

# **Expected Behaviour Procedure**

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**Document governance and management**

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# 1. Introduction

Recognition and respect for others is one of our organisational values.

Very occasionally customer behaviour makes it difficult for us to deliver our service effectively or presents a risk to staff. This procedure sets out the standards of behaviour we expect from those we interact with and what we will do if behaviour does not meet the expected standards.

For this procedure, a “customer” is anyone who engages with the SSSC including registered workers, employers, stakeholders or members of the public. The standard of behaviour we expect is the same for all customer groups.

Engagement includes all forms of contact including contact by telephone, email, letter, in person or through online forms.

Staff members who handle calls from customers are trained in handling difficult conversations, and are encouraged to proactively offer support and/or reasonable adjustments where it is apparent that a customer is struggling to communicate. The Expected Behaviour Procedure will only be applied when all attempts to communicate with and support the customer have been exhausted.

The procedure is focused on expected customer behaviour, expected staff behaviour is set out in our [code of conduct](#).

## 2. Principles

### 2.1 We expect:

- our staff to behave in a way that is consistent with our organisational values and [code of conduct](#), by being professional and treating customers with courtesy, respect and dignity
- our customers to treat staff with courtesy and respect.

### 2.2 We will:

- recognise customers can act out of character in times of trouble or distress
- recognise that customers may need additional support in communicating with us which can lead to frustration or distress. We can make reasonable adjustments or accept communications from a representative or an advocate where a customer tells us they need help to engage with us – you can find more information about this under [Getting help to contact the SSSC](#)
- follow our [complaints handling procedure](#) when customers express dissatisfaction
- protect the health and wellbeing of our staff from unacceptable behaviour such as unreasonable persistence, threats or offensive behaviour
- apply this policy proportionately ensuring customers can make legitimate service requests.

## 2.3 What is unacceptable behaviour?

We consider the following to be unacceptable:

- aggressive or abusive behaviour
- unreasonable levels of contact
- unreasonable demands
- unreasonable use of technology.

We do not view behaviour as unacceptable just because a customer is forceful or determined. What we consider unacceptable will depend on the circumstances and seriousness of the issues raised and we will take a common sense approach.

The following examples are not exhaustive.

### **Aggressive or abusive behaviour:**

- threats
- physical violence
- verbal abuse, derogatory remarks and discriminatory language
- rudeness
- inflammatory statements
- unsubstantiated allegations.

### **Unreasonable levels of contact:**

- contacting us repeatedly about:
  - the same issue before we have had an opportunity to deal with the initial request
  - the same issue when we have provided a response
  - a subject being handled as part of another process
- contacting us repeatedly to challenge a decision or ask for more information about a process that has concluded – for example a complaint investigation or fitness to practise decision
- continuing to pursue an issue without presenting new information (unless the action is within the terms of our internal review processes).

Contact can be by phone, writing, digital platform or in person.

### **Unreasonable demands:**

- seeking excessive amounts of information
- seeking a service beyond our remit or published service level
- making an excessive number of approaches to the SSSC
- repeatedly changing the subject of the request or raising unrelated issues
- asking for responses within an unreasonable timescale
- insisting on being dealt with by a particular member of staff
- behaviour which is designed to cause disruption to our service
- behaviour which takes up disproportionate time or resource
- behaviour which has the effect of harassing or intimidating our staff.

**Unreasonable use of technology:**

- recording staff without consent
- sharing recordings or transcripts of recordings on digital platforms without consent.

## **3. Roles and responsibilities**

### **3.1 Executive Management Team (EMT)**

Our EMT is responsible for:

- approving this policy
- monitoring the implementation of the policy.

Individual EMT members are responsible for:

- reviewing customer appeals.

### **3.2 Operational Management Team (OMT)**

Our OMT is responsible for:

- monitoring the implementation of the policy
- ensuring staff awareness of this policy.

Individual OMT members are responsible for:

- decisions to restrict customer contact
- informing customers where we will be applying the Expected Behaviour Policy and making restrictions to contact
- reviewing decisions regularly
- reviewing customer appeals.

### **3.3 Staff members**

All staff members have a right to carry out their work free from any forms of unacceptable behaviour as outlined in section two.

Staff members are responsible for:

- providing the highest standard of customer service to all customers
- proactively offering support or reasonable adjustments to customers where it becomes apparent they are struggling to communicate
- making referrals to a manager where a customer is behaving in an unacceptable manner as outlined in section two.

## 4. Managing unacceptable behaviour

### 4.1 Significant incidents

Staff are authorised to end a customer interaction if they feel threatened or intimidated. Staff have the discretion to decide how best to handle the situation safely, they may:

- give notice that they will end the contact if the behaviour does not stop
- end the contact immediately explaining the behaviour is unacceptable
- end the contact without explaining why.

