

	<b>Unacceptable &amp; Anti-Social Behaviour Policy</b>
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1	Hate Crime & Harassment Policy	M Wood	Feb 22	Board	Feb 22	Feb 22	Feb 25
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## 1. Introduction

This policy seeks to set out Eldonian Community Based Housing Association's (ECBHA's) approved policy positions regarding actions, behaviours and incidents that it considers to be negative, anti-social and/or unacceptable. It also includes reference to domestic violence, which is also included within the Wellbeing and Safeguarding Policy.

This document has brought together a number of separate ones into a single document. Those previous documents and applicable content are superseded by this document.

This policy sets out how ECBHA intends to comply with the relevant legislation and regulatory requirements and guidance.

ECBHA seeks to be transparent with all stakeholders regarding its performance, compliance and assurance with this policy.

The document is relevant to all ECBHA employees, residents, contractors and other person's or other stakeholders delivering or affected by activities and ECBHA homes and services.

## **2. Policy Posisitons: Anti Social Behaviour Policy (ASB), Integrating Hate Crime & Domestic Violence.**

### **2.1 Legislative Background**

This statement is intended to be compatible with statutory provisions:

- Anti-Social Behaviour Act 2003
- Crime and Disorder Act 1998
- Equality Act 2010
- Freedom of Information Act 2000
- Homelessness Act 2002
- Housing Act 1988
- Housing Act 1996
- Human Rights Act 1998
- Protection from Harassment Act 1997
- Anti-Social Behaviour, Crime and Policing Act 2014
- General Data Protection Regulations

### **2.2 Scope**

ECBHA provides service to tenants, leaseholders, shared owners and seeks to serve the wider local community. This statement applies to all ECBHA operations, however its range of activities and interventions will vary dependent on the context of the situation and the individuals, tenures and localities involved.

### **2.3 Policy Statement - ASB**

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

*‘conduct that is capable of causing nuisance or annoyance to some person (who need not be a particular identified person) or in relation to that person’s occupation of residential premises and that directly or indirectly relates to or affects the landlord’s housing management functions; or conduct that consists of or involves using or threatening to use housing accommodation owned or managed by the landlord for an unlawful purpose’*

We consider hate crime, domestic violence and harassment to be capable of being ASB and such matters will be considered within the framework of this policy.

What does and does not amount to ASB will frequently turn on the facts of a particular case. A key determinant in deciding whether particular behaviour is anti-social or not will be the impact of the behaviour on others. Not all matters of concern may constitute ASB.

It is recognised that if left unchallenged ASB can have a very significant effect on the quality of life of individuals and groups within our communities and can impact on the welfare of communities as a whole. Addressing ASB as early as possible can prevent situations from escalating.

We expect individuals and groups to behave with respect to others and in a manner which does not interfere with the comfort or well-being of other individuals or groups in our communities. We will seek to:

- Protect our communities, prevent ASB and promote a safe living environment.
- Tackle what are often diverse and complex issues around ASB using a range of tools including prevention, support and enforcement with the objective of delivering a proportionate and flexible response to the challenges that ASB presents.
- Provide a high-quality service to tackle and resolve ASB supporting safe neighbourhoods and communities.
- Support complainants and their families and encourage reporting of issues.
- Communicate effectively with partners by sharing intelligence and where appropriate use 'joint-working' to tackle ASB.
- Work with communities and partners to find the most appropriate resolution to the issues they face so that communities feel engaged and empowered.
- Pay particular attention to protect those most vulnerable from the effects of ASB.
- Manage those who cause ASB using appropriate and proportionate intervention, rehabilitation, support and/or enforcement depending on the facts of the particular case with the aim of preventing ASB, promoting community protection and deterring and rehabilitating perpetrators.
- Help individuals and groups to reach a common understanding about what does and does not constitute ASB and how minor lifestyle differences or everyday living noise may not constitute ASB.
- Provide consistent and clear information to enable customers to understand our policies and procedures.
- Ensure that our staff are trained to manage complaints proactively

The tools and powers introduced by the Anti-Social Behaviour, Crime and Policing Act 2014 (including, but not limited to, civil injunctions, criminal behaviour orders, dispersal powers, community protection notices, public spaces protection orders, closure powers and absolute orders for possession) will form part of the policy delivery, either by ourselves and/or in conjunction with our partners, along with existing powers to recover possession of property.

