

CUSTOMER COMPLAINTS POLICY

**MANAGING UNREASONABLE CUSTOMER
DEMANDS**

Customer Complaints Policy: Managing Unreasonable Customer Demands

Document control			
Title	Customer Complaints Policy: Managing Unreasonable Customer Demands		
Owner	Chief Officer (Legal, Democratic and Strategy)	Contact	cemanagementsupport@northlan.gov.uk
Governance Group	Policy and Strategy Committee		
Author	Strategy and Engagement	Contact	complaintsappeals@northlan.gov.uk

Revision History			
Number	Originator	Date Review Commenced	Revision description/record of change
1.0	Corporate Management Team	May 2025	n/a, new policy

Document Approvals			
Number	Governance Group	Date approval granted	Date approval to be requested (if document still draft)
1.0	Policy and Strategy committee	24/09/2025	

Consultation Record (for most recent update)	
Status of document consulted upon	V1.0
Stakeholders consulted/date	Engagement on draft version with Corporate Management Team on 16/05/25. V1.0 reviewed by the Corporate Management Team on 15/08/25 in line with their strategic oversight and management role and endorsed for submission to the Policy and Strategy Committee for formal approval of policy. Approved by Policy and Strategy Committee – 24/09/25

Strategic Alignment
The Plan for North Lanarkshire.

Next review date	
Review Date	August 2026

Customer Complaints Policy: Managing Unreasonable Customer Demands

Contents	Page Number
1. Purpose	4
2. Policy Objectives	4
3. Unreasonable Customer Actions	5
4. Unreasonable Customer Demands	6
5. Impact on Service Operations	6
6. Unreasonable use of the Complaints Procedure	7
7. Managing Unreasonable Customer Actions	7
8. Restricting Contact	8
9. Managing Unreasonable Customer Demands in Child Friendly Complaints	9
10. Policy Concluding Statement	10

1. Purpose

This policy addresses unreasonable customer demands in the context of customer complaints. The Council is committed to fostering a safe, respectful, and an inclusive environment for both customers and staff. To support this commitment, we adopt a zero-tolerance approach to unreasonable behaviour, which is defined under three key categories:

- Aggressive or abusive behaviour
- Unreasonable demands
- Unreasonable persistence

The policy clearly defines what constitutes unreasonable actions and outlines the potential consequences, including the possibility of restricting or modifying access to council services. It also acknowledges that people may act out of character due to distressing circumstances but aims to address behaviour that places undue strain on Council resources or staff.

The policy further considers the specific implications in relation to managing unreasonable customer demands in Child-Friendly Complaints Processes. This approach is aligned with our statutory obligations under the UN Convention of Rights of a Child (UNCRC) and reflects best practice set out by the Scottish Public Services Ombudsman (SPSO).

2. Policy Objectives

Fairness and Respect:

We are committed to treating all customers with fairness, honesty, and consistency. While every customer has the right to be heard and respected, our staff are entitled to the same treatment.

Accessibility and Limitations:

We strive to remain accessible to all customers. However, when actions become unreasonable, we may restrict or modify access to our services.

Protection for Others:

We ensure that neither other customers nor Council staff are negatively impacted by disruptive behaviour.

Managing Disruptions:

Persistent and vexatious complaints can strain Council resources. This policy addresses their consequences to maintain service efficiency.

Support for Staff:

Our framework provides employees with clear guidance on handling these situations effectively and consistently.

Trauma Informed:

The policy reflects the Council's commitment to the national goal of embedding the trauma-informed principles of – Trust, Safety, Choice, Collaboration and Empowerment across all areas of our work. It aims to ensure that our policies, procedures, and practices are shaped by an understanding of trauma and are responsive to its impact. ([Creating Trauma-Informed and Responsive Change - Appendix B](#)).

