

1 Policy statement

- 1.1 Occasionally, the behaviour or actions of customers makes it difficult for us to engage and interact with them, or to deliver our services. In a small number of cases behaviour becomes unacceptable.
- 1.2 When this happens, we may have to take action to protect our staff, contractors, other customers, or the wider business, who may be directly affected by the behaviour, or it may indirectly impact our ability to do our work or provide services to others.
- 1.3 We always aim to treat customers equitably, honestly, and consistently, including those whose actions may be considered unacceptable. Every customer has a right to be heard, understood, and respected, but that must be balanced with their responsibility to behave reasonably.

2 Statutory and Regulatory context

- 2.1 Rooftop will always adhere to the latest legislation, regulations and statutory guidance relating to the treatment and managing of customers, including:
 - Equality Act 2010
 - Human Rights Act 1998
 - Data Protection Act 2018 and GDPR
 - Health and Safety at Work etc Act 1974 (duty to protect employees)
 - Protection from Harassment Act 1997
 - Crime and Disorder Act 1998
 - Anti-social Behaviour, Crime and Policing Act 2014
 - The Regulator of Social Housing (RSH) Consumer Standards, specifically the Transparency, Influence and Accountability Standard and the Neighbourhood and Community Standard.
 - The Housing Ombudsman (HO) Complaints Code of Conduct and related guidance on Unacceptable Behaviour.
 - Relevant RSH judgements and HO findings.

3 Policy outline

- 3.1 This Policy aims to ensure that Rooftop protects colleagues, contractors and other customers from unacceptable behaviour whilst ensuring that customers continue to receive fair access to services.
- 3.2 This Policy defines what we mean by unacceptable or unreasonable behaviour and explains our approach to these situations.
- 3.3 This Policy applies to all our customer groups and all areas of our work.

3.4 Any action taken in line with this Policy will be lawful, fair, proportionate, evidence based and will be mindful of disability and vulnerability. Actions taken will be regularly reviewed and subject to appeal via the complaints process.

3.5 This Policy will not prevent customers from accessing our essential services.

4 Equality, Diversity and Inclusion: Principles

4.1 At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.

5 Disability and Vulnerability: Reasonable Adjustments

5.1 There are occasionally circumstances where we need to consider working outside of the parameters of this Policy. This may be where customers have disabilities and vulnerabilities that may lead us to consider reasonably adjusting the way we apply this Policy. In such cases, a referral should be made to the Complex Cases Review Group via the Head of Housing, where any approach outside of this Policy (and potentially other policies) will be considered and recorded, if agreed. This will always be considered in the context of the Assessing and Supporting Vulnerability Policy.

6 Data Protection: Principles

6.1 Rooftop recognises the importance of protecting the personal data of our customers, colleagues, contractors and other stakeholders and our commitment to compliance with data protection laws and managing personal data responsibly. As an organisation, we are committed to ensuring everything we do with personal data follows the principles of lawfulness, transparency, fairness and accuracy whilst minimising the amount of data we collect and only using it for specific, explicit and legitimate purposes until we no longer need it.

7 What is not unacceptable behaviour?

7.1 The following behaviour would not normally, on their own, be considered unacceptable or unreasonable behaviour:

7.1.1 Expressing dissatisfaction or making a complaint

7.1.2 Being upset, emotional or distressed

7.1.3 Disagreeing with a decision Rooftop has made

7.1.4 Persistently making enquiries where responses have not been provided in reasonable time in line with our respective response times

7.1.5 Requesting reasonable explanations or information

7.1.6 Using firm language without threats or abuse.

8 Behaviours that might be considered unreasonable or unacceptable include:

8.1.1 **Unreasonable demands:** Requesting large volumes of information, insisting on speaking with another colleague or refusing to engage with a colleague with no reasonable justification, imposing unreasonable timescales, asking for action on matters that are not within Rooftops responsibility or powers, insisting that matters are dealt with outside of policy or process.

- 8.1.2 **Unreasonable persistence:** Continuously adding to or changing the subject matter of a complaint, continuing to pursue the same issue when our complaints process has been exhausted without providing significant new evidence, refusing to accept an answer that has been given where the decision aligns with our policies and procedures and statutory and regulatory requirements, , , covert recording where this forms part of a pattern of harassment, intimidation or misuse of information.
- 8.1.3 **Verbal abuse, aggression, violence, harassment:** Not limited to actual physical or verbal abuse but also includes derogatory remarks, rudeness, inflammatory or libellous allegations, discrimination of any kind and threats of violence.
- 8.1.4 **Overload of letters, calls, emails or contact via social media:** Including the frequency of contact and the volume of correspondence received via any platform, as well as the frequency and length of telephone calls.
- 8.1.5 **Refusal to co-operate with us,** to engage with solutions offered or services provided, including providing access where co-operation would potentially support the customer, resolve their concerns, or enable us to fulfil our statutory responsibilities.

