wolverhampton Homes adopts a scaled approach when addressing perpetrators of ASB. Our priority is intervention, education, and diversion to help individuals change their behaviour and move away from anti-social activities. In some cases, perpetrators may be unaware of the impact they are causing; however, Wolverhampton Homes will use all available sanctions where warnings are ignored or the behaviour is serious enough to warrant immediate action.

All actions aim to achieve long-term solutions that reduce harm to complainants and provide opportunities for perpetrators to change, improving quality of life for the wider community. Recognising that a coordinated response is often required, cases may involve a multi-agency Professionals Meeting to ensure joint working and a consistent approach.

Prevention

Wolverhampton Homes seeks to minimise the risk of anti-social behaviour occurring by adopting a range of robust housing management practices such as, but not limited to:

- operating a robust allocation and sign-up process that clearly outlines the roles and responsibilities of both the person themselves and Wolverhampton Homes
- all new tenants being signed up as introductory tenants
- using measures to design out crime and ASB, such as CCTV, fencing, bollards and having a presence on our estates to provide help and reassurance to tenants and residents
- identifying hotspot times, such as bonfire night, and proactively managing these to prevent ASB from occurring
- monitoring ASB incidents to identify any trends. We will use this information to undertake targeted campaigns to tackle issues, raise and increase confidence within the community and identify the root causes to achieve longer term resolutions
- publicising positive action taken to resolve ASB wherever possible. This may include press releases to local newspapers, radio or television or other publicity materials such as social media, leaflets and posters in the locality of where legal action has been successful.

Wolverhampton Homes will use early intervention measures to establish clear standards of behaviour and to reinforce the message that anti-social behaviour is not tolerated. It also helps prevent poor behaviour from escalating.

We will also seek to encourage the principles as outlined in our Good Neighbour Charter which seeks to prevent disputes arising and reduce the risk of anti-social behaviour - <https://www.wolverhamptonhomes.org.uk/help-support/anti-social-behaviour/good-neighbour-charter/>

Support for Complainants and Managing Perpetrators with Additional Needs

Wolverhampton Homes recognises that anti-social behaviour can have a serious and lasting impact on individuals, families, and communities. We are committed to providing tailored support to those affected and working collaboratively with partner agencies to address complex cases.

Support for Complainants

To help us investigate your case effectively, Wolverhampton Homes asks that complainants positively engage with the process by providing supporting evidence such as diary sheets, video footage, and noise recordings, and by being open to mediation as an early resolution tool. This collaborative approach enables us to investigate thoroughly and provide the best possible support.

Support will vary depending on the nature of the ASB and the harm caused and will be driven by the individual's needs. We will ensure the voice of those experiencing ASB is heard by:

- having meaningful conversations to understand what they want from the process
- explaining available options so they can make informed decisions
- making referrals to advocacy and other support agencies where appropriate

Once a report becomes a case, Wolverhampton Homes will:

- provide a dedicated point of contact throughout the process
- give updates within timescales agreed with the reporter, using their preferred method (email, phone, or via a third party)
- where appropriate, assess the home to identify and implement additional safety measures

Support for perpetrators with additional needs

We acknowledge that some residents have additional support needs that may contribute to behaviour perceived as anti-social. These may include poor mental health, learning difficulties, or substance misuse.

In such cases, Wolverhampton Homes will:

- carry out a risk assessment to identify what support needs are required.
- work closely with support agencies to seek to improve behaviour while ensuring the individual receives appropriate help
- refer to specialist treatment providers and partner services as needed
- where necessary, convene Professionals Meetings to coordinate a multi-agency response

Support for complainants of hate crimes and hate incidents

Hate-related incidents are treated as a priority. We will make contact with the victim within one working day of receiving a report. Given the harmful impact of hate incidents, every effort will be made to understand the effect on the victim and respect their wishes when determining a course of action.

Specialist support will be offered to complainants and witnesses, including referral to Remedi's Step Up, Beat Hate service (remediuk.org).

Witness and Court Support

The support for witnesses will vary, depending on the type of anti-social behaviour witnessed and the harm caused. The ASB Team will make referrals to other support agencies, as and when required.

