



## MANAGING PERSISTENT OR UNREASONABLE CUSTOMER CONTACT POLICY

<b>Lead Manager:</b>	Complaints Manager
<b>Responsible Senior Manager:</b>	Head of Corporate Services
<b>Approved By:</b>	EMT and CSS
<b>Date Approved:</b>	28 <sup>th</sup> December 2025
<b>Date for Review:</b>	December 2028
<b>Replaces Previous Version:</b>	2, 22.01.19
<b>Version Number:</b>	3
<b>Linked Policies:</b>	Complaint Handling Policy, Data Protection Policy, Lone Working Policy, Talent Management Policy
<b>Linked Procedures:</b>	Complaints Procedure

# CONTENTS

1. PURPOSE.....	3
2. SCOPE AND PRINCIPLES.....	3
3. DEFINITIONS .....	3
4. RESPONSIBILITIES .....	4
5. UNREASONABLE OR EXCESSIVE DEMANDS.....	4
6. AGGRESSIVE OR ABUSIVE BEHAVIOUR .....	4
7. HARASSMENT.....	4
8. REFUSAL TO CO-OPERATE.....	4
9. REASONABLE ADJUSTMENTS.....	5
10. CONSIDERING THE CUSTOMER'S BEHAVIOUR .....	5
11. MANAGING CONTACT/IMPOSING RESTRICTIONS .....	5
12. URGENT OR EXTREME CASES .....	6
13. OPERATING THE POLICY (RECORDING AND ALERTS) .....	6
14. APPEALS .....	6
15. REVIEW OF RESTRICTIONS.....	6
16. RECORD KEEPING.....	6
17. EQUALITY, DIVERSITY AND INCLUSION .....	6
18. PRIVACY AND PERSONAL DATA .....	6
19. REVIEW .....	7
20. VERSION CONTROL.....	7

## 1. PURPOSE

- 1.1 Dealing with a complaint and other customer contact should be a straightforward process, but in a minority of cases, people pursue their complaints or enquiries in a way that could be regarded as unreasonably persistent and/or vexatious in their contact and or submission of information. This can either impede the investigation of their complaint or can have significant resource issues for Shropshire Towns and Rural Housing (STAR). The unreasonable behaviour may occur whilst the complaint is still being investigated, or after the complaint has been concluded or it can arise as part of a customer's day to day interaction with STAR.
- 1.2 STAR is committed to delivering solution-focused services and learning from complaints to continuously improve. We aim to speak directly with customers to understand concerns and, ordinarily, we do not limit the form or amount of contact.
- 1.3 On occasion, the frequency, nature, or tone of contact can place unreasonable demands on staff time and resources, disadvantage other customers, or impede investigations.
- 1.4 This policy sets out a fair, respectful, and proportionate approach to managing persistent, unreasonable, or vexatious contact across all channels—telephone, face-to-face, letters, email, social media, and other digital platforms.
- 1.5 We recognise there may be mitigating circumstances behind persistent contact. We will take an empathetic and supportive approach and consider reasonable adjustments where appropriate.
- 1.6 Where behaviour escalates into abuse, aggression, harassment, or discrimination, STAR Housing will take steps to protect staff and services, up to and including legal action.

## 2. SCOPE AND PRINCIPLES

- 2.1 This policy applies to all customer contact, including service requests and formal complaints, whether during an investigation or after an outcome is communicated.
- 2.2 Decisions under this policy will be:
  - Individualised (case-by-case).
  - Evidence-based and proportionate.
  - Transparent, with reasons explained in writing.
  - Reviewed regularly to ensure restrictions remain necessary and fair.

## 3. DEFINITIONS

- 3.1 **Unreasonable or Excessive Demands:** Contact or conduct that significantly impacts service delivery or disadvantages other customers.
- 3.2 **Unreasonably Persistent or Vexatious Behaviour:** Contacts which, by their nature or frequency, hinder consideration of the complainant's or others' issues.
- 3.3 **Aggressive or Abusive Behaviour:** Verbal, written, or physical actions that cause staff to feel threatened, offended, or abused, including discriminatory language.
- 3.4 **Harassment:** Behaviour that targets staff personally or seeks to intimidate, including posting recordings or personal data online, or repeated unwanted contact via personal channels.

#### **4. RESPONSIBILITIES**

- 4.1 All employees must record incidents and escalate concerns in line with this policy.
- 4.2 The Head of Service/Senior Manager reviews proposed restrictions and ensures they are justified and proportionate.
- 4.3 The Managing Director (or delegated SMT member) authorises significant restrictions and signs formal notification letters.
- 4.4 The Customer Experience Manager maintains oversight of alerts and compliance, including breach reporting and review timetables.

#### **5. UNREASONABLE OR EXCESSIVE DEMANDS**

- 5.1 All employees must record incidents and escalate concerns in line with this policy.
- 5.2 The Head of Service/Senior Manager reviews proposed restrictions and ensures they are justified and proportionate.
- 5.3 The Managing Director (or delegated SMT member) authorises significant restrictions and signs formal notification letters.
- 5.4 The Customer Experience Manager maintains oversight of alerts and compliance, including breach reporting and review timetables.

#### **6. AGGRESSIVE OR ABUSIVE BEHAVIOUR**

- 6.1 While distress is understood, aggression towards staff is unacceptable. Violence, abuse, or threats will not be tolerated.
- 6.2 Examples include shouting, swearing, threatening language; offensive/derogatory remarks; discriminatory language; inflammatory statements; unsubstantiated allegations of criminality or corruption.
- 6.3 STAR may end calls/meetings, notify the police, and/or pursue legal action where warranted.

