

Policy and Sustainability Committee

10:00am, Tuesday 22 August 2023

Protecting Colleagues from Unacceptable Behaviours Policy

Item number
Routine
Wards
Council Commitments

1. Recommendations

- 1.1 To approve the new Protecting Colleagues from Unacceptable Behaviours Policy.
- 1.2 To note that this Code has been reviewed and revised to address the recommendations agreed following the Independent Inquiry and Whistleblowing Culture Review by Susanne Tanner KC, with Pinsent Mason in 2021.

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2. Executive Summary

- 2.1 As part of the findings from the Independent Inquiry and Whistleblowing Culture Review in 2021 (“Inquiry and Review”) there was a recommendation to review all conduct related employment policies and, where appropriate, to revise.
- 2.2 This report focuses on the new Protecting Colleagues from Unacceptable Behaviours (“Protecting Colleagues”) Policy.
- 2.3 The new Policy brings together the principles currently outlined in the Violence at Work and Managing Customer Contact in a Fair and Positive Way policies and aligns with the organisations Complaint Policy. It is underpinned by our new Behaviours Framework and provides clarity on how to mitigate and manage any unacceptable behaviours against our employees including violence, aggression, bullying and harassment.
- 2.4 The Protecting Colleagues Policy replaces our Violence at Work Policy which was approved at Committee on 25 March 2014 and the Managing Customer Contact in a Fair and Positive Way (formerly Unacceptable Actions and Behaviours Policy) approved by Committee on 5 August 2014.

3. Background

- 3.1 This updated policy will action some of the policy-related recommendations of the Inquiry and Review which focus on conduct related policies, guidance and associated learning and systems. A review of the Violence at Work Policy commenced in 2021, as part of an internal audit review. It was agreed that this policy would be incorporated into the recommendations of the Inquiry and Review.
- 3.2 A working group was established with representation across the Council services to feed into the review. This group agreed that the existing Managing Customer Contact in a Fair and Positive Way Policy should be incorporated into the review to streamline the policy landscape and offer colleagues one source of advice and guidance.
- 3.3 In addition to this, we also sought feedback on the application and effectiveness of the existing policies through engagement with Trade Unions, line managers and Human Resources colleagues who are regularly involved in supporting the business through the relevant policy.
- 3.4 This policy has been developed jointly within HR and Health and Safety.

4. Main report

- 4.1 While the underlying principles of both policies remained fit for purpose, as good practice and due to the age of the policy, we undertook to review it through the lens of the Inquiry and Review recommendations.
- 4.2 The Violence at Work Policy outlines that the Council considers any harassment, violent or aggressive behaviour directed at our colleagues as unacceptable. All our people are entitled to work in a safe environment where they are fully supported when faced with unacceptable behaviour from any other person however that

unacceptable behaviour occurs. The policy focusses on service user on employee incidents only.

- 4.3 While the policy does outline that persistent harassment, including sexual and racial harassment, is defined as violence in the workplace, the policy approaches this subject matter through a Health & Safety preventative approach of risk assessments and role specific training needs. The policy then outlines how to manage and report any incidents which occur.
- 4.4 The Managing Customer Contact in a Fair and Positive Manner Policy is a service-led policy which outlines how the Council will manage actions that result in unreasonable demands on our services or unreasonable behaviour towards our colleagues from service users / customers. The policy also provides a framework in dealing with situations where actions become unacceptable as they involve abuse of our colleagues, stop us doing our work or providing a service to others. This policy also only focusses on service user on employee incidents. Our feedback from employee engagement sessions highlighted that this policy was not well known across the Council.
- 4.5 To streamline the policy landscape for colleagues, and provide one central reference document, it was proposed to consolidate these policies into one new Protecting Colleagues Policy which will be supported with dedicated toolkits / user guides for colleagues on prevention and management respectively.
- 4.6 The Policy outlines the Council's commitment to keeping our colleagues safe in the workplace, that no form of violence, aggression, bullying or harassment is acceptable and encouraging people to speak up.
- 4.7 The remit will also be expanded to focus on employee-on-employee incidents as well as service user on employee incidents.
- 4.8 Underpinned by Our Behaviours, the policy will seek to support the culture change within the organisation by raising awareness of these topics, outlining unacceptable behaviours, and providing managers with the tools to address issues and support colleagues.
- 4.9 The process that was agreed for managing services, i.e., the restriction or withdrawal of service, as outlined in the Managing Customer Contacts in a Fair and Positive Way Policy has been transferred to this policy. Warning letters will be issued to service users when their behaviour becomes of concerns, and any decisions for restricting / withdrawing services, as a result of continuous behaviours, will sit within the Directorates and service users will be provided with the opportunity to appeal any decision.
- 4.10 The policy will be supported by two user guides:
 - Management / Action – this user guide will outline to colleagues and line managers the steps they should take in mitigating and addressing unacceptable behaviours towards colleagues. It will outline detailed guidance for managers on risk assessments to support colleagues in areas where tolerance levels may be higher due to the nature of the work they are involved in or the service users they engage with as well as the type of work they do i.e., lone working. It will provide guidance for colleagues on how to report any incidents and outline the different mechanisms for support as well as how managers address incidents either through disciplinary action or restriction / withdrawing of services. We

