

Unreasonable Complainant Conduct Management Policy and Procedure

Owner People and Culture (PC, CS)
Last Reviewed 28/05/2024

CHC/2024/6830
Version 1.00

1. Purpose

To cultivate an effective and consistent process for managing those instances when complainant conduct unjustly impacts the department, its employees, or our wider customer community. Where interactions with customers are compatible with a safe workplace, the department will uphold our customers' rights to voice concerns and make complaints, as we view this as a crucial aspect of our growth and improvement. All measures are underpinned by the requirements of the current Australian standard for handling customer complaints (AS 10002:2022).

Unreasonable complainant conduct (UCC) refers to any conduct by a customer complainant that raises significant health, safety, resource, or equity concerns for the department, its employees and other customers. This includes aggression, verbal abuse, threats of harm or violence, excessive phone calls and emails, and refusal to accept decisions or recommendations. Unreasonable conduct can be categorised into five types: unreasonable persistence, unreasonable demands, unreasonable lack of cooperation, unreasonable arguments, and unreasonable behaviours. Refer to [Appendix 1](#) for detailed descriptions of these UCC categories.

2. Policy

The department is committed to ensuring accessibility and responsiveness to all complainants, regardless of their ethnic identity, national origin, religion, language background, sex, gender, sexual orientation, physical ability, or other cultural and personal factors. The effectiveness and efficiency of our work, as well as the health, safety, and security of our employees, are crucial to the success of our department. Investing appropriate resources, time, and attention across all complaints, rather than diverting resources unfairly to manage UCC, is also a key priority for the department.

When complainants exhibit unreasonable behaviour, it can significantly impact our ability to carry out our work effectively. Therefore, the department will proactively and decisively manage any unreasonable complainant conduct that adversely affects us and will provide support to our employees in accordance with this policy.

3. Principles

To assist all employees to better manage UCC the department will:

- provide support and ensure that employees feel confident and supported in managing UCC
- ensure that employees act fairly, consistently, honestly, and appropriately when responding to UCC incidents
- clarify the roles and responsibilities of employees in managing UCC, and how this policy will be applied
- identify appropriate circumstances for managing UCC, including the utilization of strategies outlined in the NSW Ombudsman's '[Managing unreasonable conduct by a complainant manual](#)', script ideas in the Queensland Ombudsman's '[Managing unreasonable complainant conduct resource](#)', alternative dispute resolution strategies, and legal instruments when necessary
- establish clear criteria for considering changes or restrictions on complainant access to services



- implement processes for recording and reporting UCC incidents, as well as consulting and notifying complainants about any proposed action or decision to change or restrict their access to services
- define procedures for reviewing decisions made under this policy, including specific timeframes for conducting reviews.

4. Associated policy

[Customer Complaints Management Policy & Procedure](#)

5. Authority

[Public Sector Act 2022](#)

6. Human rights compatibility

The department is committed to respecting, protecting and promoting human rights. Under the [Human Rights Act 2019](#), the department has an obligation to act and make decisions in a way that is compatible with human rights and, when making a decision, to give proper consideration to human rights. Of particular relevance is section 23(2)(b) of the Act, which stipulates the right of every eligible person to have access to the public service. This right underscores the department's commitment to ensuring our services are accessible, equitable, and non-discriminatory. Therefore, when making a decision under this policy and procedure, decision-makers must comply with the Act as a whole, and specifically ensure they uphold the rights outlined in section 23(2)(b) (refer to [Comply with Human Rights Act](#)).

7. Scope

This policy and procedure applies to all permanent employees, fixed term temporary employees, non-payroll industry partners, trainees, casual employees and volunteers who may be involved in receiving or managing customer complaints.

This policy does not override the complaints process detailed in the Customer Complaints Management Policy and Procedure. The strategies described in this document should be applied cautiously and sparingly and should never be seen as a quick solution for dealing with complainants who are angry or frustrated or who are regarded as being annoying or a nuisance.

