



LIMITED CONTACT POLICY

2024-2026

Limited Contact Policy

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Contact Officer:	Corporate Head of Customers
Policy Version:	Version 1 December 2020 Version 2 December 2022 Version 3 December 2024
Version Reviewed by:	CLT 21 November 2024
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Policy Links:	Equality and Diversity Policy Complaints Policy Reasonable Adjustment Policy Code of Conduct for colleagues, Board Members and Involved Customers Anti-social Behaviour Policy Performance Management and Assurance Framework

Brief Policy Summary:

This Policy has been designed to support our approach to effectively managing and learning from our complaints process and all customer contact channels where customer behaviours become a concern to colleagues while accessing LHP services.

Occasionally, the behavior or actions of individuals accessing services or using the Complaints process makes it very challenging for LHP colleagues to deal with. In a small number of cases the actions of individuals become unacceptable because they involve abuse of our colleagues or our process.

When this happens, we will take action to protect the health and wellbeing of our colleagues. We will also consider the impact of the behaviour on our ability to do our work and provide services to others. We will also consider the best recourse based on customer needs or vulnerability.

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Purpose

1. To provide a framework to support colleagues to decide whether the Limited Contact Policy should be applied and when applied, delivered fairly and consistently and to inform customers of where and when it may be applied.

Objectives

2. This policy is intended to provide a clear and straight forward explanation of the Limited Contact Policy to support colleagues to invoke this policy where all other avenues have been exhausted and therefore there is no other alternative.
3. How to access LHP services and the complaints process are comprehensively advertised, however in some instances where a customer behaves inappropriately, uses foul language and generally abuses their position as a valued customer, LHP will invoke the Limited Contact Policy.
4. This policy will only be used with the permission and comprehensive review of rationale to invoke by the Executive Director of Customers.

Scope

5. LHP recognises that in a minority of complaint cases, customers can pursue their complaints in a way which can impede the investigation of their complaint, distract from the main concern and on occasion can abuse colleagues endeavouring to address their complaint.
6. LHP does not tolerate unacceptable and abusive behaviour by customers or any other customer contacting the business through any contact channel.
7. LHP will take appropriate action to protect colleagues from this type of behaviour and ensure that a complaint is addressed within the advertised time scales by invoking this policy whilst continuing to address a complaint through the measured approach identified within the two stages of the Complaints Policy.
8. Colleagues will be encouraged to report incidents of unacceptable behaviour to their line manager. If required, this will be escalated to the customer experience manager and the corporate head of customers and when required for final approval the Executive Director of Customers for consideration of action through the limited contact policy.
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11. Colleagues affected by threatening, aggressive or abusive behaviour will have the support of their line manager to ensure they are safe to continue in their duties. A risk assessment will be completed where necessary, with a potential flag marker being added to the customer's account to inform the rest of the business.

Actions that LHP considers unacceptable

12. LHP recognises that people may act out of character in times of trouble or distress. There may have been upsetting or distressing circumstances leading up to a customer using the complaints service.
13. We consider actions that result in unreasonable demands on our service or unreasonable behaviour towards LHP's colleagues to be unacceptable. It is these actions that we aim to manage under this Policy.

Criteria	Behaviour
Unacceptable and abusive behaviour	Using abusive or foul language on the telephone, face to face or by any written or digital channel
	Threatening to or the use of violence
	Consistently sending multiple emails demanding feedback
	Consistently leaving multiple voice mails demanding feedback
Unacceptable Language which is:	Insulting or degrading, is offensive, derogatory or patronising
	Is racist
	Sexist, homophobic or transphobic;
	Makes serious allegations that individuals have committed criminal, corrupt, or perverse conduct without any evidence
Unreasonable demands	Repeatedly demanding response within an unreasonable timescale
	Insisting on seeing or speaking to/or avoiding a specific colleague when that is not possible
	Repeatedly changing the substance of a complaint or raising unrelated concerns

	Refusing to accept a decision where explanations for the decision have been provided
	Disadvantages other customers and prevents their own complaint from being dealt with quickly.
Unreasonable levels of contact	Volume and duration of contact made to our services through email, post or telephone
	Continuous contact while we are in the process of considering a matter
	Unnecessarily or excessively copying us into emails to other parties
	Inundates LHP with copies of information that has been sent already or that is irrelevant to the complaint.
	When time spent talking to a customer on the telephone, or responding to, reviewing and filing emails or written correspondence impacts on our ability to deal with that complaint, or with other customers' complaints.
Unreasonable refusal to cooperate	Not agreeing the substance of a complaint which we will be investigating and understanding the expected outcomes
	The provision of further information, evidence or comments on request
	Help us by summarising your concerns.
Unreasonable use of the complaint policy	The effect of the repeated complaints is to harass, or to prevent LHP from pursuing a legitimate aim or implementing a legitimate decision.
Harassment	Recording telephone discussions and publishing information online through social media channels
	Contacting staff using their personal details or social media presence such as Facebook, Twitter or LinkedIn
	Publishing personal, sensitive or private information about staff online or other public domains such as noticeboards and newsletters

14. We understand that many customers may be angry about the issues they have raised in their complaint or while accessing any service's If that anger escalates into aggression towards LHP colleagues, we consider that unacceptable. Any violence or abuse towards colleagues will not be accepted.
15. Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether verbal or written) that may cause colleagues to feel offended, afraid, threatened or abused.16.
16. A demand becomes unacceptable when it starts to (or when complying with the demand would) impact substantially on the work of the complaints service.

17. We consider it is unreasonable to bring a complaint to us and then not respond to reasonable requests to support our investigation.
18. Individuals with complaints about LHP's service have a right to pursue their concerns through a range of different routes. They also have the right to complain more than once about the services they receive from LHP if subsequent incidents occur.
19. We consider access to a complaints service very important, and it will only be in exceptional circumstances that we would consider such repeated use is unacceptable – but we reserve the right to do so in such cases.

