

RESPECTFUL ENGAGEMENT POLICY

APPROVED BY HHP BOARD:
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hebridean housing
partnership

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INTRODUCTION

- 1.1 This policy is based on the Respectful Engagement Policy used by the Scottish Public Services Ombudsman. It replaces our previous Engagement Policy.
- 1.2 This Policy complies with applicable legal and regulatory requirements, including the Equality Act 2010, Human Rights Act 1998 and relevant data protection legislation. It supports compliance with the Scottish Housing Regulator's Regulatory Standards by ensuring fair, proportionate and transparent management of customer engagement. The Partnership is committed to promoting equality, diversity and inclusion, and will make reasonable adjustments to ensure services are accessible to all.

AIMS

- 2.1 We aim to support everyone engaging with us to do so positively. This helps 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.

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 everyone has an equal opportunity to access our services. We will consider whether a person's behaviour or engagement may be linked to a disability, health condition, communication need, trauma, vulnerability or other personal circumstance before deciding whether to manage or restrict engagement. We will consider reasonable adjustments or additional support that may help the person engage positively with us, including changes to communication methods, additional time, plain language, alternative formats, involvement of an advocate or representative, agreed communication preferences, or other appropriate support measures. Restrictions will not be applied because a person communicates differently, is distressed or requires additional support. Any restriction must be necessary, proportionate and the least restrictive option available, while ensuring the person can still access services, raise concerns, make complaints and receive essential information.
- 6.2 HHP will not make assumptions about the cause of an individual's behaviour and will seek to understand whether a disability, health condition, communication need, trauma or other personal circumstance may be contributing to the situation before restrictions are considered.

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 offices 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. There is more information on this in the supporting staff section below.
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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 our service and, in some cases, we may take a multi-disciplinary approach, involving staff from across our service and seeking assistance on a pseudonymised basis from professionals outside the organisation or third sector experts where we consider the person is vulnerable and restrictions would have a disproportionate impact.

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 minimising 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.
 - 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 will normally be reviewed at least every 12 months, unless there is a clear reason why review would be inappropriate, for example where there is a continuing risk to staff safety. The outcome of any review will be recorded and, where appropriate, communicated to the affected individual.

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 this happens 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.

Telephone or face-to-face contact

- 11.1 During phone or face-to-face contact, staff should issue a warning before ending contact if it is 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 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 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.

- 14.3 If the complainant makes a clear and immediate threat which risks the office or anyone else, staff should contact the police immediately and update their manager and leadership team as soon as possible.

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 any 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. 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.

Sexual Harassment

- 19.1 Sexual Harassment of any form is unacceptable. Sexual harassment is when a person is subject to unwanted conduct which is of a sexual nature. The unwanted behaviour must have either violated the person's dignity, whether it was intended to or not, or created an intimidating, hostile, degrading, humiliating or offensive environment for the person, whether it was intended or not.
- 19.2 All instances of sexual harassment must be communicated immediately to a manager.

Contact outside the office

- 20.1 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

- 21.1 We encourage those who wish to criticise HHP online to name the office rather than 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.
- 21.2 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

- 22.1 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 users and prevents us from providing a service to the person making the demands within a reasonable timescale.
- 22.2 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

- 23.1 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 lifespan 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.
- 23.2 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

- 24.1 We want people to work with us. This can include agreeing with us the service we are providing, the issues we will look at; providing us with further information, evidence or comments on request; or helping us by summarising their concerns or completing a form for us.
- 24.2 Repeated refusals to co-operate make 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 process

- 25.1 We ensure our policy seeks to resolve any negative experience 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.
- 25.2 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.
- 25.3 Any restriction applied under this policy will not prevent an individual from accessing our complaints process, exercising their statutory rights, reporting repairs, raising safeguarding concerns, fulfilling tenancy obligations, or receiving essential communications from HHP. Where restrictions are in place, we will identify an appropriate method through which these services can continue to be accessed.

SUPPORTING STAFF

- 26.1 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

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. This is the case whether or not they consider it meets the zero tolerance criteria. 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

27.1 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.

27.2 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

28.1 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 following¹:

- 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, for example a copy of this policy, 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.

RECORDING AND SHARING INFORMATION

- 29.1 We will record, store and share information under this policy in accordance with UK GDPR, the Data Protection Act 2018,, the Data (Use and Access) Act 2026, our Privacy Policy, privacy notices and retention procedures. Information will only be recorded or shared where it is necessary, relevant and proportionate. Records must be factual, accurate and limited to what is needed to evidence incidents, decisions, restrictions, reviews or actions taken.

Recording

- 29.2 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
- 29.3 This includes retaining relevant online evidence, such as screenshots.
- 29.4 Material stored as evidence may be distressing or sensitive. It must be stored securely so that it cannot be accidentally or unnecessarily accessed. Electronic files should be saved in restricted-access locations and clearly named to indicate where they contain distressing or sensitive material. Physical documents should be stored securely, for example in sealed envelopes or restricted-access files. Evidence must be retained only for as long as necessary in line with our retention schedule and securely deleted or destroyed when no longer required.
- 29.5 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.
- 29.6 Access to records and evidence under this policy will be restricted to staff who need the information to carry out their role, implement an agreed restriction, support staff

safety, manage a complaint or fulfil a legal, safeguarding or regulatory obligation. Information should not be shared more widely than necessary.

Sharing information

- 30.1 Where we share information with Police Scotland, regulators, local authorities, advocates, support agencies or legal advisers, sharing will be undertaken only where lawful, necessary and proportionate.
- 30.2 There is specific advice in the section on physical threats about sharing with other agencies. Internally, 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 noted 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.

Recording and sharing when staff named publicly (for example, online)

- 31.1 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.
- 31.2 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.
- 31.3 Action to support the member of staff may include an informal discussion and an offer of counselling.
- 31.4 Any instances of HHP staff being publicly named online will be recorded and kept confidentially by HHP. We may actively seek to have the person's name removed unless the risks 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.

CONNECTED POLICIES

32.1 This policy should be read in conjunction with the following policies:

- Comments, Compliments and Complaints
- Communications
- Particular Housing Needs
- Equality and Diversity
- Sexual Harassment

MONITORING AND REVIEW OF POLICY

33.1 This policy will be reviewed every 3 years.

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



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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