



SPC UNREASONABLE BEHAVIOUR POLICY

(INCLUDING ABUSIVE, PERSISTENT OR VEXATIOUS CONTACT AND/OR COMPLAINTS) – JULY 2026

- **1. Introduction**
- **2a. Unreasonable behaviour**
- **2b. Habitual or vexatious queries, contact or complainants**
- **3a. Definitions – Unreasonable behaviour**
- **3b Definitions – Abusive, persistent and vexatious contact including queries and/or complaints**
- **4. Imposing Restrictions**
- **5. New queries, contact and complaints (from members of the public and/or complainants who are treated as abusive, vexatious or persistent)**
- **6. Review**
- **7. Record keeping**

1. Introduction

1.1 This policy states what is considered unreasonable behaviour on the part of members of the public when engaging with Saltford Parish Council's staff or members, including behaviour from people making complaints. This policy identifies situations where a member of the public and/or complainant, either individually or as part of a group, might be habitual or vexatious and ways of responding to these situations.

1.2 This policy ensures that the ability of staff and/or members to conduct business is not adversely affected by those few individuals who behave in an unreasonable manner.

1.3 It intends to assist in identifying and managing persons who display unreasonable behaviour or seek to be disruptive to the Parish Council, elected Members and members of staff through pursuing an unreasonable course of conduct.

1.4 Unreasonable behaviour and habitual or vexatious complainants – or any form of habitual or vexatious contact from a member of the public - can be a problem for Council staff and members. The difficulty in handling such behaviour and complainants is that they are time consuming and wasteful of resources in terms of staff and/or member time.

1.5 This policy ensures staff have a safe working environment and are not exposed to unnecessary stress due to the unacceptable behaviour of others, and that staff are supported as appropriate. In cases of unreasonable behaviour including abusive, persistent or vexatious contact or complaints against a member of staff, this policy will work in conjunction with the Parish council's Dignity at Work Policy.

1.6 The purpose of this policy also is to empower local authority staff to deal confidently and effectively with unreasonable behaviour.

1.7 Saltford Parish Council recognises that its resources, including staff time, are limited and must be used where they can be most effective. This might mean that SPC cannot respond to every issue in the way a person would like if, in doing so, it would take up what the council regards as being a disproportionate amount of time and resources that could be used elsewhere to support the community and ensure continuity of Parish Council business.

1.8 Sometimes, due to the volume of work with which we deal, or staff capacity (the Parish Clerk works part time and generally there is no cover staff during periods of annual leave) SPC may not be able to respond immediately to requests or complaints from members of the public. This does not mean that those concerns are any less important to SPC. If we have asked for patience but an individual(s) continues to pursue their concerns, SPC may consider such behaviour to be unreasonable.

1.9 SPC is keen to engage positively with members of the public, and to resolve issues or complaints. It recognises a member of the public's right to be listened to and respected, and members of the public will be treated fairly and appropriately by Saltford Parish Council.

1.10 While the Council endeavours to respond with patience and sympathy to the needs of all members of the public including complainants, there are times when there is nothing further which can reasonably be done to assist or to rectify a real or perceived issue or problem.

2a. Unreasonable behaviour

2a.1 Saltford Parish Council recognises that, when a member of the public makes contact they may have reason to feel aggrieved, upset or distressed. SPC does not view assertive behaviour (for example, putting forward your case in a persuasive manner) as unreasonable. However, SPC will manage behaviour that is perceived by staff or members as aggressive, rude or abusive, or which places unreasonable demands on staff or members – including disproportionate use of their time - under this policy

2a.2 This policy defines behaviours that are not acceptable and deemed as unreasonable, to ensure that staff and members have a safe working environment and are not subject to unnecessary stress due to the unreasonable and unacceptable behaviour of others.

2a.3 This policy enables staff and members to effectively deal with unreasonable behaviour.

2a.4 The policy applies to all members of the public, all those who deal with Saltford Parish Council, behaviour between members, and behaviour between staff and members.

2a.5 Prior to considering its implementation the Council will send a copy of this policy to the person demonstrating unreasonable behaviour to give them prior notification of its possible implementation.

2a.6 Where unreasonable behaviours continue and have been identified in accordance with the criteria set out in the policy, Saltford Parish Council will seek agreement for the appropriate course of action to be taken. The policy details the options available to manage unreasonable behaviour.

