



Unacceptable behaviour policy

January 2022

Lead Officer: Becky Johns, Customer Experience Manager

Version no.	Purpose / Changes	Approval Date	Approved by	Suggested review date
V3.0	Health check	17/01/2022	Community Voice	March 2025
V2.0	Health check	09/11/2018	Heads of Service	November 2021
V1.0	New policy	13/07/2015	Community Voice	July 2018

Contents

		Page
1.	Our policy is...	2
2.	It applies to...	2
3.	Because we want to...	2
4.	We will...	2
5.	Making sure we do what we say...	6
6.	Other things to bear in mind...	6
7.	We'll look at this again...	6

1. Our policy is...

- 1.1 To deal fairly, honestly, consistently and appropriately with all customers, including those whose actions we consider unacceptable. We believe that everyone who approaches us has the right to be heard, understood and respected and that anyone who works for or on behalf of Ongo (our people) have the same rights.
- 1.2 To provide services that are accessible to all customers. However, we retain the right, where we consider a customer's actions to be unacceptable, to restrict or change such access.

2. It applies to...

- 2.1 All areas of the Ongo group including anyone carrying out work on our behalf.
- 2.2 All customers of the Ongo group. The term customer includes individuals acting on behalf of a customer or anyone who contacts someone who works for or on behalf of Ongo in connection with a complaint.

3. Because we want to...

- Set out our approach to the very few customers whose actions or behaviour we consider unacceptable
- Make clear what we consider to be unacceptable behaviour and what action we may take
- Ensure that other customers and our people do not suffer any disadvantage from customers who act in an unacceptable manner

4. We will...

4.1 Tell customers what we consider to be unacceptable actions

- 4.1.1 People may act out of character in times of trouble or distress. For example, there may have been upsetting or distressing circumstances leading up to a complaint. We do not view behaviour as unacceptable just because someone is challenging or determined. In fact, we accept that being persistent can, sometimes, be a positive advantage when pursuing a complaint.
- 4.1.2 The actions of customers who are angry, demanding, or persistent may result in unreasonable demands on, or unacceptable behaviour towards our people. It is these actions that we consider unacceptable and aim to manage under this policy.
- 4.1.3 We have grouped these actions under three broad headings:

Aggressive, slanderous or abusive behaviour

- Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether verbal or written (including via social media platforms) that may cause our people to feel targeted, afraid, threatened, or abused

- Examples of behaviours grouped under this heading include threats, physical violence, personal verbal abuse (including racial or other discriminatory language), derogatory remarks, and rudeness
- We expect our people to be treated courteously and with respect. We have zero tolerance when it comes to violence or abuse towards our people. Customers may be angry if they have cause to complain for example, but it is not acceptable if this escalates into aggression directed towards our people

Unreasonable demands

- Customers may make what we consider unreasonable demands on us through the amount of information they seek or provide, 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 demanding responses within an unreasonable timescale; insisting on seeing or speaking to someone specific (and only them), continual phone calls, emails, letters, or use of social media; repeatedly changing the substance of a complaint or raising unrelated concerns
- We consider these demands as unacceptable and unreasonable if they start to impact substantially on our work, such as taking up an excessive amount of our time to the disadvantage of other customers or functions.

Unreasonable persistence

- We recognise that some customers will not or cannot accept that we are unable to assist them further or provide a level of service other than that provided already. Customers may persist in disagreeing with and/or challenging the action or decision taken or contact us persistently about the same issue
- Examples of actions grouped under this heading include persistent refusal to accept a decision made in relation to a complaint, persistent refusal to accept explanations relating to what we can or cannot do, and continuing to pursue a complaint without presenting any new information
- An overload of letters, emails, calls or contacts via social media (this could include the frequency of contact and length of telephone calls) would also be an example of unreasonable persistence

4.2 Managing unacceptable actions by customers

4.2.1 How we manage instances of unacceptable behaviour depends on the nature and extent. The individual circumstances of the customer will always be taken into consideration. We will always be fair and reasonable and consider the Equality Act within our decisions.

4.2.2 We will always try and reach a voluntary (informal) arrangement before taking any formal action. This would be by asking the customer to adjust their behaviour during the contact or asking if there are any family, friends or third-party advocates that can act on their behalf to improve the situation. We will always seek voluntary

resolutions and, where appropriate, issue a written warning before any formal action is taken.

