

# Brighton & Hove City Council

## Overview & Scrutiny

## Agenda Item

**Subject:** Housing Hate Incident Policy

**Date of meeting:** 8 October 2025

**Report of:** Genette Laws, Corporate Director – Homes and Adult Social Care

**Contact Officer:** Harry Williams, Director for Housing People Services  
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**Ward(s) affected:** (All Wards);

**Key Decision:** Yes

### 1. Purpose of the report and policy context

- 1.1 The Council's social landlord duties cover 12,145 rented properties and 2,210 leasehold properties (as of January 2025). The Social Housing Regulation Act 2023 (SHRA) placed a duty on social landlords to consult and publish a Hate Incident Policy.
- 1.2 The draft Housing Hate Incident policy supports the Council's compliance with the SHRA and meets the expectations of the Regulator of Social Housing including:
  - The Neighbourhood & Community Standard 2.2.2. This requires social landlords to clearly set out their approach for how they deter, and tackle hate incidents in neighbourhoods where they provide housing.
  - The Tenant Satisfaction Measures, particularly NM01, which tracks anti-social behaviour cases involving hate incidents per 1,000 homes.
- 1.3 The draft Housing Hate Incident policy aligns with the Council's [Anti-Racism Strategy](#), Equality Act 2010 obligations. The policy also aligns with the aims within the [Housing Strategy 2024 – 2029](#) to “work with residents and our partners to develop safe, healthy and inclusive estates and neighbourhoods (4.1)” and outcome 2 of the [Council Plan 2023 – 2027](#), to create a fair and inclusive city.
- 1.4 The draft Housing Hate Incident policy builds on the current service offer under the Housing [Anti-Social behaviour policy](#) with key additions to the following areas: Scope, additional measures to support victims, senior oversight, performance reporting, staff training and awareness.

## **2. Recommendations**

- 2.1 Overview & Scrutiny Committee review and comment on the draft Housing Hate Incident Policy (Appendix 1) ahead of adoption by the Council's Housing service.
- 2.2 Overview & Scrutiny Committee note the consultation report (Appendix 2)

## **3. Context and background information**

- 3.1 The draft policy is a statement of intent concerning how Housing will tackle hate incidents experienced by its residents. It includes definition of hate incidents, how Housing will respond to reports of hate incidents and ensure that victims receive appropriate support. This includes tenants living in Seniors Housing, Seaside Homes and other forms of temporary accommodation in our housing stock.
- 3.2 A hate incident refers to any action that is perceived by the victim, or by any other person, to be motivated by hostility or prejudice based on an individual's perceived personal characteristics. These characteristics include disability, race or ethnic identity, religion or belief, gender or gender identity, and sexual orientation.
- 3.3 Hate behaviour can be directed towards individuals or groups, and may also target people who are associated with others possessing one or more of the listed characteristics.
- 3.2 In line with the Social Housing Regulator's Neighbourhood and Community Standard, the policy outlines a comprehensive approach to preventing and managing hate-related behaviour associated with its housing stock.
- 3.3 This policy extends to victims and witnesses who reside in or visit council-managed properties, as well as those in other tenures who are affected by hate motivated behaviour of residents or visitors in the locality of these homes. Perpetrators are included — whether they live in council housing, visit council properties, or are external individuals whose hate-motivated behaviour impacts the Council's housing management responsibilities.
- 3.4 Data on hate incidents will be monitored and reviewed annually to improve oversight of case handling. We will take into consideration and respond to the impact of external factors, which may place individuals or communities at heightened risk.
- 3.5 Housing are aiming to fully implement the final policy by March 2026.

## **4. Analysis and consideration of alternative options**

- 4.1 Not applicable as this is a statutory requirement

## **5. Community engagement and consultation**

- 5.1 An 11-week formal consultation with residents on the draft policy was carried out. This was done using our online consultation portal 'Your Voice', with option to provide responses via phone.
- 5.2 We reached out to third sector organisations and community groups and promoted the consultation on social media, posters, plasma screens in libraries & Hove Town Hall, included an article in the Council's tenant and leaseholder newsletter, Homing In and by reaching out via texts / emails to tenants.
- 5.3 An Easy Read survey was produced for us by Speak Out. The guide was made available as hard copy and for download on Your Voice. Large print, hard copy surveys were available on request by email or phone.
- 5.4 Two in person consultation sessions were held and completion of the survey was promoted amongst tenant reps at Area Panel and the Annual Tenant Conference. The eight-week consultation was extended for a further three weeks allowing for further communication to increase the response rate and engagement.
- 5.5 57 responses to the main online consultation survey on the draft policy were received and nine responses to a supplementary survey from residents with experience of reporting hate incidents to Housing. 91.2% of responses were from individuals and 8.8% of responses were on behalf of a group or organisation.
- 5.6 Residents were asked for their views on proposals relating to supporting victims, reporting hate incidents to Housing, keeping residents informed and taking appropriate action.
- 5.7 Agreement with each of the proposals by respondents to the consultation ranged from 53.4% to 73.4%. However, just 31.6% of respondents agreed that the council is doing enough to promote awareness of action Housing can take in response to hate incidents and a sizeable minority (21.1%) felt that it wasn't clear on how to report hate incidents.
- 5.8 Residents were asked to make suggestions on how Housing can improve our response to hate incidents. Common themes were communication, staff training, referral to support, accessibility, improving awareness and information, and taking action.
- 5.9 Although a small sample size, feedback from the lived experience survey raised important issues in relation to staff training, communication, and lack of action and indicated that many victims did not feel supported.
- 5.10 A workshop was held with service managers in February 2025 to review and discuss how to implement key consultation feedback in the final policy.
- 5.11 A consultation report has been drafted (Appendix 2). It is proposed that the executive summary, consultation outcome & next steps section will be published on Your Voice (with the option to request the report in full).