Refer to the Complaint Management Framework for standard complaint procedures or seek further advice by contacting [Workforce Relations and Integrity, People and Culture](#).

8. Delegations

Delegations are to be exercised in accordance with the [Human Resource delegations and authorisations](#). Delegation Schedules are reviewed on a regular basis to ensure they remain current and relevant to the operational needs of the department. It is recommended that delegate authority levels are confirmed prior to exercising any powers in relation to any determination.

9. Procedure

9.1 Support the employee

When employees raise concerns that they have experienced UCC, the first priority for the department is to provide appropriate support. This may include:

- Discussion about management of the UCC
- A temporary change of duties (not a change in role but a brief modification in tasks to limit interactions with the complainant, if targeted)
- Medical, e.g., supporting employee to consult their treating medical professional
- DESI Mental Health Support Officers
- Police (if the conduct is criminal)
- Assistance from Workforce Safety and Wellbeing within People and Culture, or
- The department's employee assistance program.

At the very least, a conversation should occur with the employee's supervisor to establish details of the conduct. This may reveal a history of similar conduct from a complainant which has not been managed appropriately.

9.2 Identify the conduct category

[Appendix 1](#) provides the definitions for this policy's five broad categories of UCC:

- Unreasonable persistence
- Unreasonable demands
- Unreasonable lack of cooperation
- Unreasonable arguments, and
- Unreasonable behaviours.

Identifying the category of conduct will help to determine the appropriate mitigation strategy.

9.3 Choose appropriate mitigation strategies

The UCC should be generally managed by limiting or adapting the way the organisation interacts with the complainant. These adaptations can restrict:

- Who the complainant can contact: e.g., limiting interactions to a single employee
- The subjects they can discuss: e.g., restricting the scope of communications
- When they can establish contact: e.g., limiting the time, day, and frequency of communications
- Where they can make contact: e.g., limiting face-to-face encounters to secure facilities
- How they can contact: e.g., modifying or restricting forms of contact including interviews, phone calls, and written communications.

The department recognises that discretion and adaptation will be needed to suit each complainant's personal circumstances.

A decision to limit a complainant's contact with the department is to be made in consultation with Manager, Workforce Relations and Integrity or Chief Human Resources Officer and communicated to the complainant in writing by the responsible senior executive. Any limitations on complainant contact with the department will be subject to a six-monthly review process to evaluate the need to continue.

Any decision to restrict services must be supported by a Human Rights assessment, endorsed by the Human Rights delegate (Manager, Workforce Relations and Integrity). This ensures the application of a reasonable limitation on a complainant's right to access the public service is appropriately recorded.

[Appendix 2](#) provides some basic strategies on when and how to limit contact. Assistance in managing specific cases, including obtaining a Human Rights assessment and setting up email diversions, can be obtained by contacting [Workforce Relations and Integrity, People and Culture](#).

9.4 Apply strategies and keep records

Strategies for managing unreasonable persistence, violence, or aggression should be promptly and clearly communicated to relevant employees, other parties, and the complainant. They should be supported by the business area supervisors and approved by their managers.

These strategies need to be fully documented on the relevant case file. For serious occurrences, an appropriate record should remain accessible to the business area, providing sufficient information to inform employees dealing with the complainant's future behaviour. Where Workforce Relations and Integrity is involved, they will also retain a record of the UCC. For routine or less serious behaviour, a brief record on the client's file may be sufficient.

10. Responsibilities

Director-General

- Ensure the strategies applied to unreasonable complainant conduct (UCC) are consistent with the Customer Complaint Management Policy and Procedure and s264 *Public Sector Act 2022*

Deputy Directors-General/Assistant Director-General

- Ensure that the UCC policy and procedure is followed within each division and region
- Ensure that when UCC is reported it is assessed to determine if it can be dealt with within a routine complaints process
- Ensure the timely and effective application of support and mitigation strategies in accordance with this UCC management policy
- Ensure that appropriate action, including preventative action where warranted, is taken to address sources of UCC, adverse issues and trends identified and to foster continuous improvement
- Monitor, analyse and review UCC data to identify trends, impacts and timeliness of responses. Report any identified trends or relevant information to the Manager, Workforce Relations and Integrity, People and Culture, Corporate Services.

