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	Providence Row Housing Association	VERSION: 1



PRHA Unacceptable Behaviour Policy

1. Introduction

This policy describes Providence Row Housing Association's (PRHA) approach to being responsive in dealing with customer behaviours that become unacceptable. PRHA believes that everyone has a right to be heard, understood and respected.

Occasionally, the behaviour or actions of customers who receive a service from us impacts upon our ability to deliver services effectively and to a high standard and may therefore be deemed unacceptable. This could involve abuse of our staff and contractors working on behalf of the association.


Under this policy we will treat customers fairly, honestly, consistently and appropriately and have due regard for an individual's current circumstances and vulnerabilities such as mental health issues and learning disabilities, recognising the impact that these can have on behaviours.

PRHA appreciates that there may be upsetting or distressing circumstances that lead to a customer's behaviour becoming unacceptable. We will not deem behaviour to be unacceptable without seeking to understand any relevant circumstances involved.

PRHA will not tolerate any form of violence or abuse towards our staff or unacceptable behaviour or actions that result in unreasonable or excessive demands on our service that may prevent our staff and contractors from carrying out their duties effectively.

This policy applies to all areas of our work and to all methods of contact including telephone, face-to-face, letters, e-mails and website communications.

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2. Policy Aims

The purpose of this Policy is:

- To define what behaviour from customers we consider to be unacceptable.
- To make every effort to ensure that our staff and contractors working on behalf of PRHA are able to carry out their duties safely without fear of discrimination or distress caused by unacceptable behaviour.
- To give a commitment to our staff and make it clear to customers that unacceptable behaviour by them will not be tolerated and will be dealt with robustly.
- To provide guidance when particular circumstances would mean that we would consider a decision to restrict or change access to our service.

3. Scope

The Unacceptable Behaviour Policy extends beyond our staff to Board Members, volunteers, contractors and other agents working on behalf of PRHA.

Our view is very clear that no one should be subjected to unacceptable behaviour when representing or working with or for PRHA.

4. Relevant Legislation


The Unacceptable Behaviour Policy is framed within the context of and complies with relevant legislation, which includes:

- a) The Equalities Act (2010)
- b) The Human Rights Act (1998)

5. Associated Internal Policies and Procedures

It will sometimes be necessary to refer to other policies and procedures when deciding what course of action to take under the unacceptable behaviour policy. This Policy should therefore be used in conjunction with other relevant PRHA policies and procedure, which include:

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- a) Anti-social behaviour Policy and Procedure
- b) Complaints Policy and Procedure
- c) Equality & Diversity policy
- d) Health & Safety at Work policy
- e) Lone Working Policy and Procedure
- f) Stress Management procedures (Stress at Work section of the Staff Handbook)

6. Equality and Diversity

PRHA will comply with the terms of our Equality and Diversity policy when dealing with incidents of unacceptable behaviour. We will take into account the individual circumstances of the staff member and the customer involved when investigating an incident and determine the most appropriate course of action.

No one will be unlawfully discriminated against because of their race, colour, ethnic or national origin, language, religion, belief, age, gender, sexual orientation, marital status, family circumstances, employment status, physical ability or mental health.

7. Definitions


For the purposes of this Policy, the term ‘customer’ refers to:

- a) Current or former PRHA residents and tenants
- b) Housing applicants
- c) Visitors to any property run by PRHA including Head office
- d) Friends, relatives, carers, advocates or a person or group acting on behalf of a customer or group of customers
- e) Elected members
- f) Suppliers and contractors
- g) Members of the general public.

For the purposes of this Policy, the term ‘staff’ refers to:

- a) Staff directly employed by PRHA
- b) PRHA Board Members
- c) Staff employed by contractors or suppliers to PRHA when they are working on behalf of PRHA

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- d) Any agent working on behalf of PRHA
- e) Any professional visitor or representative of a third party organisation within our premises, where they are carrying out their duties in relation to one or more PRHA tenant or service user
- f) Any person working with PRHA on a voluntary basis.

