

<u>Title</u>	Hate Crime & Incidents Policy						
Version number	1.0						
Document Type	Policy	X	Procedure		Terms of Reference		
	Strategy		Print Media		Report		
Scope	Local		Regional		Association Wide	х	
Original policy date	September 2025						
Reviewing Committee	SLT						
Approving Committee	Operations Committee						
Approval Date	December 2025						
Next review date	December 2028						
Originating Department (where applicable)	Housing Management						
Document Owner	Pauline Gooden – Head of Housing						
Lead Director or Associate Director	Ged Riley – Executive Director Housing and Support						
Status	Approved						
Keywords	Harassment, intimidation, crime, Anti-Social Behaviour, threats, violence to residents, harassment, racially aggravated harassment, property damage						

Version	Description of Amendments/Revisions	Date
1.0	Original	September 2025

The online version is the only version that is maintained and valid. If this document has been printed or saved to another location, the reader must check that the version number matches that of the online version.



Contents

PUR	POSE	. 3
1	POLICY STATEMENT	. 3
2	POLICY SCOPE	. 3
3	ASSOCIATED LEGAL & REGULATORY FRAMEWORKS	. 4
4	PRINCIPLES	. 4
5	OUR DEFINITION	. 4
6	PREVENTION, DETERRENCE AND AWARENESS	. 5
7	REPORTING HATE INCIDENTS	. 5
A	ccessibility	5
Tł	nird Party Reporting	6
8	RISK AND PRIORITISATION	. 6
9.	TOOLS AND POWERS	. 6
10.	PARTNERSHIP WORKING	. 6
11.	SUPPORT	. 7
Vi	ictims	7
Tł	nose Causing the Harm	7
12.	TRAINING AND DEVELOPMENT	. 7
13.	CUSTOMER ENGAGEMENT AND FEEDBACK	. 8
14.	REVIEW OF THIS POLICY	. 8
15.	EQUALITY, DIVERSITY & INCLUSION	. 8
16.	DATA PROTECTION	. 8



PURPOSE

This Policy sets out **Adullam Homes Housing Association (AHHA)** approach to deterring and tackling hate crime and incidents within our communities. It is aligned with relevant legal and regulatory requirements and reflects our strong commitment to identifying, preventing, and responding effectively to hate crimes and hate incidents within our communities.

1 **POLICY STATEMENT**

- 1.1 We recognise the debilitating impact that hate crimes and incidents can have, not only on an individual's health and well-being, but also on families and the wider community. Our communities are diverse, providing housing for people from a range of backgrounds, experiences and needs. We are committed to fostering inclusive, welcoming environments where residents value and embrace the benefits of equality, diversity, and inclusion. Accordingly, we are responsive to the specific strengths, assets, needs, and concerns of all our Tenant, Resident and Service Users (TRS). We are committed to actively listening to and addressing the evolving needs, concerns, and experiences of all our TRS. No one should live in fear or feel unsafe in their home or surroundings.
- 1.2 Hate incidents and crimes also constitute serious ASB. While all ASB has an impact on residents, behaviour motivated by prejudice or hostility is particularly harmful as it strikes at the core of a person's identity. This impact is often intensified for individuals with multiple protected characteristics, whose experiences and support needs are shaped by intersecting aspects of their identity.
- 1.3 We recognise that hate incidents are significantly under-reported, and that victims are often particularly vulnerable. Many may require tailored communication, reassurance, and access to specialist support. As a housing provider, we have a vital role to play in preventing, identifying, reporting, and recording hate-related ASB. We are therefore committed to raising awareness across our communities, encouraging reporting, and taking appropriate, proportionate action to support those affected.

2 POLICY SCOPE

- 2.1 This policy should be read in conjunction with our ASB Policy and Procedures. The ASB policy outlines the full range of actions, options, and processes to be followed in managing all ASB cases, including hate incidents. This policy provides additional considerations, principles, and actions that apply specifically to hate-related incidents and should be used to inform responses in such cases.
- 2.2 This policy is not limited to the management of individual cases, it also reflects our wider commitment to preventing hate crime, raising awareness, and promoting inclusive and respectful communities. Through this approach, we aim to strengthen community cohesion across all of our housing projects / locations.
- 2.3 This policy applies to all customers living in our homes, including:
 - a) General needs accommodation
 - b) Supported housing
 - c) Properties occupied under licence agreements



- 2.4 The policy also extends to individuals who are not our customers but whose behaviour negatively impacts our housing management function. For example, behaviour that affects the safety, wellbeing, or peace of our TRS, or disrupts the ability of our staff and contractors to deliver services effectively.
- 2.5 We can open and manage hate-related ASB cases where the behaviour is housing-related. This includes incidents involving or committed by our TRS, or where the behaviour of a non-customer impacts on our customers, staff, or contractors.
- 2.6 AHHA will investigate any allegations or suspected hate incidents by AHHA employees through our internal disciplinary procedures where appropriate.