Executive Directors, Directors (as appropriate)

- Allocate sufficient resources to ensure the UCC process is effectively administered, including the assignment of specific roles and responsibilities to employees as appropriate
- Approve (in consultation with Manager Workforce Relations and Integrity or Chief Human Resources Officer) formal communication limitations which reduce or remove options for contacting the department (e.g., phone number blocking) and advise complainants of such limitation (Executive Directors and higher)
- Ensure that employees with roles in handling complaints are provided with appropriate information and training, and include expectations/performance indicators in their Performance Development Plan
- Refer allegations of misconduct by employees immediately to the Manager, Workforce Relations and Integrity, People and Culture, Corporate Services, for assessment (if not already identified and referred)

- Ensure that their business area records all the necessary information related to UCC matters
- Monitor the progress of mitigation measures applied to complainants, including implementation and removal of limitations applied to communication
- Monitor, analyse and review UCC data to identify trends, impacts and timeliness of responses. Report any identified trends or relevant information to the Manager, Workforce Relations and Integrity, People and Culture, Corporate Services
- Ensure that appropriate action, including preventative action where warranted, is taken to address sources of UCC, adverse issues and trends identified and foster continuous improvement.

Complaint Management System Manager: Chief Human Resources Officer, Corporate Services

- Establish a process of performance monitoring, evaluation and reporting UCC
- Reporting to senior management on significant UCC incidents and trends identified with recommendations for improvement where appropriate
- Identifying and allocating resources needed for effective oversight of UCC
- Implementing and maintaining UCC management across the department, including
 - I. provision of adequately documented UCC guidance for all employees
 - II. setting and meeting key performance indicators for the effective and efficient functioning of UCC
 - III. other requirements including system reviews
 - IV. implementing internal and external escalation procedures for unresolved matters.

Divisional Complaint Coordinator

- Act as a central referral and coordination point regarding requirements of the UCC policy
- Act as liaison between division and Workforce Relations and Integrity, People and Culture.

Manager, Workforce Relations and Integrity, People and Culture, Corporate Services

- If a complaint involves allegations about employee conduct or breaches of the *Human Rights Act 2019*, the complaint is assessed in accordance with the relevant policy and procedure
- Any service restrictions proposed to mitigate unreasonable conduct are assessed to determine whether the action is a reasonable limitation of the complainant's rights under the *Human Rights Act 2019* s23(2)(b)
- Assesses reports of trends and emerging issues from divisions and liaises with the Principal Integrity Officer on policy and process improvements.

Principal Integrity Officer, Workforce Relations and Integrity, People and Culture, Corporate Services

- Monitors trends and emerging issues and provides reports to Customer Complaints Management System Manager
- Provides policy and procedure advice to DCCs and all employees likely to encounter or manage UCC.

Managers/Directors (as required)

- Ensure that all frontline employees who deal with customers have received the necessary training prior to dealing with complainants that may present with UCC
- Approve, oversee implementation and advise complainants of UCC mitigation strategies that involve communication management (e.g., email diversion), but not removal of communication channels
- Ensure appropriate support strategies are available in business areas likely to experience UCC
- Report significant incidents and trends to the relevant Executive Director.

Supervisors

- Discuss any UCC incidents with the involved employees

- Apply appropriate support strategies for employees experiencing UCC, including liaison with Workplace Safety and Wellbeing for case management where appropriate
- Identify the relevant UCC category for each incident to determine appropriate mitigation strategies
- Seek management approval to implement communication limitations where necessary
- Communicate with team members who may encounter UCC from complainants recorded as a source of UCC
- Monitor and record strategies applied in the relevant case files
- Report UCC incidents to managers.

