



Managing Unacceptable Behaviour Policy

COR-POL-29

Version 2.0

Date approved: 25th February 2026

Approved by: Customer Voice Committee

1. Policy Introduction and Aims

- 1.1 Southway Housing Trust (Southway) is committed to providing high quality services to our tenants and residents. We recognise that our customers have the right to be heard, understood and respected, and that we have a responsibility to ensure a safe working environment for our colleagues and partners.
- 1.2 We are committed to providing high-quality services to everyone. Occasionally, our staff may experience difficult situations, such as unreasonable demands or behaviour that make it hard to help effectively. We also must consider how the impact of unreasonable behaviour on our ability to do our work and provide a service to others.
- 1.3 This policy explains how we will manage situations where normal processes and service standards for customer service are no longer sustainable due to unreasonable customer demands or behaviour. This includes where unreasonable customer behaviour is directed at anyone delivering a service on behalf of Southway, including contractors, involved customers and volunteers.

2. Context and Regulatory Framework

- 2.1 Southway will adhere to all relevant laws and regulations to safeguard our tenants, residents and staff. This includes:
- 2.2 **Housing Ombudsman Service's Complaint Handling Code:** We will follow the Ombudsman's requirements, ensuring that any decision to place restrictions on contact is fully justified, proportionate, and regularly reviewed. You can expect transparency and fairness in how these decisions are made.
- 2.3 **Regulator of Social Housing's Consumer Standards:** We are committed to delivering our services in line with the Consumer Standards, which require social landlords to ensure homes are safe and well-maintained, manage tenancies fairly, support safe and well-kept neighbourhoods, and provide clear information while enabling tenants to influence services and monitoring satisfaction.
- 2.4 **Equality Act 2010:** Everyone will be treated fairly and with respect, in line with our Equalities Scheme. Where appropriate, we will make reasonable adjustments and work with your representatives and partners to ensure that your needs are considered.

- 2.5 **Health and Safety at Work Act 1974, RIDDOR Regulations and other relevant health and safety legislation:** We will take all appropriate steps to protect the physical and mental wellbeing, health and safety of our colleagues, contractors, customers, and volunteers.

3. Principles

- 3.1 Southway staff will always treat tenants and residents fairly, courteously, and respectfully. We value individual preferences and deliver services that are tailored to customers' needs. Our approach is professional, honest, and helpful, reflecting our Respect, Equity, Ambition, Compassion and Honest (REACH) values.
- 3.2 Southway is committed to maintaining a safe and healthy workplace for our employees, contractors, customers, and volunteers. We will support managers and staff to follow safe working practices and provide help to anyone who experiences unacceptable behaviour from customers.
- 3.3 Customers are expected to act in line with their tenancy agreement, which outlines their relationship with Southway. If a tenant, resident, or member of the public behaves in an unacceptable way, we will make it clear that such behaviour is not tolerated, take appropriate action, and work to prevent further incidents.

4. Definitions

- 4.1 We understand that people may act out of character in times of trouble or distress and that there may have been upsetting circumstances which contribute to a customer behaving in a particular way. We do not view behaviour as unacceptable just because someone is forceful or determined, and we also commit to supporting our customers and always acting in line with [our Safeguarding Policy](#).
- 4.2 We categorise unacceptable behaviour as follows:

Aggressive, Violent or Abusive Behaviour - This includes actual physical harm and threats, intimidation, discriminatory remarks, or language that causes colleagues to feel unsafe or harassed. This applies to face-to-face meetings, phone calls, written contact, and online/ social media.

Unreasonable Demands - Repeatedly requesting excessive or unnecessary information, demanding immediate responses, or refusing to

accept reasonable resolutions and the organisation's position once clearly stated with evidence.

Unreasonable Contact - Making persistent phone calls, sending excessive emails including outside of office hours, or refusing to engage in the complaints process constructively whilst continuing to make repeated demands.

