

**VICTIMS & SURVIVORS UNIT**

**THE EXECUTIVE OFFICE**

**Policy on**

**Handling Unacceptable Behaviour from Members of the Public**

## Policy on Handling Unacceptable Behaviour from Members of the Public

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## 1. Introduction

- 1.1. The Victims and Survivors Unit (VSU) recognises the potential for verbal abuse, threatening behaviour or physical assault from members of the public and the detrimental effect this can have on staff. VSU staff should be able to conduct their business in a safe and non-threatening environment. Unacceptable behaviour from members of the public will not be tolerated and the VSU will take the strongest possible action against offenders, including legal action where appropriate. The personal safety of staff is paramount and staff are therefore instructed not to accept or tolerate any violent, threatening or abusive behaviour directed towards them. VSU also recognises its responsibilities and aims to promote an understanding of the reasons for the range of challenging behaviours which may be experienced by staff.
- 1.2. Staff must receive clear instructions and guidance on controls available to reduce the risk of unacceptable behaviour occurring and details of the correct procedures to follow if an incident does occur. This guidance:
  - Highlights communication standards;
  - Outlines controls to be introduced for dealing with members of the public if unacceptable behaviour may be expected; and
  - Lays down procedures for reporting incidents of verbal abuse, threatening behaviour, or physical assault.
- 1.3. This guidance deals with external behaviour from members of the public / non-employee behaviour directed at:
  - A VSU employee; and
  - A member of the public while they are in Castle Buildings or attending an event at which VSU staff are present.

## 2. Definitions

- 2.1. This guidance refers to:

*Any member of the public with whom VSU staff communicate, or come into contact with, in order to carry out their work activities.*

- 2.2. VSU understands that individuals may act out of character in times of difficulty or distress. VSU does not therefore view actions or behaviour as unacceptable simply because a complainant is assertive or determined. However, the actions or behaviour of complainants who are angry,

demanding or persistent may result in unreasonable demands on VSU or unacceptable behaviour towards VSU staff.

2.3. What is deemed to be unacceptable behaviour will often differ depending upon the individual(s) involved and their particular circumstances. Unacceptable customer behaviour may include, but is not limited to:

- Any act of written or verbal abuse, including those of a discriminatory nature;
- Threatening behaviour;
- Intimidation, including the use of dogs;
- Serious or persistent harassment;
- Swearing or the use of foul language;
- Rudeness including derogatory remarks;
- Inappropriate cultural, racial or religious references;
- An actual or attempted physical assault;
- Deliberate damage to property;
- The possession or display of items that may be perceived as threatening, or have potential to cause physical harm or cause psychological distress;
- Engaging the media to record interactions with VSU staff without prior agreement; or
- Behaviour that causes staff to feel upset, threatened, frightened, or physically at risk and is directed at them, or another person, because of their work.

2.4. VSU recognises that some complainants will not or cannot accept that VSU is unable to assist them further or provide a level of service other than that already provided. Such complainants may persist in disagreeing with the action or decision taken in relation to their complaint, or contact VSU about the same issue.

2.5. If a customer demonstrates behaviour that is unreasonably persistent, VSU may decide to restrict the customer's access, in line with the restrictions outlined in Section 8.

2.6. This guidance also applies to incidents that take place outside the workplace, including during non-working hours, in an individual or group setting, providing the incidents are directly connected to the work of the member of staff.

### **3. Legal Requirements**

- 3.1. Under the Health and Safety at Work (Northern Ireland) Order 1978 VSU is required to ensure, so far as is reasonably practicable, the health, safety and welfare of its staff.
- 3.2. The Management of Health and Safety Regulations (2000) impose a duty on VSU to assess all the risks to staff, including those associated with unacceptable customer behaviour, and take steps to avoid or control the risks where necessary.
- 3.3. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1997 (RIDDOR) require that the Health and Safety Executive for Northern Ireland (HSENI) is informed of any accident at work resulting in death, a major injury, or incapacity for normal work for more than 3 days. This includes any act of non-consensual physical violence against a person at work.
- 3.4. The Safety Representative and Safety Committees Regulations and The Health and Safety (Consultation with Employees) Regulations require employers to inform and consult with employees in good time on matters relating to their health and safety. Employee representatives, appointed by recognised trade unions, may make representations to their employer on matters affecting the health and safety of those they represent.
- 3.5. When staff working in a public office are threatened face to face by a member of the public or when an unacceptable customer (UC) (see paragraph 8.2 for a definition of a UC) visits an office when, as a control measure, they have been excluded, they should be asked to leave by that member of staff and line management should be informed immediately. If they do not leave the Grade 7 or other senior manager should request the person(s) involved to leave the premises. If the customer refuses to leave the premises the PSNI should be asked to provide assistance. The PSNI has, under Article 18 (1) (a) of the Public Order (NI) Order 1987, the authority to bring a charge of disorderly behaviour in a public place against the person(s) concerned.

