MANAGEMENT OF UNACCEPTABLE BEHAVIOUR POLICY AND PROCEDURE

Harrow Health CIC Ground Floor Metro House 203 Pinner Road, Northwood, Middlesex HA6 1BX.

Last Reviewed	8 September 2026
Next Review	8 September 2027
Approved by	Harrow Health CIC Board
Review Interval	Annually
Impact	Low
Reason for this Review	Scheduled review
Changes Made	Yes
Summary	This policy provides guidance on zero tolerance in the service. It has been updated with a minor update to section 5.8 relating to who to send written notice of removal. Underpinning Knowledge and Further Reading links have also been checked and updated
Relevant Legislation	Equality Act 2010 Health and Safety at Work etc. Act 1974 Human Rights Act 1998 Management of Health and Safety at Work Regulations 1999 Medical Act 1983 Mental Capacity Act 2005 Mental Capacity Act Code of Practice Mental Health Act 1983 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) Offences against the Person Legislation Assaults on Emergency Workers (Offences) Act 2018 Protection from Harassment Act 1997 The Corporate Manslaughter and Corporate Homicide Act 2007 Criminal Justice Act 1988, section 39 Health and Safety (Consultation with Employees) Regulations 1996 Safety Representatives and Safety Committees Regulations 1977

Underpinning Knowledge	Author: Department of Health, (2015), Mental Health Act 1983: Code of Practice [Online] Available from: Mental Health Act 1983 [Accessed: 25/09/2024] Author: Department for Constitutional Affairs, (2007), Mental Capacity Act 2005 Code of Practice [Online] Available from: Mental-capacity-act-code-ofpractice.pdf [Accessed: 25/09/2024] Author: National Institute for Health and Care Excellence, (2015), Violence and aggression: short-term management in mental health, health and community settings [Online] Available from: Overview | Violence and aggression: short-term management in mental health, health and community settings | Guidance | NICE [Accessed: 25/09/2024] Author: Health and Safety Executive (HSE), (2022), Managing Health and Safety [Online] Available from: Managing health and safety - HSE [Accessed: 25/09/2024] Author: BMA, (2024), Removing patients from your GP practice list Accessed: 25/09/2024] Author: NHS, (2022), Violence Prevention and Reduction Standard [Online] Available from: NHS England » Violence prevention and reduction standard [Accessed: 25/09/2024] Available from NHS England » Violence prevention and reduction accessed [25/09/2024]
Equality Impact Assessment	This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law

1. Purpose

1.1 To demonstrate the commitment of Harrow Health CIC is committed to providing a safe, respectful, and supportive environment for both staff and patients. This policy outlines our

zero tolerance approach to all forms of abuse, harassment, aggressive or violent behaviour directed towards staff, other patients, or visitors.

1.2 Relevant Legislation Equality

- Act 2010
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998
- Management of Health and Safety at Work Regulations 1999 Medical Act 1983
- Mental Capacity Act 2005
- Mental Capacity Act Code of Practice Mental Health Act 1983
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Offences against the Person Legislation
- Assaults on Emergency Workers (Offences) Act 2018
- Protection from Harassment Act 1997
- The Corporate Manslaughter and Corporate Homicide Act 2007
- Criminal Justice Act 1988, section 39
- Health and Safety (Consultation with Employees) Regulations 1996 Safety
- Representatives and Safety Committees Regulations 1977

2. Scope

This policy applies to:

- Patients and service users referred via GPs or other healthcare professionals.
- Accompanying family members, carers, or visitors.
- Any third parties engaging with Harrow Health CIC services.

2.1 Harrow Health CIC have a general duty of care to protect staff from threats and violence at work.

3. What Is the NHS Zero-Tolerance Policy?

Fundamental principle:
NHS staff should be able to work without fear of physical or verbal abuse, harassment, or threatening behaviour.
This includes behaviour from patients, their relatives, or other visitors that compromises staff safety or well-being.

Definition of violence/abuse:
It is not limited to physical attacks; threats or behaviour that challenges the safety, well-being, or health of staff are included.

How This Applies to GP-Referral Community Providers

Community providers may remove a patient from their list if behaviour is violent or abusive. Written notification and documentation in the patient's records are typically part of the process.

3. Unacceptable Behaviour

The following behaviours will not be tolerated under any circumstances:

Verbal abuse: threats, shouting, swearing, insults, discriminatory or offensive remarks.

Physical abuse: any threatening gestures, aggressive behaviour, or acts of violence.

Harassment: repeated inappropriate behaviour, intimidation, bullying, or stalking.

Discrimination: racist, sexist, homophobic, transphobic, ageist, or any other discriminatory language or behaviour.

Property damage or theft: wilful destruction or unauthorised removal of property.

Fraudulent activity: attempts to obtain medication or services dishonestly.

Misuse of communication channels: harassment via phone, email, messaging platforms, or social media.

Persistent unreasonable demands: behaviour that disrupts the provision of fair and safe healthcare to others.

4. De-escalation

4.1 Patients exhibiting habitually unacceptable behaviour can be a widespread problem in organisations providing NHS care. Managing such behaviour puts a huge strain on time and resources and causes unacceptable stress for staff, who may need support in difficult situations. Harrow Health CIC understands that most Patients do not display such behaviour. This policy promotes the procedure for managing the small minority who do and should only be used on an exceptional basis.

4.2 Whilst any act of intimidating, aggressive or violent behaviour, verbal or physical, is not acceptable, Harrow Health CIC understands that patients can become aggressive or violent for several reasons. Harrow Health CIC has a zero-tolerance approach towards such behaviour and is committed to reducing the risk to staff and other Patients.

