

Customer Access Review – Full Assessment

APPENDIX B

Assessment details	
Assessment area	Anti-Social Behaviour Policy
Date of assessment	17 February 2021
Directorate and Service	Strategic Directorate (External Services), Housing Services
Manager	Housing Manager
Officer conducting assessment	Housing Policy & Development Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	<p>The Anti-social Behaviour Policy outlines Dartford Borough Council’s approach to tackling anti-social behaviour. This assessment has been undertaken in conjunction with a review of the existing Policy.</p> <p>The Policy outlines the overall approach the Council takes towards tackling anti-social behaviour, incorporating the roles of the three main service areas that deal with anti-social behaviour (Community Safety Unit, Housing Services and Environmental Health).</p> <p>The overall objective of the Policy is to prevent and minimise instances of anti-social behaviour and to resolve them as early as possible through timely, appropriate and proportionate intervention. To achieve this, the Council aims to:</p> <ul style="list-style-type: none"> • Provide an accessible, effective service, which encourages residents to report incidents and communicates effectively with all parties; • Develop community safety strategies to prevent anti-social behaviour and take firm action against perpetrators; • Understand the risk and the impact of harm to victims, enabling the appropriate and necessary action to be taken; • Protect and support victims and witnesses, complying with procedures on confidentiality at all times; • Ensure support is available to vulnerable victims as well as to vulnerable perpetrators to tackle the root causes of the anti-social behaviour; • Treat people fairly and equally, ensuring that any action taken is proportionate and reasonable in the circumstances; • Tackle inequality and discrimination; • Work in partnership with tenants, residents and others agencies to provide an effective response.

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Step 1: Scoping the assessment	
<p>2. Who will be affected by the activity or proposal?</p>	<p>The Policy will affect all Dartford Borough Council tenants and residents.</p>
<p>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</p>	<p>a) Corporate Plan 2017-20 performance indicators:</p> <ul style="list-style-type: none"> • Number of Community Protection Notices issued • Number of Public Space Protection Order Enforcement Notices issued <p>b) The Anti-social Behaviour Policy contributes to the Corporate Plan Safer Communities strategic aim to ‘create a safer borough in which to live, work and socialise’ and the strategic objective to ‘reduce anti-social behaviour’. The Policy also contributes to the Housing and Stronger Communities strategic aims of ‘facilitating quality, choice and diversity in the housing market, and delivering high quality services to service users’; and ‘creating strong and self-reliant communities’.</p>
<p>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p>The Crime and Disorder Act 1998 requires the Council to work together with the Police and other agencies to develop and implement strategies to reduce crime, disorder and anti-social behaviour. The Council has a range of additional powers to take action against those causing anti-social behaviour under the Anti-Social Behaviour, Crime and Policing Act 2014.</p> <p>The Council has a duty, under the Anti-Social Behaviour Act 2003, to respond to anti-social behaviour affecting the properties it manages. The Policy fulfils the duty for the Council as a social landlord to publish an anti-social behaviour policy and procedures statement in accordance with the Housing Act 1996 (as amended).</p> <p>The Council has a duty under the Environmental Protection Act 1990 to investigate complaints that could be a ‘statutory nuisance’ and to take action where the Council is satisfied there is a statutory nuisance.</p> <p>The Policy and its delivery is intended to be compatible with the Council’s obligations consequent to all relevant legislation, protocols and statutory guidance including, but not limited to:</p> <ul style="list-style-type: none"> • Crime and Disorder Act 1998 • Anti-Social Behaviour, Crime and Policing Act 2014 and the Anti-social Behaviour, Crime and Policing Act 2014: Anti-social behaviour statutory guidance for frontline professionals • Anti-Social Behaviour Act 2003 • Housing Act 1985 • Housing Act 1996

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Step 1: Scoping the assessment	
	<ul style="list-style-type: none"> • Housing Act 2004 • Environmental Protection Act 1990 • Localism Act 2011 • Control of Pollution Act 1974 • Refuse Disposal (Amenity) Act 1978 • Criminal Procedure and Investigations Act 1996 • Town and Country Planning Act 1990 • Regulation of Investigatory Powers Act 2000 • Dangerous Dogs Act 1991 • Clean Neighbourhoods and Environment Act 2005 • Protection of Freedoms Act 2012 • Care Act 2014 • Children Act 1989 • Children Act 2004 • Mental Capacity Act 2005 • Human Rights Act 1998 • Protection from Harassment Act 1997 • Data Protection Act 2018 • UK GDPR • Race Relations (Amendment Act) 2000 • Equality Act 2010 • Homelessness Reduction Act 2017 • Coronavirus Act 2020 • Statutory Code of Practice on Racial Equality in Housing • Pre-Action Protocol for Possession Claims by Social Landlords <p>Discretion is exercised in many of the powers and tools that the Council can choose to use to tackle anti-social behaviour. The Council’s response to reports of anti-social behaviour will be based upon what is considered to be proportionate and appropriate in all the circumstances. Action taken by Officers will be specific to each situation based on the circumstances. Whilst many of the enforcement powers and tools are discretionary, the procedures for using them are largely prescribed by legislation, statutory guidance and court procedures.</p>

