Unreasonable Customer Behaviour Policy

What is unreasonable customer behaviour and how do we respond to it?

1. Scope

This policy applies to all Yorkshire Housing customers and anyone acting on their behalf. It covers behaviour towards Yorkshire Housing colleagues, contractors and representatives across all contact channels and locations, including telephone, email, written correspondence, digital channels, offices, customers' homes and community settings.

The policy applies to the behaviour and its impact, not to the customer personally. It does not prevent customers from raising concerns, making complaints, asking for reasonable adjustments or challenging a decision through the appropriate process.

2. Policy Statement

We treat customers fairly, respectfully and consistently. We know people may contact us when they're distressed, frustrated or going through a difficult time. We'll listen and consider their circumstances, including needs they've shared through our customer census or other contact with us. We'll consider support and make reasonable adjustments where needed, in line with our Accessible Services Policy and Additional Needs Policy.

Everyone has the right to be heard, and our colleagues have the right to work without fear, abuse or unreasonable demands. We will not accept behaviour that causes distress, fear or disruption, places excessive demands on colleagues or services, or prevents us from resolving issues effectively.

This policy explains how we manage unreasonable behaviour at Yorkshire Housing and Space Homes. We'll respond fairly, taking account of the customer's circumstances and the impact of their behaviour. Any action must be proportionate: it must address the concern without going further than needed. Our aim is to protect colleagues, keep services running and resolve issues wherever possible. Customers will still be able to access essential housing services. Legal action will only be a last resort.

This policy should be read alongside the Customer Feedback Policy, Accessible Services Policy, Additional Needs Policy and the Unreasonable Customer Behaviour Process and Guide.

3. Policy Aims

This policy aims to:

- Define what Yorkshire Housing considers to be unreasonable customer behaviour.
- Provide a clear, fair and consistent approach to identifying and responding to unreasonable customer behaviour.
- Support colleagues to set appropriate boundaries and respond safely to behaviour that is abusive, threatening or places unreasonable demands on services.
- Ensure decisions are proportionate and take account of customers' individual circumstances, support needs and reasonable adjustments, in line with our Accessible Services Policy and Additional Needs Policy.
- Use restrictions on customer contact only where necessary, proportionate, clearly communicated and subject to regular review.
- Maintain accurate records to support consistency, transparency, oversight and any future action.
- Provide customers with a clear and accessible process for requesting a review or appealing a decision made under this policy.

4. Definitions

Unreasonable customer behaviour: Behaviour that causes distress, fear or disruption, places excessive demands on colleagues or services, or prevents the resolution of a complaint or service issue.
Vexatious behaviour: Behaviour intended to provoke or obstruct rather than reach a resolution.
Aggressive or abusive behaviour: Threats, insults, harassment, discriminatory remarks or other behaviour that makes a colleague feel unsafe.
Unreasonable demands: Excessive contact, unrealistic expectations or repeated changes to the issues being raised.
Unreasonable persistence: Refusing to accept decisions or agreed procedures, or continuing to pursue resolved matters without new information.
Contact arrangement: A tailored and formally approved arrangement that sets out how and when a customer may contact Yorkshire Housing, including any restrictions or a single point of contact.

5. Roles and Responsibilities

Colleagues will treat customers with respect and listen to understand their circumstances. Before starting the unreasonable behaviour process, they'll check relevant customer records, including census responses, for needs and communication preferences the customer has shared. They'll consider support and reasonable adjustments, record what they've considered and raise any safety or wellbeing concerns. This check must not delay immediate action to keep people safe.

Managers will support colleagues to respond confidently and consistently. They'll check that decisions are fair, proportionate and based on evidence, and that relevant customer information, support needs and reasonable adjustments have been considered.

Heads of Service will oversee formal decisions made under this policy, including approving tailored contact arrangements and any restrictions that may be required.

YH teams will work together when behaviour affects more than one service, so customers receive clear and consistent support.

6. Legal and Regulatory Context

The following laws and regulatory requirements inform this policy. Which requirements apply depends on the customer's circumstances, the type of tenancy or ownership, and the action we're considering.

