



EKAYA HOUSING ASSOCIATION

CUSTOMERS THAT POSE A RISK POLICY

1. Background

- 1.1 Ekaya Housing recognises the importance of meeting customers' expectations of a high standard of service delivery. However, this must not come at the cost of the abuse of its services or the mistreatment of its staff. Proper handling of the very few instances of unacceptable behaviour from service users and customers is one of Ekaya Housing's highest priorities.
- 1.2 This policy applies to all staff working for or with Ekaya Housing Association (Ekaya), including contractors, consultants, Board Members, and other agents working on behalf of Ekaya and volunteers.
- 1.3 Ekaya has a responsibility to provide a workplace that is safe, healthy and harassment-free.

2. Policy

- 2.1 On occasion, residents of Ekaya may present a risk to the safety of our staff, contractors, volunteers, Board Members and other agents who work on our behalf. If staff experience violence or threatening behaviour it is essential that it is reported.
- 2.2 Ekaya will act quickly after receiving any report and will assess any potential risk that a customer poses to staff. We will ensure precautions are in place where necessary so that staff, contractors, agents, volunteers and Board Members are not at risk in the future.
- 2.3 Where a criminal act occurs (e.g. assault, hate crime), this must be reported to the police.

3. Who is a resident/potential resident?

- 3.1 For the purposes of this policy, a resident or potential resident is considered to be:
 - any person who holds one of our tenancy agreements or licences
 - any person who is in the process of being referred to us for re-housing
 - family members, friends or associates of the tenant (including sub-tenants) who either

- live at or are visiting that address
- anyone who supports or represents one of our residents

4. Unacceptable Behaviour

- 4.1 Ekaya believes that all residents have the right to be heard, understood and respected. We also believe that our staff have this right. Ekaya will not tolerate threatening or abusive behaviour.
- 4.2 Some examples of behaviour that must be reported, include but are not limited to:
- Physical violence
 - Threatening behaviour
 - Abusive language, such as swearing aimed at the person
 - Inappropriate sexual conduct
 - Abusive language directed at a staff member on the telephone or any medium such as email, the website or social media
 - Dangerous pets
 - Vexatious complaint
 - Harassment of staff members or contractors

5.0 Staff Harassment

- 5.1 Staff have the right to carry out their duties free from harassment or threats of harassment. We ask all residents to respect that staff are delivering services and communication decisions on behalf of the organisation.

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

- recording telephone discussions and publishing the information online such as through social
- contacting staff using their personal details or social media presence such as Facebook, Instagram or LinkedIn.
- publishing personal, sensitive or private information about staff online or other public domains such as noticeboards or newsletters.

6.0 MANAGING UNACCEPTABLE BEHAVIOUR

- 6.1 If there is an incident involving someone working on behalf of Ekaya we must take action to ensure the safety of staff, contractors or any other agency working on our behalf. This includes sharing information with statutory agencies such as the police, where appropriate.
- 6.1 The welfare and wellbeing of staff is a priority and we are committed to acting swiftly following the report of any incident involving a customer to ensure that staff, contractors and any other agents working on our behalf are protected. Any criminal act must be reported to the police.
- 6.2 We have a range of systems in place to ensure staff are supported following any incident. Once a line manager is aware that an incident has occurred, they must take steps to ensure the employee's welfare and wellbeing, which includes meeting with the individual as soon as possible to discuss the incident, introducing extra precautions if needed and discussing any issues arising out of the incident at the staff member's 1:1 meetings.

- 6.3 A decision to put the individual in the Customers That Pose A Risk File, to put a risk alert on the IT system and a note in the relevant resident file, must be based on a specific incident or expression of clearly identifiable concern, rather than general opinions about that individual. The decision to add a resident to the Customers Who Pose A Risk File is with the line manager for the member of staff affected or to whom a contractor reports if the issue is raised by a contractor or consultant.
- 6.4 Ekaya may be told residents are a risk by other organisations such as the police, NHS, Local Authority or another housing provider. Ekaya has a duty to take these reports seriously and will complete a risk assessment.
- 6.5 Where we are carrying out an eviction, we will carry out an Eviction Risk Assessment to put in place the necessary precautions for staff who will be attending.

