

**Wolverhampton Homes  
Persistent Customer  
Contact Policy  
2026 - 2028**



## Monitoring and Review

| Document owner                                    | Approved by                   | Authorised by                              | Effective date | Review date |
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| Customer Experience Manager – Customer Resolution | Director – Corporate Services | Communities and Service Delivery Committee | April 2026     | May 2028    |

## Document History

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## **1.0 Purpose**

- 1.1 Wolverhampton Homes is committed to providing solution focused services for all customers, including learning from complaints and using customer feedback to improve our services. When responding to enquiries or concerns, we will always try to speak to the customer directly to ensure we understand the basis of their complaint / dissatisfaction. Where the frequency or nature of customer contact is persistent or unreasonable, this can place increased demands on staff time and resources.
- 1.2 This policy aims to address these issues in a fair and respectful way and to consider each situation on an individual basis. It details our approach to understanding and managing persistent or unreasonable contact including those made by telephone, face-to-face, letters, e-mails, social media, and other digital channels.
- 1.3 We understand that there may be mitigating circumstances that may cause a customer to contact us in an unreasonable or persistent manner, and we will always take an empathetic and supporting approach to try to understand the reason for the behaviour and to offer support or signposting.
- 1.4 Where there are instances of behaviour or actions where those using our services, make it difficult for us to deal with their enquiry or complaint, e.g. abusive or aggressive behaviour towards staff or our processes we will take steps to work with the individual to provide a managed approach.

## **2.0 Persistent or unreasonable excessive demands on services**

- 2.1 A demand becomes unacceptable when there is clear evidence that it is starting to (or when complying with the demand would) impact substantially on the work of our services.
- 2.2 Examples of this include:
  - repeatedly demanding a response within an unreasonable timescale, outside of our usual service standards.
  - insisting on seeing or speaking to a particular member of staff when that is not possible.
  - repeatedly changing the substance of an enquiry or complaint or raising unrelated concerns.
  - continuous contact while we are in the process of considering a matter in line with our expected processes.
  - telephone calls over a short period / lengthy telephone calls repeating the same points of discussion.
  - high volumes of information provided via any contact method referencing the same issues.
  - unnecessarily or excessive contact e.g. copying WH into contact with other parties.
  - repeated complaints about the same or similar issues.

2.3 This can impact on service delivery where the demand of an individual can take up an excessive amount of staff time and in doing so disadvantages our other customers and prevents enquiries or complaints from being dealt with quickly.

### **3.0 Aggressive or abusive behaviour**

3.1 Whilst we understand that customers can feel upset and frustrated in relation to issues raised, Wolverhampton Homes will not tolerate aggression, violence or abuse of any kind towards our officers or those representing or working on behalf of the company e.g. volunteers, contractors etc. This includes behaviour or language (whether verbal or written) that may cause staff to feel offended due to the language used, afraid, threatened or abused.

3.2 Examples of this include unacceptable behaviour of language that is:

- offensive, threatening, derogatory, or patronising.
- is discriminatory in any way, including racist, sexist, homophobic or transphobic comments.
- makes serious allegations that individuals have committed criminal, corrupt, or perverse conduct without any evidence.
- any comments which may be regarded as a hate crime.
- comments aimed third parties due to the effect listening or reading may have on our staff e.g. rudeness, making inflammatory statements, or raising unsubstantiated allegations made towards these third parties.

We will judge each situation individually, and where necessitated, criminal or legal action will be taken.

### **4.0 Harassment**

4.1 Staff have the right to carry out their duties free from harassment or threats of harassment. We ask all customers to respect that staff are delivering services and communication decisions on behalf of Wolverhampton Homes and therefore this may not reflect their own views or preferences.

4.2 Examples of behaviours we consider to be harassment against our staff include:

- recording telephone discussions / videoing or publishing information on online platforms e.g. YouTube, Facebook etc.
- contacting staff using their personal details e.g. via social media.
- publishing personal, sensitive, or private information about staff online or other public domains e.g. social media.

### **5.0 Co-operation with reasonable requests**

5.1 When we are looking at a service request or complaint, we will request information such as:

- the details of the enquiry or complaint.
- further information, evidence, or comments on a request.
- a summary of the concerns raised.

5.2 Where a customer repeatedly refuses to co-operate, this makes it difficult for us to respond. We will always seek to support a customer where we have evidence of specific needs that make it difficult to comply with a request.

## **6.0 Reasonable adjustments in the delivery of our services**

6.1 We understand that there may be individual difficulty for customers to express themselves or communicate clearly, especially when they are anxious or upset. To help, we ask that customers try to explain what adjustments are needed from us to support with accessing our services or what would be needed for a complaint to be made more easily.

6.2 We will speak to the customer to understand any support needs and consider making reasonable adjustments if we are asked to do so. Examples of adjustments we can consider are:

- using different methods of communication e.g. face to face / sign language / interpreter.
- providing written communication in large print, coloured text, or in translation.
- consider additional support requirements.
- providing clear and polite warnings if conversations become unproductive, prior to ending a call or meeting.
- proactive support to ensure any identified needs are met in the delivery of our services.