Once an enquiry has converted into a case, the following service offer will be in place:

- where relevant, provide feedback regarding the progress of the case
- there will be one point of contact for witnesses throughout the process

Where attendance at court is required, we will:

- explain the process from the outset
- offer free transport to court
- help prepare witness statements and provide advice on what to expect
- reimburse childcare costs if needed to enable attendance

Support Options

Advocacy

Advocacy helps to ensure that people's voices, wishes and preferences are heard, their rights are upheld, and their needs are met, particularly when they have difficulty in speaking up for themselves or are concerned that they are not being heard.

An advocate helps people with health and social care needs to express their needs and wishes, and to weigh up and make decisions about options available to them. Advocates can help people make sure correct procedures are followed and challenge decisions made by Councils, health services and other relevant health-based organisations.

<https://www.wolverhampton.gov.uk/health-and-social-care/adult-social-care/advocacy>

Multi-Agency Safeguarding Hub (MASH)

The Multi-Agency Safeguarding Hub (MASH) is Wolverhampton's single point of contact for all safeguarding concerns and early intervention requests—covering both children and young people, and adults with care and support needs.

During ASB investigations, Wolverhampton Homes will follow its safeguarding procedures. Where concerns arise about a child, young person, or vulnerable adult, referrals will be made to MASH and support from other agencies may be arranged.

[WH Safeguarding Policy 2024-2026.docx](https://www.wolverhampton.gov.uk/documents/10180/10181/WH_Safeguarding_Policy_2024-2026.docx)

We recognise that anti-social behaviour can affect everyone, but it can have a particularly serious impact on children and adults with additional needs.

Wolverhampton Homes is committed to working closely with relevant agencies to provide appropriate support and safeguarding for those most affected.

<https://win.wolverhampton.gov.uk/kb5/wolverhampton/directory/service.page?id=QERJ9YZTg9U>

Mediation

Mediation involves working one-to-one with individuals. It is about working with people to help them bring about positive change and empower them to take responsibility for their actions and behaviour. Mediation offers a balanced and positive way of sorting things out before the situation escalates.

Requests to move

When complainants or perpetrators of anti-social behaviour express a wish to move, ASB Officers will provide advice and signpost to relevant guidance. They will liaise with West Midlands Police where there are significant safety concerns. However, ASB Officers cannot influence housing application banding or decisions regarding homelessness, as these are determined by the Council's Allocations Policy and homelessness legislation. For further information, see the following links:

<https://www.wolverhampton.gov.uk/sites/default/files/2025-10/New-Housing-Allocations-Policy-2025.pdf>

<https://www.wolverhampton.gov.uk/housing/homelessness>

Working in partnership

Wolverhampton Homes values strong partnerships with residents and a wide range of agencies to deliver the best outcomes. Where appropriate, another agency may take the lead, and all parties will be informed. Personal information will only be shared with consent, except where safeguarding applies.

We work with partners such as the City of Wolverhampton Council, Community Safety Partnership, Environmental Services, Social Care, Health, and Education. We also take part in *Love Your Community* sessions, giving residents the chance to connect with agencies and discuss local issues, including ASB.

Find out more about these sessions - <https://www.wolverhampton.gov.uk/news/join-community-sessions-shine-spotlight-local-issues>

We will also collaborate with voluntary and third-sector organizations when this supports complainants' or perpetrators needs, always respecting their choices and obtaining consent before sharing information or making referrals.

Section Two

ASB Case management

This section explains how anti-social behaviour can be reported, expected response times to the initial complaints, and how reports are assessed before progressing to case investigation. Perpetrators are usually given the chance to change behaviour before enforcement, but action may be taken swiftly to protect the community if necessary.

The procedure follows four flexible stages, always aiming to meet the needs of those involved.

Reporting ASB

Anti-social behaviour can be reported via the following methods:

- Email - asbu@wolverhamptonhomes.org.uk
- Email – [Wolverhampton Homes | Report anti-social behaviour](#)
- Telephone via Homes Direct 01902 556789 / 01902 551188

Stage 1 – Initial Enquiry/Report and Assessment

The initial enquiry is triggered on receipt of a new report of ASB. At this stage, the enquiry will be assessed. Depending on the nature of the report, it will follow one of the following paths:

- allocated to an ASB Officer to be investigated
- referred to the City of Wolverhampton Council Environmental Health Public Protection Team (see Section One)