#### **4. Line Manager Responsibilities**

- 4.1. Line managers must ensure that all staff who come into contact with the public have been made aware of the standard of conduct required (see Appendix 1).
- 4.2. Line managers must ensure that adequate and appropriate risk assessments for all tasks involving contact with members of the public and management of lone working have been carried out and should consider if there is a significant risk of unacceptable behaviour associated with their area of work. If a significant risk is identified, the risk assessment should include appropriate control measures (examples of controls are highlighted in Appendix 2).
- 4.3. If a member of the public has already displayed unacceptable behaviour a specific risk assessment should be carried out to ensure that appropriate control measures to deal with the unacceptable customer are put in place. These control measures may include sanctions imposed on the unacceptable customer, such as the only contact with VSU must be in writing, or face to face contact must be with a minimum of two members of staff.
- 4.4. These controls should be fully implemented, discussed with those staff who may be affected, monitored and reviewed as required.
- 4.5. Line managers should ensure that their staff are given adequate information, instruction, and training in dealing with risks associated with unacceptable behaviour.
- 4.6. Line managers should ensure that if a member of staff is subjected to unacceptable behaviour they get any support required and that the incident is reported in line with this guidance.
- 4.7. Line managers should ensure that any incident is immediately escalated to the Grade 7 for a decision on whether it warrants unacceptable customer recording within VSU and, if required, for further guidance on personal security or contacting the PSNI.
- 4.8. Line managers should keep the member(s) of staff involved informed of any action being taken. In cases where prosecution follows, the member(s) of staff should be kept notified of events including the issue of a summons and the outcome of the court case. This should be done on the day of issue or at

the time of the hearing so that staff are aware of the conviction in case of any repercussions.

## **5. Grade 7**

- 5.1. In addition to their responsibilities the Grade 7 should classify and manage unacceptable customer markings in accordance with Section 8, when details of an incident are notified to them.
- 5.2. The Grade 7 should consider, depending on the circumstance of the individual case, whether it would be necessary to arrange for the PSNI to be informed of the case history and any planned meeting so that they are available at short notice, or to request a PSNI escort if operational commitments allow.
- 5.3. The Grade 7 should promote the view that it is the challenging behaviour that is unacceptable, not the client, and should promote an understanding of the reasons for the range of challenging behaviours which currently exist.

## **6. Staff Responsibilities**

- 6.1. All staff who are required to deal with members of the public must ensure that:
  - They behave in an appropriate manner, as outlined in Appendix 1 and in the NICS Code of Conduct, and maintain a professional approach;
  - That they have had appropriate training (induction training and refresher training) as required for the job and associated activity;
  - They comply with control measures put in place by management to safeguard their health and safety in the event of unacceptable customer behaviour including checking the UC register prior to visiting members of the public, inspecting premises, or carrying out fieldwork;
  - If they are dealing with an unacceptable customer, they complete a report following every contact with that client;
  - They report to their line manager any dangers they identify or any concerns they may have about unacceptable customer behaviour against themselves or another person;
  - They notify their line manager immediately or as soon as possible if they are subjected to customer behaviour which they consider to be unacceptable as detailed in Section 7.

## **7. Reporting Incidents**

- 7.1. If an incident of verbal abuse, threatening behaviour, or physical assault does occur it must be reported immediately or as soon as possible to the line manager who should immediately alert the Grade 7 to the incident. All staff involved or who have witnessed the incident must complete detailed reports recording, as far as possible, the actual words or actions used (see reporting template at Appendix 3). These reports should, if possible, be passed to line management within one working day and the line manager should note the content and immediately pass to the Grade 7 for whatever action is deemed necessary.
- 7.2. Incidents should also be reported as follows:
- Actual or threatened physical violence and verbal threats of violence should always be reported by the individual to the PSNI for appropriate action;
  - These reports should be made to the local PSNI call management centre for the area in which the incident occurred;
  - In the case of verbal threats of violence, PSNI will take the decision on whether an investigation is appropriate;
  - The report to the PSNI will generate an incident number – this number should be recorded by the member of staff.

## **8. Identifying Unacceptable Members of the Public**

- 8.1. The classification of an individual as an unacceptable customer is a serious and important protective and preventive measure designed to safeguard all VSU staff by making them aware of the potential risks involved in dealing with that person. Any contact with the person classified as an unacceptable customer must rest with the Grade 7 to ensure the associated risks are managed.
- 8.2. The purpose of classifying an individual as an unacceptable customer is to make clear both to the individual and to VSU staff what restrictions are being placed on the delivery of services to that customer, and why those restrictions have been imposed.
- 8.3. It is important that any restrictions put in place as a result of challenging or unacceptable customer behaviour are proportionate to the behaviour or incident in question.



