

## CONTACT MANAGEMENT PROCEDURE



### MONITORING INFORMATION:

<b>POLICY/PROCEDURE/STRATEGY:</b>	<b>CONTACT MANAGEMENT PROCEDURE</b>
<b>DATE APPROVED:</b>	<b>JUNE 2023</b>
<b>EXPIRY DATE:</b>	<b>JUNE 2026</b>
<b>OWNER:</b>	<b>PSL &amp; TENANCY SUSTAINMENT MANAGER</b>
<b>APPROVAL ROUTE:</b>	<b>EXECUTIVE MANAGEMENT TEAM</b>

# Contact Management Procedure

## 1. Introduction

This procedure supports the Contact Management Policy, which defines what Teign Housing considers to be unacceptable behaviour, or the risk of unacceptable behaviour towards its employees and contractors.

## 2. When to use this procedure

This procedure should be used when an employee or contractor has been or is likely to be at risk of unacceptable behaviour when attending or interacting with a customer.

Concerns should always be discussed with line managers to agree on what appropriate steps can be taken to alleviate any risk to a member of staff. You should also refer to the Lone Working Policy and Health and Safety Policy to address and minimise any associated risks.

## 3. What is defined as unacceptable behaviour

### **Aggressive or Abusive Behaviour**

Aggressive or abusive behaviour is not confined to physical acts. It is defined as behaviour or language which causes someone to feel afraid, threatened or abused. Such behaviour may therefore be verbal. Examples of this type of behaviour would be:

- Threats of violence
- Actual physical violence
- Personal verbal abuse
- Derogatory remarks
- Rudeness
- Inflammatory statements
- Unsubstantiated allegations

### **Unreasonable Customer Demands**

Some customers may take up a disproportionate amount of employee time owing to unreasonable customer demands. Examples of this would include:

- Requesting an unreasonable amount of advice or information
- Providing an unreasonable amount of information
- Repeatedly approaching us about the same issue(s)
- Insisting on seeing or speaking to a specific member of staff
- Continual telephone calls, emails, letters etc
- Repeatedly changing the subject of a complaint, anti-social behaviour case etc
- Persistently failing to follow Teign Housing's complaints policy and procedures

### **Unreasonable Persistence**

This behaviour may arise when a customer pursues an issue even though we have made it clear that we have done all that we can to resolve the case. In extreme cases, unreasonable persistence may amount to harassment. Examples would include:

- Pursuing a complaint vexatiously (i.e. either with the intent to cause additional workload for employees, and/or with insufficient evidence to prove their case)
- Persistent refusal to accept a decision we have made
- Persistent refusal to accept an explanation as to what we can and cannot do in order to resolve an issue
- Requiring a disproportionate amount of employee time owing to the persistent pursuit of an issue, with no intent of resolving the issue

## **4. The risk of unacceptable behaviour towards staff**

Employees and contractors may be put at risk when carrying out housing management activities such as property inspections, repairs, or interviews. Teign Housing recognises that many customers we support and accommodate have underlying health issues or complex needs which can attribute to unacceptable behaviour and increase the risk of unacceptable behaviour towards staff. Examples include:

- Poor mental health
- Personality disorder
- Alcohol misuse
- Drug misuse

A situation or circumstance can also increase the level of risk to an employee or contractor.

Examples include:

- Domestic Abuse
- Managed offenders
- Anti-social behaviour
- Safeguarding concerns
- Exploitation (CSE, or Organised Crime)
- Dangerous dog

Occasionally Teign Housing will receive information from third-party agencies such as the local authority, Police, or specialist services. Based on the information provided by the agency we may decide to invoke an alert on our housing management system to ensure safe working practices for both employees and contractors.

