



Unreasonable Behaviour Policy

Approved by: CHS Board

Approval date: June 2026

Next review date: June 2028

Applies to: Coop Homes South (landlord and managing agent services)

1. Introduction

- 1.1 The majority of residents and individuals representing client organisations are respectful and it is only a minority that behave in a way that could be considered unreasonable. Behaviour becomes unreasonable when it involves the abuse of our colleagues, a disregard for our procedures and when it takes up a disproportionate amount of our time, preventing us from dealing with the issue in question and providing a service to others. This policy sets out what we consider is unreasonable behaviour, aims to protect our employees and maintain effective communication while ensuring all residents retain the right to raise concerns and have them investigated fairly, in line with the Housing Ombudsman's Complaints Handling Code, and all individuals representing client organisations retain the right to raise concerns and have them fairly investigated under our business-to-business complaints policy
- 1.3 This policy has links to some of our other documents, and we've thought about these when developing the policy.
- 1.3 This policy should be read in conjunction with the landlord's:
 - a) Complaints Policy (landlord)
 - b) Complaints Policy (Managing Agent)
 - c) Complaints Policy (Business to Business)
 - d) Antisocial Behaviour Policy

1.4 This policy also outlines the support available to employees who experience unreasonable behaviour in the course of their work.

2. Scope

2.1 This policy applies to Coop Homes South (CHS).

2.2 This policy applies to any communication received by Coop Homes (its employees, representatives and contractors) from residents of CHS (where CHS is the landlord), residents of properties that CHS manages for others (where CHS is the managing agent) Management Committees members, employees and other individuals representing client organisations (where CHS is the managing agent), , and any other individual or group affected by the services that we provide.

2.3 This policy aims to ensure that we:

- are clear about behaviour that we consider to be unreasonable
- take appropriate and proportionate steps to manage such behaviour
- apply restrictions fairly and consistently
- respect our customers' right to be heard, regardless of any restrictions.

3. Examples of Unreasonable Behaviour

3.1 Although not an exhaustive list, we have split what we consider to be unreasonable behaviour into the following broad categories:

Aggressive or abusive behaviour

3.2 This includes physical aggression as well as language that is:

- intended to insult, degrade or intimidate
- intended to bully, victimise or harass
- threatening or verbally abusive
- making serious unfounded allegations
- motivated by prejudice on the basis of ethnicity, religion, sexual orientation, or similar grounds.

Unreasonable demands

3.3 This includes:

- repeatedly demanding a response within an unreasonable timescale
- insisting on dealing with a particular colleague or refusing to deal with another
- repeatedly changing the substance of a complaint or raising unrelated concerns

- repeatedly referencing and re-raising old complaints that have already been considered
- requesting large volumes of information without a good reason.

Unreasonable levels of contact

3.4 This includes:

- a) A volume of letters or emails that is disproportionate to the issue being raised, including repeated correspondence that does not introduce new information or continues after a response has been provided.
- b) A pattern of telephone contact that is unreasonably frequent or prolonged, including repeated calls within short timeframes or calls that continue beyond what is reasonably required to address the matter.
- c) Providing unnecessary levels of information.
- d) Repeatedly raising the same complaint or issue through different channels when we have made clear our response. The customer will have the right to pursue a complaint through our complaints process.
- e) Unreasonable persistence and refusing to accept a decision.

Refusal to co-operate

3.5 Examples include where a customer refuses to:

- provide further details, information or evidence
- summarise or clarify the concerns they have raised within set timeframes
- provide access to allow inspections or work to be completed that will resolve a complaint or service request.

Social media

3.6 We may also consider it unreasonable if a customer abuses social media in any way stated above and also if they:

- contact employees using their personal details or personal social media accounts
- publish personal, sensitive, or private information about employees online.

4. Our Response

4.1 In making a fair judgement we will consider:

- a. that customers are entitled to raise legitimate queries or concerns about any aspect of our service.
- b) whether the behaviour is reasonable in proportion to any loss or wrongdoing

experienced.

- c) the circumstances of the customer, i.e., any known health issues or language difficulties making it difficult for them to request a service.
- d) that customers can act out of character due to upsetting circumstances prior to them contacting us.

