

Croydon Churches Housing Association

Hate Crime and Hate Incident Policy

1. Policy Statement

- 1.1** We are committed to creating and sustaining safe, inclusive and respectful communities. We take a zero-tolerance approach to hate crime and hate incidents and recognise the serious impact such behaviour can have on individuals and communities.
- 1.2** We will respond to all reports promptly, sensitively and fairly, using a Proportionate, Evidence-based and Necessary (PEN) approach. Our priority is to protect victims, prevent escalation and take effective action where required.
- 1.3** Hate crime and hate incidents are recognised as potentially high-risk and will be prioritised accordingly.

2. Purpose of the Policy

- 2.1** The purpose of this policy is to set out our commitment to preventing, responding to and supporting residents affected by hate crime and hate incidents.
- 2.2** We recognise that hate-motivated behaviour can have a serious and long-lasting impact on individuals, families and communities. Our approach is victim-led, proportionate and fair, and focuses on safety, support and early intervention.
- 2.3** This policy provides clarity on our role and responsibilities and what residents can expect from us.
- 2.4** This policy sets out our approach to:
 - Preventing and responding to hate crime and hate incidents
 - Supporting and protecting victims
 - Taking appropriate action against perpetrators
 - Working with partners to reduce harm and risk
 - Meeting regulatory and Ombudsman expectations

3. Scope

- 3.1** This policy applies to:
 - All residents regardless of tenure
 - Household members and visitors

- Behaviour occurring in or around our homes, communal areas, and neighbourhoods
- Hate crime and hate incidents reported to us directly or identified through our work

3.2 Where an allegation involves a member of staff or contractor, we will manage the incident in line with policy and take appropriate action through our internal HR or contract management procedures

4.0 Legislation, Regulation and Related Policies

4.1 This policy aligns with the following Legislation and Regulatory Requirements:

- Equality Act 2010
- Anti-social Behaviour Crime and Policing Act 2014
- Crime and Disorder Act 1998
- Criminal Justice Act 2023
- Public Order Act 1986
- Human Rights Act 1998 (Article 8 and Article 14)
- Data Protection Act 2018/UK GDPR
- Environmental Protection Act 1990
- Racial and Religious Hatred Act 2006
- Protection from Harassment Act 1997
- The Housing Act 1996
- Anti-terrorism Crime and Security Act 2001
- Environmental Protection Act 1990
- Domestic Abuse Act 2021
- The Housing Ombudsman's Spotlight Report on ASB
- The Regulator of Social Housing Consumer Standard
- Housing Ombudsman's Complaint Handling Code
- Housing Ombudsman relevant Spotlight Reports

4.2 This policy has links to some of our other policies and should be read in conjunction with the following policies:

- Anti-Social Behaviour Policy
- Equality, Diversity and Inclusion Policy
- Safeguarding Policy
- Complaints Policy
- Allocations and Lettings Policy
- Data Protection Policy
- Domestic Abuse and VAWG Policy
- Repairs and Maintenance Standards
- Unacceptable User Policy

5. Definitions

5.1 Hate Incident

A hate incident is any incident which is perceived by the victim, or any other person, to be motivated by hostility or prejudice based on a protected characteristic.

5.2 Hate Crime

A hate crime is a criminal offence that is motivated by hostility or prejudice towards a protected characteristic.

6. Protected Characteristics

6.1 As defined under the Equality Act 2010, including but not limited to:

- Race or ethnicity
- Religion or belief
- Disability
- Age
- Sexual orientation
- Gender reassignment
- Sex

6.2 We apply a belief-based definition, meaning the resident's perception is sufficient for an incident to be treated as hate-related.

