



KINGDOM
Group

MORE THAN A HOME

Respectful Engagement Policy



Approved: July 2025
Next Review: July 2030

Respectful Engagement Policy

1. Statement of Intent

This policy has been developed in accordance with the Scottish Public Services Ombudsman's (SPSO) model policy on respectful engagement. This policy covers Kingdom Housing Association Limited and our subsidiary companies as part of the Kingdom Group.

This policy is designed to ensure everyone has the right to be heard, understood, and treated with respect. We are committed to being open, accessible, and responsive to all customers. However, there are times when the behaviour or actions of some individuals make it difficult for us to deliver services effectively. In a small number of cases, this behaviour becomes unacceptable because it is abusive towards our employees or disrupts our processes.

When this happens, we must take steps to protect our staff and maintain our ability to provide services to all customers. We will always consider the impact of such behaviour on our work and our service to others.

Our Respectful Engagement Policy sets out how we will manage these situations.

At the Kingdom Group, we recognise that individuals may act out of character in times of trouble or distress, which may result in them behaving unacceptably. We also understand that if an individual has a history of challenging or inappropriate behaviour or has difficulty expressing themselves, they still have a legitimate need to raise their concerns with us.

The reasons for complaining may contribute to the way in which an individual presents their complaint. Regardless of this, we will treat all complaints seriously and properly assess them. Kingdom Group has a Complaints Handling Procedure which deals with this.

We also recognise that if individuals are angry, demanding or persistent, this may result in unreasonable demands on time and resources or unacceptable behaviour towards our employees or their agents. We will, therefore, apply this policy and the associated procedures to protect our staff from unacceptable behaviour such as unreasonable persistence, threats or offensive behaviour.

We will comply with discrimination legislation and ensure all individuals are treated fairly where they have a "protected characteristic" of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity as defined by the Equality Act 2010.

We are committed to the principles of good corporate governance and sustainability and will endeavour to develop fair and consistent policies, procedures and practices.



In line with our commitment to equality and diversity, this policy can be made available in a variety of formats, including large print, translated into another language or other media. Reasonable adjustments will also be made to assist individuals who have a disability.

2. Defining Respectful Engagement

Aggressive or Abusive Behaviour

Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether oral or written) that may cause our employees to feel afraid, threatened or abused, and may include threats, personal verbal abuse, derogatory remarks and rudeness.

The threat or use of physical violence, verbal abuse or harassment towards us is likely to result in us ending all direct contact. We may report incidents to the police. This will always be the case if an individual uses or threatens physical violence.

We also consider any inflammatory statements and unsubstantiated allegations to be abusive behaviour.

Unreasonable Demands

A demand becomes unacceptable when it starts to (or when complying with the demand would) substantially impact our work. Examples of actions grouped under this heading include when an individual:

- Repeatedly demands responses within an unreasonable timescale.
- Insists on seeing or speaking to a particular employee, or a member of the Board of Management, when that is not possible or appropriate.
- Repeatedly changes the substance of their complaint or raises unrelated concerns.
- Makes the same complaint without any new evidence being presented.
- Causes us to spend an excessive amount of time on their demand and, in doing so, disadvantages others who access our services.

Unreasonable Levels of Contact

Sometimes the volume and duration of the contact an individual has with us causes us problems. This can occur over a short period, for example, the number of calls made to us in one day or one hour. It may occur when an individual repeatedly makes long telephone calls to us or inundates us with copies of information that has already been sent or we deem to be irrelevant.



We will consider that the level of contact has become unacceptable when the amount of time we spend talking to an individual on the telephone, or responding to, reviewing and filing emails or written correspondence, impacts our ability to give that individual or others an appropriate level of service.

Unreasonable Use of Our Complaints Process

Whilst complaints give us valuable information we can use to improve customer satisfaction, we will regard an individual's contact as unreasonable when the effect of their repeated complaints is to harass, or to prevent us from pursuing a legitimate aim or implementing a legitimate decision.

We consider access to a complaints system to be important, and it will only be in exceptional circumstances that we would consider an individual's repeated use as unacceptable. We reserve the right to do so in exceptional cases.

3. Management of Respectful Engagement

We do not take decisions about managing unacceptable behaviour lightly. Our aim is always to maintain safe, respectful, and professional contact with everyone. There may be times when, due to someone's behaviour, we decide to limit how they can contact us. We will always explain our decision and the reasons for it. Examples of actions we may take include:

- Asking that all contact is in writing or through a third party.
- Limiting telephone calls to set times or days.
- Restricting contact to a named member of staff.
- Meeting only by appointment.
- Returning documents, or in extreme cases, advising that further irrelevant documents will be destroyed.
- Any other action we consider reasonable and necessary.

If someone behaves aggressively, abusively, or offensively, our staff have the right to warn them that their behaviour is unacceptable and end the communication if it continues. In serious cases, we may write to confirm they have been placed on a 'no personal contact' list, meaning all future contact must be in writing or via a third party.

We will continue to provide essential services, such as emergency or urgent repairs, but this may be done with restrictions—for example, two staff members attending. We will also consider any mitigating circumstances before making decisions. This includes recognising where someone's behaviour may be affected by a protected characteristic under the Equality Act 2010.



Where we consider an individual's continued correspondence on a wide range of issues to be excessive, we may tell them that only a certain number of issues will be considered in a given period and will ask that they limit or focus their requests accordingly.

