

UNREASONABLE CUSTOMER BEHAVIOUR POLICY



Policy Title	Unreasonable Customer Behaviour Policy		
Version	V1	Status	Final
Date	1 August 2025	Author	Feedback and Insight Manager
Next Review Date:	5 August 2028	Approved by	Executive Leadership Team
Responsible Officer:	Head of Customer Services and Engagement	Date Approved	5 August 2525
Associated documents	N/A	EIA Completed by	XXXXX

TABLE OF CONTENTS

Table of Contents _____ 3

1. Purpose of the policy _____ 4

2. Summary _____ 4

3. Background _____ 5

4. Scope _____ 5

5. Some specific examples of unreasonable behaviour and actions _____ 6

6. What actions can be taken to stop or limit the behaviour? _____ 7

7. What happens if a customer continues to contact CHL? _____ 10

8. What can a customer do to challenge CHL’s decision? _____ 11

9. How does CHL review the decision? _____ 11

10. Confidentiality, legal requirements and non-compliance _____ 11

11. For FOI/EIR related cases _____ 11

Diversity & inclusion _____ 13

1. PURPOSE OF THE POLICY

The aim of this policy is to help customers and staff understand how Cornwall Housing Ltd (CHL) manages unreasonable and/or unacceptable behaviour displayed by customers.

It gives clear guidance as to the definition of what we consider to be unreasonable behaviour, explains what actions staff can take when presented with such behaviour and what to do if we receive unreasonable or vexatious communications from customers. We will consider using both this policy and the terms of the Tenancy Agreement to address unreasonable behaviour.

This policy enables CHL to respond proportionately and consistently when such behaviours arise, supporting a fair, respectful, and efficient environment for staff and service users alike and is based on guidance issued by the Housing Ombudsman and the Information Commissioner's Office (ICO).

2. SUMMARY

The vast majority of CHL customers engage respectfully and constructively with our staff and services, however, in a small number of cases individuals may act or communicate in ways that are considered unreasonable or unacceptable. This may include persistent, abusive or disruptive contact that negatively affects staff wellbeing or the organisation's ability to support other customers effectively.

This policy outlines the approach CHL will take when such behaviour occurs. In rare cases where it becomes necessary, CHL may introduce special arrangements to manage contact with individuals whose behaviour presents ongoing challenges. These measures are designed to ensure a safe and respectful environment for staff, protect service capacity, and maintain fairness across our customer base.

It should be noted that regarding requests for information there are differences between Freedom of Information (FOI) and non-FOI related cases, and these are outlined later, although the general principles below apply to both instances.

CHL always aims to deal with any contact, correspondence or complaint in a way which is open, fair, transparent and impartial.

CHL has developed this policy to address instances of unreasonable behaviour that may impact staff wellbeing, resource allocation, and service delivery. It applies across three distinct areas:

- **Unreasonable Behaviour in the context of complaints:** To support staff in managing situations where individuals making complaints begin to act in ways that are considered unreasonable. This includes guidance on



appropriate responses and is aligned with the CHL's Complaints Policy. The aim is to ensure that a small number of individuals do not disproportionately consume staff time at the expense of others.

- **Unreasonable or vexatious contact outside complaints:** To manage non-complaint related interactions that are persistent, excessive, or vexatious, and which take up an unsustainable amount of officer time or organisational capacity.
- **Disrespectful or aggressive behaviour from residents:** To address behaviours that include rude, offensive, aggressive, or otherwise inappropriate tone or language during communication, whether written, verbal or in person.

3. BACKGROUND

CHL understands that people sometimes feel frustrated about matters, but will not tolerate behaviour which is deemed to be unacceptable, threatening, abusive or unreasonably persistent towards staff, or which imposes such a burden on CHL that it is an unreasonable drain on resources.

If CHL considers that a customer's actions are affecting the ability to provide services, or if the actions of a customer are unacceptable, for example, if they become threatening or abusive, then CHL will consider appropriate steps to address this behaviour and consider limiting contact with CHL.

CHL does not normally limit the contact people have with the organisation. Whether residents/customers are making a request for a service, making a complaint, requesting an FOI or seeking help and guidance, CHL is committed to dealing with all requests fairly and impartially and to providing a high quality of service. CHL is keen to resolve any dispute and/or complaint as early as possible, and there are well-established procedures that can be followed to achieve this outlined in the Complaints Policy.