All Employees

- Where possible, apply the Customer Complaints Management policy and procedure to manage complaints in an effective and timely manner
- Demonstrate the conduct expected of customers by communicating positively, respectfully and without discrimination
- Have sufficient knowledge and understanding of the department's UCC policy to be able to identify, report and manage UCC if it occurs.

11. Related Documents

- Queensland Public Service Customer Complaint Management Framework
- Queensland Public Service Customer Complaint Management Guideline
- Ombudsman Queensland - Managing unreasonable complainant conduct
- Ombudsman New South Wales - Managing unreasonable conduct by a complainant
- Code of Conduct for the Queensland Public Service
- Safety and Wellbeing Policy
- Appropriate Behaviour Guidelines.

12. Further information

For further information please contact the Workforce Relations and Integrity, People and Culture, Corporate Services – Complaints@des.qld.gov.au.

13. Storage of Information

All information should be managed in accordance with the department's [Recordkeeping Policy](#). This policy and procedure has been created to support the department's commitment to its responsibilities under the [Public Records Act 2002](#). This should be read in conjunction with other related policies and procedures, including the [Recordkeeping Email Policy](#), [Retention and Disposal Policy](#), and [Digitisation Disposal Policy](#). In addition, personal information should be managed in accordance with the [Information Privacy Act 2009](#), in particular the [Information Privacy Principles](#) (IPPs) in that Act. For more information refer to the following sites: [Records governance | Information Technology Partners \(ITP\) \(resnet.qg\)](#) and [About information privacy : DESI intranet \(resnet.qg\)](#).

14. Review

This policy shall be reviewed within two years of the date of the policy.

15. Approval

Signed:

Rhiannan Howell

Deputy Director-General, Corporate Services
Department of Environment, Science and Innovation

Date: 07 June 2024

16. Version history

Date	Version	Action	Description / comments
07/06/2024	1.00	Approved by the Deputy Director-General, Corporate Services	Approval of the Policy and Procedure.

17. Keywords

CHC/2024/6830; unreasonable; complainant; conduct; complaint; accessibility; responsiveness; health; safety; security; dissatisfaction; Ombudsman; service

Appendix 1 – Defining unreasonable conduct by a complainant

Unreasonable complainant conduct

The department acknowledges that the majority of complainants engage with us in a reasonable and responsible manner, even when they are experiencing high levels of distress, frustration, and anger regarding their complaint. However, in very few cases, some complainants exhibit inappropriate and unacceptable behaviour. This behaviour can include aggression, verbal abuse towards our employees, threats of harm or violence, as well as excessive and unnecessary phone calls and emails. In addition, complainants may make unreasonable demands on our time and resources or refuse to accept our decisions and recommendations regarding their complaints. Unless cultural factors reasonably explain such behaviour, we classify it as 'unreasonable'.

In summary, unreasonable conduct by a complainant refers to any behaviour exhibited by a current or former customer complainant that raises significant health, safety, resource, or equity concerns for our department, employees, other service users, or the complainant themselves.

Unreasonable complainant conduct (UCC) can be categorised as follows:

1. Unreasonable persistence

Unreasonable persistence refers to continuous and relentless behaviour by a complainant that disproportionately and unreasonably impacts our department, employees, services, time, or resources. Examples of unreasonably persistent behaviour include:

- Unwillingness or inability to accept reasonable and logical explanations, including final decisions that have been thoroughly considered and addressed
- Persistent demands for a review solely because the opportunity exists, without presenting an argument or case for one
- Pursuing all available review options, even after we have explained that a review is unwarranted, and refusing to accept that no further action will be taken on their complaint
- Attempting to reframe a complaint in an effort to have it reopened
- Multiple and repeated phone calls, visits, letters, and emails after being repeatedly requested not to contact us
- Contacting different individuals within or outside our department in an attempt to obtain a different outcome or a more sympathetic response to their complaint (known as internal and external 'forum shopping').

