



SURREY
COUNTY COUNCIL

Managing Unreasonable Customer Behaviour Policy



Version Control Table

Version	Date	Purpose/Change	Reviewer / Authoriser
1.0	17 th March 2026	Original Policy	Surrey County Council Cabinet

1. Introduction

At Surrey County Council we are committed to treating everyone with respect and fairness. This policy is for our customers and explains what happens if someone behaves in a way that is unreasonable, persistent, or causes harm, distress, or disruption to individuals representing the Council.

We understand that dealing with the Council can sometimes be frustrating or upsetting, and we will always do our best to help. We want to make sure our staff are safe and well, so they can continue to provide you with the best possible service.

Unreasonable behaviour means actions or communication that make it harder for us to deal with your enquiry or help you. Examples are provided later in this policy.

This policy applies across all parts of the Council and follows guidance from the LGSCO to ensure fairness for all.

2. Purpose

The purpose of this policy is to explain how Surrey County Council will manage behaviour that makes it difficult for us to provide services fairly and effectively.

It aims to:

- Make clear what we mean by *unreasonable behaviour* and give examples.
- Protect the wellbeing of staff, councillors, and others who work with us, so they can continue to help all customers.
- Ensure our responses to challenging behaviour are fair, consistent, and proportionate.
- Balance the needs of the individual with our responsibility to other customers and the community.

By managing behaviour appropriately, we maintain respectful, constructive engagement while keeping services running smoothly.

3. Scope

This policy applies to anyone who contacts or interacts with Surrey County Council — including service users, complainants, third parties, and members of the public — in any way, including by phone, email, letter, online forms, social media, or in person.

This policy covers all types of requests and enquiries, including service requests, complaints, and Data Subject Access Requests (SARs). Persistent or vexatious FOI

requests are dealt with under the FOI policy. Where a request or enquiry is considered unreasonable, excessive, or made without a valid purpose, the Council may take appropriate action, including managing the contact in line with this policy or applying relevant legal exemptions under the UK General Data Protection Regulation (UK GDPR) for SARs.

Any behaviour linked to these interactions that causes disruption to services or distress to individuals representing the Council may be managed under this policy.

The following section explains what this policy means for individuals and how it may be applied.

4. What This Policy Means for You

We want to work with all residents in a respectful and constructive way. Most people who contact the Council do so appropriately and are seeking genuine support or information.

Where someone's behaviour causes harm, distress, or disruption, the Council may take steps to manage that behaviour in line with this policy. Wherever possible, we will try to resolve issues informally first and will clearly explain any decisions we make.

This policy outlines what we consider to be unreasonable behaviour and explains how the Council may respond, helping to ensure fair, consistent, and proportionate outcomes for everyone.

5. When we may use this policy

We may use this policy if:

- Someone behaves in a way that causes harm, distress, or disruption to individuals representing the Council or services.
- There is a serious incident, such as threats, abusive or violent behaviour.
- Someone misuses the complaints process or makes repeated, unfounded requests.

We will always try to resolve things informally first (see Section 10). Any decision to apply this policy will be based on clear evidence and approved by a senior manager.

a) Assessing Proportionality

Whether behaviour is considered unreasonable or disproportionate will be assessed by the relevant service, based on the context and impact. This ensures a fair, case-by-case approach with oversight from a senior manager.

b) Council-Wide Application

Where a person is formally designated as displaying unreasonable behaviour, this may apply across all Council services, not just the one initially affected. Services will coordinate to ensure a consistent and proportionate response, while still considering the individual circumstances of each case.

6. Defining Unreasonable Actions and Behaviours

This policy follows guidance from the LGSCO on “unreasonable complainant behaviour” and “unreasonably persistent complaints”. See LGSCO guidance: [Managing unreasonable actions by complainants: A guide for organisations - Local Government and Social Care Ombudsman](#)

The Council focuses on the actions and behaviours of customers or their representatives, rather than labelling individuals. Unreasonable actions are those which, because of their frequency or nature, disrupt the Council’s ability to provide services or investigate complaints properly.

