

Group Hate Crime Policy

2023

We will provide this policy on request at no cost, in large print, in Braille, on tape, translated or in another non-written format.

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Approval body	Wheatley Group Board
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Customer engagement required	Yes
Trade union engagement required	No
Equality Impact Assessment	Yes

1. Introduction & Background

As Scotland's leading Housing, Care and Property Management Group - Wheatley Housing Group ("the Group") – promotes equality, celebrates diversity and champions inclusion across all areas of our operation and service delivery. Our mission is to make homes and lives better and we aim to achieve this through the provision of our services and building on our success to improve housing, care, and property management across all our communities.

Providing exceptional customer experience is at the heart of what we do, where we strive to deliver the highest-level of customer satisfaction, customer experience, and ensure our customers have greater choice and control to shape the services they receive. This is underpinned by an outstanding track record in the delivery of tailored and innovative services. By using evidence from customer engagement platforms, including one-to-one customer conversations, our My Voice platform, and engagement events through our Stronger Voices approach, we can design and deliver products and services that respond to our customers' priorities.

Our customers have told us that feeling safe and secure and living in a peaceful and thriving neighbourhood is extremely important to them and this, in turn, impacts on local demand and community stability. Our Group Hate Crime Policy helps support our customers' priority of feeling safe and will define our role in the prevention of, and response to, hate crime.

Our neighbourhoods are vibrant and made up of individuals who identify themselves within one or more social group which can include, but is not limited to, race, religion, sexual orientation, disability, and transgender identity. This diversity is a key contributor to our core value of building sustainable communities that have a real sense of belonging and connection. We want our customers to feel part of their community.

Wheatley Group believe in equality for all and firmly maintains that every individual should be respected, valued, and included within society. We know that the existence of hate crime has a detrimental impact on the sense of cohesion within our communities. We are committed to addressing hate crime within our neighbourhoods, and enabling our customers to live free from discrimination, harassment, and victimisation.

In 2021-2022 there were 6,927 hate crimes reported to Police Scotland. Since 2014-2015, the number of hate crimes being reported to Police Scotland has fluctuated around the rate of between 6,300 to 7,000 per year.

Of these 6,927 recorded hate crimes for 2021-2022:

- 62% included a racial aggravator;
- 27% included a sexual orientation aggravator;
- 8% included a disability aggravator;
- 7% included a religious aggravator; and
- 3% a transgender identity aggravator.

Some of these hate crimes included multiple aggravators. It is recognised that these figures do not represent the true picture of hate crime, as it is widely acknowledged that under-reporting is prevalent.

The picture within our own communities across the Group mirrors that demonstrated above; in that there are certain types of hate crime which occur more frequently than others, the main one being racially aggravated crimes.

During 2022/2023 we recorded 157 cases of hate crime across the Group, which was broken down as follows:

- Racially aggravated crimes accounted for 55% (87 cases);
- Sectarian accounted for 18% (28 cases);
- Homophobic accounted for 17% (26 cases);
- Disability accounted for 7% (12 cases);
- Faith and Religion accounted for 3% (4 cases); and
- No reports of any Transgender hate crimes during 2022-2023.

It is widely recognised that these figures do not represent the true picture of hate crime given under-reporting. It is also recognised that intersectionality can significantly impact how people experience hate crime (e.g. where they have a combination of protected characteristics that are targeted such as racial and sexual orientation).

There are several reasons why victims of hate crime do not feel able to report, including:

- Fear of retribution or that the situation may get worse if reported;
- Acceptance/normalisation of prejudice (e.g. *'it happens all the time'*, *'I'm just used to it, it's no big deal'*);
- No point – nothing will be done about it;
- Having to repeat traumatic experiences;
- Fear of not being believed or taken seriously;
- Mistrust in agencies;
- Concern that the incident wasn't 'serious enough';
- Historic criminalisation (e.g. within the Lesbian, Gay, Bisexual and Transgender 'LGBT+' community);
- Fear of the process to report (e.g. going to court and facing perpetrator);
- Negative past experience of reporting;
- Accessibility concerns, particularly for those where English is not their first language;
- Fear of deportation or detrimental effect it will have on immigration status; and
- Fear of being outed as LGBT+

We recognise the importance of engaging directly with our customers across our communities and helping them build their confidence to report hate crime.

