

ENGAGEMENT POLICY



APPROVED BY HHP BOARD:

EFFECTIVE DATE:
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INTRODUCTION

- 1.1 We are committed to offering a high-quality service and ensuring we treat everyone with dignity and respect.
- 1.2 We aim to support everyone engaging with us to do so positively, to help us provide them with the best possible level of service. In some circumstances, we need to take action to protect our staff or service from types of engagement which impact our ability to provide a service or the well-being of our staff. This policy sets out how we identify and respond to those types of engagement.

AIMS

- 2.1 The aim of this policy is to allow those who engage with us to do so in a straightforward manner. It allows us to keep customers at the heart of our processes and enables us to better understand how to improve our services by learning from and acting upon customer engagement.

WHO IS COVERED BY THIS POLICY?

- 3.1 This policy covers anyone who engages with HHP including, but not exclusively, service users, local council members, members of the public and stakeholders.
- 3.2 Engagement includes all forms of contact including verbal (over the phone, in person, etc.), written (letters, emails, online forms, etc.) as well as contact at HHP events, training sessions and online. Online comments about HHP or individual staff members, which are shared publicly or in a forum or way that means they are not private, count as engagement even when they are not shared directly with HHP.

SUPPORTING POSITIVE ENGAGEMENT

- 4.1 We support positive engagement and will let people know how they can engage positively with us by providing information about how they can access our service and request adjustments and explaining clearly what we need from them to provide the best possible service.
- 4.2 Supporting positive engagement includes supporting people to express concerns about HHP and service in a constructive manner by ensuring we apply our Complaints Policy fairly and openly when individual concerns are raised.

PROVIDING ADDITIONAL SUPPORT

- 5.1 We understand that people who come to us may have specific needs and requirements. We will ensure our staff have appropriate training to identify where additional support may be needed and are supported to treat our users with kindness and compassion.
- 5.2 We will seek to defuse and de-escalate situations. We regularly signpost to organisations who can provide independent advice and support.

MAKING REASONABLE ADJUSTMENTS TO OUR SERVICE

- 6.1 We are committed to ensuring that all people have an equal opportunity to access our services. We do this actively by considering accessibility when designing the way we provide our service. We try to anticipate our users' requirements and encourage all users to tell us if we need to adjust the way we deliver our service from them. If we decide we need to manage engagement with an individual, we will consider whether they have accessibility needs that we should take into account when doing so.

OUR APPROACH TO MANAGING ENGAGEMENT

- 7.1 While we will work to support positive engagement, there are some situations that we will need to respond to or manage because of the negative impact on the wellbeing of our staff and our ability to provide a service. We do not need to actively respond to or manage any form of engagement simply because it is different or unusual. We also accept that individuals may be upset and distressed when they contact our office, and we want to support them to engage with us.
- 7.2 We will seek, whenever possible to restore the relationship and to ensure we can communicate as normal. However, we recognise there may be a need to act if the situation becomes unacceptably challenging, is resulting in unreasonable demands on our office or unreasonable behaviour towards HHP staff and others.
- 7.3 When we need to manage engagement in this way, we will ensure responses are proportionate to the behaviour and the impact on HHP and our staff. This guidance gives general advice, but we will, whenever possible clearly explain the reason for any specific decision to the person affected and/or keep a separate documented record if that is not possible or appropriate.

- 7.4 When making decisions, it is important to remember that we need to assess behaviour reasonably and consistently. Although at times our resources may be under more pressure than others, any assessment should take into consideration whether we would be able to deal with the behaviour if we were operating effectively and normally. We may also take into consideration whether the issue is due to staff training requirements.
- 7.5 At all times, we will work to ensure our response is proportionate and necessary and uses the least restrictive method available.
- 7.6 The decision whether or not to take a management approach does not affect the right of any member of HHP staff to end contact they find personally distressing or uncomfortable. This is because it is not appropriate for anyone to continue to engage if they are becoming distressed or it is having other negative impact on them. And this is the case even if we decide that the criteria for further management is not met.

RESTORATIVE APPROACHES, RECOVERING THE RELATIONSHIP

- 8.1 Where possible, we should seek to act in ways that recover the relationship.
- 8.2 For example, staff may seek to defuse and de-escalate by suggesting breaks if conversations are becoming heated; intervene early before behaviour escalates and make proactive adjustments to our service to help individual users manage the anxiety and stress of engaging with us. Actively managing expectations can help to prevent issues from arising in the first place.
- 8.3 Reasonable adjustments should be made when appropriate to help individuals remain actively and positively involved with us.
- 8.4 It can be detrimental to positive engagement to continue a conversation which has become circular or repeats statements already made by other colleagues. If this happens, we will end the conversation and seek to re-engage again later, if appropriate.

