

## Doing it the right way: Managing unacceptable behaviour

### Policy Compliance Notes

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Related Policy	HG_GRP_CORP_184 Complaints, Compliments and Comments
Related Supporting Documents	Related policy compliance notes, procedures and other supporting documents can be found <a href="#">HERE</a>
Distribution	Internal: All colleagues via policy pages of Home World intranet External: Available on request to policy team and with agreement of policy owner
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**This document must be followed in order to fully comply with Home Group policies.**

This document should not be shared externally without permission from the document owner.

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The information in this document applies to colleagues working in all parts of the UK unless stated otherwise. Some sections have been marked with an England or Scotland flag to highlight information which is specific or relevant to that country.



**Important information is marked by this warning triangle.** This document may be updated at any time. Always refer to Home World for the latest version and avoid printing or saving your own copy

## 1. Introduction

Home Group is committed to upholding our customers' right to be heard, understood and respected. We make every effort to ensure we are open and accessible to everyone, including making reasonable adjustments to our services where needed.

As well as taking a fair and consistent approach to communicating with customers, we also recognise that certain behaviours may result in unreasonable demands on time and resources or unacceptable behaviour towards colleagues.

Our colleagues have the right to do their jobs without fear of abuse, harassment or unreasonable demands and we will use this policy to protect their wellbeing and safety.

We ask that all customers remember that Home Group colleagues are representing the organisation and the decisions and communications they send may not reflect their own views or preferences.

This policy compliance note sets out how we should manage situations when a customer's behaviour is unacceptable or unreasonable. It applies to all forms of customer contact with Home Group, including telephone, written, verbal, social media, emails and other digital channels and aligns with the Housing Ombudsman's guidance on handling acceptable behaviour.



Click [here](#) for Housing Ombudsman guidance on unacceptable behaviour  
Click [here](#) for the Scottish Public Service Ombudsman complaints handling practice guide Supporting respectful engagement: handling difficult situations

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## 2. What is unacceptable behaviour?

We recognise that behaviour is not unacceptable just because a person is assertive or determined. There may have been distressing circumstances leading up to a customer contacting Home Group and customers or their representatives may act out of character.

Behaviour may become unacceptable if it is so demanding or persistent that it places unreasonable demands on Home Group and impacts the level of service that can be offered to others.

Behaviour that is aggressive, abusive or harassing towards colleagues will also be considered unacceptable in accordance with our No Home For Hate charter.



Click [here](#) for the No Home For Hate charter.

Even though someone has behaved in an unacceptable or unreasonable way in the past, it does not mean that every contact from that person with Home Group will be unreasonable or need to be managed under the managing unacceptable behaviour process.



**You must consider each case on an individual basis.**

The Director of Scotland is currently responsible for determining whether a customer's behaviour meets our definition of unacceptable behaviour and making decisions about any action that should be taken to manage that behaviour. This applies to any cases of unacceptable behaviour occurring anywhere in the UK.

See below for more examples of unacceptable behaviour and the process for alerting the Director of Scotland to any cases that might need management action.



**Remember, it's the behaviour that's unacceptable, not the customer. You must stay professional and avoid personal comments or actions against the customer.**

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### 3. Examples of unacceptable behaviour

#### 3.1 Violence, aggression and verbal abuse

Violence (or threats of violence), aggressive behaviour, or verbal abuse towards Home Group colleagues will not be tolerated. Nor will the use of offensive language. It is not acceptable to shout or swear at Home Group colleagues. Behaviour of this nature may result in action being taken against the customer for breach of terms and conditions of their tenancy.

Whilst we respect and uphold everyone's right to hold and express views that others may strongly disagree with, we consider verbal abuse to include language that:

- is deliberately offensive, derogatory or patronising
- is discriminatory in any way, including racist, sexist, homophobic or transphobic comments; or
- makes serious unsubstantiated allegations about individuals.

Comments directed at third parties may be deemed unacceptable due to their potential impact on colleagues. Examples of such comments include rudeness, offensive statements,

derogatory remarks, inflammatory statements, or unsubstantiated allegations against these third parties.

### 3.2 Unreasonable or excessive demands

Demands that affect Home Group's ability to provide a service to all customers will be viewed as unreasonable. Examples are;

- repeatedly demanding response within an unreasonable timescale,
- insisting on speaking to, or refusing to speak to, a particular member of staff, when that is not possible,
- repeatedly changing the substance of a complaint or raising unrelated concerns.
- repeatedly raising the same complaint when a full response and explanation has been given.