The Scottish Government and Police Scotland published the Hate Crime Strategy for Scotland in March 2023. The vision set out within this document ***is for a Scotland where everyone lives free from hatred and prejudice*** and to achieve this requires agencies and organisations to work together, as no one single agency can address the deep-rooted problem of hatred on its own.

There are 3 main aims outlined in the strategy and 14 commitments to support the achievement of the aims which are highlighted at Appendix 1.

Our Hate Crime Policy outlines the Group-wide approach towards all aspects of hate crime; including our response to dealing with incidents of hate crime, the support we provide to victims of hate crime (both staff and customers) and the existing and ongoing work we are undertaking in this field to ensure our neighbourhoods are safe and vibrant places to live and work for all.

2. Hate Crime Explained

2.1 What is a Hate Crime?

Hate crime is a type of crime that can have a significant detrimental impact on the lives of those who are affected by it and can take many forms.

Any criminal offence can be a hate crime, if it was motivated by and carried out because of hostility or prejudice based on an individual's protected characteristic of:

- Race;
- Religion;
- Disability;
- Sexual Orientation; and
- Transgender Identity.

The Hate Crime and Public Order (Scotland) Act 2021 extends the protected characteristics to include hostility or prejudice based on age and updates the definition of transgender identity, where it now includes a separate provision for 'variations in sex characteristics' as a protected characteristic. This legislation is expected to come into force in early 2024. This policy will be reviewed again in line with this legislation once it has been implemented.

Hate crimes can take a number of forms, including, but not limited to the following:

- Physical Assault;
- Damage to property (e.g. graffiti, arson, vandalism);
- Fly tipping or dumping rubbish at someone's door;
- Putting dangerous materials through a letterbox;
- Intimidating or threatening behaviour, including obscene calls or gestures;
- Deliberate dog fouling;
- Offensive literature such as letters, leaflets, posters;
- Verbal abuse or insults including name calling;
- Online bullying and abuse; and
- Emotional, psychological, and financial abuse, including threats, blackmail, and extortion.

2.2 Definition of Hate Crime

The definition accepted by the Hate Crime Working Group within Glasgow, of which the Group are a member, is the Police Scotland definition outlined below:

“Any crime which is perceived by the victim or any other person to be motivated (wholly or partly) by malice and ill will towards a social group” (Police Scotland)

You will find the link to this and further information from Police Scotland on hate crime [here](#).

2.3 Definition of Hate Incident

A hate incident is any type of incident that is **not a criminal offence**, but something which is perceived by the victim or any other person to be motivated by hate or prejudice.

“Any incident which is perceived by the victim, or any other person, to be motivated (wholly or partly) by malice and ill will towards a social group but which does not constitute a criminal offence”.

(Police Scotland)

Police Scotland track hate incidents as well as hate crimes and use this data to inform policing going forward – this encourages reporting of incidents where the member of the public is not certain that a criminal event has taken place or is mistaken in their understanding of the law, but where the motivation of prejudice for the event is clear.

You will find the link to the definition and further information from Police Scotland on hate incident [here](#).

2.4 Importance of Perception

The key element in a hate crime and hate incident is the **perception** of the victim or any other person witnessing the incident and their belief that the motivation of the individual perpetrating the behaviour was based on hate or prejudice towards one of the protected characteristics.

This means that the motivation of the perpetrator is more relevant than the identity of the victim; for example, if a heterosexual person is assumed to be gay by the perpetrator and is the target of a homophobic attack, this is still considered a hate crime.

