



Unreasonably Persistent Contact Policy

1. Introduction

The purpose of this Policy is to define and help manage any contacts from our customers which is considered to be unreasonably persistent. For this Policy a customer is defined as a Citizen tenant, licensee, leaseholder or freeholder and any member of their family or someone acting on their behalf.

Citizen offers services which are open and accessible to our customers, and we aim to deliver these to the highest standard. When we fall short, we expect our customers to have the right to be heard, understood, and be confident that they can raise their concerns with us.

We recognise that people may act out of character in times of trouble or distress and there may have been upsetting or distressing circumstances leading up to a customer contacting Citizen. We also accept that our customers have the right to challenge and complain about service delivery if it has not met their expectations.

However, we do consider actions that result in unreasonable demands being made to us, or an unreasonable number of contacts being made with staff or other agents acting on our behalf, to be unacceptable.

We will manage this via this Policy and the procedures which support its delivery. These have been framed within the context of appropriate legislation including the Equality Act 2010 and The Human Rights Act 1998, as well as the various tenancy, license and lease agreements which clearly set out our, and our customers responsibilities.

2. Scope

This Policy defines customers who are considered subject to the unreasonably persistent contact procedure. These include customers who:

- make unreasonable demands
- are unreasonably persistent
- refuse to accept the outcome of a complaint or review process and continue to pursue their complaint or issue in a persistent, vexatious, or unreasonable manner

This Policy is not restricted to unreasonably persistent contact concerning complaints but applies to any occasion when a customer contacts Citizen.

UNREASONABLY PERSISTENT CONTACT POLICY



This Policy does not apply when customer behaviour falls within the Health and Safety Policy definition of 'violent or aggressive' or is subject to our anti-social behaviour policy. It does apply where the behaviour or actions of customers using our service is impacting our ability to do our work and/or provide a service to others.

The Policy goes beyond considering unreasonably persistent contact towards Citizen staff but also that towards Board members, consultants, contractors, and any agents working on behalf of or with the Organisation.

3. Policy detail

What we consider as unreasonably persistent contact

3.1 Unreasonable demands

Customers may make what are considered as unreasonable demands on the amount of information they seek, the nature and scale of service that they expect, or the number of approaches that they make with regards to a single issue. What amounts to unreasonable demands will always depend on the individual circumstances and the nature of the issues raised by the customer.

However, customers that take a disproportionate amount of resources may be subject to consequences of the unreasonably persistent contact procedure.

Examples of unreasonable demands are

- Insisting on seeing or speaking to a particular member of staff and nobody else
- Refusal to speak to, or deal with staff members for an unjustified reason
- Contacting several staff or external partners about the same issue persistently
- Not giving staff the opportunity or time to resolve the issue when clear timescales have been provided in accordance with our procedures
- Disproportionate number of contacts by phone, emails, letters, or visits to offices
- Repeatedly changing the substance of the enquiry
- Requesting responses within an unreasonable timescale

These demands are considered as unreasonable, especially if they impact substantially on the work of any staff member or contractor working on our behalf, leading to other customers being disadvantaged, due to the excessive amount of time taken in dealing with these situations.

3.2 Customers who are unreasonably persistent

Some customers will not, accept that we are unable to assist them further or provide a level of service other than that provided already. Customers may persist in disagreeing with the

UNREASONABLY PERSISTENT CONTACT POLICY



action or decision taken and contact us persistently about the same issue. Even when we are acting in accordance with policy and the decision is unpalatable to the customer, the level of contact is disproportionate to the issue.

Examples of unreasonable persistence are

- Refusal to accept a decision made
- Refusal to accept explanations relating to what can or can't be done
- Refusal to take ownership or responsibility that would assist Citizen to solve the issue – for example, refusal to complete diary sheets
- Continuing to pursue an issue without presenting any new information

3.3 Unreasonable use of the complaints and review processes

Customers with complaints about a service delivered by a staff member or contractor acting on our behalf or a decision made by us has the right to pursue their concerns through our complaints policy. They also have the right to complain more than once if subsequent incidents occur.

