



# Unreasonable Behaviour Policy

**Consumer Council for Northern Ireland**  
**April 2024**

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# Document Review History

This policy is a controlled document and is held centrally by the Director of Corporate Services

The following table records the amendments made to the policy since its inception

Version	Date Actioned	Actioned by	Reason for change	Approved by
1	May 2022	N Charnley	First document version.	S Kennerley N Chundur
2	April 2024	N Charnley	Annual review	S Kennerley N Chundur

## Linked Documents

- Consumer Complaints Handling Policy
- Vulnerable Consumers
- [Northern Ireland Public Services Ombudsman](#)

# 1.0 Background

The Consumer Council is committed to providing excellent customer service to everyone who contacts us. Everyone is entitled to be treated:

- Respectfully
- Courteously and
- In a polite manner.

Where a customer raises an issue / complaint, they have a right to expect to be dealt with fairly and impartially. The Consumer Council's mission is to be open and accessible to all consumers.

## 2.0 Introduction and Policy Context

The behaviour or actions of some consumers can make it very challenging to deal with their complaint and sometimes conduct can go beyond what is acceptable. There are boundaries within which we must operate to ensure the safety and welfare of our team. This policy explains what we consider to be unreasonable behaviour and the actions we might take if a consumer's behaviour goes beyond what we deem to be acceptable. Please also refer to Section 3.2 Our Boundaries for examples of behaviours that will not be tolerated.

Our staff will report any behaviour they consider unacceptable to the Head of Insight & Investigations, and details of the incident will be recorded on the electronic case file held on behalf of the consumer.

We will always try to make sure that any action we take is the minimum necessary to deal with the problem, and we will take into consideration any relevant personal circumstances, including, how serious the complaint is and ultimately the needs of the consumer.

This includes:

- Giving the consumer the opportunity to change their behaviour or action before a decision is taken
- Advising the consumer in writing what action we are taking and why.

In exceptional circumstances, we may refuse to have further contact with consumers who are unreasonably persistent or abusive. Where such limitations are implemented, this decision will be sanctioned by the Chief Executive.

Where threats are received against individual staff members/voluntary advisers or office property, immediate action may be taken including informing the police or other emergency services.

## 3.0 Unreasonable Behaviour Boundaries and Scope

### 3.1 What is Unreasonable Behaviour?

We do not view behaviour as unreasonable just because a person is forceful or determined. However, we do consider behaviour that results in unreasonable demands on the Consumer Council or unreasonable conduct towards our staff to be unacceptable.

When a consumer behaves unreasonably, the Consumer Council has a duty of care to protect its staff and consider the effect of this behaviour on our ability to continue providing that consumer with a high quality of service.

The circumstances that led to a consumer complaint or the stress and inconvenience caused in trying to resolve it, can result in the person becoming frustrated, angry, and upset. The Consumer Council understands that people may act out of character in times of trouble or distress and this is always taken into consideration.

### 3.2 Our Boundaries

The Consumer Council will not tolerate unreasonable behaviour including aggression, rudeness, abuse, and threats of violence).

Examples of unreasonable behaviour include:

- Rudeness – swearing (generally or directed at a member of staff), persistent interruption, name calling or general discourtesy
- Anger – shouting
- Aggression in the form of – threats of physical harm to person(s) or property, behaviour which indicates that physical harm to person(s) or property is imminent or actual physical aggression.
- Insulting or disparaging remarks or comments on the grounds of an individual's sex, marital status, sexual orientation, disability, race, colour, national or ethnic origin, religion, belief or age
- Inflammatory remarks or personal remarks directed at a member of staff.
- Rude, aggressive, extreme or explicit correspondence may not be answered, depending on the severity.

Special contact arrangements through an intermediary may be implemented if direct contact is no longer appropriate.

NOTE: These are examples and not a definitive list of unacceptable behaviours. Other behaviours not included in the above list may still constitute unacceptable behaviour.

Anyone displaying such behaviour through any or all channels of communication (i.e. telephone, face to face and digital methods of contact), will be informed of the Consumer Council's Unreasonable Behaviour Management Procedure (see Section 4) and advised that any further communication will be terminated unless more moderate language is used.

### **3.3 Examples of Unreasonable Levels of Contact or Harassment**

If unreasonable or persistent levels of contact with staff occur, the Consumer Council will implement its Unreasonable Behaviour Management Process (see Section 4).

For example, the Consumer Council can advise that a complaint will not be considered any further, an unproductive telephone call will be terminated, communications with a consumer will be suspended (for a fixed time-period) or no further correspondence in relation to the complaint will be answered and all communications will be ceased.

Alternatively, the consumer may be advised that their complaint is best dealt with by another organisation.

Examples of unreasonable levels of contact or harassment include:

- Being unreasonably persistent (e.g. frequently calling the Consumer Protection Team to raise points which have already addressed)
- Sending us multiple, repetitive or irrelevant correspondence.

NOTE: These are examples and not a definitive list.



## 4.0 Unreasonable Behaviour Management Process

The Consumer Council has developed a five-step process for managing unreasonable behaviour.

