



FRAMFIELD

PARISH COUNCIL

MANAGING VEXATIOUS COMPLAINANTS AND REQUESTS POLICY

**A policy for managing persistent, vexatious, aggressive or
abusive behaviour, complaints and requests**

ADOPTED July 2026

Introduction

Framfield Parish Council is committed to providing accessible, fair and proportionate procedures for dealing with complaints and correspondence from residents and members of the public.

The Council recognises that most complaints are made in good faith and should be handled courteously and professionally.

The Council will not permit its complaints procedures, correspondence channels, meetings, social media presence, or officer and councillor contact details to be used in a way that harasses, intimidates, abuses, defames, overwhelms or unfairly targets staff, councillors or others acting on behalf of the Council.

The right to complain, challenge or disagree with the Council does not include a right to behave unreasonably, to pursue individuals personally, to consume disproportionate public resources, or to continue pursuing matters which have already been properly considered.

A small minority of complainants may engage in behaviour that is vexatious, persistent, aggressive, abusive or otherwise unreasonable. Such behaviour can place an unreasonable burden on Council resources, disrupt Council business, and cause distress to staff, councillors or others acting on behalf of the Council.

This policy identifies situations where an individual complainant, group of complainants, or associated persons may be considered to be acting in an unreasonable, persistent, aggressive, abusive or vexatious manner, and sets out the action the Council may take in such circumstances.

The Council remains committed to treating all complainants fairly, proportionately and without discrimination. However, that commitment must be balanced with the Council's duty to protect the wellbeing of staff, councillors and others acting on behalf of the Council, and to ensure the effective use of public resources.

1. Protection of staff and councillors

The Council has a duty of care to protect its staff and elected members from harassment, intimidation, abusive behaviour and unreasonable conduct.

The Council will not tolerate behaviour that threatens the safety, wellbeing or reputation of its staff or councillors.

Where behaviour is threatening, abusive, defamatory, harassing or otherwise seriously disruptive, the Council may take immediate action under this policy and may seek legal advice, refer the matter to the police, or take other appropriate action where necessary.

2. Responsibility for administering the policy

The Parish Clerk is normally responsible for administering this policy on behalf of the Council. The Chairman may also acknowledge, manage and respond to complaints or correspondence on behalf of the Council, whether acting alongside the Clerk or as the Council's designated point of contact. References in this policy to action or a response by the Clerk do not prevent the Chairman from acting or responding where appropriate.

However, where:

- the Clerk is the subject of the complaint, correspondence or behaviour in question, or
- the Clerk reasonably considers that managing the matter personally would expose them to further harassment, intimidation or conflict, or
- the behaviour is directed towards the Clerk in a manner that makes it inappropriate for the Clerk to manage the process

responsibility for administering this policy may be exercised by the Chairman of the Council, or in their absence the Vice-Chairman.

In such circumstances the Chairman may issue warnings or reminders, impose restrictions, manage contact arrangements and take other action under this policy on behalf of the Council in order to protect the Clerk and ensure the policy is properly administered.

Any such action will be reported to the next appropriate meeting of Full Council for governance purposes.

3. Protection of wellbeing and Council business

The Council's first priority when applying this policy will be the safety, dignity and wellbeing of its staff, councillors and those acting on behalf of the Council.

No member of staff, councillor, volunteer or Council representative is required to tolerate conduct which is abusive, intimidating, harassing, defamatory, threatening, personally targeted, persistently disruptive, or otherwise unreasonable.

The Council may take protective action where the behaviour of a complainant, correspondent, group of complainants, or any person acting in concert with them, is having, or is likely to have, an adverse effect on:

- the wellbeing of staff or councillors
- the effective administration of Council business
- the Council's ability to serve the wider community
- the proper use of public resources
- the reputation, dignity or safety of any person acting on behalf of the Council

Protective action under this policy is not a punishment. It is a proportionate administrative step intended to manage unreasonable conduct, protect individuals, and ensure that Council resources remain available for legitimate Council business.

Where the Chairman, or in their absence the Vice-Chairman, reasonably considers that continued direct contact with the Clerk, councillors or other Council representatives would be inappropriate, harmful, disruptive or likely to escalate matters, the Chairman or Vice-Chairman may require that all future contact is directed only through a named person, designated email address, postal address, solicitor, third party representative, or other channel specified by the Council.

Where such a restriction is imposed, the complainant will not be entitled to choose an alternative route of contact, require a response from a particular officer or councillor, or insist that individual councillors, the Clerk or other Council representatives engage with them directly.