4. SCOPE

CHL defines unreasonable and unacceptable customer behaviour as follows:

- Unreasonable demands received from a customer including:
 - 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 speaking to a different individual or making demands for a new point of contact



- Being unreasonably persistent including:
 - refusing to accept the answer that has been provided
 - continuing to raise the same subject matter without providing any new evidence
 - sending CHL lengthy, complex, or excessive correspondence
 - continuously adding to or changing the subject matter of a complaint or contact
- Being verbally abusive, aggressive and/or, violent including:
 - Making derogatory remarks
 - Being rude
 - Making inflammatory allegations about CHL and its employees
 - Making threats of violence

While CHL strives to engage positively with all customers, there are rare instances where interactions escalate beyond unreasonable or persistent behaviour into conduct that is abusive, offensive, or threatening and CHL have zero tolerance for this behaviour. This includes:

- Verbal abuse, personal insults, or inflammatory language
- Threats directed at staff or other individuals
- Actual harm caused to staff
- Behaviour that causes fear, distress, or a hostile environment

CHL is committed to managing such incidents with consistency and proportionality, ensuring a safe and respectful environment for staff, customers, and stakeholders. The goal of any action taken under this policy is not to pass judgment on individuals, but to protect staff wellbeing, safeguard other users, and uphold the integrity of CHL's services.

Appropriate measures may include restricting contact, involving senior management, or referring the matter to external authorities when necessary, such as the Police. Each decision is made with the intention of resolving the issue fairly while preserving a pleasant and professional service environment.

5. SOME SPECIFIC EXAMPLES OF UNREASONABLE BEHAVIOUR AND ACTIONS

The following is a list of some of the actions and behaviours which may be deemed as unreasonable, unreasonably persistent or unacceptable.

The list is by no means exhaustive and is designed to give an indication of the type of behaviour that is considered to be unreasonably persistent or unacceptable.



Obstruction and Non-Cooperation

- Refusing to clarify disputes, engage with staff, or accept procedural boundaries.
- Rejecting assistance or advice and showing unwillingness to resolve issues.

Manipulative or Dishonest Conduct

- Denying previous statements, submitting falsified documents, or covertly recording meetings without consent.
- Introducing irrelevant or trivial information to derail the process.

Excessive and Unreasonable Demands

- Overloading staff with frequent lengthy communications and expecting immediate responses.
- Making excessive contact or demands that strain resources.

Aggressive or Abusive Behaviour

- Using hostile language, harbouring grudges, or attempting to discredit staff.
- Explicitly aiming to cause disruption or refusing to accept decisions without new evidence.

Persistent and Repetitive Complaints

- Repeating resolved complaints with minor changes or involving others to reopen closed matters.
- Pursuing the same issue across multiple channels simultaneously.

6. WHAT ACTIONS CAN BE TAKEN TO STOP OR LIMIT THE BEHAVIOUR?

The actions CHL takes will depend upon the nature and extent of the behaviours and each case will be dealt with individually. If violence or aggression is demonstrated towards CHL employees or others working on its behalf, then this will be reported to the Police too. Any action taken will be appropriate and proportionate to the nature and frequency of the customer's contact with CHL.

Informal warning

Initially, and depending on the nature of the situation, an email, letter, phone call or meeting will be arranged to explain to the individual that their behaviour is considered to be unreasonable. How contact is made will be at the discretion of the member of CHL staff using appropriate judgement to manage the situation. The staff member liaising with the customer should advise them that their



behaviour is unreasonable or unacceptable in the first instance and provide an opportunity for them to change it.

If the contact or behaviour continues, CHL will follow the process outlined below:

Stage 1 (formal warning)

If the customer ignores the initial advice from the staff member and is deemed to be unreasonably persistent or continues to demonstrate unacceptable behaviour, the relevant Head of Service will write to the individual outlining the following points:

- A further explanation of why the customer's behaviour is deemed unacceptable
- An offer of a phonecall or meeting, if deemed appropriate by CHL, with a member of staff to try and resolve the dispute / complaint / issue and explain to the customer why their behaviour is unacceptable
- The customer may be provided with a named officer/point of contact for any further correspondence
- A statement of future intent to apply restrictive action to the customer's contact should their behaviour continue and the time period this will exist for
- A statement advising that the customer is breaching their tenancy agreement, which could result in legal action being taken if the unreasonable behaviour persists.