8. Policy Review

This Policy will be formally reviewed every three years in consultation with staff and customers to ensure the aims of the Policy are being met.

The Policy will form part of induction training for new staff.

9. Definitions of Unacceptable Behaviour

9.1 Unreasonable Behaviour:

Customers in some instances may pursue requests for information, make service requests, or raise complaints that are unreasonable in themselves, or are made in a manner that is unreasonable. Examples of this type of behaviour include:

- Refusing to specify the details of a complaint, despite offers of assistance.
- Changing the basis of a complaint/request as the matter proceeds.
- Denying or changing statements made at an earlier stage.
- Making unjustified complaints about staff who are trying to deal with an issue and requesting to have them replaced.
- Covertly recording meetings and conversations.
- Submitting falsified documents from themselves or others.
- Refusing to accept a decision; repeatedly arguing points with no new evidence.
- Persistently seeking an outcome which has already been explained as being unrealistic for policy, legal or other valid reasons.

9.2 Aggressive or abusive behaviour:

This type of behaviour includes physical, verbal or written behaviour which may cause staff to suffer harm, or to feel afraid, intimidated, threatened or abused.

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Examples of this type of behaviour include:

- Physical violence against a person.
- Physical violence against objects such as kicking, defacing or destroying property.
- Threats.
- Personal verbal abuse.
- Derogatory or insulting remarks.
- Persistent shouting.
- Persistent swearing.
- Unwelcome or rude gestures.
- Statements intended to or likely to cause offence,
- Unsubstantiated allegations.
- Sexist, racist, homophobic or any other discriminatory comments/abuse.

We will judge each situation individually and appreciate that individuals who contact us about an issue or concern may be upset. However while we accept that those who contact us may feel angry, it is not acceptable to shout or swear at PRHA staff, or to make threats.

Threats against staff will be taken very seriously and if staff feel scared or threatened at any point during a conversation with a customer, the interaction may be ended at any time.

9.3 Unreasonable demands and unreasonable levels of contact:

Customers may make what can be considered as unreasonable demands on our staff through the amount of information they seek, the scale of the service they expect, or the number of approaches, service requests, or complaints that they make regarding the same issue.

Sometimes the volume and duration of contact made by an individual may become unreasonable. This can occur over a short period, for example the number of calls being made, or emails being sent, to one or more PRHA staff member within an hour or a day. Or it may occur over a longer period where PRHA are working to respond to concerns that have been raised and where the customer is repeatedly making long telephone calls or sending frequent emails or other communications with no new or additionally relevant content.

We consider demands and frequency of contact to be unreasonable when they impact substantially on the work of staff, for example by taking up an excessive amount of time which is disproportionate to the issue. This is likely to disadvantage other customers as it can impact on the service that can be provided to them.

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Examples of this type of behaviour include:

- Demanding responses within an unreasonable timescale.
- Insisting on meeting with or speaking only to a particular member of staff.
- Making persistent phone calls or persistently contacting PRHA by other means.
- Repeatedly changing the substance of a complaint or raising unrelated issues.

We may advise the customer that we can only consider a certain number of issues within a given time period and ask them to limit or focus their request accordingly.

9.4 The use of social media to encourage aggression or abusive behaviour.

We consider the use of social networking sites and the internet to perpetrate or encourage aggression and/or abuse including any of the above types of behaviour towards our staff to be unacceptable behaviour. PRHA will consider any messages posted via social media or other internet based media, including email, in the same light as any written or spoken communication.

Where such messages are posted by individuals on PRHA's own social media sites, we may take action such as hiding or deleting a post, blocking the user's access to our social media accounts, and reporting posts to the social media platform. Where appropriate, we may also report such posts to the police or take alternative legal action.

9.5 Harassment

Staff have the right to carry out their duties free from harassment or threats of harassment. We ask all customers to respect that staff are delivering services and communicating with you as a representative of Providence Row Housing Association.