#### **7. HARASSMENT**

- 7.1 Staff have the right to work free from harassment. Customers must respect that officers act on STAR's behalf.
- 7.2 Examples include recording and publishing calls/meetings online; contacting staff via personal social media or personal numbers; publishing personal or sensitive information; intimidation or offensive behaviour.

#### **8. REFUSAL TO CO-OPERATE**

- 8.1 To progress enquiries/complaints, STAR may request: issue details, evidence, information and a summary of concerns.
- 8.2 Persistent refusal to co-operate impedes resolution. We will support customers with genuine difficulties, including adjustments to communication.

## **9. REASONABLE ADJUSTMENTS**

- 9.1 STAR will consider adjustments such as home visits, large print, translation, advocates, and agreed contact times.
- 9.2 We may provide clear warnings if conversations become unproductive, giving opportunity to modify behaviour.
- 9.3 Where behaviour remains unreasonable, STAR may:
  - Limit contact to one channel (e.g., email).
  - Appoint a Single Point of Contact (SPOC).
  - Restrict frequency (e.g., one update per week/month).
  - Confirm a complaint is fully addressed and outline next steps.
  - Inform the customer that repeated calls will be terminated.
  - Adopt zero-tolerance measures for abuse.
  - Consider legal action where STAR may need to withdraw its services or end a tenancy.

## **10. CONSIDERING THE CUSTOMER'S BEHAVIOUR**

- 10.1 Before invoking restrictions, a Senior Manager will confirm:

- The issue has been properly and fairly investigated under STAR's Complaint Handling Policy and the outcome communicated in writing.
- No new, material information has been provided that would alter the response.
- Any relevant mitigating circumstances and reasonable adjustments have been considered.

## **11. MANAGING CONTACT/IMPOSING RESTRICTIONS**

- 11.1 Initial Warning: Unless behaviour is extreme, STAR will issue a written warning, explaining why the behaviour is considered unreasonable and the potential consequences if it persists.
- 11.2 Offer of Meeting: Where feasible, a meeting with a Senior Manager may be offered to explain concerns, discuss adjustments, and enable advocacy/support if appropriate.
- 11.3 Restrictions (if behaviour persists): The Managing Director (or delegated SMT member) will write to the customer detailing: the specific behaviours deemed unreasonable; restrictions (e.g., SPOC; channel limits; frequency caps; time-limited access during an ongoing investigation); duration and review date; and how future contact will be handled (e.g., correspondence read and filed but not acknowledged unless new material information is provided).
- 11.4 Where relevant, partners (e.g., Shropshire Council contact centres) may be informed so restrictions are applied consistently.
- 11.5 Closed complaints: If a complaint is concluded, STAR may specify that further contact on the same matter will be filed without acknowledgement, unless new, material information is provided.

## **12. URGENT OR EXTREME CASES**

- 12.1 Staff safety is paramount. Zero-tolerance procedures apply. Incidents are recorded on Housing One, and alerts may be recorded.
- 12.2 STAR may involve the Police or pursue legal action for harassment, assault, criminal damage, or similar. A system alert may be added where risk is identified.
- 12.3 Abusive or threatening language/behaviour will result in immediate termination of calls or in-person contact.

## **13. OPERATING THE POLICY (RECORDING AND ALERTS)**

- 13.1 Decisions must be recorded with grounds for applying the policy, restrictions imposed, scope, and detail and review date (typically six months, may be shorter/longer where justified, quarterly review in extended cases).
- 13.2 Records will include customer name and address, restriction start/end dates, details of restrictions and dates notified.
- 13.3 Employees must notify the Customer Experience Manager of any contact that breaches restrictions, ensuring prompt action and accurate records on Housing One.

## **14. APPEALS**

- 14.1 Customers may appeal restrictions. Appeals are reviewed by a member of the Senior Management Team not previously involved.
- 14.2 Outcomes will be confirmed in writing with reasons and any adjustments to restrictions.

## **15. REVIEW OF RESTRICTIONS**

- 15.1 The status of a customer with restrictions will be reviewed after six months and every three months thereafter while in force.
- 15.2 Customers will be informed in writing if restrictions are extended, varied or ceased.
- 15.3 An annual report will be issued to STAR Board via the Customer Services subcommittee on the number of households with restrictions applied.

## **16. RECORD KEEPING**

- 16.1 The status of a customer with restrictions will be reviewed after six months and every three months thereafter while in force.

## **17. EQUALITY, DIVERSITY AND INCLUSION**

- 17.1 STAR will apply this policy in line with our EDI commitments, ensuring decisions are non-discriminatory and that reasonable adjustments are considered where appropriate.

## **18. PRIVACY AND PERSONAL DATA**

- 18.1 STAR handles personal data in accordance with the Data Protection Act 2018 and UK GDPR. Information collected under this policy will be lawful, necessary, and

proportionate, and stored securely with access limited to those who need it.

## **19. REVIEW**

19.1 This policy will be reviewed every three years or because of a change in legislation to ensure it is relevant with legal and regulatory requirements and best practice.

## **20. VERSION CONTROL**

Renewal Date	Version	Approved By	Comments
12 2025	3	CSS	Updated policy title and operational processes
01 2019	2	TBC	-