

# City of London Corporation Committee Report

<b>Committee(s):</b> Housing Management and Almshouses Sub-Committee – For information	<b>Dated:</b> 26 November 2025
<b>Subject:</b> <b>Anti-Social Behaviour Policy Update and Spotlight Item</b>	<b>Public report:</b> For Decision and discussion
<b>This proposal:</b> <ul style="list-style-type: none"><li>• <b>delivers Corporate Plan 2024-29 outcomes</b></li><li>• <b>provides statutory responsibilities</b></li><li>• <b>provides business enabling functions</b></li></ul>	Providing Excellent Services  Regulator of Social Housing (RSH) Community and Safety Standards
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	£
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	
<b>Report of:</b>	Peta Caine, Director of Housing
<b>Report author:</b>	Helen Chantry, Interim Head of Housing Management

## Summary

### Victim-Centred Amendments to Anti-Social Behaviour (ASB) Policy

This summary outlines proposed victim-centred insertions to the City of London Housing Anti-Social Behaviour (ASB) Policy. The aim is to align the policy with statutory updates introduced by the 2025 Police Bill and recommendations from the Victims' Commissioner's 2024 report, 'Still Living a Nightmare'. These changes seek to improve support for victims of persistent ASB and ensure their voices are central to the response process.

## **Recommendation(s)**

**This report provides Members with an update on Anti-Social Behaviour and the landlord's responsibilities using a victim centred approach, reflecting ASB Statutory Changes from the 2025 Police Bill and considering the requirements of the Regulator of Social Housing (RSH) Community and Safety Standard.**

Members are asked to note the report and shared responsibilities between Housing Management and Community Safety (Appendix 3).

Members are asked to approve the policy amendments and new insertions covered in Appendices 1 & 2.

## **Main Report**

### **Background**

#### **Tackling Anti-Social Behaviour: Our Role as a Landlord**

As a social landlord, we have a clear responsibility to support tenants who are affected by ASB and to take prompt, effective action.

The Anti-Social Behaviour, Crime and Police Act 2014 Part 1 section 2 defines the meaning of ASB as:

- a) conduct that has caused, or is likely to cause, harassment, alarm, or distress to any person
- b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises
- c) conduct capable of causing housing-related nuisance or annoyance to any person

### **Context**

1. In November 2024 the introduction of Respect Orders was announced by the Government aimed at addressing persistent ASB and enforcement outcomes included criminal conviction and prison sentences for breaking the order's terms.
2. The Respect Orders were greatly influenced by the findings and recommendations in the Victims' Commissioner's 2024 report, titled "Still living a nightmare: Understanding the experiences of victims of anti-social behaviour."

3. The report highlighted systemic failures in how victims of persistent ASB are treated, calling for improved communication, support access, and recognition under the Victims' Code. The revised statutory guidance now mandates proactive victim engagement, assignment of Single Points of Contact (SPoCs), and multi-channel access to the ASB Case Review process.
4. In tandem, the 2025 Police Bill introduced new enforcement tools and statutory duties, including Respect Orders, mandatory ASB data sharing, and enhanced dispersal powers.
5. The City of London Corporation's Housing Service ASB Policy review (last re-approved June 2024) reflects a concerted effort to align with national ASB agendas and enhance victim experience.

## **Summary of Proposed Changes**

The following summary of insertions are proposed to strengthen the City of London Housing ASB Policy (Appendix 1):

- Assign a Single Point of Contact (SPoC) to victims of persistent ASB.
- Proactively inform victims of their right to request an ASB Case Review after repeated reports.
- Recognise persistent ASB victims under the Victims' Code, regardless of criminal thresholds.
- Enable public referrals to the Community Safety Team for appropriate high-risk ASB cases.
- Monitor compliance with Acceptable Behaviour Contracts and Community Remedies.
- Prepare for implementation of Respect Orders as part of the enforcement toolkit.
- Establish systems for mandatory ASB data reporting to the Home Office.
- Align fly-tipping enforcement procedures with forthcoming statutory guidance.

The following additional policy points are proposed to be inserted to strengthen the City of London Housing ASB Policy (Appendix 2):

## **Summary of Enhanced Focus on Vulnerability and Equality**

- **Explicit Equality Act Consideration:** The policy now formally requires the City of London to demonstrate that they have considered any vulnerability identified within the Equality Act 2010 when deciding to proceed with legal action against a perpetrator.

- **Vulnerability-Led Intervention:** The decision to pursue legal action must conclude that it is needed due to the effect of the ASB on either the wellbeing of the victim and/or the perpetrator. This ensures a harm-centred approach.
- **Support for Perpetrators:** There is an explicit commitment to support perpetrators who exhibit ASB to ensure they have the opportunity to take part in diversionary activities, where appropriate, to address root causes.

