

Customer Conduct Management Policy

1. Introduction

- 1.1 This policy outlines A2Dominion's approach to managing customer conduct, particularly in situations where the actions of customers and household members become unacceptable and/or pose a risk to the safety of staff, contractors, and other stakeholders. It provides guidelines for dealing with unacceptable behaviour while making sure any actions taken are fair and in line with relevant legislation and regulatory standards.
- 1.2 This policy applies to all staff, contractors (via a flag through their portal), and third-party stakeholders interacting with our customers or complainants, ensuring safety while maintaining respect for privacy and confidentiality. Contractors and third parties will also carry out their own risk assessments.
- 1.3 The policy complies with the Housing Ombudsman Scheme (HOS) Complaint Handling Code, and has due regard to HOS Spotlight on Attitudes, Respect and Rights, ensuring customer service, customer choice, and that complaints are managed to the highest standards. It adheres to the Health and Safety at Work Act 1974, protecting staff from harm, and the Data Protection Act 2018, safeguarding personal data and privacy. The policy also respects individual rights as outlined in the Human Rights Act 1998 and ensures everyone is treated fairly, in line with the Equality Act 2010.



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2. Policy aims and objectives

- 2.1 To protect the health and safety of our staff, contractors, and residents by identifying and addressing aggressive, abusive, or threatening behaviour.
- 2.2 To define acceptable and unacceptable behaviours and ensure that customers understand the expected standards of conduct.
- 2.3 To implement a clear and consistent process for managing and addressing unacceptable behaviours whilst ensuring fairness and accessibility.
- 2.4 To make reasonable adjustments for people with disabilities and vulnerabilities, making sure that restrictions do not unfairly prevent them from accessing services.
- 2.5 To establish a review and appeal process for customers subject to conduct restrictions.

3. Customer conduct

3.1 Reasonable adjustments and vulnerability considerations

- 3.1.1 We recognise that some customers may have disabilities or impairments that affect their ability to engage with our services. Where applicable, reasonable adjustments will be made to ensure fair access to services.
- 3.1.2 However, where a customer's behaviour becomes unacceptable or unreasonable, we may need to review or modify an existing adjustment.
- 3.1.3 Each situation will be looked at individually, and other ways of communicating will be considered before any restrictions are put in place.

3.2 Unacceptable behaviour

- 3.2.1 Behaviours that cause staff, contractors, or other customers to feel threatened, abused, or unsafe will not be tolerated. Examples include but are not limited to:
 - Aggressive or threatening behaviour, including physical violence
 - Verbal abuse, such as shouting, swearing, or derogatory remarks
 - Written abuse, including offensive language or false accusations
 - Harassment or intimidation of staff, contractors, customers, and stakeholders
 - Publicly sharing or publishing staff information, including on social media

- Recording and distributing telephone conversations without consent
- Contacting staff on personal social media accounts.

3.3 Unreasonable demands and levels of contact

3.3.1 Unreasonable demands and excessive contact make it harder for us to provide fair service. Examples include:

- Repeatedly demanding responses within unrealistic timeframes
- Demanding to speak to specific staff members without a valid reason
- Repeatedly changing the subject of a complaint or raising unrelated concerns
- Continuing to contact staff after a matter has been resolved
- Sending excessive emails, letters, or telephone calls repeating the same points.

3.3.2 If a customer's behaviour falls into these categories, we will first communicate our concerns and give them an opportunity to adjust their behaviour before imposing any restrictions.

3.4 Actions we may take to manage unreasonable customer behaviour

3.4.1 Behaviours that cause staff, contractors, or other customers to feel threatened, abused, or unsafe will not be tolerated. If a customer's behaviour remains unacceptable, we may impose restrictions and take further actions, such as:

- Limiting communication to written correspondence only
- Choosing one staff member as the sole point of contact
- Temporarily pausing communication with the customer
- Deciding not to investigate a complaint pursued in an unacceptable manner
- In extreme cases, reporting threats to law enforcement or relevant authorities
- Injunctive relief to prevent repeats of the behaviour and to protect staff, other customers and members of the public
- Restrictions on how home visits are carried out (i.e. in pairs, no lone female, etc.)