Deemed not to meet the criteria for ASB. Where this is the case, feedback will be provided as to why it does not meet the criteria. Reference may also be made to the Good Neighbour Charter - <https://www.wolverhamptonhomes.org.uk/help-support/anti-social-behaviour/good-neighbour-charter/>

We prioritise reports based on the seriousness and urgency of the issue:

Category A – Urgent and High Risk

Includes:

- domestic abuse
- hate crimes or hate incidents
- physical violence
- threats, harassment, or intimidation
- criminal behaviour or crime

Response time: Within 1 working day

Category B – Serious but Lower Immediate Risk

Includes:

- noise nuisance (within Wolverhampton Homes-managed properties)
- drug or alcohol-related issues
- street nuisance
- vandalism or damage to property

Response time: Within 3 working days

Category C – Low Risk / Environmental Nuisance

Includes:

- misuse of communal areas or loitering
- garden nuisance
- litter, rubbish, or fly-tipping
- nuisance from vehicles
- pets or animal-related nuisance

Response time: Within 5 working days

Category D – Does not meet the threshold

Category D reports do not meet the policy or legal threshold for anti-social behaviour. However, we understand that concerns raised are important. Depending on the nature of the situation, we will provide advice and guidance to help you manage it. Where appropriate, we may pass your case to another team within Wolverhampton Homes or signpost you to a partner agency that can offer the right support.

Response time: Within 5 working days

Risk assessments

Risk assessments will be completed once the complainant has been interviewed following the receipt of the initial report. Risk assessments are used to identify factors that might put a person at a higher risk of harm, assisting officers to identify people who have additional support needs. This may include considering urgent legal action or referring the case to a local partnership meeting to create an action plan with our partner agencies.

Reviews of risk assessments will be carried out regularly, taking into account any changes in the circumstances of the case or the complainant. We will review the assessment every three months where the case remains open for that period of time or longer.

Stage 2 – Case Investigation

Once the initial review confirms an ASB case and the victim wishes to proceed, or the matter is serious enough to warrant action, a full investigation will begin.

The assigned ASB Officer will arrange a meeting with the victim, offering a home visit, telephone call, or neutral location to suit their preference. During this meeting, the officer will:

- clarify the details of the ASB
- gather additional information
- identify any support needs
- explain the investigation process to ensure transparency

An action plan will then be created to record:

- incident chronology
- agreed actions
- multi-agency meetings and referrals
- risk assessments
- future steps (e.g., next contact date, reassessment schedule)

Evidence gathering may include:

- witness and perpetrator interviews
- statements
- liaison with West Midlands Police
- CCTV footage
- noise monitoring (equipment or app recordings)
- engagement with other agencies
- signposting and referrals

Throughout the investigation, the ASB Officer will make every effort to maintain contact with the victim. If all reasonable attempts (phone, text, email) fail, a letter will be sent requesting contact within 5 working days. If no response is received, the case will be closed.

Interviewing the alleged perpetrator

There will be times when urgent action is required which means Wolverhampton Homes would not be able to interview the perpetrator first. Where doing so may pose too great a risk, this may also mean an interview may not take place.

However, in the majority of cases we will contact the alleged perpetrator to arrange an interview with them. The interview can take place either by telephone or face to face. The alleged perpetrator will be informed that the purpose of the interview is to:

- inform them of the allegation(s)
- provide them with an opportunity to respond to the allegation and give their side of the story
- discuss potential options to resolve the matter

Stage 3 – Initial Case Review

Case reviews will take place after the case has been open for one month and then every three months.

Reviews will consider factors such as:

- evidence gathered to date
- whether ASB is persistent or severe
- updated risk assessments for all parties

Outcomes:

- No further action – case closed, which may occur if:
 - no further ASB reports
 - insufficient evidence to identify a perpetrator or confirm ASB
 - evidence is unreliable or does not meet the legal threshold
 - legal or tenancy action would be disproportionate

Before closure, the ASB Officer will contact the complainant to discuss the decision. The case may remain open if new evidence or information is likely to progress it.

ASB continues

If there is evidence of ASB, officers will continue to investigate. If there are no reported incidents for a 4-week period or the incidents have reduced significantly in persistence and severity so that they no longer meet the threshold, the ASB Officer will consider closing the case and will discuss this with the victim(s) at the next contact, setting out why they are closing the case.

