1.0 Introduction

1.1 This policy explains what we mean by unacceptable behaviour. It also explains how we will respond when this happens. We want to give a fair, respectful and helpful service to everyone. We will listen, treat people fairly and try to put things right when they go wrong. We also need to keep colleagues, contractors and third-party workers safe.

1.2 We know people may contact us when they are upset, worried or frustrated. Being firm, unhappy or persistent does not always mean someone's behaviour is unacceptable.

1.3 But some behaviour can be harmful. It can make our colleagues feel unsafe. It can also make it harder for us to help other people.

1.4 This policy helps us deal with these situations in a fair and consistent way.

2.0 Purpose

2.1 The purpose of this policy is to set clear expectations about behaviour when people contact or interact with Saffron. We believe tenants and customers have the right to be heard, understood and treated with respect. We will not treat behaviour as unacceptable just because someone is assertive, determined, upset or unhappy. However, we also have a duty to protect the health, safety and wellbeing of colleagues, contractors and third-party workers.

2.2 This policy helps us:

- Protect colleagues, contractors and third-party workers from abuse, threats, threats of violence, harassment, discrimination and unsafe behaviour
- Support colleague wellbeing
- Keep services running effectively for everyone
- Respond in a clear and consistent way
- Make fair decisions based on facts
- Consider people's needs before taking formal action.

2.3 The policy supports our legal duties. This includes health and safety, equality, data protection and complaint handling.

2.4 We are committed to taking reasonable steps to prevent and address harassment, discrimination, abuse and violence by tenants, customers, visitors or other third parties, in line with our responsibilities as a landlord and employer.

2.5 It also supports our aim to provide safe, respectful and accessible services.

3.0 Scope

3.1 This policy applies to anyone who contacts or interacts with Saffron, including:

- Tenants
- Customers
- Applicants
- Residents
- Advocates
- Representatives
- Family members
- Visitors
- Members of the public.
- Other third parties who may contact or interact with us.

3.2 It applies in all places where Saffron services are provided. This includes our offices, homes, communal areas, public places, events, and online or remote services.

3.3 This policy does not stop anyone making a complaint, asking a question or challenging a decision. We will deal with complaints under our Complaints & Resolution Policy.

3.4 Unacceptable behaviour is about how someone behaves when they contact us. If behaviour is unacceptable, we may limit how someone contacts us. But we will still accept and respond to their complaint, unless there is a valid reason not to.

4.0 What counts as unacceptable behaviour

4.1 **Aggressive, abusive or violent behaviour** is not acceptable. This includes actions, words or messages that make colleagues feel unsafe, threatened, afraid, offended or abused. Examples include:

- Repeatedly making serious allegations after they have been investigated and found to be unsubstantiated
- Threatening, insulting or abusive language
- Discriminatory comments. This includes racist, sexist, homophobic, biphobic, transphobic, religious, ableist or sexual comments
- Threats to harm someone or damage property

4.2 **Harassment** is not acceptable. This includes:

- Recording phone calls and posting them online
- Sharing personal or private information about colleagues
- Contacting colleagues through their personal social media accounts
- Repeatedly contacting us after being asked to stop

4.3 **Online harassment and social media abuse** is not acceptable. It may include:

- Abusive posts or direct messages

- Repeated tagging
- Threats
- Discriminatory comments
- Sexual harassment
- Encouraging others to target colleagues or contractors

4.4 We will collect evidence safely and fairly. We will only collect what we need. Evidence may include screenshots, dates, times, usernames, profile names, links, messages, witness details and a short note about the impact. We will store evidence securely.

4.5 We may ask a social media platform to remove content. We may do this if the content breaks platform rules, shares personal information, targets colleagues, or creates a safety or safeguarding risk. We may contact the police if there are threats, stalking, harassment, hate crime, malicious messages, sexual harassment, doxxing or another possible crime.

4.6 **Contact can also become unacceptable if it is too much or unreasonable**. This may mean many calls in a short time. It may also mean repeated calls over several days or weeks. Examples include:

- More than 5 contacts in 2 working days about the same issue after we have explained the next step or response time
- Repeatedly contacting different teams or colleagues about the same issue after being given a named contact or clear route for updates
- Repeatedly asking for a response outside our published or agreed timescales without an urgent reason
- Continuing to repeat the same points after we have given a clear response

These are indicators only. They do not automatically mean contact is unacceptable. We will consider the person's circumstances, the urgency of the issue, any reasonable adjustments needed, and whether our own actions have contributed before deciding what to do.

5.0 How we try to prevent unacceptable behaviour

5.1 We want to prevent problems where we can. We do this by giving clear information, keeping people updated and helping colleagues respond early.