## **6. Financial implications**

The cost of the training programme is to be determined but will be met from within existing resources.

Name of finance officer consulted: Mike Bentley  
September 2025

Date consulted 25<sup>th</sup>

## **7. Legal implications**

- 7.1 As stated there is now legal requirement for the Council to have a published policy with regards to anti-social behavior and hate incidents. We already have a published anti-social behaviour policy. The Housing Hate Incident policy fulfills the requirement of the legislation. This is to be differentiated on the general requirements put on the whole authority under the Crime and Disorder Act to have a similar policy in place. There are clearly cross over areas, but there are sufficient areas of difference between the objectives, that is correct to have a separate policy purely for housing. The regulator standards are still developing but this policy in our view meets the standards as currently drawn. In the event that the standards vary significantly then the documents would have to be revisited.

**Name of lawyer consulted** Simon Court    **Date consulted** 23 July 2025

## **8. Equalities implications**

- 8.1 The policy is expected to have a positive impact on all protected groups through the provision of a robust and consistent approach that is victim-centred, considering the needs and vulnerabilities of those experiencing and perpetrating hate Incidents.
- 8.2 To enhance the management of hate incidents within housing services, five strategic activities have been proposed to address potential disproportionate and cumulative impacts identified within the Equality Impact Assessment (Appendix 3):
- 8.3 The first focuses on improving data collection methods to ensure equalities strand information is accurately recorded for at least 75% of people involved in cases. Completion is targeted within one year to ensure demographic data informs future policy decisions.
- 8.4 The second activity introduces a senior oversight role for all hate incident cases, to be implemented within the first three months of policy adoption. This role will ensure each case includes a completed risk assessment, tailored action plan, appropriate referrals, and consideration of enforcement proportionality. Oversight will also involve multi-agency collaboration and annual reviews to uphold a victim-centred approach.
- 8.5 The third activity ensures frontline housing staff receive training on hate incidents within six months of policy launch. Training will cover

proportionality, mental health awareness, and intersectionality. Attendance and feedback will be monitored, and future training needs identified and coordinated by the senior oversight role in collaboration with relevant internal teams.

- 8.6 Activity four involves reviewing the effectiveness of policy implementation after the first year. Key performance indicators include satisfaction levels, complaints, case outcomes, training success, and identified trends. Feedback from agencies such as Victim Support will inform any necessary policy amendments and staff development, ensuring equitable outcomes for all service users.
- 8.7 The fifth activity prioritises improving access to the hate incident reporting service. Adjustments will include enabling reporting by third parties, signposting to advocacy support, and offering alternative formats such as large print, translated documents, and digital communications. A supporting procedure will guide officers in implementing these measures, with oversight ensuring adjustments are recorded in support plans. These changes will be in place within the first three months to ensure inclusivity from the outset.

## **9. Sustainability implications**

- 9.1 N/A

## **10. Health and Wellbeing Implications:**

- 10.1 Having a robust response to hate incidents is essential due to the profound impact hate incidents have not only on the immediate victim but also on communities.

## **Other Implications**

## **12. Crime & disorder implications:**

- 12.1 Aligns with overall aim of Council's Hate Incident and crimes action plan 2024 - 25 led by Community Safety Team: An increase in reporting and trust and confidence in statutory services, and a reduction in hate incidents and crimes, and the harm caused to individuals and communities (forms part of Anti-Racism Strategy 2023 to 2028)

## **13. Conclusion**

- 13.1 Registered providers of social housing are required to publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour and hate incidents in areas where they own and manage properties.
- 13.2 Implementing a clear policy ensures consistent procedures for reporting, recording, and responding to hate incidents. It sets out service standards, while also encouraging reporting and improving data collection which will be

used to drive service improvement, helping Housing services to identify patterns and intervene early to prevent escalation.

## **Supporting Documentation**

### **1. Appendices**

Appendix 1 – Final draft of hate incident policy for Housing

Appendix 2 – Consultation report

Appendix 3 – Equality Impact Assessment