- 4.2.3 If a customer's behaviour adversely affects our ability to do our work and provide a service to others, we may restrict their contact with us in order to manage this. We may restrict contact in person, by telephone, letter or electronically or by any combination of these, but we will try to maintain at least one form of contact.
- 4.2.4 In extreme situations, such as the threat or use of physical violence, verbal abuse, or harassment towards our people, we may:
- a. Restrict contact with us to either written communication or through a third party. In this case, we will tell the customer in writing that their name is on a 'no personal contact' list
 - b. In the case of Ongo Homes customers, take appropriate action for breach of tenancy and pursue any legal remedies that can be taken in the civil courts under the Anti-Social Behaviour Crime and Police Act 2014
 - c. Report incidents to the Police if physical violence is used or threatened
- 4.2.5 We will not deal with correspondence or other forms of communication which is abusive to our people or that contains allegations that lack substantive evidence. When this happens we will tell the customer that we consider their language to be offensive, unnecessary, and unhelpful. They will be asked to stop using such language and told that we will not respond if they do not stop. We may require future contact to be through a third party.
- 4.2.6 Our people have the right to make the decision to end interactions (telephone calls, digital interactions or face to face meetings) if the customer is considered aggressive, abusive, or offensive. The individual dealing with the customer has the right to make this decision, they will warn the customer that the behaviour is unacceptable, and end the interaction if the behaviour does not stop.
- 4.2.7 When someone repeatedly makes contact with us, over the phone, digitally or in person visiting the office without an appointment, sends false, irrelevant or duplicate documents, or raises the same issues already considered, we may decide to put arrangements in place to effectively manage the situation. We will take action that we consider appropriate. We will always explain what action we are taking and why. We may:
- Only liaise with the customer at set times on set days, or put an arrangement in place for only one individual to deal with calls, digital interactions or any other correspondence from the customer in the future
 - Require the person to make an appointment to see a named individual before visiting the office, or that the customer only contacts the office digitally or in writing
 - Return the documents to the person or, in extreme cases, advise them that further irrelevant documents will be destroyed

- Block individuals on our social media platforms
- Take other action that we deem appropriate depending on the circumstances

4.2.8 When a customer continues to correspond on a wide range of issues, and is considered excessive, we will only consider those deemed as relevant and ask them to limit or focus their requests accordingly.

4.2.9 Customer action may be considered unreasonably persistent if all internal and external review mechanisms have been exhausted and the customer continues to dispute our or any Ombudsman's decision made in relation to a complaint. We will tell the customer that no future interactions, either over the phone or digitally, will be accepted or interviews granted concerning that complaint. If the customer insists in contacting us about the same issue, their communication will be read and filed, but only acknowledged or responded to if it provides significant new information relating to the complaint.

4.2.10 We will ensure customer information is kept confidential and we will comply with all relevant aspects of the Data Protection Act 2018 and General Data Protection Regulations (GDPR).

4.2.11 We will support our people to ensure they feel they can report any threats through our health and safety reporting system. The reports will be investigated and appropriate actions will be taken. We encourage our people to discuss with their team leaders and appropriate support will be given depending on the circumstances and the individual needs. Examples of support would be to take some time to reflect on the situation, accessing counselling services or adjusting duties for a period of time.

4.3 Deciding to restrict customer contact

4.3.1 Anyone who directly experiences aggressive or abusive behaviour from a customer when a complaint is still under consideration has the authority to deal immediately with that behaviour in a manner they consider appropriate to the situation and in line with this policy.

4.3.2 With the exception of such immediate decisions taken at the time of an incident, decisions to restrict contact with us are only taken after careful consideration of the situation by the Customer Experience Manager. Wherever possible, we will give a customer the opportunity to modify their behaviour or action before this decision is taken. Customers will be told in writing why a decision has been made to restrict future contact, the restricted contact arrangements and, if relevant, the length of time that these restrictions will be in place.

4.3.3 A customer can appeal a decision to restrict contact. The Customer Service Director will consider the appeal. They will advise the customer in writing either that the restricted contact arrangements still apply or that a different course of action has been adopted.

5. Making sure we do what we say...

5.1 We record all incidents of unacceptable actions by customers. Where it is decided to restrict customer contact, an entry noting this should be made in the complaint itself and on QL. The Customer Experience Manager should be notified to ensure all cases are logged and reviewed appropriately.

5.2 A decision to restrict customer contact may be reconsidered if the customer demonstrates a more acceptable behaviour. A Director (or their nominated deputy) will review the status of all customers with restricted contact arrangements at least every six months or on the prompt of the Customer Experience Manager.

6. Other things to bear in mind...

6.1 Our policies on complaints, anti-social behaviour and vulnerable people, data protection and equality, diversity and inclusion.

7. We'll look at this again...

7.1 In three years time or sooner if anything changes.