If this contact becomes unreasonable, when the effect of the repeated complaints is to harass, or to prevent an organisation from pursuing a legitimate aim or implementing a legitimate decision this is unacceptable. We consider access to a complaints system to be important and it will only be in exceptional circumstances that we would consider such repeated use as unreasonably persistent – but we reserve the right to do so in such cases.

3.4 Raising awareness of unreasonably persistent contact

- A copy of this Policy is available on request
- Where relevant staff will make customers aware of this Policy and our procedures that support it and the possible impacts on them should their behaviour be judged to be unreasonable
- Citizen will ensure that contractors and individuals working with or on behalf of the association are aware of this Policy

3.5 Managing unreasonably persistent contact

How we choose to manage unreasonable behaviour is dependent upon the nature and extent of an individual's actions. Initially staff will contact customers in writing to explain any actions we consider as unreasonable, requesting them to change their behaviour and explaining the consequences of not doing so.

UNREASONABLY PERSISTENT CONTACT POLICY



If the unreasonable behaviour persists following the warnings set out in our procedures and it significantly affects our ability to work and provide service to others, we may need to act and restrict customer access for example,

- arranging for a specific number of staff or person to deal with any correspondence or calls
- requiring the customer to make appointments to see a named staff member before visiting the office
- requiring customers to communicate in writing only (unless reporting an emergency repair or enquiry)
- requiring contact to be via a third party
- requiring customers to only contact us once in a month unless reporting an emergency

If any restrictions are applied customers will be informed of them and their duration in writing. With exception of incidents that require immediate action, decisions to restrict contact will only be taken in line with our procedures.

Should restrictions to contact be applied, this will be applied ensuring that customers continue receiving services from us and maintain at least one form of contact with us except in extreme situations where contact will be through a third party.

We may offer to meet the customer to discuss their behaviour to reach agreement on a way forward, and if necessary, to enable resolution will engage with external experts, such as independent mediators.

If we consider an issue has been fully responded to and that the continuation of correspondence serves no purpose, the customer will be advised that future correspondences on the matter will be filed but not responded to unless there is a significant update that requires action.

We will regularly review the status any customers with restricted contact arrangements in line with our procedures and reconsider decisions, easing or lifting restrictions if customers demonstrate changed behaviour. We may consider a secondary review of the decision to invoke the Policy.

4. Roles, responsibility, and Governance

It is the responsibility of the Board to seek assurance that this Policy is successfully implemented. The Senior Leadership Team and Heads of Service are responsible for

UNREASONABLY PERSISTENT CONTACT POLICY



ensuring the effective implementation of this Policy and that all staff understand the importance of this Policy, the related procedures and that they comply with them. Managers are responsible for ensuring that their team have undertaken the appropriate Policy eLearning and training,

Any changes to this Policy must be made in line with the requirements set out in Citizens Standing Orders and our Policy framework.

5. **Monitoring and review**

This Policy will be reviewed every three years, unless legislation, service delivery or regulatory developments require otherwise, ensuring the policy continues to meet its objectives and take account of good practice developments.

Legal advice will be taken to ensure compliance with legal, regulatory, and contractual responsibilities.

Where appropriate service delivery reports in respect of this Policy will be incorporated into our quarterly reporting suite.

6. **Equality Impact Assessment**

This policy has been subject to an Equality Analysis. Colleagues working across Citizen have considered the impact of this Policy on different groups and communities that we work with. In framing this policy, our staff are committed to not discriminate adversely against any group and will respect the diversity of the communities we are working within.

7. **Version control**

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	REVIEW
V 1.0	Feb 2022	New policy	Citizen Board – Feb 2022 Customer Assurance Committee Jan 2022	Feb 2025

UNREASONABLY PERSISTENT CONTACT POLICY

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