4.3 Some Patients may have a history of difficult behaviour and for them there needs to be an agreed management plan to mitigate risk for everyone who may encounter the Patient.

4.4 Patients may become aggressive during a home visit. The Patient's home setting will be less familiar to the GP or staff member, and help will be less readily available. In these situations, it is important to refer to Harrow Health Home Visiting Policy and Procedure, ensuring a risk assessment has been undertaken for making home visits which ensure the safety of members of the Harrow Health CIC team. A Home Visit Risk Assessment template is available.

4.5 The risks of aggression or violence will be mitigated by:

- Effective staff training
- Careful thought to the layout of the setting as a whole
- Easy escape routes from consulting and treatment rooms
- Discreet but accessible panic alarms

4.6 National Institute for Care and Health Excellence (NICE) Guidelines regarding managing violence and aggression in adults should be made available to staff. The guidelines 'Violence and aggression: short-term management in mental health, health and community settings' NG10 are downloadable from the NICE website.

4.7 NHS England has published the n NHS England » Violence prevention and reduction standard, which complements existing health and safety legislation.

The standard has been developed in collaboration with the Social Partnership Forum and its subgroups, including trade unions and the Workforce Issues and Violence Reduction Groups, and was endorsed by the Social Partnership Forum.

In addition to this standard, NHS England has also published NHS England » NHS violence prevention and reduction standard: guidance notes, which will further support Harrow Health CIC to share and communicate the risks of violence and its mitigation controls through processes that are robust and transparent. This guidance will help the implementation of a data-driven methods focusing on colleague health and wellbeing.

Professionals providing this service should be aware of the following:

- Certain factors can indicate an increased risk of physically violent behaviour; these must be assessed and recorded
- De-escalation can involve a range of techniques. Staff must receive training in these (as appropriate) and this will include training in the assessment of risk from violent or aggressive Patients
- Never put yourself at risk of harm and if a situation escalates, seek additional support or call the police
- Challenging behaviour has a variety of causes, including illness. Consider whether a lack of resources or other practice issues are to blame
- Seek ways to protect yourself, colleagues and other Patients from the risk of harm from violent or aggressive behaviour through anticipation or using techniques to defuse the situation

- Identify high-risk situations, for example, when people are kept waiting for a long time. Consider which staff may be vulnerable if someone becomes violent.
  Reception staff or doctors working alone are likely to be at greater risk and this must form part of the risk management policy and procedures at Harrow Health CIC
- Home visiting, where there is a risk of violence or aggression, must be carefully managed to minimise any risk to an individual healthcare professional
- If it is necessary to warn a Patient or to remove them from the practice list, there are clear steps to be taken to avoid a Patient complaint or other unsuccessful outcome which must be followed.

5. Enforcement Pathway

5.1 Formal Warning

For less serious but unacceptable incidents, a formal written warning will be issued. Patients may be required to sign a behavioural agreement committing to respectful conduct.

5.2 Removal from Services

In cases of repeated or severe misconduct, Harrow Health CIC reserves the right to withdraw services.

GP referrers and NHS England (where applicable) will be informed.

The patient will be notified in writing of the decision and reason.

5.3 Immediate Action

If a patient or visitor poses a serious threat to staff safety, staff will call 999 for police assistance.

Immediate removal from services may follow, in line with NHS England's procedures and the Special Allocation Scheme where applicable.

6. Online & Digital Conduct

This policy extends to behaviour outside face-to-face interactions, including:

- Abusive or threatening comments via social media
- platforms.
  Harassing or offensive messages sent via email, telephone, or text.

Such actions will be treated with the same seriousness as in-person incidents.

7. Reporting & Documentation

- All incidents must be reported by staff to the Service Manager, Clinical Lead and Patient Services.
- Incidents will be documented by the Patient Services Department in an internal incident log.
- Decisions relating to removal or escalation will be reviewed by the management team.

8. Household Considerations

Where services involve home visits, Harrow Health CIC may withdraw visits to an entire household if one member poses a safety risk to staff.

A risk assessment will be required, and staff will determine whether visiting should continue accompanied or with a safety plan in place approved by the Service and the Governance Department.

9. Patient Communication

- This policy will be made available on the Harrow
- Health CIC website.
  It will also be displayed in patient areas and included in new patient information materials.
- Staff will ensure that patients understand that abusive behaviour has consequences.

10. Commitment to Staff & Patients

Harrow Health CIC is committed to:

- Supporting staff who experience abuse.
- Ensuring patients continue to receive care in a safe environment.
- Maintaining fairness, transparency, and respect in all service delivery.

11. Definitions

11.1 De-escalation

De-escalation involves the use of techniques for the purpose of bringing about a gradual resolution of a potentially violent or aggressive situation where an individual begins to show signs of agitation and/or arousal that may indicate an impending episode of behavioural disturbance.

11.2 Zero Tolerance

Zero tolerance is the refusal to accept antisocial behaviour and eliminate undesirable behaviour, typically by strict and uncompromising application of the rules.

11.3 Conflict Resolution

Conflict resolution is the process by which two or more parties engaged in a disagreement, dispute or debate reaches an agreement to resolve it.

11.4 Violence

The intentional use of physical force or power threatened or actual, against oneself, another person, or against a group or community, that either result in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment, or deprivation" - World Health Organisation.

11.5 Physical Assault
Physical assault is the intentional application of force to the person of another, without lawful justification, resulting in physical injury or personal discomfort.

11.6 Non-Physical Assault
Non-physical assault is the use of inappropriate or discriminatory words or behaviour causing distress and/or constituting harassment.

11.7 Aggression
Aggression is behaviour, which is hostile, destructive, and/or violent.