The Chairman, or in their absence the Vice-Chairman, may act as the Council's designated point of contact, or may nominate another councillor, officer, solicitor or other appropriate person to act in that capacity. The designated contact may receive, filter, acknowledge, decline, summarise or respond to communications as they consider appropriate on behalf of the Council.

Correspondence sent outside the designated contact route may be read, retained for record purposes, referred to the appropriate authority, or disregarded without acknowledgement or substantive response.

The Council may also decide that abusive, repetitive, defamatory, harassing or otherwise unreasonable material will not be circulated to councillors or staff, except where necessary for governance, legal, safeguarding, evidential or decision-making purposes.

4. Delegated authority and procedural challenges

Decisions under this policy may be taken by the Clerk, the Chairman, or the Vice-Chairman in accordance with this policy, having regard to the circumstances at the time and the need to protect staff, councillors and Council business.

Where urgent action is required to protect wellbeing, prevent further harassment, reduce distress or avoid disruption to Council business, the Chairman or Vice-Chairman may impose interim restrictions with immediate effect. Such restrictions will be reported to the next appropriate meeting of Full Council, or to a properly authorised committee, for noting, review or confirmation.

The Council will aim to act fairly, reasonably and proportionately when applying this policy. However, a minor procedural defect, administrative error, omission, delay, incorrect cross-reference, or departure from the normal staged process will not of itself invalidate action taken under this policy, provided the Council has acted in good faith and the action taken is reasonable and proportionate in the circumstances.

No complainant shall be entitled to frustrate, delay or invalidate the application of this policy by raising repetitive procedural objections, demanding responses from particular individuals, refusing to use the designated contact route, or attempting to re-open matters already considered by the Council.

Where a complainant raises a genuine new issue, the Council will consider whether it requires a response. However, the Council is not required to respond to repeated points, reframed allegations, commentary on process, speculative assertions, personal criticism, or correspondence which in substance repeats matters already addressed.

5. Associated individuals, groups and indirect contact

This policy may apply not only to an individual complainant, but also to behaviour carried out by a group, campaign, associated individuals, or persons acting together where the Council reasonably considers that the conduct forms part of the same pattern of unreasonable behaviour.

The Council may take into account contact made indirectly, including through third parties, social media, public forums, repeated copying-in of councillors or external bodies, or attempts to encourage others to continue correspondence on the same or substantially similar matters.

Where the Council reasonably considers that an individual is using another person, group, account or forum to avoid restrictions imposed under this policy, the Council may treat that conduct as a continuation of the restricted behaviour and may extend, vary or reapply restrictions accordingly.

The Council will not normally treat a person as vexatious solely because they have raised a complaint, criticised the Council, disagreed with a decision, or exercised a lawful right. The concern must relate to the nature, frequency, tone, persistence, impact or wider pattern of the conduct.

6. Refusal to engage with abusive or bad-faith communications

The Council reserves the right not to respond to communications which are abusive, threatening, defamatory, harassing, insulting, discriminatory, personally targeted, repetitious, excessively lengthy, scattergun in nature, or otherwise unreasonable.

The Council may also decline to respond where correspondence appears designed primarily to provoke, exhaust resources, create procedural traps, generate further disputes, or continue a matter which has already been concluded.

Where appropriate, the Council may issue a single response stating that no further correspondence will be entered into on the matter.

Further correspondence may then be logged and retained without acknowledgement, unless it raises a genuinely new and material issue which the Council considers requires attention.

7. Managing unreasonable behaviour

Where a complainant is suspected of being persistent, vexatious, aggressive or abusive, the Council will normally ensure that the complaint or correspondence has been considered properly in accordance with the relevant procedure before restrictions are imposed.

The Council will normally respond in stages: warning, reminder where appropriate, and vexatious designation where the behaviour continues or is sufficiently serious.

Stage 1: Warning

The Clerk, or the Chairman where appropriate under this policy, may issue a warning explaining:

- why the behaviour is causing concern
- the standards of behaviour expected
- that continued behaviour may lead to restrictions being imposed

A copy of this policy will normally be provided with that warning.

Stage 2: Reminder

Where behaviour continues following a warning, the Clerk, or the Chairman where appropriate under this policy, may issue a reminder before a person is designated under this policy.

A reminder may refer back to the previous warning, identify the continuing behaviour causing concern, and explain that designation may follow if the behaviour continues.

The Council is not required to issue more than one reminder before proceeding to designation.