2a.7 The Parish Clerk, as responsible officer, will notify, on behalf of the Parish Council, action that will be taken. SPC Councillors and Bath and Northeast Somerset Council may also be informed that a constituent has been designated as demonstrating unreasonable behaviours if deemed appropriate by the Council.

2a.8 The status of a person demonstrating unreasonable behaviour may be reviewed where the Council considers it appropriate. Where an indefinite restriction has been imposed in relation to a specific matter, there shall be no obligation on the Council to undertake periodic reviews unless there is a material change in circumstances.

2b. Habitual or vexatious queries, contact or complainants

2b.1 Raising of legitimate queries or criticisms of a complaints procedure as it progresses, for example if agreed timescales are not met, should not in itself lead to someone being regarded as a vexatious or an unreasonably persistent complainant. Similarly, the fact that a complainant is unhappy with the outcome of a complaint and seeks to challenge it once, or more than once, should not necessarily cause him or her to be labelled unreasonably persistent or vexatious.

2b.2 For the purpose of this policy the following definition of habitual or vexatious contact or complainants will be used:

The repeated and/or obsessive pursuit of:

- unreasonable contact, queries and/or complaints and/or unrealistic outcomes
- reasonable contact, queries and/or complaints in an unreasonable manner

In this policy the term habitual means 'done repeatedly or as a habit'.

2b.3 The term vexatious is recognised in law and means 'denoting an action or the bringer of an action that is brought without sufficient grounds for winning, purely to cause annoyance to the defendant'. The term complaint in this policy includes requests made under the Freedom of Information Act 2000 and the Data Protection Act 1998 and reference to the Complaints Procedure is, where relevant, to be interpreted as meaning a request under those Acts (for the purposes of the policy, this includes any subsequent updates or additions to these Acts).

2b.4 Where contact and/or complaints continue and have been identified as unreasonable, habitual or vexatious in accordance with the criteria set out below, Saltford Parish Council will seek agreement that the actions of a member of the public and/or a complainant are unreasonable, habitual and/or vexatious and for the appropriate course of action to be taken. The policy details the options available for dealing with habitual or vexatious queries, contact and/or complaints.

2b.5 The Parish Clerk, as responsible officer, will notify, on behalf of the Parish Council, a member of the public and/or complainant(s), in writing, of the reasons why their contact and/or complaint has been treated as unreasonable, habitual and/or vexatious and the action that will be taken. Bath and North East Somerset Council may also be informed that a constituent has been designated as a habitual or vexatious complainant if deemed appropriate by the Council.

2b.6 The Council may review the status of a complainant where it considers it appropriate. Where an indefinite restriction has been imposed in relation to a specific matter, the Council shall not be required to undertake periodic reviews unless there is a material change in circumstances.

3a. Definitions – Unreasonable behaviour

3a.1 Saltford Parish Council defines unreasonable behaviour as behaviour or language via any form of communication (including but not limited to electronic communications) that may cause staff or members to feel intimidated, threatened, unduly stressed or abused.

3a.2 Saltford Parish Council can invoke this policy on the basis of documented evidence that demonstrates that a member of the public's unreasonable behaviour has taken place over a period of time (i.e. not invoked on the basis of a single episode). This can include repeated behaviour to one person (staff or member) or single incidents of unacceptable behaviour to several people (staff or members), and includes unreasonable behaviour via all forms of communication.

3a.3 Evidence of unreasonable behaviour is necessary and required to invoke the policy, and may include a contact log (which may include a written record of a phone call or a face-to-face encounter), file notes, emails, social media, screen shots, letters etc.

3a.4 Examples of unreasonable behaviour includes (but is not limited to):

- i. Any form of physical abuse.
- ii. Threats.
- iii. Verbal abuse.
- iv. Harassment.
- v. Racist and sexist language.
- vi. Derogatory remarks.
- vii. Making inflammatory statements.
- viii. Offensive or inappropriate language.
- ix. Rudeness.
- x. Raising unsubstantiated allegations.
- xi. Aggression directed at staff or members.
- xii. Unnecessary repetitive contact.
- xiii. Anger perceived as aggression directed towards staff or members (Whilst SPC accepts that those in contact with the Parish Council - staff or members - may feel angry, it is not considered acceptable when that anger becomes aggression directed towards staff or members).
- xiv. When social media is used (i.e. including cyber bullying) – if/when this occurs, SPC will try to identify the perpetrator, take steps to remove the offending material from view and,

where appropriate, initiate action against the offender i.e. blocking. This is in line with SPC's Social Media policy.