### 4.1 Steps in the Process

1. The first instance of unreasonable behaviour will be highlighted to the individual by the Consumer Council and made clear that this behaviour must stop.
2. Should this behaviour continue, then the second instance will result in a warning being issued to the consumer on the understanding that any further incidences will result in contact being suspended or possibly terminated.
3. If a third abusive contact is made by a consumer via any method of communication, then any further contact by the Consumer Council Consumer Protection Team with that consumer will be immediately ceased.
4. A written confirmation of the termination of contact will be issued to the consumer on cessation with the reasons for terminating contact clearly documented. A timescale may also be included (e.g. no further contact is to be made to the Consumer Council's Consumer Protection Team for a period of 6 months from X date).
5. If the consumer wishes to appeal this decision, or raise a grievance, they must do so using the Consumer Council's Internal Complaints Handling Process. The complaint will be treated fairly and independently in line with the Consumer Council's Internal Complaint Handling Policy (ref Section 6).

### 4.2 Record Keeping

Case records on the Consumer Council's Customer Relationship Management system will be updated following each incidence of unreasonable behaviour in line with this process.

NOTE: Threats of any kind are unacceptable and will result in immediate escalation to step 3 of the process, irrespective of previous behaviour. Any threats made against any member of the Consumer Council may also be reported to the police.

### 4.3 Timescales for Suspension or Cessation of Service

There is no set time period for suspension or cessation of services on the grounds of being unreasonably persistent. This is because the nature of the persistence will inevitably vary. Each incidence will be reviewed on an on-going and case-by-case basis.

## 4.4 Review Period

Reviews of decisions to restrict a complainant's contacts, or the Council's responses to those contacts, should be carried out in accordance with the timescales set at the point of contact suspension or cessation or at least every six months by the Head of Insight & Investigations / Consumer Protection Supervisor (or deputy).

If no further contact has been received from the complainant over a period of six months, consideration may be given to cancelling the restrictions. However, urgent assessment will be necessary to re-introduce measures if behaviour which led to the original decision recommences.

## 4.5 Setting Reasonable Expectations

The Consumer Council has a responsibility to manage the expectations of consumers who contact us regarding complaints. We will always endeavour to let consumers know from the outset what can and cannot be achieved.

If a consumer repeatedly raises issues that are beyond the Consumer Council's remit or scope, insists that more time be spent on a complaint than is warranted or directs the Consumer Council on how to handle the complaint, we will consider these demands to be unreasonable.

## 5.0 Action Taken to Address Unreasonable Behaviour

### 5.1 Telephone Calls

- Where a consumer behaves unreasonably during a telephone call to a member of Consumer Council staff, we will ask them to change their behaviour. If they persist in behaving unreasonably, they will be informed that the call will be terminated. If this action does not encourage the caller's behaviour to improve, the staff member will terminate the call.
- The staff member who terminates the call must report the incident to the Head of Insight & Investigations, and a written note of the telephone conversation will be made and recorded on the consumer's electronic case file.

### 5.2 Persistent Contact

Where a consumer is unreasonably persistent, for example by telephoning us several times a day for a number of days in succession, or by sending us voluminous or repetitive emails or letters, we will ask them to reduce their contact with the office to that which is absolutely essential. This is to ensure a proportionate level of response across our service provision.

### 5.3 Mitigation / Reasonable Requests

If our request is ignored, we will take steps to limit their contact with the office. Such steps might include requiring contact in a particular form – for example:

- By letter only
- Requiring telephone contact on specified days or at specified times
- Insisting that contact is only made with specific staff member(s) or through a third party to contact us on the persons behalf.

Any member of our staff who directly experiences aggressive or abusive behaviour has the authority to deal with it immediately in a way they consider appropriate and in line with this policy.

## 6.0 Complaints About Our Service

If a consumer is unhappy with the actions taken by the Consumer Council, they can raise a formal complaint as per our Consumer Complaints Handling Policy. This can be found on our website: [www.consumerCouncil.org.uk](http://www.consumerCouncil.org.uk) or a copy can be requested via post, telephone, or email.

Tel: (028) 902 51600

Freephone: 0800 121 6022

Email: [contact@consumerCouncil.org.uk](mailto:contact@consumerCouncil.org.uk)

Freepost: FREEPOST: THE CONSUMER COUNCIL

If after our investigation, the consumer remains dissatisfied with the actions taken, a complaint can be made to the [Northern Ireland Public Services Ombudsman](#) details of which are provided below:

Northern Ireland Public Services Ombudsman  
Progressive House  
33 Wellington Place,  
Belfast, BT1 6HN

Telephone: 02890 233821

Text Phone: 02890 897789

Freephone: 0800 34 34 24

Email: [nipso@nipso.org.uk](mailto:nipso@nipso.org.uk)

Freepost: FREEPOST NIPSO

**Consumer Council for Northern Ireland**

Floor 3, Seatem House

28-32 Alfred Street

Belfast BT2 8EN

**Freephone:** 0800 121 6022

**Email:** [contact@consumercouncil.org.uk](mailto:contact@consumercouncil.org.uk)

**Website:** [www.consumercouncil.org.uk](http://www.consumercouncil.org.uk)