3.4.2 The actions we decide to take will be proportionate to the assessment that we make and may include actions not listed above.

3.4.3 If a restriction is put in place, the customer will be notified in writing, explaining why it's happening and how long it will last (usually 12 months).

3.4.4 Where we take actions to manage unreasonable customer behaviour, a note will be placed on the customer's record. This will be visible to all staff.

3.5 External reporting

3.5.1 If the behaviour puts staff safety at risk or breaks the law, we may report the incidents to outside agencies such as:

- The police (e.g. threats of violence, harassment, or criminal activity)
- The customer's landlord or local authority where necessary
- Social media platforms if inappropriate content is published.

3.5.2 If we can, we will let the customer know if their behaviour has been reported to an outside authority, unless it would interfere with an investigation.

4. Appeals and reviews process

4.1 Customers can request a review of any conduct restriction in the following circumstances:

- A significant change in their circumstances that makes the restriction unsuitable
- Evidence that the restriction limits their ability to access essential services
- A factual error in the decision-making process.

4.2 A Head of Service will review the case, and the customer will receive a written response within **14 working days**. This will be our final decision on the matter.

4.3 Restrictions will be reviewed annually and may be modified or lifted if behaviour improves. We will communicate the outcome of these reviews with the customer, and any rights of review that they may have.

5. Monitoring and review

5.1 Warnings and restrictions will be logged in our case management system and reviewed regularly.

5.2 Managers are responsible for ensuring that staff consistently adhere to this policy by providing clear guidance, regular training and ongoing support. Managers will monitor case records, review cautionary and customer conduct alerts and assess responses.

- 5.3 Regular team meetings and one to one discussions should be used to reinforce expectations and address any challenges staff may have.
- 5.4 This policy will be reviewed every three years or sooner if required by legislative or regulatory changes.

6. Equality, Diversity & Inclusion Statement

- 6.1 A2Dominion Group, colleagues, partners, stakeholders, and contractors are committed to providing services that are relevant and appropriate to the needs of all people. We will treat others fairly and without discrimination.
- 6.2 We will ensure that all services relating to this policy are accessible and inclusive, in compliance with the requirements of the Equality Act 2010. This includes providing information in alternative formats where needed, such as translations, large print, or other accessible formats. If required, please contact translate@a2dominion.co.uk.
- 6.3 An equality impact assessment (EIA) form has been completed for this policy.

7. Data Protection Statement

- 7.1 The protection of personal data is of great importance to A2Dominion Group and more than just a legal obligation.
- 7.2 A2Dominion Group and affiliate organisations are the data controllers registered with the ICO with the following registration numbers:
- A2Dominion Housing Group Limited: Z4843307
 - A2Dominion Homes Limited: Z9799978
 - A2Dominion South Limited: Z7835340
 - A2Dominion Housing Options Limited: Z5412073
 - A2Dominion Residential Limited: Z3391351
 - A2Dominion Developments Limited: ZA103931
 - Pyramid Plus London LLP: Z3594227
 - Pyramid Plus South LLP: Z3594230
- 7.3 Our data protection policy and procedures are governed by the Data Protection Act 2018. We collect and process personal information in order to provide housing services and meet our contractual and legal obligations. All persons authorised to receive personal data are obliged to

handle personal data in accordance with applicable laws and regulations at all times.

- 7.4 For information on how we collect, store, process and use customers' personal data, please visit our website on:
a2dominiongroup.co.uk/privacy-and-cookie-policy.
- 7.5 For employee related privacy statement, please contact our People Services team at people.support@a2dominion.co.uk.
- 7.6 You can also contact the Data Protection Officer / Data Compliance team at governance@a2dominion.co.uk.