SP63 Unacceptable Behaviour Policy

Policy Statement

The Soha Group including Soha Housing, SIB Property and Soha Response believes that everyone has the right to be heard and to be treated with dignity, respect, fairness and honesty. We are committed to building positive relationships with residents and expect everyone involved in those interactions to treat one another with courtesy and respect.

Most of our interactions with residents are positive. However, there are occasions when an individual's behaviour makes it difficult for us to work with them safely or effectively, or when unreasonable demands on our time and resources affect our ability to provide a fair service to other residents.

This policy explains the types of behaviour we consider to be unacceptable, the principles that guide how we will respond, and the actions we may take to protect the wellbeing of our colleagues while continuing to deliver services fairly, consistently and proportionately.

Decisions made under this policy will be proportionate, evidence-based and applied consistently across the organisation, taking account of individual circumstances.

Scope

This policy applies to unacceptable behaviour directed towards Soha Housing colleagues, including employees, contractors and any third-party representatives acting on our behalf.

It applies to anyone interacting with Soha, including (but not limited to):

- housing applicants
- Residents, including tenants, leaseholders, shared owners; and members of their household, guests and visitors to their home
- former residents
- members of the public
- advocates, supporters or representatives acting on behalf of a resident or applicant

- contractors' staff and partner agency representatives
- unknown individuals contacting us or commenting about us online.

This policy applies across all methods of communication, including (but not limited to):

- telephone, voicemail and video calls
- face-to-face contact, including visits to our offices, communal areas and residents' homes
- written communication, including letters, emails, webforms, messaging services, social media and online platforms
- communication through third parties that affects a member of staff
- situations where a person encourages or incites others to harass or intimidate colleagues.

This policy does not apply to concerns relating to the conduct of Soha employees towards one another, which are managed through Soha's employment policies and procedures.

Purpose

This policy explains how Soha will:

- maintain the safety and wellbeing of colleagues;
- manage challenging and unacceptable behaviour fairly, consistently and proportionately;
- set clear expectations about acceptable behaviour;
- record, monitor and respond to incidents appropriately;
- provide appropriate support to colleagues following incidents;
- consider proportionate action where behaviour breaches tenancy conditions or other legal obligations; and
- use incident information to identify trends, improve services and reduce the risk of future incidents.

Our Approach

We recognise that people may sometimes become distressed because of difficult or complex circumstances and may behave out of character when under stress. We will not regard behaviour as unacceptable simply because someone is assertive, persistent or expressing dissatisfaction. We are committed to responding in a fair, supportive and trauma-informed way.

We also recognise that disability, mental health, trauma, neurodiversity and other individual circumstances may affect how a person communicates or engages with our

services. We will consider these factors and any reasonable adjustments in line with the principles set out in this policy.

While we will always seek to understand individual circumstances and make reasonable adjustments where appropriate, we will not tolerate behaviour that is abusive, threatening, discriminatory or violent. No colleague should be expected to accept such behaviour as part of their role. Where unacceptable behaviour occurs, we will respond fairly, consistently and proportionately in accordance with this policy.

Our Commitment to Residents

We expect our staff, contractors and representatives to treat residents with respect, dignity and professionalism at all times.

If you believe a member of staff, contractor or representative has behaved inappropriately or treated you unfairly, we encourage you to tell us. You can raise your concerns through our complaints process by emailing **complaints@soha.co.uk** or calling **0800 015 15 45**. We will investigate your concerns in line with our Complaints Policy and take appropriate action where our standards have not been met.

Definition of Unacceptable Behaviour

For the purposes of this policy, unacceptable behaviour includes:

- abusive or aggressive behaviour;
- unreasonable demands or expectations; and
- unreasonable persistence.