2.5 Examples of Hate Crime

The examples of hate crime below, should be used as a guide only to illustrate the forms hate crime may take and to assist staff in identifying hate crimes. It is also important to remember that hate crimes can have more than one prejudice behind them.

Racist hate crime includes crime motivated by prejudice based on race, ethnicity, nationality, skin colour and/or other characteristics associated with race or ethnicity, (for example styles of dress, headwear etc.)

Religious hate crime includes crime motivated by prejudice based on religion or faith, including having no faith or being a member of a religious sect.

Disability hate crime includes crimes motivated by prejudice based on disability, defined by the Equality Act 2010 as ‘a physical or mental impairment that has a substantial and long term negative effect on a person’s ability to do normal daily activities.’

Homophobic hate crime is based on sexual orientation, includes crimes motivated by prejudice against lesbian, gay and/or bisexual people.

Transphobic hate crime includes crime motivated by prejudice based on transgender identity. Transgender identity describes people whose gender identity or expression differs from that normally associated with their birth sex.

3. Policy Aims and Objectives

3.1 Our Aim

Our aim is to work with customers, staff, and partners to develop peaceful and connected neighbourhoods and make homes and lives better for all. We will design and deliver services to minimise the risk of harm, abuse and prejudice within our communities and engage with customers and stakeholders to ensure their opinions and experiences feature throughout.

3.2 Our Objectives

We will achieve our aim by successfully implementing the following objectives:

- We will ensure our policies and operational resources are **fit for purpose** and meet the needs of our customers and staff;
- We will develop an **action plan** on steps we will take to support our customers experiencing hate crime which will reflect and take account of the wider National hate crime strategic and legislative activity and picture;
- We will support those affected by hate crime and the circumstances will be **investigated professionally and thoroughly** under our Unacceptable Actions Policy (for incidents perpetrated against staff) and our Antisocial Behaviour (ASB) Framework (for incidents perpetrated against customers);
- We will work in **partnership** with external agencies and organisations, including Police Scotland who have a duty to investigate hate crimes and Incidents;
- We will **provide support** to those affected (both staff and customers) and proactively work to develop and maintain relationships and partnerships with external organisations working with victims of hate crime;
- We will embed a culture of **early intervention**; working closely with frontline officers and other staff groups, and will respond quickly to any signs of marginalisation of our customers;
- We will **raise awareness** of hate crime and ensure staff are responsive to this in an educated and sensitive manner and equipped to support those impacted;
- We will **support our customers** to report hate crime. A key element of delivering on this objective will be promoting awareness and education at every opportunity;
- We will ensure all reports of hate crime are **taken seriously** by the Group and investigated thoroughly through our ASB reporting processes and Unacceptable Actions Policy; and
- We will use our ASB Framework to support staff in maintaining a **consistent approach** in tackling hate crime within our communities.

4. Our Role

Our responsibility in dealing with hate crime is to raise awareness of its existence and prevalence, encourage increased reporting and, when it does occur, utilise the policies, resources, and powers at our disposal to tackle it, and to support those impacted. We will work in partnership with Police Scotland to achieve this.

We will gather data to ensure we have oversight of the picture within our communities, which allows us to effectively target the issue and allocate the appropriate resources to do so. This also allows us to conduct early intervention and prevention activities.

Our Centres of Excellence and Hub Offices will be Third Party Reporting Centres, where formally trained Hub Officers are able to support those affected to submit a third-party report of hate crime to Police Scotland. In line with our new operating model, our frontline staff can support our customers in their homes and communities to make a third-party report. Further information on third-party reporting is provided in detail in section 5.

We have a real visible presence within our communities, with a number of our frontline staff interacting with our customers on a daily basis through frontline housing, Neighbourhood Environmental, repairs services and Wheatley Care services. This degree of customer interaction provides us with valuable information on the issues important to and affecting our customers.

4.1 Awareness, Identification and Response to Hate Crime

We may become aware of hate crimes or incidents from a number of sources; including but not limited to the following:

- Disclosure by the customer;
- Disclosure by a third party;
- Disclosure by a member of staff, contractor, or supplier during the course of their duties; and
- Disclosure by a partner agency.

