

Single Point of Contact and Advocacy Policy Policy/Strategy

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Policy/Strategy Control Statement

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Policy Applicable To

Business Area: Homes Plus

Applicable to: [Policy Applicable To]

Amendment Sheet Record

Revision Date	Description of Changes	Approved By	Date Approved

Please summarise the current policy requirements and how this is changed in the new policy.

To update on current practice

Please explain the reason for changes/improvements/new policy.

Progressive update

Please explain any new actions required to put the policy changes into practice.

Just updates to reflect practice

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1.0 Introduction

As an organisation we manage many contacts and communications each day

We recognise the barriers that some Customers may face when communicating with us. These may be physical, sensory, communication or language barriers, but can also include their anxieties and concerns. Customers may need support to overcome these barriers, and some may require advocacy to help them communicate with us.

A small number of people interact with the organisation in an unreasonable manner which makes it difficult for us to deliver our services. This can occur when a customer becomes angry or upset, and the circumstances will be considered when considering whether a single point of contact (SPOC) should be implemented.

In other circumstances a customer may choose to appoint an Advocate to support them with the management of their tenancy for either a long or short period of time. This could be an internal colleague as a Single Point of Contact, (SPOC) or Advocate if external.

We aim to have in place an effective, simple and accessible process to enable Customers and prospective Customers to nominate a representative to act on their behalf in interactions with us about our services, for example, to make a complaint or discuss progress of a repair or a housing application.

In circumstances where the Customers behaviour is unacceptable, we will take action to protect the wellbeing and safety of our colleagues. We have a Health and Safety legislative duty to do so, and abuse of colleagues will not be tolerated. Colleagues and our contractors must always be protected against any behaviour which has had a harmful or detrimental effect on them.

In these circumstances, those contacting us may also behave in a manner that could affect the service we provide to other Customers, have a detrimental effect on individual colleagues and / or damage our reputation. When this occurs, we reserve the right to manage contact with that individual through a SPOC to protect our colleagues and to maintain the effectiveness of our service to other Customers.

This policy sets out our approach to these issues and covers any Customer, individual or representative of any organisation who interacts with us. The Affordable Housing (AH) companies, recognise their duties under the Freedom of Information Act, the Data Protection Act, General Data Protection Regulation (GDPR) and related legislation, to provide data to requesters.

2.0 Scope of Policy

This policy applies to the following Affordable Housing companies:

- Living Plus
- Places for People Homes

This policy can be applied to any of the following categories:

- People living in our homes.
- Former Customers
- Customers' families, informal carers, and visitors
- Advocates/legal or lay representatives of Customers
- Prospective Customers or applicants for housing or services
- Any individual making derogatory, inflammatory, or untrue comments regarding our directors and/or colleagues in a public forum including on social media.

While 'colleagues' are referred to throughout this document, the policy applies to any person who is lawfully engaged in conducting any housing management function on behalf of the AH companies. This includes colleagues, managers, directors, and contractors who may be acting on our behalf.

3.0 Aims of the Policy

The aim of this policy is:

- To be open and transparent in how we interact with Customers, including those whose actions we consider unacceptable.
- To deal fairly, honestly, consistently, and appropriately with all Customers, recognising that all Customers have the right to be heard, understood, and respected.
- Define and explain unacceptable behaviour that will require a SPOC and outline the process colleagues will follow and the Customers rights.
- Enable Customers and Prospective Customers to nominate an internal or external representative to act on their behalf in interactions with us.
- To provide a service that is accessible to all Customers while retaining the right to restrict or change access to the service in cases of unacceptable behaviour.
- To ensure that Customers and colleagues do not suffer any disadvantage from individuals who act in an unreasonable manner.

4.0 Definition of Unacceptable Behaviour

Actions that are considered unacceptable can be grouped as follows:

- Unreasonable demands for example: requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another.
- Unreasonable persistence, for example refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any

new evidence, continuously adding to, or changing the subject matter of the complaint.