Each case will be assessed on its own merits. The Council recognises that some persistence is legitimate and aims to distinguish this from behaviour that becomes unreasonable, balancing the needs of the individual with the wider public and service delivery.

7. Commitment to Staff and Representatives

Surrey County Council is committed to providing a safe, respectful environment for all individuals representing the Council.

We recognise that unreasonable or abusive behaviour from members of the public can significantly affect the wellbeing of those delivering or supporting public services. Any behaviour that causes distress, fear, or disruption, regardless of whether it meets a formal threshold, will be taken seriously.

The Council will support anyone affected and take proportionate, appropriate action in line with internal procedures. Protecting those who represent the Council helps ensure we can continue providing fair, consistent, and high-quality services to all customers.

Where contractors or partners have their own relevant policies, these may apply alongside this policy.

8. Understanding Behaviour

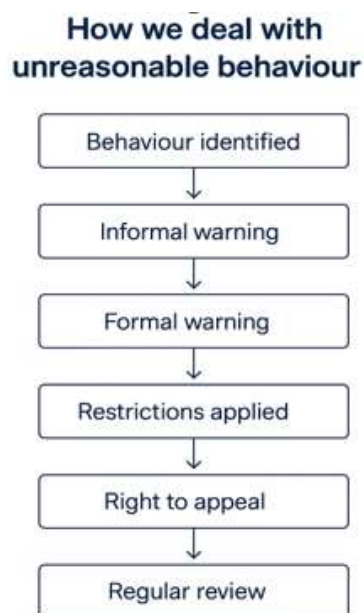
The Council recognises that people may express frustration in different ways, especially when dealing with difficult issues. What one person considers acceptable, such as raised voices or strong language, may feel distressing or intimidating to others.

Following guidance from the LGSCO, we acknowledge that there is no universal measure for when actions become unreasonable. Each case is considered individually, taking into account not only the frequency or nature of the behaviour, but also how it is experienced by individuals representing the Council. We also consider whether there may be underlying factors, such as unmet communication needs, disability, or distress, that may be influencing someone's behaviour.

This approach ensures the Council responds fairly, proportionately, and supportively, while continuing to provide services effectively to all customers.

9. How we deal with unreasonable behaviour

To make sure everyone is treated fairly, the Council follows these steps when dealing with behaviour that is persistent, unreasonable, or disruptive:



The steps we take are designed to keep services running smoothly and ensure everyone is treated fairly:

1. **Behaviour identified** – We notice behaviour that may be causing problems or disruption.
2. **Informal warning** – We explain the concern and ask for the behaviour to change.
3. **Formal warning** – If the behaviour continues, we issue a formal warning and explain the consequences.

4. **Restrictions applied** – If needed, we may limit how you can contact us to manage the situation.
5. **Right to appeal** – You can ask us to review any restrictions.
6. **Regular review** – Restrictions are reviewed at agreed times, and we let you know the outcome.

10. Early Intervention and De-escalation

Before considering restrictions, the Council encourages early engagement and de-escalation strategies. This helps to resolve issues constructively and can prevent situations from escalating to formal measures.

Key approaches include:

- Clear, respectful communication to clarify misunderstandings.
- Offering informal resolutions or mediation where appropriate.
- Involving advocacy or support services early in the process.
- Providing additional support or adjustments to help resolve issues constructively.

11. Examples of Unreasonable Behaviour

Introduction to Examples

Most people contact the Council in an appropriate way and get help or information they need. Sometimes, however, behaviour can cause distress, disruption, or make it harder for the Council to provide services.

