



**IPSWICH**  
BOROUGH COUNCIL

# **Managing Unacceptable Behaviour Policy**

**July 2025**

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## 1. INTRODUCTION

This policy outlines Ipswich Borough Council's approach to the few people who come into contact with the Council, whose behaviour is considered unacceptable. This policy aims to ensure that our resources are used efficiently, and that employees and customers do not suffer unwarranted stress.

The Council's Corporate Complaints [Policy](#) and [Procedure](#) sets out how any dissatisfaction can be expressed through the appropriate and formal channels. We strongly encourage all persons to follow this process in the first instance to resolve their complaint formally.

The Policy has been written with the proposed Anti-Social Behaviour Policy – Community Safety in mind. Both policies will work to ensure the safety of Council employees, residents and customers experiencing unacceptable or antisocial behaviour.

## 2. POLICY OVERVIEW

The Council recognises that people may sometimes act out of character in times of stress, anxiety, or distress, and will make reasonable allowances for this. However, we consider unreasonable contact or demands on the Council employees or services to be unacceptable. The Council also considers certain other behaviours towards employees unacceptable. Any actions deemed as unacceptable either by persons during the process of making a formal complaint or through day-to-day interactions with our employees are covered by this policy.

### 2.1 REASONS FOR POLICY

On occasion, individuals using the Council's services display behaviours, actions or general conduct which can make it difficult to effectively deal with their requests or needs. If a person's conduct becomes unacceptable towards our employees or services, the Council will take action to protect our employees and customers. This policy will support the Council's employees with a consistent approach to managing these situations, establishing the principles and procedures for the recognition of, response to and treatment of unacceptable or abusive behaviour that could arise in connection with services provided by the Council.

The introduction of this policy also ensures that the Council aligns with Section 5 of both the Housing Ombudsman and Local Government and Social Care Ombudsman's Complaint Handling Codes 2024. These codes require local authorities/landlords to have a policy in place "for managing unacceptable behaviour from residents and/or their representatives" during the formal complaints process.

### 2.2 SCOPE OF POLICY

This policy applies to any individual who engages with the Council's services or whom our employees encounter, including Council tenants, private residents, contractors, or any other members of the public. The policy applies to behaviours displayed by individuals during day to day contact as well as behaviours displayed by individuals who have made a formal complaint, during the complaints process.

Contact includes:

- In person,
- Over telephone or video call,
- In writing, including by letter or email,
- On social media, or
- Indirectly (i.e. through a family member, friend or third-party).

## 2.3 EQUALITY AND DIVERSITY

Reasonable adjustments will always be considered where appropriate, but this would not negate any need to manage contact if behaviour is considered unacceptable. Housing Services also outline their own Reasonable Adjustments policy, which can be read here [Reasonable Adjustment Policy 2024.pdf](#)

## 3. DEFINING UNACCEPTABLE BEHAVIOUR

The Council appreciates that some people may be frustrated about an issue they are reporting. However, we deem behaviour unacceptable if this frustration turns into aggressive or abusive behaviour towards our employees.

The Council defines unacceptable behaviour as **the behaviour of an individual or group who, by the frequency or the nature of their contact with the Council, hinder our consideration of their or other people's concerns**. This policy defines unreasonable or persistent contact as unacceptable behaviour. Even where contact is amicable, any disproportionate demands on Council resources will be treated as unacceptable behaviour.

This policy relates to all forms of contact, both during and outside of the Council's formal complaints process. This includes when someone raises issue with a concern that has already been thoroughly investigated and determined through the Council's 2-stage complaints process, regardless of the complaint outcome (i.e. upheld, not upheld).

### 3.1 TYPES OF UNACCEPTABLE BEHAVIOUR

Both the Housing Ombudsman and the Local Government and Social Care Ombudsman have published definitions of what is perceived as unacceptable behaviour.