3a.5 Unreasonable requests may include:

- i. Requesting a response within unreasonable timescales.
- ii. Repeating the same request in different ways / forms / approaches, including when information has been provided.
- iii. Insisting on speaking with certain members of staff.
- iv. Adopting a "capture-all" approach by contacting many staff members and third parties about the same issue.

3a.6 Communication may be considered unreasonable if, for example, individuals:

- i. Continually contact us while SPC are in the process of looking at a matter.
- ii. Make a number of approaches about the same matter without raising new issues (including when substantial time and information has been provided already on the same matter).
- iii. Refuse to accept a decision made where explanations for the decision have been given.
- iv. Continue to pursue complaints/issues which have no substance.
- v. Continue to pursue complaints/issues which have already been investigated and determined.
- vi. Continue to raise unfounded or new complaints arising from the same set of facts.

3b Definitions – Abusive, persistent and vexatious contact including queries and/or complaints

3b.1 Saltford Parish Council defines unreasonably persistent and vexatious contact, queries and/or complainants as those who, because of the frequency or nature of their contacts with the Parish Council, hinder the Parish Council's consideration of their or other people's contact and/or complaints or the ability to carry out the business and functions of the Council. The description 'unreasonably persistent' and 'vexatious' may apply separately or jointly to a particular member of the public and/or complainant.

3b.2 Examples include the way in which, or frequency with which, a person contacts SPC or a complainant(s) raise their complaint with staff, or how complainants respond when informed of the Parish Council's decision about the member of the public and/or complaint.

3b.3 Features of an unreasonably persistent and / or vexatious complainant include the following (the list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category):

An unreasonably persistent and/or vexatious complainant may:

- i. Have insufficient or no grounds for their contact, queries or complaint and be making contact or a complaint only to annoy (or for reasons that he or she does not admit or make obvious) including to cause a hinderance to the Parish Council.
- ii. Refuse to specify the grounds of a query (e.g. request for information) or complaint despite offers of assistance.

- iii. Refuse to co-operate with a query or complaints investigation process while still wishing their query to be answered or complaint to be resolved.
- iv. Refuse to accept that issues are not within the remit of the complaints policy and procedure despite having been provided with information about the scope of the policy and procedure
- v. Refuse to accept that issues are not within the power of the Council.
- vi. Insist on a query to SPC or a complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice (e.g. insisting that there must not be any written record of the query or complaint).
- vii. Make what appear to be groundless queries, requests for information or complaints about the staff dealing with the query / complaints, and seek to have them dismissed or replaced make an unreasonable number of contacts with the Parish Council, by any means in relation to a specific request or complaint or complaints.
- viii. Make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the member of the public and/or complainant (an example of this could be a person or complainant who insists on immediate responses to questions, frequent and / or complex letters, faxes, telephone calls, e-mails or other social media communications).
- ix. Harass or verbally abuse or otherwise seek to intimidate staff dealing with their query or complaint, in relation to their query and/or complaint by use of foul or inappropriate language or by the use of offensive and racist language.
- x. Raise subsidiary or new issues whilst a query (e.g. request for information) and/or complaint is being addressed that were not part of the query or complaint at the start of the complaint process.
- xi. Introduce trivial or irrelevant new information whilst a query (e.g. a member of the public requesting information) and/or a complaint is being investigated and expects this to be taken into account and commented on.
- xii. Change the substance or basis of the query (e.g. request for information) or complaint without reasonable justification whilst the query or complaint is being addressed.
- xiii. Deny statements he or she made at an earlier stage in the engagement or complaint process.
- xiv. Electronically record meetings (i.e. record meetings that are not open to the public to attend) and/or conversations without the prior knowledge and consent of the other person(s) involved.
- xv. Adopt an excessively 'scattergun' approach, for instance, pursuing the same query or complaint or complaints not only with the Parish Council, but at the same time with, for example, a Member of Parliament, other Councils, elected Members of this and other Councils, the Parish Council's Independent Auditor, the Monitoring Officer, the Police or solicitors.
- xvi. Refuse to accept the outcome of a query or the complaint process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given, or submitting further queries or complaints about the same or similar matter.
- xvii. Make the same query or complaint repeatedly, perhaps with minor differences, after the engagement process or complaints procedure has been concluded and insist that the minor differences make these 'new' queries or complaints which should be readdressed in their entirety or put through the full complaints procedure.