have also taken the opportunity to align the reporting of prejudice-based incidents with other Health and Safety reporting within the organisation – it will now all be recorded and reported through the SHE portal.

- Prevention – this will be a brand-new user guide for the organisation and will focus on awareness raising, education and the preventative actions the organisation is taking in addressing bullying and harassment. It will outline what bullying and the different forms of harassment are as well as providing links to the current initiatives, learning, support and live D&I work ongoing within the Council. This is currently being developed in partnership with our Staff Networks and equality representatives.

- 4.11 The original name for the policy was Protecting Colleagues in the Workplace however feedback during Trade Union consultation suggested this policy also covered wider health and safety procedures and should be clarified to demonstrate what the policy was designed to protect colleagues from specifically.
- 4.12 Work has commenced with colleagues in Learning to pull together existing training resources already available to colleagues under the umbrella of Protecting Colleagues. This includes bullying and harassment and health and safety e-learning.

5. Next Steps

- 5.1 An implementation plan, including communications, will be put into effect to relaunch the policy and associated e-learning to raise awareness with colleagues and line managers.
- 5.2 It is hoped that we will tie in the launch with other organisational health, safety and wellbeing initiatives to protect colleagues in the workplace.

6. Financial impact

- 6.1 There is no material impact arising from this report.

7. Stakeholder/Community Impact

- 7.1 This policy meets our legal obligations in relation to formal consultation. The trade unions have been engaged on the new policy and are content with the proposed changes. This is a local collective agreement.
- 7.2 In addition to formal consultation, this policy has been assessed for possible impacts on vulnerable groups, people with protected characteristics, equality and human rights and economic factors as part of our integrated impact assessment. No negative impacts were identified, but positive steps to raise more awareness of issues such as bullying and harassment of individuals due to protected characteristics.

8. Background reading/external references

- 8.1 N/A

9. Appendices

- 9.1 Protecting Colleagues from Unacceptable Behaviours Policy.

Protecting Colleagues from Unacceptable Behaviour Policy

The Council (we) take our responsibility to ensure the safety, protection, and wellbeing of colleagues who deliver Council services very seriously. We aim to ensure a safe working environment for all colleagues.

We are committed to protecting all colleagues and creating a workplace where everyone is treated with dignity and respect by colleagues, managers, and work contacts. We are committed to protecting our colleagues from unacceptable behaviours including bullying, harassment, and discriminatory behaviour whether it originates from service users, Elected Members, members of the public or from other colleagues in the workplace.

We will not tolerate unacceptable behaviour directed towards colleagues. Any colleague who is subjected to unacceptable behaviour will be fully supported with appropriate action to address these behaviours and we will always prioritise the safety and wellbeing of our colleagues.

Author	Scope
Employee Relations and Policy Team, Human Resources, Corporate Services Directorate	This policy applies to all employees, consultants, casual/supply workers, agency workers, Elected Members, and volunteers.
Purpose	Review
The purpose is to outline positive behaviour in the workplace and to ensure appropriate support is provided to colleagues who encounter unacceptable behaviour in the course of their work, and to ensure that action is taken to address the behaviour in a fair and consistent manner.	The policy will be reviewed as and when a change to the existing policy deems this necessary, primarily because of changes to legislation or statute; agreement of new national terms and conditions of service or Government Policy; organisational change; or resulting from changes agreed through Trade Union Consultation.
Local Agreement	
This policy is a local collective agreement between the Council and our recognised Trade Unions. We will make every effort to ensure that it is maintained as a local collective agreement. Any changes will be made by agreement. If we cannot agree, either party can end the local collective agreement by giving four months' notice in writing, with the policy ceasing to apply to staff at the end of that period.	