They are provided to help you understand what actions or contact may lead the Council to apply this policy. Each situation is considered individually, and the Council will always try to resolve issues in a fair and proportionate way.

a) Threatening, Abusive or Violent Behaviour

- Using threatening, abusive, or intimidating language or behaviour.
- Using racist, sexist, homophobic, ableist, or other discriminatory language or actions.
- Harassment, verbal abuse, or personal insults, including shouting or aggressive gestures.
- Making threats of violence or harm to others These will always be taken seriously and may be reported to the police. If someone expresses thoughts of self-harm, the Council will respond with care and support.
- Sharing personal or defamatory information online, including on social media, without consent.
- Sharing offensive, indecent, or explicit images or content, whether in person or online.

b) Disruptive Contact

- Repeatedly submitting complaints or requests that are essentially the same, insisting they are new issues.
- Changing the focus of a complaint while it is being reviewed.
- Refusing to provide information needed to resolve a complaint or ignoring requests for clarification.
- Making unfounded complaints against staff to delay or obstruct resolution.
- Demanding investigations or actions that go against Council policies or procedures.
- Sending numerous detailed but irrelevant questions.
- Contacting multiple officers or departments at the same time about the same issue (“scattergun” approach).
- Continuing to demand responses after a matter has been fully addressed, or after all complaints and appeals have been considered.
- Expecting immediate responses or special treatment without allowing time for proper consideration.
- Using Freedom of Information (FOI) or Subject Access Requests (SAR) in an excessive, repetitive, or disruptive way.

c) Misuse of Technology

- Recording phone or in-person conversations with the intention of sharing or publishing them without the knowledge or consent of those involved.
- Publishing recordings of Council staff or meetings without permission.
- Broadcasting live interactions with the Council without consent.
- Editing or manipulating recordings to misrepresent what was said or done.
- Using fake or anonymous online accounts to target staff or bypass restrictions.

12. Managing Unreasonable Behaviour

The Council has a zero-tolerance approach to violence, threats, or abusive behaviour towards anyone representing the Council. Serious incidents will always be reported to the police.

We aim to manage unreasonable behaviour through clear communication, fair warnings, and proportionate action. Expectations will be explained in plain language. Where appropriate, reasonable adjustments will be considered on a case-by-case basis. These adjustments might include additional support for people with disabilities, neurodivergent conditions, language needs, or other protected characteristics. Adjustments are intended to help people engage fairly and respectfully, but they do not excuse abusive, threatening, or otherwise unacceptable behaviour.

Everyone is expected to communicate respectfully and appropriately. Support will be provided where it is needed to help individuals meet these expectations.

Before any restrictions on communication are applied, the Council will inform the individual that their behaviour is considered unreasonable and request that they modify it. The individual will be clearly advised of the potential consequences if the behaviour continues.

If the behaviour persists, the Council may consider applying contact restrictions. These decisions are made carefully and proportionately, based on the nature and impact of the behaviour. Details of the possible restrictions and how they may be applied are outlined in next section (*Section 13 – Options to Restrict Contact*).

13. Options to Restrict Contact

If someone's behaviour is assessed as unreasonable and previous attempts to address it (*see Section 12 – Managing Unreasonable Behaviour*) have not worked, the Council may introduce proportionate restrictions on how contact takes place.

Any restrictions will be based on the nature, severity, and impact of the behaviour, and will be applied in a way that meets the Council's legal duties, including those under the Equality Act 2010.

Possible restrictions include:

- Asking the person to contact the Council through a single named officer or team.
- Limiting communication to a specific method, such as email or letter.
- Placing limits on how often contact can be made within a set period.
- Temporarily stopping direct contact if there is a risk to staff safety or wellbeing.

All restrictions will:

- Be explained clearly in writing.
- Be proportionate to the behaviour.
- Be reviewed regularly to check they are still needed (*see Section 17 for review details*).

Full details of the types of restrictions that may be used are provided in *Section 15 – Types of Contact Restrictions*.