- xviii. Persistently approach the Parish Council through different routes about the same or similar issue including query or complaint(s).
- xix. Persist in seeking an outcome which Parish Council has explained is unrealistic for legal or policy (or other valid) reasons.
- xx. Refuse to accept documented evidence as factual.
- xxi. Complain about or challenge an issue based on an historic and/or an irreversible decision or incident.
- xxii.** Combine some or all of these features.

3b.4 The above is not exhaustive. For the purposes of this policy, 'query' relates to any contact with SPC, including requests for information.

3b.5 Matter-Specific Restriction - A matter-specific restriction is a restriction imposed preventing further contact, correspondence or complaints relating to a particular issue, complaint, decision or set of circumstances that has been fully considered and concluded by stated representatives of the Council. Such a restriction may be imposed for a fixed period or indefinitely where the Council considers further engagement to be unreasonable, persistent or vexatious.

4. Imposing Restrictions

4.1 Saltford Parish Council has a zero-tolerance position on violence and/or threats towards staff or members, such behaviour will be reported to the police. Staff and members can terminate phone calls with members of the public who behave unreasonably, aggressively or abusively, and take steps to protect their own safety if they feel threatened during an in-person (face-to-face) encounter or via any form of communication.

4.2 In the instances of a vexatious, abusive or persistent contact, query or complaint, Saltford Parish Council will ensure that the complaint is being, or has been, investigated properly according to the adopted complaints procedure.

4.3 In the first instance of either unreasonable behaviour or a vexatious, abusive or persistent contact, query or complaint, the Parish Clerk will consult with the Chair and/or Vice Chair of Saltford Parish Council prior to issuing a warning to the member of the public and/or complainant. The Parish Clerk will contact the member of the public and/or complainant in writing, including by email, to explain why this behaviour is unreasonable, abusive, persistent or vexatious causing concern and ask them to change this behaviour and outline the actions that the council may take if they do not comply.

4.4 If the disruptive behaviour continues, the Parish Clerk (or if better placed, a member) will take steps to limit communications with the member of the public / complainant as in the options listed below, advising them that the way in which they will be allowed to contact the Parish Council in future will be restricted. The Parish Clerk will make this decision in consultation with the Chair and/or Vice Chair, and they (or a member, if better placed) will inform the complainant in writing of the restrictions being imposed, whether they are time-limited or indefinite, the reasons for the restrictions, and any review arrangements that apply.

4.5 Any restriction imposed under this policy shall be appropriate, proportionate and tailored to the circumstances of the case.

Restrictions may be imposed for a defined period, normally between six and twelve months, where the Council considers there is a reasonable prospect that the behaviour may improve.

Where the Council determines that a matter has been fully considered, investigated and concluded, and that further contact regarding that specific matter is unreasonable, persistent or vexatious, the Council may impose an indefinite restriction preventing further contact regarding that matter. Such restrictions may apply to the original matter and any substantially similar or related issues arising from the same circumstances.

An indefinite restriction shall not prevent a person from contacting the Council regarding new matters, legitimate service requests, statutory rights, or unrelated issues.

4.6 Restrictions will be tailored to the individual circumstances of the case and may include one or more of the following:

- i. Terminating telephone calls where behaviour is considered aggressive, abusive, offensive, threatening, unreasonable, persistent or vexatious.
- ii. Blocking or filtering email communications where the volume, frequency, content or nature of communications places an unreasonable burden on Council resources or contains abusive, offensive or inappropriate material.
- iii. Blocking access to or interaction through the Council's social media accounts in accordance with the Council's Social Media Policy.
- iv. Refusing to respond to communications that repeat matters already addressed, determined or concluded by the Council.
- v. Requiring communications to be made only through a nominated third party, such as a solicitor, adviser or other representative approved by the Council.
- vi. Restricting communications to a single point of contact within the Council.
- vii. Restricting communications to specified methods, dates, times or frequencies.
- viii. Requiring meetings or face-to-face contact to take place only in the presence of an appropriate witness or representative of the Council.
- ix. Advising the individual that the Council will not acknowledge, respond to or enter into further correspondence regarding a specified matter, complaint, issue or substantially related issue that has been concluded.
- x. Imposing an indefinite prohibition on contact relating to a specific matter where the Council has determined that further engagement serves no legitimate purpose and constitutes unreasonable, persistent or vexatious conduct.
- xi. Any combination of the above measures as the Council considers necessary and proportionate.

