



Lewisham

# Managing unreasonable behaviour policy

April 2026

## Document control

<b>Version number</b>	<b>Date</b>	<b>Purpose/change</b>	<b>Authorisor</b>
Version 1	October 2024	Revision to comply with Ombudsmen complaint-handling codes	Executive Director, Corporate Resources
Version 2	April 2026	Update with Best Practice	Head of Corporate Customer Relations

## Contents

1. Introduction.....	3
2. Purpose of this policy .....	3
3. Who this policy applies to.....	3
4. What We Mean by Unreasonable Behaviour.....	4
5. The Process We Will Follow .....	4
6. What This Policy Does Not Cover .....	5
7. Equality, Accessibility and Fairness .....	5
8. Review of Arrangements .....	5
9. Further Review and Ombudsman .....	5

## 1. Introduction

The Council is committed to providing services that are fair, accessible, and respectful to all residents. We recognise that people may feel frustrated, upset, or distressed when contacting us, particularly when raising concerns or complaints. We welcome feedback and complaints and use them to improve our services.

In a small number of cases, the way an individual behaves when contacting the Council can make it difficult to resolve issues, place unreasonable demands on resources or affect the wellbeing of staff. This policy explains how the Council will manage such behaviour in a fair, proportionate, and transparent way.

## 2. Purpose of This Policy

This policy explains how the Council manages unreasonable behaviour when someone contacts us. The purpose of this policy is to:

- protect staff from behaviour that causes distress, harassment, or disruption.
- ensure the Council can continue to deliver effective services for all residents.
- manage behaviour fairly and consistently without preventing access to services.
- clearly explain the steps the Council may take if behaviour causes concern.
- ensure decisions are proportionate, time-limited, and regularly reviewed.

## 3. Who This Policy Applies To

This policy applies to anyone who contacts or interacts with the Council, including residents, businesses, service users, representatives, and advocates. It applies to all forms of contact, including email, letters, telephone calls, online contact, social media, and face-to-face discussions.

## 4. What We Mean by Unreasonable Behaviour

In most cases, complainants are helpful, polite and patient and they give us time to do our job. This means that their complaints can be dealt with quickly and efficiently. However, the behaviour of a minority of complainants can make investigating and resolving a complaint difficult. These complainants can also take up a lot of staff time, leaving less time to help others.

Examples of unreasonable behaviour may include (this is not an exhaustive list):

- repeatedly contacting the Council about the same issue after it has been fully considered and responded to.
- contacting multiple staff or services about the same issue at the same time.
- refusing to co-operate with reasonable requests needed to resolve an issue.
- making excessive or unreasonable demands for immediate responses.
- using abusive, threatening, or discriminatory language.
- making repeated unfounded allegations against staff.
- continuing to pursue an issue where there is no new evidence or information.

## 5. The Process We Will Follow

The Council follows a staged approach when behaviour causes concern. The aim is always to resolve issues informally where possible and to be clear about expectations.

All staff are authorised to give informal warnings to individuals who act in an unreasonable way, to give such individuals the opportunity to modify their behaviour.

**Where there is an immediate risk to staff well-being all staff are authorised to terminate any meeting, interview or phone call in which the behaviour of the complainant is abusive, threatening, or unproductive.**

### Step 1 – Warning

When a member of staff believes that a complainant's behaviour meets the threshold of unreasonable, we will write to the individual explaining why and giving examples of which behaviour is causing concern, why it is problematic, and what may happen if it continues. Warnings are issued by the service responsible for the matter at senior manager level.

### Step 2 – Decision to manage contact.

If behaviour continues after a warning, the Council may decide to put arrangements in place to manage future contact. This decision is made by the Director for the service responsible, based on evidence and consideration of individual circumstances. The decision will be confirmed in writing. Arrangements may include (this is not an exhaustive list):

- Accepting only written contact from the complainant
- Limiting the complainant to one contact point in the Council
- Accepting telephone calls only on a specific day or time of day
- Deciding to end our investigation of the complaint and advising the complainant in writing that we have done this and why
- Writing to the complainant to say that in future, we will simply read and file their letters/emails unless they contain information that we think is new.

Any arrangements put in place under this policy are time-limited and are reviewed at least every 12 months.

### **Step 3 – Right to Appeal**

The individual may appeal to the relevant Executive Director if they are unhappy with the decision to restrict their contact with the Council. This appeal must be in writing and within 20 working days of the date of the decision.

Appeals are considered by an Executive Director, who was not involved in the original decision. The outcome will be provided in writing.

### **6. What This Policy Does Not Cover**

This policy does not restrict statutory rights.

Requests under Freedom of Information law or data protection law, including Subject Access Requests, are not covered by this policy and may continue through the usual routes.

### **7. Equality, Accessibility and Fairness**

The Council will consider individual circumstances when applying this policy, including disabilities, health conditions, or vulnerabilities, and will make reasonable adjustments where appropriate.

### **8. Review of Arrangements**

The review will be completed by the service that implemented the arrangements and will consider whether they remain necessary and proportionate. Residents will be informed of the review outcome in writing.

### **9. Further Review and Ombudsman**

If you remain dissatisfied after the appeal process, you will be told how to contact the relevant Ombudsman for independent review.