9 Actions we may take

- 9.1 Each case will be considered on its merits, considering the seriousness of the customers behaviour, the frequency of the behaviour, the impact on colleagues, contractors and other customers, the impact on Rooftops ability to deliver services and any prior history.
- 9.2 Any decision to impose restrictions will show due regard to the customers circumstances and known disabilities and vulnerabilities and their ability to access services including emergency and non-emergency repairs, complaints and statutory consultations.
- 9.3 Decisions will be based on objective evidence and may include correspondence, call recordings, incident reports, witness statements and notes recorded on our housing management system.
- 9.4 Where customer behaviour highlights safeguarding concerns either for the customer or for others, safeguarding procedures will be followed alongside this Policy.
- 9.5 Depending on the circumstances and behaviour of the customer we may take more formal action. Each case is individual and therefore measures considered could include but are not limited to:
- Appointing a specific point of contact for the customer.
 - Limiting communication to a specific format – for example in writing only.
 - Limiting communication to specific times, days, or frequencies.
 - Limiting the number of issues that will be considered in a specific period.
 - Replying to all matters on a set frequency (for example, every 10 days).
 - Applying appropriate warning flags on the customer's account.
 - Banning customers from entering Rooftop offices or enforcing visits by appointment only.
 - Stopping all communication with a customer about a specific issue (unless new significant information is available).
 - In exceptional circumstances, notifying relevant public authorities, including the police.

- In extreme cases, applying for an injunction to limit contact.

9.6 We may refer a case to our Complex Case Review Panel where behaviour following intervention from one or multiple departments has resulted in no improvement in behaviour.

10 Imposing Restrictions

10.1 In the first instance we will warn the customer about their behaviour, explaining why we find it unacceptable or unreasonable and requesting that they improve their behaviour in future contact with us. This may be done verbally, but will be followed up in writing, explaining what behaviour was found to be unacceptable or unreasonable and why, as well as explaining our expectations for future contact. Correspondence should also set out actions we may take if behaviour continues to be unacceptable or unreasonable

10.2 Where it is decided that formal action must be taken, we will inform the customer in writing (letter or email) and a note will be placed on our records to this effect. The letter will explain the appeals process, should the customer wish to challenge the decision or restrictions imposed.

10.3 The decision to take formal action can be taken by any customer facing manager. Advice and guidance will be provided by Operational Heads of Service, including any restrictions imposed.

10.4 The customer can appeal any decision by raising a formal complaint, which will follow the complaints process and will be managed by Rooftops Complaints Resolution team. Any restrictions will be maintained until the complaints process is exhausted.

11 How long restrictions remain in force

11.1 We normally impose restrictions for a maximum period of one to three months. At the end of this period, the restrictions will be reviewed and if they remain in place, reviews will take place every one to three months. Consideration will be given to lifting restrictions where the customers behaviour has improved, and they have complied with the restrictions. Restrictions should not remain indefinitely without reasonable documented justification.

11.2 If after reviewing, the decision is made not to lift any restrictions, an explanation should be provided to the customer as to why the restriction remains, how long for and what the next review date will be. This can be communicated with the customer in line with the customer's communication preferences.

12 Equality and diversity, and reasonable adjustments

12.1 We understand that some customers may find it difficult to express themselves or communicate clearly, especially when they are anxious or distressed. We will consider whether unacceptable behaviour may arise from disability, neurodiversity, learning disability, mental health, dementia, trauma or other protected characteristics and whether reasonable adjustments may improve the behaviour before imposing restrictions.

12.2 We will always consider requests for reasonable adjustments to help customers access our services. We ask that wherever possible, customers explain what adjustments they need and how those adjustments would support them, so that we can work with them to put those reasonable adjustments in place.

12.3 Examples of adjustments we can consider are:

- using different methods of communication.

- providing written communications in large print, on coloured paper.
- providing translated copy of our policies and communications.
- giving clear warnings if conversations become unproductive and allowing customers the opportunity to improve their behaviour before ending a call.

12.4 We may still use this Policy to manage customer interactions even where a reasonable adjustment has been made.

13 Representation and Advocacy

13.1 Where restrictions are in force it may be appropriate for other individuals to represent the customer for the period - for example a family member, friend or support worker. Please refer to the Complaints Policy regarding the use of advocates.

14 Colleague Support

14.1 Following incidents, Rooftop will ensure colleagues are appropriately supported including debriefing, wellbeing support and reporting criminal behaviour.

15 Review

15.1 This Policy will be reviewed every three years unless there are major changes in legislation or good practice.

16 Consultation

16.1 Leadership Team subgroup July 2026

16.2 Executive Team July 2026

17 Responsibilities

Responsible body

17.1	Formulation, amendment and approval of policy	Executive Team
	Monitoring of policy	Leadership Team
	Operational management of policy/policy author	Head of Housing

17.2 **Date of formulation of policy** July 2023

17.3 **Dates of policy reviews** July 2026

17.4 **Date of next review** July 2029

Appendix 1

Associated documents

Internal – Rooftop policies and procedures

- Customer Complaints Policy