We will act in appropriate cases to protect owner-occupiers or those in other tenures from the actions of our tenants, their households and/or visitors.

In appropriate cases we will take action against owner occupiers or people in other tenures to protect our tenants, their households and/or visitors.

## **2.4 Expected Standards of Behaviour**

We expect our residents to behave appropriately and in accordance with the terms of their tenancy agreements. Our tenants are not only responsible for their own conduct but are also responsible for the conduct of any person residing at or occupying their property (whether adults or children). Our tenants are also responsible for the conduct of any lawful visitor to their property, whether that visitor is an adult or a child.

## **2.5 Prioritising Victims & Witnesses**

We seek to boost the confidence of witnesses, partner agencies and the wider community in a

context where the safety and well-being of victims and witnesses is a primary consideration. Practical steps to support complainants and witnesses may include

- Being clear about how incidents of ASB may be reported and making reporting channels as simple as possible.
- Dealing with reported complaints promptly and keeping complainants and witnesses informed of relevant developments.
- Referring individuals to support services where necessary (e.g. Victim Support).
- Agreeing a realistic action plan with individuals where appropriate and communicating with them on a regular basis by an agreed method of communication throughout the investigation and any subsequent action.
- Risk assessing and using physical measures in appropriate cases to reassure complainants or witnesses (e.g. personal alarms or fireproof bags for letterboxes).
- Providing details of emergency out of hours contacts.
- Informing relevant officers such as caretakers or wardens so that they can keep a 'look out' where appropriate.
- In cases where enforcement action is taken, discussing and explaining the processes involved and supporting complainants and witnesses through the process (e.g. by providing transport to court in appropriate cases and support at court to ensure that complainants and witnesses are adequately safeguarded).
- Agreeing the provision of ongoing support and/or support referrals following the conclusion of enforcement action or other steps where appropriate.
- Liaising with the police in appropriate cases.

In extreme cases we will consider the use of professional witnesses and/or covert surveillance to gather or support evidence of ASB. Any such consideration will be based on the facts of the particular case.

## **2.6 Harassment Hate Crime**

We take harassment / hate crime in any form against any member of our community extremely seriously. Such conduct can have a very traumatic effect on the victim and a divisive effect on our communities.

Racial and other harassment and hate crime may include, but is not limited to, violence, intimidation and/or abuse towards a person or group of people (or damage to their property) because of their race, colour, ethnic or national origin, gender identity, sexual orientation, marital status, disability, age or religion.

We define hate crime as behaviour committed against a person or property which is motivated by hostility towards someone based on their race, colour, ethnic or national origin, gender identity, sexual orientation, marital status, disability, age or religion. We will look to involve our partners (e.g. local Police services) in these sorts of cases wherever appropriate.

We are committed to:

- Eliminating unlawful discrimination and harassment.
- Promoting good relations between people of different backgrounds.
- Maximising the reporting of incidents that are 'hate' motivated.
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The Equality Act 2010 is important when we seek to resolve ASB as it provides a legal framework

to protect the rights of individuals and advance equality of opportunity for all.

## **2.7 Domestic Abuse**

We want to achieve a community that does not tolerate domestic abuse and that affords effective support to all of its victims(whether adults or children) whilst at the same time holding perpetrators to account.

Domestic abuse may fall within the definition of ASB. Each case must be considered on its facts. We are mindful of the need to ensure that survivors are supported in accessing remedies specifically designed to address domestic abuse (for example non-molestation orders) whilst other enforcement tools may be used by us and/or other agencies in appropriate cases.

## **2.8 Specialist Support**

We will consider the positive impact that support might have on victims of ASB. We also consider the positive impact that support might have on perpetrators who might themselves be vulnerable.

Where appropriate we will work with partners to source appropriate specialist support providers that may assist in resolving, or reducing the causes and impact of ASB activity.

Specialist agencies may include, but are not limited to, the local community mental health team, drug action teams, local drug and/or alcohol support organisations and local mental health services.