### 3.3 Unreasonably persistent levels of contact

This may occur over a short period of time or over the lifetime of a complaint. Examples include;

- Continuous contact while we are in the process of considering a matter,
- Repeated telephone calls over a short period, for example, a high number of calls in one day or week,
- Lengthy telephone calls repeating the same points of discussion,
- High volumes of information provided by email or post referencing the same issues,
- Unnecessarily or excessively copying us into emails to other parties.
- High volumes of complaints that cause confusion

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## 4. Managing unacceptable behaviour

### 4.1 Immediate action

Colleague safety is of paramount importance and Home Group supports colleagues who need to take immediate actions to preserve their own safety at work. Immediate actions might include

- Terminating a phonecall if the caller is being verbally abusive
- Deploying de-escalation techniques and / or withdrawing to a safe space if confronted by threatening or aggressive behaviour in an office, customer's home, community or other setting
- Activating your lone working device / app to alert others and seek emergency response
- Calling the police in an emergency situation where you or someone else is at immediate risk of harm



Click [here](#) for Lone Working and Personal Safety policy compliance notes and procedures

Make sure you tell your manager straight away about any concerns you have about your safety at work and record any actions you take in our customer contact management systems e.g. Salesforce. Colleagues working outside of usual office hours should contact the on call manager to discuss any concerns they have for their safety and record in AIMS.

Contractors and others delivering services on behalf of Home Group should follow internal safety procedures as well as contractual information sharing arrangements to ensure that Home Group is alerted to any safety concerns.

All colleague / contractor safety incidents should be recorded in our AIMS incident management system.



Click [here](#) for incident management policy and procedures for recording incidents in AIMS

Managers should work with colleagues to assess the immediate risks of the situation and take action to reduce risks, prioritising colleague safety. Depending on the situation, appropriate actions could include

- Assigning another colleague to interact with the customer if it is believed that the unacceptable behaviour is targeted towards a particular colleague, or having a serious impact on them
- Increasing staff cover in a service and / or temporarily avoiding lone working
- Signpost the affected colleague to colleague wellbeing resources
- Seek additional advice from the Human Resources team or Legal Services.
- Placing a warning marker on the customer account to indicate potential risk to colleague safety and actions that should be taken to reduce risks e.g. do not visit alone, visit only in pairs etc



Click [here](#) for further guidance on personal safety and lone working procedures under our Health and Safety policy  
Click [here](#) for further guidance on Warning Markers and the Potentially Violent process

There is further guidance on colleague safety and wellbeing below.

## 4.2 Making reasonable adjustments

We understand that some customers may have difficulties expressing themselves or communicating clearly, especially when they are anxious or upset. Its essential that we make reasonable adjustments to support effective communication where needed. In order to do this, we will ask customers to tell us about the adjustments they need and how this will ensure they can access our services..

Examples of adjustments we can consider are:

- using different methods of communication e.g. emails instead of phone
- provide written communication in large print, coloured text, or translated into another language;
- give clear warnings if conversations become unproductive and allow customers to opportunity to modify their behaviour before ending a call.

- with the consent of the customer or other legal authority, communicating with the customer through a third party, such as an advocate or support worker.

Any restrictions imposed on a customer's contact because of unacceptable behaviour should recognise and be appropriate to their individual circumstances.

#### 4.3 Reminding and signposting to the complaints policy and procedures

If the customer is expressing dissatisfaction about the standard of Home Group service, actions or lack of action by Home Group colleagues or others acting on our behalf, this should be considered a complaint. You should remind the customer about the Complaints, Compliments and Comments Policy and how they can follow the relevant complaints handling procedure..

If the complainant continues to express dissatisfaction after exhausting the complaints handling process, they should then be reminded of the right to take their complaint to the Ombudsman or other relevant external body. They can also seek independent legal advice if they believe they can get a remedy through the courts.



Click [here](#) for Home Group Complaints, Compliments and Comments policy and procedures

#### 4.4 Safeguarding

It's important to consider whether the customer's behaviour is an indication of an underlying vulnerability that might place the customer (or members of their household) at risk of abuse or neglect. In some cases additional action might be needed to support and safeguard the customer or other members of their household.

If you are concerned about a customer's wellbeing or safety, you must follow our Safeguarding policy and procedures.



Click [here](#) for Home Group Safeguarding policy and procedures

#### 4.5 Unacceptable behaviour in supported services

Violence, threats of violence, verbal abuse and other behaviours are no more acceptable just because they occur in a supported housing services or are exhibited by a customer receiving care or support services from Home Group. In most cases, unacceptable behaviour in supported services should be managed through support planning and risk management processes. Ultimately this could result in tenancy enforcement action, or even termination of the support service to the customer if the customers' support needs are too high and / or risks cannot be safely managed.