- Verbal abuse, aggression, violence - this is not just limited to actual physical or verbal abuse but can include derogatory remarks, rudeness, inflammatory allegations, and threats of violence.
- Overload of letters, calls, emails or contact via social media - this could include the frequency of contact as well as the volume of correspondence received and the frequency and length of telephone calls. All instances of unacceptable social or other media use must be reported through line managers to the communications team for advice.
- Inflammatory statements and unsubstantiated allegations regarding individual colleagues can be abusive behaviour and we will take legal action where appropriate.
- Treating colleagues in an abusive or threatening manner
- Refusing to respond to contact from colleagues, or blocking contact methods, which makes it difficult to investigate and resolve issues.
- Repeatedly contacting several colleagues about the same issue to deliberately cause confusion
- Repeatedly contacting senior members of staff directly when a colleague has been allocated as an agreed point of contact.

Violent, Aggressive, Threatening or Abusive Behaviour will be managed under the Unacceptable Behaviour Policy (UBP).

5.0 Unreasonable Behaviour

Behaviour of this type towards colleagues will be managed under the UBP and will result in a system flag and notes being added to the Customer's online file with an explanation of why the alert has been added.

A SPOC is not always required if an ongoing relationship can be maintained. If a SPOC is required, they will be the point of contact with the Customer other, than instances detailed in section 12.0. A SPOC alert will be added to our CRM system outlining alternative contact arrangements. The Customer will be contacted and advised why this decision has been reached and provided with contact arrangements.

We will end telephone calls if the caller displays aggressive or abusive behaviour. All colleagues have the right to make this decision, including the SPOC; they will tell the caller that the behaviour or language is unacceptable and end the call if the behaviour does not stop and we will retain any evidence of this type of behaviour on the Customer file for action under the UBP.

If this behaviour continues, we may insist that future contact to be through a third party and not allow any contact from or to the Customer. Action to terminate a tenancy may be considered under the UBP.

People may act out of character in times of trouble or distress. There may have been upsetting or distressing circumstances leading up to the interaction with the organisation. We do not view behaviour as unreasonable just because a customer is forceful or determined. The dictionary definition of unreasonable behaviour is - *“Actions that are beyond the limits of acceptability or fairness”*.

Colleagues should record any interaction of these natures on our CRM system and discuss with their line manager within 24 hours of the incident occurring. The line manager will discuss the case with Area Manager and a decision made on further action as detailed in section 16.0.

5.1 Vexatious Requests

This is when Customers act to cause unnecessary aggravation or annoyance rather than to resolve a dispute. Vexatious requests are likely to cause distress or disruption without a justified cause. Sometimes Customers are not aware of their vexatious behaviour. Examples of this type of behaviour include:

- Where the Customer states the request is meant to cause maximum inconvenience, disruption, or annoyance.
- Where the effect of repeated complaints or contact is to harass us
- Requests for information the Customer has already seen or clear intention to reopen issue that have already been considered.

In some instances, Customers pursue requests for information and complaints in a way that is unreasonable and examples of this type of behaviour include:

- Refusing to cooperate, including to specify the details of a complaint or issue, despite helping
- Denying or changing statements made at an earlier stage.
- Making unjustified or repetitive complaints about colleagues who are trying to deal with the issues and requesting to have them replaced or wanting to choose who they deal with
- Demanding responses within an unreasonable timescale
- Repeatedly contacting or insisting on speaking to a particular colleague who is not directly dealing with the matter.
- Excessive telephone calls, emails, or letters
- Entering the complaints process and continually adding more elements to a complaint making it impossible to draft a response
- Sending duplicate correspondence requiring a response to more than one colleague
- Persistent refusal to accept explanations or decisions and continuing to contact us without presenting new and relevant information.

What amounts to unreasonable requests depends on the circumstances surrounding the behaviour and the seriousness of the issues raised by the individual.

Individuals may make what is unreasonable demands on their landlord for example through:

- The amount of information they seek.
- The nature and scale of service they expect.
- The number of approaches they make.

We consider these demands as unacceptable and unreasonable if they start to impact on the work of the organisation or the delivery of service to other Customers.