6.3 The following tailored approaches to the delivery of services may be suitable, taking individual circumstances into account:

- advising the customer that repeated calls regarding a complaint currently being investigated are not acceptable and may be terminated unless the customer has a new concern to raise.
- where a complaint has been responded to as fully as possible in line with our policy, we will outline the next steps that can be taken.
- providing specific or limited contact arrangements e.g. email or letter only, scheduled telephone calls, time limited where necessary. We will always consider the customers' ability to use these methods and how to report urgent matters.
- appointing a single point of contact (SPOC) – where this is implemented, with a written explanation for this decision with a confirmed review period. This contact will be conducted at times to be agreed with the customer and will help to ensure that our communication with and support to the customer is maintained, and access to our services is maintained. This will not impact on the customers' ability to report any urgent matters to us.

- Schedule periodic property inspections to manage excessive or repeat reports of repairs. Where face to face contact is requested, we will aim to facilitate this, and this may take place in the presence of a witness and in a suitable location. Is there a role for our Communications and Engagement team here to more closely manage communication and re-build relationships where engagement is challenging?
- allowing contact via a third party such as an advocate.
- informing the complainant that future correspondence will be read and placed on file but not acknowledged where this relates to complaints about the same matter unless this demonstrates new evidence, worsening conditions, or linked issues.
- adopting a 'zero tolerance' policy – this could include a standard communication, for example, “Wolverhampton Homes operates a zero-tolerance policy, and the safety and respect of its staff is paramount at all times.”

6.4 Any SPOC arrangement will be reviewed by a Senior Manager (Head of Service or above). When this is the case, we will write to the complainant to explain:

- why the decision has been taken
- what action has been taken
- the duration of that action
- a copy of this policy will be included

6.5 Relevant staff will be informed of the arrangement in place, where appropriate, to ensure a consistent and co-ordinated approach across the company. An alert will be placed on our Housing Management system so that colleagues understand that there are interim contact arrangements in place.

## **7.0 Urgent or extreme cases**

7.1 In the event of an urgent or extreme case, safeguarding of staff is paramount. Zero tolerance policies and procedures are in place, and any incident of this nature is recorded on our management systems in relation to the individual / property.

7.2 Where there is evidence that the complainant has committed a criminal offence, such as harassment, assault on staff or criminal damage, the Police will be notified in line with our staff risk management and health and safety procedures. A potentially violent person (PVP) system alert may be recorded – to note these alerts are regularly reviewed.

## **8.0 Operating the policy**

8.1 Initial contact with the customer will be made to discuss their behaviour to help to understand the reasons for it. This policy will be referred to, and the customer will be asked to reflect on their behaviour. Any customer support needs will be considered.

Prior to implementing arrangements within the policy, the relevant Head of Service will review the supporting evidence of continued persistent or unreasonable contacts reviewed.

The customer resolution team will write to the customer to confirm that the policy has been applied, the terms, scope and detail, the customers right to review, and the review period.

8.2 Relevant details must be recorded on the system and must be supported by the following information:

- grounds for applying the policy
- Understanding of any customer support needs and the reason for the behaviour
- any restrictions to be applied, including scope and detail
- review date – typically every three months

8.3 Records will be kept of the name and address of each complainant who is treated as abusive, unreasonable, or persistent, or any other person who so aids the complainant:

- when the restrictions came into force and end
- what the restrictions are
- when the person and the council were advised

8.4 Employees should notify the Customer Experience Manager of any contact in breach of the restrictions used so that further steps can be taken to manage future contact. This should also be recorded on the system.

## **9.0 Appeal of decision by complainant or their representative**

9.1 A complainant will be informed of their right to appeal against restrictions and or changes to contact when this policy is applied, and this will be considered independently by a member of the Senior Management Team not previously involved in the original decision to apply this policy.

9.2 Written confirmation will be provided to the customer with the outcome of the appeal which will be undertaken within 28 days of receipt.

## **10.0 Reviewing decisions to implement the policy**

10.1 Regular reviews of evidence will be undertaken by the Customer Resolution Team and the Head of Service to consider if the arrangements in place should be continued.

10.2 Written confirmation will be provided to the customer to either extend or cease the arrangement based on the evidence presented.

## **11.0 Policy review**

11.1 This policy is subject to review and has been endorsed by the Customer Involvement Panel to ensure this meets the needs and expectations of our customers. Feedback from the Customer Involvement Panel has been considered as part of the review.

## **12.0 Privacy and personal data**

12.1 Customer privacy is important to us, and we are therefore committed to handling personal data in accordance with the provisions of the Data Protection Act 2018, General Data Protection Regulation 2016/679, and any subsequent changes to data protection legislation.

12.2 Our privacy policy can be found on our website:  
<https://www.wolverhamptonhomes.org.uk/privacy>