Child Friendly:

The Council remains fully committed to supporting the rights of children and young people to express concerns and participate in decisions affecting them, in line with the United Nations Convention on the Rights of a Child (UNCRC). Our complaints process is designed to be accessible and inclusive, for children, while also offering appropriate support for adults acting on their behalf. The policy recognises that children and young people have the right to be heard and to have their views taken seriously, especially when raising concerns about services that affect them.

3. Unreasonable Customer Actions

We recognise that customers may experience distress and frustration, leading to heightened emotions. While assertiveness is acceptable, behaviours that are aggressive, demanding, obsessive, prolific, repetitive, harassing, or persistently unreasonable may place excessive strain on our resources or result in unreasonable treatment of staff. Such actions are managed under this policy.

Categories of Unreasonable Behaviour

1. Aggressive or Abusive Conduct

- Includes physical violence, verbal abuse, intimidation, harassment, or discriminatory remarks.
- Example behaviours: shouting, swearing, making personal threats, or using intimidating body language.

2. Unreasonable Demands

- Involves excessive requests that disproportionately strain resources or staff.
- Example behaviours: demanding immediate responses to non-urgent requests, requesting repeated exceptions to policies, or making excessive contact across multiple services.

3. Unreasonable Persistence

- Occurs when customers continue to engage in unproductive, repetitive actions despite prior explanations or resolutions.
- Example behaviours: repeatedly raising the same issue after a resolution, refusing to accept final decisions, or contacting multiple staff to seek escalation.

4. Unreasonable Customer Demands

While we strive to accommodate reasonable customer needs, demands become unreasonable when they impede our ability to assist others, provide essential services, or equitably allocate staff resources.

Examples of Unreasonable Demands

Actions that fall into this category may include:

- Insisting on responses within an unrealistic timeframe.
- Demanding direct access to specific staff without valid justification.
- Submitting excessive and/or repeated communications (e.g., repeated calls, letters, emails, Freedom of Information (FOI), or Subject Access Requests). FOI Vexatious requests provide the basis for an exemption in relation to requests under the Freedom of Information (Scotland) Act).
- Repeatedly raising concerns that have already been addressed or resolved.
- Fixating on minor issues and exaggerating their significance.
- Refusing to accept documented evidence or explanations.
- Challenging decisions continuously without presenting new information.
- Raising concerns through proxies when the primary customer does not have a direct grievance.

5. Impact on Service Operations

Unreasonable behaviour places undue pressure on service resources, causing delays, disrupting workflows, and limiting equitable service provision.

Response Strategy

To address unreasonable demands, we may implement:

- Limiting contact methods or frequency, in some instances we may stop all contact.
- Assigning a single point of contact.
- Providing clear timelines for responses.
- Referring complaints to alternative processes where appropriate.
- Taking steps to protect staff well-being.

6. Unreasonable Use of the Complaints Procedure

Managing Persistent Complaints

Some customers may struggle to accept our decisions, continuing to challenge them despite clear explanations.

Examples of this behaviour include:

- Refusing to accept a decision after appropriate review.
- Rejecting reasonable explanations regarding service limitations.
- Repeatedly raising the same issue without new information.

If a formal complaint has been submitted via our Complaints Handling Procedure, customers will be informed at Stage 2 that, if dissatisfied, they may escalate their complaint to the Scottish Public Services Ombudsman (SPSO). At this point, the Council will consider the matter closed.

If all internal review processes have been exhausted and a customer continues disputing a decision without new evidence, they will be notified that:

- Future phone calls and meetings regarding the issue will not be accepted.
- Further communication must be in writing, with responses provided only if significant new information arises.

7. Managing Unreasonable Customer Actions

Most customers engage with us respectfully. However, in rare cases, unreasonable behaviour may require restrictions. While we strive to ensure complaints can progress appropriately, we may limit communication methods if interactions disrupt services.

Potential Contact Restrictions

- Designating a single staff member for all interaction.
- Setting specific times and days for telephone communication.
- Requiring appointments for office visits.
- Restricting all contact to written correspondence.
- Refusing to acknowledge abusive communications.