Stage 4 – Case Closure

The ASB procedure aims to ensure cases remain open only as long as necessary, while closing them appropriately.

Cases may be closed at any stage for reasons such as:

- lack of cooperation from victims or witnesses
- confirmation that the incident did not occur
- issues reported are not deemed ASB by the ASB Team
- insufficient evidence to meet the required standard of proof
- the ASB has ceased and the risk of recurrence is low

Closure will be documented on a Closure Notice, detailing actions taken and decisions made.

ASB Officers will inform complainants/witnesses when a case is being closed and explain the reasons. The rationale will also be recorded in the case action plan.

Section Three

Non-legal and Legal Measures to Address Anti-Social Behaviour

Wolverhampton Homes uses a range of non-legal and legal measures to prevent and address anti-social behaviour. These tools enable us to respond proportionately and effectively, balancing enforcement with support to achieve safer communities and positive outcomes for all involved.

Non-legal Measures

The ASB Team uses various non-legal measures to reduce or resolve anti-social behaviour (ASB), selecting the most appropriate approach for each case. If these fail, legal action may follow, requiring robust evidence. Victims who refuse early interventions will be advised this could affect case progression.

Advice Conversations/Letters

These are used to alert individuals that their behaviour is problematic and should stop. Particularly useful for informing parents/guardians about a child's involvement in ASB or making perpetrators aware of the impact of their actions (e.g., noise nuisance).

Verbal Warning

Verbal warnings act as an immediate response to proven ASB, explaining the behaviour, its impact, and consequences if it continues. Face-to-face meetings are preferred to identify underlying issues (e.g., substance misuse, mental health) and offer support. Records are kept and shared with partners.

Mediation

External, independent mediation is encouraged to help parties communicate and resolve disputes. Both parties must be willing to participate. The service is:

- free
- confidential (except safeguarding/criminal matters)
- delivered by trained professionals
- focused on fairness and quality outcomes

Acceptable Behaviour Contract (ABC)

An ABC is a voluntary agreement for individuals aged 10+ involved in ASB, often arranged with partner agencies. It sets out prohibitions and positive actions to divert behaviour, lasting six months with a mid-term review. It can be extended with evidence or ended early for good behaviour. Although not legally binding, an ABC can support formal action such as Civil Injunctions or Criminal Behaviour Orders if behaviour escalates.

Legal Measures

If legal action is pursued, Wolverhampton Homes must prove ASB on the balance of probabilities and show that any action is proportionate. The listed options are tools considered at appropriate stages, often with partner agencies, and not a fixed sequence. For young people, multiple interventions and monitoring usually precede formal measures.

Wolverhampton Homes may support rather than lead on some interventions by gathering evidence, assisting complainants/witnesses, or taking action based on partner applications.

Evidence Standard

ASB cases follow civil law, requiring proof on the balance of probabilities. If evidence is evenly balanced or insufficient, the case fails. Courts also require that orders sought are reasonable and proportionate.

External factors, such as court date availability, can delay cases; victims and witnesses will be kept informed.

Civil Injunction

Police, Local Authority, or Registered Housing Providers can apply for Civil Injunctions to protect individuals and communities and set behaviour standards. Often used when an ABC is breached, injunctions can impose prohibitions and positive requirements. Two tests apply:

- has the defendant engaged in ASB?
- is it just to grant the injunction?

Applications for under-18s require consultation with the Youth Justice Service. Breach is contempt of court (not a criminal offence) but serious—penalties for adults include up to 2 years' imprisonment, fines, or asset seizure.

Parenting Contracts & Orders

- Parenting Contract: Voluntary agreement to improve parenting skills and guide behaviour, considered when a young person on an ABC shows no improvement.
- Parenting Order: Court-imposed when a parent refuses or fails to comply with a contract, often alongside a Civil Injunction to reinforce positive behaviour.

Criminal Behaviour Order (CBO)

Applied for by Crown Prosecution Service after a criminal conviction, targeting serious, persistent offenders. Must be considered at sentencing, not afterward. For under-18s, Youth Justice Service views are required. Includes prohibitions and positive requirements. Breach of an order is a criminal offence.

Community Protection Warnings & Notices (CPW/CPN)

Issued by the Council or Police (not Wolverhampton Homes) to stop persistent, unreasonable ASB affecting community life (e.g., noise, rubbish). A breach of an order is a criminal offence and can lead to a fine.