ACTIVELY MANAGING BEHAVIOUR, DELIVERING OUR SERVICE

- 9.1 When restorative approaches are not possible, appropriate or have been tried and failed, an active management approach will be taken. Active management seeks to maintain our ability to deliver our services while minimizing the impact of the situation

that is causing the disruption. It is important to note that this may not be the fault of an individual but because of circumstances out with their control.

9.2 The approach used should be tailored to the individual and the situation, this could include:

- Restricting contact by channel (e.g phone or email) or to a named person.
- Restricting the ability to request recording is paused if call recording is enabled.
- Not providing direct contact details or staff names (where there is a risk this will lead to harassment.)
- Communicating through a third party such as an advocate rather than direct contact.
- Restricting time/volume of contact.

9.3 To ensure consistency, a decision to actively manage a situation needs to be made by a Manager. All such restrictions require to be supported by evidence and can be challenged with an appeal to a Director.

9.4 Restrictions are normally subject to review at appropriate intervals while we are providing a service. We retain the discretion to not include a review if the reason for restriction means that would not be appropriate (for example if it is to protect staff from violence.) The timing and circumstances where review would be considered should be explained clearly to the person who is under restriction at the time restriction is put in place.

PROTECTING OUR STAFF AND OTHERS

10.1 There are some situations that we are not able to accept, and we will always take action. We have **zero tolerance** of threats, violent and abusive behaviour towards staff. This is to ensure their own safety and wellbeing and also protects the office and others.

10.2 There is advice below on identifying situations that we do not find acceptable. Staff always need to take action to respond to or disengage when these happened and should always raise with their line manager what has happened and any steps they

were able to take. It is important to note that in some situations, the only appropriate action is to end contact immediately.

Phone or face-to-face contact

- 11.1 During phone or face-to-face contact, staff should issue a warning before ending contact if it safe and they consider it appropriate to do so, but a warning is not required if it would be unsafe to do so or the language is intense, deeply upsetting or extreme.
- 11.2 Staff may also, if a call has been paused, issue a warning that the recording will resume if the behaviour continues.
- 11.3 If staff are informed, they are being recorded for later use in public or are being live-streamed, they need to end contact politely but immediately.

Written or email correspondence to HHP

- 12.1 If we receive violent or abusive correspondence, the sender should be informed this is unacceptable. This could be done by a manager or from an account that is not linked to an individual if this has been aimed at an individual staff member.
- 12.2 The decision that correspondence is unacceptable should be made by a manager to ensure consistency. Where this behaviour is repeated despite warnings, or an individual instance is regarded as at the higher end of abusive we may need to take steps to restrict methods of contact with the office.

Online, web and social media.

- 13.1 This is a fast-moving and changing area; nevertheless, the principles outlined in this policy will still apply. HHP will follow the best practice advice available at the time of any incident and note and record the reasons for our decisions. Actions may include;
 - Blocking accounts or using other technical options available on the relevant platform to minimise exposure.
 - Removing inappropriate comments on our social media accounts.
 - Using the relevant social media platform's own reporting mechanisms to seek to have the content removed.

- Limiting contact with the individual through other channels to reduce risk to staff – this could include ensuring the person is not provided with contact details.
- Direct threats on social media should be dealt with like any physical threat (see below.)

Physical threats

- 14.1 When a physical threat is made, we will normally report it to the police. This includes situations when the threat is made is not to us but a threat to harm a third party.
- 14.2 It should be noted that deciding to contact the police is a matter of judgment and in some cases may not be appropriate (if, for example, the threat is immediately withdrawn and was clearly flippant). However, this is an important safeguard and the person who receives the threat, and particularly anyone who has been personally threatened, should not make a decision to not inform the police alone. It should be made by a manager who should clearly record the decision. The manager should take into account not only the views of the staff member but also consider the impact on other staff who may come into contact with the individual. If other staff have witnessed the event, they should all be asked to put this on record.

IDENTIFYING TYPES OF ENGAGEMENT WE NEED TO MANAGE

- 15.1 It is important we are consistent when we take approaches to manage engagement and below are examples of when we may need to use one of the approaches above. This list is not exhaustive and we can manage types of engagement or behaviour not listed if it is impacting negatively on individuals or our ability to provide a service.