3 ASSOCIATED LEGAL & REGULATORY FRAMEWORKS

3.1 This policy aligns with the legislative, regulations and internal policies as set out in our ASB Policy.

4 PRINCIPLES

- 4.1 Our approach to hate incidents is underpinned by the following:
 - a) We recognise the serious and often long-lasting impact of hate incidents on individuals, families, and communities, including its potential to escalate tensions and undermine community cohesion. We are committed to creating safer, inclusive environments that promote equality, diversity, and inclusion (EDI).
 - b) We raise awareness of what constitutes hate incidents, how to report them, and the actions we take by providing clear information accessible to everyone in our communities.
 - c) We take a victim-centred approach, responding to reports of hate in a confidential, serious, and sensitive manner. Where a victim (or other person) perceives that an incident was motivated by hate, we will treat it as such unless proven otherwise or deemed wholly unreasonable.
 - d) Recognising that hate incidents are rooted in prejudice, we do not tolerate such behaviour. We aim to act swiftly and proportionately to protect victims, reduce risk, prevent further harm, and address the behaviour.
 - e) Recognising that victims may be particularly vulnerable, we provide a tailored response that considers the intersection of different social identities, offering additional communication, reassurance, and support to address their unique needs.
 - f) We work in partnership with local authorities, police, community groups, and others to share information, coordinate responses, and effectively address hate incidents within our communities.

5 OUR DEFINITION

- 5.1 Our definition of a hate incident is as any incident, whether a criminal offence or not, that is perceived by the victim or any third party to be motivated by hostility or prejudice based on protected characteristics. These include disability, race, religion, sexual orientation, or transgender identity (whether actual or perceived). In addition to these nationally monitored strands, we also include age, gender, and alternative subcultures.
- 5.2 Alternative subculture refers to groups with a distinct collective identity, unique values, and specific styles in clothing, makeup, body art, and music e.g., goths.



- 5.3 A victim does not need to meet our definition. For example, one does not need to be homosexual to experience homophobic abuse. Inaccurate assumptions do not negate its classification as a hate incident.
- 5.4 We also recognise that people may experience multiple forms of discrimination simultaneously and these can intersect to create a nuanced and heightened experience for the victim that cannot be considered in isolation.
- 5.5 Hate incidents can take a variety of forms; examples include but are not limited to:
 - a) verbal/online abuse including offensive jokes,
 - b) violence or threats of violence, damage, arson/attempted arson, harassment, mate crime.
- 5.6 Mate crime involves the befriending, exploiting and/or abuse of a vulnerable person e.g., financial, sexual and/or criminal exploitation and cuckooing etc. Victims may be vulnerable owing to a learning disability, age or physical or mental health condition and may not recognise themselves as a victim. Officers must apply our Safeguarding Policies where appropriate.
- 5.7 Although individual incidents may not constitute a crime, repeat incidents may amount to harassment and in turn exacerbate a victim's trauma and marginalisation, affecting their wellbeing and increasing vulnerability. We take all reports of hate seriously, recognising the cumulative impact of repeat incidents, and encourage our customers to report all incidents to ourselves and the Police.

6 PREVENTION, DETERRENCE AND AWARENESS

- 6.1 We seek to prevent and deter incidents from happening in the first place, adopting the following means where appropriate:
 - a) Seeking to understand the demographics and diverse needs of our customers.
 - b) Setting clear expectations about acceptable behaviour and raising awareness of what constitutes a hate incidents and crime, how to report them, and the importance of considerate living and community cohesion. This is communicated at sign-up and reinforced through regular channels such as newsletters, forums, and our website.
 - c) Raising visibility of our reporting process and support options within our projects and digital platforms.
 - d) Collaborating with partners to organise and/or participate in local initiatives which educate and encourage positive relations within communities, e.g. family fun days, estate walkabouts, and advice surgeries.
 - e) Celebrating relevant national awareness days, e.g. Hate Crime Awareness Week, by organising, supporting and participating in community events.
 - f) Using data to identify trends and hotspots, including hate-motivated political activity, to allocate resources, address rising tensions and work with partners effectively.

7 REPORTING HATE INCIDENTS

Accessibility

7.1 To support individuals in reporting hate incidents confidently and easily, we provide:



- a) A range of reporting methods to meet different needs and communication preferences as outlined in the ASB Policy.
- b) Information on our website that clearly outlines how to report hate incidents, what happens next, and where to find help.
- c) A serious, supportive, and non-judgmental response that validates victims' experiences and builds trust in our approach.

Third Party Reporting

7.2 We encourage use of Third-Party Reporting Centres, where trained staff can report incidents to the police on behalf of victims and witnesses, provide guidance, and assist with obtaining relevant support. Officers will be able to assist in obtaining details of local and national centres.

