



Managing Unacceptable Behaviour

Policy

Approved: April 2026

Reviewed:

1. Introduction

- 1.1 This policy sets out NILGOSC's approach to managing the relatively few members or other stakeholders whose actions or behaviours are considered to be unacceptable. The term 'member' includes anyone acting on behalf of another person or who contacts our offices in connection with an aspect of NILGOSC's services. The principles set out in this policy apply to NILGOSC's dealings with its members in all circumstances.

2. Purpose

- 2.1 To deal fairly, honestly, consistently and appropriately with all members, including those whose actions NILGOSC consider unacceptable. NILGOSC believes that all members have the right to be heard, understood and respected. NILGOSC also considers that our employees and NILGOSC's Management Committee have the same rights.
- 2.2 To ensure that other members, NILGOSC employees and Management Committee are not disadvantaged by the acts of members who behave in an unacceptable manner.
- 2.3 To make it clear to all members, both at initial contact and throughout their dealings with NILGOSC, the types of actions and behaviours NILGOSC considers to be inappropriate and to set out how NILGOSC might manage such actions.
- 2.4 To provide a service that is accessible to all members. However, where NILGOSC considers a member's actions to be unacceptable, NILGOSC retains the right to restrict access to the complaints procedure for a period of time where appropriate, or restrict access around communications.

3. Defining Unacceptable Actions

- 3.1 In times of trouble or distress, it is not unusual for people to act out of character. NILGOSC does not view behaviour as unacceptable just because an individual is forceful or determined. In addition, with regard to member service provision, NILGOSC recognises that there are individuals with specific service needs associated with a particular disability or other similar need, who may as a consequence of that need present themselves in a particular way and relevant training for employees will be made available. NILGOSC do take cognisance of each individual's circumstances and make arrangements to respond appropriately.
- 3.2 However, the actions of members who are angry, demanding or persistent may result in unreasonable demands on NILGOSC or unacceptable behaviour towards employees and can have an adverse impact on employees' ability to do their work and provide a service to others. NILGOSC considers these actions to be

unacceptable and aims to manage them under the terms of this policy. These actions can be grouped under three broad headings:

Aggressive or Abusive Behaviour

3.3 Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (whether verbal or written) that may give cause for employees to feel afraid, threatened or abused.

3.4 Examples of aggressive/ abusive behaviours:

- Threats
- Physical violence
- Personal verbal abuse
- Derogatory remarks
- Rudeness
- Inflammatory statements
- Unsubstantiated allegations

3.5 NILGOSC expects its employees to be treated courteously and with respect. Violence or abuse towards employees is unacceptable. NILGOSC recognises that anger can be felt by members about their request or complaint. However, it is not acceptable when anger escalates into aggression directed towards employees of NILGOSC.

Unreasonable Demands or Levels of Contact

3.6 Members may make what we consider unreasonable demands on NILGOSC's services through the amount of information they seek, the nature and scale of service they expect or the number of approaches they make. What amounts to unreasonable demands will always depend on the circumstances surrounding the behaviour and the seriousness of the issues raised by the member.

3.7 Examples of unreasonable demands or levels of contact:

- Demanding responses within an unreasonable time-scale
- Insisting on seeing or speaking to a particular member of staff when that is not possible
- Repeated phone calls, letters, emails, or visits to our offices
- Repeatedly changing the substance of a complaint or repeatedly raising unrelated concerns
- Repeated failure to identify the precise issues they wish to be investigated despite reasonable efforts by NILGOSC to help them to do so.

- 3.8 NILGOSC consider these demands to be unacceptable and unreasonable if they impact substantially on our ability to deliver services, such as taking up an excessive amount of employee time to the disadvantage of other members or functions.

Unreasonable Persistence

- 3.9 Some members will not or cannot accept that NILGOSC is unable to assist them further or provide a level of service other than that already provided. Unreasonable persistence is continued, incessant and unrelenting conduct that has a disproportionate and unreasonable impact on NILGOSC's employees, services, time and/or other resources.

- 3.10 Examples of unreasonable persistence:

- An unwillingness or inability to accept reasonable and logical explanations including final decisions that have been comprehensively considered and dealt with under the internal complaints procedure;
- Refusal to follow established procedures for dealing with complaints;
- An unwillingness or inability to accept explanations relating to what NILGOSC can or cannot do;
- Continuing to pursue an issue without presenting any new information.

- 3.11 Sending multiple emails to many members of staff is also considered to be unacceptable. In the first instance, an individual who sends multiple emails will be advised of a nominated contact within NILGOSC. This will be a designated officer who is best placed to deal with the subject the individual wishes to pursue. Where the individual fails to adhere to these arrangements, the actions set out in sections 4 and 5 below may be invoked.

- 3.12 NILGOSC considers the actions of persistent enquirers or a serial complainant to be unacceptable when they take up what NILGOSC considers to be a disproportionate amount of time and resources. The actions of serial complainants who raise a range of issues with NILGOSC will be monitored. The actions set out in sections 4 and 5 below may be invoked.