In cases involving young perpetrators there are often, although not always, problems with their family and/or school. In such cases we will try and identify the cause or causes of the young person's ASB and we will consider involving parent(s), guardian(s) and/or school if appropriate.

We can also refer cases to the local authority family intervention support service. We look to use acceptable behaviour contracts with young perpetrators where they are likely effective.

Whether perpetrators are adults or children we look to achieve long term changes in their behaviour and seek to prevent displacement of ASB.

## **2.9 Multi-agency Partnerships**

We are committed to partnership working. We are part of the wider community and share the problems and challenges of our community. Often the causes of ASB and the solutions to ASB do not lie within the remit of a single organisation.

Partnership working is vital if we are to deal effectively with the incidence of, causes of and consequences of ASB within our communities. Working in conjunction with other agencies and organisations gives us the best chance of swiftly and robustly targeting resources effectively with the aim of preventing ASB and protecting our communities.

## **2.10 Prevention**

Prevention is an integral part of our approach to ASB. Initiatives we use or can access include:

- Regular estate inspections which enable us to identify any 'hotspot' issues / areas.

- Diversionary activities.
- Use of Acceptable Behaviour Contracts and mediation services
- Designing out crime, embracing ‘secure by design’ principles.
- Use of private security services
- Use of CCTV
- Use of our allocations policy to seek to mitigate the risk of new tenants behaving in a criminal or anti-social manner
- Use of starter tenancies
- Good neighbour agreements
- Multi-agency partnerships
- Education and raising awareness (this includes publicising cases where ASB and criminal activity have been identified and publicising campaigns to tackle behaviour)

## **2.11 Confidentiality, Data Protection and Information Exchange**

Whilst we respect privacy and confidentiality and are mindful of our legal obligations, tackling ASB requires robust information exchange between statutory and non-statutory agencies.

We will ensure we have agreed specific protocols for information sharing with agencies before sharing information where it is lawful to do in order to help us to detect and prevent ASB and to protect our communities.

Our policy is to seek permission before disclosing the identity of complainants and witnesses to perpetrators, their legal representatives or other interested parties. Where anonymous evidence may by virtue of its content necessarily reveal the identity of the maker of the statement we will discuss this with the maker of the statement.

Notwithstanding any request for anonymity, information relating to complainants and perpetrators may however have to be shared with other agencies for lawful purposes such as the purpose of preventing crime.

## **2.12 Publicity**

We will consider the use of publicity in order to pursue legitimate aims including, but not limited to, supporting and reassuring communities, informing communities of methods of reporting ASB, and informing communities of successful efforts to protect them.

When considering whether to publicise we will take account of the particular circumstances of each case and ultimately ask, in light of those circumstances, whether the proposed publicity is necessary and proportionate.

## **2.13 Protection of Staff**

We will not tolerate ASB directed towards staff or our contractors or ASB committed in the presence of our staff or contractors.

We will take a very robust approach to such incidents and will look to take enforcement action against perpetrators in such circumstances to protect our staff and contractors wherever appropriate. This may include, but is not limited to, the use of injunctions (with or without powers of arrest), possession proceedings and/or referral of conduct to the police for investigation.

## **2.14 Performance Monitoring & Review**

It is important that we carry out effective monitoring of complaints of ASB and the services we provide in an effort to protect people and prevent ASB.

Complainants and witnesses are asked to complete a satisfaction questionnaire at the end of a case and results are reviewed and analysed. Reports on feedback will be provided regularly to the Board.

## **2.15 Policy Positions - Hate Crime & Harassment**

As responsible landlord, ECBHA aims to provide appropriate support and housing management services to any customer(s) who may be at risk, has suffered or is suffering any form of harassment or hate crime / incidents.

Previously ECBHA's provisions for dealing with all forms of harassment / hate crime, anti-social behaviour and domestic abuse were contained in one Policy. In recognition that these issues will affect people differently and require a tailored response, ECBHA have now developed three separate but interlinked policy positions that should be read in conjunction with each other, as follows:

- The Anti-Social Behaviour Policy
- The Domestic Abuse Policy
- The Harassment and Hate Crime Policy

In operating this Policy, ECBHA intends to send out a clear message that it will not tolerate harassment or hate crime directed to or from any of its customers, directly employed staff or those acting on ECBHA's behalf.

