

Managed Behaviour Policy

This policy sets out Bromford Flagship LiveWest's approach to [managing unacceptable behaviour, in support of delivering safe, fair and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Customer Experience
Policy owner	Regional Director - Customer Director of Service Delivery
Approved date	December 2025
Date for review	March 2028
Approving body	Customer SLT
Associated legislation/regulation	Anti-social Behaviour Acts 2003, 2014 Care Act 2014 Crime and Disorder Act 1998 Equality Act 2010 GDPR and Data Protection Act 2018 Health and Safety at Work Act 1974 Housing Acts 1985, 1988, 1996 Human Rights Act 1998 Protection from Harassment Act 1997 Regulator of Social Housing Consumer Standards 2024 Worker Protection Act (Amendment of Equality Act 2010) 2023
Legal advice from	Internal Legal Team
Equality impact assessment date	October 2025
Version number	1.1
Publication status	Internal Intranet and Customer Website

Purpose/principles

This policy sets out Bromford Flagship's approach to preventing and managing unacceptable behaviour directed at colleagues, contractors, and those working on our behalf. It ensures that our teams are protected while fostering respectful relationships with our customers.

We recognise that unacceptable behaviour may stem from distress, trauma, or unmet needs. Our approach is rooted in the principles of:

- dignity and respect
- fairness and inclusion
- person-centred practice
- safety and proportionality
- accountability and transparency

This policy supports our compliance with the Neighbourhood and Community Standard, the Worker Protection Act 2023, and guidance from the Housing Ombudsman.

Scope

This policy applies to:

- customers (tenants, leaseholders, shared owners) of Bromford, Flagship, Newtide Homes, Samphire Homes, Victory Homes and Flagship Homes
- their household members, visitors, and support workers
- applicants and former customers

It applies across all contact methods, including:

- in-person visits
- phone calls
- letters, emails, and online forms
- social media, text messages, WhatsApp, and other messaging apps

Colleague behaviour is governed separately by our internal Code of Conduct and People Policies.

Roles/responsibilities

Board/Committees provide oversight and assurance that the policy aligns with strategic priorities, customer outcomes, and regulatory requirements.

Executive Leadership Team/Directors are accountable for ensuring the policy is implemented consistently across their areas of responsibility and that compliance is maintained.

Heads of Service/Service Leads are responsible for embedding the policy within their service areas, ensuring colleagues are aware of and follow the requirements, and providing assurance on compliance.

Customer-facing colleagues are responsible for applying the policy in day-to-day service delivery, supporting customers, and taking action or escalating issues in line with procedures.

All colleagues are expected to understand the policy as it relates to their role, complete any required training, and seek support where clarification is needed.

Policy content

Our approach

We aim to build trusting, respectful relationships with all customers. The majority of interactions are positive, this policy is not punitive but designed to protect all parties and ensure everyone can access services in a safe and fair way. Our approach emphasises how we communicate, interact, and provide access to services in a way that is clear, respectful, and inclusive.

Reasonable adjustments

We understand that some behaviours may be linked to:

- disability, mental health, neurodivergent conditions
- trauma, bereavement, or personal crisis
- communication barriers (e.g. language, literacy)

Where this applies, we will consider a range of reasonable adjustments to ensure fairness and accessibility. These may include (but are not limited to):

- allowing more time to respond or providing information in alternative formats
- liaising with trusted third parties, support workers, or advocates
- providing telephone interpreters, translation services, or communication aids
- signposting to relevant support services
- making other adjustments appropriate to the individual circumstances

Behaviour we consider unacceptable

We define unacceptable behaviour as actions that:

- cause colleagues or contractors to feel afraid, threatened, or harassed
- make unreasonable demands on our time or services
- obstruct service delivery or communication

Category	Examples include, but are not limited to:
Aggressive/ abusive	Threats, violence, shouting, discriminatory language or behaviour (e.g. racist, sexist, homophobic, transphobic, anti-religious, or ableist), personal insults

Unreasonable demands	Constant calls/emails, demanding same-day responses, insisting on specific staff without reason, persistently raising the same issue despite already having received a response
Harassment	Following or contacting staff outside of work, posting staff details online, unwanted sexual comments, seeking staff out on social media
Failure to cooperate	Repeatedly missing appointments, obstructing access, ignoring key communications, making repeated false reports about neighbours, vexatious or repeat complaints about minor inconveniences