All reports of a hate crime are investigated through the Group's Anti Social Behaviour ("ASB") Framework under the provisions pertaining to the most severe category of ASB - Category A cases. Category A cases are automatically referred to our Community Improvement Partnership (CIP) staff who are highly trained and specialised in providing a tailored service for the more severe ASB cases.

Any customer who discloses they have been the victim of a hate crime will be treated in an empathetic, supportive, and non-judgemental way. There are various resolution options available to our staff; ranging from engaging with statutory partners such as Police Scotland to utilising some of our enforcement-based ASB powers.

For hate crimes perpetrated against a member of staff, managers will refer to our Unacceptable Actions Policy and provide support for the member of staff through our People Services Team and provision of CIP/Police Scotland advice.

Preventative Approach

To try and eradicate the behaviour, it's imperative we seek to understand the underlying cause and work with the perpetrator to both establish this and address it. Referrals for support to internal services as well as signposting to external services or agencies, can be utilised by staff as a more preventative approach. Certain diversionary activities, wider action engagement, multi-agency case discussions and education or training solutions to help affect behavioural change of the perpetrator can be utilised.

Victims will be supported throughout the process with advice, guidance, and information and we will signpost victims to relevant external services or agencies, to provide additional bespoke support as necessary (e.g. Victim Support Scotland).

Enforcement Based Approach

If a more enforcement led approach is required to deal with the behaviour and conduct, then staff can utilise the various legislative powers available to Registered Social Landlord's (RSLs) through the Antisocial Behaviour etc. (Scotland) Act 2004 and the Housing (Scotland) Act 2001 as amended, including:

- Acceptable Behaviour Contracts (ABC);
- Unacceptable Behaviour Notices (UBN);
- Mediation (non-legislative);
- Warning Letters (non-legislative);
- Interim Antisocial Behaviour Orders (Interim ASBO);
- Antisocial Behaviour Orders (ASBO);
- Notice of Proceeding for Recovery of Possession (NPRP);
- Eviction Orders; and
- Short Scottish Secure Tenancy.

The severity of a Category A case determines that action will be taken within 1 working day from report and the incident investigation and appropriate action is taken and the resolution method implemented within 10 working days, as outlined within our ASB Framework. This would be termed for the incident to be 'resolved' at this stage, which is in reference to the language used within the Scottish Housing Regulator guidance in terms of how RSLs should report ASB performance as part of their Annual Return on the Charter.

The definition of a case being resolved is set out by the Scottish Housing Regulator as *'where the landlord has taken appropriate measures, as set out in its ASB policies and procedures, to address the cause of the ASB complaint and has advised the complainer of the outcome'* or *'where the landlord does not have the authority or power to resolve and it has provided a full explanation of the landlord's position to the complainer'*.

We will provide reassurance to the victim and seek to maintain confidentiality where possible; however, on occasion, there will be certain circumstances where our duty of care as a responsible landlord will require us to pass information over to the relevant authorities.

In some situations, those affected by hate crime may also meet what is commonly referred to as 'the three-point test' to be deemed an adult at risk under the Adult Support and Protection (Scotland) Act 2007. An adult at risk of harm is any person aged 16 or over who:

- Is unable to safeguard their own wellbeing, property, rights or other interests;
- Is at risk of harm; and
- Because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

Where we have concerns an adult may be deemed an adult at risk, we will report our concerns to Social Work / Police Scotland as appropriate, in line with our Adult Support and Protection Policy.

In situations where we believe an adult is an adult at risk, we may, on occasion, require to share information without the consent of the adult. We will ensure we are clear on our legal basis for sharing information in these circumstances.