## **5. Managing unacceptable customer behaviour**

We will use a range of options to manage unacceptable customer behaviour, which will be proportionate to the behaviour exhibited. For example, we may take legal action in cases of actual or threatened violence towards employees or contractors, but this may not be appropriate or proportionate in other instances of unacceptable customer behaviour. If we are satisfied that an incident of unacceptable customer behaviour has occurred, it is not always the case that a sanction is proportionate or appropriate. Addressing the behaviour via other options such as warnings and/or mediation may be more constructive. The options we will consider will include the following (although this is not intended to be an exhaustive list):

- Legal action including injunctions or possession proceedings
- Restricting contact methods available to the customer (e.g. written contact only)
- Ending all direct contact and only allowing contact via an agreed third party
- Restricting or removing access to our offices
- Restricting customer contact to certain days and/or times
- Restricting the people who may be contacted to named individuals
- Allowing contact by prior appointment only
- In cases of actual or threatened violence, we may (with the employee's consent) inform the Police who may wish to instigate criminal proceedings
- Warning the customer that any further instances of unacceptable behaviour will result in a sanction

- Engaging with a mediation service
- Restricting or removing the customer's ability to participate in formal and informal resident involvement structures.

## 6. Procedure

The procedure contains both a formal and informal process to ensure that decisions which affect a customer's access to service are made at an appropriate level. This is for the protection of both staff and customers and ensures that any action taken is consistent and fair.

## 7. Decision

The relevant Head of Service (Leadership Team) will decide to impose a contact management alert in conjunction with the appropriate departmental manager where the alert will impact the service received by the customer i.e., Visit in Pairs. In the absence of the relevant Head of Service, another member of the Leadership Team can make this decision. It is the responsibility of the Operational Leads/Front-line Officers to communicate this decision to the customer. Refer to Appendix F – Decision Letter.

Only alerts which require a two-person attendance or an adjustment to how we communicate and provide a service to a customer will require a decision letter these include:

- Visit in Pairs
- Dangerous Dogs
- Contact Management
- No Lone Females
- No Lone Males
- No Female Visitors
- No Male Visitors
- Weapons

## **8. Alerts**

Contact management alerts which impact the level of service provided to a customer will be reviewed at least once annually (every 12 months). Some will be reviewed on a more regular basis should there be an increase in customer contact, breach of tenancy conditions or safety and welfare issues including safeguarding. These reviews are conducted by the Operational Leads.

Alerts will be removed should the risk of harm or likelihood of harm to an employee or contractor be reduced. This is at the discretion of the staff member responsible for the alert.

Refer to Appendix B – SSRS report for All Alerts to locate review periods for Alerts

## **9. Appeals**

Customers should write to us within 28' days of receiving notification that an alert has been imposed on them with reasons why wish to appeal the alert. This will be passed to the relevant Head of Service to review. The Head of Service will be required to correspond back to the customer within 28' days of receiving the appeal with their decision and findings.

See Appendix F – Determination letter of appeal

## **10. Vulnerability**

Any vulnerabilities made known to us by a customer will be considered before deciding to invoke an alert which will impact the level of service received from Teign Housing.

Reasonable adjustments may be considered but these must be both appropriate and proportional in relation to the services being delivered. We are happy to liaise with support agencies who are acting on your behalf to achieve these outcomes.

## 11. Recording

Operational Leads will ensure that all cases of unacceptable customer behaviour or the risk of unacceptable behaviour are monitored and recorded via Civica Cx at least once annually for audit purposes.

These details will be kept on a relevant file, and sanctions imposed will be flagged on the Housing Management database (CX), in accordance with data protection principles and legislation.

It is the responsibility of all employees and line management to report any incidences as they occur on the Assure database and to update Civica Cx.

To ensure fairness, consistency and proportionality when managing unacceptable customer conduct, the characteristics of customers will be recorded and monitored to ensure no group or individual is discriminated against.

## 12. Monitoring

Organisational Leads will regularly monitor all customer contact within Teign Housing in order to identify those customers with high levels of contact and develop individual customer contact strategies to reduce this.

Organisational Leads will also be responsible for undertaking periodic monitoring and reporting.

