

Cautionary Contacts Policy

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Prepared by	Head of Housing Services
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Monitoring, Auditing and Reporting	1. Regular review of cautionary contact alert status

1. Scope and Aims

- 1.1. This policy aims to increase the safety of Hexagon staff and contractors by identifying residents, their household members and visitors who may pose a risk.
- 1.2. Any cautionary contact will be identified with use of an alert on Hexagon's housing management database (CX). Officers will be responsible for checking the presence of a cautionary contact status before contacting any resident, particularly if this involves a visit to their home. Information regarding the cautionary contact status of households will also be shared with contractors on a regular basis.
- 1.3. The cautionary contact status will refer to specific households that may pose a risk due to certain behaviours, either because of information received or due to a specific incident taking place.
- 1.4. Cautionary contacts may also refer to households, or a location, where there are known risks that do not directly relate to identified behaviours of the resident or household member.
- 1.5. This policy relates to all tenures managed by Hexagon Housing Association (Hexagon). This includes tenants and leaseholders, their family members, friends, visitors and any lodgers or sub tenants.
- 1.6. We seek to ensure that there is an open and transparent process for the introduction, handling and review of a cautionary contact status.
- 1.7. We will set out how we decide when a resident, or address, becomes a cautionary contact and how the information is provided to the resident.

2. Equality and Diversity

- 2.1. Hexagon aims to understand the diverse needs of residents and deliver fair and equitable outcomes under this policy. We commit to considering reasonable adjustments in the delivery of our services to accommodate the diverse needs of residents and their household members.
- 2.2. An equality and diversity impact assessment has been carried out and is attached as an appendix to this Policy.
- 2.3. This Policy will be enacted in line with our Vulnerable Residents and Reasonable Adjustments Policy and in compliance with our obligations under the Equality Act 2010 and the Regulator of Social Housing's Consumer Regulations.

3. Resident Consultation

- 3.1. This policy is not on our programme for resident consultation, however if involved residents request consultation on this policy this will be facilitated by Hexagon.

4. Defining Cautionary Contact Status

- 4.1. Some households pose a potential threat to staff, not because of unacceptable behaviour, but due to circumstances. For example, a household may have animals that have previously displayed aggressive behaviour. This falls within the scope of this policy.
- 4.2. We will have due regard to the personal and household circumstances including any known vulnerabilities when deciding on adding a cautionary contact alert. This may lead to us taking a different approach to how we manage the decision e.g. making a safeguarding referral, communicating the decision differently.
- 4.3. Abuse, harassment including sexual harassment, threats of violence and actual violence towards staff or anyone acting on Hexagon's behalf is not acceptable, regardless of the circumstances. Where there is the need to escalate any incident to the police, we will co-operate fully with their enquiries.
- 4.4. We may need to take enforcement action against those who breach their tenancy agreements due to unacceptable behaviour. We will therefore make use of other relevant policies, such as the Anti-social Behaviour and Managing Unacceptable Behaviour Policies, as appropriate. Examples of behaviours that could lead to the household having a cautionary contact alert added to CX include, but are not limited to:
- 4.4.1. A single high-risk incident of aggressive, violent, or threatening behaviour from the resident (or other household member) towards a member of their household or visitor, a member of the public, a member of staff or a contractor.
- 4.4.2. Behaviour can be over the phone, via email, letter, social media or in person. It may include excessive swearing, shouting, intimidation, threats, inappropriate use of language as well as physical threats.
- 4.4.3. Repeated incidents of aggressive, violent, or threatening behaviour from the resident (or other household member/visitor to the address) towards a member of their household or visitor, a member of the public, a member of staff or a contractor.

- 4.4.4. Where there is evidence of a dangerous animal at the household or regularly visiting the household.
- 4.4.5. A household where there are hazards, such as drug paraphernalia.
- 4.4.6. Incidents that are reported to us via another agency, such as the Police or Local Authority that present cause for caution.
- 4.4.7. Information received from other agencies such as Police, the Local Authority or Social Services regarding concerns over the behaviour of the resident towards their staff.

5. Identifying and Recording Cautionary Contact Status

- 5.1. When an alert is added to CX, a note will also be added, detailing the incident or incidents that led to the inclusion of the alert.
- 5.2. It is important that details added to CX only relate to facts about the incident(s). No personal judgements or history of irrelevant information should be included.
- 5.3. Following the decision to add an alert to CX, we will write to the tenant or leaseholder, explaining the reason for giving the cautionary contact status and how long this will be in place. An opportunity to appeal the decision will also be given.
- 5.4. There may be exceptional cases where we do not notify the resident that they have been placed under the cautionary contact. This would be to avoid distress to the resident or to avoid escalating a certain situation.
- 5.5. When a decision is reached not to notify a resident of a cautionary contact alert, Hexagon reserves the right to withhold information regarding the alert in response to a Data Subject Access Request (DSAR). However, when responding to the DSAR request, reference must be made to the exemption under the UK GDPR legal basis for withholding such information.
- 5.6. Those who have a cautionary contact alert on CX prior to the implementation of this policy, will not be contacted regarding their inclusion/removal of the alert.
- 5.7. Along with the alert, the most appropriate course of action for ensuring that a service can continue to be delivered will be added. Examples of these include, but are not limited to:
 - 5.7.1. Visit in pairs only.
 - 5.7.2. No female officer/operatives to attend.