Public Spaces Protection Order (PSPO)

PSPO's are a local authority tool to restrict use of public spaces to tackle persistent nuisances. Breach is a criminal offence, punishable by removal from area, fixed penalty, or court fine up to £1,000.

Closure Power

This power allows Police or the local authority to close premises causing serious nuisance:

- Closure Notice: Up to 48 hours; non-compliance is a criminal offence.
- Closure Order: Court-approved, up to 3 months (extendable to 6). A breach can lead to fines or imprisonment.

Dispersal Power

Police can direct individuals causing or likely to cause harassment, alarm, or distress to leave an area for up to 48 hours (authorised by an Inspector or above). Breach is a criminal offence, punishable by fine or imprisonment.

Further Intervention Methods

Introductory Tenancies

An introductory tenancy is a 12-month trial tenancy offered by social landlords before granting a secure tenancy. It gives tenants fewer rights and makes it easier for the landlord to end the tenancy if conditions—such as acceptable behaviour—are breached. The period can be extended by up to 6 months in certain circumstances.

Demotion Orders

A Demotion Order is a legal measure that allows for the reduction to a tenant's secure tenancy to a less secure "demoted" tenancy when the tenant, household members, or visitors have engaged in anti-social behaviour or used the property for illegal or immoral purposes.

Possession

Possession is a legal measure that allows for a landlord to seek possession of a property for ASB. It means the court is asked for an order to end the tenancy and take back the property because the tenant (or someone living with or visiting them) has engaged in ASB.

Absolute Grounds for Possession

This allows for the mandatory possession of a property if any of these occur:

- conviction for serious criminal offence
- breach of Civil Injunction or CBO
- property closed under Closure Order
- breach of Noise Abatement Notice

The Court must grant possession if procedure and proportionality are met.

Tenancy Injunction (introductory and secure tenancies)

Social landlords can seek injunctions for tenancy breaches; non-compliance can lead to up to 2 years' imprisonment.

Section Four

Complaints about service delivery

If a victim, witness or alleged perpetrator of anti-social behaviour is dissatisfied with Wolverhampton Homes response to tackling ASB or objects to the enforcement action we decide to take them, a complaint can be made via our Complaints Policy - [Wolverhampton Homes | Complaints and compliments](#)

ASB Case Review (formerly known as Community Trigger)

An ASB Case review gives complainants of ASB or hate crimes/incidents the right to request a review if they are not satisfied with how their case has been handled.

If a request meets the required criteria (also called the threshold), the following agencies will have a duty to carry out a case review:

- City of Wolverhampton Council
- Wolverhampton Homes ASB Team
- West Midlands Police
- Social housing providers

For a review to take place, one of the following criteria needs to be met:

- an individual has reported three separate incidents relating to the same problem in the past six months to the Council, Police or your landlord
- an individual has reported one incident or crime motivated by hate (due to race, religion, disability, sexual orientation or transgender identity) in the last six months and no action has been taken
- at least 5 people have made reports about the same problem in the past six months to the Council, Police or your landlord and no action has been taken

To qualify for a review, the ASB/hate crime must be reported within one month of the alleged behaviour taking place.

The ASB Case Review can be used by:

- a person who believes they have experienced harassment, alarm and distress and are not satisfied with the response they have received from agencies
- a person acting on behalf of a victim, for example, a family member, friend, carer, councillor, MP or another professional person. The victim's consent should be sought by the person using the ASB Case Review on their behalf. This can be an individual, a business or a community group.

[Individual request for ASB Case Review | City Of Wolverhampton Council](#)

[Group request for ASB Case Review | City Of Wolverhampton Council](#)

Section Five

Legal Framework

This policy is informed by key legislation, including:

- Housing Acts 1985 & 1996
- Crime and Disorder Act 1998
- Equality Act 2010
- Human Rights Act 1998
- Anti-Social Behaviour Act 2003
- Data Protection Act 2018

It also meets the Regulator of Social Housing's *Neighbourhood and Community Standard*, which requires providers to work with partners to prevent and tackle ASB and publish a policy outlining this approach.

