



UNACCEPTABLE ACTIONS POLICY

Approved/last reviewed by Management Committee: 24/07/2019

Date due for review: July 2022

The information in this document is available in other languages or on tape/CD, in large print and also in Braille.
For details contact the Association on 0141 578 0200 or e-mail: admin@hillheadhousing.org

本文件所載資料備有中文 (廣東話) 版本，也可以製成錄音帶/光碟，以及利用特大字體和凸字印製，以供索取。
欲知有關詳情，請聯絡本協會，電話：0141 578 0200，或向我們發送電郵，電郵地址：
admin@hillheadhousing.org

Tha am fiosrachadh anns an sgrìobhainn seo ri fhaotainn ann an Gàidhlig no air teip/CD, sa chlàr mhòr agus cuideachd ann an Clò nan Dall.
Airson tuilleadh fiosrachaidh, cuiribh fios dhan Chomann air 0141 578 0200 no cuiribh post-dealain gu: admin@hillheadhousing.org

इस दस्तावेज़ में दी गई जानकारी हिन्दी में भी या टेप, सी डी, बड़ी छाप और ब्रैल में भी उपलब्ध है। विवरण के लिए ऐसोसिएशन को नम्बर 0141 578 0200 पर या ई-मेल के द्वारा सम्पर्क करें : admin@hillheadhousing.org

ਇਸ ਦਸਤਾਵੇਜ਼ ਵਿਚ ਦਿੱਤੀ ਗਈ ਜਾਣਕਾਰੀ ਪੰਜਾਬੀ ਵਿੱਚ ਵੀ ਜਾਂ ਟੇਪ, ਸੀ ਡੀ, ਵੱਡੀ ਫੁੱਲਾਈ ਅਤੇ ਬ੍ਰੈਲ 'ਤੇ ਵੀ ਉਪਲਬਧ ਹੈ। ਵੇਰਵੇ ਲਈ ਐਸੋਸਿਏਸ਼ਨ ਨੂੰ ਨੰਬਰ 0141 578 0200 'ਤੇ ਜਾਂ ਈ-ਮੇਲ ਰਾਹੀਂ ਸੰਪਰਕ ਕਰੋ : admin@hillheadhousing.org

اس دستاویز میں درج معلومات اردو زبان یا ڈی وی ڈی، بڑی طباعت اور بربیل میں بھی دستیاب ہیں۔
تفصیلات کے لئے ایسوسی ایشن سے ٹیلیفون نمبر 0141 578 0200 یا ای میل admin@hillheadhousing.org کے ذریعے رابطہ قائم کریں۔

Regulatory Compliance	Standard 2 - The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities. 2.1. The RSL gives tenants, service users and other stakeholders information that meets their needs about the RSL, its services, its performance and its future plans.
Financial Impact	Low
Risk Assessment	Low

1. INTRODUCTION

- 1.1 Hillhead Housing Association 2000 seeks to be a caring, efficient and responsive landlord, undertaking our activity in an open and accountable fashion. The vast majority of those we come into contact with appreciate our efforts and recognise the constraints under which we operate. Occasionally, the behaviour or actions of individuals make it difficult for us to deal with them. This policy sets out how the Association will respond to those whose actions or behaviour we consider unacceptable.
- 1.2 We believe that all customers have the right to be heard, understood and respected. In a small number of cases however, their actions can become unacceptable because they involve abuse of our staff or our processes. When this happens, we will take action to protect our staff, as we must consider the impact of such behaviour on our ability to do our work and provide a service to others.
- 1.3 The term customer includes anyone acting on behalf of a customer or who contacts our office in connection with a housing association matter. Furthermore, for the purpose of this policy, the term staff includes direct employees of the Association as well as its Management Committee members, contractors, consultants and agents.

2. POLICY AIMS

- 2.1 To make it clear to all customers, both at initial contact and throughout their dealings with Hillhead Housing Association, what the Association can or cannot do in relation to their complaint or enquiry. In doing so, we aim to be open and not raise hopes or expectations that cannot be met.
- 2.2 To deal fairly, honestly consistently and appropriately with all customers, including those whose actions we consider unacceptable. While we believe that all customers have the right to be heard, understood and respected, we also consider that the Association's staff and management committee members have the same rights.
- 2.3 To provide a service that is accessible to all customers. We retain the right, however, where we consider customer actions to be unacceptable, to restrict or change access to our service.
- 2.4 To ensure that other customers and the Association's staff and management committee members do not suffer any disadvantage from customers, who act in an unacceptable manner.