Examples of behaviours we consider to be harassment against our staff would include:

- Recording telephone discussions or meetings and making the recording or information available online via social media, video sharing sites or by any other means of sharing or publishing.
- Contacting staff using their personal details or via personal social media accounts they may have, such as Facebook, TikTok, Twitter, or LinkedIn.
- Publishing personal, sensitive or private information about staff online.
- Sharing personal, sensitive or private information about staff with other individuals, whether electronically (for instance via email, instant

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messaging, WhatsApp groups or other social or direct messaging media); or in hard copy/ printed format.

10. Aggressive or abusive behaviour

All incidents where physical violence is used or threatened will be reported to the police. Verbal abuse or harassment may also be reported to the police if it is sufficient to cause fear and alarm to a member of staff.

Customer correspondence that is abusive to staff or which contains unsubstantiated allegations of a serious nature will be dealt with by informing the customer in writing why we consider what they have written to be unacceptable. We will ask them to stop communicating in this way and advise that we will not respond to future abusive correspondence. If this behaviour continues we may apply any of the restrictions listed above.

We will end telephone calls if the caller is considered aggressive, abusive or offensive. All staff have the right to make this decision, they must tell the caller that the behaviour or language is unacceptable and end the call if the behaviour does not stop.

Our staff may also take a decision to end a call if it becomes apparent that the caller is covertly recording the conversation. Staff should first request that the customer ceases to record if they want the conversation to progress, or request confirmation from the customer that they are not recording. If the customer refuses to cease recording, or is suspected to be continuing to covertly record the interaction, the staff member should politely end the call.

11. Refusal to co-operate

When we are looking at a service request or a complaint, we will need to ask the customer who has raised their concerns to work with us in order to fulfil the service request or to investigate their concerns fully. This can include:

- Agreeing the specific nature of the service request or complaint that we will look at.
- Asking the customer to provide us with further information, evidence or comments.
- Summarising their concerns to ensure we are addressing the right issue.
- Agreeing the outcomes that are being sought in relation to the service request or complaint.

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Occasionally, customers can repeatedly refuse to co-operate, and this makes it difficult for us to investigate their complaints or issue effectively. We will always seek to assist a customer if they have a specific, genuine difficulty in complying with a request.

However, we consider it as unacceptable to bring a complaint to us and then not respond to clear and appropriate requests by staff in order for us to address their service request or investigate their complaint. Where we are unable to resolve or investigate an issue without the cooperation of the person raising that issue, we will formally write to notify them of this and to give them the opportunity to re-engage in relation to the issues they have raised.

12. Reasonable adjustments


We understand that some of our customers may find it difficult to express themselves or communicate clearly, especially when they are anxious or upset. PRHA will seek to understand any reasonable adjustments that would make it easier to access PRHA services. In order to do this, we may ask individuals to explain what adjustments they are looking for and how this will ensure they can access PRHA's services.

We will always consider making reasonable adjustments for a customer if we are asked to do so. Examples of adjustments that we can consider are:

- Using different methods of communication
- Communicating in different languages using the support of a translator.
- Providing written communication in large print, easy read, coloured text, or in translated text.
- Giving clear warnings if conversations become unproductive and allowing customers the opportunity to modify their behaviour before ending a call.
- Identifying alternate representation for a customer such as a family member, carer, advocate, support worker or other professional that can communicate in the best interest of the customer

However, we do not expect our staff to be subjected to aggressive, offensive threatening or abusive actions, language or behaviour. We may still use this policy even where a reasonable adjustment has been made if the actions or behaviours of an individual have a negative effect on our staff, our representatives, or our work.

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We will record and monitor the reasonable adjustments that have been requested and made. This will allow us to review the services we provide and help us identify whether there are any wider steps that we can take to improve our services.

13. Managing Unacceptable Behaviour

There are relatively few customers whose actions we consider unacceptable.

How we aim to manage these actions depends on their nature and extent. If it adversely affects our ability to do our work and provide a service to the customer or to others, we may need to restrict a customer’s contact in order to manage the unacceptable behaviour.