4.7 When the decision has been taken to apply this policy to a complainant, the Parish Clerk will contact the complainant in writing to explain:

- Why the decision has been taken

- What action is being taken
- Whether the restriction is time-limited or indefinite, and any review arrangements that apply.

4.8 The Parish Clerk will send a copy of this policy in the email or letter to the member of the public or complainant.

4.9 Where a member of the public or complainant continues to behave in a way that is unreasonable or unacceptable, the Parish Clerk, in consultation with the Chair and Vice Chair may decide to refuse further contact relating to a specified matter, or in exceptional circumstances refuse all contact where this is considered necessary, reasonable and proportionate, and if not already agreed by the Parish Council, to include stopping any investigation into answering any query and/or complaint.

4.10 Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff or members, other options will be considered, e.g. the reporting of the matter to the police or taking legal action. In such cases, the member of the public and/or complainant may not be given prior warning of that action.

4.11 When unreasonable behaviour, including vexatious, abusive or persistent queries and/or complaints, is targeted at a particular member of staff or member of the council, Saltford Parish Council may impose an open-ended ban to prevent the member of the public from contacting that person in order to protect their welfare.

4.12 Similarly, publication of derogatory, abusive, threatening or harassing remarks against staff or a member (in any form, including but not exclusively printed media and social media) Saltford Parish Council may impose an open-ended ban and consider reporting the matter to the police.

4.13 The fact that a member of the public and/or complainant is judged to be unreasonably persistent or vexatious and any restrictions imposed on Council's contact with him or her, will be recorded and notified to those who need to know within the Council. This will include whether any restriction is time-limited or indefinite and, where applicable, the specific matter to which the restriction relates.

5. New queries, contact and complaints (from members of the public and/or complainants who are treated as abusive, vexatious or persistent)

5.1 New communications or complaints from people who have come under this policy will be treated on their merits. The Parish Clerk and the Chair and Vice Chair will decide whether any restrictions that have been applied before are still appropriate and necessary in relation to the new communication or complaint. A blanket policy is not supported, nor is ignoring genuine service requests or complaints where they are founded. Where the Council has imposed an indefinite restriction relating to a specific matter, the Council will not be required to reconsider, acknowledge or respond to further correspondence relating to that matter or substantially similar matters arising from the same circumstances.

5.2 Should a communication or complaint be regarded as unreasonable or vexatious further to previous contact made, this will be considered when reviewing any ongoing contact restrictions.

6. Review

6.1 Where a restriction has been imposed for a defined period, the Parish Clerk, in consultation with the Chair and Vice-Chair, shall review the restriction after six months and thereafter at six-month intervals if the restriction remains in force.

6.2 Where an indefinite restriction has been imposed in relation to a specific matter under section 4.5 or 4.6, there shall be no requirement for periodic review. The Council may review such a restriction at its discretion where there is a material change in circumstances or where the Council considers a review appropriate.

6.3 The individual will be notified in writing where the Council decides to extend, amend or remove a restriction following a review.

6.4 Nothing in this section shall require the Council to re-open, reconsider or correspond further regarding a matter that has been concluded.

7. Record Keeping

7.1 The Parish Clerk shall maintain appropriate records of all decisions made under this policy and any restrictions imposed.

7.2 Records shall include:

- The name and contact details of the individual subject to the restriction.
- The nature of the behaviour that resulted in the application of this policy.
- The evidence relied upon by the Council.
- The date on which the restriction came into effect.
- Whether the restriction is time-limited or indefinite.
- The scope of the restriction, including any specific matters to which it applies.
- Any review dates applicable to time-limited restrictions.
- Details of correspondence notifying the individual of the restriction and any subsequent review or variation.

7.3 Records shall be retained in accordance with the Council's data protection, retention and records management requirements.

7.4 The existence of a restriction and any operational requirements arising from it may be communicated to Councillors, employees and other relevant parties where necessary for the effective administration of Council business and the protection of staff and Members.

Last revised and adopted: July 2026

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