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Step 2: Information collection	
<p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p><u>POPULATION PROFILE – DARTFORD</u></p> <p>(Sources: Mid-Year Population Estimate, 2011 Census, Vital Statistics – ONS)</p> <ul style="list-style-type: none"> • Population – Dartford’s population is 112,600. • Gender – There are slightly more female residents than male residents in Dartford, where 50.7% people are female and 49.3% people are male. • Age – The mean age in Dartford is 37.57 years, which is slightly lower than the overall Kent mean age of 41.42 years. • Ethnicity – The largest ethnic group in Dartford is White (87.4%) whilst the remaining 12.6% of Dartford’s residents are from a Black Minority Ethnic (BME) group made up of four broad groups (Asian/Asian British; Black/African/Caribbean/Black British; Mixed/Multiple Ethnic Group and Other Ethnic Group). The Asian/Asian British group is the largest BME group in Dartford (6.0%). • Disability – 15.1% of Dartford residents consider themselves to have a long-term health problem or disability which limits their day-to-day activities. • Religion or belief – Almost three quarters of Dartford residents follow a religion. Christianity is the largest religion (60.64%) followed by the Muslim religion (1.61%). 27.20% of residents have no religion and 6.56% did not state a religion. • Sexual orientation – 0.2% of Dartford’s residents are in a registered same-sex civil partnership. • Gender reassignment – At present there is no single source of data that provides a measure of the number of people who are going through or have gone through gender reassignment. • Pregnancy and maternity – In 2018, there were a total of 1,668 births in Dartford. This is 15.2 births per 1,000 population of all ages. <p><u>HOUSING SERVICES – PROFILE OF TENANTS</u></p> <p>The Council provides accommodation for 3,750 tenants in general needs accommodation and housing scheme accommodation for older people in 11 schemes supporting 445 tenants. Information in relation to the protected characteristics of tenants is captured by the service, as follows:</p> <ul style="list-style-type: none"> • Gender – 65% tenants are female and 35% tenants are male. • Age – 6.45% of tenants are aged up to 35 years; 35.44% are aged 35 to 55 years; 34.40% are aged 55 to 75 years; and 13.71% are aged 75 years plus.

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Step 2: Information collection																											
	<ul style="list-style-type: none"> • Ethnicity – 61% of tenants are from a White ethnic group and 19% are from a Black Minority Ethnic (BME) group. The ethnic group of 20% of tenants is unknown. The Other ethnic group is the largest BME group with 11.89% tenants, the majority of which are within the European Non Irish group. • Disability – 19.95% of tenants have a disability and 80.05% do not have a disability. <p><u>HOUSING SERVICES – ANTI-SOCIAL BEHAVIOUR CASE LOAD</u></p> <ul style="list-style-type: none"> • 2020/21 – 242 cases of anti-social behaviour (up to 26 January 2021) • 2019/20 – 307 cases of anti-social behaviour <p><u>COMMUNITY SAFETY UNIT – ANTI-SOCIAL BEHAVIOUR CASE LOAD</u></p> <ul style="list-style-type: none"> • 2020 – 199 cases of anti-social behaviour • 2019 – 207 cases of anti-social behaviour <p><u>ASB REVIEWS (COMMUNITY TRIGGER)</u></p> <table border="1" data-bbox="658 810 2105 1173"> <thead> <tr> <th>Year</th> <th>No. of Community Trigger applications received by the CSP</th> <th>No. of Community Trigger applications meeting the threshold</th> </tr> </thead> <tbody> <tr> <td>20 October 2014 – 31 March 2015</td> <td>0</td> <td>n/a</td> </tr> <tr> <td>1 April 2015 – 31 March 2016</td> <td>0</td> <td>n/a</td> </tr> <tr> <td>1 April 2016 – 31 March 2017</td> <td>0</td> <td>n/a</td> </tr> <tr> <td>1 April 2017 – 31 March 2018</td> <td>2</td> <td>1</td> </tr> <tr> <td>1 April 2018 – 31 March 2019</td> <td>0</td> <td>n/a</td> </tr> <tr> <td>1 April 2019 – 31 March 2020</td> <td>5</td> <td>2</td> </tr> <tr> <td>1 April 2020</td> <td>4</td> <td>3</td> </tr> </tbody> </table>			Year	No. of Community Trigger applications received by the CSP	No. of Community Trigger applications meeting the threshold	20 October 2014 – 31 March 2015	0	n/a	1 April 2015 – 31 March 2016	0	n/a	1 April 2016 – 31 March 2017	0	n/a	1 April 2017 – 31 March 2018	2	1	1 April 2018 – 31 March 2019	0	n/a	1 April 2019 – 31 March 2020	5	2	1 April 2020	4	3
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<p>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</p>	<p>Internal consultation on the draft updated Policy has been undertaken.</p> <p>Comments on the draft updated Policy were invited from the Kent Tenancy Management Sub Group of the Kent Housing Group. This group includes representation from across the local authority and housing association membership. The group considers best practice, problem solving and producing strategic and</p>																										