2. Unreasonable demands

Unreasonable demands refer to requests made by a complainant that disproportionately and unreasonably impact our department, employees, services, time, or resources. Examples of unreasonable demands include:

- Instructing and demanding specific handling methods for their complaint, its priority, or the desired outcome
- Insisting on personal communication with the Director-General, Deputy Director-Generals, or other senior executives, despite our clear explanations as to why it is inappropriate or unnecessary
- Employing emotional manipulation resulting in intimidation, harassment, shaming, seduction, or presenting themselves as victims, when such circumstances do not exist
- Requesting outcomes that are not feasible or appropriate, such as demanding the termination or prosecution of an individual, or seeking apologies or compensation without reasonable grounds
- Insisting on services beyond what we can provide, even after repeated explanations.

3. Unreasonable lack of cooperation

Unreasonable lack of cooperation occurs when a complainant refuses or fails to cooperate with our department, employees, or the complaints process, resulting in a disproportionate and unreasonable use of our services, time or resources. Examples of unreasonable lack of cooperation include:

- Sending us a continuous stream of complex or disorganised information without clearly defining the issue or explaining its relevance to their complaint
- Providing minimal or incomplete details about their complaint, or sharing information in fragments
- Rejecting or disregarding our instructions, suggestions, or advice without a clear or justifiable reason
- Persistently arguing that a particular solution is the correct one, despite valid opposing arguments and explanations
- Exhibiting unhelpful behaviour such as withholding information, acting dishonestly, or misquoting others.

4. Unreasonable arguments

Unreasonable arguments encompass claims that lack reasoning, logic, coherence, or truthfulness, and disproportionately and unreasonably impact our department, employees, services, time, or resources. Arguments are deemed unreasonable when they:

- Fail to follow a logical sequence that can be explained by the complainant
- Lack evidence or are based on conspiracy theories
- Cause a complainant to dismiss all valid and opposing arguments
- Deem trivial matters as significant, demanding excessive time, resources, and attention
- Contain false, inflammatory, or defamatory statements.

5. Unreasonable behaviour

Unreasonable behaviour refers to conduct that is unreasonable in all circumstances, regardless of a complainant's stress, anger, or frustration, as it unreasonably compromises the health, safety, and security of our employees, other service users, or the complainant themselves. Examples of unreasonable behaviour include:

- Acts of aggression, verbal abuse, derogatory, racist, or grossly defamatory remarks
- Harassment, intimidation, or physical violence
- Rude, confrontational, or threatening correspondence
- Threats of self-harm/harm to others, use of weapons, or property damage, including bomb threats
- Stalking, both in-person and online
- Engaging in emotional manipulation.

All employees should be aware that the department has a zero-tolerance policy for any harm, abuse, or threats directed towards them. Conduct of this nature will be addressed in accordance with this policy and procedure, and the Safety and Wellbeing Policy.

Appendix 2 – Mitigation strategies

Strategies should be selected taking account of the individual circumstances of each UCC matter. Some factors are likely to have already been identified if there were early warning signs. Factors for consideration are:

- history of complainant's interactions with agency
- previous successful communication techniques
- likely level of impact/risk on – employees, clients, service delivery
- personal thresholds and skill level of the complaint handlers
- agency policy, procedures and protocols
- any jurisdictional issues.

Limiting the duration and frequency of phone calls, written correspondence, or face-to-face interviews or limiting contacts to writing only are examples of measures that can mitigate UCC. A common strategy for dealing with inappropriate emails is a temporary diversion to the Complaints@des.qld.gov.au mailbox. Such arrangements are reviewed after six months and removed if the UCC has not continued.

For violent or disruptive complainants, business areas may seek approval to restrict face-to-face interactions to secure areas, specified timings, appointment-based visits, or through a representative only.