In contacting the individual, the Unreasonable Customer Behaviour Policy will be included with the correspondence and the parts of it considered to be relevant will be referenced.

Any arrangements for limiting a customer's contact must take account of the customer's individual circumstances, however, such actions may include denying the customer the ability to email CHL and/or refusing to take telephone calls from the customer, refusing opportunities to be involved with CHL engagement activities and refusing access to CHL buildings.

Should such action be necessary the customer's name will be added to CHL's register as having been sent a formal warning letter.

Stage 2 (full implementation of the policy)

- Full implementation of the policy will be undertaken by the Complex Customer Panel.



- Before the policy can be fully implemented, the Head of Service must be satisfied that the customer is continuing to behave in an unreasonable or persistent manner (as per the policy), and that CHL have responded in accordance with this policy.
- The matter will then be raised at the Complex Customer Panel through a factual report detailing a history of the case and the reasons why the customer's behaviour is felt to be unreasonable/unacceptable. The role of the Complex Customer Panel is to consider if the customer's contact or behaviour with CHL is unreasonable or unacceptable. Please note the Panel will not examine any issues the customer has raised, they will only consider the behaviour exhibited.
- The residents will be offered an opportunity to provide a written submission but cannot attend the panel discussion.
- If the Complex Customer Panel finds the customer's behaviour to be unreasonable or unacceptable, CHL will write to the customer advising them of this, explaining the consequences including any contact restrictions and what the customer can do to have the decision reviewed.
- Should a customer who has been declared unreasonably persistent raise new issues or complaints, these will be reviewed on their own merits and consideration given to any restrictions on the customer which have previously been applied before the new issues are processed.
- The customer will be added to CHL's unreasonable behaviour register, also ensuring relevant officers are made aware and a note will be added to the relevant customer account to advise staff of the arrangements in place.

If a customer's behaviour is deemed severely disruptive or abusive or escalates significantly over a short period, a Head of Service can immediately escalate the issue to Stage 2 of the process. Where this has been the case, this will be explained to the customer in the letter informing them of the Complex Customer Panel referral.

Responding to Abusive and/or Threatening Behaviour

If a customer's behaviour becomes abusive, threatening, or otherwise poses a risk to the safety and wellbeing of staff or others, CHL reserves



the right to take appropriate action. This may include reporting the incident to the police or initiating proceedings for breach of the tenancy agreement, where applicable. Such measures will be considered when behaviour escalates beyond acceptable boundaries and efforts to resolve the situation through dialogue have been unsuccessful.

7. WHAT HAPPENS IF A CUSTOMER CONTINUES TO CONTACT CHL?

The service concerned should appoint a named officer to review any future correspondence or contact from the customer, considering whether this relates to an existing issue or whether it is a new concern.

Where a customer continues to contact us about an existing issue, to which this policy has been applied, but provides no further new evidence to support their contact, no further action should be taken on the issue.

If a customer raises a new issue or provides further new evidence to support their existing issue, the relevant Head of Service will make a decision as to how this will be dealt with and whether any existing restrictions (as per this policy) are still appropriate or whether breach of tenancy agreement action is necessary.

Customers must not attempt to bypass this policy by involving others to act on their behalf—such as family members, close associates, advocates, or representatives of groups or bodies—to submit identical or substantially similar issues. If CHL determines that an individual is acting in place of, or in coordination with, someone listed on the Unreasonable Behaviour Register, the person submitting the duplicate issue will also be subject to this policy.

CHL remains open to constructive third-party support, including advocacy and mediation, where it is aimed at resolving issues collaboratively and respectfully. We welcome engagement with recognised advocates or mediators who can help facilitate positive dialogue and outcomes.

If a customer seeks to circumvent the policy by contacting their local MP or Councillor, CHL will engage with the elected representative. However, we will request their support in maintaining the customer's current status under this policy, while assisting with any investigations they choose to undertake.

Any customers on the unreasonable behaviour register will not be allowed to attend CHL events or CHL Board meetings and should such a



circumstance occur they will be politely asked to leave.