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Step 2: Information collection	
	<p>operations documents to ensure high quality consistent approaches to all elements of housing management for the residents of Kent.</p> <p>The Dartford Tenants' and Leaseholders' Forum were also invited to comment on the draft updated Policy. The Forum aims 'to ensure that the services delivered by the Council are accessible to all'. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery.</p> <p>There were no equality issues raised regarding the draft Policy from the consultations.</p>
<p>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</p>	<p>Information gaps – Housing Service</p> <p>The ethnicity data of 20% of Council tenants is unknown.</p> <p>The Housing Service monitors the vulnerability of tenants affected by anti-social behaviour as part of the case management process (e.g. vulnerability due to age, disability and mental health etc). However, the amount of information regarding the protected characteristics of council tenants by gender reassignment, religion/belief and sexual orientation is limited.</p> <p>The Housing Service does not currently collect data from council tenants regarding the satisfaction with the handling of anti-social behaviour. However, the draft Policy includes a commitment to start collecting satisfaction data on case closure.</p> <p>Combined with improved equality monitoring of council tenants affected by anti-social behaviour by protected characteristic group and the collection of satisfaction data, will enable the Housing Service to improve the monitoring of performance; identify trends and patterns; identify further equality impacts – which will assist in the informing of future policy and service developments.</p>
Step 3: Assessing the equality impact	
<p>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</p> <ul style="list-style-type: none"> a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations 	

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Step 2: Information collection

NOTES:

- The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration
- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
<p>Age</p>	<p>Children and young people - Section 12 of the Policy sets out the approach for when children and young people are affected by anti-social behaviour. Where the alleged perpetrators of anti-social behaviour are children or young people, the Council will involve parents and guardians to help resolve the problem, and may also liaise with other agencies. This may include Children's Social Work Services (to ensure any necessary child in need assessments are carried out), Schools, Youth Offending Teams, Early Help and Preventative Services (for Early Help and/or under the Troubled Families Programme) and any other relevant agencies.</p> <p>Legal action against children and young people will only be taken after consultation with the Youth Offending Team.</p> <p>Where it is believed that any child is at risk of significant harm due to anti-social behaviour, a</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>child protection referral will be made to Children’s Social Work Services to protect the child from harm.</p> <p>Older vulnerable adults - Section 13 of the Policy sets out the approach for protecting and supporting vulnerable victims and perpetrators of anti-social behaviour.</p> <p>Older adults may feel particularly vulnerable, intimidated and fearful of certain anti-social conduct. An assessment is carried out to determine if the victim and/or perpetrator is vulnerable due to age. For council tenants, a person’s vulnerability is determined at the point of access to their tenancy, where a record is kept on their tenancy file including details of any involved support services. Vulnerability may also be determined during the course of the tenancy as tenants’ circumstances can change.</p> <p>Referrals will be made to support services for vulnerable victims of anti-social behaviour.</p> <p>Additional contact, including home visits will be made to vulnerable council tenants, including tenants in housing schemes, affected by anti-social behaviour to provide reassurance and support.</p>			

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>Where it is believed a vulnerable adult has care and support needs and is experiencing or at risk of abuse due to anti-social behaviour or forms of violence or discrimination, a referral will be made to Adult Social Services to protect the adult from harm.</p> <p>The Council will liaise with the vulnerable perpetrators' support networks or connect them to support services if they are not already engaged.</p> <p>It is recognised that following the usual procedure for vulnerable perpetrators of anti-social behaviour through enforcement measures is not always appropriate. The Council will have regard to the particular circumstances and the vulnerability of perpetrators when considering the most appropriate form of intervention and action. Therefore, before considering enforcement action, additional steps will be taken wherever possible to work with the vulnerable perpetrator to tackle the root causes of the behaviour. Although, there are some circumstances where the Council may have an overriding duty to take action, for example, where a statutory nuisance has been caused.</p> <p>For council tenants at risk of possession proceedings due to anti-social behaviour, if the</p>			