8.4. For the purposes of this guidance, the table below outlines the circumstances in which an individual may be classified as an unacceptable customer and the proportionate restrictions which may be brought to bear on their engagement with VSU.

### Examples of Unacceptable Behaviour and Proportionate Restrictions

Ref	Example of Unacceptable Behaviour / Incident	Restrictions that may apply
1	Foul language	<ul style="list-style-type: none"> <li>• Give the client 2 verbal warnings. If the behaviour persists, terminate the call/contact with the client.</li> <li>• A one-off incident should be reported to the line manager and recorded on the Challenging Behaviour Register.</li> <li>• In the event of recurring incidents, the client should then be listed on the UC Register, and restrictions from Level 2 onwards should be considered.</li> </ul>
2	Verbal abuse	<ul style="list-style-type: none"> <li>• Give the client 2 verbal warnings. If the behaviour persists, terminate the call/contact with the client.</li> <li>• Thereafter, arrange for a single, named member of staff to deal with all future calls or correspondence from the client.</li> <li>• If the behaviour persists, consider further restrictions such as limiting future contact to a particular form and/or frequency (e.g. in writing only).</li> </ul>
3	Unreasonably persistent or vexatious complaining that disregards VSU's complaints process and/or advice provided to the individual as part of the complaints procedure	<ul style="list-style-type: none"> <li>• Advise the client in writing that such behaviour is unacceptable.</li> <li>• Arrange for a single, named member of staff to deal with all future calls or correspondence from the client.</li> <li>• If the behaviour persists, require the complainant to make an appointment to see a named member of staff before visiting VSU.</li> </ul>

Ref	Example of Unacceptable Behaviour / Incident	Restrictions that may apply
		<ul style="list-style-type: none"> <li>• If the behaviour still persists, restrict future contact to a particular form and/or frequency (e.g. in writing only).</li> </ul>
4	Threatening, aggressive, or intimidating behaviour	<ul style="list-style-type: none"> <li>• Advise the client in writing that such behaviour is unacceptable.</li> <li>• Report the incident to the PSNI. Cooperate with any subsequent investigation.</li> <li>• Arrange for a single, named member of staff to deal with all future calls or correspondence from the customer.</li> <li>• If the behaviour persists, restrict future contact to a particular form and/or frequency (e.g. in writing only).</li> <li>• If the client disregards these restrictions, limit future contact to via solicitor only.</li> </ul>
5	Deliberate damage of property belonging to the NICS or a VSU official	<ul style="list-style-type: none"> <li>• Report the incident to the PSNI. Cooperate with any subsequent investigation.</li> <li>• Advise the client in writing that such behaviour is unacceptable.</li> <li>• Arrange for a single, named member of staff to deal with all future calls or correspondence from the customer.</li> <li>• If the behaviour persists, restrict future contact to a particular form and/or frequency (e.g. in writing only).</li> <li>• If the client disregards these restrictions, limit future contact to via solicitor only.</li> </ul>
6	Threat of violence, whether face to face, on the telephone, or in writing	<ul style="list-style-type: none"> <li>• Report the incident to the PSNI. Cooperate with any subsequent investigation.</li> <li>• Advise the client in writing that such behaviour is unacceptable.</li> </ul>
7	Physical assault on a member of staff's family	<ul style="list-style-type: none"> <li>• Arrange for a single, named member of staff to deal with all future calls or</li> </ul>

Ref	Example of Unacceptable Behaviour / Incident	Restrictions that may apply
8	Physical assault on staff, a VSU contractor, or other member of the public in Castle Buildings	<p>correspondence from the customer.</p> <ul style="list-style-type: none"> <li>• If the behaviour persists, restrict future contact to a particular form and/or frequency (e.g. in writing only).</li> <li>• If these restrictions are disregarded, consider legal action, such as applying for an injunction or court order to prohibit contact/unacceptable behaviour.</li> </ul>
9	Stalking a member of staff (defined as <i>‘the wilful, malicious and repeated following and harassing of another person’</i> ).	<ul style="list-style-type: none"> <li>• If these restrictions are disregarded, consider legal action, such as applying for an injunction or court order to prohibit contact/unacceptable behaviour.</li> </ul>

8.5. The scenarios outlined in the table above are not exhaustive but should serve as a guide to the Grade 7 when making decisions on the imposition of proportionate restrictions in circumstances as they arise, whether in relation to isolated incidents or an accumulation of challenging behaviour over time.