Reasonable adjustments

20. LHP understands that some of our customers have mental health, physical or learning disabilities which may make it difficult for them to express themselves or communicate clearly, especially when they are anxious or upset.
21. We also recognise that some disabilities can make it difficult for customers to understand the impact that their behaviour might have on other people.
22. We will always consider making reasonable adjustments for a disabled customer if we are asked to do so or hold the information that informs us that an individual has a condition or a requirement for greater support for example:
 - We would use different methods of communication to meet customer needs such as liaising with a next of kin, family friend or support worker.
 - Agree with the customer to give clear warnings when we feel that a customer's behaviour is unacceptable so that they can change it.
 - We would not consider it to be reasonable to expect our colleagues to accept being subjected to aggressive, offensive, or abusive actions, language, or behaviour.
23. We may still use the policy if there are actions or behaviours which are having a negative effect on our colleagues or our work.
24. LHP also recognise that there may be occasions where it is difficult to distinguish whether a customer's behaviour is persistent or is a case of Anti-Social Behaviour (ASB). If unsure we will address concerns through our ASB Policy and use the sanctions within the Tenancy Agreement.

Imposing Restrictions

25. LHP will ensure that any complaint has or is being investigated thoroughly following the Complaints Policy.
26. A warning letter will be sent to the customer about their behaviour requesting that they modify their behaviour in future contact with LHP.
27. If the disruptive behaviour continues, the Corporate Head of Customers in consultation with the Executive Director of Customers will issue a second letter to the customer advising them that the way in which you contact us in the future will be restricted. This decision and the restrictions will be advised, along with the period that any restrictions will apply to the customer in writing by the Executive Director of Customers.
28. The letter will explain:
 - Why we have taken this decision
 - What precisely is the action that we are taking
 - The duration of the restriction
 - The review process of this policy and a copy of the policy
 - The customers right to contact the Housing Ombudsman regarding having the limited contact policy applied to them.
29. Restrictions will be reviewed quarterly from the date of the second letter and the customer updated regarding the outcome of the review.
30. Restrictions will be appropriate and proportionate and tailored to address individual circumstances. This may include but is not limited to:
 - Disallowing the customer from making contact by telephone and / or email except through an agreed third party and requiring that they only make contact by letter.
 - Access to our offices may be stopped
 - Restricting contact to named colleagues only
 - Restricting telephone calls to specific days, times and duration
 - Personal contact to take place with appropriate witnesses' present
 - Advising the customer that we will no longer acknowledge or reply to further contact from them on specific topics of a complaint in which case a designated colleague will be identified who will read future correspondence and advice outcomes accordingly.

31. Should the restrictions applied to the customer not be adhered to and challenging behaviour continue, the Executive Director of Customers may decide to refuse all contact with the customer and may even stop the investigation into their complaint.
32. Where the behaviour is so extreme, or it threatens the safety and welfare of LHP's colleagues we will consider taking further action including contacting the police or taking legal action.

New Complaints

33. New complaints from customers who have had this policy applied to them will be treated on their merit by the Executive Director of Customers to ensure that genuine service requests and complaints are not being ignored.

Delivery and monitoring

34. Comprehensive records will be retained by the Customer Experience Manager which will include details of the imposed restrictions and their start and end dates.
35. The Board will be provided within an annual complaints review, of the number of times this policy has been used along with the rationales for implementing the policy.

Review cycle

36. This policy will be reviewed biannually in line with the Complaint Policy.

Equality Impact Assessment

Limited Contact Policy

Provide a summary of the aims and main activities of the initiative (bullet points):

When customers are complaining about LHP or its services, sometimes their behaviour or actions creating challenging situations

These actions include abusive or threatening behaviour towards colleagues or other customers and/or high levels of contact through any of our communication channels.

This can be disruptive to colleagues in their duties to investigate and resolve the issue or complaint and our ability to do our work and provide services to others.

This policy states what LHP categorises as these types of behaviour, how it will be address and the considerations we will make to resolve and support the customer where necessary.

Completed By:	Customer Experience Manager	Date:	November 2024
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STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e. have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e. will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

It is expected that this policy is equality neutral ensuring that it is applied fairly when looking at individuals’ needs and vulnerabilities and taken on a case-by-case basis.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality ‘neutral’? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

No, this policy is considered equality neutral as there are clear guidelines on when the approach needs to be one of support and multi-agency where customers have vulnerabilities or needs such as mental illness or learning disabilities. The approaches will be decided on a case-by-case basis.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or overrepresented? Do they have access to the same resources? What are your sources of data and are there any gaps? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

The policy has been designed to provide a framework for the delivery of a fair and consistent response to complaints and designed to manage those instances when contact with LHP should be limited. The policy guides on how customer needs and vulnerabilities should be considered ahead of any action to ensure it is fair and proportionate

We collect data on all customers in relation to gender, age, disability, race/ethnicity, religion/faith and sexuality. We will analyse this data when looking to implement this policy to ensure approaches are being decided on a case-by-case basis.

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Whilst there are no outsourced services named, it is understood that where a multi-agency approach is required to suit a customer's vulnerability or need, LHP will work in partnership with support services, health teams, social workers or any other agencies, as well as family advocates to find a resolution that will work for the individual.

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

This policy has not been enacted since its last review. Due to this low volume, it is not deemed that a full EIA would be required. However, if numbers increase over the next two-year period, this will be monitored and we will revisit this decision.

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data. Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

We will revisit this impact assessment in 6 months once we have reviewed monitoring data and incidents of it being enacted to identify if any actions are required.