14. Types of Contact Restrictions

To ensure fairness, restrictions are grouped into two levels:

a) Initial Restrictions

These are intended to manage disruption while still allowing reasonable access and communication where possible:

- **Single Point of Contact (SPOC)** – Directing all communication to one named officer or team for consistency and efficiency. (*all communication is directed to one mailbox to provide consistency and reduce staff burden*).
- **Limited Contact Channels** – Restricting contact to written communication, email only, or phone calls at set times.
- **Contact Schedule Limits** – Restricting the days, frequency, or times the individual may contact the Council.
- **Issue-Based Restrictions** – We will only respond to specific topics, such as an ongoing complaint or a particular service you are using. Other matters outside these topics may not receive a response.
- **Clarification Requirements** – Asking the individual to clearly set out their concerns in writing before further correspondence.
- **Voluntary Third-Party Involvement** – Suggesting the use of an advocate or representative (e.g., Citizens Advice) to help structure contact constructively.
- **FOI or SAR requests Limits** – Applying limits where requests are clearly unreasonable, repeated, or made to cause disruption.

b) Escalated Restrictions

These restrictions will be used when soft measures are ignored, or the behaviour poses serious risk:

- **Ending Contact Immediately** – Calls or meetings may be ended if abusive or threatening behaviour continues, followed by a written warning.
- **Blocking Communication Channels** – In exceptional cases, where individuals continue to send excessive, abusive, or defamatory content – despite previous warnings or restrictions – the Council may block specific communication channels (e.g. email addresses or social media accounts) to protect staff. Alternative contact methods, such as through a Single Point of Contact, will be maintained to ensure the individual can still access essential services.
- **No Further Contact on Closed Issues** – Stating that no further response will be provided on a closed matter unless significant new information is given.
- **Exclusion from Premises or Meetings** – Physical exclusion for safety or harassment concerns.
- **Legal or Enforcement Action** – In cases of serious threats, harassment, or defamation, the Council may involve the police or seek legal remedies.
- **Refusal of Further FOI/SAR Requests** – Applying legal exemptions where requests are clearly vexatious or manifestly unfounded.

15. Procedure for Imposing Restrictions

The Council will always try to resolve issues informally first. If behaviour continues to be unreasonable, restrictions may be applied. All restrictions will be clearly explained in writing, including:

- The reason for the restriction.
- How long the restriction will last.
- How the individual can appeal or request a review, (with support available where needed to ensure the process is accessible).

Duration and Review:

Restrictions are temporary and typically last between 30 and 90 days, depending on the circumstances.

They will be reviewed regularly to decide whether they should be lifted, extended, or modified based on the individual's behaviour and any new information.

16. Monitoring and Review

Any restriction will be monitored and reviewed by the service that applied it. Restrictions are time limited and will be reviewed at regular intervals.

Corporate Customer Relations Team Oversight

The Corporate Customer Relations team may become involved in oversight, particularly where:

- The behaviour affects multiple Council services.
- There is a serious risk to staff or the public.
- An appeal or complaint is raised about the restriction.

All restrictions will be reviewed to determine if they remain necessary and proportionate.

17. Right of Appeal

If contact restrictions have been applied to you, you have the right to appeal the decision. This means you can ask for the decision to be reviewed if you disagree with it or want to provide additional information.

The Council is committed to making the appeal process fair, transparent, and accessible. Support is available to help you understand the process and submit your appeal if needed.

Who can appeal:

- The individual subject to contact restrictions.
- Their authorised representative.

How to submit an appeal:

- The restriction decision letter will include details of how and who to contact to submit your appeal.
- Appeals must be submitted in writing within 20 working days of receiving the restriction decision letter.
- Your appeal should clearly explain why you disagree with the decision and include any relevant evidence or information.

Who reviews the Appeal:

- The appeal will be reviewed by a director officer who was not involved in the original decision, ensuring impartiality.
- The name and contact details of this officer will be provided in the appeal acknowledgement letter.

Timeframes for Appeals

- After we receive your appeal, we will send you a written acknowledgement.
- We aim to provide a decision within 20 working days of acknowledging it.
- If your appeal is complex or requires further investigation, we will inform you of any delays and give you a revised timeframe.

Outcome of the Appeal:

Once a decision has been made, you will receive a written outcome letter explaining whether the restriction will stay the same, be changed, or removed. It will also outline any further actions or reviews.

During the appeal, current restrictions usually stay in effect unless the reviewer decides otherwise.