8.6. The decision to list an individual on the UC register is not a decision that will be taken lightly. Wherever possible, VSU will give the customer the opportunity to modify their behaviour or actions before a decision is taken.

8.7. The Grade 7 must make a decision to classify a person as an unacceptable customer within 48 hours of being made aware of an incident and must:

- Issue a letter by registered post (template available at Appendix 4) to the individual classifying them as an unacceptable customer and set out details of any sanctions to be imposed on their dealings with VSU (there are exceptions in certain cases – see ‘disclosure of UC markings’ below). The details of data protection legal requirements for this action, consequence of the marking, recording of the marking, notifying of other organisations, recording of their future behaviour and review periods are included in the letter.

It is acknowledged that the above action could lead to further behaviour that would put staff at risk. If this is considered to be the case it is permissible to withhold this information from the customer. Each case must be judged on its own merits and the reasons for the supporting decision fully documented. In making these decisions the

Grade 7 should give particular consideration to the nature and severity of the original incident and any other relevant information;

- Ensure that the staff member who reported the incident, their line manager and the local TUS Safety Representative are advised of the unacceptable customer decision.

8.8. Once a customer has been classified as an unacceptable customer, a report on their behaviour should be made on each and every occasion they engage with VSU. This includes face to face, telephone and written contacts. (The proforma for this is at Appendix 5.) All completed reports should be passed to the Grade 7 who is responsible for the unacceptable customer classification for use in the review process.

## **9. Unacceptable Customer Register**

9.1. VSU will maintain details in the form of a register of persons classified as an unacceptable customer. The register is a protective and preventive measure to ensure the safety of staff and should be made available to all staff who have contact with members of the public or their representatives. It must be kept up-to-date, with access restricted to those staff who deal with members of the public.

9.2. A register of current unacceptable customers will be maintained and held securely. It will be the responsibility of the Grade 7 to classify an unacceptable customer and pass on the relevant details to others.

9.3. The register should contain the name and address of any customer, or member of the customer's household, classified as an unacceptable customer. Information on the reason behind the unacceptable customer marking will be held separately, in a secure container only accessible to the Grade 7, and will only be released to staff dealing with the customer, following an email request from the member of staff.

9.4. The Grade 7 must ensure that all relevant records are updated to show the marking and relevant information included in the unacceptable customer register (see flowchart at Appendix 6 and Unacceptable Customer Register at Appendix 7).

9.5. A person's placement on the unacceptable customer register will likely amount to sensitive personal data within the meaning of Section 1 of the

Data Protection Act 1998. It is necessary to ensure that such data is stored in accordance with the data protection principles. These require data to be:

- Processed fairly and lawfully and only if one of a limited number of conditions is met;
- Obtained for specific purposes and not processed incompatibly with those purposes;
- Adequate, relevant and not excessive;
- Accurate and as up-to-date as necessary;
- Processed in accordance with the rights of data subjects under the Data Protection Act;
- Kept secure and not transferred to non-EEA countries which do not ensure adequate protection.

9.6. Data security measures must be put in place to ensure that the unacceptable customer records cannot be accessed by any unauthorised persons. Information Asset registers should be updated accordingly.

## **10. Review of Unacceptable Customer Markings**

10.1. The Grade 7 who issued the unacceptable customer marking is responsible for carrying out a review after 12 months or immediately as circumstances change. To be effective the unacceptable customer marking should not be maintained indefinitely – it must be justified at the annual review.

10.2. The Grade 7 should consider:

- The nature of the original incident;
- The type of incident which led to the original decision;
- The number and type of contacts since the original incident;
- The customer's behaviour since the original incident;
- Any other relevant information.

10.3. If a decision is taken to remove the unacceptable customer marking the Grade 7 should inform the customer in writing immediately unless it has been agreed that this would aggravate the situation (paragraph 8.3 above) (Appendix 4). Any customer records and the unacceptable customer register (Appendix 7) should be amended accordingly and all relevant persons informed.

10.4. The flow chart at Appendix 6 covers this aspect and includes relevant contact details.

## **11. Liaison with the Commission for Victims and Survivors and the Victims and Survivors Service**

- 11.1. When an individual's name is listed on the VSU's unacceptable customer register, VSU will advise the CVS and the VSS of this in writing (Appendix 8).
- 11.2. VSU undertakes to advise the CVS and the VSS of any amendments made to this policy, and to keep both up-to-date in relation to its implementation.