- Returning irrelevant documents or discarding them in extreme cases.
- If a customer continues engaging in excessive or unfocused issues, they may be asked to limit or prioritise their requests within a set timeframe.

Extreme Cases

In rare situations, a customer may be placed on a 'no personal contact' list, requiring all communication to go through Chief Officers. Or we may choose to stop all contact with customers.

8. Restricting Contact

8.1 Deciding to Restrict Contact

Restrictions are imposed based on the severity of the behaviour and its impact on services.

Customers subject to contact restrictions have the right to appeal within 20 working days. Appeals are considered only in relation to the restriction itself - not the original complaint.

8.2 Appealing a Contact Restriction

8.2.1 Appeal Process

Customers subject to contact restrictions have the right to appeal within 20 working days. Appeals are considered only in relation to the restriction itself - not the original complaint.

Grounds for Appeal

- Incorrect identification of actions as unreasonable.
- Disproportionate restrictions exceeding reasonable limits.
- Personal circumstances making restrictions particularly challenging.

Review Process

- The relevant Chief Officer will review the appeal independently. They may uphold, adjust, or remove restrictions as necessary. If dissatisfied, customers may escalate concerns to the Scottish Public Services Ombudsman (SPSO). This marks the final stage of the complaint appeals process.

Reviewing Restrictions

- Restrictions may be reviewed after a six-month period to assess their ongoing necessity.

9. Managing Unreasonable Customer Demands in Child Friendly Complaints

The Council remains fully committed to supporting the rights of children and young people to express concerns and participate in decisions affecting them, in line with the United Nations Convention on the Rights of a Child (UNCRC).

Our complaints process is designed to be accessible and inclusive, for children, while also offering appropriate support for adults acting on their behalf.

The Council recognises that many complaints involving children are raised by parents, carers, or advocates with genuine concern and good intentions. However, there are occasions where behaviours exhibited during the complaints process may be considered unreasonable, particularly when they compromise the interests of the child, place undue pressure on staff, or disrupt the functioning of services.

In line with the Council's zero-tolerance approach, we recognise that children and young people have the right to be heard and to have their views taken seriously, especially when raising concerns about services that affect them.

However, when complaints are made on behalf of children, we sometimes encounter adult behaviours that:

- Stop the child from sharing their own views.
- Make the problem seem bigger than it is, saying it's for the child.
- Use the child's complaint to pursue unrelated grievances.
- Refuse to let the child take part, even when it's okay for them to do so.
- Want to use complicated ways that aren't child-friendly (like not accepting simple language or easy steps).
- Ask for things the Council cannot do or that are not part of the complaints process.
- Persistently raising the same issue, even after it's been answered, without anything new to add.

We will take appropriate steps to ensure that our complaints process is easy for children to use, respectful, and always puts their best interests first while also protecting our staff and services.

If a Complaint involves a child, we will:

Listen and explain

- We will listen carefully and explain how the complaints process works. We will also help adults support children to speak for themselves when they can.

Focus on the child

- If it's right to do so, we will talk directly with the child and make sure their views are taken seriously.

Help adults help children

- We will guide parents, carers, or others so they can support the child in a kind and respectful way.

Set clear rules

- We will explain what behaviour is acceptable and what the complaints process can and cannot do.

Apply proportionate restrictions

- If an adult's behaviour becomes aggressive, demanding, or persistently unreasonable, such as:
 - restricting contact, modifying communication channels, if conduct remains unreasonable despite engagement efforts.

10. Policy Concluding Statement

We are committed to giving all our customers a high level of service. However, we also have a responsibility to keep our staff and customers safe, respected, and treated with dignity. This policy makes sure that every complaint is taken seriously and handled fairly. At the same time, it sets clear limits on behaviour that is unreasonable or unacceptable.

By including trauma-informed and child-friendly approaches, we aim to make our complaints process easy to use, and respectful to everyone. We will continue to review and improve our practices to ensure our staff and customers feel supported and treated fairly.