

Hate Crime and Incident Policy

Policy Owner	Tenancy and Neighbourhood Housing Manager
Version	V1 - New Policy
Frequency of Review	At least every 3 years
Date Document Last Reviewed	March 2026
Date of Next Review	March 2029
EQI Assessment Required / Completed	Yes – 20.03.26
Data Impact Assessment Required / Completed	Not required as the policy does not involve any notable changes to the way in which Cottsway process personal data.
Reviewed By	Cottsway Customers Specialist ASB Consultant Community Safety Partnership Neighbourhood Team
Approved By	Deputy CEO – 01/04/2026

1. Policy statement

- 1.1. Cottsway Housing Association (“we”) understand the significant impact that Hate Crime and Hate Incidents can have on people and communities.
- 1.2. This policy sets out our general approach as to how we prevent, manage, and respond to hate related issues and applies to all our customers, including those living in general needs housing, leasehold properties and shared ownership homes. It reflects our wider commitment to preventing and deterring hate crime and hate incidents, raising awareness, supporting victims, and promoting inclusive, respectful and safe communities
- 1.3. Our ASB policy and procedures must be read and fully applied alongside this policy. They outline all actions, options and processes that must be followed when managing any ASB case, including hate crimes and incidents. This specific policy addresses the additional requirements and considerations when managing hate cases.

2. Definitions

- 2.1. We use the following definition of hate crime: any criminal offence or incident perceived by the victim or any 3rd party to be motivated by hostility or prejudice based on a person’s disability, race, religion, sexual orientation, or transgender identity.
- 2.2. A victim of hate crime does not need to meet our definition detailed at 2.1, e.g., one does not need to be gay to experience homophobic abuse.

- 2.3 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.
- 2.4 Mate crime, a form of hate 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 Policy where mate crime is identified.
- 2.5 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.
- 2.6 Hate incidents directed towards our staff, contractors, or representatives will be taken seriously and addressed in line with this policy and our Customer Unreasonable Behaviour Policy.

3 Policy scope and objectives

Our approach to hate crime and incidents is guided by the following principles, which complement and expand on those set out in our ASB Policy:

- We recognise the debilitating impact of hate crime on individuals, families, and communities, including its potential to heighten tensions and disorder. We are committed to fostering safer, more inclusive environments that uphold equality, diversity, and inclusion (EDI).
- We strive to raise awareness about hate crime, including how to report it and the actions we take to address it as well as ensuring our reporting methods and communication channels are clear and accessible.
- All reports are treated in a confidential, serious and sensitive manner.
- Hate incidents and crime derive from prejudice. This is something we will not tolerate. We will act quickly, proportionately and appropriately to protect victims, prevent further incidents, and address the behaviour where there is evidence to do so.
- 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.
- We take a victim-centred approach when responding to hate incidents and crimes. If a victim (or other person) believes that an incident was motivated by hate, we will treat it as such unless proven otherwise or deemed wholly unreasonable.

3.1. **Prevention and deterrence**

We work proactively to prevent hate crimes and incidents by understanding customer demographics and needs, providing information and education through key communications at start of a tenancy and through our customer engagement channels.

We work collaboratively with partners on initiatives that promote positive relationships and early intervention where appropriate.

3.2 **Raising awareness and encouraging reporting**

We recognise that hate crime/incidents are often underreported owing to fear, previous negative experiences, or lack of awareness.

We are committed to ensuring that hate crime and hate incidents can be reported in a way that is accessible and appropriate to individual needs. The accessibility measures, reasonable adjustments and alternative reporting options set out in our ASB Policy apply equally to the reporting and handling of hate crime and hate incidents.

We also accept reports made by third parties. Where a report is received from a third party, we will seek to make contact with the victim to understand their wishes and offer support. However, where appropriate, we may still take action based on third-party evidence even if the victim chooses not to engage directly.

3.3 **Risk and prioritisation**

We are committed to responding quickly and effectively to all reports of hate crime and hate incidents. In line with our ASB Policy, these cases are treated as high risk, and we aim to make initial contact within one working day using the victim's preferred method. This may include meeting them at a suitable location, assessing and addressing any immediate risks or damage (including the removal of hate related graffiti), and arranging referrals to relevant support services.

Our ASB procedure includes risk assessments to identify hate-motivated incidents and any factors that may increase harm, such as repeat victimisation or limited support networks.

3.4 **Support for victims**

We recognise that hate crimes and incidents can cause significant distress and increase the risk of repeat harm. Officers must respond sensitively, provide reassurance, and signpost or refer victims to appropriate support services.

Safeguarding will be based on individual circumstances, using local and national services such as Stop Hate UK and True Vision.

Where damage occurs, we will act quickly in line with our ASB Policy, including removing hate graffiti or making a property safe once Police evidence requirements are met.

Target hardening measures will be offered where appropriate, working with partners as needed.

