



Waltham Forest Housing Association

Complaints Policy – Unacceptable behaviour

Who does this policy apply to:	This policy applies to all tenants, staff and board members.
Review Date (minimum every three years)	This policy will be due for review in March 2028
Policy Author/Reviewer and Job Title	Michael Pughsley – Director of Housing

POLICY

Purpose and Scope of the Policy:

WFHA is committed to investigating and responding to all complaints fairly, honestly, consistently, and appropriately. Everyone has the right to be heard, understood and respected.

WFHA works within the framework of the law and a robust Equality Diversity and Inclusion Policy. We understand that people who are disadvantaged as a result of a particular characteristic may find making themselves understood or heard can be frustrating. We will do our very best to ensure they are heard and understood and not disadvantaged in the way we deal with their complaint.

Our staff accept that people under stress or who are feeling angry or upset may react in an abusive or aggressive way to the person with whom they are dealing.

Our staff are trained to make reasonable allowances for such behaviour and to understand that it does not, of itself, mean that a complaint is unjustified.

However, there are a minority of cases where a person complains in a way that prevents WFHA staff from investigating the complaint; takes up a disproportionate level of resources; or behaves in a way that is unacceptable. Examples include:

- unreasonable demands (e.g. requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another)
- unreasonable persistence (refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to or changing the subject matter of the complaint)
- verbal abuse, aggression, violence (this is not just limited to actual physical or verbal abuse but can include derogatory remarks, rudeness, inflammatory allegations and threats of violence)
- overload of letters, calls, emails or contact via social media (this could include the frequency of contact as well as the volume of correspondence received as well as the frequency and length of telephone calls).

WFHA does not believe that raising legitimate queries or criticisms of our services or officers should lead to a complaint being regarded as unacceptable behaviour or a someone making a complaint as unreasonably

persistent.

Attempts will be made informally first to establish what the person making the complaint would like to achieve as a reasonable outcome to their complaint.

We aim to establish a working environment for our staff where their exposure to unnecessary stress due to the unacceptable behaviour of others is managed but that genuine concerns made in a complaint are properly addressed. This may include allegations made against members of staff.

However, we do not expect our staff to tolerate unacceptable behaviour by a person who makes a complaint or any customer and will take action to protect them from this. This may include

- providing a single point of contact.
- engaging third party or multi-agency support.
- involving the Ombudsman for advice.
- changing the staff member's responsibilities temporarily.
- limiting contact to a single form ie to writing, email or telephone only.
- limiting contact to certain times or to a limited number of times per week or month.
- declining to give any further consideration to an issue unless any additional evidence or information is provided.
- only considering a certain number of issues in a specific period.
- Raise a safeguarding alert to Adult Social Care where there are concerns for a tenant's welfare and mental health

In extreme cases such as physical violence or harassment towards an employee, WFHA will report this to the police, take legal action including for possession of a tenant's home and end direct contact with the person making the complaint.

A review period will be agreed with the person making the complaint so that any restrictions can be amended or lifted as matters improve.

Related Policies:

Complaints

Equality

Safeguarding

Whistleblowing

Grievance

Procedure:

Although unreasonable or persistent, the person making the complaint may have justified complaints which they are pursuing in inappropriate ways, therefore, we must be satisfied that:

- Their complaint is being or has been investigated in line with our procedure.
- The decision reached at the end of this was the right one.
- All communication with them has been adequate and reasonable.
- They are not providing any significant new information that may affect WFHA's decision.

If the above conditions have been satisfied, the decision must be taken by the Chief Executive as to whether to treat this complainant as exhibiting unreasonable behaviour for the purposes of the policy.

If unacceptable behaviour is established, the following steps must be taken:

- In the first instance, a letter must be sent explaining why their behaviour is causing concern and what actions we may take in line with the policy.
- If the behaviour continues, a decision will be taken by the Chief Executive as to the action to be taken and a letter sent to the complainant to inform them. These actions may include:
 - providing a single point of contact;
 - engaging third party or multi-agency support;
 - involving the Ombudsman for advice;
 - changing the staff member's responsibilities temporarily;
 - limiting contact to a single form i.e. to writing, email or telephone only;
 - limiting contact to certain times or to a limited number of times per week or month;
 - declining to give any further consideration to an issue unless any additional evidence or information is provided;
 - only considering a certain number of issues in a specific period;
 - Raise a safeguarding alert to Adult Social Care where there are concerns for a tenant's welfare and mental health.

Any restrictions imposed on a person making a complaint must be reviewed every 3 months or as agreed with the person making the complaint and a decision taken by the Chief Executive as to whether to amend or lift the restrictions. All decisions must be communicated to the person making the complaint in writing.

Document History:

Date of Last Review: April 2025

Equality Impact Statement:

WFHA must ensure all individuals are treated fairly and in line with legislation relating to the nine protected characteristics identified in the Equality Act 2010 and with the Association's Equality policies and procedures. You must comply with the law and Association policies and procedures governing equality and diversity. The nine protected characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.