When ECBHA becomes aware that harassment or hate crime has or is taking place involving any of the groups of people outlined above it will endeavour to take the most effective and expedient action to:

- Protect and support survivors and witnesses
- Stop escalation
- Where possible, ensure known perpetrators receive appropriate punitive measures

In operating this Policy, ECBHA will comply with all legal and regulatory requirements regarding harassment and hate crime / incidents, including but not exclusive of the following:

- Any requirements of revised Regulatory Standards to be adopted by the Regulator of Social Housing
- The requirements of the Equalities Act 2010
- Any breaches of the Crime and Disorder Act 1998 or Criminal Justice Act 2003 specifically in relation to behaviours directed at people related to their protected characteristics or perceived characteristics

## **2.16 Access and Communication**

ECBHA is committed to ensuring that our services are accessible to everyone. ECBHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.

In line with the Mental Capacity Act, ECBHA will assume that customers have capacity to understand information given to them. Where it is suspected that customers lack capacity to understand, PCHA will request an assessment by a professional practitioner and look to provide the appropriate support where capacity is deemed to be insufficient.

## **2.17 Equality, Diversity and Human Rights**

ECBHA is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Religion and/or Belief, Civil Partnership and Marriage, Pregnancy and Maternity.

ECBHA also recognise that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

## **2.18 Statement of Intent & Position**

In operating this Policy and the procedures that underpin it, ECBHA makes a clear statement of intent that it will adopt a zero-tolerance stance to all forms of harassment or hate crime / incidents directed to or from its customers, to or from staff or others working on ECBHA's behalf.

ECBHA will provide training for all front-line staff on understanding harassment and hate crime issues so that they may recognise and take appropriate actions when they are made aware of or witness these types of behaviour.

Through the provisions contained in this and other Policies, PCHA aims to promote cohesive and inclusive communities in the areas of its operations where there is tolerance and good relations between people regardless of their protected characteristics.

Through direct means, through sign-posting and close collaborative working with partner agencies PCHA will aim to provide support for its customers or staff that are survivors of harassment and hate crime / incidents.

Where possible, i.e. there is strong evidence that individuals are responsible for perpetrating acts of harassment or hate crime / incidents against ECBHA customers or staff (or where customers or staff are found to be responsible for these types of behaviour) ECBHA will take appropriate enforcement actions.

This may include tenancy enforcement measures available to ECBHA as a landlord, civil actions, other legal remedies. Any ECBHA employee that is found to be responsible for this type of



behaviour or actions will be subject to disciplinary procedures.

ECBHA will raise awareness of harassment and hate crime issues through information available via its website and by taking part in national campaigns such as 'Hate Crime Awareness Week'.

Through active participation in multi-agency forums within areas of operation, ECBHA will maintain strategic influence over the local provisions for dealing with harassment and hate crime issues and will look to provide a coordinated response with other agencies on cases involving ECBHA customers.

In line with the Equality Act 2010, ECBHA will define 'harassment' as any type of behaviour or act that has the effect of or is meant to:

- Violate another person's dignity
- Creates an intimidating, hostile, degrading or offensive environment

The above definitions may apply to any person or group of people, regardless of protected characteristics e.g. could relate to behaviour or acts directed at individuals because of their age and does not necessarily have to be proven as a criminal act.

Similarly, ECBHA adopts a wider definition of 'Hate Crime' other than those where a criminal act has been committed / proven and instead will take action on 'hate incidents' where the survivor perceives that an act or behaviour has been motivated by hostility or prejudice based on:

- Disability
- Race
- Religion
- Transgender identity / expression
- Sexual orientation
- Gender
- Age

Both harassment and hate crime / incidents can take many forms and can occur in a variety of settings and are often interchangeable i.e. hate crime / incidents are also likely to involve an element of harassment. For both issues covered by this Policy a non-exhaustive list of examples, where ECBHA will take action, includes:

- Verbal abuse like name-calling and offensive jokes
- Bullying or intimidation
- Physical attacks such as hitting, punching, pushing, spitting
- Threats of violence
- Hoax calls, abusive phone or text messages, hate mail •
- Online abuse on social media platforms – (providing advice only to contact the Police or block communications under the provisions contained in the Malicious Communications Act 1988 but not investigating personal communications)
- Displaying or circulating discriminatory literature or posters

- Harm or damage to property, pet, vehicle
- Graffiti
- Arson
- Malicious complaints

## **2.19 Reporting Harassment and Hate Crime / Incidents**

ECBHA will ensure there are numerous and accessible means by which customers can report harassment or hate crime / incidents including via:

- In-person contact with any directly employed employee during the course of their duties
- Telephone
- Email
- Customer Portal

ECBHA will receive calls and alerts of harassment or hate crime incidents direct from those customers that may be experiencing these types of behaviours but also from third parties who may be aware or have witnessed this type of behaviour / incident.

ECBHA Where reports are received from third parties on behalf of others (who are ECBHA customers) due to Data Protection and privacy issues it is highly unlikely that ECBHA will be able to provide feedback on follow-up actions to the person(s) raising the concerns. In these circumstances ECBHA will endeavour to make contact with the ECBHA customer(s) and will make discreet enquiries to confirm if the concerns are genuine and if any on-going support / action is required.

## **3. Policy Positions - Unacceptable and Unreasonable Behaviour**

### **3.1 Purpose of this Policy**

This policy sets out ECBHA's approach to managing behaviours or actions that are considered unacceptable and are having a harmful impact on ECBHA colleagues and / or on their ability to provide a consistent level of service to other customers.

### **3.2 Definitions**

**Unacceptable behaviour** ECBHA understands that customers may act out of character in times of distress or due to frustration. However, if that frustration becomes aggression or abuse towards staff, it will not be tolerated.

Staff have the right to undertake their work free from aggression or abuse and customers are expected to treat them with courtesy and respect. Aggressive or abusive behaviour may include:

- threats of or actual physical harm
- behaviour or language (verbal or written) that may cause staff to feel offended, afraid,

- threatened or abused
- insulting or degrading language
- personal grudges toward certain staff
- making serious allegations against staff without any evidence

### **3.3 Unreasonable demands**

A demand may be unreasonable if handling it could take up an excessive amount of staff time and prevent them from handling other customer enquiries within agreed timescales. Unreasonable demands may include:

- demanding responses within an unrealistic timescale
- insisting on seeing or speaking to someone more senior or a particular member of staff when that is not possible
- regularly changing what the complaint is about
- regularly raising new or unrelated concerns
- refusing to accept a decision following a full investigation
- making repeated contacts about the same issues even though a response has already been provided

### **3.4 Harassment**

Staff have the right to carry out their duties free from harassment or threats of harassment. All customers are asked to respect that staff are delivering services and decisions on behalf of ECBHA and therefore this may not reflect their own views or preferences. Examples of harassment may include:

- recording staff without consent
- publishing information online such as through any social media channel, that is deemed to be unacceptable
- contacting staff using their personal details or social media presence such as Facebook, Twitter, or LinkedIn.
- publishing personal, sensitive, or private information about staff online or other public domains such as noticeboards or newsletters.

### **3.5 Unreasonable frequency or duration of contact**

The number of times a customer may contact ECBHA, or the duration of each contact, can cause problems for staff.

Customers may make what are considered unreasonable demands on our staff through the amount of information they seek, the nature and scale of service they expect or the number of approaches they made. What amounts to unreasonable demands will be dependent on the circumstances surrounding the behaviour and the seriousness of the issues raised by the customer.