Stage 3: Designation

If the behaviour continues following a warning and, where appropriate, a reminder, the Clerk or the Chairman, where authorised under this policy, Full Council, or a properly authorised committee may designate the complainant as persistent, vexatious, aggressive, abusive or otherwise unreasonable and may impose proportionate restrictions.

Where a designation decision is taken by a committee, the committee meeting must be properly convened and quorate. The decision and reasons for it must be recorded in the minutes, subject to any lawful exclusion of confidential or personal information.

Any restriction imposed will be appropriate and proportionate and will apply for a specified period of up to 12 months.

Restrictions may include:

- requiring all contact to be made through a single named officer or designated contact point
- restricting contact to written correspondence only
- limiting contact to specified times, frequencies or formats
- requiring a third party to act on the complainant's behalf
- prohibiting direct contact with individual councillors or staff members
- requiring meetings to be arranged in advance and, where necessary, attended by a witness or second Council representative
- advising that no further response will be given on a concluded matter
- advising that correspondence sent outside the designated contact route may not receive a response
- requiring all contact to be sent only to a designated email address or postal address
- requiring all contact to be addressed only to the Chairman, Vice-Chairman, Clerk, solicitor or other named representative specified by the Council
- refusing to respond to correspondence sent directly to individual councillors or staff where a designated contact route has been imposed
- refusing to circulate abusive, repetitive or personally targeted correspondence to councillors or staff
- limiting responses to brief acknowledgements, summaries, or statements that no further response will be given
- declining to respond to correspondence which repeats matters already addressed, whether or not it is presented in a different form
- referring communications to the police, solicitor, monitoring officer or other relevant authority where appropriate
- retaining correspondence for evidential purposes without issuing a response

Where behaviour is clearly abusive, threatening, defamatory, harassing, persistently disruptive, or presents a risk to the wellbeing of staff or councillors, the Council may proceed directly to designation and restrictions without issuing a prior warning or reminder.

Where behaviour threatens the safety or welfare of staff or councillors, the Council may consider further action including referral to the police, seeking legal advice, or taking other appropriate legal steps.

8. Review and continuation of restrictions

A review will be undertaken at the time the restriction is due to end. The review may be started shortly before the expiry date to allow a timely decision to be made.

Following review, a designation may be lifted, varied or continued for a further specified period of up to 12 months. Any continuation must meet the same requirements as a new designation, and the decision and reasons must be recorded.

The review may take account of the evidence supporting the original designation and any relevant conduct, correspondence or other evidence arising during the restricted period. The Council is not required to lift restrictions merely because no further contact has been received where that is likely to be the result of the restriction itself.

A designation must not ordinarily be permanent or indefinite. Such a designation may be considered only in exceptional circumstances following specific written advice from the Council's appointed legal advisers that it would be lawful, necessary and proportionate, and must be expressly approved by Full Council or a properly authorised and quorate committee.

The Council may keep a record of conduct, correspondence, decisions and restrictions for governance, legal, evidential, safeguarding and wellbeing purposes.

9. Freedom of Information & Environmental Information requests

Requests made under the Freedom of Information Act or the Environmental Information Regulations will be handled under the applicable legislation and the requirements and guidance of the Information Commissioner's Office in force at the time.

Where the relevant test is met, a request may be dealt with as vexatious, repeated or manifestly unreasonable, as applicable; however, it will not be refused solely because the requester is or has previously been designated under this policy.

The Council will acknowledge a request within five working days and will normally provide its full response within 20 working days. Where an extension is permitted or required, the requester will be informed of the reason and the revised response date in accordance with the applicable legislation and current ICO guidance.

If the requester is dissatisfied with the response, they may request an internal review. The Council will acknowledge the review request within five working days and will normally provide the review outcome within 20 working days.

Where more time is permitted or required, the requester will be informed of the reason and the revised date. If the requester remains dissatisfied after the internal review, they may complain to the Information Commissioner's Office.

10. New complaints

New complaints from complainants previously designated as persistent or vexatious will be considered on their merits.

Existing restrictions may be reapplied where appropriate, but genuine service requests and genuinely new complaints will not be ignored.

11. Contact details

Post: Framfield Parish Council, PO Box 547, Uckfield, East Sussex, TN22 9JB.

Telephone: 01825 890182

Email: clerk@framfieldcouncil.org.uk

12. Policy Adoption

Version 1.0 of this policy was adopted by Framfield Parish Council at its meeting on 28th July 2026. This revised version will take effect upon approval by Full Council. Minor amendments may subsequently be made under authority delegated to the Clerk.

13. Document Revision History

Date	Version	Revision
10/07/2026	Draft	Final draft
28/07/2026	1.0	Final adopted version