3. DEFINING UNACCEPTABLE ACTIONS

3.1 People may act out of character in times of trouble or distress. There may have been upsetting or distressing circumstances leading up to an approach to our office. We do not view behaviour as unacceptable just because a customer is forceful or determined. In fact, we accept that being persistent can be a positive advantage when pursuing an enquiry or complaint. However the actions of customers who are angry, demanding or persistent may result in unreasonable demands on our office or display unacceptable behaviour towards staff or management committee members. It is these actions that we consider unacceptable and aim to manage under this policy. These actions are grouped under three broad headings:

➤ Aggressive or Abusive Behaviour

While we understand that a customer may be angry about the issues raised, if that anger escalates into aggression towards staff, we consider that unacceptable. Any violence or abuse towards staff will not be tolerated.

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.

We will judge each situation individually and appreciate individuals who come to us may be upset. Language which is designed to insult or degrade, is racist, sexist or homophobic or which makes serious allegations that individuals have committed criminal, corrupt or perverse conduct without any evidence is unacceptable. We may decide that comments aimed not at us but at third parties are unacceptable because of the effect that listening or reading them may have on our staff.

We expect our staff to be treated courteously and with respect.

➤ Unreasonable Demands

Customers may make what we deem to be 'unreasonable demands' through the amount of information they seek, the nature and scale of service they expect or the number of approaches they make. What amounts to unreasonable demands will always depend on the circumstances surrounding the behaviour and the seriousness of the issues raised by the customer.

Examples of actions grouped under this heading include:

- repeatedly demanding responses, within an unreasonable timescale,
- insisting on seeing or speaking to a particular member of staff when this is not possible,
- continual phone calls, letters or emails, and
- repeatedly changing the substance of a complaint or raising unrelated concerns.

We consider these demands as unacceptable and unreasonable when they start to impact substantially on the work of the office, such as taking up an excessive amount of staff time to the disadvantage of other customers or functions.

➤ Unreasonable Levels of Contact

Sometimes the volume and duration of contact made by an individual can cause problems. This can occur over a short period, for example, a number of calls in one day, or it may occur over a longer timeframe, when a customer repeatedly visits the office, makes long telephone calls or inundates us with information already provided or irrelevant to the issue.

We consider that the level of contact has become unacceptable when the amount of time spent talking to a customer or responding to, reviewing and filing e-mails/ correspondence impacts on our ability to deal with that complaint/enquiry or with other duties/responsibilities.

We recognise that some customers will not or cannot accept that the Association is unable to assist them further or provide a level of service other than that already provided. Customers may persist in disagreeing with the action or decision taken, in relation to their complaint or contact the office persistently about the same issue.

Examples of actions grouped under this heading include:

- persistent refusal to accept a decision made in relation to an enquiry or complaint,
- persistent refusal to accept explanations relating to what the Association can or cannot do, and
- continuing to pursue a complaint without presenting any new information.

The way in which these customers approach the office may be entirely reasonable, but it is their persistent behaviour in continuing to do so that is not.

We consider the actions of persistent customers to be unacceptable when they take up what the Association regards as being a disproportionate amount of time and resources.

4. MANAGING UNACCEPTABLE ACTIONS

- 4.1 In practice, there are relatively few complainants whose actions we consider unacceptable. How we manage such actions will depend on their nature and extent. We will, however, take action when unreasonable behaviour impairs the functioning of our office and adversely affects our ability to do our work and provide a service to others.
- 4.2 The threat or use of physical violence, verbal abuse or harassment towards Association staff or management committee members, is likely to result in the termination of all direct contact with the customer. Incidents may be reported to the police. This will always be the case if physical violence is used or threatened.
- 4.2 We will not deal with correspondence (letter, fax or electronic) that is abusive or contains allegations that lack substantive evidence. When this happens, we will tell the customer that we consider their language offensive, unnecessary and unhelpful. We will ask them to stop using such language and state that we will not respond to their correspondence, should they persist. We may require further contact to be through a third party
- 4.3 We will end telephone calls if the caller is considered aggressive, abusive or offensive. The person taking the call has the right to make this decision, tell the caller that the behaviour is unacceptable and end the call, if the behaviour persists.
- 4.4 In extreme situations, we will advise the customer in writing that they have been placed on a 'no personal contact' list. This means that we will limit contact with them to either written communication or through a third party.
- 4.5 Where a complainant repeatedly phones, visits the office, sends irrelevant documents or repeatedly raises the same issues, we may decide to:
 - only take telephone calls from the customer, at set times on set days,