If there is an immediate safety risk, emergency accommodation may be provided under the Lettings Policy, or through the Local Authority or other housing providers. Non-urgent move requests will also follow the Lettings Policy.

Relocating a victim does not prevent proportionate enforcement action against the perpetrator where evidence allows, in line with our ASB Policy.

3.5 Support for those causing the harm

Those causing harm may have individual needs. Officers will collaborate with appropriate partners to help them access support where available, while ensuring that any interventions do not compromise the safety or wellbeing of victims or staff.

With the victim's consent, we will encourage those who have caused harm to engage in mediation, restorative justice, or relevant education and behavioural change programmes in their local area. Participation in these programmes does not replace enforcement action where necessary.

3.6 Tools and powers

We do not tolerate hate crime/incidents and prioritise the safety and wellbeing of those affected. Where there is evidence of such behaviour, we will take swift and proportionate action, using the full range of tools and powers available to us as set out in our ASB Policy and Procedures, and support our partners in doing the same.

3.7 Partnership working

Addressing hate crime/incidents often requires collaboration with a range of partners. Where appropriate, we will work with the Police, Local Authority teams, and relevant support services, using established multi-agency forums and organising case-specific professional meetings to share information and agree joint action plans.

3.8 Freedom of speech

We recognise and respect the right to freedom of expression. Free speech plays an important role in enabling open discussion, debate, learning, and the exchange of ideas, including the ability to challenge and explore different perspectives through conversation, education, and lawful expression.

However, freedom of expression must be exercised responsibly. This right does not extend to targeted behaviour that is threatening, abusive, or

grossly offensive, and which targets individuals or groups based on a protected characteristic, or is intended to intimidate, harass, or encourage hatred. Such behaviour may constitute a hate incident or hate crime.

4 Regulatory and legal considerations

The following legislation is relevant to this policy (and not an exhaustive list):

- Housing Act 1988, 1996 and 2004
- ASB Crime and Policing Act 2014
- Crime and Disorder Act 1998
- GDPR 2018
- Human Rights Act 1998
- Equality Act 2010
- Social Housing (Regulation) Act 2023

This policy also supports our obligations under the Regulator of Social Housing's Neighbourhood and Community Standard

5. Monitoring and reporting

All cases are regularly reviewed by the case officer and/or their line manager, to ensure that they are progressing in a timely and effective manner and that any risks have been identified and managed.

Cottsway will monitor performance in preventing and tackling hate crime through satisfaction surveys and customer feedback. Findings will inform our Hate Crime Policy and help us to shape and improve customer service and satisfaction.

This service will be captured as part of our KPI monitoring framework and regularly reviewed by CLT. Performance information will be shared with Customer Committee to demonstrate compliance with the Consumer standards (specifically neighbourhood and community standard).

6. Equality, diversity and inclusion

Cottsway will treat all customers with fairness and respect. We recognise that we have an ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of age, sex and sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

We will aim to ensure that the individual needs of our customers are met in implementing this policy by having due regard to the Equality Act 2010, for example the provision of translated materials, or home visits with a carer or access to other support agencies if appropriate.

7. Associated documents policies and procedures

The following policies/procedures are relevant to this policy:

- Equality, diversity and Inclusion
- Lettings
- Estate management
- Domestic abuse
- ASB Policy and procedure
- Adults and Children Safeguarding Policy
- Data protection protocols
- Customer Unreasonable Behaviour Policy
- Dignity at Work Procedure
- Customer Feedback and Complaints Policy
- Keeping Pets Policy
- Vulnerable Tenants Policy
- Good Neighbourhood Management Policy

8. Staff training

Our officers will be kept up to date on related Hate Crime legislation, policy, and best practice to ensure they have the skills required to effectively manage hate crime cases including:

- All Neighbourhood Housing Officers will receive updated Policy and Procedure training in house and wider specialist hate crime training on an on-going basis.
- All new staff entering Cottsway's Customer Services will receive training on our Hate Crime and Incident Policy and Procedures on induction. All existing staff within Cottsway's Customer Services will receive annual refresher training.
- All staff within Cottsway will be expected to actively support Cottsway's Hate Crime and Incident Policy, for example by attending Court and giving evidence if required.

9. Customer engagement

We have liaised with customers to seek their views, including those affected by ASB previously to shape this policy as well as ensuring it is clear and easy to understand.

We have updated our website with clearer information and guidance on reporting because of this customer feedback.

10. Review

Cottsway's Hate Crime Policy will be reviewed every 3 years or sooner, subject to any changes in legislation or regulation and/or recommendations by the Audit and Risk Committee and the business which may trigger an earlier review.

11. Appeals

Customers have a right of appeal under this policy where a notice to commence legal action is served to end an introductory tenancy or where we rely on a mandatory ground for possession due to a hate crime.

List of changes

Date	Change
March 2026	Introduction of new policy to align with RSH Consumer standards – Neighbourhood and Community Standard