**The Housing Ombudsman Managing Unacceptable Behaviour Policy states:**

*A policy should clearly set out what a landlord regards as unacceptable behaviour. It should recognise that behaviour is not unacceptable just because a person is assertive or determined. There may have been distressing circumstances leading up to a customer contacting the landlord and people may act out of character. Behaviour may become unacceptable however if it is so demanding or persistent that it places unreasonable demands on the landlord and impacts the level of service that can be offered to others.*

Section 3 of the policy statement, item 3.2 outlines the following behaviours that are unacceptable or unreasonable

## **Behaviours that are unacceptable**

Examples of this type of behaviour can include:

- behaviour or language (verbal or written) that may cause employees to feel offended, afraid, threatened, or abused
- derogatory or discriminatory remarks; including racist, sexist, disablist, homophobic, or transphobic comments
- using insulting or degrading language
- making serious allegations against us or others without any evidence
- publishing information about employees online including social media
- recording and publishing telephone discussions with employees that are taken without their consent
- contacting employees using their personal details or social media presence such as Facebook, Instagram, X or LinkedIn

## **Unreasonable demands**

Examples of these type of demands can include:

- repeatedly demanding a response within a timescale outside of normal timescale agreements
- insisting on, or refusing to speak to employees when that is not possible
- repeatedly changing the substance of a complaint or raising unrelated concerns
- refusing to accept a decision where explanations for the decision have been given
- refusing to co-operate by not providing information we request to allow us to help resolve the issue

## **Unreasonable levels of contact**

Examples of this type of contact can include:

- repeated contact whilst a complaint is being progressed or after it is closed
- lengthy telephone calls repeating the same points for discussion
- high volumes of information provided by email, webform, or post where the information repeats what has already been given
- copying our employees into emails with other parties where this is not necessary

## **The Local Government and Housing Ombudsman provides the following guidance**

- Being abusive, threatening or acting in a manner intended to intimidate staff. This includes any use of racist, sexist, homophobic or other discriminatory language.
- Putting, or threatening to put information on social media or websites which includes personal information of an organisation's employees without their consent and/or making defamatory statements about employees online.
- Making excessive demands on the time and resources of staff with lengthy phone calls, emails to numerous council staff, or detailed correspondence every few days or more often, and expecting immediate responses.
- Submitting repeat contacts or complaints with minor additions/variations which the complainant insists make these 'new' complaints.
- Refusing to specify the grounds of a complaint, despite offers of help.
- Refusing to cooperate with the complaint's investigation process. For example, failing to provide information requested that is important for the investigation.

- Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice.
- Making unjustified complaints about staff who are trying to deal with the issues, and seeking to have them replaced.
- Frequently changing the basis of the complaint as the investigation proceeds.
- Raising many detailed but unimportant questions, and insisting they are all answered.
- Providing false information and/ or submitting falsified documents from themselves or others.
- Adopting a 'scatter gun' approach: pursuing parallel complaints or contact about the same issue with various organisations.

The Council considers the instances listed by the Housing Ombudsman and the Local Government and Housing Ombudsman as key examples of unacceptable behaviour, and we have chosen to adopt them in this policy. The guidance provided not only applies to complaints raised as part of our formal two stage process but also during day-to-day interaction outside of the Council's two stage formal complaints process, with the exception of the specific instances relating to formal complaints.

### **3.2 SOCIAL MEDIA**

As outlined in the Council's Corporate Complaints Policy, complainants raising a complaint on any social media platform will be redirected to raise their complaint formally by completing the online form ([www.ipswich.gov.uk/complaints](http://www.ipswich.gov.uk/complaints)) or by email ([complaints@ipswich.gov.uk](mailto:complaints@ipswich.gov.uk)).

As referenced under the Local Government and Housing Ombudsman guidance, putting, or threatening to put information on social media or websites, which includes publishing personal information of the Council's employees without their consent and/or making defamatory statements about employees online, is considered unacceptable behaviour by any persons coming into contact with the Council either on a day-to-day basis or during the formal complaints process.

### **3.3 AUDIO OR VIDEO RECORDINGS**

Having a recording of a meeting or telephone call can be helpful for people who may struggle to recollect details of what was said or be unable to read or process written records surrounding any interactions. This guidance applies to any persons either through day-to-day contact or those who have made a formal complaint.