## 13. Data Protection

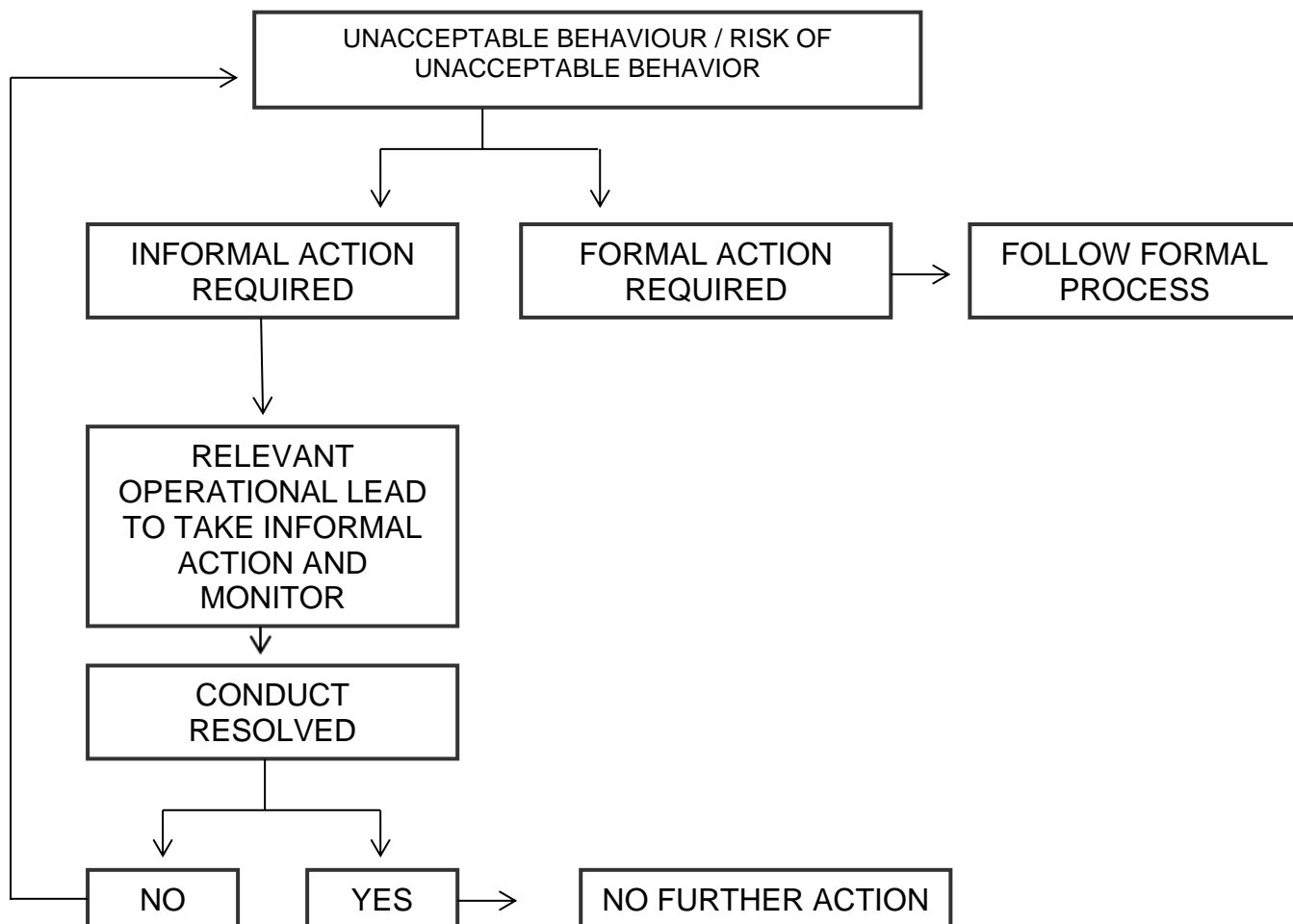
All details and documentation relating to information recorded under this procedure will be retained while the person is subject to sanction(s). When a sanction is removed, all details will be retained for a period in accordance with the organisational data retention policy.