Abusive or Aggressive Behaviour

Behaviour that causes a colleague, contractor or representative acting on Soha's behalf to feel threatened, intimidated, harassed, unsafe or unable to carry out their role. This includes, but is not limited to:

- swearing, abusive language or derogatory remarks;
- personal insults or offensive comments;
- discriminatory behaviour or abuse, including racist, sexist, homophobic, transphobic, ableist or other discriminatory language;
- threats of harm, violence or retaliation, whether explicit or implied;
- intimidation, aggressive shouting or threatening body language;
- stalking, harassment or repeatedly targeting a named colleague;

- making malicious or knowingly false allegations against colleagues, contractors or the organisation;
- publishing or sharing personal information about colleagues online (commonly referred to as "doxxing");
- creating, sharing or using manipulated or AI-generated content to harass, intimidate, threaten or deliberately misrepresent Soha colleagues or the organisation;
- contacting colleagues through their personal social media accounts or other personal communication channels where this is unwanted or inappropriate;
- throwing objects, damaging property or other intimidating actions;
- violence or attempted violence;
- unwanted or inappropriate behaviour towards colleagues, including unwanted physical contact;
- behaviour of a sexual nature, including sexual comments, exposure, sexual harassment, sexual abuse or sexual assault; and
- encouraging or inciting others to engage in any of the behaviours listed above.

This list is not exhaustive and other behaviours may also be considered unacceptable where they have a similar impact on colleagues or others.

Recording Conversations and Interactions

Residents may record conversations or interactions they are involved in, including telephone calls or visits to their home, for their own personal use. While residents are not required to seek Soha's permission before making a recording, we do encourage them to let staff know in advance. This helps promote openness, fairness and transparency.

Recordings may be relied upon as evidence in complaints or other processes, where appropriate. Soha also reserves the right to question the accuracy, completeness or context of any recording where relevant.

Recordings must not be shared publicly, posted on social media, or shared with third parties without appropriate consent.

Residents must not use recordings in a way that is intended to intimidate, harass, distress or unfairly target staff, contractors or representatives. This includes using recordings to undermine an individual's reputation or sharing recordings inappropriately to encourage criticism or abuse. Persistent, aggressive or intrusive filming or photography will be treated as unacceptable behaviour.

On Soha owned property, such as our offices or communal areas, residents are expected to follow any rules or restrictions relating to recording.

Where recording causes staff or contractors to feel unsafe, intimidated or unable to carry out their duties appropriately, we may pause the interaction or visit and agree appropriate arrangements before continuing engagement.

Communication Channels

Residents should contact Soha through our published communication channels. Staff should not be contacted through personal email addresses, personal telephone numbers or personal social media accounts unless this has been expressly agreed by Soha for a specific purpose.

Unreasonable Demands and Expectations

We consider unreasonable demands to be those that substantially impact on our work. This may be because of the nature of, and frequency of contact the resident requests or provides. Examples of this include but are not limited to:

- contact continues despite clear information being provided on next steps
- demands immediate responses outside our service standards
- involves multiple contacts within short timeframes with no new information
- involves contacting multiple teams/staff simultaneously about the same issue
- prevents staff from progressing work or supporting other residents fairly
- refusal to accept a final decision despite clear justification being given
- Voluminous content in communication

Contact is not unreasonable solely because it is frequent; it becomes unreasonable where it is disruptive, disproportionate, or persistent despite clear communication.

Unreasonable Persistence

Where staff have provided a response timeframe, for example “I will update you by Thursday”, residents are expected to allow that timeframe. Repeated chasing contact may be treated as unreasonable unless there is significant new information, circumstances have changed materially or there is an emergency or safety issue.

Acceptable Contact

The following are **not** considered unacceptable behaviour:

- expressing dissatisfaction or frustration at the service received from us
- raising complaints or challenge decisions
- contacting us to chase overdue responses and gain clarity of service delivery
- contacting us urgently for health and safety emergencies

Contact Management Arrangements and Restrictions

Where appropriate, we may implement contact management arrangements to maintain reasonable access to our services while protecting the wellbeing and safety of our colleagues. Any arrangements will be proportionate, evidence-based and tailored to the individual circumstances.

Wherever possible, we will seek to resolve concerns through discussion and support before introducing contact management arrangements. However, where behaviour presents an immediate risk to safety or wellbeing, restrictions may be introduced without prior warning.