Violence

Violence towards staff or others will not be tolerated

- 16.1 Violence is not restricted to acts of aggression that may result in physical harm. It also includes actions or language (whether verbal or written) that could reasonably cause someone to feel offended, afraid, or threatened.

Abuse

Abuse of staff or others will not be tolerated

- 17.1 Abusive language includes all language that is designed or could be perceived as designed to insult or degrade, is racist, sexist or homophobic, or which makes serious allegations that individuals have committed criminal, corrupt or perverse conduct without and supporting evidence.
- 17.2 Language which makes unfounded allegations about an individual's professional ability or capability or seeks to belittle or denigrate them personally is also unacceptable.
- 17.3 Violent or abusive comments sent to HHP which are not aimed at us but at third parties are still unacceptable because of the effect that listening or reading them may have on our staff.
- 17.4 Comments made about HHP or HHP staff on social media which are designed to be, or which it is reasonable to assume may be, shared or made public are also covered for the same reason, even if they are not shared directly with us.

Harassment

- 18.1 Harassment of staff, whether accompanied or not by violence or abusive comments is not acceptable.
- 18.2 Harassment would include:
 - Repeatedly contacting or continuing to contact individual staff members when previously asked not to.
 - Contacting staff outside of the office to seek to influence them.
 - Targeting and naming them on public or other easily shared social media.

Contact outside the office

- 19.1 Any contact with an individual or organisation outside the office should be discussed with a manager who should decide whether this should be recorded. This includes contact via social network sites and includes social contact in public spaces, This, in

part, reflects the need to ensure there is no appearance of bias and that any conflicts of interest that may not have been initially apparent are picked up (for example, where there is significant social overlap.)

Naming and targeting staff publicly

- 20.1 We discourage those who wish to criticise HHP online from naming individuals. We encourage complaints regarding HHP to be directed to our office and to follow our Complaints Process. Naming of individuals online may lead to restrictions being put in place.
- 20.2 Statements that individuals intend to record and then use that recording publicly or to live stream would be regarded as harassment even if there is no directly abusive content to the statement.

Demands on our office

- 21.1 A demand becomes unacceptable when it starts to (or when complying with the demand would) impact substantially on the work of the office. An example of such impact would be that the demand takes up an excessive amount of staff time and, in so doing, disadvantages other uses and prevents us from providing a service to the person making the demands within a reasonable timescale.
- 21.2 Examples of actions grouped under this heading include:
- Repeatedly demanding response with an unreasonable timescale.
 - Insisting on seeing or speaking to a particular member of staff when that is not possible
 - Repeatedly changing the substance of their issue or raising unrelated concerns.

Levels of contact

- 22.1 Sometimes the volume and duration of contact made to our office causes problems. This can occur over a short period, for example, a number of calls in one day or one hour. It may occur over the life-span of an issue when someone repeatedly makes long telephone calls to us or inundates us with information that has been sent already or

that is irrelevant to the service we are providing or sends repeated emails raising the same or similar issue.

- 22.2 We consider that the level of contact has become unacceptable when the amount of time spent on the telephone or responding to emails or written correspondence or managing the contact impacts on our ability to provide a service to that person or organisation, or to provide a service to others.

Refusal to co-operate

- 23.1 Repeated refusals to co-operate makes it difficult to find a resolution. We will always seek to assist someone if they have a specific, genuine difficulty complying with a request. However, we consider it is unreasonable to bring an issue to us, for example report a repair or complaint, and then not respond to any subsequent reasonable requests to allow us to provide a resolution.

Use of the complaint processes

- 24.1 We ensure our policy seeks to resolve any negative engagement as close as possible to the point of service delivery and to conduct thorough, impartial and fair investigations of any negative allegations that may be instigated. We support the rights of people and organisations to complain more than once if subsequent incidents occur.
- 24.2 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. We consider access to our complaints system to be important, and it will only be in exceptional circumstances that we would consider such repeated use as unacceptable, but we reserve the right to do so in such cases, such decisions can only be made by a member of the management team.

SUPPORTING STAFF

- 25.1 Staff will receive training to defuse and actively manage situations. They are encouraged to seek support if any contact causes them concern or distress.

Empowering staff to end contact they find distressing

- 26.1 All staff have the authority to end any engagement or interaction which they find personally distressing or difficult at that point of occurrence. Staff should not feel they need to continue to engage in contact if it is having a negative impact on them or which is making them feel uncomfortable. Whenever possible and appropriate, staff should seek to end the engagement professionally and politely. This can include:
- Explaining they find the situation uncomfortable or distressing and explaining what they need to happen to be able to continue.
 - Ending a call
 - Ending an interview/meeting
 - Not reading an email or other correspondence to the end
 - Disengaging from HHP social media
- 26.2 When this occurs, they should take a note and discuss with their line manager as soon as possible.