Sometimes the volume and duration of contacts by an individual can cause's problems. This can occur over a short period, for example, multiple calls or emails in one day or in one hour. It can also occur over a longer period with regular long telephone calls or inundating the office with copies of information already submitted or irrelevant to the issue. Examples of unreasonable levels of contact include:

- making multiple unnecessary calls in one day
- persistent emails about the same issue or repeatedly sending emails with large amount of information attached that is not required when a matter is closed
- sending new complaints before there has been an opportunity to address earlier/existing complaints
- repeatedly asking staff to look at the same issue when it has already been addressed through the complaints process
- repeatedly making very long calls

### **3.6 How ECBHA manage unacceptable and unreasonable demands**

If ECBHA feel the behaviour is unacceptable or unreasonable, any of the following actions may be taken:

- Staff may either place a caller on hold or end the telephone call if the caller is aggressive, offensive, or abusive, or is making unreasonable demands
- warning the customer about their behaviour and requesting that the customer modifies their future behaviour
- contact on the matter is restricted or ended
- contact is restricted on all matters
- ask that all future contact is made through a third-party such as a family member
- contact will be restricted to emergency contact only and all other correspondence should be in writing
- incidents may be reported to the police (for example, if violence has been threatened)
- take any other action that is considered appropriate (in extreme cases, this may include injunctions and seeking possession of a customer's tenancy)
- other tenancy enforcement action

Where staff are considering any of the above actions or have had to take immediate action (for example, end a phone call), this will be discussed with a Line Manager, who will then consider with staff which action is appropriate (if any).

Customers will be informed about the action ECBHA is taking and the reason for it. This may include how long restrictions will be in place.

In deciding the action, the following will be considered:

- how it affects staff
- how it affects the customer (including a customer's personal circumstances and any reasonable adjustments)
- the extent to which the complaint or enquiry has been exhausted

In instances where a customer's behaviour is classed as unacceptable or unreasonable, the details will be recorded.

The customer's details and the reasons why their behaviour has been classed as unacceptable will be provided to all relevant ECBHA staff and a warning marker will be placed on the housing management system to alert staff to the behaviour.

The customer will be informed of the restriction by letter.

This process may be reconsidered if the customer commits to behaving with courtesy, respect,

and fairness and:

- some time has passed
- there is a more suitable alternative course of action available
- ECBHA receive evidence that there were exceptional reasons for the behaviour

### **3.7 Appeal Process**

Customers will be able to appeal any formal restrictions of contact within 28 days of being informed of the restriction being implemented. The customer appealing the decision to restrict contact should make the request via email or letter, setting out the reasons why they feel the action is unfair.

A senior manager who was not involved in the original decision will consider the appeal subject to any pending or over-riding legal action. Their decision whether to remove; amend or to continue with the restriction will be made within 21 days of receiving the request for a review of the decision.

The decision made by the Senior Manager considering the appeal is final and cannot be appealed against. In cases where the resident is still dissatisfied, it is for the Housing Ombudsman to consider and review the case.

### **3.8 Legislative or other Guidelines**

This policy is guided by the approach of the Housing Ombudsman Service – Our Approach to Unacceptable Behaviour.

The ‘Regulatory Framework for Social Housing in England’ sets out that Registered Providers shall:

‘Have an approach to complaints that is clear, simple and accessible and that ensures complaints are resolved promptly, politely and fairly’. The Policy is designed to allow complaints to be investigated whilst providing tools to manage situations where customers exhibit unreasonable behaviours.

‘...accept complaints made by advocates authorised to act on a customer’s behalf’. The Policy contains provisions that encourage customers to use an advocacy service where they are unable to present their issues clearly or where they are exhibiting unreasonable behaviours.

### **3.9 Links to the ECBHA Corporate Plan**

The Policy operates alongside the Customer Complaints and Feedback Policy, which provides a framework for dealing with complaints.

ECBHA will record, monitor and report on the following KPIs in relation to this Policy:

The number of reports of unacceptable behaviour  
The number of reports of unreasonable demands  
The Number of sanctions in place  
The number of court actions

#### **4. Equality, Diversity, and Inclusion**

We are committed to promoting equal opportunities for all everyone will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation.

This policy supports ECBHA commitment to treat all people with fairness and respect. We aim to foster good relations within our communities. When applying this policy, we will act sensitively towards the diverse needs of individuals and to reduce discrimination and harassment.

We will be inclusive and help ensure representation of diversity in our communities in our imagery and content.

#### **5. Monitoring and Review**

This policy will be reviewed every three years unless changing circumstances or an incident trigger an earlier review.