



Halton
Housing

Policy

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1. Introduction

- 1.1. Halton Housing is committed to providing quality homes and services to our customers and ensuring that customers are treated fairly and with respect when delivering those services. It is important that our colleagues are also treated fairly and with respect, when delivering those services.
- 1.2. Unfortunately, sometimes the behaviours and actions of customers can make it difficult for us to deal with enquiries, service requests or complaints. It can put unnecessary or unreasonable demand on our services or, in a small number of cases, can be abusive or offensive towards our colleagues.
- 1.3. This policy aims to address instances of unacceptable behaviour in a fair and transparent way. We understand that customers may act differently in times of trouble or distress, and we will always take an empathetic and supportive approach when customers approach us for help.
- 1.4. This policy explains how we will approach situations involving unacceptable behaviour and applies to all methods of contact including telephone, face-to-face, letters, e-mails, social media and other digital channels.
- 1.5. We will not take a blanket approach to dealing with unacceptable behaviour and will ensure that we consider each case individually and carefully before taking any action. Please also see our Talk to Us Policy.

2. Policy statement

- 2.1. We have developed this Unacceptable Behaviour Policy, which is designed to be accessible, fair to customers and easy to understand.
- 2.2. In implementing the Policy, we will have due regard to any relevant regulatory standards, as well as our own policies on Diversity and Customer Care.
- 2.3. The Director of Customer Experience is responsible for the implementation of this policy.
- 2.4. Heads of Service will be responsible for ensuring that all employees within their teams are aware of and are appropriately trained in our Policy and Procedures for dealing with unreasonable behaviour.

Examples of unacceptable behaviour

- 2.5. Unacceptable behaviour can vary in each situation, it does not have to be abusive or aggressive to be considered unacceptable. Sometimes unacceptable behaviour can put excessive or unnecessary demands on our service that prevents us from being able to help and support those displaying unacceptable behaviour and other customers that require our services.

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- 2.6. We will always judge each instance individually but below are some examples of behaviour that we consider to be unacceptable.
- 2.7. **Aggressive or abusive behaviour** - this is not just limited to actual physical or verbal abuse but can include derogatory remarks, rudeness, inflammatory allegations, and threats of violence.
- 2.8. **Discriminatory behaviour** - unfair treatment of colleagues based on characteristics such as race, gender, age, or sexual orientation.
- 2.9. **Harassment** - behaviour that demeans, humiliates, and intimidates a person.
- 2.10. **Unreasonable demands** - requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another.
- 2.11. **Unreasonable persistence** - refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to, or changing the subject matter of a complaint.
- 2.12. **Unreasonable levels of contact** - letters, calls, emails or contact via social media (this could include the frequency of contact as well as the volume of correspondence received as well as the frequency and length of telephone calls).
- 2.13. **Unreasonable refusal to co-operate** – this can include refusing to provide further details, evidence, clarity, or a summary of the concerns raised, or not co-operating with our policies and procedures (see Links to Strategies, Policies and Associated Documents).
- 2.14. **Abuse of social media** – this can include contacting staff using their personal details or personal social media accounts and publishing personal and confidential information about staff online.

Aggressive, abusive or discriminatory behaviour

- 2.15. We understand that customers may feel upset and angry about issues they have raised with us. However, we will not tolerate behaviour that escalates to escalates into abuse, violence, aggression, or discrimination towards our colleagues.
- 2.16. Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether verbal or written) that may cause staff to feel offended, afraid, threatened or abused.
- 2.17. Unacceptable language is that which:
- is offensive, derogatory, or patronising
 - is discriminatory in any way, including racist, sexist, homophobic or transphobic comments

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- makes serious allegations that individuals have committed criminal, corrupt, or perverse conduct without any evidence
 - any comments which may be regarded as a hate crime
- 2.18. We may decide that examples of the above aimed at third parties and not Halton Housing, are unacceptable because of the effect that listening or reading them may have on our colleagues.
- 2.19. Threats against employees will be taken very seriously and if employees feel scared or threatened at any point during a conversation with a customer, the interaction may be appropriately ended by our colleagues at any time. We may also inform the Police or consider legal action in some instances.

