



Approved Housing Bodies Regulatory Authority

[Unreasonable Contact Policy]

[Policy Reference: AHBRA- UC-001]

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Responsible Officer	Antonia Smyth
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1. Introduction

As a public sector body, AHBRA must comply with not just the generally accepted standards of good customer service, but also those associated with its role as a publicly funded organisation.

AHBRA operates in a complex sector, that ranges significantly in size, scale, funding and delivery models. The AHB sector works with several regulators, funders, and oversight agencies. Consequently, AHBRA's stakeholders include government departments, local authorities, advocacy organisations, state funders, private funders, tenants, public bodies, and other regulators.

AHBRA is committed to providing all stakeholders with services in accordance with the twelve Principles of Quality Customer Service for Customers and Clients of Public Service: <https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/policy-information/guiding-principles-of-quality-customer-service/>.

The mechanisms for contact and feedback for our service users/stakeholders are set out in our Customer Charter on the AHBRA website: <https://www.ahbregulator.ie/legal-compliance/ahbra-customer-charter/>

2. Policy Purpose

The majority of people who contact AHBRA will engage with us in an appropriate and reasonable manner.

AHBRA understands that people may be contacting us because they are experiencing stress or frustration and we do our utmost to understand and deal compassionately with this.

AHBRA always aims to ensure that anyone who interacts with us is treated with courtesy and respect. In return, we expect anyone who engages with us to treat our staff fairly.

However, we cannot tolerate behaviour, which is abusive, offensive, threatening or, due to the frequency of contact, accounts for a disproportionate use of time and resources that could be spent more effectively dealing with other issues or other members of the public.

The following sets out the types of behaviour that we consider unreasonable and the actions that can be taken by AHBRA staff members as a result.

The steps are based on the Office of the Ombudsman's Reasonable Conduct Policy which is available here: <https://ombudsman.ie/en/collection/7569c-customer-service/#reasonable-engagement-policy>

3. Policy Scope

This policy applies to all types of engagement between AHBRA staff or its representatives and AHBRA service users/stakeholders. Engagement includes phone calls, emails and face to face interactions.

4. What is considered unreasonable contact

Behaviour is classified as unreasonable if it comprises:

Unreasonable behaviour

Examples of unreasonable behaviour include threatening violence, abusing staff, rude or aggressive conduct or threatening self-harm.

Also included is unauthorised recording of conversations with AHBRA staff and their broadcast or publication without express permission.

Unreasonable persistence

Examples of unreasonable persistence include persisting with an issue which has already been considered and closed.

Also included is ongoing or continuous expectation of an outcome or approach that is unrealistic or disproportionate. For example, demanding we consider an issue which is outside of our remit.

Persistence can manifest in different ways; for example, insisting that the issue be looked at again, re-framing it so as to present it as a new issue, persevering with an argument that has earlier been addressed or making contact numerous times over a short period of time, through one or more channels.

Unreasonable lack of co-operation

Examples of unreasonable lack of co-operation include not identifying the issue clearly, not providing details in writing when requested, sending large volumes of potentially unnecessary material and expecting an immediate response.

It also includes altering the nature of an issue midway through a consideration process or dishonesty in relation to facts.

Unreasonable arguments

Examples of unreasonable arguments include exaggerating issues, presenting irrelevant or unreasonable arguments.

It also includes insisting that a version of events be accepted as fact where there is no objective evidence to support this view.

5. How AHBRA manages unreasonable behaviour

When we consider that a person's behaviour is unreasonable, we will tell them and ask them to change their behaviour.

If the unreasonable behaviour continues, we will take steps to restrict that person's interaction with us.

A decision to restrict access will only be taken after we have reviewed, in consultation with the CEO, the interactions which have taken place.

Any restrictions imposed will be appropriate and proportionate. The options we are likely to consider are:

- Requesting that contact be made only in a particular form (letter or email)
- Requiring that contact takes place with a named member of staff only
- Restricting access to our offices or other communications channels
- Asking the person to enter into an agreement about their future conduct
- Terminating all contact if the unreasonable behaviour does not stop (this decision will be taken following a review by the CEO)

Regardless of an individual's behaviour, we will act respectfully at all times.

6. Approval and Review

This document will be reviewed every 2 years or sooner if required.

Issue Date	Issue	Author	Approver	Reason for Change
17 12 2025	V.1	Regulatory Leader	CEO	Initial Draft