4.2 Remaining rooted within our Communities

We have a real visible presence within our communities, with a number of our staff interacting with our customers on a daily basis through the services we provide. This degree of customer interaction gives us intelligence and valuable information on the issues important to our customers and, as a result, helps shape our service delivery. It also assists greatly in establishing any trending patterns to allow for targeted activity, including early intervention and education activity, which will ensure our customers feel integrated within the community and proud to be part of this.

By engaging with our customers to help them feel more in control of how and when they access support and improving access to information, we will improve their perception of value. We know that helping people feel more in control contributes to improving resilience, health and wellbeing outcomes. We will utilise our Stronger Voices approach to support with this.

We will build staff skills so that our people will be empowered to deliver personally tailored holistic packages of support to some of our most vulnerable customers. This will take the form of training, support and guidance from the Antisocial Behaviour Intervention and Prevention Officers and Police Scotland colleagues from within the CIP and by using internal communications to all staff across the Group.

5. Reporting Hate Crime

5.1 How to report hate crime

Hate crime can be reported in many different ways and Police Scotland encourage the reporting of hate crime to them, which they will always take seriously. It can be reported in any of the following ways:

- By calling 999 (emergency) or 101 (non emergency);
- In person at any police station;
- By completing a hate crime reporting form [here](#).
- Text 999 (for registered users only);
- Using the 999 BSL service [here](#).
- Through the British Transport Police;
- At a Third Party Reporting Centre (more information below); and
- On the Keep Safe Scotland App.

It can also be reported anonymously to Crimestoppers on 0800 555 111.

Details about what to expect when reporting hate crime can be found within the Victim Support Scotland and Police Scotland Hate Crime Toolkit [here](#).

5.2 Third Party Reporting

Some victims and witnesses of hate crime, for various reasons, are reluctant to report the crime directly to Police Scotland. As a result of this, the Third-Party Reporting scheme was developed, to help break down the barriers that stop people from coming forward.

Third Party Reporting Centres allow victims or witnesses to submit a report of hate crime to Police Scotland via a third-party report. Third Party Reporting Centres are safe and supportive environments, based within local communities, where victims or witnesses can speak about hate crime and can act as a link between the individual and the Police. This service is overseen by Police Scotland in Scotland and is a nationwide initiative across the UK.

Third Party Reporting Centre staff are trained to help victims and witnesses report a hate crime and can take a report from a victim or witness and forward it to Police Scotland, where they will act upon it as if this was received directly from the victim or witness themselves. The process is straightforward and user-friendly, with only the requirement for completion of a short electronic form to submit the details of the incident, which will be followed up timeously by Police Scotland.

Our Centres of Excellence and Hub Offices across the Group are Third Party Reporting Centres where formally trained Hub Officers are able to support those affected to submit a third-party report of hate crime to Police Scotland. In line with our new operating model, our frontline staff can support our customers in their homes and communities to make a third-party report.

Wheatley Group staff can also submit concerns through Community Information Reports. Whilst this practice is actively encouraged, it should not be used as a substitute for calling Police Scotland where there is a threat or risk of harm to our customers, which must always be reported to Police Scotland by calling 999 or 101 depending on the circumstances.

6. Leading the Way in Designing New and Innovative Services

In addition to our response to dealing with incidents of hate crime through our ASB Framework, we will also continue to design and deliver services that support the wellbeing and safety of our customers.

An example of some of the services and arrangements available to support tackling hate crime are detailed below.

6.1 Prevention and Early Intervention Activity

Prevention and early intervention activity is key to effectively tackling hate crime across all our communities, by making our position clear that the behaviour is inexcusable and there is no place for it within our communities.

Targeted responses to address the issues highlighted could take a number of forms including:

- Identification of trends and/or areas of concern;
- Joint visits between Police Scotland and Housing Officers;
- Deployment of the CIP team for an agreed time period for targeted activity;
- Provision of services and safety products;
- Community Engagement events planned and delivered with our strategic and third sector partners;
- Multi-agency partnership meetings to discuss and agree planned interventions; and
- Targeted consultation events with affected individuals and representative groups.