Supporting Staff

- 26.3 When an incident has occurred or active management approach has had to be used, all staff involved are encouraged to have a de-brief meeting with their line manager and agreed actions from that discussion noted. This ensures that we are providing support to all colleagues. Staff will be able to take a short time away from all contact if requested and may request to no longer have contact with a specific individual.
- 26.4 Staff can ask for correspondence to be sent in the name of a senior manager or to be removed completely from involvement in engagement in a particular case or interaction. This may be appropriate if they have concerns about threats; have been or are at risk of being named publicly; or any other factor makes them more vulnerable.

APPROACH TO COMMUNICATING DECISIONS

- 27.1 We will provide guidance and support to staff to help them meet our standards to communicate with respect. When communicating that the situation needs to change or an active management technique is being introduced, we should always bear in mind the following:

- Explain the situation neutrally and avoid blame, there may be many reasons why the situation has become difficult. Engaging with landlords can be stressful, people's situations needs, and abilities are complex. We may inadvertently trigger a memory of a difficult experience or engage in a way that is difficult for someone who has different needs or perspectives.
 - Look for opportunities to restore the relationship. Try to see the situation from the points of view of all involved. When possible or appropriate, seek ways to help someone demonstrate their needs and perspective rather than asking them to defend their position. This can help move the relationship forward.
 - Be clear and straightforward. We can provide access to more information but that will not be required in all situations. Instead, a clear statement which focuses on the interaction and explains what has been decided and why is sufficient. Provide evidence but avoid dwelling on detail unnecessarily.
 - Ensure the communication is accessible, inclusive and meets the needs of the person.
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RECORDING AND SHARING INFORMATION

Recording

- 28.1 It is important that we keep a clear record whenever we have had to:
- Actively work to restore a relationship to avoid restrictions
 - Put restrictions in place
 - Take a zero-tolerance approach
- 28.2 This should include storing any online evidence such as screenshots.
- 28.3 Material that is being stored as evidence may be distressing. This should always be stored in a way that it cannot be accidentally or unintentionally accessed- files should be named to indicate they contain distressing material. Physical documents can be stored inside envelopes.
- 28.4 Individuals can feel shame and distress about situations that have become difficult. While we need to record what has happened, we should do so factually and ensure it can only be accessed by those who need to do so. Some of the actions we take may need to be highlighted in our system to allow staff to implement decisions or to be aware that steps may need to be taken to manage some interactions. When doing so, we should record the minimum required.

Sharing information

- 29.1 We need to ensure all relevant staff are aware of actions taken and restrictions to make sure our actions are effective. This will vary depending on the action and decisions on sharing should be noticed and recorded but as a minimum:
- Where the behaviour relates to phone contact, staff who respond to our 0300 and publicly available numbers on our website should be informed.
 - For emails, we should ensure this information is shared with people who monitor online and other web contact.
- 29.2 If you find that a member of HHP staff has been publicly named in relation to their duties, the following steps should be taken:

- An email should be sent to the member of staff's line manager. Where applicable, a link to the relevant webpage should be provided.
 - To minimise impact on the named person, this information should not be shared any more widely than necessary to enable action to be taken.
- 29.3 The member of staff's line manager, and in their absence an alternative manager, will inform the member of staff in private about the content of the material. The affected member of staff will have a say in what, if any, action is taken in response.
- 29.4 Action to support the member of staff may include an informal discussion and an offer of counselling.
- 29.5 Any instances of HHP staff being publicly named online will be recorded and kept confidentially by HHP. We may actively seek to have the persons's name removed unless the risk that would escalate the situation are felt to be significant. The incident will be shared with the Executive Team. It is for the affected individual and HR to determine whether a record is made in the staff member's personal records.

INTERPRETATIONS & ABBREVIATIONS

The following interpretation and abbreviations are used in this policy:

WORD	INTERPRETATION
<i>HHP or Partnership</i>	Hebridean Housing Partnership
<i>Board</i>	Means the Board of the Hebridean Housing Partnership
<i>Board Members</i>	All Members of the Board including co-opted Members
<i>Executive Team</i>	Chief Executive, Director of Finance & Corporate Services, Director of Operations and Head of Executive Office.
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	

If there is a conflict between this Policy and any statutory provision or regulation, the latter shall prevail.



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S), Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, Stornoway, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SCO35767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number PF000183

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