Under the UK Data Protection Act 2018 and EU GDPR, any individual is entitled to request access to their personal information that is held by Teign Housing. Any request will be dealt with in accordance with the rights of the data subject.

## Appendix A – Informal Action

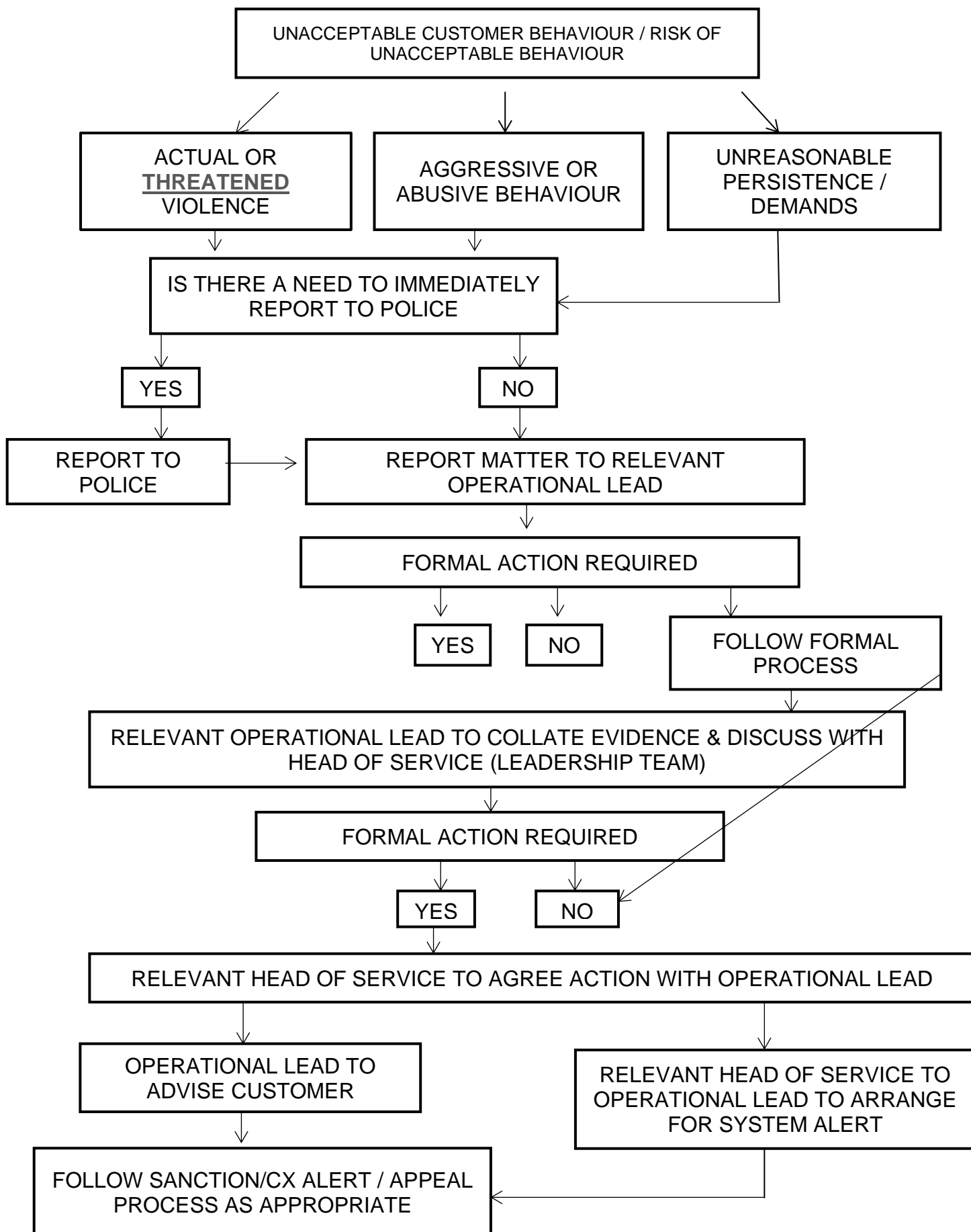
In some instances, one-off informal action may be the appropriate course of action to take.