## **12. Post-incident Support and Assistance**

- 12.1. Staff must be given every support by management following an incident. Line managers should:
  - Appreciate the feelings of those most affected by showing empathy;
  - Facilitate the sharing of ideas and observations (with individuals or teams) about incidents and discuss any action that could either prevent a recurrence or help staff to deal more effectively with a similar situation next time; and identify whether those affected by the incident (as a group or as individuals) would benefit from the support provided by Carecall – telephone Freephone 0800 3895 362. Carecall is a 24-hours-a-day, 7-days-a-week, confidential telephone counselling service with professional counsellors offering help with a wide range of personal and work-related problems. DHR should be informed of all incidents.

## **13. Conclusion**

- 13.1. This guidance covers the requirements for dealing with unacceptable behaviour from members of the public.
- 13.2. Any enquiries about this guidance should be made to the Grade 7.

## **14. Policy Review**

- 14.1. This policy will be reviewed on an annual basis and will be submitted to the Grade 5 for approval.

14.2. The VSU reserves the right to vary this policy as it deems appropriate to include compliance with any legal requirements.

SIGNED: *Patricia McIntyre*                      *Colin Moffett*  
                    VSU Grade 7                                      VSU Grade 7

SIGNED:                      *Ricky Irwin*

PRINT NAME:              RICKY IRWIN  
  
    Grade 5

DATED:                      22 June 2016

## **Appendix 1: Dealing with members of the Public**

The following points should be noted by VSU staff when dealing with members of the public:

### **Do**

- Treat all members of the public courteously and impartially, in a professional and polite manner.
- Be sensitive to the members of the public's needs and concerns.
- Recognise that some members of the public have physical, mental or personal problems which may influence their behaviour and that this should be taken into account in your dealings with them.
- Be patient, listen carefully to what members of the public say, and make allowances for any literacy, language barrier, or numeracy problems.
- Explain things clearly and simply and do not use abbreviations or jargon, to avoid misunderstanding.
- Prepare properly for engagement with members of the public when possible.
- Be honest and frank – if you are not sure the information you are giving is accurate, check and inform the member of the public that you are doing so.
- Refer to a line manager if your explanation is rejected.
- Always keep calm, do not allow yourself to be provoked.
- Present yourself in an impartial manner e.g. avoid dress code, display of symbols or emblems, use of language that could be interpreted as offensive.
- Call for assistance immediately if a member of the public becomes aggressive, and make sure you can get away quickly if necessary.
- Tell your line manager if a member of the public exhibited unacceptable behaviour or if you have reason to believe they are potentially violent.

### **Don't**

- Leave loose objects lying about which could be used as a missile or weapon.
- Engage with a member of the public who appears to be under the influence of drugs or alcohol.
- Keep a member of the public waiting longer than necessary.
- Provoke a member of the public through words or actions.
- Retaliate through words or actions.
- Try to arrest or detain an assailant.

VSU understands that individuals may act out of character in times of difficulty or distress. VSU does not therefore view actions or behaviour as unacceptable simply



because a complainant is assertive or determined. However, the actions or behaviour of complainants who are angry, demanding or persistent may result in unreasonable demands on VSU or unacceptable behaviour towards VSU staff.

### **Persistent customer behaviour**

VSU recognises that some complainants will not or cannot accept that VSU is unable to assist them further or provide a level of service other than that already provided. Complainants may persist in disagreeing with the action or decision taken in relation to their complaint or contact VSU persistently about the same issue. If a customer demonstrates behaviour that you consider is unreasonably persistent, consult your line manager. The line manager may then decide to restrict the customers' access.

### **Unacceptable customer behaviour**

Offensive or insulting customer behaviour, for example where a customer is rude or unpleasant or repeatedly uses inappropriate language, is unacceptable. Abusive or threatening customer behaviour, where a customer is threatening or intimidating to a particular member of staff or towards VSU, is also unacceptable. When dealing with these customers you should always remain calm and polite. Make the customer aware that their behaviour is unacceptable and you will have to end contact if they continue. If their behaviour continues inform them once again that contact will be ended and inform them how to make a formal complaint if they wish. Give the customer one last chance to change their behaviour/attitude before ending the contact, whether it is ending the phone call or asking them to leave the premises.

## **Appendix 2: Unacceptable Customer – Controls**

When deciding on suitable safety control measures for the risk of violence, the hierarchy of Risk Control should be followed. The emphasis must be firmly on preventive measures and these will take five main forms:

- Job design
- Procedures
- Equipment
- The Workplace Environment
- Information and Training

It is possible, if not probable, that a combination of control measures will be required to protect staff from work-related violence.