- restrict contact to a nominated member of staff, who will deal with all future calls or correspondence from the customer,
- see the customer by appointment only i.e. require the customer to see a named member of staff, at an agreed time, arranged in advance. Where appropriate, this may require more than one member of staff to be in attendance,
- restrict the complainant to written contact,
- return any documents to the complainant or, in extreme cases, advise the complainant that further irrelevant documents will be destroyed, and
- take any other action that we consider appropriate. We will, however, always tell the customer what action we are taking and why.

While contact may be restricted, we will maintain at least one form of contact, in order to allow a complaint to progress through our complaints process.

- 4.6 Where a customer continues to correspond on a wide range of unrelated issues, and this action is considered excessive, then the customer is told that only a certain number of issues will be considered in a given period and asked to limit or focus their requests accordingly.
- 4.7 Customer action may be considered unreasonably persistent if all internal review mechanisms have been exhausted and the customer continues to dispute decisions regarding their enquiry or complaint. The customer is told that no future telephone calls will be accepted or interviews granted concerning this matter. Any future contact by the customer on this issue must be in writing. Such correspondence will be read and filed, but only acknowledged or responded to, if the customer provides significant new information relating to the enquiry or complaint or raises a new unrelated complaint.

5. RESTRICTING CONTACT

- 5.1 Hillhead Housing Association staff who directly experience aggressive or abusive behaviour, from a customer, have the authority to deal immediately with that behaviour, in a manner they consider appropriate to the situation, in line with this policy.
- 5.2 With the exception of such immediate decisions taken at the time of an incident, decisions to restrict contact with the Association will only be taken after careful consideration by the Director, having fully reviewed the matter with the appropriate staff member(s).

Wherever possible, we will give the customer the opportunity to change their behaviour or action before a decision is taken.

Where a decision has been made to restrict contact, the customer will be advised in writing why the decision has been made, the restricted contact arrangements and, if relevant, the length of time that these restrictions will be in place.

A customer can appeal a decision to restrict contact. Should they do this, the Management Committee will only consider arguments that relate to the restriction, not to the complaint. The Management Committee may quash or vary the restriction, as they think fit, but will make their decision based on the evidence available to them. Further to their consideration, they will advise the customer, in writing, that either the restricted contact arrangements will apply or a different course of action has been agreed.

6. RECORDING AND REVIEWING DECISION TO RESTRICT CONTACT

- 6.1 We record all incidents of unacceptable actions by customers. Where it is decided to restrict customer contact, an entry noting this is made in the relevant file and on appropriate computer records, including tenancy files.
- 6.2 A decision to restrict customer contact may be reconsidered if the customer demonstrates a more reasonable approach. Senior Staff will review the status of all customers with restricted contact arrangements on a regular basis.

7. DATA PROTECTION

Hillhead Housing Association will retain all related data in line with its Data Retention Schedule and in line with its obligations under the current General Data Protection Regulation.

8. EQUAL OPPORTUNITIES

The Association will seek to ensure that in implementing this policy that no group, organisation or individual will receive less favourable treatment or be discriminated against regardless of their race, colour, ethnic or national origin, language, belief, age, sex, sexual orientation, gender realignment, disability, marital status, pregnancy or maternity. We will positively endeavour to achieve fair outcomes for all.

9. COMPLAINTS

Anyone who feels aggrieved by their treatment under this policy can ask for a copy of the Association's Complaints Handling Procedure which is available on the Association's website or from our office. Any tenant making a complaint will be advised of their right to complain to the Scottish Public Services Ombudsman.

10. REVIEW

This policy will be reviewed every three years, or earlier in line with good practice, to ensure it responds to any changing circumstances and that the policy aims are being achieved.