Click [here](#) for Home Group Support Practice policy and supporting resources

In circumstances where a customer is behaving unacceptably towards Home Group colleagues out with the scope of the supported service they receive, formal action might need to be taken and the process described in section 4.6. should be followed.

Examples of behaviour that might require formal action in addition to a review of the customer's support and risk management plans include

- Persistent and unreasonable contact with the Customer Service Centre (CSC) which might result in restrictions placed on the customer's contact with the CSC.
- Repeated and excessive subject access requests
- Offensive or abusive communications targeted at a colleague outside of the supported service e.g. a senior manager or 'back office' colleague.
- Offensive or abusive communications through Home Group social media accounts

Even in such cases, relevant colleagues or teams should liaise with colleagues in the supported service so that appropriate considerations can be made in relation to updating the customer's support and risk management plans.

#### 4.6 Taking formal action

Wherever possible, we should try and reach a voluntary (informal) arrangement with the customer before taking formal action. This is to allow the individual time to consider and adjust their behaviour. Mediation or advocacy through third parties should also be considered to try and improve the situation.

In some cases we might need to take more formal action to prevent further instances of unacceptable behaviour and to protect colleagues.

If you think that a customer's behaviour has been unacceptable, and informal agreement is not possible or has not been effective in changing the behaviour, you should complete a Managing Unacceptable Behaviour form so we can consider whether further action needs to be taken.



Click [here](#) for the Managing Unacceptable Behaviour form.

Before you complete form you should:

- Check the definition of unacceptable behaviour above
- Consider whether it is appropriate to warn the customer about their behaviour first before taking further action
- Consider whether action should be taken under other policies, such as Support Practice policy if the customer is using a supported service, Anti-Social Behaviour if a customer has been threatening to a colleague or Health and Safety such as flagging the customer for a two person visit.
- Discuss with your line manager and your Director who will be able to provide advice

Once you have completed the form it will be considered by the Director of Scotland within seven days. The Director of Scotland is responsible for making decisions about action taken in relation to unacceptable behaviour UK-wide for Home Group. They may come back to you to clarify the details.

If the Director of Scotland agrees that the customer's behaviour has been unacceptable, they will decide what further action needs to be taken to avoid repeat incidents.

Actions might include;

- Terminating a complaint early
- Restricting all communication to writing
- Declining further communication on a specific issue
- Designating a single named colleague to handle all communications with the customer
- Dealing with a complaint in a different way to that outlined in the Complaints, Compliments and Comments Policy or complaints handling procedures
- Dedicated email inbox
- Limited frequency of response (e.g fortnightly)
- Block from social media
- Safeguarding referral

In extreme cases such as physical violence or harassment towards a colleague, actions could include involving the police, taking legal action and ending direct contact with the customer.

In most cases, customers should be informed 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.

The Scotland Business Support Team are responsible for notifying customers about contact restrictions and updating relevant records. You should send any supporting evidence of unacceptable behaviour (e.g. copies of emails) to the Scotland Business support team at the same time as you submit the form. Supporting evidence can be attached directly to the form and sending everything at the same time will help speed up the process.

#### 4.7 Tenancy enforcement action

If the customer's behaviour meets the definition of 'anti-social behaviour' as set out in our Tackling Anti-Social Behaviour policy, further action might need to be taken to enforce the terms and conditions of the customers tenancy, licence or lease agreement.

Action taken under Anti-social behaviour processes can be taken at the same time as action under the Managing Unacceptable Behaviour policy.



Click [here](#) for the Tackling Anti-social Behaviour policy and procedures

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## 5. Customer rights

We must take care to ensure that customers ongoing rights are respected and upheld, even where they are behaving in a way that is otherwise unacceptable and where we have taken action in response e.g. restricting contact with services.

### 5.1 Access to essential services

Even where restrictions are placed on a customer's contact with Home Group, they are still entitled to services unconnected to this restriction e.g. to requesting a new repair.

### 5.2 Subject access requests

Customers are entitled to request to see information that Home Group holds about them, and to view their own files. Excessive and unreasonable subject access requests may still be subject to restrictions if they meet our definition of unacceptable behaviour and where approved by the Director of Scotland.



Click [here](#) for guidance on subject access requests under our Data Protection policy.