If you remain dissatisfied, the letter will provide information on contacting the LGSCO.

18. Review of Restrictions and Future Contact

All contact restrictions will be reviewed regularly to ensure they remain necessary, proportionate, and fair.

Review Period:

- Reviews will usually take place at the end of the set restriction period, or sooner if there is evidence that the individual's behaviour has changed or improved.
- All restrictions, including Single Point of Contact (SPOC) arrangements, will be reviewed at least every 6 months, regardless of whether the standard review period has been reached. This 6-month review period is in line with LGSCO guidance on ensuring that restrictions are regularly reviewed and that any extensions are justified and documented.
- Any new information that could affect the circumstances may also trigger a review.
- Reviews and decisions about whether restrictions should continue, be amended, or removed will be led by the Lead Customer Relations Manager (or equivalent) in consultation with the relevant Service Director.

What the Review Will Consider:

- Whether the behaviour that led to the restriction has stopped or significantly reduced.
- Any new or relevant circumstances, e.g., health, support needs, personal issues.
- Ongoing impact on staff, Councillors, or service delivery.

Review Outcome:

Following the review, the Council may decide to:

- Remove the restriction if it is no longer justified.
- Amend the restriction, (e.g., reduce or adjust communication limits).
- Extend the restriction for a further period

All review decisions will be communicated in writing, including reasons and any ongoing requirements, and support will be provided as needed for accessibility.

19. New Complaints from Individuals Subject to Restrictions

The Council will consider each new complaint on its own merits, whether made by an individual with current restrictions or by someone previously subject to them.

- If the new complaint is unrelated to the behaviour that led to restrictions and is made reasonably, it will be handled through the standard complaints process.

- If the individual is subject to current restrictions, the complaint will be managed within those parameters (e.g. via a Single Point of Contact or limited contact channels).
- If unreasonable behaviour occurs again, the Council may consider applying new or extended restrictions following a careful review.

20. Recording and Sharing Information

The Council will maintain clear and accurate records of any contact restrictions applied. These records are stored securely in accordance with data protection laws and shared only with staff who need the information to carry out their duties.

21. Referral to the Ombudsman or Information Commissioner

The Council is committed to openness and accountability. If you are not satisfied with how we have handled a service or complaint, you have the right to escalate your concerns:

- For issues regarding our services or complaints, you can contact the LGSCO.
- For concerns about data protection or your information rights, you can contact the Information Commissioner's Office (ICO).

In rare cases where the relationship breaks down, the Council may suggest referring the matter directly to the LGSCO or another independent body, even if the internal process is not complete. Contact details for these bodies will be provided in the complaint's procedure.

22. Legal Rights and Information Requests

Being subject to contact restrictions under this policy does not affect your legal rights. You continue to have the right to:

- Submit new Freedom of Information (FOI) requests
- Make new Subject Access Requests (SARs)
- Request corrections or deletion of your personal data
- Request environmental information
- Submit new complaints that are not repeats of previously resolved issues
- Contact external bodies such as the ICO or the LGSCO.

All requests will be handled in accordance with relevant laws, guidance, and the Council's standard procedures.

23. Support for Staff

The Council is committed to protecting the safety and wellbeing of its employees and elected members. When managing unreasonable behaviour, staff will be supported through appropriate internal procedures, including:

- Guidance and support from line management
- Health and safety advice
- Wellbeing resources, such as the Employee Assistance Programme (EAP)

These measures help ensure the Council maintains a safe and professional working environment while continuing to deliver fair and effective services to all residents.

24. Equality and Accessibility

The Council will make reasonable adjustments to support people with disabilities, neurodiverse conditions, or other needs.

- Consider support needs and communication preferences.
- Ensure decisions are fair and non-discriminatory.
- Persistent abusive or disruptive behaviour will be managed carefully, balancing staff protection with Equality Act responsibilities.

25. Policy Review

This policy will be reviewed every two years, or sooner if there are changes to relevant legislation, Council policies, procedures, or partnership agreements.