In all cases we will contact the customer to explain what actions we consider unacceptable and why, and explain what actions we will take if their unacceptable behaviour continues. Where we have to take action we will tell the customer in writing what action we are taking and why.

- We may offer to meet the customer to discuss the unacceptable actions and agree a way forward. It may be appropriate in some cases to engage external experts, such as independent mediators, to assist us in resolving a situation.
- We may advise the customer that we consider the issue(s) fully responded to and that continuing correspondence on the issue(s) would serve no useful purpose. In these circumstances future correspondence relating to the issue(s) will be noted and filed but will not be acknowledged or responded to unless it contains new significant information which we consider require action or response.

When we experience behaviour or demands that are considered to be unacceptable, we will consider taking appropriate actions which may include one or more of the following:

- Formally warn the customer about their behaviour and request that they moderate their behaviour in future contact with us.
- Appoint a single point of contact within PRHA for the customer.
- Confirm with the customer that we will only communicate with them in writing, or via an agreed representative.
- Decide not to investigate a complaint on the basis that it has been pursued in a way that is unacceptable. The customer will be formally

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notified of this and they will be provided with the contact details of the Housing Ombudsman so that our decision can be referred to them if they wish to do so.

- Temporarily stop all communication with a customer.
- In exceptional circumstances, notify relevant public authorities. This may be the case where serious threats have been made to PRHA staff; abusive language has been directed at staff which is discriminatory in any way (including but not limited to racist, sexist, homophobic or transphobic language); or where serious allegations are made that PRHA staff have committed criminal or corrupt conduct without evidence.

14. Decisions to restrict customer contact

With the exception of incidents where immediate action is required, decisions to restrict contact are only taken after careful consideration of the situation by a relevant manager. Wherever possible we will give a customer the opportunity to modify their behaviour or action before a decision is taken.

We aim to restrict contact in a way that allows the customer to continue receiving a service from us and continue to progress through any process they are currently involved in. We will aim to maintain at least one form of contact except in extreme situations where we will require all contact to be through a third party. This may be via a family member, carer or other agreed advocate suggested by the customer, or an appropriate independent third party such as a representative from a mediation service suggested by PRHA.


Staff who directly experience aggressive or abusive behaviour from a customer have the authority to deal with that behaviour immediately in a manner they consider appropriate to the situation and in line with this policy.

We will tell customers in writing why a decision has been made to restrict future contact, the restricted contact arrangements and the length of time that the restriction will be in place. We will also inform the customer of how to appeal the decision.

Any restrictions that are put in place will be for a set period, which will vary depending on the severity and impact of the behaviour (e.g. for one, three or six months). No indefinite restrictions will be put in place.

We will review the restrictions after the initial set period, and remove or reduce the restrictions in place if the behaviour has improved. If the behaviour has persisted the restrictions may be extended for another set period, followed by

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a further review. We will inform the customer of each review and decision in writing.

We will ensure relevant staff are informed of any restrictions put in place.

15. Logging and reviewing decisions to restrict contact

We will log all incidents of unacceptable actions and any key decisions taken to restrict customer contact. PRHA will not set restrictions indefinitely, a review period will be based on the customer's circumstances and level of unacceptable behaviour.

16. Right to appeal

A customer has the right to appeal against a decision to restrict contact or to undertake any of the actions outlined within this policy. The customer will be advised in writing about this right and the contact details of an appropriate senior staff member to whom their appeal should be addressed. The senior staff member will review the restrictions that have been put in place and will advise the customer in writing that either the restricted contact arrangements will remain in force or that a different course of action has been agreed.

At this stage we will advise the customer of their right to contact the Housing Ombudsman or other relevant independent organisation if they believe our decision to restrict contact is unjust.

17. Confidentiality

All personal data that customers or their representatives provide to PRHA will be processed in accordance with our data privacy notice that can be found on our website and in accordance with data protection laws (including the UK General Data Protection Regulation and the Data Protection Act 2018).

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