Examples of contact management arrangements include:

- appointing a Single Point of Contact
- agreeing a single method of communication (for example, written contact only)
- appointment-only contact
- recording telephone calls, where appropriate and in accordance with relevant legislation and Soha policies
- providing scheduled updates (for example, weekly)
- restricting attendance at our offices without an appointment
- arranging managed home visits (for example, two colleagues attending together)
- withdrawing recognition of a named advocate where that individual has behaved in an unacceptable manner
- setting reasonable limits on the frequency or volume of contact we will respond to within a specified timeframe.

Before applying any contact management arrangements or restrictions, we will consider the individual's circumstances, including any disability, additional needs, communication requirements, reasonable adjustments and any other relevant factors.

Where restrictions are applied, we will confirm them in writing using the most appropriate method of communication, taking account of any agreed communication preferences or reasonable adjustments. We will explain:

- the reasons for the decision;

- the arrangements that will apply;
- how long the arrangements are expected to remain in place;
- when and how the arrangements will be reviewed; and
- how the individual can request a review or appeal the decision.

Service Access and Service Restrictions

We will always seek to ensure residents continue to receive access to essential services. However, where behaviour presents a significant risk to the safety or wellbeing of colleagues, contractors or others, we may temporarily change how or when services are delivered to manage that risk safely.

Emergency and essential safety-related services, including emergency repairs, will continue to be provided wherever reasonably practicable.

Where it is necessary to limit services temporarily (for example, providing emergency repairs only), the decision must be:

- authorised by an appropriate Senior Manager;
- supported by a documented risk assessment;
- proportionate to the level of risk identified; and
- subject to regular review.

Any restrictions will remain in place only for as long as they are considered necessary and proportionate.

Appeals against a decision to restrict contact or services

Residents have the right to appeal any decision made under this policy to restrict contact or services.

Appeals should be submitted within **10 working days** of receiving written notification of the decision and should explain why the resident believes the decision is not justified or that relevant information has not been taken into account.

The appeal will be considered by an appropriate manager who was not involved in making the original decision. The review will consider:

- whether this policy has been applied fairly and consistently;
- whether the decision was proportionate and supported by the available evidence;
- whether any relevant circumstances, including reasonable adjustments or additional needs, have been appropriately considered; and
- whether the restriction remains necessary.

We will normally provide a written response within **10 working days**. Unless there is an immediate reason to amend the arrangements, any restrictions will remain in place while the appeal is being considered.

The outcome of the appeal is final.

Unacceptable Behaviour by Persons Unknown (Including Anonymous Online Activity)

There may be occasions where unacceptable behaviour is carried out by someone whose identity cannot be reasonably established. This may include anonymous emails or letters, fake or anonymous social media accounts, or other online activity where the individual responsible cannot be identified.

Although we may not know who is responsible, we will take reports of unacceptable behaviour seriously and will manage them in line with this policy. Where it is possible to identify the individual at a later stage, we may take any appropriate action available under this policy.

Where unacceptable behaviour occurs through social media or other online platforms (for example, naming or targeting staff on social media, harassment, or publishing personal information), we will:

- record the behaviour as an incident
- preserve evidence where possible (for example screenshots or links)
- carry out a risk assessment and implement appropriate measures to protect staff
- avoid engaging in public arguments or online disputes
- use reporting processes available through the relevant platform to request the removal of content that harasses staff or discloses personal information
- consider reporting the matter to the police, seeking legal advice, or pursuing civil remedies where appropriate.

Where appropriate, and particularly where previous attempts to resolve the issue have been unsuccessful, we may decide not to engage directly through social media or other informal channels and instead ask that all communication takes place through our formal contact routes. We may also block access to our social media accounts where appropriate

Equality, Safeguarding and Additional Needs

We recognise that some people may find it more difficult to communicate or engage with our services because of a disability, mental health condition, neurodiversity, trauma, language barriers, or other individual circumstances.

Before deciding whether behaviour is unacceptable, we will consider any underlying support needs, individual circumstances and whether reasonable adjustments are required to enable fair access to our services

Reasonable adjustments will be considered on an individual basis and may include changes to how we communicate, how we provide services or involving an advocate or support person where appropriate. Details of agreed reasonable adjustments will be recorded, where appropriate, to support consistent service delivery.