### **Job Design**

Whilst operational needs and constraints will have a significant impact on job design, consideration should be given to whether there are procedural changes that can be introduced that would reduce the risk of work-related violence. Examples include:

- Eliminating lone working and increasing staff levels at high-risk times. It should however be noted that increasing staff levels will not necessarily mean that the risk will be lower.
- Eliminating or minimising the handling of cash or other 'attractive' items.
- Allocating known difficult members of the public to more experienced staff.
- Changing the way information is sought from, or provided to, members of the public.
- Arranging meetings at the VSU office, or other neutral locations, where possible.
- Introducing systems for monitoring/communicating with personnel when away from the workplace – see NICS Lone Working Guidance.

### **Procedures**

It is important that a Safe System of Work is developed to ensure that staff act in a professional and safe manner, and are clear as to what action is required in different circumstances.

If members of the public attempt to intimidate staff within the VSU/NICS accommodation by using the media, VSU staff should approach the journalist or camera operator and ask them to stop recording as they have not been invited onto Government property. The members of the public should be told that the issue will

be dealt with on a one-to-one basis when the media have left. If the media are used on non-Government premises, VSU staff should consider withdrawing if the camera operator or journalist do not agree to stop the recording. EIS should be notified of any such incidents. Laura Holmes, Judith Wallwin and Jeremy Gardner in the First Minister's office, and Kathy Monaghan, Roisin Coleman and Gail McKibbin in the deputy First Minister's office should also be informed.

In the case of visits to other organisations, it is important that a dynamic risk assessment is also carried out to take account of changing situations and ensure suitable controls are adopted.

## **Equipment**

The provision of suitable equipment should be considered as a control measure.

Where equipment is provided care must be taken to ensure that it is, and remains, suitable, in good working order, and that users are appropriately trained and informed about use.

If personal alarms are being considered, it should be noted that assistance from the public cannot be guaranteed and should not be depended upon as a control measure. Personal alarms may serve a purpose of alerting work colleagues or disorienting an attacker.

The majority of staff use their private motor vehicle while on official business. Where a significant risk of staff being traced from the registration place of their private motor vehicle as been identified, consideration should be given to the use of hire vehicles. Managers should consult with the Grade 7 if they feel that there are exceptional or unusual circumstances in a particular case.

When mobile phones are being used it is essential that they are fully charged, in good working order, and that mobile phone coverage in the area being visited has been checked.

## **The Workplace Environment**

This centres on the physical aspects of the workplace. Risk Assessors and managers should liaise with the Premises Officer when considering the practicalities of environmental controls.

Examples include:

- Controlled access (swipe card, combination locks, etc);
- Removing/securing potential weapons in the workplace, including innocuous items such as furnishings, plant pots, etc;
- Improving lighting in appropriate areas;
- Fitting protective screens (though these can also antagonise members of the public and should only be considered where the risk assessment justifies such);
- Making waiting areas amenable e.g. comfortable chairs, pastel colours, scenic pictures, magazines to read, etc;
- Providing panic buttons/alarms and have staff ready and trained to respond;
- Use of closed circuit television (CCTV). Premises Officers should be able to advise on the area covered by CCTV in their specific building. *(There are specific legal requirements governing the use of CCTV – managers intending to use such equipment should ensure that these requirements have been met.);*
- Display of posters on walls in reception and meeting rooms informing clients of unacceptable behaviour.

## **Information**

It is important that accurate information is available for staff on possible areas where work-related violence is likely or has recently occurred.

A database, the VSU Unacceptable Customer Register, identifying recent incidents of unacceptable customer behaviour and associated issues is available to view on request.

Managers should ensure that relevant information on incidents is forwarded, through the Grade 7, for inclusion on the register.

Staff should check the register regularly to ensure that they are aware of current issues.

Risk Assessors and managers should consider the use of this database as part of their control strategy.

## **Training**

Staff should be adequately trained to deal with foreseeable situations. The level of training will vary, depending on the nature of the activity and the level of risk.

### Appendix 3: Form for reporting Unacceptable Customer Behaviour

<p>EMPLOYEE</p> <p>Name:</p> <p>Job Title:</p> <p>Section:</p>
<p><b>Date of Incident:</b></p> <p>Time:</p>
<p>DETAILS OF PERSON(S) RESPONSIBLE FOR INCIDENT</p> <p>Name(s) (if known):</p> <p>Address(es) (if known):</p> <p>Estimated age:</p> <p>Male / Female:</p> <p>Description (<i>physical and manner e.g. did the person appear to be under the influence of alcohol?</i>):</p> <p>Where did the incident occur?</p>

Describe the events leading up to and during the incident (attach a separate sheet if necessary):

**Witness(es)**

Name(s):

Address(es):

This section to be completed by line manager:

Outcome of incident

Effect on victim (e.g. injury, time off work):

Damage to personal property:

Damage to VSU/NICS property:

Details of follow-up action and aftercare:

PSNI

Legal action

Other? Please specify:

**Hospital treatment**

**Counselling**

**Line manager**

**DHR**

**Health & Safety Adviser**

RESTRICTED STAFF

Copy in restricted Unacceptable Customer records

Copy to be held on officer's Personal File

## **Appendix 4: Classification as an Unacceptable Customer Letter / Removal of Unacceptable Customer Marking Letter**

Dear **[insert name]**

### **RE: Unacceptable behaviour towards Victims and Survivors Unit Staff**

I am writing to you concerning an incident of unacceptable behaviour on **[date]** when I advised you **[insert details]**.