Our customer-focused approach

- 4.3 We appreciate that our customers may sometimes act with determination and assertiveness, especially during difficult or distressing times. Our aim is to listen, respond with empathy, and provide kind and supportive service. We actively promote our complaints service to ensure that customers are aware of how to raise any concerns. All complaints will be investigated fairly and in accordance with our [Complaint Handling Policy](#).
- 4.4 We're committed to working with customers to understand individual circumstances and specific needs, and we will proactively make reasonable adjustments. This includes liaising with representatives working on customers' behalf, where we have permission to do so, and with partner agencies, such as social services, where appropriate. We will also ensure we record reasonable adjustments.
- 4.5 We'll always think about how any restrictions might affect reasonable adjustments we've made to support you. Sometimes, if someone's behaviour is unacceptable, we may need to change or remove an adjustment because it's no longer reasonable, helpful, or manageable. Wherever possible, we'll look for alternative ways for you to access our services.
- 4.6 Maintaining your privacy will always be at the heart of our approach. Southway complies with the Data Protection Act 2018 and will treat all personal data with the utmost care and in line with the legislation. How we use, store, and process your data is set out [in our Privacy Statement, which is available to view on our website](#). Paper copies can be requested from our Governance Team governance@southwayhousing.co.uk. You may also contact them if you believe there has been a breach of your rights as a Data Subject.

5. Managing unacceptable behaviour

5.1 Southway will adopt the following approach in situations where customer behaviour is identified as potentially unacceptable. This includes:

Stage 1: Reaching an Informal Agreement

5.2 Before considering any contact restrictions, we aim to resolve issues informally whenever possible. This includes seeking a voluntary agreement and exploring whether a conversation with the resident may help to de-escalate the situation, so that no further action is necessary.

5.3 Depending on the circumstances, mediation, or advocacy by a third party may be considered to help improve the situation and allow us to continue providing our service. We will also work with nominated representatives where appropriate.

5.4 We will send the customer an informal written notice outlining our concerns about the behaviour in question. This notice will include factual details such as the date, time, and a description of the incident(s). We will also explain what further steps may be taken if the behaviour reoccurs. If informal action does not stop the unreasonable behaviour, we will consider further steps.

Stage 2: Formal Restrictions

5.5 To make sure any further action is fair, decisions to apply contact restrictions will be reviewed by our Customer Contact Panel, which is made up of senior managers. This Panel will ensure:

- Reasonable adjustments are offered
- Action is proportionate
- Support is available.

5.6 If the Customer Contact Panel determines that restrictions are appropriate, we will communicate the outcome to customers in writing. This letter will:

- Provide factual details such as the date, time, and a description of the incident(s)
- Set out a clear explanation for the decision
- Detail the restrictions or changes to service delivery applied
- Confirm when this will be reviewed by the Panel, which will be within three months
- Explain how you can raise service requests and complaints while restrictions are in place.

Regular Monitoring of restrictions

- 5.7 The Customer Contact Panel will review the impact of restrictions after three months. If behaviour has improved, restrictions will be removed. If it has not improved, an explanation will be provided to the customer as to why the restriction will remain in force for a further period pending the next agreed review date.
- 5.8 To ensure this policy continues to reflect our commitment to fairness and inclusivity, we will regularly review the EDI characteristics of customers subject to any restrictions. This will ensure that the policy is being applied equitably and in accordance with our values. This will be shared on an annual basis with our Customer Voice Committee.

6. Types of restrictions

- 6.1 Restrictions will be determined on a case-by-case basis but could include:
- Providing a single point of contact.
 - Limiting contact to a single form i.e. to writing, email or telephone only.
 - Limiting contact to certain times or to a limited number of times per week or month
 - Declining to give any further consideration to an issue unless any additional evidence or information is provided
 - Only considering a certain number of issues in a specific period
- 6.2 Occasionally, we may implement restrictions, which change how customers access our complaints service. For example, we may limit the number of complaints you can raise in a specific period. This will never be a blanket restriction, and we will provide evidence and our rationale to the customer in line with this Policy. Customers will always be able to appeal the decision and contact the Housing Ombudsman Service for independent advice.
- 6.3 In rare cases, where the severity of unacceptable behaviour requires immediate action or where earlier interventions have not improved the situation, we may take legal action to reinforce the restriction, set out the consequences if breached, and encourage compliance with the relevant terms of the tenancy agreement where applicable.

7. Appeal and independent advice

- 7.1 When we write to the customer to explain that contact restrictions will be applied, we will explain how to appeal this decision. Appeals will be heard by a senior manager who was not involved in the original decision to apply restrictions. 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. This will usually take place within 20 working days of receiving an appeal.
- 7.2 Customers can also seek independent advice from the Housing Ombudsman Service. Housing Ombudsman Service PO Box 1484 Unit D Preston PR2 0ET Telephone: 0300 111 3000 (lines are open 9am - 5pm Monday - Friday except Thursdays 3.30pm - 5pm due to training).