5.2 Unreasonable Persistence Contact within the Complaints Policy

Colleagues will encourage and advise Customers to use existing arrangements, such as the complaints policy to settle disputes, where applicable. Unreasonable persistence and contact sometimes occurs following a final decision on a matter at the end of a process, or when a customer does not pursue the matter through the appropriate route but continues to raise it. This category covers:

- Failure to accept that we are unable to assist them further or provide a level of service other than that provided already.
- Persistence in disagreeing with action or decision taken.
- Contacting the office persistently about the same issue
- Excessive volume and duration of calls
- Continuous demands that we manage issues out with our control or jurisdiction.
- Persistent refusal to follow relevant procedures or routes to resolution.
- Unreasonable level of contact (emails and letters) impacting our ability to deal with the issues and affecting services given to others.
- Continuing to pursue an issue we consider resolved or closed without presenting any new information.
- Several contacts to multiple colleagues.
- Persistently contacting senior management when a colleague has been allocated as a point of liaison or we have communicated the matter is closed.

In such circumstances, the individual will be told that no future contact will be acknowledged, actions or discussions entered concerning that issue. The individual may also be advised to contact the Ombudsman Services if they have exhausted our complaints procedure. Unreasonable behaviour may be due to several factors affecting that individual. In view of this, we will be mindful when dealing with Customers whose behaviour may not necessarily be because of their complaint but more related to other factors.

Any known vulnerabilities should be considered when restrictions are being imposed and any support agencies engaged with that individual notified.

6.0 Customer request for an Advocate or SPOC

In some circumstances a customer may request an Advocate (external person) or SPOC (internal colleague) to support them in managing their tenancy. This may be for a short period of time or longer depending on the reasons why they need this support: Examples of this are:

- Extensive repairs or improvements to their home
- Experiencing mental health or other health issues that impact their ability to manage their tenancy.
- Require additional support to help them communicate effectively or carry out actions in relation to their tenancy.

The request for a SPOC or Advocate will be considered by the appropriate person and their manager and if agreed, managed in accordance with this policy. If the request is declined the Customer will be notified as detailed in section 10.0.

7.0 Signposting Support for our Customers

Some of our Customers who have demonstrated unacceptable behaviour may need further support to enable them to sustain their tenancy.

There may be many complex factors involved in the Customers' behaviour, and the option to signpost to a relevant external support agency should always be considered.

8.0 Alert

A SPOC or Advocate alert will be placed on the Customers file on our CRM system to notify colleagues that communication with the Customer should be via the SPOC, except for incidents as detailed in section 12.0. The Alert will be reviewed by the SPOC and their line manager as detailed in section 16.0.

9.0 Notification of SPOC or Advocate to the Customer

As soon as the decision is made to apply any 'Restriction' or assigning a SPOC/ Advocate the Customer should be made aware. Depending on the circumstance the Customer will be notified of:

- Confirmation of their Advocate or SPOC request.
- Confirmation of action we have taken to help manage their behaviour including.
- The nature of the alert, with detail of the support available and, threat, behaviour or incident that led to the alert.
- That their records will show the alert
- Who we may pass this information to
- When we will remove the alert or review the decision to continue with the alert.
- What they can do if they disagree with the decision

10.0 Types of Notifications

There are various ways we can notify a Customer of the SPOC alert depending on the circumstances. These are listed below:

Written - In most circumstances, a letter should be sent to the individual to notify them of the marker.

Verbal - Where we have identified Customers with sight impairment, a conversation explaining the Alert should take place and a file note saved to the Tenancy File detailing the conversation with the Customer on the tenancy file.

The individual's rights

The Data Protection Act gives individuals the right to make a subject access request to see their personal information. In most circumstances, we should reveal the fact that there is an alert flag on the Customer's records. In most cases we will have informed the individual that we have placed an alert on their record.

Requests to stop processing personal information.

Section 10 of the Data Protection Act gives individuals the right request we stop processing their personal information if this is likely to cause them substantial and unwarranted damage or distress. If an individual gives us a 'section 10 notice' relating to a violent warning marker, then we should be aware that we may have to justify creating the marker in court.

11.0 Decision making

The decision to formally restrict an individual's contact with the organisation will only be taken after careful consideration of the situation by an operations manager (or functional equivalent).

