SCOTTISH PUBLIC SERVICES OMBUDSMAN
People Centred Improvement Focused

Agenda Item 7.1(iv)

Drumchapel Housing Co-operative Limited

Respectful Engagement Policy and Procedure

DRAFT

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Linked Policies	
Customer Service Standards	Dignity at Work Policy
Complaints Handling Procedure	Sexual Harassment Policy
Health and Safety Control Manual	

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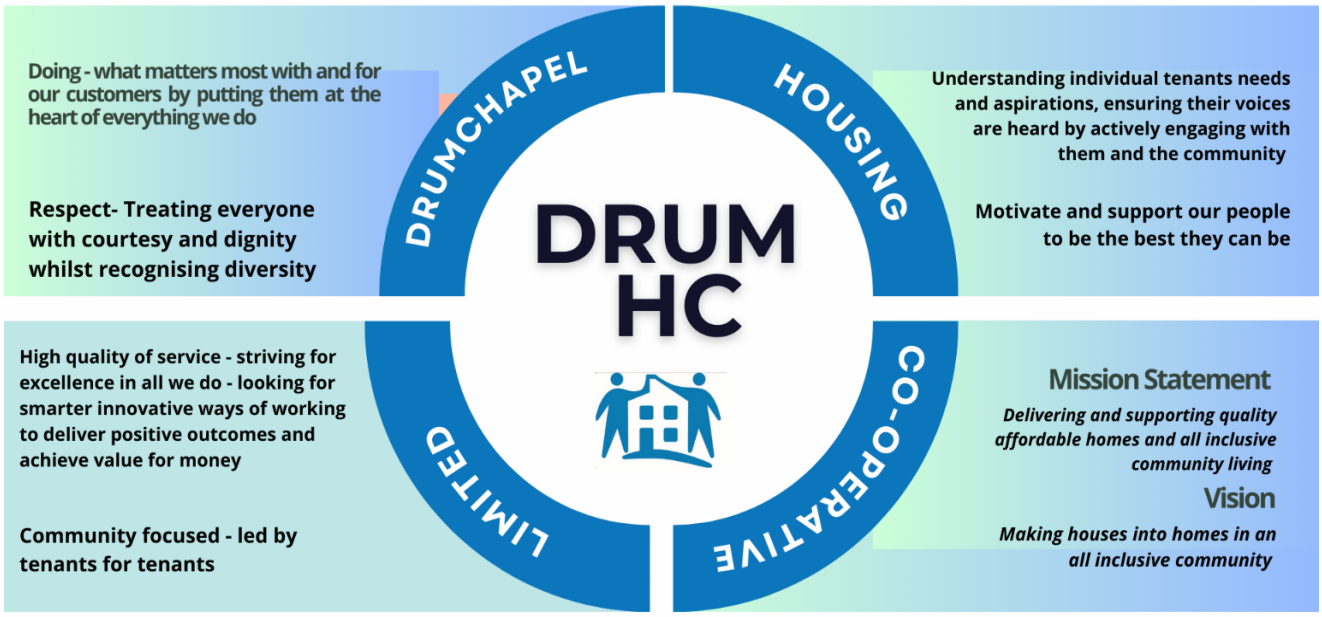
Vision and Values



Equality and Human Rights Statement

Drumchapel Housing Co-operative are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation. This document complies with our Equality and Human Rights Policy.

Accessibility

We are committed to ensuring our policies and documents are accessible to everyone. If you require this document in an alternative format, or need support to access its contents, please contact the office and reasonable adjustments will be made

Privacy Statement

Drumchapel Housing Co-operative's Data Protection Policy outlines how the organisation lawfully, fairly, and securely manages personal data in line with UK GDPR, the Data Protection Act 2018, the UK Data Use and Access Act 2025, and PECR. It sets out responsibilities for staff and management, requirements for accurate and minimal data collection, rules on data sharing and processor oversight, procedures for managing data breaches, and the rights of individuals over their personal information. The policy emphasises security, accountability, data protection by design, regular training, and ongoing monitoring to ensure continued compliance.