Harassment

- 2.20. Employees of Halton Housing have the right to carry out their duties free from harassment or threats of harassment. We ask all customers to respect that employees are delivering services and communicating decisions on behalf of Halton Housing and therefore this may not reflect their own views or preferences.
- 2.21. Examples of behaviours we consider to be harassment against our staff include:
- recording telephone discussions and publishing the information online such as through YouTube, Vimeo, Facebook, Instagram, or Twitter.
 - contacting staff using their personal details or social media presence such as Facebook, Instagram, Twitter, or LinkedIn.
 - publishing personal, sensitive, or confidential information about staff online or other public domains such as noticeboards or newsletters.
 - behaviour towards our staff that makes them feel intimidated or offended.
- 2.22. A Customer Code of Conduct has been published, outlining expected behaviours to protect our employees.

Unreasonable demands and persistence

- 2.23. A demand can become unreasonable when it has or would have a significant impact on our ability to deliver our services. Examples of unreasonable demand include.
- requested large volumes of information that are not relevant, necessary, or appropriate to provide.
 - asking for or expecting responses within a short space of time.
 - refusing to speak with or deal with a specific individual or requesting to only deal with a specific individual.
 - repeatedly changing or adding to request or issue raised, or repeatedly raising issued that have already been addressed.

Unreasonable levels of contact

- 2.24. Sometimes the volume and frequency of contact from customers can place an unnecessary strain on resource and impact on our ability to deliver services. This could happen over a brief period, for example several repeat calls within the space of a few hours or over a longer period, where colleagues are inundated with emails, calls, etc. making it difficult for them to respond.
- 2.25. We consider the level of contact to be unreasonable when it impacts on our ability to respond or deliver services to our customers.

Unreasonable refusal to co-operate with reasonable requests

- 2.26. When a customer raises a service request, issue, or complaint we need them to work with us so that we can deal with them effectively.
- 2.27. This includes.
- providing as much information as possible about the request or issue raised.
 - provide us with further information, evidence, or comments as requested.
 - respond to our contact or questions to help with our understanding.
- 2.28. If customers repeatedly refuse to co-operate this makes it difficult for us to respond and can also put an unnecessary strain on resource or services. We will always support customers if they have genuine difficulty complying with requests.

Abuse of social media

- 2.29. Social media is an important channel of communication for Halton Housing and our customers, and we use it to share information relevant to customers and stakeholders. Our channels encourage engagement and comment; but this can sometimes be abused or used inappropriately.
- 2.30. Examples of use of social media that we consider unacceptable are:
- contacting colleagues using their personal details or personal social media accounts.
 - publishing personal or confidential information about colleagues online
 - making abusive, offensive, inflammatory, or discriminatory comments or accusations about colleagues online.
 - persistently and/or excessively posting derogatory or inflammatory comments on Halton Housing social media posts.
- 2.31. Halton Housing is not responsible for comments made by third parties on our channels and reserves the right to delete or hide offensive posts to limit offence to visitors to our social media accounts. We also reserve the right to block persistent offenders who post inappropriate comments on our channels.

2.32. Colleagues at Halton Housing have received social media guidance and training to ensure that these principles are also applied by our colleagues.

Managing unacceptable behaviour

2.33. We will ensure that all customers are treated in a professional, courteous, fair, and consistent manner. We will ensure that all complaints are investigated in accordance with our TalktoUs policy and Procedure.

Reasonable adjustments

2.34. We will always consider the context of any behaviour when considering whether it is unacceptable and any appropriate steps to take. We will consider each customer's individual circumstance and needs to ensure that any action taken is appropriate and proportionate.

2.35. We understand that some of customers require additional support and may find it difficult to express themselves or communicate effectively, especially when they are anxious or upset. To help, we ask that customers try to explain what adjustments they require.

2.36. More information can be found in our Talk to Us Policy.

2.37. Examples of reasonable adjustments we can consider are:

- using different methods of communication including home visits.
- providing written communication in large print, braille, or translation.
- consider whether any support can be provided to the customer for example by family members, friends, or support workers.