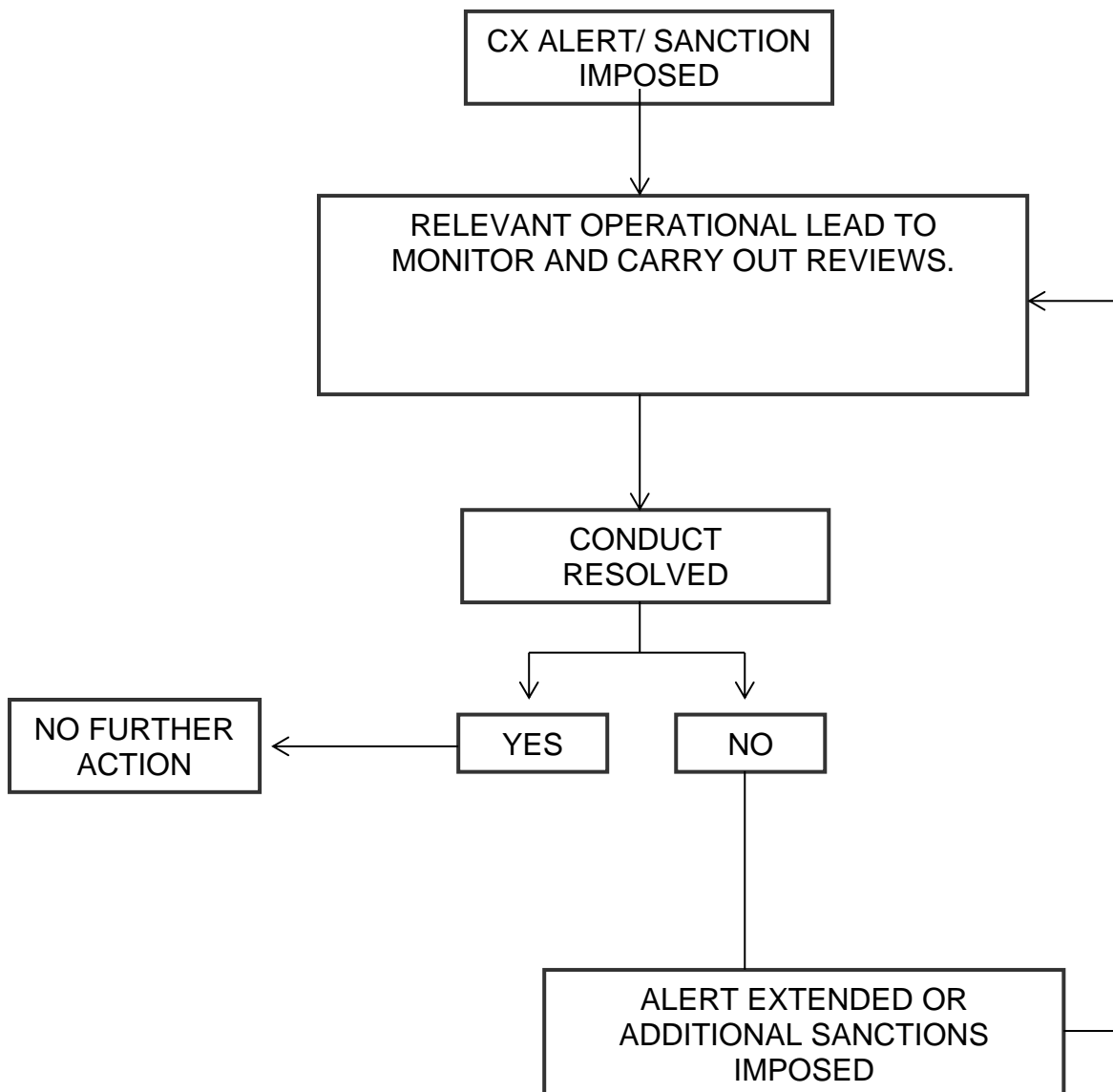
This can be taken locally to resolve unacceptable conduct.