- **Equality Act 2010:** requires us to avoid unlawful discrimination and make reasonable adjustments where the duty applies. We will consider how a customer's needs affect communication and behaviour before deciding on, maintaining or reviewing contact restrictions.
- **Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999:** require us to assess and manage risks to colleagues, including work-related violence and aggression, and take reasonably practicable steps to protect their health, safety and welfare.
- **UK General Data Protection Regulation and Data Protection Act 2018, as amended:** govern how we collect, use, share and retain personal information, including incident records, customer needs information and safety alerts. Relevant amendments include those made by the Data (Use and Access) Act 2025 as they come into force.
- **Housing Ombudsman Complaint Handling Code:** statutory since 1 April 2024 under the framework established by the Social Housing (Regulation) Act 2023. Our approach to unacceptable behaviour must preserve access to complaints, take account of individual needs and ensure restrictions are justified, proportionate, recorded and regularly reviewed.
- **Regulator of Social Housing's Transparency, Influence and Accountability Standard:** requires fairness and respect, accessible services and communications, fair and equitable outcomes, and fair, effective and prompt complaint handling. Relevant customer information must inform our understanding of diverse needs, and customers must be able to use representatives or advocates.
- **Protection from Harassment Act 1997 and Anti-social Behaviour, Crime and Policing Act 2014, as amended:** may provide remedies where the relevant legal tests are met. Any enforcement proposal will be considered individually, with legal advice and reference to the legislation and statutory guidance in force at the time.
- **New Homes Quality Code and New Homes Ombudsman Service:** apply to eligible new-build purchases from registered developers. For relevant Space Homes customers, we will identify the applicable Code and redress route; coverage depends on registration, reservation date and scheme rules.

7. Policy Detail

Customers can raise concerns, challenge decisions and make complaints without being treated as unreasonable. We'll look at each issue separately from concerns about behaviour and address service failures through our Customer Feedback Policy.

We'll look at what happened, how often it happened and its impact. We'll consider the customer's circumstances and whether our delays, communication or unresolved issues have contributed. Being distressed, disagreeing with us, contacting us repeatedly or asking for a particular colleague won't, on their own, justify action under this policy.

Before starting the unreasonable behaviour process, we'll check relevant customer records, including the census information we've collected, for additional needs and communication preferences the customer has told us about. We'll consider how these may affect their behaviour or contact with us, and what support or reasonable adjustments could help. Where appropriate, we'll check with the customer that the information is still right and ask whether their needs have changed. We'll record what we've considered and any support or adjustments agreed, in line with our Additional Needs Policy and Accessible Services Policy. If no needs are recorded, we won't assume there are none. This check won't delay immediate action to keep people safe.

Non-Yorkshire Housing customers

If concerns involve someone who isn't a Yorkshire Housing customer, we'll consider informal or formal action based on the circumstances. We'll take account of our relationship with the person, the risks and our legal powers. We can't use tenancy remedies where there's no relevant tenancy relationship.

What we mean by aggressive or abusive behaviour

- Threats, physical violence, shouting, swearing, personal insults, rudeness, or condescending, derogatory or discriminatory remarks.
- Targeted intimidation, personal abuse or deliberately threatening communications. An allegation will not be treated as unreasonable simply because it has not yet been substantiated.
- Stalking, including online targeting, or using or publishing a colleague's personal information to threaten, intimidate or harass them. Recording a conversation will not, by itself, be treated as unreasonable behaviour; any concerns about its use or disclosure will be assessed individually.
- Any form of harassment, including but not limited to harassment on the grounds of age, gender, race, colour, religious belief, physical or mental disability, sexual orientation, culture, ability or lifestyle.
- Conduct that constitutes a hate crime.

What we mean by unreasonable demands

Demands may be unreasonable when they place excessive pressure on colleagues or services. Examples include:

- Demanding responses or actions within an unreasonable timescale.

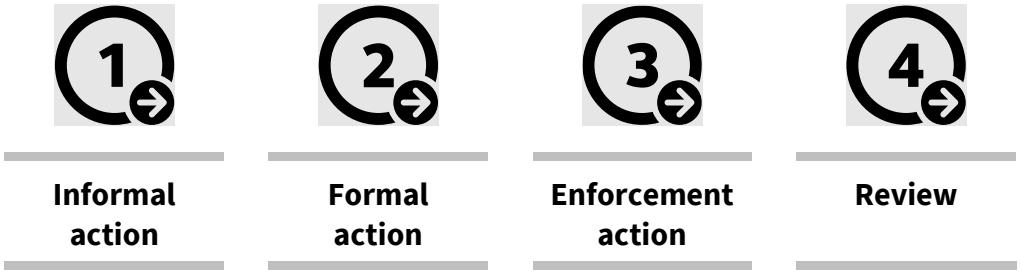
- Insisting on a particular colleague or making repeated contacts across channels where this causes significant disruption and reasonable alternatives have been explained, taking account of agreed adjustments and unresolved service issues.
- Repeatedly changing or expanding issues in a way that significantly obstructs their resolution, after we have explained how new concerns will be handled and offered appropriate support.
- Demands that are disproportionate to the issues raised and materially affect our ability to provide services. Reporting multiple problems or highlighting service failures is not, in itself, unreasonable.