7. Expectations

7.1 What residents can expect from us

We will:

- Take all reports of hate crime and hate incidents seriously
- Listen to residents and treat them with dignity and respect
- Use a victim-centred and trauma-informed approach
- Assess risk promptly and prioritise safety
- Act in a timely, proportionate and consistent way
- Explain clearly what actions we can and cannot take
- Keep residents informed of agreed actions and progress
- Work with partner agencies, including the police and local authorities
- Make reasonable adjustments to ensure fair access to services
- Handle personal information sensitively and lawfully

7.2 What we expect from residents

7.3 Residents, household members and visitors are expected to:

- Treat others with respect “Others” includes household members, visitors, staff, contractors and anyone engaged in our housing services
- Not engage in behaviour that is abusive, threatening, harassing or hate-motivated
- Comply with tenancy, licence or lease conditions relating to behaviour

8. Our Approach

Principle	How we apply it
Proportionate	We assess the severity and impact of the incident and respond in a way that is appropriate to harm caused
Evidence-based	We gather all relevant information before taking action, while prioritising safety and support for the victim
Needs-led	Our response is focused on the needs of the person affected including support, safeguarding and referral to specialist services

8.1 Our approach to addressing hate crimes and hate incidents will be the same as we will treat both equally.

8.2 We recognise that:

- Hate incidents may not always meet the threshold for criminal action
- Hate-motivated behaviour often overlaps with anti-social behaviour
- Early intervention and support can prevent escalation

8.3 Our response will:

- Enable residents to report incidents of hate crime to us in different ways including in person, in writing, over the phone, by email and on our website
- Offer anonymous reporting to witnesses of hate crimes and facilitate the reporting of hate crimes by non-residents
- Be proportionate to the nature, frequency and impact of the behaviour
- Take account of vulnerability and support needs
- Balance enforcement with prevention and support
- Be evidence-based and fair to all parties

- Listen to the resident's account and record the report accurately
- Assess risk and agree appropriate actions with the resident
- Support residents to report matters to the police where they wish to do so
- Use our anti-social behaviour tools where proportionate and appropriate
- Raise emergency repairs where necessary, following a report of hate crime
- Work with relevant partners to manage risk and provide support
- Review actions regularly and adapt our response as needed
- Close cases transparently, explaining outcomes and learning

8.4 We recognise that not all outcomes will be those residents hope for, but we will always explain our decisions clearly and respectfully.

9. Response Times

9.1 We aim to respond to reports of hate crime and hate incidents promptly, proportionately and in line with the level of risk and impact experienced by the resident. Specific response times are outlined in our Anti-Social Behaviour Policy.

10. Expectations

- Residents can expect that our response times will be in line with our Anti-Social Behaviour Policy
- Reports of hate crime and hate incidents will not be treated as low-level anti-social behaviour
- Cases involving higher risk will receive a more urgent response
- We will carry out an initial risk assessment within one to two working days depending on risk
- We will prioritise cases involving:
 - Threats or violence
 - Repeat incidents
 - Vulnerability or safeguarding concerns
- Agree appropriate next steps with the resident as soon as practicable
- Keep residents informed of progress at agreed intervals
- Explain any delays and the reasons for them

11. Ongoing Review

11.1 Our response to hate crime and hate incidents will be kept under regular review to ensure it remains appropriate and proportionate.

11.2 We will:

- Review cases where incidents are repeated or escalate
- Adjust our response where risk or circumstances change
- Reflect on learning from cases, complaints and outcomes to improve our services

12. Responsibilities

11.1 The Housing Managers (Neighbourhoods and Housing Services) have overall responsibility for delivery and compliance with the policy.

13. Confidentiality & Data Protection

13.1 We will share information with other agencies in accordance with the Data Protection Act and GDPR. This may mean sharing relevant and proportionate information without the resident's consent, where appropriate.

13.2 For the purposes of this policy and how we manage the information that we hold on individuals as part of our management processes, we will comply with our obligations as set out under the Group Data Protection Policy.

14. Fair and Equal Treatment

14.1 We will make sure everyone is treated fairly and without discrimination, regardless of their race, gender, sexual orientation, disability, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and age. We will promote inclusion, challenge discrimination and seek to make reasonable adjustments to ensure that everyone can access our services and that no one is excluded inappropriately from any services or activities provided by us.

Version History	
Policy name	Hate Crime and Hate Incident Policy
Version	V.1
Lead Officer:	Director of Customers
Equality Impact Assessment Completed	January 2026
Data Protect Impact Assessment Completed	January 2026
Resident Consultation Completed	To be completed with ASB Policy Consultation
Colleague consultation	January 2026
Date of Issue	January 2026
Date of Review	January 2029
Policies and procedures replaced	Not Applicable