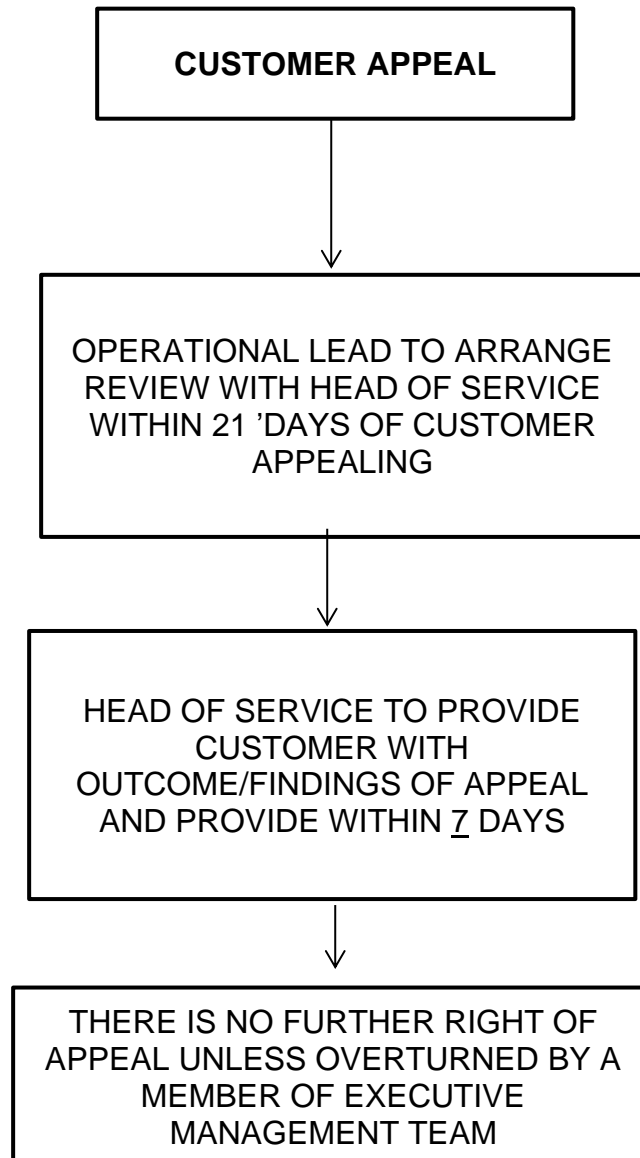




**Appendix B – Formal Action**



**Appendix C – Reviewing an alert**

**Appendix D – Alert Review**

## Appendix E – Guidance on Unacceptable Customer Conduct

**1.0** The table below offers guidance on behaviours which might be construed as unacceptable and sets out the initial stage of the process the matter could be handled at:

Behaviour	Definition	Possible Action
<b>Discrimination</b>	Failure to afford equal respect to an individual based on disability, gender, race, religion, age, sexuality, and marital status.	Formal
<b>Harassment</b>	Behaviour which is unwanted and offensive and affects the dignity of the individual or group of individuals. Harassment is also defined as actions by a customer who because of their frequency or nature, hinder Teign Housings' interaction with the customer.	Formal
<b>Unreasonable</b>	Customers who request complex information without apparent or good reason may be acting in an unreasonable manner.	Informal
<b>Continuous Unreasonableness</b>	Customers who continually request complex information without apparent or good reason may be acting in an unreasonable manner.	Formal
<b>Vexatious</b>	Acting in a manner so as to cause annoyance or irritation without the intention of resolving their query.	Formal
<b>Bullying</b>	A type of harassment which consists of persistent actions, criticism or personal abuse in public or private which humiliate, intimidate, frighten or demean the individual	Informal / Formal
<b>Threat of violence</b>	The intentional use of threatened physical against oneself, another person, or against a group or community, which either results in or has a high likelihood of resulting in injury, death, psychological harm, mal-development, or deprivation	Formal
<b>Aggressive</b>	A form of physical or verbal behaviour leading to self-assertion; it is often angry and destructive and intended to be injurious, physically or emotionally, and aimed at domination of one person by another	Informal / Formal
<b>Intimidation</b>	The act of intimidating a person to make them do something	Formal

## 2.0 Application of sanctions

2.1 Sometimes we deal with customers who exhibit certain behaviours; or very difficult life circumstances; or may feel very frustrated by our systems and processes. The application of any alert which denies access to a service should be seen as an action of last resort. All possible efforts should be made to find a resolution which does not deprive service.

2.2 There are different sanctions and conditions available to be used. For example, a member of staff taking a call from a customer exhibiting unacceptable behaviour may give a warning to a customer to moderate their behaviour or their call will be terminated. However, that member of staff cannot apply any further sanctions on that customer such as advising the customer that they will only be able to speak to the manager in future.

## 3.0 Staged process

### 3.1 Informal Action

The member of staff receiving unacceptable behaviour either on the telephone, face-to-face or via email can:-

- Politely explain that Teign Housing expects its staff to be treated with respect and ask them to moderate their behaviour
- If the behaviour continues the employee will give a warning of further action appropriate to the method of contact (e.g. warning that the telephone call will be terminated or being asked to leave the premises)
- Staff should clearly explain to the customer why they are terminating contact such as *'I'm finding your behaviour to be inappropriate; I've no option but to terminate this call.'*
- If the customer does not moderate their behaviour after this warning the threatened action should be taken

The circumstances of the incident and the date and time should be recorded and reported to the line manager. The incident should be recorded on the housing management system (CX) and as an Incident Report on Assure. This will be used to support any decision to take formal action.

Staff members should always refer behaviours which they believe are unreasonable to their line manager as the manager will judge what actions should be taken in these cases. Staff are not authorised to apply sanctions for this type of behaviour.

### 3.2 Formal Action

The relevant Operational Lead will: -

- Investigate the case and following discussions with the staff member and customer, discuss the case with the Head of Service and decide whether further action is required.

The Head of Service will:

- Contact the Operational Lead and agree the action to be taken. The following are examples of sanctions that could be used:
  - Restricting contact to a particular form (e.g. telephone). This would mean suspending all contact which is not in the designated form for a period of time.
  - Limiting permissible contact to certain times and/or days
  - Specifying a named officer to be the sole point of contact for the customer (otherwise known as a single point of contact)
  - Asking the customer to enter into an agreement about their future behaviour

The Operational Lead will:

- Notify the customer, in writing, of the decision and what they can do if they disagree with the action taken. The Operational Lead will keep a record of the investigation and its outcome.
- Should the customer Appeal against the action(s), prepare the Appeal for review by the Head of Service.

## 4.0 Violent and aggressive behaviour

4.1 If a customer has behaved in a manner which is judged to be violent or aggressive towards a member of staff an employee should: -

- Terminate the interaction with the customer
- Take actions to ensure their own safety and the safety of other staff
- If the behaviour is perceived to be so threatening that the safety of the employee and others is at risk the Police should be contacted
- Report the incident to their line manager

**Sanctions that could be undertaken include:**

- Suspending services to the customer for a specific period of time
- Exploring whether further legal action should be taken
- Requiring the customer to provide a written declaration that they will not act in such a manner again in the future before service is resumed
- Applying any of the other sanctions and conditions of contact as set out in the formal stage.