- 5.7.3. No male officer/operatives to attend.
- 5.8. Most cautionary contact alerts will be put in place for 12 months. However, there may be occasions when we may choose to add the alert for a shorter period if we believe the risk will be removed sooner.
- 5.9. A review of alerts on CX will be carried out ahead of their expiry to establish if they should be renewed or removed. The review will look at any incidents that have taken place within the 12 months since the status was instated.
- 5.10. A cautionary contact alert will be removed after the initial 12 months if we believe there is no longer a risk to staff.
- 5.11. We will update the customer on the outcome of their cautionary contact status review.

6. Related Hexagon policies, strategies and procedures

- 6.1. Anti-social Behaviour Policy and Procedure
- 6.2. Managing Unacceptable Behaviour from Complainants Policy
- 6.3. Pet Policy
- 6.4. Safeguarding Policy and Procedure
- 6.5. Vulnerable Residents and Reasonable Adjustments Policy
- 6.6. Personal Safety Policy
- 6.7. Lone Worker Policy

Appendix 1: Equality Impact Assessment

This assessment is completed in compliance with the Equality Act 2010, the Housing Regulator's Transparency, Influence and Accountability Consumer Standard, and Hexagon's Vulnerable Residents and Reasonable Adjustments Policy. Hexagon's Vulnerable Residents and Reasonable Adjustments Policy commits the organisation to understanding the diverse needs of residents and, where there are any barriers to accessing the service or any disproportionate negative impact, considering reasonable adjustments to ensure a fair and equitable outcome for all residents.

Hexagon recognises that responding and reacting to the changing needs of residents requires a willingness to do things differently and find individual solutions to ensure equitable access to our services for all. The following table will propose how we will adjust the service to account for possible requirements of different groups, to help us to prepare for these expected needs. However, we recognise that we cannot anticipate every need and that there is not a one-size-fits-all solution to all needs, so we will continue to be responsive and flexible in adapting to the diverse needs of residents in enacting this policy.

See the Vulnerable Residents and Reasonable Adjustments Policy for examples of Reasonable Adjustments we will consider. When considering what is reasonable, we will take into account: The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person with a disability; The practicality of us making the adjustments; The availability of our resources, including external assistance and finance; Any disruption to the service that making the adjustment may cause.

Characteristic	Impact	Explanation of Impact	Reasonable Adjustments Considered	Consideration of effectiveness, practicality, cost/availability of resources and any disruption to service	Decision on whether to implement the Reasonable Adjustment
Age	None	No impact identified			
Pregnancy/ Maternity	None	No impact identified			
Disability: Physical health and mobility	None	No impact identified			

Disability: Learning and neurodiversity	None	No impact identified			
Disability: Vision and hearing	None	No impact identified			
Disability: Mental health	Positive	Residents with mental health diagnoses may be more likely to require a cautionary contact alert, this policy ensures that this is applied fairly, communicated to the resident where possible, with an appeals process available, and a review process in place.	Liaising with a support worker about the decision with the resident's consent	No issues	Agreed
Sex	None	No impact identified			
Gender reassignment / Transgender / Non-binary identity	None	No impact identified			
Race or nationality	None	No impact identified			
Religion or belief	None	No impact identified			
Sexual orientation	None	No impact identified			

Language	None	No impact identified, however residents with no or little English Language proficiency may require translation services to understand the information given under this policy.	Translation of letters issued under this policy on the request of the resident. Hexagon to provide a translator for conversations about cautionary contact status on the request of the resident.	Cost and time implications to providing translations.	Agreed
Literacy	None	No impact identified, however residents with no or little literacy may need support where information is given in writing, i.e. letters.	Hexagon will communicate by the residents requested communication method, e.g. phone calls, or emails rather than letters so that a screen reader can be used.	No issues	Agreed

Equality Impact Assessment Outcome

Where any negative impact is identified, have changes to the policy or sufficient reasonable adjustments been proposed to mitigate the impact?
No negative impact identified. Where a protected group may be disproportionately represented in actions taken under this policy, this policy ensures a fair and consistent approach, with an appeals process, reasonable adjustments, due consideration of support needs, transparent communication, and a review process.
How will the reasonable adjustments be facilitated?
Reasonable adjustments will be clearly recorded on Hexagon's CRM to ensure all staff adhere to the adjustment, including communication needs. Staff will follow the Reasonable Adjustments Procedure, including working with partners to provide translation services.

What are the arrangements for monitoring and reporting on the impact on residents, the diverse needs of residents using the service, and the implementation of reasonable adjustments?

Most cautionary contact alerts will be put in place for 12 months. However, there may be occasions when we may choose to add the alert for a shorter period if we believe the risk will be removed sooner. A review of alerts on CX will be carried out ahead of their expiry to establish if they should be renewed or removed. The review will look at any incidents that have taken place within the 12 months since the status was instated. A cautionary contact alert will be removed after the initial 12 months if we believe there is no longer a risk to staff. We will update the customer on the outcome of their cautionary contact status review.

This policy will be reviewed every 3 years. We will conduct a review of the residents who have been issued cautionary contact status over the period and identify if any protected group has been disproportionately represented.

Are you satisfied that we have met our duties under the Equality Act 2010 and the Consumer Regulations?

☒ Yes

☐ No

Name and Job Role:

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