### 5.3 Advice and advocacy

Customers have a right to seek independent advice, including legal advice, and to ask other people (such as family member, friend or support worker) to speak on their behalf. If a customer wishes to use an advocate, we will fully co-operate with the advocate and keep them informed of decisions made with regards to their client. In some cases, a multi-agency approach might be necessary when the individual is receiving support from other agencies such as social services.

### 5.4 Appeal and review

A customer can ask for restrictions on their contact with Home Group to be reconsidered in any of the following circumstances:

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

Any request for review or removal of restrictions will be dealt with under our complaints handling process. Stage one of a complaint of this nature will usually be considered by the Director of Scotland who will decide if any changes should be made. The outcome will be communicated to the customer within the timeframe set out in our complaints handling process.

Contact restrictions will also be routinely reviewed every six months by the Director of Scotland.

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## 6. Record keeping and information sharing

Colleagues must keep accurate and detailed records in our contact management system of any unacceptable behaviours and actions taken in response.

All information about a customer's behaviour and action taken in response must be shared appropriately and in accordance with the Data Protection Act, Home Group Data Protection Policy and associated resources.



Click [here](#) for our Data Protection policy and procedures

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## 7. Colleague safety and wellbeing

Home Group operates a zero tolerance policy to any form of harassment or abuse towards colleagues.

Where a colleague has suffered any form of harassment, abuse or stalking. It is the responsibility of Home Group to take steps to ensure that the colleague is appropriately supported.

On the rare occasion that a colleague suffers unwanted attention, the following steps should be taken:

1. In the first instance colleagues should report this behaviour to their immediate line manager, or another manager if they are not available. Colleagues should be encouraged to trust their instincts about their own safety. A preliminary discussion should be held between the colleague and their manager. Depending on the nature of the incident, it may be sufficient for the manager to have a discussion with the person, making it clear that the behaviour is unacceptable and the consequences of further incidents.
2. The manager should assess risks to colleagues and other people, and consider any immediate actions that need to be taken, prioritising colleague safety.
3. If the colleague is being stalked or harassed, or subject to any other criminal offence, then they should be advised of their right to contact the police to formally report the issue. Colleagues should be supported throughout
4. Managers should make the colleague aware of the support available to them and set out a clear support approach. This includes offering regular Brilliant Conversations and sharing information about the Employee Assistance Programme where counselling can be provided. In some cases it may be appropriate for the manager to make a management referral to Occupational Health to ensure that any colleague welfare issues are addressed. Colleagues should also be made aware of our No Home For Hate charter and commitment to challenging and eliminating discrimination in our neighbourhoods and services.



Click [here](#) for information about the Employee Assistance Programme

Click [here](#) for information about No Home For Hate

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## Version Control

Version Number	Effective Date	Amendment made by ( job title)	Version approved by (job title)	Description of Changes
1.0	2013			Original approved version
1.1	17.6.2016	, Policy Business Partner	Director of Customer Service	Guidance reformatted and put into new Policy in practice template. New policy standards added to reflect Complaints, Compliments and Comments Policy.
1.2	02.02.2018	Policy Business Partner		Updated for new format and removed reference to 'clients' .
1.3	1.3.2020	Policy Business Partner		Updated formatting. Updated policy references to ending tenure and support practice
2.0	14/1/22	Head of Customer Engagement	Director of Housing and Support	Aligned with Housing ombudsman guidance. Complaints involving unacceptable behaviour to be dealt with by Head of Customer Engagement instead of relevant Director. Improved language and customer focus - unacceptable behaviour, not person Linked to 'No Home for Hate' and related resources Removed colleague names in line with GDPR
2.1	11/8/23	Policy Manager	n/a	Removed 'first and final response' option in line with policy change
3.0	8/5/24	Policy Manager	Executive Director of Maintenance and Repairs	Complaints involving unacceptable behaviour to be dealt with by the relevant director (Head of customer Engagement role deleted) Added links to Housing Ombudsman and SPSO guidance Restructured paragraphs and retitled paragraph headings
4.0	20/3/25	Policy Manager	Director of Customer Experience	Widened scope to include unacceptable behaviour in relation to other interactions with customers (not just complaints handling).

				<p>Director of Scotland decision maker on whether behaviour meets definition of unacceptable behaviour and action to be taken in response</p> <p>Link to new process and digital form</p> <p>Strengthened section on Managing Unacceptable Behaviour, including guidance on immediate action, reasonable adjustments, safeguarding, MUB in supported services and tenancy enforcement.</p> <p>Added section on customers' rights including right of appeal</p> <p>Added links to related policy and procedures including Warning Markers, personal safety and incident management</p> <p>Recoded (previous code G184c)</p>
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