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1. Introduction

Drumchapel Housing Co-operative has customer service standards which reflect our commitment to offering a high-quality service and ensuring we treat everyone with dignity and respect. These standards outline the level of service people can expect from the Co-operative and reflect its commitment to delivering high-quality, customer-focused services.

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 on 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.

We have adopted this policy from Scottish Public Service Ombudsman guidance.

2. Aims of the Policy

This policy covers anyone who engages with Drumchapel Housing Co-operative including service users, stakeholders, advocates and elected representatives. Different processes may be appropriate for our work with individuals or organisations who provide services to us under contract, but the standards of engagement we support are the same for all.

Engagement includes all forms of contact including verbal (over the telephone, in person, etc.), written (letters, emails, online forms, etc.) as well as contact at Co-operative events, training sessions and online. Online comments about Drumchapel Housing Co-operative 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 us.

3. Supporting positive engagement

We support positive engagement and will let people know how they can engage positively with us. We will provide information about how they can access our service, request adjustments, and explain clearly what we need from them for us to provide the best possible service.

Supporting positive engagement includes supporting people to express concerns about our office and service in a constructive manner by ensuring:

- we apply our customer service standards fairly and openly when individual concerns are raised; and
- we provide information to help ensure concerns can be made about our service publicly without putting our staff or our need to investigate at risk.

3.1 Providing additional support

We understand that people who come to us may have experience of trauma or 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. We will seek to defuse and de-escalate situations. We regularly signpost to organisations who can provide independent advice and support.

3.2 Making reasonable adjustments to our service

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 for 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.

4. Our approach to managing engagement

While we will work to support positive engagement, there are some situations that we 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.

We will seek, whenever possible, to restore the relationship and to ensure we can provide a full service.

However, we do need to take action if the situation becomes unacceptable or is resulting in unreasonable demands on our office or unreasonable behaviour towards the Co-operative's staff and others.

When we need to manage engagement in this way, we will ensure responses are proportionate to the behaviour and the impact on the Co-operative 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.

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.

At all times, we will work to ensure our response is proportionate and necessary and uses the least restrictive method available.

The decision whether or not to take a management approach does not affect the right of any member of the Co-operative 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 criterion for further management is not met. There is more information on this in the supporting staff section below.

4.1 Restorative approaches, recovering the relationship

Where possible, we should seek to act in ways that recovers the relationship.

For example, staff may seek to defuse and de-escalate by suggesting breaks if conversations are becoming heated; intervene early before behaviour escalates; 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.

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 from professionals outside the organisation or third sector experts where we consider the person is vulnerable and restrictions would have a disproportionate impact.

4.2 Actively managing behaviour, delivering our service

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.

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

- restricting contact by channel (for example, telephone or email) or to a named person;
- not providing direct contact details or staff names (when there is a risk this will lead to harassment);
- communicating through a third party such as an advocate rather than direct contact;

- directing telephone calls to an automated service (when telephone contact is blocking others from accessing our service or is abusive); and

- restricting time / volume of contact.

To ensure consistency, a decision to actively manage a situation needs to be communicated and agreed by a manager. All such restrictions require to be supported by evidence and can be challenged by an appeal to a member of the senior team or the Ombudsman.

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 the restriction means that would not be appropriate (for example, if it is to protect staff from violence). The timing and circumstances where a review would be considered should be explained clearly to the person who is under restriction at the time the restriction is put in place.

4.3 Protecting our staff and others

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

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 happen and should always raise with a 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.

4.4 Telephone or face to face contact

During telephone 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.

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. Recording is acceptable for personal use and we can support that, but only limited staff are able to speak publicly on behalf of the organisation. As noted below, depending on the surrounding circumstances, this could also come under the category of harassment.

4.5 Written or email correspondence to the Co-operative

If we receive violent or abusive correspondence, the sender should be informed this is unacceptable. This could be done by a manager or from the enquiries email account that is not linked to an individual if this has been aimed at an individual staff member.