No one should be prevented from making their own audio or video recording in order to have a clear record of matters that were discussed. However, before any person makes a recording, the Council's employees must be advised of the intention to record interactions, their purpose for doing so and must be offered an opportunity to decline to be recorded. If the Council employee agrees to be recorded they must be allowed to listen to and view any recordings made..

Only a small number of people will misuse technology and act in a way that is unreasonable. This will be treated as unacceptable behaviour in line with this policy.

Examples of unacceptable behaviour through the misuse of technology may include:

- Recording interactions with Ipswich Borough Council employees without good reason or without their permission,
- Putting recordings online without the consent of those being recorded,
- Live broadcasting interactions without our consent, or
- Manipulating or editing recordings.

## **4. MANAGING UNREASONABLE ACTIONS**

The Council's response to unacceptable behaviour must be reasonable, proportionate and fair. Before this policy is applied, appropriate steps must have been taken to discuss the persons behaviour with them, explain why their behaviour is unacceptable, and request that they modify the way in which they approach the Council's employees. Where appropriate, we will also make informal efforts to avoid unnecessary escalation and find resolution for all parties, such as mediation.

If unacceptable behaviour of any form continues, the following steps will be taken to manage contact. These steps apply to anyone displaying unacceptable behaviour either through day-to-day contact or as part of the Council's formal complaints process. In some severe cases, it is justified to immediately restrict an individual's contact without an informal or formal warning letter as identified in section 5.1 Contact Restriction.

The relevant Officer will review full case notes to ensure an informed decision is made, prior to applying this policy. Due regard will be taken to ensure that unacceptable behaviour from individuals protected under the disability characteristic is not misinterpreted and this is managed with sensitivity.

### **4.1 STAGE ONE – INFORMAL NOTICE**

The person will be sent an informal written notice letter, stating that failure to modify their behaviour may result in restrictions being applied to their contact with the Council under this policy. The letter will be issued by the Head of Service.

Examples of behaviour shown by the person that the Council believes are unacceptable may be outlined in this letter if it is deemed to be constructive towards resolution. A copy of this policy will be sent to the person for their reference. At this stage, the Council will not take any formal action to allow opportunity for the person to reflect on and adjust their behaviour, and to reach voluntary informal agreement of appropriate contact moving forward. The letter will be sent via post or email. Should we not have the persons contact details, the letter will be hand delivered should they enter the Council's offices.

### **4.2 STAGE TWO – FORMAL WARNING**

If the person fails to adhere to the Council's informal warning, an Assistant Director will issue a formal warning written notice based on evidence. The relevant Assistant Director should consider any evidence the Council's employees have gathered before concluding on whether a formal warning is necessary or if other actions can resolve the matter. These may include:



- Exploring if the individual requires reasonable adjustments under the Equality Act 2010,
- Offering to meet with the individual to understand any concerns that may be causing them to act in an unreasonable way, and
- Offering mediation if the individual requires ongoing services from the organisation.

The formal warning will be issued in writing, either by letter or email, and will explain:

- The actions in question that the Council considers unreasonable,
- The length of time for which actions will be monitored, and
- The consequences of failure to cease unacceptable behaviour (i.e. restriction of contact).

The letter will be sent via post or email. Should we not have the persons contact details, the letter will be hand delivered should they enter the Council's offices.

## 5. RESTRICTIONS ON CONTACT

The Council will not take a blanket approach to restricting contact with our services. However, where unreasonable actions pose a significant risk to the Council's employees or relate to several different service areas, we may consider an organisation-wide restriction on contact. Any reasons for restriction on contact will be clearly explained in writing. Restrictions may include:

- Restricting contact to a specific individual officer or generic service area inbox,
- Restricting access to certain buildings or premises controlled by the Council,
- Restricting permitted contact to written only, with consideration to any agreed reasonable adjustments,
- Restricting the length and frequency of telephone calls,
- Restricting access to discretionary services,
- Placing the individuals contact on file without acknowledgement or reply where no new information has been provided, or
- Under the Local Government Association's guidance for our elected members, restricting contact with the individual's local councillor if behaviour is deemed unacceptable.

