

Managed behaviour policy

1. Purpose of the managed behaviour policy

We strive to deliver an excellent and accessible service. We believe our residents have a right to be heard, understood and respected.

We expect our employees to treat people with courtesy, respect and fairness at all times, and for our employees to be treated in the same way.

Sometimes it is difficult to deliver services effectively where there is unacceptable behaviour towards our employees, or unreasonable demands on our service or levels of contact. We have to take action to protect the health and wellbeing of our employees who have a right to do their jobs without fear of being abused or harassed. We also consider the impact of the behaviour on our ability to do our work and provide a service to others.

This policy sets out how we will identify and manage these types of behaviours and actions and how we will communicate this to customers. It has been developed in line with our values:

- Passionate commitment to customers
- Respect for everyone
- Trusted to make the difference
- Pride in Team ISHA.

2. Scope of the policy

This policy is organisation wide, covering all areas of our work and all channels of contact. It also links to our values.

3. Policy statement

This policy is guided by our legal duties as a social landlord and aims to:

- clearly set out the types of behaviours we consider unacceptable and/or unreasonable
- give clarity on how unacceptable or unreasonable behaviour will be assessed, managed and communicated to customers
- set out when residents can ask for a reconsideration of a managed behaviour restriction and how reconsideration is undertaken

3.1. Reasonable adjustments

Some people that contact us have a mental or physical impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities (such as a disability). Where this applies, we may put in place reasonable adjustments to change the way we interact with them.

We will check whether a reasonable adjustment is required when you first contact us. At any stage where it is determined that a reasonable adjustment is required, it will be recorded on our housing management system.

We will always consider how any restrictions may impact a reasonable adjustment that has been put in place for a particular resident.

This may be necessary because the behaviour we are experiencing means the adjustment is no longer reasonable where the person has shown unacceptable or unreasonable behaviour towards our employees. This could be because that adjustment is no longer effective or practical. Where possible, we will prioritise selecting contact restriction(s) that provide an alternative way to access our service.

We will consider contact restrictions on a case-by-case basis and will always let the resident know of a decision to impose a contact restriction in writing.

The policy below sets out what types of behaviour we consider unacceptable or unreasonable, how this will be managed, and what residents can do if they believe a restriction should be reconsidered.

3.2. Behaviours that are unacceptable or unreasonable

Unacceptable behaviour

Sometimes people may be upset, angry, or anxious about the issues they have raised or a service they have received. We will always try to help but we will not accept aggressive, abusive or harassing behaviour towards our employees.

Examples of this type of behaviour can include:

- behaviour or language (verbal or written) that may cause employees to feel offended, afraid, threatened, or abused
- derogatory or discriminatory remarks; including racist, sexist, disablist, homophobic, or transphobic comments
- using insulting or degrading language
- making serious allegations against us or others without any evidence
- publishing information about employees online including social media
- recording and publishing telephone discussions with employees that are taken without their consent
- contacting employees using their personal details or social media presence such as Facebook, Instagram, X or LinkedIn

Unreasonable demands

Demands on our service can be unreasonable if they impact our ability to provide a consistent service, or if involves an excessive amount of employee time.

Examples of these type of demands can include:

- repeatedly demanding a response within a timescale outside of normal timescale agreements
- insisting on speaking with, or refusing to speak to particular employees when that is not possible or appropriate
- repeatedly changing the substance of a complaint or raising unrelated concerns
- refusing to accept a decision where explanations for the decision have been given
- refusing to co-operate by not providing information we request to allow us to help resolve the issue

Unreasonable levels of contact

Levels of contact become unreasonable when the amount of time spent managing it impacts our ability to process the complaint, service request or limits the service we can give to other people.

Examples of this type of contact can include:

- repeated contact whilst a complaint or service request is being progressed or after it is closed
- lengthy telephone calls repeating the same points for discussion
- high volumes of information provided by email, webform, or post where the information repeats what has already been given
- copying our employees into emails with other parties where this is not necessary
- adopting a “scatter-gun” approach – pursuing a complaint/enquiries/service requests with multiple departments and/or other parties eg Councillors, MPs, solicitors or the Housing Ombudsman Service.

3.3. How we will manage unacceptable or unreasonable behaviour

Where our employees experience unacceptable behaviour on a telephone call they may take immediate action to terminate the call where it is appropriate in the circumstances. Where possible, the employee member will inform the resident why their behaviour is unacceptable before deciding to terminate the call.

The following list sets out the contact restrictions we can impose to manage unacceptable or unreasonable behaviour:

- permitting access to a single point of contact only
- requesting communication only in writing or through a representative
- deciding not to investigate a complaint on the basis that it has been pursued in an unacceptable or unreasonable way
- drawing a line under closed complaints
- restricting or limiting contact
- limiting the number of issues that will be considered
- only responding on provision of new information or evidence, or further clarity on the issues being raised
- limiting access to our office
- requiring personal contact to take place in the presence of a witness.

The following list sets out additional actions we can take to manage unacceptable behaviour which threatens the immediate safety of our employees or other persons:

- notifying the emergency services
- reporting information shared on social media to platform moderators.

If we consider someone's behaviour is unreasonable (due to the demands made or levels of contact) or unacceptable, we will first try to fix the issue. We will explain why the behaviour is unreasonable or unacceptable and

will give the person an opportunity to stop the behaviour so we can continue to progress the case.

If we are unable to resolve the issue and decide there is a need to manage behaviour in line with our policy, this decision will be made by a senior colleague, of manager level or above. The contact restriction conditions and reasons for the contact restriction will be communicated to the customer in writing.

A managed behaviour restriction will usually be in place for 12 months and will be reviewed quarterly to determine whether it is still appropriate. It may be extended if the behaviour persists.

If behaviour threatens the immediate safety of our employees, other individuals, or an organisation, we will report the matter to the police.

We aim to let the resident know that we have reported their behaviour to police or local authority. There are some circumstances where this is not possible, such as a call being terminated before we have the opportunity to inform the person, or where informing the person could impact a criminal investigation.

A record of any managed behaviour restriction imposed will be kept on our case management system for the duration of the contact restriction. Once the case or cases are closed or the contact restriction expires, we will remove the information relating to the managed behaviour restriction in line with data protection rules.

Where a managed behaviour restriction is in place for longer than 12 months, a manager will review the restriction. As part of the review information will be checked, updated or deleted if it is no longer correct.

3.3. Reconsideration of a managed behaviour restriction

A resident can ask for a managed restriction to be reconsidered in any of the following circumstances:

- where there is a change in circumstances which mean the managed behaviour restriction is no longer appropriate
- where there is evidence the restriction impacts the resident's ability to access our service
- a factual error was made when making the decision to apply the restriction.

A senior colleague, of manager level or above will consider the reconsideration request and decide if any changes will be made to the managed behaviour restriction. The outcome of this will be communicated to the customer within 10 working days of their reconsideration request.