7 Risk Assessment

- 7.1 The staff member's line manager will carry out a risk assessment within five working days of any notification. The aim of the risk assessment is to:
- increase the safety of staff, neighbouring tenants and others by acknowledging, highlighting and acting on any probable risk of harm
 - ensure that residents who are involved in incidents receive a fair risk assessment which incorporates any vulnerability or support needs that may have contributed to the incident
 - enable staff to understand how to identify, assess and manage risk
 - enable staff to understand their responsibilities and to take part in the process effectively

8 Contacts with Residents

- 8.1 We will write to residents within five working days after completing the risk assessment, telling them about any risk alert on their record. The letter will include information to inform the customer that:
- they have had a risk alert added to their record and the reasons for doing so
 - how this action may affect the services they receive from Ekaya
 - when this risk alert will be automatically reviewed
 - confirming their right to appeal this risk alert
- 8.2 There may be extreme cases where the risk assessment has determined that informing the individual would in itself create a substantial risk of a violent reaction from them. For example, because of the nature of the incident or the risk to another individual. In these cases, the risk assessment may recommend that it would not be appropriate to inform the individual that they are a risk.

9 Contact with tenants with a Risk Alert

- 9.1 Ekaya will manage contact with residents with a risk alert on their record on a case-by-case basis. We recognise that all customers are different and all risks are different. We will tailor our actions to the customer in order to protect both them and our staff.

9.2 Some examples of actions that may be taken as a result of a risk alert include:

- Visit in pairs
- No female/male officers to visit alone
- Only meet with resident at head office
- Designated contact person at Ekaya
- Resident only able to communicate in writing, except in an emergency
- providing a single point of contact
- 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.

This list is not exhaustive.

10 **Reviewing resident Alerts**

10.1 We will review all resident risk alerts every 12 months unless an incident, new information or resident request (through our appeals process) means this is done earlier. The 12 months will run from the date of the particular incident or notification.

11 **Safeguarding and Vulnerability**

11.1 A resident incident may indicate a safeguarding issue involving the resident. Where an incident occurs and a staff member has a concern, they should follow the procedures set out in the Safeguarding policy.

11.2 We also recognise that some of our residents are vulnerable or have individual support needs due to one or more of a variety of causes and that this may be picked up when an incident occurs. In cases where a resident may benefit from tailored or enhanced services, we will signpost to agencies or contact their support worker.

12 **Appealing Decisions or Actions**

12.1 If a resident disagrees with a decision Ekaya has made, they should contact the person that has written to them regarding the alert.

12.2 If the residents still believe the wrong decision was made, they can ask for a formal review of the decision by the individual's line manager.

12.3 If the decision is within the policy, there will be no further appeal process.

13 **Equality and Diversity**

13.1 Ekaya recognises that residents should be treated equally and fairly regardless of their age, disability, gender reassignment, pregnancy and maternity, race, religion and belief, sex or sexual orientation and we will not discriminate in implementing this policy and procedure.

13.2 Ekaya will be sensitive to residents' individual needs and will tailor our services and approaches accordingly.

13.3 All residents will have access to this document upon request.

13.4 Equality and Diversity training is mandatory for all Ekaya staff.

14 **Links to other Policies**

14.1 This policy links with and compliments Ekaya’s Lone Working Policy and will be compliant with Ekaya’s General Data Protection Regulations (GDPR) and Data Protection policies.

15 **Policy Approval**

Approval Date:	October 2024
Approval By:	Policy & Performance Committee
Policy Owner:	Head of Operations
Consultation Completed:	October 2024
Next Review Date:	October 2027