8 RISK AND PRIORITISATION

- 8.1 We are committed to responding swiftly and effectively to hate incidents, classifying them as high risk with a one-day response time, meeting with the victim promptly, addressing any damage (if required), and facilitating referrals to support services.
- 8.2 Where a victim's safety is at risk of harm (emotionally or physically), we will consider appropriate actions. This may include target hardening options, increased presence of our officers/partners on estates. In the most serious cases, we may consider whether rehousing the victim is the most appropriate way of reducing harm. If we are unable to offer such accommodation, we will endeavour to support and assist victim(s) by liaising with the relevant Local Authority and or other housing providers where appropriate.
- 8.3 Where a victim moves property, it does not preclude us from taking proportionate action against the person causing the harm, if there is evidence to do so. Any action will be taking in line with our ASB policy and procedures.
- Any immediate risk to life, serious harm, or property should also be reported to the police (if not already done by the victim). We will also refer to our Safeguarding Policy and Procedures where relevant.

9. TOOLS AND POWERS

9.1 Where we have evidence to prove that hate incidents have occurred, we will take proportionate action. We will consider the full range of tools and powers available to us as outlined in our ASB Policy. We will take the severity of the behaviour, impact, what action is likely to prevent further incidents and what action has been taken by partner agencies when determining the most appropriate and proportionate action to take.

10. PARTNERSHIP WORKING

10.1 We recognise that responding to hate incidents often requires additional expertise and sensitivity. Therefore, alongside standard multi-agency partnerships, we specifically engage with specialist hate crime organisations and community groups to ensure a culturally informed and victim-centred approach.



10.2 Where appropriate, we will participate in or convene case-specific professional meetings focused on hate-related harm. These meetings enable all relevant partners to share information, draw on shared learning from previous cases, and collaborate in formulating a partnership action plan that clearly defines roles, responsibilities, and the steps needed to manage risk and support victims. This targeted approach enhances our ability to address the unique risks and impacts of hate incidents, promoting effective prevention, support, and resolution.

11. SUPPORT

Victims

- 11.1 We recognise that hate incidents have a profound impact on an individual's core identity and can significantly affect their mental and physical wellbeing. Victims often experience heightened anxiety and a risk of repeat victimisation. We therefore offer additional communication, reassurance, and referrals to specialist support agencies, while exploring restorative options where appropriate.
- 11.2 Where available and appropriate, we will refer victims to restorative justice or mediation services as part of our response to hate-related incidents. Restorative approaches can help victims gain a deeper understanding of the incident and may support perpetrators in recognising the harm caused and changing their behaviour. However, it can only proceed if both the victim and perpetrator agree to participate.
- 11.3 Officers should use their local knowledge and understanding of individual cases to ensure appropriate signposting or referrals to support services. A range of local and national organisations offer specialist advice and support to those affected by hate incidents including Stop Hate UK and True Vision, who provide accessible, comprehensive information tailored to the various types of hate incidents/crimes.

Those Causing the Harm

11.4 Where appropriate, and with victim consent, we encourage individuals responsible for haterelated harm to engage in restorative justice and participate in behaviour change programmes if available in their local areas, to help address prejudice and intolerance. Additional support and interventions may also be offered based on individual needs to promote positive behavioural change.

12. TRAINING AND DEVELOPMENT

- 12.1 'It is the responsibility of all AHHA staff to implement this policy effectively. All officers will receive training that is appropriate to their role and responsibilities, enabling them to identify, respond to, and record hate incidents with confidence and accuracy.
- 12.2 We are committed to keeping staff informed of changes in legislation, regulation, and best practice through regular updates and ongoing learning opportunities. This ensures our response remains compliant, current, and effective.
- 12.3 Training will also focus on raising awareness of the significant impact hate crime can have on both ethnic and non-ethnic minority groups, particularly in relation to mental and physical wellbeing. We will ensure that staff understand the importance of recognising and responding to individual cultural needs and sensitivities as part of a respectful, person-centred approach.



This includes the appropriate use of language and terminology when engaging with victims, as well as being mindful of cultural customs and practices when visiting people in their homes...

13. CUSTOMER ENGAGEMENT AND FEEDBACK

- 13.1 We seek to engage our customers to help shape all of our policies and procedures. We do this by obtaining feedback on drafts from our customer scrutiny panel which help to inform and shape this document.
- 13.2 We actively seek feedback from those with lived experience to identify what is working well, what could be improved, and to inform ongoing service improvements. Our processes are reviewed regularly to remove repeat barriers, particularly for minority or marginalised groups.

14. REVIEW OF THIS POLICY

14.1 This policy will be reviewed after the first 12 months and thereafter on a 3-year cyclical basis. This may occur earlier if there is a change in legislation, regulation which necessitates it or at the request of staff/management.

15. **EQUALITY, DIVERSITY & INCLUSION**

15.1 When considering Hate incidents there are no negative impacts arising from this Policy based on a customer's race, religion, disability, gender or gender identity, sexual orientation, marital or civil partnership status, pregnancy, or age.

16. DATA PROTECTION

The General Data Protection Regulation (GDPR) requires compliance with principles for processing personal data, including protecting against unauthorised access of personal data. Personal data that is inappropriately accessed or disclosed may constitute a data breach. The GDPR requires organisations to keep a record of all data breaches and, where the breach is likely to result in a risk to the rights and freedoms of individuals, the organisation must notify the ICO within 72 hours of becoming aware of the breach. If the data breach results in a high risk to the rights and freedoms of individuals, those individuals must be notified without undue delay.