- 4.2 We recognise that someone who is upset, angry or emotional is not (necessarily) behaving unreasonably. We will also remember that customers exhibiting unreasonable behaviour may be raising a valid point.
- 4.3 In deciding the appropriate course of action to take, we will try to remain impartial and objective to ensure that the fair decision is reached. We understand that it is always useful to get a second opinion, particularly from someone who has had no direct involvement in the case.
- 4.4 We will always be mindful of context, and any restrictions that we decide to put in place must be appropriate for that person, recognising our responsibilities under the Equality Act 2010. For example, we would not restrict a customer's contact to writing if we are aware they have a disability which prevents them from communicating in this manner.

5. Confidentiality and Data Protection

- 5.1 We are committed to protecting the privacy and confidentiality of all individuals in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 5.2 When managing incidents of unreasonable behaviour, we will ensure that any personal data collected, stored, accessed, or disclosed is handled lawfully, fairly, and transparently. This includes:
- a) **Collection:** Only information that is relevant and necessary for managing the behaviour or related complaint will be collected.
 - b) **Storage:** Personal data will be securely stored in accordance with the organisation's data protection and information security policies.
 - c) **Access:** Access to personal information will be limited to authorised personnel who require it for legitimate purposes.
 - d) **Provision and Disclosure:** Personal information will not be shared or disclosed to third parties unless there is a lawful basis for doing so, such as compliance with a legal obligation, safeguarding concerns, or with the individual's explicit consent.
 - e) **Retention:** Personal data will be retained only for as long as necessary to fulfil the purpose for which it was collected, after which it will be securely deleted or anonymised.
- 5.3 We will ensure that all handling of personal data within the scope of this policy complies fully with the principles and obligations set out in the Data Protection Act 2018.

6. Action – unreasonable behaviour by a resident

Informal Actions

- 6.1 Where appropriate, we will first seek to agree informal communication arrangements with a customer, as this may be less resource-intensive than applying formal restrictions. This may include agreeing specific call times, setting limits on call length, agreeing a set frequency for correspondence (for example, weekly or fortnightly), and limiting the number of issues raised. We may also consider mediation, involving an advocate or representative, or engaging members of a resident group.
- 6.2 It will not always be possible to reach an informal agreement, or we may not consider it appropriate to attempt this in some circumstances. If no informal agreement can be reached, we will warn the customer before putting any formal restrictions in place. The warning (which could be in writing, in person or by phone) will include clear examples of where we consider the customer's behaviour to be unreasonable. We will ask them to modify their behaviour and explain that we will consider taking formal action under this policy if they do not. We may also provide a copy of (or link to) this policy for their reference.

Formal Restrictions

- 6.3 If the behaviour persists, we will consider putting formal restrictions in place which can include:
- a) appointing a single point of contact (this could be a person or an email address or webform)
 - b) limiting contact to a specific form, such as email, web contact form, telephone, or letter
 - c) communicating only via an advocate or representative
 - d) restricting access and responses to certain times
 - e) restricting access to our offices
 - f) limiting the number of issues that can be raised and responded to
 - g) drawing a line under closed complaints that we have already considered
 - h) only responding on the provision of new information or evidence
 - i) only responding on receipt of any clarification or summary requested.

- 6.4 Any decision to apply formal restrictions will be made by a Head of Service
- 6.5 In exceptional circumstances, we may consider stopping all direct contact with a customer, taking legal action or notifying the Police.
- 6.6 A customer will be informed of any formal restrictions in writing, including the length of time they are to be in place, the reasons for the decision and the right of appeal. A note will also be placed on the customer's records to reflect this.
- 6.7 Unreasonable communication can also fall under our Tenancy Management Policy if considered to be a breach of a customer's tenancy. In such cases, action may be taken simultaneously under both policies.

Appeal and Review

- 6.8 Customers will have the opportunity to appeal any decision to restrict their contact to the Managing Director within ten working days. They will be informed of how to appeal in writing and will be notified of any appeal outcomes in writing.
- 6.9 No restrictions should be in place indefinitely and will be for a set period (e.g., two, four or six months – depending on the severity of the behaviour). The situation will be reviewed after the set period. If the behaviour has improved, consideration will be given to removing any restrictions. If the behaviour continues, the restrictions will remain in place for another set period pending further review.
- 6.10 We will keep robust records to demonstrate the behaviours being experienced and the steps taken to try and address them before any formal action was taken.
- 6.11 Customers can contact the Housing Ombudsman Service at any time for advice regarding the application of this policy.