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>Council is aware that the tenant is particularly vulnerable, it will consider at an early stage: whether or not the tenant has the mental capacity to defend possession proceedings and the extent to which CPR 21 applies; whether or not any issues arise under the Equality Act 2010; and whether or not there is a need for a community care assessment in accordance with the Care Act 2014.</p>			
Disability	<p>Vulnerable disabled adults - Section 13 of the Policy sets out the approach for protecting and supporting vulnerable victims and perpetrators of anti-social behaviour. An assessment is carried out to determine if the victim and/or alleged perpetrator is vulnerable due to disability. For council tenants, a person's vulnerability is determined at the point of access to their tenancy, where a record is kept on their tenancy file including details of any involved support services. Vulnerability may also be determined during the course of the tenancy as tenants' circumstances can change.</p> <p>Referrals will be made to support services for vulnerable victims of anti-social behaviour.</p> <p>Additional contact, including home visits will be made to vulnerable council tenants, including tenants in housing schemes, affected by anti-</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>social behaviour to provide reassurance and support.</p> <p>Where it is believed a vulnerable disabled person has care and support needs and is experiencing or at risk of abuse due to anti-social behaviour or forms of violence or discrimination, a referral will be made to Adult Social Services to protect the adult from harm.</p> <p>The Council will liaise with the vulnerable perpetrators' support networks or connect them to support services if they are not already engaged.</p> <p>It is recognised that following the usual procedure for vulnerable perpetrators of anti-social behaviour through enforcement measures is not always appropriate. The Council will have regard to the particular circumstances and the vulnerability of perpetrators when considering the most appropriate form of intervention and action. Therefore, before considering enforcement action, additional steps will be taken to work wherever possible with the vulnerable perpetrator to tackle the root causes of the behaviour. Although, there are some circumstances where the Council may have an overriding duty to take action, for example, where a statutory nuisance has been caused.</p>			

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>For council tenants at risk of possession proceedings due to anti-social behaviour, if the Council is aware that the tenant is particularly vulnerable, it will consider at an early stage: whether or not the tenant has the mental capacity to defend possession proceedings and the extent to which CPR 21 applies; whether or not any issues arise under the Equality Act 2010; and whether or not there is a need for a community care assessment in accordance with the Care Act 2014.</p> <p>Some victims of anti-social behaviour may have a reduced level of mental wellbeing generally as a result of issues of anti-social behaviour that they are suffering. There is also a link between mental health problems and substance misuse with some perpetrators. The Policy therefore explains that referrals are made, where appropriate, to Mental Health and Substance Misuse Services for both victims and perpetrators.</p> <p>Hate crime - Some groups of people may be affected by behaviour motivated by hate, where the perpetrator's hostility or prejudice against an identifiable group of people is a factor in determining who is victimised. Section 9 of the Policy sets out that if the incident is a hate crime motivated by hostility or prejudice based</p>			