Protecting Colleagues from Unacceptable Behaviour Policy	5
1 Policy Aims	6
2 Positive/Acceptable Behaviours	7
3 Unacceptable Behaviours	7
4 Roles and Responsibilities	11
5 Support for Colleagues	13
6 Managing Customer Contact	14

1 Policy Aims

The aim of this policy is to set expectations of behaviour in the workplace and to ensure colleagues are supported if they encounter unacceptable behaviour such as harassment, abuse, violent or aggressive behaviour in the course of their work.

The policy is designed to:

- outline positive behaviour whilst at work;
- provide a commitment from the Council to protect colleagues from unacceptable behaviour in the workplace;
- support managers to provide an effective response to unacceptable behaviour which is reported;
- provide a framework to take action against unacceptable behaviour and support colleagues to report unacceptable behaviour in the workplace.

This policy and associated user guide should be used in any case where a colleague reports unacceptable behaviour including harassment, abuse, violent or aggressive behaviour in the course of their work. This policy relates to reports of unacceptable behaviour by anyone a colleague may encounter as part of their working duties, including service users and members of the public.

This policy applies in the following contexts:

- anywhere on the Council premises;
- anywhere off the Council premises involving delivering work-related activities, social events, Council events or business trips;
- online on Council email, chat functions, intranet, and internet systems.

Central to this policy is the prevention of discrimination, bullying, harassment, victimisation, intimidation, and other unacceptable behaviour on any grounds and particularly in relation to the following protected characteristics that qualify for protection under the Equality Act 2010:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race and ethnicity;
- religion or belief;
- sex;
- sexual orientation.

2 Positive Behaviours

People are what make our organisation, and we want everyone to feel respected, included and to have a positive experience at work while contributing to our shared purpose of working together for the people of Edinburgh. Council business is largely based on contact between people and therefore mutual respect is critical to effective working relations and service provision.

All colleagues will be expected to demonstrate [our behaviours](#) of respect, integrity, and flexibility. This means everyone should be treated well and enabled to deliver their best work every day.

Through our behaviours, we aim to be:

- an organisation where we are inclusive, we promote equality, we treat people with fairness, understanding and kindness and we consider others in all our decisions and actions.
- an organisation where we are open and honest, we take responsibility, we build trust, and we pull together to do what's right for our residents, our colleagues, and our city.
- an organisation where we are open minded, we keep it simple, we adapt to provide great service and find better ways of doing things, and we embrace opportunities for shared working and learning.

The Council expects that all colleagues will conduct themselves in a professional way when interacting with others or when managing colleagues. We expect our managers to lead and manage employees. This includes assigning tasks and setting performance standards. It also involves dealing with employees in a respectful and constructive way if they fall below expected standards.

Acceptable behaviour at work applies to everyone in the organisation.

3 Unacceptable Behaviours

All colleagues are entitled to be treated with dignity and respect in their place of work – no matter where that is or who they are. We will not tolerate unacceptable behaviour in any form including violence, aggression, bullying or harassment.

Examples of unacceptable behaviour may include:

- threatening, aggressive and challenging words or behaviour;
- behaviour which is perceived as harassment, or which causes alarm or distress;
- criminal damage or graffiti;
- theft;

- physical assault;
- sexual harassment;
- online abuse or harassment e.g., via direct / text messaging, emails, social media channels;
- unwanted filming of an individual.

This list is not exhaustive.

The safety and wellbeing of our colleagues comes first. We recognise that some colleagues may be more likely to encounter aggressive, confrontational, or even threatening behaviour because of the type of work they carry out. We do not expect colleagues to tolerate unacceptable behaviour and we will take appropriate steps to ensure the working environment is safe for all colleagues.

We recognise unacceptable behaviour can be seen differently in services, for example in social care or education, where vulnerable service users may not always understand the impact of their behaviour. We will support colleagues to make the working environment safe through appropriate risk assessments and adapting our ways of working as appropriate.