Equality and Diversity

Under the Equality Act 2010, individuals with protected characteristics are safeguarded against discrimination, harassment, and victimisation. This policy ensures inclusivity and that ASB services meet diverse needs of both service users and those subject to action.

When pursuing legal action, Wolverhampton Homes will comply with its Public Sector Equality Duty - <https://www.gov.uk/government/publications/public-sector-equality-duty>

The ASB Officer will complete an Equality Act Assessment to confirm:

- any protected characteristics and existing support services
- that proposed action is proportionate, reasonable, and a legitimate means of addressing the behaviour

Service standards & service improvement

If an ASB case is opened, we will ensure the following:

- a named officer will oversee the initial enquiry and where appropriate, a case investigation.
- the ASB procedure is thoroughly explained to all complainants and witnesses & realistic expectations are set.
- support is tailored to the needs of the individual
- for the duration of the case, complainants and witnesses will be kept updated on the progress of the case.

In order to continuously improve our service, we ensure that complainants are asked to provide feedback regarding their experience of the Anti-Social Behaviour Service via closed case surveys conducted by an external company.

Wolverhampton Homes will also take into consideration the findings of the outcome of surveys done in relation to the Tenant Satisfaction Measure (TP12) which measures the landlord's approach to handling anti-social behaviour.

Information Exchange and Confidentiality

Wolverhampton Homes' Anti-Social Behaviour Team complies with the City of Wolverhampton Council Safety Partnership's Information Sharing Protocol to ensure lawful and secure data exchange during investigations.

The team will ensure that all data is:

- collected for a clear, legitimate purpose and used only for that purpose
- processed lawfully, fairly, and transparently
- relevant, limited, accurate, and promptly updated
- protected with appropriate security measures

Complainants and witnesses are asked to provide written consent for actions and referrals to support services. If consent is withheld but ASB can be evidenced independently, the team will proceed without compromising complainant safety.

Where any party to an ASB complaint prefers a third party as their contact, consent will be obtained first.

Section Six

ASB Glossary

Affidavit: A written description of events that have been witnessed by someone. This is sworn on a religious book such as the bible.

Affirm: Confirm the truth of something in Court (this is used as a non-religious alternative to an oath).

Anti-social behaviour case review: the anti-social behaviour case review (previously referred to as community trigger) gives individuals and communities the right to request a review of their anti-social behaviour case, where the locally defined threshold is met.

Barrister: A legal representative that can put someone's case to the Court and question witnesses.

Breach: When the terms of an Order have not been kept.

Comittal case: A case, following alleged breach of injunction, where the judge hears evidence and makes a decision whether to send the person to prison.

Complainant: The person who allegedly suffered from, and complained about, an incident of anti-social behaviour.

Contempt of Court: When someone disobeys certain orders of the Court, such as injunction, or misbehaves in court.

County Court: a Court where civil cases are heard.

Defendant: The person against whom legal proceedings are brought.

Demotion Order: An Order that ends an existing assured or secure tenancy replacing it with a tenancy with less security of tenure.

Hearsay evidence: Evidence based on what someone has told the witness and not of direct knowledge that is being relied upon to demonstrate the apparent truth of what the witness was indirectly told.

Magistrates' Court: A Court where criminal proceedings are heard and that deals with the less serious offences.

Perpetrator / alleged perpetrator: Person who carried out or is alleged to have carried out anti-social behaviour

Plaintiff: The person or organisation that is bringing the case to court.

Possession case: A hearing to decide if a tenant should be evicted from their home.

Power of Arrest: The power attached to injunctions (or certain clauses of an injunction) which if a police officer suspects a person to have breached will authorise the police officer to arrest the person for breach of injunction and the person arrested must then be brought before the court within 24 hours to answer allegation of breach of an injunction.

Solicitor: A legal representative who can put someone's case to Court and obtain the use of a Barrister in Court.

Statement: A written account of events that a witness signs as a true record of what has been witnessed. Knowingly lying on a witness statement can result in prosecution.

Suspended sentence: A prison sentence that is only enforced if the perpetrator breaks the conditions on which the order is suspended within a time scale set by the judge.

Swear on oath: Confirm the truth of something in court that is sworn on a bible or other holy book.

Tenancy Agreement: A legal contract between a landlord and a tenant that defines the tenants and landlords' rights and responsibilities in respect of the property the tenant occupies.