5.2 We will take reasonable steps to prevent harassment, discrimination, abuse and violence, including sexual harassment. This applies to colleagues, contractors, agency workers, volunteers and other third-party workers. It also includes behaviour by people who use our services. We expect the same standards of behaviour towards contractors, agency workers, volunteers and third-party workers as we do towards colleagues. We will do this by:

- Making it clear what behaviour is acceptable when people contact Saffron

- Using plain English and avoiding jargon
- Explaining decisions, timescales and next steps clearly
- Keeping people updated if there are delays
- Making reasonable adjustments where needed. This means changing the way we work so people can use our services fairly
- Offering translation or interpretation where this would help
- Offering safe and flexible ways to contact us
- Checking higher-risk activities and putting safety steps in place
- Training colleagues to set boundaries and speak up early when behaviour becomes difficult

5.3 We have a legal duty to take reasonable steps to prevent sexual harassment of workers. This includes harassment by tenants, customers, contractors, visitors and members of the public. We will also take reasonable steps to prevent and respond to wider harassment, discrimination, abuse and violence wherever this creates a risk to colleague safety or wellbeing. We will assess higher risk situations, put safety steps in place, train colleagues and managers, record incidents, support affected colleagues, and review what happened so we can reduce the risk of it happening again.

6.0 What we do when behaviour becomes unacceptable

6.1 Our response will depend on what happened and how serious it was. In most cases, we will explain why the behaviour is not acceptable. We will try to agree a way forward and give the person a chance to change their behaviour.

6.2 For example, if someone is abusive or threatening on the phone, we will warn them that the call will end. If the behaviour continues, we will end the call.

6.3 Before formal restrictions are considered, we may decide not to consider an issue further unless new evidence or information is provided. We may do this where we have already given a clear response, the issue has been looked at properly, and repeated contact is preventing a fair service for others.

6.4 Before we take formal action, we will think about the person's needs and circumstances. This may include disability, mental health, trauma, neurodiversity, learning disability, dementia, cognitive impairment, communication needs, language needs, digital access, protected characteristics or other vulnerabilities. We will consider whether behaviour that appears challenging, repetitive or unreasonable could be linked to a known or emerging health condition, distress, confusion, unmet support needs or safeguarding concerns. We will base our decision on behaviour and evidence. We will not make assumptions about someone's circumstances.

6.5 We may look at support options before taking further action. This could include using a representative, involving an advocate, suggesting mediation, making or reviewing reasonable adjustments, or working with other agencies.

6.6 If behaviour may be linked to safeguarding, we will follow our Safeguarding Policy. We will do this before deciding if a contact restriction is right. This may include mental health crisis, dementia, cognitive decline, confusion, self-neglect, exploitation, abuse, threats of harm, unmet support needs, or where someone may not be able to keep themselves or others safe. Colleagues should ask a manager for advice. They should make a safeguarding referral where needed.

6.7 If things do not improve, we may limit how someone contacts us. We may also do this if there is an immediate safety risk. A Head of Service, or a senior manager at the same level, must approve any formal contact restriction. We will record the decision, the evidence, the approval and what we considered first. This includes reasonable adjustments, support options, safeguarding concerns and other contact methods. Restrictions may include:

- Having a single point of contact
- Limiting how or when contact is made
- Limiting call length
- Setting limits on the number of issues we can deal with at one time
- Restricting home visits or carrying out visits in pairs.
- Not using digital-only restrictions if this would unfairly affect someone because of age, disability, access needs, language needs or digital exclusion

6.8 In serious cases, we may consider legal action. This could include contacting the police or applying for an injunction. Some behaviour may be a crime. This includes physical assault, harassment or hate crime. We will support colleagues who choose to make a police report. Following incidents involving threats, harassment, abuse or violence, colleagues will be offered appropriate support. This may include manager support, wellbeing support, the Employee Assistance Programme, debriefing, temporary adjustments to duties, or referral to Occupational Health where appropriate.

6.9 If we put a contact restriction in place, we will write to the tenant or customer within **5 working days**. We will explain the restriction, why we made the decision, what evidence we looked at, what reasonable adjustments we considered, how long the restriction will last and how they can appeal.

6.10 If we apply contact restrictions, we will still deal with any outstanding complaint, service request or issue. Restrictions may change how someone contacts us. They will not stop us considering and responding to the issue they raised.

6.11 When a contact restriction is agreed, the manager will tell the teams who need to know. They will explain what the restriction is, why it is needed, how long it will last

and what contact routes must stay open. This may include customer services, repairs, housing, complaints, safeguarding, legal, contractors and other teams who may have contact with the person. We will only share information that is needed and fair.

7.0 Appealing the decision

7.1 If we restrict how someone can contact us, they can appeal by speaking to us or writing to us. A senior manager will review the appeal. This must be someone who was not involved in the first decision. The review will be completed and a response sent within 10 working days.

7.2 If someone thinks we have treated them unfairly, they can make a complaint. We will deal with this under our Complaints & Resolution Policy.

7.3 A contact restriction does not affect a tenant's right to refer a complaint to the Housing Ombudsman Service at any time.

7.4 We will review all contact restrictions every 3 months. We may remove the restriction if there have been no further incidents. We will confirm the outcome in writing.

8.0 Monitoring and Compliance

8.1 Colleagues must report incidents of unacceptable behaviour as soon as reasonably possible and record them in line with organisational procedures. Managers are responsible for making sure incidents are reviewed, support is considered, and any further action is agreed and recorded.

8.2 We will record all incidents of unacceptable behaviour. We will use our internal reporting systems. We will record what happened, what evidence we looked at, what action we took, what support or adjustments we considered, and the outcome.

