

Unacceptable Behaviour Policy

Lead Director: Assistant Director of Housing and Communities

Reference: POL 47

SMT Approval: 16/09/26

Review Date: August 2029

Introduction & Aim

- 1.1 At Cobalt Housing, we are dedicated to delivering high-quality homes and services to our customers, ensuring that every contact counts with a strong emphasis on fairness and respect. We also expect our colleagues to be treated with the same level of respect as they work to support and serve in our communities.
- 1.2 We are committed to treating all customers fairly, including those whose actions are considered unacceptable or unreasonable. Customers are expected to engage with Cobalt respectfully, and where this does not happen, we will take timely and proportionate action to safeguard colleagues and maintain effective services.
- 1.3 It is difficult to deliver services effectively where there is unacceptable behaviour towards our colleagues, unreasonable demands on our service, or levels of contact. We aim to protect the health, safety and wellbeing of our colleagues who have a right to do their jobs without fear of being abused or harassed.

2. Policy Statement

- 2.1 This policy sets out how we identify and manage these types of behaviours and how we communicate this to customers. It applies to all methods of contact including telephone, face to face, letters, e-mails, social media, and all other digital channels.
- 2.2 Cobalt Housing believes that anyone who expresses dissatisfaction or raises a complaint has the right to be heard, understood, and respected. We do not view behaviour as unacceptable just because someone is assertive or determined. In fact, we accept that being persistent can be a positive advantage when pursuing a complaint.

- 2.3 However, it also recognises that in a minority of instances, the actions of customers who are unacceptably angry, demanding or excessively persistent may result in unreasonable demands or unacceptable behaviour towards our staff and contractors. It is in these circumstances that we will take appropriate action that is proportionate to the level and extent of behaviour.

3. Policy Principles

- 3.1 We will ensure that we consider each case individually before taking any form of action.

- 3.2 We always try to work positively with individuals to resolve issues. We will:

- Listen carefully and try to understand concerns
- Offer support where mental health, disabilities or communication needs are identified
- Consider any reasonable adjustments where appropriate

- 3.3 We ask all customers to respect the fact that colleagues are delivering services on behalf of Cobalt Housing and therefore this may not reflect their own views.

Equality, Diversity, and Inclusion

- 3.4 Cobalt will not discriminate against anyone based on race, colour, ethnic or national origins, religion, sexual orientation, disability, gender reassignment, pregnancy, or age, in accordance with the Equality Act 2010. We recognise that people may behave differently due to mental health issues, learning difficulties, disability, language barriers, or cultural differences.

- 3.5 We will:

- Make reasonable adjustments wherever possible.
- Encourage involvement of support networks or advocates.
- Use translation or interpretation services where appropriate.
- Consider safeguarding referrals if necessary.

Cobalt's Commitment to Reasonable Adjustments

3.6 We understand that some customers may find it difficult to express themselves or communicate clearly, and where applicable, we will always consider making reasonable adjustments for our customers.

3.7 Examples include but are not limited to:

- Using different methods of communication.
- Providing written communication in large print, coloured text, or translations.
- Give clear warnings if conversations become unproductive and allow customers the opportunity to modify their behaviour before ending a call.
- We will consider if there are other individuals that may be able to represent the customer in the handling of their complaint, for example a family member, friend, or support worker.
- We will consider if a multi-agency approach is necessary when the individual is receiving support from other professional bodies such as social services.

3.8 Even with reasonable adjustments, we may still apply our policy if actions or behaviours negatively affect our staff or work. Any restrictions imposed on a customer's contact will recognise and be appropriate to their individual circumstances.

Definitions of Unacceptable or Unreasonable Behaviour

3.9 Unacceptable behaviour can vary in each situation; it does not have to be abusive or aggressive to be considered unacceptable or unreasonable.

- 3.10 Cobalt Housing has adopted the Housing Ombudsman definition of unacceptable or unreasonable behaviour as:

‘Behaviour may become unacceptable if it is so demanding or persistent that it places unacceptable demands on the landlord and impact the level of service that can be offered to others.

Unreasonable demands and persistence

- 3.11 A demand can become unreasonable when it has or would have a significant impact on our ability to deliver our services. Examples include

- Requesting large volumes of information.
- Asking for responses within a short space of time.
- Refusing to speak to an individual (without valid reason).
- Insisting on always speaking to the same person or making repeated contact regarding issues that are outside of Cobalt Housing’s area of responsibility.
- Refusing to accept the answer provided.
- Continuing to raise the same subject matter without providing new evidence.
- Continuously adding to or changing the subject of a request or issue raised.

Verbal abuse, aggression and /or violence

- 3.12 We understand that customers may feel upset and angry about issues they have raised with us. However, we will not tolerate behaviour that escalates into abuse, violence, aggression, or discrimination towards our colleagues. Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether verbal, written, online or in person) that may cause staff to feel offended, afraid, threatened, or abused. Examples include:

- Derogatory or discriminatory remarks.
- Personal insults or rudeness.
- Inflammatory allegations.
- Verbal or physical threats of violence.