Wherever possible, the individual will be given the opportunity to modify their behaviour or actions before a decision is taken and as above, a warning letter will be sent where appropriate. However, in extreme cases our action may be taken without prior notice to that individual to protect colleagues where necessary.

If an individual persists with unreasonable behaviour or if the first instance of this behaviour is serious enough to warrant immediate restriction, the AH companies will:

- Arrange for a SPOC to deal with all future calls or correspondence from the individual. The restriction is on the Customer's contact and not on the landlord. Therefore, colleagues from different areas of the business can contact the individual in writing but the individual must channel their response via their point of contact as per the restriction. This approach will allow the various specialisms in the business to effectively communicate with the restricted individual so that service delivery is not affected.
- Limit future contact to a particular form and/or frequency - for example, emails or letters only - and these will be reviewed once per week/month.
- Block telephone calls and/or emails from being received unless there is a single point of contact with that individual.
- Block social media accounts.
- Inform the individual that their correspondence will be read to ensure no new issues have been raised, but then filed, without further acknowledgement or action.

In response to lengthy letters or emails, the SPOC will advise the Customer to clearly articulate and summarise their complaint so that the issues are clearly identified for us to be able to respond:

12.0 Circumstances where the SPOC will not be the first point of contact.

In the following circumstances the SPOC will not be the first point of contact. This is to ensure that the Customer received the appropriate service and in the correct timescale.

- Emergency repairs – i.e. leaks, electrical.
- Safeguarding referrals
- In the event the Customer requires an emergency temporary move
- Anti Social Behaviour cases - these will be managed by the Community Safety Manager

In these circumstances the SPOC should be notified via contact through our or CRM system, or a meetings or call, and they should be fully updated by the appropriate person on the details of the event.

13.0 Change of SPOC

A Customer request for a change of SPOC will only be considered in the following circumstances:

- There has been a substantiated complaint against the SPOC.

- The relationship between the Customer and the SPOC is irreconcilable and is inhibiting the ability to move matters forward.
- The relationship is having a detrimental impact on the SPOC's mental health and well being.

This will be decided as in section 14.0 however, support will be offered to the SPOC via their line manager, Employee Assistance Programme and Mental First Aiders.

14.0 Appealing SPOC allocation

An individual can appeal against a decision to restrict contact by putting their case in writing. The option to do this must be included in the letter stating the restriction to the individual.

Individuals will be asked to provide evidence of any disabilities that will prevent them from being able to communicate in line with the restriction placed on them i.e. unable to write. We will accept this in any format.

The appeal will be conducted by an operations manager (or equivalent) from a different area of the business to the requesting manager, to ensure the review is objective.

The reviewing manager should advise the individual in writing that either the restricted contact arrangements still apply, or that a different course of action has been agreed. This process should be conducted within twenty working days of the appeal request being received.

15.0 Breaches of Restriction

If an individual refuses to work with the SPOC, we may take any of the following actions, dependent on the extent and nature of the breach(es).

- Give a warning advising that further restrictions may be imposed.
- Impose further restrictions.
- Apply to court for an injunction (breaching an injunction will hold the individual in contempt of Court and can result in a fine or custodial sentence)
- Seek Possession of a property if behaviour is perpetrated by a customer or their visitors/associates.
- Involve the Police.

16.0 Reviewing

A review should be conducted between the SPOC and their line manager every 3 months to ensure that the arrangements are still required. Notes should be added to our CRM system to ensure that there is a full record of the review and outcome.

If a customer requests the SPOC, the review can be extended up to 12 months. One month before the expiry the SPOC should speak to the Customer and ask if the agreement is still required.

A review of the Customer Advocate will be reviewed at the Customers request or the 12-month point. One month before the expiry the CHM should speak to the Customer and ask if the Advocate is still required.

17.0 Further Advice

This policy has been produced to help colleagues effectively manage unreasonable behaviour by Customers or unreasonably demanding Customers. For further advice contact your Affordable Housing Company (see section 2.0).

Further advice and support can be found on the Group website on the following pages:

1. [Make a complaint: England - Places for People](#)
2. [Community Safety: England - Places for People](#)
3. [Accessibility - Places for People](#)