7. Action – unreasonable behaviour by individuals who are representing client organisations

- 7.1 Where it is a business-to-business relationship, we will not tolerate abusive or threatening behaviour towards an individual or group of individuals in the same way that we would not accept this from a resident.
- 7.2 Our duty is to protect our staff, and a panel will be convened (made up of two managers) and they will review any evidence from staff who have contact with the organisation with a view to implementing the following escalation process by starting at the appropriate level:
- 7.3 **Level one:** We will write or speak to the client to point out to them that their behaviour is unacceptable and provide examples of things they have done which we will not tolerate. They will be given an opportunity to amend their behaviour. The communication should be aimed at re-building the relationship and acknowledge any legitimate cause of frustration and the fact that this can spill over. Any new arrangements will be confirmed in writing.

- 7.4 **Level two:** Where level one has failed or where an incident is serious enough to warrant a stronger response, we will look to restrict their communication. We may wish to meet them to discuss their behaviour ahead of agreeing steps we will put in place. We will consider, but not be limited to the following options:
- Limit the client to written only communication e.g. via email
 - Where the contact is vexatious, changing the service levels that apply e.g. not replying to each email within a set timescale and grouping together emails and providing a consolidated response on an agreed regular basis e.g. weekly or monthly
 - Reserving the right not to reply to abusive or threatening emails by giving specific examples of previous behaviour which is not acceptable
 - A change in points of contact on either side effectively setting out who is allowed to communicate with who
 - Withdrawing the attendance at meetings either in person or online
 - Requiring that they take action against their staff to adhere to their own policies e.g. code of conduct
- 7.5 Following the meeting, the client will be written to outlining the restrictions that have been agreed and setting out the timescale during which they will apply. A maximum period of six months will be used but this can be extended following a further review.
- 7.6 **Level three:** this would generally only be used where level two has failed, or the situation is so serious that it warrants legal action. In this situation, the panel would look at the following options:
- Making a permanent change in the way the contract is managed from our side e.g. new points of contact and different working arrangements
 - Taking legal action to limit their behaviour
 - Informing the Police
 - Instigating the alternative dispute resolution process in the Contract
 - Re-negotiating the services we will provide
 - Serving notice on the client to end the contractual relationship and withdraw our services

8. Equality, Diversity and Inclusion

- 8.1 We are committed to making our services and processes accessible and easy to use for all our customers in line with our statutory duties. If a customer needs support in putting their complaint in writing, they can tell us. All requests from customers to accommodate their needs will be considered and acted on where possible in accordance with our Reasonable Adjustments policy and the Equality Act 2010.
- 8.2 Customers can request a reasonable adjustment from us through the officer they are engaging with, or by contacting customerservices@coophomes.coop. Examples of the support we can provide include supplying information in alternative formats, adapting our communication method, and allowing more time for a communication to be brought to our attention.

9. Responsibilities

- 9.1 The Heads of Service have authority to apply formal restrictions based on a customer's behaviour.
- 9.2 The Head of Governance has responsibility for ensuring this policy is up to date, relevant and being delivered.
- 9.3 The Managing Director has overall responsibility for the policy.

10. Supporting our employees

- 10.1 We are committed to providing a safe, respectful, and supportive working environment for all our employees. While we understand that some customer contact may be challenging due to difficult circumstances, we will not tolerate behaviour that is abusive, threatening, or otherwise unreasonable towards our employees.
- 10.2 All employees who are subject to unreasonable behaviour will be supported by their manager. Heads of Service, supported if necessary by the RHP People Team, are also available to provide appropriate support. This may include, but is not limited to:
- a) Supportive conversations following an incident
 - b) Breaks if needed after a difficult interaction
 - c) Access to Simply Health for confidential counselling or wellbeing support
 - d) Risk assessments and adjustments where repeated or escalated behaviour is involved
 - e) Flagging and warnings in customer services systems to alert other colleagues of risks.
- 10.3 Managers have a responsibility to:
- a) Regularly check in with their teams where unreasonable behaviour is being experienced
 - b) Ensure appropriate reporting is completed
 - c) Liaise with senior managers, supported by the RHP People Team if necessary, where behaviour is escalating or causing ongoing difficulties.
- 10.4 All employees are encouraged to speak up if they feel impacted by customer or client representative behaviour.