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>on a person’s disability or perceived disability, then the report will be categorised as high priority and contact will be made with the victim within 48 hours.</p> <p>Information in alternative formats - Section 11 of the Policy explains that, in accordance with the Council’s Equality & Diversity Document Framework, information about the services provided to resolve anti-social behaviour can be provided in alternative formats to people with sensory needs including:</p> <ul style="list-style-type: none"> • Braille, audio tape and large print versions of documents • British Sign Language interpreting <p>Calls can be received via Relay UK.</p>			
Sex	<p>Domestic abuse - Domestic abuse can be violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexual orientation. Section 9 of the Policy sets out that domestic abuse incidents will be categorised as high priority and contact will be made with the victim within 48 hours.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<p>Hate crime - Some groups of people may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice against an identifiable group of people is a factor in</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	determining who is victimised. Section 9 of the Policy sets out that if the incident is a hate crime motivated by hostility or prejudice towards a person who is transgender or perceived to be transgender, the report will be categorised as high priority and contact will be made with the victim within 48 hours.			
Race	<p>Hate crime - Some groups of people may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice against an identifiable group of people is a factor in determining who is victimised. Section 9 of the Policy sets out that if the incident is a hate crime motivated by hostility or prejudice based on a person’s race or perceived race, then the case will be high priority and contact will be made with the victim within 48 hours.</p> <p>Information in alternative formats - Section 11 of the Policy explains that, in accordance with the Council’s Equality & Diversity Document Framework, information about the services provided to resolve anti-social behaviour can be provided in alternative formats to people where English is not their first language including:</p> <ul style="list-style-type: none"> • Documents translated into other languages • Telephone and face-to-face language interpreting 		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Religion/Belief	<p>Hate crime - Some groups of people may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice against an identifiable group of people is a factor in determining who is victimised. Section 9 of the Policy sets out that if the incident is a hate crime motivated by hostility or prejudice based on a person’s religion or perceived religion, then the case will be high priority and contact will be made with the victim within 48 hours.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<p>Hate crime - Some groups of people may be affected by behaviour motivated by hate, where the perpetrator’s hostility or prejudice against an identifiable group of people is a factor in determining who is victimised. Section 9 of the Policy sets out that if the incident is a hate crime motivated by hostility or prejudice based on a person’s sexual orientation or perceived sexual orientation, then the case will be high priority and contact will be made with the victim within 48 hours.</p> <p>Domestic abuse - Domestic abuse can be violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexual orientation. Section 9 of the Policy sets out that domestic abuse incidents will be categorised as high priority and contact will be made with the victim within 48 hours.</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Pregnancy/Maternity	Anti-social behaviour can affect any person regardless of pregnancy and maternity. The activities contained in the Policy cover all persons irrespective of protected characteristic group in terms of victims and perpetrators, therefore access to and delivery of the service is not affected by pregnancy and maternity.		<input type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership*			<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	Marriage and civil partnership - This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment. However, anti-social behaviour can affect any person regardless of marriage and civil partnership. The activities contained in the Policy cover all persons irrespective of protected characteristic group in terms of victims and perpetrators, therefore access to and delivery of the service is not affected by marriage and civil partnership.
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	<p>The Council works in partnership with various internal departments, statutory agencies and voluntary third sector agencies to maximise the support available to victims and perpetrators of anti-social behaviour. The Council also facilitates or engages with various multi-agency partnerships to tackle anti-social behaviour (as outlined in Section 5 of the Policy).</p> <p>There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups other than to positively resolve problems. Effective communication with partnerships will ensure the correct support is provided through information sharing.</p>

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Step 3: Assessing the equality impact					
11. Any other comments		<p>Proportionality test - If the Council is considering issuing possession proceedings regarding a council tenancy, a proportionality test will be carried out to ensure that in cases where human rights, public law or equality law matters are or may be raised, the necessary information is before the court at the first hearing so that issues of proportionality may be dealt with summarily, if appropriate, or that appropriate directions for trial may be given.</p> <p>ASB Case Review (Community Trigger) - The ASB Case Review process, more commonly known as the 'Community Trigger', gives victims the right to request a review of their case. The Community Trigger can be used if; at least three incidents of anti-social behaviour have been reported to a relevant organisation, i.e. the Police, the Council or housing provider, within the previous six months and it is felt no action has been taken.</p> <p>Complaints process - Any person who is not satisfied with the service they have received regarding the management of an anti-social behaviour case or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints process.</p>			
Step 4: Action plan					
12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:					
<p>a) any gaps in information and consultation</p> <p>b) how any negative impacts on equality will be mitigated or eradicated</p>					
a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?					
Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
The ethnicity data of 20% of council tenants is unknown. There is also limited information on the protected characteristic groups of gender	Improve information collection e.g. in housing applications, tenancy sign-ups, tenancy verification checks etc	Improved information will better inform the impact of the Anti-Social Behaviour Policy	Ongoing	Through further Customer Access Review assessments	Housing Manager

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
reassignment, religion/belief and sexual orientation					
The Housing Service does not currently collect data from council tenants regarding the satisfaction with the handling of anti-social behaviour, although this is a commitment in the draft updated Policy	Collect tenant satisfaction data regarding satisfaction with the handling of anti-social behaviour	Collection of satisfaction data will enable the ability to monitor performance, identify any further equality impacts and improve the service	April 2021	Through further Customer Access Review assessments	Housing Manager

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

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					

Step 5: Decision making and future monitoring

13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Strategic Director (External Services)
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	Anti-social behaviour cases are monitored on a regular basis and the Council uses a number of indicators to measure anti-social behaviour (as outlined in Step 1, Question 3 above). The actions outlined in Step 4, Question 12 will improve the monitoring of the impact of the Policy by the Housing Service on the affected protected characteristic groups.

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Step 5: Decision making and future monitoring	
16. When will you review this Customer Access Review?	The Policy will be initially reviewed after one year. If there are any significant changes to the Policy, this Customer Access Review will be reassessed at the same time. The Policy and Customer Access Review will then be reviewed every three years.

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