- Shouting or swearing.

Unacceptable and unreasonable levels of contact

3.13 Volume and frequency of contact from customers can place an unnecessary strain on resources and impact on our ability to deliver services. We consider the level of contact to be unreasonable when it impacts our ability to respond to or deliver services to our customers. Examples include:

- Overload of incoming letters, calls, emails, or contact via social media.
- Frequency of contact and the length of messages, letters, emails, or phone calls.

Abuse of social media communication

3.14 Social media is an important channel of communication for Cobalt Housing and our customers, and we use it to share information relevant to customers and stakeholders. Our channels encourage engagement and comment; but this can sometimes be abused or used inappropriately. We aim to protect all colleagues' reputations from any form of personal abuse. We will not tolerate offensive, abusive or unacceptable posts mentioning Cobalt Housing colleagues by name.

3.15 Examples include:

- Persistently and/or excessively posting derogatory or inflammatory comments on posts on Cobalt Housing accounts.
- Contact colleagues using their personal details or personal social media accounts.
- Publishing personal or confidential information about colleagues online either in comments, photographs or video footage.
- Making abusive, offensive, inflammatory, or discriminatory comments or accusations about colleagues online.

- 3.16 Cobalt Housing is not responsible for comments made by third parties on our channels and reserves the right to delete or hide offensive posts to limit offence to visitors to our social media accounts. We also reserve the right to block persistent offenders who post inappropriate comments on our channels.

Recording Cobalt Housing colleagues and partners

- 3.17 We understand that customers interact with our colleagues and partners on a regular basis, but we do not allow our customers to:
- Film colleagues without their consent when they visit their homes or are carrying out their duties in the community.
 - Record conversations with colleagues without notifying them in advance they are being recorded.
 - Colleagues have the right to refuse to be filmed or recorded and can remove themselves from the situation.
- 3.18 Colleagues are permitted to refuse permission to be filmed or recorded. They may disengage with customers who record them without notification or permission. They may also request that customers delete any video, image, or recording of them.

Unwanted attention and harassment

- 3.19 Colleagues of Cobalt Housing have the right to carry out their duties free from unwanted attention, harassment or threats of harassment.
- 3.20 Examples include:
- Unwanted physical contact.
 - Sexual comments, or any behaviour of a sexual nature.
 - Stalking behaviour.

- Sharing personal, sensitive, or confidential information about staff online or other public domains such as noticeboards or newsletters.
- Behaviour towards our staff makes them feel humiliated, intimidated or offended.

Discriminatory behaviour

- 3.21 We consider unfair treatment of colleagues based on race, gender, age, disability, sexual orientation, religion, or other protected characteristics as discriminatory.

Managing unacceptable or unreasonable behaviour

- 3.22 If we consider someone's behaviour is unreasonable or unacceptable, we will always inform customers why we consider their behaviour to be unacceptable and support them to moderate their behaviour to allow Cobalt to continue to provide a service.

Action we may take

3.23 Informal Action

Informal action could include temporary measures such as terminating a phone call or walking away from a face-to-face interaction. Where possible, the colleague member will inform the customer why their behaviour is unacceptable before deciding to terminate the contact. This will then be followed up by a warning verbally or in writing.

3.24 Approval of Action

Where informal action fails and the customer continues to demonstrate unreasonable behaviour, a decision will be made by the Neighbourhood Manager

on next appropriate steps. They must review the information relating to the case and approve or decline the recommended formal action. This must be documented and recorded alongside evidence to support the decision on our housing management system.

Formal action will never restrict access to emergency repairs or essential services required by the customer to live safely in their home.

3.25 Formal Action / restrictions

Any restrictions that we impose on a customer will be evidence-based, appropriate and proportionate to the behaviour, the level of risk and the impact on colleagues, contractors, customers or services.

In most cases, restrictions will apply between 6 and 12 months; in serious, extreme or repeated cases this may be longer where the evidence supports it and the restriction remains necessary to manage risk

Below are some of the formal actions that Cobalt Housing may take depending on the nature of the behaviour and individual customer circumstances.

- Place limits on contacts with colleagues at a specified time, e.g. day, week, or month.
- Limit the channels of contact, for example, in person, telephone, letter, or email.
- Communication via a third party, for example family member, friend or support worker or advocate.
- Appointing a single point of contact (SPOC). All correspondence with Cobalt Housing would have to be made via the SPOC who will remain in regular contact with the customer at agreed intervals
- Allowing face-to-face contacts to only take place in the presence of a witness and in a suitable location.
- Restricting access to our premises.
- Blocking individuals from responding to our social media posts.
- Asking the customer to enter into an agreement about their conduct.