8. WHAT CAN A CUSTOMER DO TO CHALLENGE CHL'S DECISION?

If a customer is unhappy with the decision CHL has taken under this policy or is unhappy with how they have been treated, they can appeal the decision of the Complex Customer Panel by using the contact details included in the letter received advising them of the decision.

The decision will be reviewed by the Senior Leadership Team at their next available meeting and a final decision letter will be issued to the customer following that meeting.

If the customer remains unhappy, they can make a complaint to the Housing Ombudsman about how they have been treated or they are free to seek their own independent legal advice.

9. HOW DOES CHL REVIEW THE DECISION?

Where restrictions (in line with this policy) have been applied to a customer, they will normally be in place for a year but will be subject to review after 6 months by the Complex Customer Panel with the customer being advised of this by email (or by phone or letter if an email address is not available).

At the end of the restriction period, the Complex Customer Panel will review the case and write to the customer to advise them of the outcome. Where any restrictions are to continue, the customer will be notified of this alongside an explanation of why and when the next review is scheduled to take place.

10. CONFIDENTIALITY, LEGAL REQUIREMENTS AND NON-COMPLIANCE

- All personal data provided to CHL will be processed in accordance with GDPR and the Data Protection Act 2018;
- Any breach of the policy may result in CHL being referred to the Regulator for Social Housing or Housing Ombudsman.

11. FOR FOI/EIR RELATED CASES

CHL does not have to deal with requests that are considered vexatious under s14(1) of the Freedom of Information Act (FOIA) or manifestly unreasonable under regulation 12(4)(b) of the Environmental Information Regulations (EIRs).

However, s14(1) can only be applied to the request and not the requestor, and there needs to be careful consideration given as to whether the request is vexatious before it is classed as such.



Section 14(1) is designed to protect public authorities by allowing them to refuse any requests which have the potential to cause a disproportionate or unjustified level of disruption, irritation or distress. Court cases have recognised the need to protect CHL resources from unreasonable requests. The Information Commissioner (ICO) sets out the following as indicators as to whether a request is vexatious or not;

- Abusive or aggressive language is used;
- The requests are placing an undue burden on the authority;
- The requests are part of a personal grudge;
- The requests are unreasonably persistent;
- The requestor is intransigent;
- There are frequent or overlapping requests on the same issue;
- The requests are designed to cause annoyance;
- The requests require a disproportionate effort to fill; and
- The requestor is using the information request route to pursue other complaints or grievances against CHL.

Further advice on what exemptions under FOI, or exceptions under EIR may be applied as appropriate, can be found in the CHL Freedom of Information Act Policy.

MONITORING AND REVIEW

This policy will be reviewed on a 3 yearly basis or more frequently in response to changes in legislation, regulatory guidance, good practice or changes in other relevant CHL policy.

Performance in relation to the delivery of the services and activities set out in this policy will be monitored on an ongoing basis through the established reporting mechanisms to CHL's Senior Management Team and Executive Leadership Team.



DIVERSITY & INCLUSION

CHL is committed to treating all people with fairness and respect. CHL aims to create an inclusive environment where people are treated with dignity, inequalities are challenged, and CHL anticipates and responds positively to different needs and circumstances to enable individuals to achieve their potential and foster good relations within the communities CHL serves. CHL wants to be recognised as an organisation delivering fair, inclusive, accessible services and an employer and partner of choice.

When applying this policy, CHL acts sensitively towards the diverse needs of individuals and to reduce discrimination and harassment by making reasonable adjustments such as:

- eliminating discrimination – by providing support to those who need it and information in accessible formats and languages on request.
- tailoring the policy to meet both the specific needs of the individual, including those with additional support needs, and the diverse needs of the wider community.
- advancing equality of opportunity – treating all tenants fairly.
- fostering good relationships – listening to customers and responding appropriately.
- compliant with all aspects of Equality & Diversity legislation, and specifically the Equality Act 2010.



Contact us:

Email: info@cornwallhousing.org.uk

Telephone: **0300 1234 161**

By letter: **Cornwall Housing, Chy Trevail, Beacon Technology Park, Bodmin, PL31 2FR**

Alternative formats:

If you would like this information on audio CD, audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact info@cornwallhousing.org.uk