4. Managing Unacceptable Actions

- 4.1 How NILGOSC manages unacceptable actions will depend on their nature and extent:

- If it adversely affects our ability to do our job and provide a service to others, NILGOSC may need to restrict an individual's contact with our offices in order to manage the unacceptable action. NILGOSC will aim to do this in a way that allows the issue to be resolved or for the service to be provided through

NILGOSC's normal processes for the matter that is the subject of the complaint or enquiry.

- NILGOSC may restrict contact in person, by telephone, letter or email or by any combination of these. NILGOSC will try to maintain at least one form of contact, and this will be advised to the individual.
- In extreme cases, NILGOSC will advise the individual in writing that their name has been placed on a 'no personal contact' list. This limits how they contact NILGOSC – they may only communicate either in writing or through a third party.

4.2 The threat or use of physical violence, verbal abuse or harassment towards any NILGOSC employee is likely to result in the termination of all direct contact with the individual concerned. Incidents in which physical violence is used or threatened will be reported to the Police.

4.3 NILGOSC will not respond to correspondence that is abusive to employees or which contains allegations lacking substantive evidence. In these circumstances NILGOSC will advise the individual that NILGOSC considers their language to be offensive, unnecessary and unhelpful. NILGOSC will ask them to refrain from using such language and advise that NILGOSC will not respond to their correspondence unless they do.

4.4 Employees will terminate phone calls if the caller is considered aggressive, abusive or offensive. The employee taking the call has the right to make this decision and is empowered to tell the caller that the behaviour is unacceptable and end the call if the behaviour does not stop.

4.5 Where an individual repeatedly phones, sends emails, visits our offices, sends irrelevant documents or raises the same issues, NILGOSC may decide to:

- Only accept telephone calls from the individual at set times/ set days or arrange for only one member of staff to respond to calls or correspondence from that individual.
- Ask the individual to make an appointment to see a named member of staff before visiting our offices or request that the individual contacts NILGOSC in writing only.
- In extreme cases, advise them that further irrelevant correspondence will be destroyed.
- Take other action that NILGOSC considers appropriate, which may include legal action in extreme cases. However, NILGOSC will always let the individual know what action is being taken and why.

4.6 Where an individual continues to correspond on a wide range of issues and this action is considered excessive, NILGOSC will advise them that only a certain

number of issues will be considered in any given period and ask them to limit or focus their requests accordingly.

- 4.7 An individual with a complaint about NILGOSC services/decisions may be considered unreasonably persistent if, after all internal review mechanisms and all statutory routes of appeal have been exhausted, the member still persists in disputing the decision relating to their complaint. In such circumstances, the complainant will be advised that future contact will not be accepted and reminded of the alternative organisations that could assist with their complaint.

5. Who can Decide to Restrict Member Contact?

- 5.1 Employees who directly experience aggressive or abusive behaviour from an individual have the authority to manage that behaviour immediately in a manner they consider appropriate to the situation and in line with this policy. Employees in this situation should note the incident and pass it to their line manager for recording. If employees are uncertain about how best to proceed they should consult their line manager.
- 5.2 With the exception of such immediate decisions taken at the time of an incident, decisions to restrict contact with NILGOSC will only be taken after careful consideration of the situation in respect of an employee, by the Secretary/Deputy Secretary as appropriate. Wherever possible, the individual will be given an opportunity to modify their behaviour or actions before a final decision is taken. Individuals will be advised in writing why a decision has been made to restrict future contact, the restricted contact arrangements and, if relevant, the length of time that these restrictions will remain in place.

6. Appealing a Decision to Restrict Contact

- 6.1 Decisions to restrict contact can be appealed against and will, in terms of employees, be reviewed by the Secretary or Deputy Secretary who was not involved in the original decision. The individual will be advised of the outcome in writing – either that the restricted contact arrangements remain in place or a different course of action has been agreed.

7. Communication

- 7.1 Where written English is not the first form of communication, where applicable, NILGOSC will make reasonable arrangements to ensure that an agreed form of communication is established.

8. Recording and Reviewing a Decision to Restrict Contact

- 8.1 NILGOSC will record all incidents of unacceptable actions by members and where contact has been restricted. This will be noted in the relevant member file and/or

on appropriate computer records such as the Complaints Management System or the incident reporting system as appropriate.

- 8.2 A decision to restrict contact may be reconsidered if the individual demonstrates a more acceptable approach. The Secretary or Deputy Secretary will review the status of all individuals with restricted contact arrangements, every 3 or 6 months (depending on the nature of the restriction) and not more than 12 months after the service change or restriction was initially imposed and continued/ upheld.

9. Related Matters

- 9.1 Under section 6 of the Public Services Ombudsman Act (Northern Ireland) 2016, in certain circumstances, an authority within the Ombudsman's jurisdiction can ask the Ombudsman to investigate a complaint about itself. The Act states that such a request should only be made in the following circumstances:

- The complaint must have been made to the listed authority by a person aggrieved.
- The listed authority must have been unable to resolve the complaint.
- The complaint must relate to action taken by the listed authority.
- The complaint must relate to a matter which can be investigated.
- The procedural requirements of Section 28 of the Act must have been followed.

10. Policy Availability and Review

- 10.1 This policy is available on the NILGOSC website. We will review this policy every three years to ensure that the aims of the policy are being achieved.