I must advise you that the Victims and Survivors Unit (VSU) takes a very serious view of the issue of unacceptable behaviour towards staff. On the basis of the information I have received about this incident, I must warn you that your treatment of VSU staff on **[insert date]** was totally unacceptable.

In the circumstances and in order to protect the health and safety of VSU staff, I now have no option but to modify the services that VSU provides to you. I have now instructed all VSU staff that from today they are **[insert details of sanctions agreed]**.

You have now been classified as an unacceptable customer and this information will be passed to other Northern Ireland Civil Service bodies and Arm's Length Bodies as appropriate.

If you require information on any matter, then you should put your request in writing to VSU at:

Victims and Survivors Unit  
The Executive Office  
Room E4.15  
Castle Buildings  
Stormont Estate  
Belfast, BT4 3SL

If you wish to make an appointment to meet with a member of staff to obtain information that you require, you must also submit a written request. Another member of VSU staff will be present at all times during any such meeting.

This situation will be reviewed in 12 months time.

Yours sincerely

**[Insert name]**



**Letter advising Customer of the Removal of an Unacceptable Customer Marking**

Dear **[insert name]**

**RE: Unacceptable behaviour towards Victims and Survivors Unit Staff**

As you know I wrote to you on **[date]** informing you that you had been classified as an unacceptable customer as I was of the opinion that you posed a potential threat due to **[describe incident in brief giving date]**.

I am now writing to inform you that this assessment has recently been reviewed and, in view of the fact that no further incidents have been reported, I have advised VSU staff and any other Northern Ireland Civil Service bodies and Arm's Length Bodies that we are informing you that you no longer pose a potential threat.

We remain committed to treating you in a fair and polite manner and therefore will continue to expect the same in return.

If you would like to speak to us about this letter please contact us on **[insert phone number]** during office hours.

Yours sincerely

**[Insert name]**

## **Appendix 5: Unacceptable Customer Reports**

### **Contact Record with Unacceptable Customer (UC)**

All contact with a known Unacceptable Customer must be recorded to assist with the annual review.

Customer name: \_\_\_\_\_

Customer phone number: \_\_\_\_\_

Customer address: \_\_\_\_\_

How was contact made? (e.g. phone, visit, etc)

Why was contact made?

Did the customer's behaviour give any indication that the Unacceptable Customer marking remains appropriate?

Reporting officer:

Name:

Title:

Date:

## Appendix 6: Flowchart of Recording and Review Process

### PRIOR TO CONTACT WITH CUSTOMERS

Staff dealing with customers must be provided with guidance on standards of conduct.

Suitable risk assessments must be carried out on all tasks dealing with customers and controls communicated to staff.

Where necessary training should be provided to staff.



Staff should check Unacceptable Customer Register prior to arranging contact with the customer to ensure they are not flagged as unacceptable



If customer is not flagged as an unacceptable customer no further action is needed.



If customer is flagged as an unacceptable customer, contact Grade 7 for further details of previous incidents and controls.