8. Equality Diversity and Inclusion (EDI)

- 8.1 EDI is central to how we work, how we treat each other, and how we serve our communities. We believe everyone deserves to feel respected, valued and included. We ensure that these principles are applied fairly and consistently as outlined in our Equalities Scheme.
- 8.2 To make sure our policy is fair to everyone, we've carried out an Equality Impact Assessment and consulted customers. We're committed to supporting all residents throughout the process and will proactively work to understand personal circumstances and put reasonable adjustments in place. This can include working with nominated representatives or changing the way we do things, where possible, to suit your personal circumstances.

9. Customer voice and influence

- 9.1 We sought the views of tenants to create this policy. We regularly seek customer feedback on our approach to delivering our services, including how we manage unacceptable behaviour. You can get involved by joining our Customer Access Service Improvement Group.

10. Accountability

- 10.1 The Assistant Director - Customers and Communities is responsible for making sure this policy is implemented effectively.

10.2 All staff involved in delivering customer-facing services are trained in the relevant procedures to ensure consistency and quality.

11. Policy Review

11.1 This policy will be reviewed annually as part of our compliance with the Housing Ombudsman Service’s Complaint Handling Code.

12. Links to Other Policies and Strategies

12.1 [This policy works alongside all of Southway’s customer facing policies and our Equalities Scheme, Corporate Plan and Customer Voice Strategy.](#)

POLICY REVIEW HISTORY	
<i>To be completed during each review</i>	
Previous versions	
V1 – September 2024 – Executive Team	
Date of last EIA:	30 th January 2026
Review lead by:	Assistant Director-Customers and Communities
Main points or amendments made and reasons	
<p>Updated policy to align with Housing Ombudsman Service’s Complaint Handling Code requirements. Significant changes include:</p> <ul style="list-style-type: none"> • Adopting a more customer-friendly style, reflecting our tone of voice (throughout). • Adding new sections to the Policy in line with our Policy Template to clarify Accountability, EDI Approach, Links to Other Policies and Policy Review schedule. • 1.2 and throughout -The Policy now covers unacceptable behaviour towards contractors, customers, volunteers, and colleagues • 2.1 - Updated the Political and Regulatory Context section to reference the Complaint Handling Code, Consumer Standards, and key safety legislation. • 2.4 and throughout - Added Equality Act 2010 reference, demonstrating how the Policy addresses related legal obligations. This supports compliance with 3.1 of the Complaint Handling Code, which requires landlords to ‘consider [their] duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.’ • 3.3- Highlighted our expectation that customers act in line with their Tenancy Agreement. 	

- 4.2 and 4.3- Updated to provide specific and practical definitions of unacceptable behaviour and to refer to the Complaints Handling Policy, in line with tenant feedback.
- 4.4, 4.5, 5.5, 5.8, 8 and throughout- Clarified that Southway will address personal circumstances and individual needs in cases of unreasonable behaviour, explicitly committing to reasonable adjustments, mediation, and liaising with nominated representatives & multi-agency partners. This approach is consistent with Ombudsman best practice and ensures compliance with the Complaint Handling Code’s requirement (5.10) that we ‘must make reasonable adjustments for residents where appropriate under the Equality Act 2010 and keep records of these.’
- 4.6, Introduced commitments around privacy and confidentiality, which is required by the Ombudsman.
- 5.5-Introduced a Customer Contact Panel to consider and implement restrictions as needed. This is to ensure proportionate approach, informed by evidence and to evidence objective decision-making. The Panel’s role will support compliance with 5.15 of the Complaint Handling Code, which requires landlords to ensure that ‘any restrictions placed on resident contact due to unacceptable behaviour must be proportionate.’
- 6.1 , Adopted the Ombudsman’s accepted list of contact restrictions.
- 6.2 , Introduced specific reference to how we will manage complaints associated with unacceptable behaviour, as required by the Ombudsman as part of their review of our Complaints Handling Policy.
- 7-Provided detailed information about the appeal process and provided contact details for the Housing Ombudsman Service. This was a requirement outlined by the Housing Ombudsman Service in their review of our self-assessment with the Complaint Handling Code.
- 5.8 - Introduced new monitoring and reporting on the use of formal restrictions by customers’ protected characteristics to ensure our approach is non-discriminatory.

As a result of our EIA, we have

- Introduced a Customer Contact Panel to consider and implement restrictions as needed. This is to ensure any action taken is determined by colleagues unconnected with the original issue. We will also require significant threshold of evidence to implement any restrictions. This ensures senior oversight of any decisions.
- Introduced new monitoring and reporting on the use of formal restrictions by customers’ protected characteristics to ensure our approach is non-discriminatory.

Next review due:	Q4 2026/27
Approval level:	Executive