What we mean by unreasonable persistence

Persistence may become unreasonable when it seriously disrupts services or prevents us from resolving an issue. Before taking action, we'll explain our position, consider support needs and make clear how the customer can seek a review or take the matter further. Examples may include:

- Repeatedly refusing to engage with an accessible, clearly explained process, despite appropriate support, in a way that prevents us from progressing the matter. Disagreeing with a decision is not sufficient grounds for restrictions.
- Repeated contact about the same issue that materially disrupts an investigation, despite clear updates and reasonable agreed response times.
- Repeatedly seeking to reopen a fully investigated matter without new relevant information, after the outcome and available review or external redress routes have been explained.
- Sending repeated duplicate requests to multiple colleagues or services that significantly disrupt handling of the same issue. Seeking help from an advocate, elected representative, regulator or Ombudsman will not, by itself, be treated as unreasonable.

Our Approach to Managing Unreasonable Customer Behaviour



Step 1 – Informal action
Where it's safe and appropriate, we'll explain the behaviour causing concern, listen to the customer's point of view and agree a better way to communicate. We'll explain what needs to change, offer support or adjustments and make clear what may happen if the behaviour continues.

Step 2 – Formal action
If informal action doesn't resolve the concerns, or an incident is serious enough to need a formal response, we'll review the evidence and the customer's circumstances. We'll check that relevant census information, additional needs and reasonable adjustments have been considered and recorded before deciding what to do. Action may include a meeting,

further investigation, a written warning or a tailored contact arrangement approved by the relevant Head of Service. Any system alert must describe the risk and agreed response factually and include a review date.

Step 3 – Enforcement action
If behaviour continues or poses a serious risk, we'll consider whether further action is needed and lawful. We'll take legal advice where appropriate. Behaviour covered by this policy isn't automatically anti-social behaviour or a tenancy breach. Any tenancy or legal action must meet the relevant contractual and legal tests. We'll consider the evidence, risks, customer's circumstances and other options. Legal action will be a last resort, but we won't delay immediate action needed to keep people safe.

Step 4 – Review
Every contact restriction will have a review date, which we'll explain to the customer. At each review, we'll consider recent behaviour, current risks, support needs and whether the arrangement is still needed and proportionate. We'll remove or reduce restrictions when they're no longer justified. We'll explain the outcome and reasons in a format the customer can access and understand. Customers can ask for an earlier review if their circumstances change or they have relevant new information.

Immediate action when behaviour is aggressive or abusive
If safety is at risk, colleagues can end a call or meeting, leave the location and contact the police or emergency services where needed. Where it's safe, we'll explain why we're ending contact. We'll record and report incidents through our safety arrangements and support affected colleagues. We can take immediate protective action without completing the earlier steps. Any ongoing restriction must still be formally considered and reviewed.

Restricting customer contact
The relevant Head of Service must approve any ongoing contact restriction. We'll choose the least restrictive arrangement that addresses the concerns supported by evidence. We'll take account of support needs, reasonable adjustments and access to an advocate or representative. Arrangements may set out who the customer contacts, how and at what times. We'll explain the behaviour and evidence considered, our reasons, what the arrangement covers, how long it lasts, its review date and how to appeal. We'll use a format the customer can access and understand. Customers must still have a practical way to report emergencies, access essential housing services, make complaints, exercise their statutory information rights and seek independent redress.

Appeals

Customers can appeal a formal decision by speaking or writing to the colleague managing their case within 20 working days of receiving it. We'll consider reasonable adjustments and any reasons for a late appeal. We'll acknowledge the appeal within five working days, share the appeals process guide and explain what happens next and the expected timescale. A panel that wasn't involved in the original decision will review the evidence, the customer's circumstances and whether the action remains justified and proportionate. The panel may:

- **Uphold the appeal:** remove the action or restrictions because they are not justified or proportionate.

- **Partially uphold the appeal:** change the action or restrictions to address the panel's findings and ensure a proportionate response.
- **Not uphold the appeal:** retain the action or restrictions because they remain justified and proportionate.