Where incidents do occur, these will be investigated quickly, and appropriate actions taken in relation to those involved. Management action should take a person-centred approach to resolution and personal safety and colleagues should have the opportunity to discuss with their manager the impact that the behaviour had on them and the outcome they feel would be appropriate and, within the legal powers of the organisation, make them feel safe and secure in carrying out their roles in their place of work.

All allegations of a sexual nature, domestic abuse, physical violence, harassment, or stalking raised against Council employees (whether occurring during the course of work hours or on work premises or not) must be reported to the Monitoring Officer prior to the appointment of any investigator. The user guide provides more information on how this is completed.

Bullying and Harassment

A person's behaviour can amount to bullying or harassment even if they had no idea that it would be perceived that way. The impact on the victim is important.

What is bullying?

There is no legal workplace definition of bullying. In general, it is characterised as negative behaviour being targeted at individuals, repeatedly or persistently, over time. Bullying is generally considered to be behaviour that leaves the victim feeling threatened, intimidated, humiliated, isolated, vulnerable, or otherwise upset. It does not need to be connected to a protected characteristic.

Whilst this list is not exhaustive, such behaviours may include:

- ignoring or excluding you;
- giving you unachievable tasks or "setting you up to fail";
- spreading malicious rumours or gossip;
- giving you meaningless tasks or unpleasant jobs;
- making belittling personal remarks;
- undermining your integrity;

- withholding information deliberately;
- undervaluing your contribution – not giving credit where it is due;
- an abuse or misuse of the power or authority through means intended to unfairly criticise or injure the recipient.

Bullying can be physical, verbal, and non-verbal conduct. It can take various forms, from extreme behaviour involving violence and intimidation, through to subtle actions such as deliberate exclusion. It can also take place online with cyberbullying which is conducted via social networking channels, often using blogs or social networking sites to post photographs or offensive or threatening comments. Please refer to the [ICT Acceptable Use Policy](#) regarding the appropriate use of social media.

For the avoidance of doubt please note constructive and fair feedback about your behaviour or performance from your manager or colleagues is not bullying. It is part of normal employment and management routine and should not be interpreted as anything different.

What is harassment?

Harassment can relate to unlawful discrimination, which can be on the grounds of protected characteristics mentioned in section 1. It is unwanted contact that violates another person's dignity; or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Harassment takes many forms including physical, verbal, and non-verbal conduct. It can include comments, actions, jokes, or suggestions that may be viewed as demeaning and unacceptable to the recipient. It may be an isolated incident or repeated actions that may create a stressful working environment. Physical, verbal, and non-verbal conduct can all amount to harassment. So can things you say or do online, especially on social media.

This policy covers isolated or ongoing incidents of offensive behaviour or prejudice-based incidents. A prejudice-based incident is one that is perceived by the victim, or any other person, to be motivated by hostility or prejudice against an individual or group who have a protected characteristic. When someone treats another person less favourably because they either submit to such behaviour or refuse to do so, we also see that as harassment.

If a Council employee has demonstrated unacceptable behaviour the [Disciplinary Policy](#) should be followed.

If a service user or customer of the Council has demonstrated unacceptable behaviour towards a colleague working at the Council the Managing Services section of the Protecting Colleagues from Unacceptable Behaviour User Guide should be followed.

Where it is an Elected member who has demonstrated unacceptable behaviours towards a colleague, this will be managed in line with the [Members' Code of Conduct](#) and should be raised through the Head of Democracy, Governance and Resilience, the Monitoring Officer or the Chief Executive.

Informal resolution of complaints

It is preferable that complaints are dealt with informally where appropriate. The aim is to resolve issues quickly and reduce the impact on all involved.

It is important to make a distinction between behaviour that is perceived as causing offence or distress and behaviour which is merely causing annoyance. Sometimes the person might not understand the impact of their behaviour on someone else and making them aware of it can stop the behaviour and resolve the matter quickly.

It is important to recognise that unacceptable behaviour can be unintentional and that, in such cases, the employee being complained about can suffer similar distress to the employee who raised the concerns. In such circumstances, the manager should make sure that both parties are provided with advice and support.

Managers can access advice, assistance, and support in dealing with a matter informally through [askHR](#).

Formal resolution of complaints

It is not always possible to resolve issues informally. If you find yourself in that situation, you should follow our Grievance Policy. We will treat your complaint in confidence, as far as is possible, and if we find that you have been the victim of harassment or bullying, we will take steps to stop it continuing or recurring.