If a person has raised a formal complaint and has exhausted the Council's two stage complaints process, they will be signposted to the appropriate Ombudsman who have the power to independently review the individual's complaint and the Council's complaint handling.

Any new correspondence about matters that have been reviewed in our complaints process will be filed and not acknowledged. The same restrictions will still apply should a person display unreasonable actions, which presents a significant risk, during day-to-day interaction with our employees outside of the formal complaints process

### 5.1 STAGE THREE – CONTACT RESTRICTION

The Council's decision to restrict contact with a person is a last resort action. This should only be done after attempts of resolution and warnings have been exhausted. The decision to restrict contact will be provided in writing, this letter will be sent by the relevant Director and will explain:

- The actions in question the Council considers unreasonable,
- The length of time for which actions will be monitored, which will be up to six months at which time it will be reviewed (see 5.3)



- The extent to which contact is restricted and whether a single point of contact (SPOC) has been appointed,
- The consequences of failure to cease unacceptable behaviour,
- When, how and by whom any restrictions on contact will be reviewed,
- Confirmation the organisation has considered the decision in the light of key legislation, such as the Equality Act 2010,
- How to appeal the decision,
- How to complain during the period of restricted contact, and
- Details of the Council's Corporate Complaints Policy or, if the complaints process has been exhausted, details of the relevant Ombudsman.

The letter will be sent via post or email. Should we not have the persons contact details, the letter will be hand delivered should they enter the Council's offices.

In some severe cases, it is justified to immediately restrict an individual's contact without an informal or formal warning letter. Examples of exclusions to this policy include matters where:

- The police have been involved with the case on any occasion,
- There is significant risk to the physical and/or emotional wellbeing of our employees, or
- There have been substantiated threats of violence, terrorism, or other unacceptable behaviour.

## 5.2 APPEALING RESTRICTIONS

Individuals who have their contact restricted are entitled to appeal the decision. Appeals will be reviewed by the appropriate senior figure(s) within the applicable service area(s) and must be received in writing, either by email to [complaints@ipswich.gov.uk](mailto:complaints@ipswich.gov.uk) or by letter to:

Complaints  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

## 5.3 REVIEWING RESTRICTIONS

The Council's decision to restrict contact will be reviewed every six months by the relevant Director who imposed the restriction. They will assess the case impartially and based on evidence, such as records of recent contact from the individual. If the Council decides the restriction should remain in place, the reasons will be explained to the person in writing and, if the decision is made to lift the restricted contact, the person will be warned of the consequences if unacceptable behaviour resumes.

In some cases, restricting contact could have an adverse impact on the individual. We will mitigate any effects this restriction could have, including:

- Requiring the person to be accompanied by another person (e.g. family member or social worker) when visiting any Council building,
- Putting in place alternative visiting arrangements, such as meeting outdoors or at another non-Council venue, so long as this is suitable for the individual, or

- Facilitating video or phone calls to mitigate any risk to employees or members of the public in allowing a person to be physically present in any Council building.

## 6. RELATED LEGISLATION OR POLICY

This policy is closely related to the following internal policies, procedures, and legislation.

- Complaints Policy
- Complaints Procedure
- Secure Tenancy Agreement
- Anti-Social Behaviour Policy – Community Safety
- Equality Act 2010
- Human Rights Act 1998

## 7. STATUTORY AND REGULATORY REQUIREMENTS

This policy adheres to the following statutory and regulatory legislation, unless expressly stated.

- Housing Ombudsman Service – [Complaint Handling Code](#).
- Housing Ombudsman Service – [Managing Unacceptable Behaviour Policy Guidance Notes](#).
- Local Government and Social Care Ombudsman – [Managing unreasonable actions by complainants: A guide for organisations](#).

## 8. POLICY MONITORING AND REVIEW

This Policy will be reviewed every year to determine whether anyone has been disadvantaged, in alignment with the annual Housing Ombudsman review and/or in the event of legislative changes. A summary on cases which the policy has been applied will be reported as part of the Councils Quarterly complaints reporting process.



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