8.3 We will check if incidents involve people with protected characteristics or vulnerabilities. This includes checking whether behaviour may be linked to disability, mental health, dementia, cognitive impairment, neurodiversity, learning disability, distress, communication needs or safeguarding concerns. We will also check if reasonable adjustments were needed and used.

8.4 We will review patterns and trends. This will help us spot risks to colleague health and safety, identify where further support or reasonable adjustments may be needed, and check whether our harassment prevention activity is working. We will raise concerns through Saffron’s health and safety processes.

8.5 We will report patterns, themes and learning to senior managers. Where needed, we will also report them to the Board or the right committee. This will help us improve services, improve communication, support colleagues and tenants, and reduce avoidable problems.

8.6 We will consider the Public Sector Equality Duty when we monitor this policy. This means we will think about how the policy helps us stop discrimination, support equality and build good relationships.

9.0 Data protection

9.1 We will follow the Data Protection Act 2018 and UK GDPR when we use personal information under this policy.

9.2 We will only collect and use information that is needed, fair and relevant. This may include information about incidents, restrictions, appeals and reviews.

9.3 We may use sensitive information, such as health, mental health, disability, safeguarding or support needs. We will only use this when we have a lawful reason and it is needed to make a fair and safe decision.

9.4 We will keep records only for as long as needed. This includes incident records, contact restriction decisions, review notes and appeal outcomes. We will follow Saffron's retention rules.

9.5 We will only share information with other organisations when there is a clear and lawful reason. This may include the police, safeguarding teams, health or social care services, legal advisers, contractors or the Housing Ombudsman Service. We will only share the minimum information needed.

9.6 We will consider a Data Protection Impact Assessment before making any major change to how we collect, use, share or monitor information under this policy. This is especially important if sensitive information, new systems, new monitoring tools or new data sharing are involved.

9.7 If colleagues are unsure what information they can use, keep or share, they must ask a manager or the Data Protection Officer before taking action.

10.0 Training and Awareness

10.1 To make sure colleagues are aware of this policy, we provide clear and practical training.

10.2 All colleagues will be made aware of this policy when they start at Saffron and through appropriate refresher briefings, training or guidance. We will keep records of training or briefing activity where this is required.

10.3 This training helps colleagues stay safe, provide a good service, and handle challenging situations confidently.

10.4 Contractors and third-party workers will receive information, briefing or training on this policy where this is relevant to their role and contact with tenants, customers or members of the public.

11.0 Our legal responsibilities

11.1 This policy is published on our website and available in accessible formats on request. This may include large print, easy read, translated versions or another format that helps someone understand and use the policy.

11.2 We must follow several laws and rules when we manage unacceptable behaviour. These help us protect colleagues, support tenants fairly, and make safe and consistent decisions. These include:

- **Housing Ombudsman's Complaint Handling Code**, which requires us to have a policy explaining how we will manage unacceptable behaviour
- **Housing Ombudsman guidance**, which sets out what good practice looks like. This policy follows that guidance
- **Data Protection Act 2018 and UK GDPR Regulations**, which tell us how to safely collect, store and use personal information, including sensitive or medical details
- **Social Housing (Regulation) Act 2023**, which gave the Housing Ombudsman's Complaint Handling Code statutory force from April 2024 and requires registered providers to comply with the Code
- **Human Rights Act 1998**, which means we must consider whether contact restrictions could affect a person's right to respect for private and family life under Article 8. Any restriction must be lawful, necessary and proportionate.
- **Equality Act 2010**, which means we must consider disabilities, mental health, medical needs, dementia, cognitive impairment and other protected characteristics, and make reasonable adjustments where needed
- **Equality Act 2010 section 149 Public Sector Equality Duty**, which means we must consider equality impacts when applying, monitoring and reviewing this policy
- **Regulator of Social Housing Consumer Standards 2024**, including the Transparency, Influence and Accountability Standard, which requires us to treat tenants fairly, provide clear and accessible information, support complaints, and help tenants hold us to account
- **Regulator of Social Housing Neighbourhood and Community Standard 2024**, which requires that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes
- **Worker Protection (Amendment of Equality Act 2010) Act 2023**, which requires us to take reasonable steps to prevent sexual harassment of workers, including by people who use our services. Our reasonable steps include clear standards of behaviour, colleague and manager training, risk assessments for higher-risk activities, safe reporting routes, manager support after incidents, recording and monitoring incidents, and taking action where behaviour is sexually harassing or creates an unsafe working environment

- **Protection from Harassment Act 1997**, which applies where unacceptable behaviour becomes persistent harassment of colleagues
- **Health and Safety at Work (etc.) Act 1974**, which requires us to protect colleagues from violence, harassment, and unsafe working conditions.

12.0 Related Policies and Documents

- Complaints & Resolution Policy
- Reasonable Adjustments Policy
- Equality, Diversity & Inclusion Policy
- Wellbeing & Safety Alert Policy
- Safeguarding Policy
- Lone Worker Management Policy
- Whistleblowing Policy
- Dignity at Work Policy
- Anti-Social Behaviour and Hate Crime Policy

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