The Council's [Disciplinary Code](#) stipulates that, in serious cases, bullying and harassment may constitute gross misconduct and, where this is established, gross misconduct will normally result in summary dismissal. In some cases, bullying and harassment can be unlawful and result in discrimination claims, criminal claims for assault or civil claims for harassment or negligence.

If we think it necessary, we may separate you from the person you are complaining about while we investigate. If that involves moving you on a temporary basis, or even asking you to stay at home during the investigation, it is not a pre-judgment of your complaint. It is simply us trying to stop things getting worse during the investigation.

If we decide that your complaint is not upheld, we will explain why. Either way, we will look at ways of addressing your relationship with the person you accused.

Occasionally, people make complaints knowing they are not true. They might do this to avoid or deflect disciplinary action. We view any complaint made in bad faith as an act of misconduct and this will normally lead to disciplinary action. In some cases, bad faith complaints may lead to summary dismissal for gross misconduct.

If you make a complaint about unacceptable behaviour including bullying and harassment, you should not be victimised as a result. If you believe that has happened to you, you must tell your manager or HR as soon as possible.

Involving the police

Some forms of unacceptable behaviour may be serious enough to constitute a criminal offence. Despite best efforts to mediate the risk of unacceptable behaviour towards our colleagues, there are times when it may be necessary to involve the police in an investigation. Where the colleague believes the situation requires Police involvement, for example when they believe they may have been the victim of criminal behaviour, managers will support colleagues in doing so.

Please see Protecting Colleagues from Unacceptable Behaviour User Guide for further details.

4 Roles and Responsibilities

Managers and colleagues have a vital role to play. We need everyone to identify, challenge and report unacceptable behaviour and to act in accordance with the policy and associated guidance. We also need to create an environment where colleagues feel safe, confident, and well supported to challenge and report incidents.

We want to promote a culture where employees can raise concerns without fear of victimisation or recrimination but in the knowledge that complaints shown to be malicious or vexatious will lead to disciplinary action.

Colleague responsibilities

- protect the health, safety and wellbeing of themselves and others at work;
- treat others with dignity and respect and demonstrate Our Behaviours actively in their work;
- complete safety or wellbeing related learning and development opportunities, as appropriate and apply the learning to the workplace;
- be aware of relevant policies and procedures to protect health and safety in the workplace;
- co-operate fully with measures provided for their safety;
- report incidents, using the appropriate route, as soon as possible.

Manager responsibilities

- promote a culture where abusive, aggressive, or violent behaviour is not tolerated;
- as a people leader, encourage and empower their teams to conduct themselves appropriately through role modelling of Our Behaviours;
- ensure their own understanding of acceptable language and behaviour is up to date;
- carry out individual and team risk assessments, as appropriate;
- ensure colleagues are well supported and aware of the advice, they know how to speak up and / or record incidents;
- support colleagues to complete safety or wellbeing related learning and development opportunities, as appropriate;
- take all complaints seriously and approach with sensitivity;
- investigate all reported incidents thoroughly and ensure that details are recorded on the required systems and with the relevant authorities, for example, Police Scotland;
- request assistance from human resources, occupational health, health & safety, and/or the employee assistance programme, as appropriate;
- if an incident occurs ensure the affected employee is supported immediately after;
- ensure colleagues are fully supported to return to the workplace following any incident.

Health and Safety Team

- the health and safety team will triage all reports of violence resulting in injury with a view to ensuring compliance with the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations. This means where an incident of violence has resulted in injury and this leads to an absence from work for more than 7 days, the team will make a report to the Health and Safety Executive;

- the health and safety team will act as a point of advice for managers seeking to manage the risk of violence within the workplace;
- the health and safety team will provide quarterly statistical reporting of violent incidents to the Directorate Health and Safety Groups/Committees to support monitoring and responses to incident trends.

Risk assessments

Being able to identify potential risks is essential to help us manage them. Managers must ensure risk assessments are in place for all colleagues who work in frontline services (those with direct access to the public and service users). Information gathered at this stage will help inform what measures we can take to avoid or reduce future risk.

Details of how to carry out these risk assessments and reviews can be found in the Protecting Colleagues from Unacceptable Behaviour User Guide.