All incidents must be recorded on [Health & Safety Incident Reporting Forms](#) following the [guidance for completing guidance of for completing and incident or near miss](#).

### 4.2 Persistent behaviour

Where customer behaviour may be becoming unacceptable, staff will discuss the behaviour with a manager and agree an approach. A referral will then be made to a member of OMT to make the final decision on what, if any, measures should be put in place to manage contact with the customer.

We will raise our concerns with the customer as early as possible – taking into account the circumstances of the situation..

### 4.3 What we will do to manage unacceptable behaviour

Where a customer's behaviour is unacceptable, we may take one or a combination of the following measures:

- restrictions to contact such as:
  - contact limits – such as frequency or time of contacts
  - contact through specified channels only – for example in writing or phone only
  - contact with specified SSSC staff only
  - contact through a third party
  - limiting contact on certain subjects – we may consider and record the contact if appropriate, but only acknowledge if the contact includes significant new information on the subject.
- ending all customer contact
- reporting criminal behaviour, such as physical violence or threats of violence to the Police.

We may take other action we consider appropriate to the circumstances. All measures we put in place will be proportionate and always at the lowest reasonable level to make sure customers can continue to access our services and our staff are protected.

We will try to maintain at least one form of contact where possible.

Where appropriate we will give customers an opportunity to remedy behaviour, by telling them what behaviour we consider unacceptable before we restrict contact.

We have **zero tolerance** of threats, violence and abusive behaviour towards staff. Restrictions will be applied immediately if an incident is very serious.

## 4.4 Support available to staff

If staff are exposed to unacceptable behaviour, we will support them by providing supportive line management. This may include suggesting they access our Employee Assistance Programme or Mental Health First Aiders and where appropriate specialist advice through Human Resources. Line managers should remind staff that they have a right to be treated with courtesy and respect, and we do not expect staff to experience unacceptable behaviour as part of their job.

# 5. How we will apply the Expected Behaviour Procedure

## 5.1 Reviewing the measures we take

We will review restrictions placed on customers regularly. We will set a review date when restrictions are applied; this date should be no longer than twelve months.

## 5.2 Communicating with the customer

We will tell customers what action we are taking and why unless we consider that doing so presents greater risk to our staff or the customer. Where we do tell them, we will explain when the restrictions will be reviewed.

We will ensure communication is accessible, inclusive and meets the needs of the customer. We will provide communication in the customer's preferred format in cases where they have requested reasonable adjustments. For more information on how to request reasonable adjustments, see [Getting help to contact the SSSC](#).

## 5.3 Keeping records

We will record all:

- customer contacts
- unacceptable behaviour incidents
- decisions to restrict contact - alongside the details of the incident(s)
- review of decisions.

All relevant staff will have access to the decision to restrict contact on the customer record.



## 5.4 Authority to restrict contact

OMT members have authority to restrict customer contact.

## 5.5 Right of appeal

A customer can appeal a decision to restrict contact within 28 days of being notified.

An OMT or EMT member not involved in the original decision will review the decision. They will explain the outcome of their review to the customer.

## 5.6 Reporting

We will report and monitor the restrictions we place on customer contact as part of our complaints reporting.

# 6. Other guidance and documents

Our Expected Behaviour Procedure has been developed in line with [The Scottish Public Services Ombudsman \(SPSO\) guidance on handling unacceptable actions](#).

# 7. Getting help to contact the SSSC

We recognise that some of our customers may be unable or reluctant to contact us themselves, which can lead to frustrations. We accept communications from a representative for the customer, such as a friend, relative, or an advocate, if you have given them your consent to contact us for you.

You can find out about advocates in your area by contacting the [Scottish Independent Advocacy Alliance](#), 0131 510 9410.

You can also find out about advisers in your area through [Citizens Advice Scotland](#).

We are committed to making our service easy to use for all members of the community. In line with our statutory equalities duties, we will always make sure that reasonable adjustments are made to help you access and use our services. If you have trouble putting your complaint in writing, or want this information in another language or format, such as large font or Braille, please tell us in person or contact us. BSL users can contact us via contactSCOTLAND-BSL, the online British Sign Language interpreting service. Find out more on the [contact SCOTLAND website](#).

### Our contact details

Our address is:

Scottish Social Services Council

Compass House  
11 Riverside Drive  
Dundee  
DD1 4NY

You can call us on 0345 60 30 891.

You can email us directly at [registration@sssc.uk.com](mailto:registration@sssc.uk.com) or [complaints@sssc.uk.com](mailto:complaints@sssc.uk.com).



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DD1 4NY

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