We should not respond directly to the correspondence. In some cases, particularly if there is an indication of a risk to health or safety or a public interest, we may use evidence that is supplied with the correspondence as part of our investigation but that should not be the default position. See below for specific advice on how to store any abusive correspondence that may need to be kept for evidential purposes.

The decision that correspondence is unacceptable should be carefully considered and communicated to a manager to ensure consistency. Where this behaviour is repeated despite warnings or an individual instance is regarded as at the higher end of abuse, we may need to take steps to restrict methods of contact with the office.

4.6 Online, web and social media

This is a fast-moving and changing area; nevertheless, the principles outlined in this policy will still apply. The Co-operative 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;
- 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; and
- direct threats on social media should be dealt with like any physical threat (see below).

4.7 Physical threats

When a physical threat is made, we will normally report it to the police. This includes situations when the threat made is not to us but a threat to harm a third party.

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 not to inform the police alone. It should be made by a member of the leadership team who should clearly record the decision. The

leadership team member should consider 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.

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.

5. Identifying types of engagement, we need to manage

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. 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.

5.1 Violence

Violence towards staff or others will not be accepted

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 would reasonably cause someone to feel offended, afraid or threatened.

5.2 Abuse

Abuse of staff or others will not be accepted

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.

Language which makes unfounded allegations about an individual's professional ability or capability or seeks to belittle or denigrate them personally is also unacceptable.

Violent or abusive comments sent to the Co-operative 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.

Comments made about the Co-operative or our 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.

5.3 Harassment

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; and / or
- targeting and naming staff on public or other easily shared social media.

5.4 Sexual Harassment

Sexual Harassment of any form is unacceptable, and our Dignity at Work Policy outlines the actions which will be taken. 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.
All instances of sexual harassment must be communicated immediately to a manager.

5.5 Contact outside the office

Any contact with a complainant 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 places. 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 apparent at the point of allocation are picked up (for example, where there is significant social overlap).

However, it also helps to quickly identify any pattern of the complainant seeking direct contact in an inappropriate manner.

5.6 Naming and targeting staff publicly

We encourage those who wish to criticise the Co-operative online to name the office rather than individuals. We will inform them of the reasons why our investigations are in private – i.e. to protect them, but also to protect our staff and the investigative process. We will make it clear that our staff are acting with the delegated authority, and the office can be named. Naming of individuals online may lead to restrictions being put in place.

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. We support and can assist in providing recordings for personal use as a reasonable adjustment.

5.7 Demands on our office

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 customers and prevents us from providing a service to the person making the demands within a reasonable timescale.

Examples of actions grouped under this heading include:

- repeatedly demanding responses within an unreasonable timescale;
- insisting on seeing or speaking to a particular member of staff when that is not possible; and
- repeatedly changing the substance of their issue or raising unrelated concerns.

5.8 Levels of contact

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 a complaint 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 issues.

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

5.9 Refusal to co-operate

We want people to work with us. This can include agreeing with us about 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.

Repeated refusal to co-operate makes it difficult for us to proceed. 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 a matter to us, or ask us to provide a service, and then not respond to reasonable requests.

5.10 Use of the complaint processes

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 a complaints system to be important, and it will only be in exceptional circumstances that we would consider such repeated use is unacceptable, but we reserve the right to do so in such cases. Such decisions can be made by a manager and will be communicated with a member of the leadership team.

6. Supporting staff

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

6.1 Empowering staff to end contact they find distressing

All staff have the authority to end any engagement or interaction which they find personally distressing or difficult at the 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 the Co-operative's social media.

When this occurs, they should take a note and discuss with their line (or, if not available, other) manager as soon as possible.

6.2 Supporting staff

When a zero tolerance 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 no longer have contact with a specific individual.

The Co-operative has a number of policies in place to support the wellbeing of staff and have access to a confidential support line (Rowan). Staff who experience an incident should be reminded of these options and supported to access them if they wish.

6.3 Requesting removal from direct contact or from a customer

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 issue 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.

7. Approach to communicating decisions

We provide guidance and support to staff to help them meet our standards to communicate with respect. We have developed a guide for staff that deals specifically with difficult situations. 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 public bodies 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.