The complainant's right to access the public service, as provided for by the *Human Rights Act 2019* s23(2)(b), must be considered if any strategy is chosen which restricts services to the complainant. [Manager, Workforce Relations and Integrity](#), People & Culture will assess whether such a restriction is a reasonable limitation of this right. This assessment should be communicated to the complainant and included with the case records.

The tables on the following pages list examples and strategies for managing common behaviours that fall under the five categories of UCC.

Persistence

Examples

Unrelenting conduct causing disproportionate and unreasonable impact on the agency, its employees, services, time and/or resources:

- persists with unconventional interpretations of policy or law
- unwilling/unable to accept reasonable/logical explanations even after comprehensive consideration and response
- demands review because it is available often without presenting an arguable case for review
- pursues and exhausts all available review options
- refuses to accept a complaint is closed or that further action cannot or will not be taken
- uses contrived arguments to garner support for further consideration
- over-repetitive phone calls, visits, letters, emails (including cc'd correspondence), sometimes after being asked to stop
- internal/external forum shopping – seeking contact with others within an agency in the hope of receiving a different outcome or more sympathetic response.

Basic Strategies

- use the department's review processes effectively and once only
 - once full consideration and response has been provided be prepared to say 'NO – the issue will not be considered further' and stick to it (if appropriate and there are no jurisdictional issues)
 - do not accept repeated complaints on the same issue (unless significant new information is received)
 - use verbal communication strategies such as silence, repetition, and limiting duration of contact to reduce/stop interruptive behaviour
 - name the behaviour and ask the complainant to 'STOP'
 - set the pace of communication by only responding at suitable intervals
 - clarify how, when, and with whom the complainant should communicate and about what, then retain a firm position
 - terminate unproductive communication and clearly state the 'when and why' the communication is to be terminated
 - advise of appropriate methods of internal/external review (without referring just to appease the complainant).
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Demands

Express or implied demands causing disproportionate and unreasonable impact on the agency, employees, services, time and/or resources:

- issuing instructions/demands on how their complaint should be handled, the priority it should be given, or the outcome that should be achieved
- insisting on talking personally to senior officers/managers/executives when it is not appropriate or warranted
- emotional blackmail and manipulation intended to cause guilt, intimidate, harass, shame, seduce or portray themselves as victimised (when this is not the case)
- insisting on impossible or inappropriate outcomes for the circumstances (e.g. revenge, for someone to be sacked or prosecuted, or provision of an apology/compensation without a reasonable basis)
- demanding services of a nature/scale beyond what the agency can provide when this has been explained to them repeatedly
- moving the goal posts/changing complaint issues while the complaint is still being dealt with.

- set limits and manage expectations by advising who will deal with a complaint, what can be done, and how it will be handled
- identify the central issues of complaint, seek the complainant's agreement on these issues and stay focused on them
- identify and advise the complainant of the unreasonable demands
- advise why demands cannot or will not be met
- state why the complainant must stop making the demand
- avoid escalating calls/demands where the complainant's sole motivation is disagreement with your advice
- end unproductive communications (with suitable warning and explanation)
- offer the complainant a choice (if possible) then enforce the limits appropriately
- ask the complainant to wait for the matter to be finalised before raising their dissatisfaction
- stick to the facts and avoid empathising where complainants appear to be using emotional manipulation.

Lack of cooperation

Unwillingness/inability to cooperate with the agency, its employees, and processes causing disproportionate and unreasonable impact on the use of services, time and/or resources:

- sending streams of comprehensive/disorganised information without clearly defining issues or explaining the relationship with the issues complained about (where the complainant is clearly capable of doing this)
- providing little or no details, irrelevant information, or 'trickle feeding' information
- refusing to follow or accept instructions, suggestions, or advice without clear or justifiable reasons
- arguing frequently and/or with extreme intensity that particular solutions are correct despite valid contrary arguments and explanations having already been provided by the agency
- displaying unhelpful behaviour (e.g. withholding information, acting dishonestly, misquoting others).