Development of a Communications Strategy will be an integral part of our prevention and early intervention activity. We will use a variety of communications to raise awareness of hate crime and convey our message that any form is intolerable and will be dealt with by the Group in a direct and robust manner.

By defining the issue and highlighting it to both victims and perpetrators and working with our local communities to help address it through frequent and sustained activity, it is hoped this will help mitigate against it. This will happen through outlining our position that we will deal robustly with hate crime to help continue to foster positive, inclusive, and welcoming communities for all.

6.2 Partnership Working

Tackling hate crime cannot be undertaken in isolation and requires a multi-agency approach to achieve the best outcomes for those impacted. We have established partnerships with Police Scotland hate crime specialist officers and teams and with Local Authority personnel with specific hate crime responsibility within their profile, to ensure as an organisation we are well connected and able to develop our processes and policy in collaboration with partners with expertise in this area. These partnerships also ensure we're fully aware of all available support and services for victims of hate crime, to ensure referral pathways are established to obtain the best possible outcomes for our customers.

6.3 Housing Options and Solutions

We have a well-established housing options and solutions model that is designed to identify vulnerability at the earliest opportunity. This was taken to the next level of customer service with the launch of MyHousing in October 2018.

The housing options approach allows us to explore a customer's housing situation and whether it remains the best option and most suited to their circumstances. If a customer is a victim of hate crime and they express wishes to explore their housing situation as a result, we can utilise the housing options and solutions model to explore this with the customer. We would do so with full awareness of all wraparound supports available to support with tenancy sustainment.

We recognise that there are situations where it may not be safe or preferable for customers to remain in their current accommodation following experience of hate crime. In these situations, we will work with all relevant partners to utilise our housing options model, to find the most appropriate and safe solution for that customer.

7. How we will know we are making an Impact on our Customers Lives and in our Communities

We will know we are making a positive impact on our customers' lives and our communities when:

- Our communities are safer and more tolerant places for all to live, with all of our customers, especially the most vulnerable, protected from hate crime and discrimination;
- Our staff are confident in dealing with all aspects of hate crime, being alert to the signs and knowing when to make a report of hate crime to Police Scotland;
- Our Third Party Reporting Centres are being used for the purposes of reporting a hate crime and our customers feel confident in doing so;
- We have appropriate referral pathways in place ensuring our customers are getting the right support at the right time; and
- We are realising the vision and outcomes contained within our Your Home, Your Community, Your Future Strategy.

8. Legislation and Strategic Drivers

Legislation

This policy has been developed taking into account the legislation and guidance relevant to areas of hate crime as follows:

- Race: Public Order Act 1986;
- Race: Crime and Disorder Act 1998;
- Race: Criminal Law (Consolidation) (Scotland) Act 1995, Section 50A;
- Religion: Criminal Justice (Scotland) Act 2003;
- Disability, sexual orientation and transgender identity: Offences (Aggravation by Prejudice) (Scotland) Act 2009;
- Gender Recognition Act 2004;
- Equality Act 2010;
- General Data Protection Regulation (Regulation (EU) 2016/679);
- The Data Protection Act 2018; and
- Hate Crime & Public Order (Scotland) Act 2021*

*The Hate Crime & Public Order (Scotland) Act 2021 has been passed as law; however, development of the legal framework is still in progress and it has not yet been implemented. It is anticipated that the Law will come into force in early 2024 and will supersede many of these previous laws for hate crime. This policy will be updated to reflect these changes when the official implementation date is set.

Strategic Drivers

The Hate Crime Strategy for Scotland was launched in March 2023 and sets out how the Scottish Government and Police Scotland plan to work together to build on the existing work to date to prevent and tackle hatred and prejudice in Scotland. The vision is for a Scotland where everyone lives free from hatred and prejudice and communities are empowered, included and safe.

9. Policy Review & Consultation

We will review this policy every three years. Reviews will consider legislative, performance and good practice changes.