Action we may take

2.38. Before taking any action, we will always inform customers respectfully that we consider their behaviour to be unacceptable and support them to moderate their behaviour wherever possible.

2.39. We will explain why we consider their behaviour to be unacceptable and ask them to moderate their behaviour, being clear about how they can do that e.g. reduce the volume of emails they are sending through or allow us sufficient time to respond.

2.40. If there is no change in behaviour, below are some of the actions that we may take depending on the nature of the behaviour and individual customer circumstances.

- place limits on the number and duration of contacts with colleagues in a specified time e.g. day, week, or month.
- limit the channels of contact, for example, telephone, letter, or email.

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- allow contact only through a third party for example family member, friend or support worker or advocate.
 - cease responding to a specific issue or complaint that has already been discussed, addressed, or investigated. Advising customers that any further correspondence will be noted, kept on record but not responded to. We will also advise of any appropriate next steps they may take, for example escalation to the Housing Ombudsman.
 - appointing a single point of contact (SPOC). All correspondence with Halton Housing would have to be made via the SPOC who will remain in regular contact with the customer at agreed intervals to ensure that we can support our customer appropriately and they are still able to access our services. If a customer has an emergency outside of office hours, they will still be able to reach us in the normal way.
 - allowing face to face contacts to only take place in the presence of a witness and in a suitable location.
 - restricting access to our premises
 - blocking individuals from responding to our social media posts
 - asking the customer to enter into an agreement about their conduct.
- 2.41. Any restrictions that we impose on a customer will be appropriate and proportionate.
- 2.42. In most cases, restrictions will apply between 3 and 6 months, in extreme or repeat cases this could be longer.
- 2.43. Any action taken needs to be agreed with either Head of Customer Support Services or Head of Neighbourhoods.
- 2.44. The decisions to impose such restrictions will always be confirmed in writing and will confirm:
- why we have taken the decision with given evidence and examples to support.
 - the specific action being taken (see above)
 - the duration of the restriction
 - whether the action applies to all the customers dealings with us, or whether the action specifically relates to the issue in question.
 - the review process of this policy; and the right of the customer to contact the Housing Ombudsman
 - how and where to report any emergency incidents
- 2.45. A copy of this policy will be enclosed with the letter.
- 2.46. A record of the action will be placed on our Customer Relationship Management system to inform colleagues of the decision, where appropriate, so that there is a consistent and co-ordinated approach is taken across the organisation.

Urgent or Extreme Cases

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- 2.47. Consideration should be given to whether we should take further action. This may include involvement of the police or legal action, where it is believed the complainant has committed a criminal offence, such as harassment, assault on staff or criminal damage.
- 2.48. A marker may be placed on our Customer Relationship Management system if a customer is violent or aggressive.

Operating the policy

- 2.49. The decision must be recorded on the Customer Relationship Management system and must be supported by the following information:
- grounds for applying the policy with any supporting evidence.
 - any restrictions to be applied, including scope and detail.
 - date for review – typically after six months and not longer than 12 months, but in exceptional cases this may be extended. In such cases the restrictions would be reviewed on a quarterly basis.

3. Regulatory and/or Legal Compliance

- 3.1. This Unacceptable Behaviour Policy ensures compliance with The Housing Ombudsman's Complaint Handling Code 1st April 2022, revised April 2024.

4. Diversity Considerations

A Equality Impact Assessment Stage 1 and Stage 2 has been completed for this policy.

5. Links to Strategies, Policies and Associated Documents

- 5.1. The following documents are linked to this Policy.
- Compensation and Goodwill Policy
 - Talk to Us Policy
 - Social Media Guidance
 - Customer Code of Conduct
 - Employee Code of Conduct
 - Anti-Social Behaviour and Hate Crime Policy
 - Customer Engagement Policy
 - Data Protection Policy
 - Property Pool Plus (Allocations) Policy
 - Diversity Policy
 - Single Equality Scheme
 - Housing Ombudsman Complaint Handling Code & Self-Assessment form
 - Translation & Interpretation Services – Briefing Note



Translations available on request by phoning 0303 333 0101 or
via email at info@haltonhousing.org

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