We will not accept any correspondence that is abusive to our employees or contains allegations that lack substantive evidence. We will tell the individual that we consider their language offensive, unnecessary and unhelpful and will ask them to stop using such language. We will state that we will not respond to their correspondence if the action or behaviour continues.

We may take the following actions to manage unacceptable conduct:

- Limit contact to telephone calls at set times on set days.
- Restrict contact to a nominated employee who will deal with future calls or correspondence.
- Meet by appointment only.
- Restrict contact to writing only.
- Return any documents or, in extreme cases, advise that further irrelevant documents will be destroyed.
- Take any other action that we consider appropriate.

In exceptional cases, we may refuse to consider further contact if we believe continuing would have a serious impact on staff or services. We will always take into account the effect on the individual and any wider public interest before making such a decision. This includes helping them access communications or advocacy support if required.

We will always tell the individual what action we are taking and why.

4. Appeals

An individual has the right to appeal against any restriction we impose where they feel that this is wrong or unjust. Appeals should be made in writing, outlining the reasons that the individual disagrees with our decision, and we will provide a decision within 10 working days.

We will deal with any appeal impartially and, wherever possible, we will arrange for a new manager who was not involved in the original decision to consider the appeal. There is no further right of appeal.

If an individual continues to be dissatisfied with our decision, they are entitled to an independent review by the Scottish Public Services Ombudsman, except for:

- Kingdom Initiatives Limited Customers, Sharing Owners and Home Owners, including those receiving factoring services from us, are able to refer their complaint to the First Tier Housing Tribunal.



5. Use of Domestic CCTV Systems and Personal Recording Equipment

We expect all customers to use CCTV and personal recording equipment responsibly and with respect for others' privacy, including visitors, neighbours, staff, and contractors. Misuse—such as recording anyone without notice or sharing footage inappropriately—may be considered unacceptable behaviour. This section explains your responsibilities to ensure your use of these devices remains respectful and lawful.

A domestic CCTV system refers to the use of any video surveillance equipment mounted or fixed on your home. It can also include cameras fitted to doorbells as part of a smart entry system. Personal Recording Equipment refers to items such as video cameras, phones, and tablets with the ability to record.

The domestic CCTV system or your Personal Recording Equipment being used inside your home may capture images of people other than you and your family, for example, people visiting your home such as our employees or contractors, or other Customers. You should remember the following requirements if you use any kind of CCTV or recording equipment:

- There must be clear signage at your home referring to the use of CCTV, or otherwise, you should make other people aware of the fact that they are being recorded. Some individuals may prefer not to have their image captured or recorded, and we would request that you respect this position and the privacy of others where possible.
- You should remember that publicly uploading or streaming footage of individuals may not be classed as justifiable under data protection laws. In most cases, sharing these images and recordings would not be classed as justifiable under these laws. As above, any decision to do this would put you at risk of regulatory enforcement and/or legal claims.

6. Role of Departments

The Departmental Manager or their Designated Officer will:

- Support staff in applying this policy and the associated procedure.
- Ensure relevant staff are advised of the sanction(s) that have been imposed.
- Make appropriate decisions relating to this policy and its associated policies.
- Be responsible for ensuring appropriate incident forms are completed where necessary.
- Record any restricted contact on the individuals record(s)
- Ensure the Visitor Alert Procedure is implemented, where necessary.
- Review the status of all restricted contact arrangements within their department on a regular basis.
- Re-consider the restricted contact if the individual modifies their action or behaviour.
- Review risk assessments to protect the health and safety of our employees.



7. Role of our Staff & Customers

At Kingdom, we are committed to creating a welcoming, safe, and respectful environment for everyone. We ask all staff and customers to uphold our values of C.P.R. – Courtesy, Professionalism, Respect and we ask our staff to remember our CARES Values in every customer interaction.

Our CARES Values:

Customer-centred – Putting customers at the heart of what we do.

Accountable – Owning our actions and decisions.

Respectful – Treating everyone with dignity and courtesy.

Efficient – Working effectively and making the best use of time.

Supportive – Helping and understanding each other.

We want all conversations to be polite, respectful, and productive. This means:

- Speaking to each other calmly and courteously.
- Using inclusive, positive language.
- Listening to one another's views.
- If behaviour becomes aggressive, threatening, or abusive, we may need to end calls or meetings. We may also feel it necessary to move to an alternative means of communication for everyone's safety.

We know that issues can sometimes be frustrating or upsetting, but by working together with courtesy, professionalism, and respect, we can find solutions that meet everyone's needs.

8. Monitoring and Review

Actions taken under this policy will be reviewed by departmental directors, and summary updates provided to the Board through the departmental reporting cycle.

This policy will be reviewed 5 years from the date of implementation or latest review, which will be the date the policy is approved by the Board of Management, or earlier if deemed appropriate. In the event that this policy is not reviewed within the above timescale, the latest approved policy will continue to apply.



KINGDOM HOUSING GROUP
CUSTOMER CONDUCT POLICY

Policy drawn up with reference to:

Scottish Public Services Ombudsman Respectful Engagement Policy

Housing (Scotland) Act 2001

Housing (Scotland) Act 2014

Private Housing (Tenancies)(Scotland) Act 2016

Data Protection Act 2018 (GDPR)

Equality Act 2010

Prepared by the Customer Resolutions Manager

Next review date: No later than July 2030

