



# Policy on Unreasonably Persistent Complaints and Unreasonable Customer Behaviour

## 1. Purpose

This policy sets out how Uckfield Town Council will manage a small number of situations where a customer's behaviour becomes unreasonable, unreasonably persistent, or vexatious.

The Town Council is committed to:

- Dealing with all complaints fairly, consistently, and impartially;
- Providing a high-quality service to all customers;
- Protecting staff from unacceptable behaviour;

However, in a small number of cases, customers may pursue complaints in a way that:

- Hinders the Town Council's ability to investigate;
- Places disproportionate demands on resources;
- Impacts the wellbeing of staff;

Uckfield Town Council will not tolerate abusive, offensive, threatening or other forms of unacceptable behaviour from customers. If this occurs, proportionate action will be undertaken to protect the wellbeing of staff and integrity of our processes. This policy outlines how such situations will be managed.

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## 2. Scope

This policy applies to all customers interacting with the Town Council, including:

- Residents
- Service users
- Representatives acting on behalf of others

It applies across all communication channels (e.g. phone, email, in person, social media).

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## 3. Definitions

### 3.1 Unreasonable Behaviour

Unreasonable behaviour includes actions by a customer which, because of their nature or frequency, hinder the Council's ability to deal with their complaint or the complaints of others.

This may involve:

- A single serious incident
- A pattern of behaviour over time

### **3.2 Unreasonably Persistent Complaints**

These are complaints that continue despite:

- The complaint being fully investigated
- A clear and final response being provided

Persistence may be considered unreasonable where the customer:

- Refuses to accept the outcome
  - Continues to raise the same issues without new evidence
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## **4. Definition of Vexatious or Unreasonably Persistent Communication**

In line with the Information Commissioner's Office, indicators include, but are not exhaustive to:

- (i) the burden on local authority staff;
- (ii) motive of the requester;
- (iii) value or intention of the request;
- (iv) harassment or distress caused to staff;

This behaviour can be characterised as:

### **4.1 Excessive Contact**

- Repeated phone calls, emails, or letters
- Contacting multiple officers about the same issue
- Continuing to contact the Council while a response is pending

### **4.2 Unreasonable Demands**

- Insisting on immediate responses or unrealistic deadlines
- Demanding to speak only to specific staff members
- Expecting outcomes outside Council policy or legal powers

### **4.3 Refusal to Engage Properly**

- Refusing to specify grounds of complaint (i.e. the specific issue)
- Ignoring reasonable explanations, or evidence as being factual
- Changing the basis of the complaint repeatedly

### **4.4 Vexatious or Obsessive Behaviour**

- Pursuing complaints with no clear purpose
- Submitting repeated complaints with minor variations
- Raising irrelevant or trivial issues

## **4.5 Abusive or Aggressive Behaviour**

- Use of threatening, offensive, or abusive language
  - Harassment or intimidation of staff
  - Making unjustified complaints or allegations about staff
  - Complaints made with an inappropriate motive such as personal grudges/civil matters.
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## **5. Principles**

Before applying this policy, the Council will ensure that:

- The complaint has been handled properly and fairly
- All reasonable efforts have been made to resolve the issue
- The decision is proportionate and evidence-based

The Council recognises that:

- Customers may be distressed or frustrated
  - Persistence alone does not make a complaint unreasonable
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## **6. Actions the Council May Take**

Where behaviour is deemed unreasonable, the Council may implement one or more of the following:

### **6.1 Contact Restrictions**

- Limiting contact to a single point of contact.  
(the Town Clerk will identify a suitable point of contact, based on the subject/circumstances of the complaint)
- Restricting contact to written communication only
- Setting limits on frequency of contact

### **6.2 Managing Correspondence**

- Declining to respond to repetitive or duplicate issues
- Returning irrelevant correspondence

### **6.3 Access Restrictions**

- Restricting access to Council offices
- Requiring appointments for visits
- If the circumstances lead to extreme behaviour, and threatens the immediate safety of staff, the matter will be reported to the Police

### **6.4 Closure of Complaints**

- Informing the customer that the matter is closed
  - Ending further correspondence on the issue
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## **7. Decision-Making Process**

When applying this policy, the Council will:

- Notify the customer in writing
  - Explain:
    - Why the behaviour is considered unreasonable
    - What restrictions are being applied
    - How long the restrictions will remain in place
  - Provide a copy of this policy
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## **8. Review and Appeals**

The Council may decide to review the contact arrangements for persistently unreasonable customers on a six-monthly basis, should matters persist. When the arrangement is reviewed, the single point of contact will normally write to the customer again, notifying them of the decision to either lift the arrangement, to continue the arrangement or place further impositions on contact.

The review will consider:

- Whether the policy has been applied correctly
- Whether the restrictions are proportionate

Customers may request a review of the decision by writing to the Town Clerk. The terms of any appeal will be set out when the customer is written to, with confirmation of the restrictions placed on contact.

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## **9. Record Keeping**

The Council will keep clear records of:

- The behaviour in question
  - Actions taken
  - Correspondence with the customer
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## **10. Equality and Accessibility**

The Council will have consideration for the Public Sector Equality Duty, and:

- Consider reasonable adjustments where required
  - Take account of vulnerabilities or disabilities
  - Ensure the policy is applied fairly and without discrimination
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## **11. Relationship to the Town Council's Complaints Policy**

This policy sits as an appendix to the Town Council's Complaints Policy and may be applied at any stage.