We'll explain the appeal outcome and reasons in a format the customer can access and understand. This will include any changes to the arrangements and the review date. Appealing under this policy doesn't replace the right to complain about our service or seek independent redress through the appropriate Ombudsman.

The Housing Ombudsman Complaint Handling Code

We'll apply this policy alongside the statutory Complaint Handling Code and our Customer Feedback Policy. We'll assess the complaint separately from concerns about behaviour. Those concerns won't, on their own, prevent a customer from making or progressing a complaint. We'll explain how to contact the Housing Ombudsman and consider each new complaint on its own merits.

The current requirements are set out in the Housing Ombudsman Complaint Handling Code.

New Homes Ombudsman Service

For eligible Space Homes customers, we will follow the applicable New Homes Quality Code and explain access to the New Homes Ombudsman Service. Eligibility and the relevant Code version depend on the developer's registration, reservation date and scheme rules. Contact arrangements must not prevent customers from using the applicable complaints and independent redress routes. Further information is available from the New Homes Quality Board.

Data Protection

We'll use personal information lawfully, fairly and securely under the UK GDPR and Data Protection Act 2018, as amended. This includes relevant information customers have shared through our census. Records must be factual, relevant, accurate and limited to what we need. Only colleagues who need the information for their role will have access to incident records, additional needs information and safety alerts. We'll review alerts and update or remove them when they're no longer justified. Case records may need to be kept for a different period from a contact restriction. We'll retain them only as necessary, in line with our Retention Schedule and legal requirements.

8. Diversity and Inclusion Implications

We'll consider each customer's needs throughout the process. Disability, mental ill health, communication barriers, trauma or other circumstances may affect how someone expresses themselves or contacts us. We won't make assumptions about a customer or their behaviour. We'll consider support and reasonable adjustments alongside any safety risks before deciding whether action is needed and proportionate.

We'll use relevant census responses and other information customers have shared to understand their needs, in line with our Additional Needs Policy and Accessible Services

Policy. These records help us understand more about our customers' needs, but they do not replace listening to the customer or considering their individual circumstances. We'll support access to an independent advocate or representative where needed and follow our safeguarding arrangements if concerns arise. We'll also check whether this policy creates barriers or unequal outcomes and use what we learn to improve it.

9. Reporting and Monitoring

Heads of Service will check that contact restrictions are approved, supported by evidence and reviewed on time. We'll monitor the number and type of arrangements, reviews, appeals and outcomes, as well as incidents affecting colleague safety. We'll check that relevant census information and other customer records were considered before the process started, and that support needs, reasonable adjustments and reasons for decisions were recorded. Relevant census information will also help us check fair access and outcomes, in line with data protection requirements. We'll use learning from cases, complaints and customer feedback to improve services. The Customer Experience Committee will approve this policy. We'll review it every three years, or sooner if changes in legislation, regulatory requirements or learning make this necessary.

Date approved	18th November 2026
Approved by	Customer Experience Committee
Recommended / scrutinised by	Customers from the Your Voice Matters group and colleagues
Summary of changes	Restructured into the new policy template, with clearer scope, definitions and responsibilities. Strengthened the focus on fair, proportionate decisions, customer needs, census information and reasonable adjustments. Clarified that complaints, challenge and recording conversations are not, in themselves, unreasonable behaviour, and that enforcement requires relevant legal tests to be met. Strengthened safeguards for contact restrictions, reviews and independent appeals, while protecting access to essential services and complaints. Expanded legal and regulatory references, data protection requirements and monitoring arrangements.
Frequency of review	Every three years
Next review date	October 2029
Policy owner	Head of Communities
Policy author	Head of Communities
Associated policies or guidelines	Customer Feedback Policy; Accessible Services Policy; Additional Needs Policy
Associated procedure	YH Unreasonable Behaviour Process and Guide

Version	Date	Change Type	Summary of Change	Approved By
1.0	**Unknown**	**New**	Unreasonable Customer Behaviour Policy introduced.	**Unknown**
2.0	**30 October 2023**	**Substantive**	Policy revised for clarity, with procedural elements moved to the Unreasonable Behaviour Process and Guide.	**Homes and Places Committee**
3.0	**18 November 2026**	**Substantive**	Comprehensive review and restructure, strengthening scope, responsibilities, customer safeguards, reasonable adjustments, restrictions, appeals, legal requirements and monitoring.	**Customer Experience Committee**