



Persistent & Vexatious Complaints Policy

**This policy was formally adopted by the Town Council at
the Town Council meeting held on**

16th September 2025

Signed *A. Beaumont*.....
Chair of Council

Signed..........
Town Clerk

Introduction

This policy sets out Keynsham Town Council's position on persistent, vexatious or abusive complaints, demand and/or repeated requests for information including Freedom of Information requests and how they will be dealt with.

Such correspondence/communications from a minority of individuals takes up a disproportionate amount of resources and can result in unacceptable stress for the Clerk and Councillors.

It is important that the use of this procedure does not prevent people from accessing services to which they have a statutory entitlement. It is designed to ensure that the rights of service users are protected, whilst ensuring that scarce resources are used fairly and effectively and that the Clerk and Councillors receive a reasonable degree of protection from the stress that can be caused by persistent or vexatious communications and complaints.

This procedure is not designed to address violent or threatening behaviour which needs an urgent response.

In applying restrictions, careful consideration will be given to balancing the rights of the individual against the need to ensure that Keynsham Town Council staff and Councillors do not suffer any disadvantage or undue stress that can be caused by persistent or vexatious communications and complaints and the resources of the organisation are used as effectively as possible.

The key question Keynsham Town Council will ask is whether the request is likely to cause a disproportionate or unjustified level of disruption to business, irritation or distress. Keynsham Town Council has a legal duty under the Health and Safety at Work etc Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare at work of its employees, members and contractors.

Defining persistent and vexatious communications or complaints

Identifying a Vexatious Request. A Requestor and anyone acting on their behalf may be deemed to be vexatious where contact with them shows that they meet one or more of the following criteria:

Abusive or aggressive language

The tone or language of the Requester's correspondence goes beyond the level of criticism that a Public Authority or its employees should reasonably expect to receive.

Burden on the organisation

The effort required to meet the request will be so grossly oppressive in terms of the strain on time and resources, that the Authority cannot reasonably be expected to comply, no matter how legitimate the subject matter or valid the intentions of the Requester.

Personal grudges

For whatever reason, the Requester is targeting their correspondence towards a particular employee or office holder against whom they have some personal enmity.

Unreasonable persistence

The Requester is attempting to reopen an issue which has already been comprehensively addressed by the Town Council.

Unfounded accusations

The request makes completely unsubstantiated accusations against the Town Council or specific employees.

Intransigence

The Requester takes an unreasonably entrenched position, rejecting attempts to assist and advise out of hand and shows no willingness to engage with the Town Council.

Frequent or overlapping requests.

The Requester submits frequent correspondence about the same issue or sends in new requests before Town Council has had an opportunity to address their earlier enquiries.

Deliberate intention to cause annoyance.

The Requester has explicitly stated that it is their intention to cause disruption to Town Council or is a member of a campaign group whose stated aim is to disrupt the Authority.

Scattergun approach

The request appears to be part of a completely random approach, lacks any clear focus, or seems to have been solely designed for the purpose of 'fishing' for information without any idea of what might be revealed.

Disproportionate effort

The matter being pursued by the Requester is relatively trivial and the Town Council would have to expend a disproportionate amount of resources in order to meet their request.

No obvious intent to obtain information.

The Requester is abusing their rights of access to information as a means to vent their anger at a particular decision, or to harass and annoy the Town Council, for example, by requesting information which the Town Council knows them to possess already.

Futile requests

The issue at hand individually affects the Requester and has already been conclusively resolved by the Town Council or subjected to some form of independent investigation.

Frivolous requests

The subject matter is inane or extremely trivial and the request appears to lack any serious purpose. The request is made for the sole purpose of amusement.

Using the procedure

If the Clerk or Councillors identify behaviour that they think exhibits these characteristics, and which they believe may be persistent or vexatious, they should form a Working Group consisting of the Chair of Council, Vice Chair of Council and three members of the Council.

If the Working Group agree with the assessment, they should prepare a confidential paper for the full Council stating why they consider the complaint or communications to be persistent or vexatious, including its effect upon the Clerk, Councillors and/or the Town. This should include a list of communications over the last 3 – 6 months via email, telephone and letter, including information about whom the communications were addressed to, how many people/organisations were copied in on each occasion, and a brief description of each item of communication.

Handling communications and complaints that have been assessed as persistent or vexatious.

If the Council agree with the assessment that the complaints meet the criteria of being persistent and/or vexatious, the Town Clerk will write to the correspondent advising them that their complaint and/or communications have been determined to be persistent or vexatious and giving the reason for that decision. The letter should state that any future correspondence will be considered to see whether it raises any substantive new issue(s). The correspondent should be advised that if no substantive new issue is raised, any future communications will not receive a response.

There is no route of appeal against the decision that a complaint or communications is persistent or vexatious.

Any future correspondence will be passed to the Working Group for consideration. They will report to the Council who will decide whether any genuinely new and substantive issues have been raised. If there are none, then no response is required. If the Council consider it to be appropriate, they may ask the Town Clerk to acknowledge the first 2 or 3 pieces of correspondence, referring the correspondent to the letter advising them of the decision that their communications has been determined to be persistent or vexatious. After that, however, no response or acknowledgement should be sent.

If future correspondence does raise significant new issues, it should be considered and responded to.

All responses and communications should come from the Town Clerk in order to prevent 'scattergun' correspondence.

Further advice and guidance

Defining complaints and/or communications as persistent or vexatious is a very serious step and only undertaken as a last resort. For that reason, it is essential that a decision to treat communications or complaints as persistent or vexatious is evidence-based and taken by the whole Council.

Any concerns about a particular correspondent should be discussed with the Chair of Council in the first instance.

In connection with this policy Keynsham Town Council is also committed to its Data Protection Policy.

Amendment History

Paragraph	Detail	Committee or Town Council	Approval date
Original	Initial version	F & P Committee	12 th September 2023
Original	Initial version	Town Council	19 th September 2023
Review due	Review	F&P Committee	9 th September 2025
Review due	Review	Town Council	16 th September 2025
Review	Next review	F&P Committee	July 2027