Note: Reasonable follow-up contact about unresolved issues or ongoing complaints will not be treated as unacceptable behaviour. Customers have the right to pursue fair resolution through our Complaints Policy or other relevant processes

What we'll do

We'll always try to de-escalate first, offering support and flexibility. If behaviour continues, we may:

- provide clear feedback on behaviour and request change
- set boundaries
- restrict communication channels (e.g. written only)
- restrict access to offices or home visits
- take legal or tenancy enforcement action if necessary

Except in serious circumstances, where safety or wellbeing is at risk, we may act sooner.

Restricting access (as a last resort)

Our intention is always to maintain open communication and access to services. We will only consider restricting access where behaviour presents a clear and ongoing risk. We will try to avoid restrictions wherever possible, but where unavoidable, restrictions will be proportionate, reviewed regularly, and communicated clearly to the customer.

Legal and Human Rights considerations

Any restriction on access or communication will be applied proportionately and for the shortest necessary period, in line with Article 8 of the Human Rights Act 1998 (respect for private and family life).

We will record the rationale for restrictions, the risks being managed, and the date for review.

Restrictions will never be used punitively or without due regard to disability, vulnerability, or equality considerations.

Decisions will also take account of the Protection from Harassment Act 1997 and Worker Protection Act 2023, ensuring a fair balance between protecting colleagues and maintaining customer access.

Appeals and complaints

You can appeal any access restriction within 14 days of notification.

Appeals will be reviewed by an independent senior leader not previously involved, who will assess:

- whether the restriction is proportionate and justified
- whether all reasonable adjustments and de-escalation options were considered
- whether the process aligns with the Housing Ombudsman's Dispute Resolution Principles (fairness, accountability, learning)

A written outcome will be provided within 14 days.

If you remain dissatisfied, you may escalate to the Housing Ombudsman.

Complaints about the ongoing management of restrictions will follow our Complaints Policy.

Confidentiality and data use

We comply with data protection law and Housing Ombudsman guidance. We will explain how we use personal or medical data and direct you to our Privacy Notice and Special Category Data Policy.

Our Commitments

We will:

- treat you with dignity and respect
- explain decisions clearly and listen to your views
- offer support or flexibility if you're experiencing distress
- explore alternatives before we take formal steps
- make it easy to raise a concern or appeal a decision

EIA statement

An Equality Impact Assessment (EIA) has been completed for this policy. The EIA ensures that the policy is fair, inclusive, and does not negatively impact any protected groups under the Equality Act 2010. The outcomes of the assessment will be monitored, and actions taken where needed to promote equity.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

Training statement

All colleagues will receive training tailored to their role, so they can respond with empathy, consistency, and confidence.

Measuring effectiveness

We will track:

- volume and type of access restrictions
- feedback from affected customers
- incident trends and escalations
- internal audits of restriction processes
- insights from complaints and ombudsman cases

Review period

This policy will be formally reviewed every three years. Earlier review may take place if required by changes in legislation, regulation, organisational priorities, or following feedback from colleagues, customers, or stakeholders. Any updates will be approved through the appropriate governance route.

Approval

This policy was approved by Customer SLT and is applicable to:

- Bromford Housing Association Ltd (operating as Bromford)
- Bromford Home Ownership Ltd (operating as Bromford)
- Merlin Housing Society Ltd (operating as Bromford)
- Flagship Housing Limited (operating as Flagship)

Any references to Bromford Flagship LiveWest should be interpreted as equally applicable to all the above.

Supporting documents

- ASB Procedure
- ASB Service Standard
- Complaints Policy
- Domestic Abuse Policy
- Equality Impact Assessment (2025)
- Managed Behaviour Policy
- Responsive Repairs Policy
- Safeguarding Adults Policy
- Safeguarding Children Policy

- Tenancy Management Policy
- Vulnerability, Inclusive Services & Reasonable Adjustments Policy
- Housing Ombudsman Complaint Handling Code (2024)

Version control

Note: minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
1.0	First integrated version (Bromford & Flagship)	Customer SLT	16 December 2025
1.1	Updated template (including the logos on titlepage footer and wording in approval section)	n/a	6 August 2026