In general risk assessments involving unacceptable behaviour (including risks of verbal and physical violence) must include:

- details of colleague contact with service users or members of the public;
- analysis of the adequacy of existing preventative arrangements;
- relevant information from previous (violent) incident reports;
- consideration of the prior experience and training of colleagues;
- comments from trade union safety representatives, where appropriate;
- details of identified risks and mitigating actions agreed to reduce risk.

Managers must record risk assessment data and review regularly to reflect any changes to work activity or new information that may become known, such as newly identified risks for the colleague.

Information on risk assessments can be found on the [Orb](#).

Confidentiality

Allegations of unacceptable behaviour can raise strong feelings and are always serious. This is why all parties involved have an obligation to maintain confidentiality as far as possible. This applies at every stage, including the investigation and the outcome.

If you make a complaint and do not maintain proper confidentiality at any time during the process, or you are interviewed in connection with someone else's complaint and likewise fail to maintain confidentiality, you may face action under our disciplinary policy. This could lead to dismissal for gross misconduct.

5 Support for Colleagues

We recognise we have a duty to all employees to protect their health, safety and wellbeing at work. On occasion, despite all reasonably practicable measures being taken, colleagues will encounter abusive, aggressive, or violent behaviour in the workplace.

Unacceptable behaviour at work may result in colleagues suffering physical, emotional or psychological reactions to their experiences. It is essential that the management response to these situations is quick, sympathetic, and supportive.

Support immediately after an incident

Managers should provide colleagues with post-incident support, ensure they are physically safe, and if required have access to medical treatment.

Colleagues should be advised of the [Employee Assistance Programme](#) and directed to the 24-hour helpline.

Managers should investigate the incident and inform appropriate internal managers (including the health and safety team and senior managers) and any external services as appropriate, for example the police.

Managers should record the incident on the on-line [SHE Portal Form](#).

Additional support after an incident

In all cases colleagues should be offered the opportunity to discuss the incident after the event with their manager and through our Employee Assistance Programme.

Managers can also refer colleagues to our occupational health service for additional support, if required.

Managers must also consider what steps can be taken to avoid a future incident, including a potential debrief with those involved, and update any relevant risk assessments.

We will work to protect colleagues from similar incidents. Where an incident is particularly serious, we may take appropriate legal action as part of our response to that incident. For example, we may support the police in pursuing a criminal prosecution or seek an interdict to prevent an assailant approaching a particular employee or entering Council premises.

Further guidance can be found in the Protecting Colleagues from Unacceptable Behaviour User Guide.

6 Managing Services

The safety and wellbeing of our colleagues comes first. We recognise that some colleagues may be more likely to encounter aggressive or unacceptable behaviour because of the type of work they carry out. We do not expect colleagues to tolerate unacceptable behaviour and will take appropriate steps to ensure the working environment is safe for all colleagues.

Customer is defined in this policy as anyone the Council works with, provides a service to, or supports. This includes residents, businesses, visitors, or someone acting on behalf of a customer e.g., a Councillor, parent/carer or relative.

Unacceptable behaviour from customers may include all those mentioned in section 3 and:

- unreasonable use of the complaints process;
- unreasonable levels of contact;
- unreasonable demands.

This list is not exhaustive.

We will always work towards resolving a solution that maintains colleague safety whilst continuing to provide necessary services. However, we will address unacceptable behaviour firmly and consistently which may mean restricting or changing access to a service when we consider a customer's actions to be unacceptable. Changing the service provided may mean altering who is providing the service or in what way the service is delivered.

Further guidance on restricting or changing access to services can be found in the Protecting Colleagues from Unacceptable Behaviour User Guide.

Any employee who directly experiences aggressive or abusive behaviour from a customer has the authority to deal immediately with that behaviour in a manner they consider appropriate to the situation and in line with this policy.

With the exception of such immediate decisions taken at the time of the incident, decisions to restrict or change contact with the Council are only taken after careful consideration of the situation by a senior manager. We will give the customer the opportunity to change their behaviour or action before a decision is taken

The decision to withdraw services can only be made by a Service Director and only after all other options to manage the situation have been considered.

Services may be withdrawn when there has been:

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- abusive or threatening behaviour towards employees or other service-users;
- persistent intimidation, bullying or harassment despite warnings;
- physical assault on an employee or other service-user.

This list is not exhaustive.