3.26 Cobalt Housing will issue a formal letter explaining why the customer's behaviour is unreasonable, in line with this policy. The letter will include:

- Why we have taken the decision and examples to support.
- The specific action being taken (see above).
- The duration of the restriction.
- Whether the action applies to all the customers dealing with us, or whether the action specifically relates to the issue in question.
- How and where to report any emergency incidents.
- A copy of this policy will be enclosed with the letter.

3.27 A record of the action will be placed on our Housing Management system to inform colleagues of the decision, where appropriate, so that there is a consistent and coordinated approach that is taken across the organisation.

Urgent or extreme cases

3.28 Consideration should be given to whether we should take further action. This may include involvement of the police or legal action, where it is believed the customer has committed a criminal offence, such as harassment, assault on staff or criminal damage. A marker will be placed on our Housing Management system if a customer is violent or aggressive. These markers are applied for staff safety, based on recorded incidents, and will be reviewed regularly in line with UK GDPR. A letter will be issued to the customer confirming this, detailing the reasons why. Any cases being considered for legal action should be approved by the Assistant Director prior to commencement. In the absence of the Assistant Director, the Successful Tenancies Manager will consider and approve.

Duration and review of restrictions

3.29 Any restrictions that we impose on a customer will be appropriate and proportionate. In most cases, restrictions will apply between 6 and 12 months; in extreme or repeated cases this could be longer.

- 3.30 Where restrictions are placed on a customer, they will be entitled to one instance of appeal against that decision. The appeal must be presented in writing with supporting evidence within 10 working days of restrictions being put in place.
- 3.31 The appeal will be considered by an Assistant Director who has not previously been involved with the customer.
- 3.32 We will inform the customer of the outcome of the appeal within 10 working days.
- 3.33 When the restrictions are due to expire, the behaviour of the customer will be reviewed by the Neighbourhood Manager and a decision will be made to either extend, amend or remove the restrictions based upon the evidence available.
- 3.34 The customer will be informed of the outcome within 10 working days.

4. Risk Management

The key risk associated with non-delivery of this Policy is:

Risk Register Ref:	Risk:
ST 04 Health & Safety	There is a risk that failure to identify and implement an effective Unacceptable Behaviour Policy will result in the following consequences.
Risk Consequences:	Management and Mitigation:
• Failure to identify and appropriately manage those displaying unacceptable behaviour could compromise the health and safety of other customers, colleagues and contractors. • In circumstances of extreme behaviours this could impact on the broader neighbourhood leading to increased anti-social behaviour and reduced demand for housing in the area. • Reputational damage.	• This Policy which provides clarity to all who refer to it what constitutes unacceptable behaviour. • Identified controls and processes to address unacceptable behaviour when it arises. • Trained staff who can identify, manage and escalate concerns as they arise. • Partnership working with Police and others, where necessary. • Personal safety devices in place and regular training and refresher briefings conducted.

5. Regulatory & Legislative Compliance

- Health & Safety at Work Act 1974
- Managements of Health & Safety and work regulations 1999
- Corporate Homicide and Corporate Manslaughter Act 2007 Act
- Equality Act 210
- The General Data Protection Regulation (GDPR) and Data Protection Act 2018
- Care Act 2014
- The Housing Ombudsman's Complaint Handling Code 1st April 2022, revised April 2024.

6. Links to Other Key Documents

- POL 09 Health and Safety Statement 2024
- POL 26 Dignity at Work Policy
- POL 06 Complaints Policy
- POL 82 Cobalt Colleague Privacy Policy
- Customer Strategy

7. Governance of this Policy

Equality Diversity & Inclusion (ED&I)	An Equality Impact Assessment (EQIA) was completed Date 13/10/25
Financial and Links to VfM	There are no financial impacts of this policy, including any identified VFM impacts.
Privacy and Data Protection	Any data or personal information used in connection with this policy will be managed in compliance with the GDPR and DPA Act 2018
Health and Safety	Failure to comply with this policy has the potential to impact the Health and Safety of colleagues during their day-to-day work. This policy aims to deter unacceptable to unreasonable behaviour.
Development and Consultation	Customers and stakeholders were consulted Date: 14/10/25 A summary of the findings, and where consultation has influenced the policy is detailed within the policy checklist QR COB 0058

8. Definitions

Customer - A customer is anyone who interacts with Cobalt Housing, for example, a person entered into a rental agreement with us, a customer's representative, a member of the public, or anyone who has a relationship with Cobalt Housing or partner organisations operating on our behalf.

The logo is centered within a white circle. The word "Cobalt" is written in a large, bold, dark blue sans-serif font. Below it, the word "Housing" is written in a smaller, dark blue sans-serif font, preceded by three small dark blue squares.

Cobalt
■■■ Housing