



Unreasonable Behaviour Policy

1 Introduction and Overview

- 1.1 Ballynahinch Credit Union Limited (the credit union) makes a positive contribution to a strong and safe community and recognises the right of every individual to be heard, understood and respected. This is paramount given our operating principles and more specifically our democratic structure and our service to members over the maximising of surpluses.
- 1.2 We also believe that our officers and staff have the right to work in a safe environment, free from any abuse or harm caused by others.
- 1.3 We expect all members to treat our officers and staff with courtesy and respect at all times. This applies to all means of communication, such as verbal, in person and written.
- 1.4 In a small number of cases, the actions of some members could become unacceptable because they involve abuse of our officers and staff and/or our processes and procedures.
- 1.5 We do not expect any member of staff to feel uncomfortable performing their role or job.
- 1.6 There are a range of actions we consider to be unacceptable, which can be best grouped as follows:
 - i. Aggressive or abusive behaviour including offensive language, inflammatory statements, threat of physical violence;
 - ii. Unreasonable demands and/or unreasonable levels of contact, and;
 - iii. Complaints that are unsubstantiated, vexatious, and/or intentionally disruptive.
- 1.7 This policy applies to:
 - i. all areas of credit union work;
 - ii. anyone who contacts us including existing or potential members, representatives and businesses (references to 'member' include references to existing or potential members, external individuals, representatives and businesses);
 - iii. all methods of contact including telephone, face-to-face, letters, e-mails, social media and other digital channels.

2 Aggressive or abusive behaviour

- 2.1 We understand that individuals can become angry when they feel that matters about which they feel strongly are not being dealt with as they wish. If that anger escalates into aggression or abuse towards our officers or staff, we consider that unacceptable.
- 2.2 Aggressive or abusive behaviour includes language (whether verbal or written) that may cause officers or staff to feel afraid, threatened or abused and may include threats, personal verbal abuse, derogatory remarks and rudeness.
- 2.3 We also consider inflammatory statements, remarks of a discriminatory nature and unsubstantiated allegations, to be abusive behaviour.

- 2.4 Where a member (or non-member) is aggressive or abusive, we may decide to:
- i. Advise that person that we consider their actions offensive, unnecessary and unhelpful and ask them to stop;
 - ii. End telephone calls / appointments / meetings;
 - iii. Use blocking restrictions on social media platforms;
 - iv. Notify the police. This will always be the case if physical violence is used or threatened;
 - v. Take any other action that we consider appropriate to the circumstances.

3 Unreasonable demands and / or unreasonable levels of contact

3.1 A demand becomes unacceptable when it starts to impact excessively on the work of our staff, or when dealing with the matter takes up an excessive amount of time and in so doing, disadvantages other members.

3.2 Where a member is unreasonably demanding, repeatedly contacts us in person, by phone, email etc., contacts various officers about the same issue, raises the same issue repeatedly, or sends us large numbers of documents about which the relevance is not clear, we may decide to:

- i. Limit contact to telephone calls from the person at set times on set days;
- ii. Restrict contact to a nominated officer or member of staff who will deal with future calls or correspondence;
- iii. See the person by appointment only;
- iv. Restrict contact to written correspondence only;
- v. Refuse to deal with further correspondence and return any documents;
- vi. Use blocking restrictions on social media platforms;
- vii. Take any other action that we consider appropriate to the circumstance.

4 Complaints that are unsubstantiated, vexatious, and/or intentionally disruptive

4.1 Unreasonably persistent complainants may have legitimate complaints but be pursuing them in inappropriate ways, or they may be intent on pursuing complaints which appear to have no substance or which have already been investigated and determined.

4.2 We will distinguish between people who make a number of complaints because they really think things have gone wrong as a result of a series of service failures, and people who are being unreasonably persistent or otherwise behaving unreasonably.

4.3 We understand that complainants can be frustrated and aggrieved and it is therefore important to consider the substance of the complaint. However, members sometimes pursue complaints or other issues that treat officers or staff in a way that is unacceptable.