Where appropriate, we may also signpost or refer individuals to additional support services, with their consent where required. Where safeguarding concerns arise, staff will follow Soha's Safeguarding Adults at Risk and Children Policy and Procedures alongside this policy.

While we will always seek to understand individual circumstances and make reasonable adjustments where appropriate, this does not mean that threatening, abusive, discriminatory or violent behaviour will be accepted.

Risk Alerts

Where there are concerns about staff or contractor safety due to incidents of unacceptable behaviour, we may apply an alert to a resident’s account within our housing management system. The purpose of the alert is to ensure staff and contractors are aware of potential risks and can take appropriate precautions. This may include:

- completing a risk assessment prior to any visit
- visits carried out in pairs
- appointment-only visits
- contractor briefing on safety controls where necessary
- management oversight of contact/attendance
- a person appropriate to the situation (e.g. male or female only)
- Office only visits
- Use of Body Worn cameras or other appropriate Personal Protective Equipment (PPE)

Risk alerts will only be applied where there is a clear staff safety reason and will:

- be recorded with the reason and supporting incident evidence
- reviewed regularly and removed when no longer required
- handled confidentially and in line with data protection requirements

Applying a risk alert is a safety measure and should not be viewed as a punishment

Tenancy Enforcement Action

Where unacceptable behaviour involves a resident or household member and we believe that it may constitute a breach of tenancy or lease, we will consider appropriate actions, such as:

- warning letters
- acceptable behaviour agreements
- injunctions
- reporting to police where criminal thresholds are met
- possession action (where proportionate and evidence-based)

Roles and Responsibilities

To ensure this policy is implemented effectively and consistently, the following roles and responsibilities apply.

All colleagues and contractors are responsible for:

- treating residents and colleagues with dignity, respect and professionalism;
- maintaining appropriate professional boundaries;
- recognising, reporting and recording incidents of unacceptable behaviour;
- taking appropriate action to protect their own safety and the safety of others; and
- following this policy and the associated procedures.

Managers are responsible for:

- ensuring incidents are managed fairly, consistently and proportionately;
- supporting the wellbeing of colleagues who experience unacceptable behaviour and ensuring appropriate support is offered following an incident;
- ensuring incidents are appropriately recorded, reviewed and escalated where necessary;
- considering and authorising appropriate contact management arrangements or restrictions in accordance with this policy; and
- ensuring decisions and restrictions are reviewed in line with this policy and the accompanying procedures.

Tenancy and Lease Management colleagues are responsible for:

- considering whether behaviour breaches tenancy or leasehold agreements;

- taking proportionate tenancy management or legal action where appropriate;
- managing contact restrictions and legal action where required; and
- working with internal teams and external agencies, including the Police where appropriate, to manage ongoing risks.

Human Resources and Health & Safety are responsible for:

- ensuring appropriate systems are in place for reporting and monitoring incidents;
- supporting colleague wellbeing, workplace safety and risk management;
- monitoring incident data to identify trends and inform organisational learning; and
- promoting a culture where colleagues feel confident to report incidents and seek support.

Review

This policy will be reviewed at least every three years, or sooner where legislation, guidance, organisational learning or incident trends indicate that changes are required.

Legislation

Health and Safety at Work etc. Act 1974
Management of Health and Safety at Work Regulations 1999
Equality Act 2010
Social Housing Regulation Act; Competence & Conduct Standard; Transparency, Influence & Accountability Standard
Protection from Harassment Act 1997
General Data Protection Regulation (GDPR)

Context:

SP01 Equality, Diversity & Inclusion Policy
SS01 Equality, Diversity & Inclusion Strategy
HR11 Hybrid Working Policy
HR17 Competence & Conduct Policy
SA02 Code of Conduct
SP52 Reasonable Adjustments Policy
SP07 Complaints Policy
SP19 Safeguarding Adults at Risk and Children Policy
SP06 Data Protection (UK GDPR) Policy

Version Number - 1			
Members' Forum approved	16 July 2026	SLT approved SLT approved	13 July 2026 11 November 2026

		(minor amendments)	
EIA completed	3 July 2026	Review due date	By July 2029
DPIA Checklist completed	1 October 2026 (full DPIA required)		