Consideration should also be given to placing an “Alert” marker against the customer on the Housing Management System Civica Cx.

**5.0 Failure to comply with sanctions**

- 5.1 In extreme cases where the customer behaves in a persistently unacceptable manner despite sanctions and conditions of contact being applied, then legal action for breach of tenancy should be taken.

## Appendix F – Letter Template Example (Alert added, removed, appeal outcome)

### Contact Management Alert - Notification to Tenant [DELETE AS APPROPRIATE]

We are writing to you regarding your behaviour towards a member of staff/contractor, who recently attended your property to carry out repairs/a home visit. You were found to be both confrontational and aggressive, and you raised your voice making the operative feel intimidated and subsequently leave. (type of incident and the impact)

This behaviour is unacceptable and in accordance with our Contact Management Policy, we will ensure any future visits from members of staff and contractors will be carried out in pairs.

This will subsequently mean a Visit in Pairs (type of alert) alert will be placed on our system for the safety of our employees and contractors. We review our alerts annually and should the risk to members of staff and contractors be alleviated through improved conduct then the alert will be removed. Please note that appointments carried out in pairs can increase the wait time for repairs or appointments.

You may want to reflect on this matter and provide an apology to the member of staff affected. This would be regarded as a positive step to improving your conduct.

Should you wish to appeal the decision to place an alert on your record please raise this within 28 days of receiving this letter including any supporting information.

### Contact Management Alert – Notification of Alert review outcome [DELETE AS APPROPRIATE]

We are writing to you/pleased to confirm that a decision has been made to remove the /remain with alert recorded against your file [select alert as appropriate]. This is because we have received no further complaints relating to your behaviour/we continue to be concerned that your behaviour has not yet improved.

[EVIDENCE DETERMINATION]

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As a result, we no longer require two people to visit your address when carrying out home visits, repairs, or compliance checks.



You have the right to appeal this decision. To do so, please respond within 28' days to [customerhub@teighousing.co.uk](mailto:customerhub@teighousing.co.uk) providing supporting information to support your appeal.

### **Contact Management Alert – Notification of Appeal outcome**

We are writing to you to confirm the outcome of your appeal to have the alert [name of alert] removed from your file. This appeal was reviewed, and a decision was made by [Name and Title].

On reviewing the supporting information submitted with your appeal, and the evidence provided by the Operational Lead the decision has been made to remove the/remain with alert on file.

#### **[Bases for decision]**

Please note that [name of alert] alerts are reviewed every 12 months by the Operational Lead. You will therefore receive future correspondence from us, should following a review the alert is removed or a decision is made to continue with this alert on file.

## Appendix G – SSRS Alert report:

Contact Name	Group Name	Asset Reference	Asset Address	Effective From Date	Review Period	Latest Review Completion Date	Review Due Date	Review Last Evaluated	Overdue
				29/11/2019	12 Months	31/03/2023	31/03/2024		No
				29/11/2019	12 Months	01/04/2023	01/04/2024		No
				19/01/2021	12 Months	21/03/2023	21/03/2024		No
				21/01/2021	12 Months	05/04/2023	05/04/2024		No
				14/05/2021	12 Months	21/03/2023	21/03/2024		No
				25/08/2021	12 Months	05/04/2023	05/04/2024		No
				16/02/2022	12 Months	17/02/2023	17/02/2024		No
				16/02/2022	12 Months	17/02/2023	17/02/2024		No
				31/08/2022	12 Months		31/08/2023		No
				27/10/2022	12 Months		27/10/2023		No

Using the TM060 All Alerts report in SSRS. You can view all alerts imposed as per the Contact Management Policy and Procedure. Data fields will show you the frequency each alert must be reviewed, if it's overdue, and the last completion date it was reviewed. These reports can be subscribed to and run monthly.