More regular reviews may be considered where, for example, there is a need to respond to new legislation / policy guidance or any recommendations from Scottish Government or other statutory bodies.

We have developed this policy in consultation with key stakeholders, including our Different Together Community of Excellence and our staff networking groups including the LGBTQ+ and Disability and Neurodiversity groups. This is alongside the Protecting People and Communities Community of Excellence and our colleagues from within the Community Improvement Partnership. Externally we have engaged with stakeholders from Police Scotland and the Local Authority hate crime lead for Glasgow City Council.

Similar consultation will take place for all proposed policy reviews. Policy reviews will also include a review of the accompanying Equality Impact Assessment.

10. Support, Procedures, Awareness and Training

All staff will be made aware of the existence of this policy, their responsibilities, and the benefits of this policy for supporting our customers. This will help us to protect some of the most vulnerable people in our communities from falling victim to hate and prejudice.

We will reinforce to staff that a robust approach is in place to deal with hate crime. If they themselves become the victim of a hate crime, the Group Unacceptable Actions Policy will be enforced, and staff can be supported through our W.E. Benefit Scheme including PAM ASSIST (our Group Employee Assistance Programme) and our bespoke counselling service.

In collaboration with Police Scotland, we have designed bespoke hate crime training for our staff in the form of an e-learning module, which is used to upskill our staff. The training outlines how to recognise and respond to hate crime and covers Third Party Reporting, to ensure staff are fully familiar with this process and adequately placed to support any customers wishing to use this mechanism to report hate crime.

Our Third-Party Reporting Centre staff receive specialised training, which ensures any customers wishing to report a hate crime in this way can do so confident that our staff are both knowledgeable and professional and possess a clear understanding of the hate crime reporting process.

Raising awareness to customers; including highlighting the existence of hate crime, the adverse effect it can have; and essentially highlighting the tools in which both our Group and partner organisations/agencies have to deal with it, is a key factor in dealing with the issue. Our communications strategy will be integral to this, as will the support and services provided by the Community Improvement Partnership.

We will continue to consult with customers and local groups through a variety of channels and engage directly with our communities to provide any support they require around training and insight.

Where skills gaps are identified, training by external partners and key internal personnel will be provided for hate crime awareness, throughout our network of Academies.

Clear leadership and accountability mechanisms will be established, these will be complemented with robust governance arrangements.

11. Performance, Monitoring and Reporting

All incidents of hate crime are recorded on our ASB recording system and designated Category A status. Our ASB incident management system allows frontline staff to fully capture the hate crime incident from report until resolution and gives functionality to record all contact and action taken throughout, as well as detailing the prescribed support and enforcement action taken on the case.

We use the data available from Police Scotland and our ASB recording system to build a richer picture of hate crime occurring within our communities to support targeted intervention and capture softer outcomes around people feeling safer within their homes and communities through delivery of our wraparound support services.

12. Confidentiality and Data Protection

In certain circumstances and subject strictly to conditions set out in the Data Protection Act 2018, General Data Protection Regulations and any other applicable data protection legislation, personal information may be shared by the Group with other organisations and partners. Before the Group can share personal information, it must consider all of the legal implications of doing so, not simply the terms of the applicable legislative requirements. Appendix 2 of the Group Data Protection Policy must be considered.

Once a decision has been made as to whether or not information should be shared, that decision must be recorded, together with the reasoning behind that decision. Where a decision was taken to share the information, this will be on a “need to know” basis and an audit trail must be kept.

Staff members must consult Group Data Protection Policy and if in doubt, seek advice from the Group Information Governance Team.

13. Complaints

Our aim is to get it right first time, however, where there is dissatisfaction with this policy or its operation, customers can make a complaint.

A summary of our Group Complaints Policy and Procedure is available on our Group and subsidiary websites.

Appendix 1

Hate Crime Strategy for Scotland – Vision, Aims and Commitments

Our Vision and Aims

Our vision is for a Scotland where everyone lives free from hatred and prejudice.