4.4 While we recognise that some complaints may relate to serious and distressing incidents, this credit union does not tolerate abusive, offensive or threatening behaviour and will take steps to protect officers and staff who are subject to unreasonable behaviour.

4.5 These are some examples of the types of actions and behaviours that might be identified as unreasonable complainant behaviour:

- i. Refusing to specify the grounds of a complaint, despite offers of assistance;

- ii. Refusing to cooperate with the complaints investigation process while still wishing their complaint to be resolved;
- iii. Refusing to accept that certain issues are not within the scope of a complaints procedure;
- iv. Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or within good practice;
- v. Making what appear to be groundless complaints about officers or staff dealing with the complaints, and seeking to have them replaced;
- vi. Changing the basis of the complaint as the investigation proceeds and/or denying statements they have made at an earlier stage. At the same time, we acknowledge that a complainant has a right to challenge our recollection/recording and to clarify how this could be resolved before we categorise the complainant's behaviour as denying the matter;
- vii. Introducing new information, at a late stage, which the complainant expects to be taken into account and commented on, or raising large numbers of detailed, but unimportant, questions and insisting they are all fully answered;
- viii. Covertly recording meetings and conversations;
- ix. Submitting falsified documents from themselves or others;
- x. Bringing complaints designed to cause disruption or annoyance or lacking any serious purpose or value;
- xi. Making excessive demands on the time and resources of staff and members with lengthy and/or repeated telephone calls, emails to numerous staff, or detailed letters every few days and expecting immediate responses;
- xii. Behaviour that appears to be deliberately targeted over a significant period of time at one or more officers, staff or members of the credit union, without good cause;
- xiii. Submitting repeat complaints, with minor additions/variations, so the complainant insists they are 'new' complaints which should be put through the full complaints procedure;
- xiv. Refusing to accept the outcome decision of a complaint – repeatedly arguing the point and complaining about the decision, with no new evidence;
- xv. Insisting on pursuing unjustified complaints and/or unrealistic outcomes to legitimate complaints. Taking actions that are out of proportion to the nature of the complaint, even when the complaints procedure has been exhausted;
- xvi. Behaviour which has a significant and disproportionate adverse effect on the credit union's resources;
- xvii. Inappropriate behaviour towards officers or staff investigating or involved in the complaint such as inappropriate use of language, aggression or violence;
- xviii. Combinations of some or all of the above.

4.6 If unreasonable complainant behaviour is identified, we may decide to:

- i. Conclude not to uphold a complaint;
- ii. Refuse to accept complaints that are not new complaints;
- iii. Take any other action that we consider appropriate to the circumstance.

4.7 This policy does not override any regulatory responsibilities to investigate or report eligible complaints.

5.0 Taking action

- 5.1 Before we take any action, we will give the individual the opportunity to modify their behaviour. We have zero-tolerance for physical or verbal abuse.
- 5.2 Where we find the behaviour and demands of our members to be unreasonable, we will consider whether we need to take more formal action. We'll aim to keep the impact of this to the minimum necessary to solve the problem. If the behaviour continues, we will take action as set out in this document.
- 5.2 Where appropriate, members will be told in writing why a decision has been made, what the alternative arrangements will be and the length of time that these restrictions will be in place.

6.0 Who will make a decision?

- 6.1 In most circumstances, the Board will make authoritative and final decisions to deal with unacceptable behaviour. Final decisions will only be made after fully analysing the facts of a situation, and hearing from all parties involved.

7 Appeal

- 7.1 There is no internal right to appeal final decisions regarding unacceptable behaviour, however, any member can escalate a complaint that has exhausted the credit union's complaints process to the Financial Ombudsman Service.

8 Keeping records

- 8.1 We will document and internally report all incidents that are relevant to this policy.
- 8.2 Records will be stored for a minimum of 6 years.

9 Policy Review

- 9.1 This policy is formally reviewed by the board of directors on an annual basis