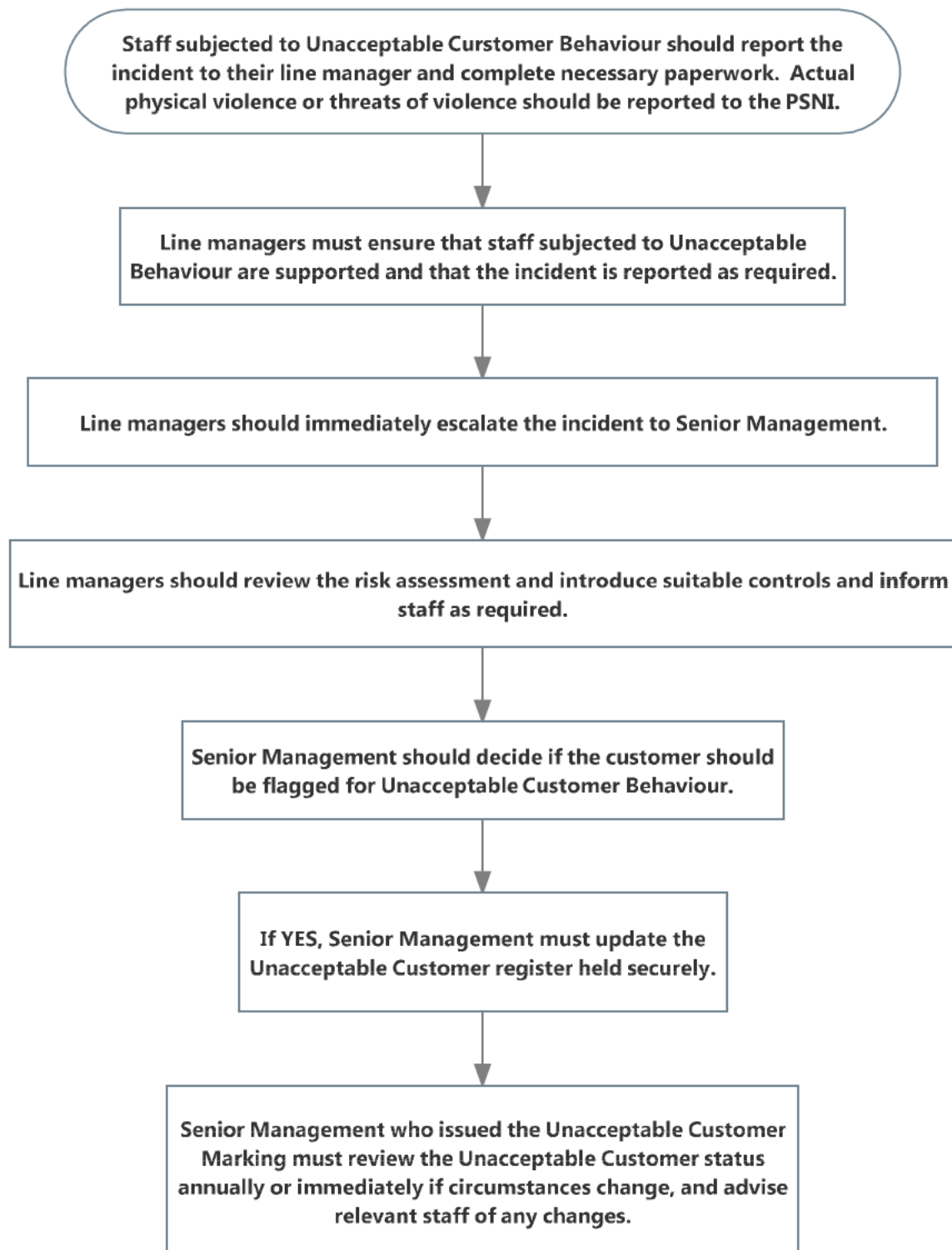
Any contact with a customer flagged as an Unacceptable Customer should be recorded and forwarded to Grade 7.

## HELPFUL CONTACT DETAILS

### PSNI Call Management Centre:

- Non-emergency calls and general enquiries: **0845 600 8000**
- Emergency calls: **999**
- Emergency text phone: **18000**
- An **emergency** is where serious injury has been caused or is threatened, or a crime is in progress and the suspects are near or at the scene.
- Police headquarters: **028 9065 0222**

## **IN THE EVENT OF AN INCIDENT OF UNACCEPTABLE CUSTOMER BEHAVIOUR**



## **Appendix 7: Unacceptable Customer Register**

The Unacceptable Customer Register should record the following fields, which are not exhaustive:

1. Customer Name
2. Address
3. Phone number
4. Date of Incident
5. Short Description of Incident
6. Name of Grade 7/Senior Manager recording Unacceptable Customer marking
7. Date Unacceptable Customer Marking Given
8. Date Review Due
9. Review Completed
10. Review Outcome
11. Date Next Review Due

**Appendix 8: Notification to the Commission for Victims and Survivors and the Victims and Survivors Service**

**[INSERT DATE]**

Dear **[insert name of Commissioner / VSS CEO]**

**UNACCEPTABLE BEHAVIOUR TOWARDS VSU STAFF**

In line with our Unacceptable Behaviour from Members of the Public policy I am writing to you concerning an incident of unacceptable behaviour on **[date]** when **[name of individual]** breached the policy by **[brief summary of incident]**.

In the circumstances, and in order to protect the health and safety of VSU staff, we have had no option but to modify the services that VSU provides to **[name of individual]**. I have now instructed all VSU staff that from today they are **[insert details of sanctions agreed]**. **[Name of individual]** has now been classified as an unacceptable customer and has been notified that the Commission for Victims and Survivors and the Victims and Survivors Service have been informed.

The situation will be reviewed in 12 months time.

Yours sincerely

**[Insert name]**