Undertaking: A promise made to the Court by the perpetrator either to do something or refrain from doing something. Breach of undertaking carries the same penalties as breach of an injunction.

Complainant: The person who suffers from, and complains about, an incident of anti-social behaviour.

Support Organisations Directory

Organisation	Description and contact details
Age UK	<p>https://www.ageuk.org.uk 0800 678 1602 Provides services and support at a national and local level for people over 60 in the UK</p>
Base 25	<p>29-31 Temple Street, Wolverhampton WV2 4AN 01902 572040 info@base25.org Supports children, young people and families in shaping their lives.</p>
Changing Lives	<p>https://www.changing-lives.org.uk/contact 0191 273 8891 Provides support for people living in crisis, including those with addiction, homelessness and a specialist women's service.</p>
City of Wolverhampton Council Family Hubs	<p>https://www.wolverhampton.gov.uk/health-and-social-care/children-social-care/family-hubs A Family Hub is a place where children, young people and their families can go when they need support</p>
Citizens Advice	<p>https://www.citizensadvice.org.uk/ 03444 111 444 (Advice line) 0345 000 0046 (Consumer advice) Provides free advice in all matters, find a local Citizens Advice online.</p>
Community Support Services	<p>Community.Support@wolverhampton.gov.uk Community Support Team, Snow Hill, City Centre, Wolverhampton, WV1 3AX 01902 553445 Confidential advice and information service enabling residents over 18 in Wolverhampton to live independently.</p>
Engage Youth Empowerment Services (EYES)	<p>58 Bank Street, Bilston WV14 8PD 07898 599540 Delivers bespoke prevention and intervention projects for young people who are vulnerable or at risk</p>
Leasehold Advisory Service	<p>https://www.lease-advice.org/ Free legal advice to leaseholders and landlords. Book an appointment online</p>
Mencap	<p>https://www.mencap.org.uk/ 0809 808 1111 Works in partnership with people with a learning disability</p>
Mind	<p>https://www.mind.org.uk/ 0300 123 3393 Mental health charity for people in England and Wales.</p>
P3	<p>https://www.p3charity.org/services/wolverhampton-housing-and-homeless-service 01902 2964 Out of hours: 0800 1076753</p>

	A pathway service supporting people who are experiencing homelessness
Recovery Near You	<p>bsmhft.recoverynearyou@nhs.net 5-9 Pitt Street, Wolverhampton WV3 0NF Free, confidential service for anyone in Wolverhampton concerned about their own or someone else's drinking or drug use.</p>
RNIB	<p>0303 123 9999 Charity providing practical and emotional support to blind and partially sighted people.</p>
Samaritans	<p>https://www.samaritans.org/ jo@samaritans.org 116 123 (freephone) A UK and Ireland charity providing 24/7 emotional support for people in distress or suicidal, offering a free, confidential helpline aiming to prevent suicide</p>
Scope	<p>https://www.scope.org.uk/ Provides support, information and advice to disabled people and their families</p>
SSAFA	<p>https://www.ssafa.org.uk 0800 260 6767 Charity that supports ex-service personnel</p>
St George's Hub	<p>St Mark's Rd, Wolverhampton WV3 0QH 01902 421904 Works with the region's most vulnerable and marginalised men</p>
The Haven	<p>Domestic Abuse Helpline: 08000 194 400 WhatsApp: 07719 558 183 referralpoint@havenrefuge.org.uk Provides support for women and children subjected to domestic abuse, and women at risk of homelessness</p>
The Good Shepherd	<p>65 Waterloo Rd, Wolverhampton 01902 399955 office@gsmwolverhampton.org.uk Mission to end homelessness, support recovery, and create pathways out of poverty.</p>
The Royal British Legion	<p>0808 802 8080 (Free from UK) - ww3.britishlegion.org.uk Provides practical care, advice and support to members of the Armed Forces, veterans and their families</p>
Victim Support	<p>Victim support provides free, confidential, and tailored help to people affected by crime, offering emotional support, practical guidance (like court info, safety plans), and connecting them to specialist services - https://www.victimsupport.org.uk/help-and-support/how-we-can-help/</p>
Wolverhampton Voluntary & Community Action	<p>Provides dedicated support by working alongside people, communities, groups and organisations - https://www.wvca.org.uk/</p>