## Options

None

## Proposals

It is proposed that an ASB case management process review is undertaken to ensure that best practice is being followed. A further report will be provided to Members once Housing Management have transitioned to the new ASB module in Civica CX.

## Key Data

### Corporate & Strategic Implications

**Strategic Alignment:** The Anti-Social Behaviour policy update supports the Corporate Plan 2024–2029 and includes a Victim-centred approach, aligning with the RSH requirement to put tenants at the heart of the conversation.

**Financial Implications:** None

**Equalities Considerations:** An Equality Impact Assessment is underway to ensure compliance with the Public Sector Equality Duty 2010.

**Operational Readiness:** Policy to be updated

## **Appendices**

### **Appendix 1**

Tracked Changes: Victim-Centred Insertions to City of London ASB Policy V3

#### **Section 4.1 – Victim Support**

Each victim of persistent ASB will be assigned a Single Point of Contact (SPoC) to ensure consistent communication and support throughout the case.

Rationale: Aligns with 2025 guidance to improve victim engagement and simplify the terms

#### **Section 4.2 – Reporting and Transparency**

Victims reporting ASB more than once within six months will be proactively informed of their right to request an ASB Case Review.

Rationale: Addresses gaps in awareness identified in the 2024 Commissioner's report

#### **Section 4.3 – Vulnerability and Risk**

Victims of persistent ASB will be recognised under the Victims' Code, regardless of whether the behaviour meets criminal thresholds.

Rationale: Ensures access to support services and rights for all victims

#### **Section 6 – Risk Assessment**

Repeat victimisation will automatically trigger a review of support needs and consideration for multi-agency intervention.

Rationale: Responds to findings that victims often suffer for years without a resolution

#### **Section 8.2 – Multi-Agency Risk Assessment Conference (CCM)**

The CCM will include a standing agenda item to review cases involving repeat ASB victims and ensure coordinated safeguarding responses.

Rationale: Embeds victim-centred oversight into strategic case management

#### **Section 9 – Publicity and Data Control**

Anonymous data on ASB Case Reviews and victim outcomes will be published annually to improve transparency and accountability.

Rationale: Supports national data-sharing goals and provides reassurance

## Appendix 2

New Policy Point	Suggested Document Insertion Point	Rationale
<b>PSED &amp; Protected Characteristics Commitment</b>	<b>Section 1.0 (Introduction/Policy Statement):</b> After the main policy statement but before the definitions of ASB.	This establishes the legal framework and commitment early on, making it clear that equality duties underpin the entire policy.
<b>Harm-Centred Approach</b>	<b>Section 2.0 (ASB Definition &amp; Scope):</b> Insert as a sub-point or principle within the scope of the policy.	It changes <i>how</i> ASB is fundamentally assessed—by impact (harm) rather than just the action—so it belongs near the core definition.
<b>Vulnerability Assessment</b>	<b>Section 3.0 (Reporting and Investigation Procedures):</b> Insert this as the first step in the investigative process.	An assessment of vulnerability for all parties (victim, witness, perpetrator) must be a mandatory initial step once a case is opened.
<b>Proportionality and Legal Action</b>	<b>Section 4.0 (Enforcement and Legal Action):</b> Insert as a crucial pre-requisite or sub-section under any clause detailing formal action (e.g., injunctions, possession claims).	This is a legal check required before the final, most serious enforcement steps are taken against a potentially vulnerable individual.
<b>Internal Review / EIA</b>	<b>Section 6.0 (Policy Governance and Review):</b> Insert this in a new clause detailing the internal review cycle and document maintenance.	This is an operational requirement to ensure the policy remains lawful and effective over time.

## Appendix 3

### ASB Statutory Changes from the 2025 Police Bill: Responsibilities Table

ASB Change	Housing Management	Community Safety
Respect Orders	✓ (if tenant-related: evidence, monitoring)	✓ (enforcement, breach response)
ASB Case Review Enhancements	✓ (SPoC assignment, victim support, awareness)	✓ (multi-agency coordination)
Absolute Ground for Possession	✓ (tenancy enforcement following ASB conviction)	X
Victim-Centred Approach (Victims' Code)	✓ (support, referrals, trauma-informed practice)	✓ (recognition and safeguarding)
Extended Dispersal Powers (72 hours)	X	✓ (police-led enforcement)
Vehicle Seizure Without Warning	X	✓ (police-led action)
Mandatory ASB Data Sharing	✓ (contribute housing ASB data)	✓ (lead coordination and reporting)

## Background Papers

City of London Anti-Social Behaviour Policy (v.3 Approved 03/06/2024)

### Helen Chantry

Interim Head of Housing Management

E: [helen.chantry@cityoflondon.gov.uk](mailto:helen.chantry@cityoflondon.gov.uk)