- 'set conditions' or require something of the complainant as a precondition to taking action or performing a service, such as requesting the complainant cease sending information or to organise/summarise their submissions
 - advise of the consequences for failure to cooperate or provide information within requested timeframes - such as no action or delayed action by your agency
 - describe the types of information they could provide to help
 - refuse to action a matter if the complainant has wilfully misled or been untruthful in a significant way
 - return correspondence with inappropriate content and request for it to be removed before further consideration
 - end unproductive phone calls and interviews
 - follow up any verbal instructions and confirm meeting outcomes in writing with the complainant.
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Arguments

Submissions not based on reason or logic, or incomprehensible, false or inflammatory, trivial or delirious causing disproportionate and unreasonable impact on the agency, employees, services, time, and/or resources. Arguments are unreasonable when they:

- are irrational or fail to follow a logical sequence
 - are exaggerated, not supported by any evidence and/or are based on conspiracy theories
 - lead to the rejection of all other valid and contrary arguments (refusing to see the other side of the argument)
 - are focussed on the irrelevant or are trivial when compared to the amount of time, resources and attention being demanded
 - are false, inflammatory or defamatory.
 - ‘decline or discontinue’ involvement by politely refusing, or stopping, from doing something once it becomes apparent a complaint issue is groundless or there is no practical purpose in pursuing it
 - explain that complaints are not taken up unless supported by evidence and are sufficiently serious (clarify what that evidence might be)
 - firmly explain that your agency decides on the importance of an issue and the level of resources (if any) dedicated to it
 - refuse to engage further (unless the complaint contains issues requiring response or further issues requiring response are introduced)
 - avoid being drawn into responding to conspiracy theories, unproductive arguments and personal attacks
 - recognise differing points of view while asserting and maintaining your agency holds its own views
 - keep responses firm and as brief as possible
 - test, reset and manage complainant expectations
 - refer to another appropriate entity where they can raise their issues (courts, minister or ombudsman).
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Conduct that is unreasonable in all circumstances – regardless of how stressed, angry or frustrated a complainant is – because it unreasonably compromises the health, safety and security of employees, other parties or the complainant. Risks associated with some behaviour may be low. However, high and extreme risk behaviours are associated with this category:

- acts of aggression, verbal abuse, derogatory, racist, or grossly defamatory remarks
- harassment, intimidation or physical violence
- rude, confronting and threatening correspondence
- threats of harm to self or third parties, threats with a weapon or threats to damage property including bomb threats
- stalking (in person or online)
- emotional manipulation.

IMPORTANT REMINDER: Your safety and that of other employees, the complainant, and other parties who may be exposed to any unreasonable conduct is paramount. Strategies must always be considered in the context of your agency's security protocols and procedures which will take priority (unless instructed otherwise by supervisors or senior managers). It is vital for future safety that suitably detailed records are made of all behavioural observations, the actions and strategies engaged by employees to manage the behaviours, and how the complainant responded. The differing interpersonal skills, boundaries and thresholds of employees should be considered and recognised as an important factor when selecting appropriate strategies.

- remain calm but responsive
- attempt to calm and influence - be mindful of your own presentation and language selection
- set limits (establishing boundaries and placing limits on services) and enforce them
- set conditions (requiring something from the complainant as a precondition of performing a service or taking action) and enforce them
- name any behaviours and ask the complainant to stop or change them
- outline consequences if behaviour continues, and offer the complainant choices if possible
- give clear warning that abusive communications will be terminated and if the behaviour continues terminate
- if in public areas with an audience consider moving the complainant to a more private setting (if this can be done safely)
- politely ask the complainant to leave and advise that security or the police will be called if they will not leave – follow through.

• Source: [Ombudsman New South Wales - Managing unreasonable conduct by complainants - Model policy](#)