8. Recording and sharing information

8.1 Recording

It is important that we keep a clear record on our Housing Management System whenever we have had to:

- actively work to restore a relationship to avoid restrictions;
- put restrictions in place; and
- take a zero tolerance approach.

This should include storing any online evidence such as screen shots.

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.

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.

8.2 Sharing information

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 telephone contact, all staff who receive calls should be informed; and
- for emails, we should ensure this information is shared with people who monitor online and other web contact.

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

If you find that a staff member of the Co-operative has been publicly named in relation to their duties, the following step should be taken:

An email should be sent to the member of staff's line manager, the Finance and Corporate Services Manager, and in their absence to the Director. 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. The member of staff's line manager (or in their absence the FCSM or Director) will inform the member of staff in private of the content of the material. The affected member of staff will have a say in what, if any, action is taken in response. Action to support the member of staff may include an informal discussion and an offer of counselling support through the Rowan Employee Assistance service.

Any instances of Co-operative staff being publicly named online will be recorded and kept confidentially by the FCSM. We may actively seek to have the person’s name

removed unless the risk that would escalate the situation are felt to be significant. The incident will be shared with the Leadership team. It is for the affected individual and FCSM to determine whether a record is made in the staff member's personal records.

9. Policy Review

This policy will be reviewed in accordance with good practice or within 3 years of approval.

Drumchapel Housing Co-operative **Equality Impact Assessment**			
Name of the **policy/ proposal** to be assessed	Respectful Engagement Policy	Is this a **new policy/proposal or a revision**?	NEW
Person(s) responsible for the assessment	Sharon Flynn		
Our policy has taken account of Article 6 of the Human Rights Act	This article highlights that “People have the right to a fair trial.” The Co-operative will therefore ensure it makes reasonable adjustments to how they communicate with tenants, and others, when developing policies/delivering services which could result in legal action being taken. In particular, the Co-operative will seek to reduce barriers tenants, and other customers, from specific groups might encounter if they are subject to legal action (i.e. ensuring someone with ‘additional support needs’ understands the legal processes and/or the Co-operative work through any third parties or mediators that person works with, if legal action is initiated to someone with English as a second language the Co-operative will ensure they are provided with access to appropriate translation support, etc.). In addition, if someone was appealing against an allocation decision, required access to additional support (i.e. access to translators, assistance with completing forms, signposting to support groups, etc.) then the Co-operative would provide all reasonable assistance.		
Our policy has taken account of Article 8 of the Human Rights Act	This Article highlights people’s “Right to respect for private life, family life and the home.” The Co-operative will seek to ensure policies deal effectively with anti-social issues, noise pollution,		

	neighbour disputes, etc., and policies will avoid exacerbating any issues.
Our policy has taken account of Article 14 of the Human Rights Act	This article highlights the “Prohibition of Discrimination” in any areas of the Co-operative’s work. The Co-operative will seek to ensure its policies and decisions are based on the merits of each case and nothing to do with a protected characteristic. The only exception would be a policy / service designed to help a particular group i.e. sheltered housing, caretaker service (designed particularly to benefit the elderly and disabled).

1. Briefly describe the **aims, objectives and purpose** of the policy/proposal	
2. Who is intended to benefit from the policy/ proposal? *(e.g. applicants, tenants, staff, contractors)*	
3. What **outcomes** are **wanted** from this policy/ proposal? *(e.g. the benefits to customers)*	

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

☒ Age ☒ Disability ☐ Marriage & Civil Partnership ☐ Pregnancy/Maternity

☒ Race ☐ Religion or Belief ☒ Sex/Gender ☒ Gender Reassignment

☒ Sexual Orientation

5. If the policy/proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

	Positive impact(s)	**Negative impact(s)**
6. Describe the **likely positive or negative impact(s)** the policy/proposal could have on the groups identified in part 4.		
7. What **actions** are **required** to address the impacts arising from this assessment? *(This might include; collecting additional data, monitoring in place, specific actions to mitigate negative impacts).*		

Signed: Sharon Flynn (Job title): Consultant

Date the Equality Impact Assessment was carried out: 15 September 2026