



Managing Unreasonable Behaviour and Contact Policy

1. Purpose

Kent & Essex IFCA is committed to providing accessible, fair, and professional services to all stakeholders, including commercial fishers, recreational sea anglers, marine users, businesses, partner organisations, and members of the public.

The Authority welcomes feedback, challenges, complaints, and scrutiny of its decisions and activities. Stakeholders have a right to express concerns, make complaints, and challenge decisions through the appropriate channels.

However, in a small number of cases, the actions or behaviour of individuals may become unreasonable. Such actions can have a significant impact on staff wellbeing, divert resources from statutory functions, and affect the Authority's ability to provide services to others. This policy sets out how Kent & Essex IFCA will respond proportionately and consistently to such situations

2. Principles

This policy is based on the following principles:

- All stakeholders will be treated with fairness, dignity, and respect.
- Access to IFCA services will not be restricted without good reason.
- Concerns, complaints, and challenges will be considered on their merits.
- A stakeholder may have a legitimate concern but express it in an unreasonable manner.
- Any restrictions imposed will be proportionate to the circumstances.
- Decisions will take account of individual circumstances, including any vulnerabilities, disabilities, or communication needs.
- The Authority has a duty to protect staff, Members, and representatives from abuse, harassment, threats, and unreasonable demands

3. Scope

This policy applies to all interactions between external stakeholders and Kent & Essex IFCA.

4. What Is Unreasonable Behaviour or Contact?

Kent & Essex IFCA recognises that people may act out of character when they are frustrated, anxious, or concerned about an issue.

Being persistent, determined, or strongly expressing disagreement does not, by itself, amount to unreasonable behaviour.

Behaviour is likely to be considered unreasonable where it has a disproportionate impact on staff, Authority resources, or the Authority's ability to provide services effectively.

5. Examples of Unreasonable Behaviour

Examples may include, but are not limited to:

Aggressive or Abusive Behaviour

- Threats of violence or intimidation.
- Verbal abuse.
- Personal insults directed at staff or Members.
- Offensive, discriminatory, or derogatory remarks.
- Shouting, aggressive gestures, or confrontational conduct.

Harassment

- Repeated unwanted contact with individual officers.
- Targeting specific members of staff.
- Attempts to undermine, embarrass, or intimidate employees.
- Posting abusive comments about staff online.

Unreasonable Demands

- Insisting on responses within unrealistic timescales.
- Demanding outcomes outside the Authority's powers.
- Repeatedly contacting multiple officers about the same issue.
- Refusing to accept that a matter has been fully considered.

Unreasonable Persistence

- Continually raising substantially the same issue after all processes have been exhausted.
- Making excessive volumes of correspondence that add no significant new information.
- Repeatedly seeking to reopen matters that have been properly concluded.

6. Behaviour That Will Not Normally Be Considered Unreasonable

The Authority recognises that the following do not automatically constitute unreasonable behaviour:

- Making a complaint.
- Escalating a complaint through the appropriate process.
- Seeking clarification of a decision.
- Expressing dissatisfaction.
- Being upset, frustrated, or emotional.
- Using advocacy or representation.

The Authority will distinguish between a person's complaint and their behaviour when deciding whether this policy should apply.

7. Managing Unreasonable Behaviour

Where possible, Kent & Essex IFCA will seek to resolve issues informally before applying any restrictions.

This may include:

- Explaining why behaviour is causing concern.
- Requesting that behaviour changes.
- Clarifying expected standards of communication.
- Offering alternative methods of engagement.

Where the behaviour continues, proportionate restrictions may be applied

8. Possible Restrictions

Depending on the circumstances, Kent & Essex IFCA may:

- Require communication to be made in writing only.

- Require communication through a single nominated officer.
- Limit the frequency of contact.
- Decline to respond to repetitive correspondence that raises no new issues.
- Restrict attendance at meetings where previous behaviour has caused concern.
- Terminate telephone calls where abuse or threats occur.
- End meetings if behaviour becomes unacceptable.
- Exclude individuals from IFCA premises where necessary to protect staff safety.
- Refer matters to the police where criminal offences may have occurred.

Any restrictions will be proportionate and tailored to the circumstances of the case.

9. Decision Making

Any decision to apply restrictions under this policy will normally be made by:

- The Chief Officer; or
- The Chairman of the Authority.

The decision will consider:

- The nature of the behaviour.
- The frequency and impact of the behaviour.
- Any personal circumstances or vulnerabilities.
- The need to protect staff wellbeing and public resources.
- Whether alternative approaches have been attempted.

10. Notification

Where restrictions are imposed, the individual will normally be informed in writing of:

- The reasons for the decision.
- The restrictions being applied.
- The duration of the restrictions.
- How the decision may be reviewed.

Immediate action may be taken without prior warning where staff safety is at risk.

11. Review of Restrictions

Restrictions will not normally remain in place indefinitely.

The Authority will review restrictions periodically, normally after 6 to 12 months, to determine whether they remain necessary and proportionate.

The individual may request a review of the decision by writing to the Chief Officer.

12. Record Keeping

The Authority will maintain records of:

- Incidents.
- Correspondence.
- Decisions made under this policy.
- Reviews of restrictions.

Records will be managed in accordance with data protection legislation and the Authority's records management procedures.

13. Responsibilities

Stakeholders

Stakeholders are expected to:

- Treat IFCA staff and representatives with courtesy and respect.
- Follow lawful instructions from authorised officers.
- Communicate appropriately and professionally.

Kent & Essex IFCA

The Authority will:

- Consider all concerns fairly.
- Apply this policy consistently and proportionately.
- Balance access to services with the need to protect staff wellbeing.
- Ensure restrictions are evidence-based and regularly reviewed.

14. Review

Policy Owner: Chief Officer
Approved By: Kent & Essex IFCA Authority

Effective Date:

Review Date:

Version: 1.0

This policy is informed by the Local Government and Social Care Ombudsman's guidance "Managing Unreasonable Actions by Complainants" (updated April 2024) and reflects principles of fairness, proportionality, and continued access to public services wherever possible.