

POLICY		Responsible Department	Governance
		Original Adoption Date	New Policy
		Current Adoption Date	24.09.2026
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UNREASONABLE CONDUCT	
Latest Review Changes	New Policy
Previous Council Reviews	N/A

Applicable Legislation

<p>Local Government Act 1999 (SA)</p> <p>Online Safety Act 2021 (Cth)</p> <p>Work Health and Safety Act 2012 (SA) and Work Health and Safety Regulations 2012 (SA)</p>
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Related Policies

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Related Procedures

<p>Council's Dealing with Aggressive, Violent or Threatening Customers SOP</p> <p>Council's Customer Service / Complaints Handling Policy</p>

Reference Documents

<p>City of Mount Gambier - Unreasonable Conduct Policy</p>
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1. POLICY STATEMENT

This policy should be read together with Council's Dealing with Aggressive, Violent or Threatening Customers Standard Operating Procedure (SOP), which addresses immediate, in-the-moment safety responses to aggression. This policy governs the longer-term management of a customer's access to Council services following repeated or serious unreasonable conduct.

2. INTRODUCTION

Roxby Council is committed to being accessible and responsive to all customers who contact us for assistance, service, or to raise a concern. At the same time, our ability to respond effectively to the community depends on our capacity to do our work efficiently, the health, safety and security of our staff, and our ability to allocate Council's resources fairly across all the people we serve.

When a customer behaves unreasonably in their dealings with Council, this can significantly affect our ability to respond to them and to other members of the community. Council will therefore take proactive and decisive action to manage any customer conduct that unreasonably affects Council and will support staff to do the same in accordance with this policy.

All Council staff are authorised and expected to apply the strategies set out in this policy.

3. SCOPE

This policy applies to all unreasonable conduct by members of the community, whether directly or indirectly, in relation to services delivered by Council. The Policy covers interactions with elected members, staff, contractors, work experience students and volunteers of Council.

4. OBJECTIVES

This policy has been developed to help all staff members consistently and confidently manage instances of unreasonable conduct. It aims to ensure that staff:

- Feel confident and supported in taking action to manage unreasonable conduct.
- Act fairly, consistently, honestly and appropriately when responding to unreasonable conduct.
- Understand their roles and responsibilities in relation to managing unreasonable conduct, and the limits of what frontline staff may decide versus what requires management approval.
- Understand the circumstances in which it may be appropriate to change or restrict a customer's access to Council services.
- Have access to strategies for managing unreasonable persistence, demands, lack of cooperation, unreasonable arguments and unreasonable behaviour.
- Are aware of the process for recording, reporting, reviewing and appealing decisions made under this policy.

5. DEFINITIONS

Definitions for the purpose of this policy are detailed in the below table:

TERM	DEFINITION
Customer	A customer may be a person, a group, or a separate legal entity (such as a company or organisation)
Duress alarm	A safety device, available at some Council facilities, that staff can activate to call for urgent assistance during a threatening or unsafe situation. Staff should familiarise themselves with the location and operation of duress alarms at their workplace as part of their induction.

Duty of care	A legal obligation requiring Council to take reasonable steps to protect the health, safety and wellbeing of its staff, including protecting them from harm caused by third parties such as aggressive or abusive customers. Council's duty of care is one of the key justifications for restricting a customer's access under this policy.
EAP (Employee Assistance Program)	A confidential counselling and support service available to Council staff, including trauma counselling following a distressing incident such as an abusive customer interaction. Staff can request the details of Council's EAP from the People & Culture Manager.
Facility Access Restriction	A restriction placed on a customer under this policy that excludes them from entering a specific Council facility (such as Roxby Link) for a defined period, in response to persistent or serious unreasonable conduct occurring in person at that facility. Unlike a "writing only" restriction, which limits the method of contact, a facility access restriction limits physical attendance.
Frivolous or Vexatious	In the context of legal or complaints-related terminology, frivolous, or sometimes trifling, typically means something trivial, without merit, or not worth serious consideration. Vexatious has the meaning of being deliberately annoying, troublesome, or intending to cause harassment.
Occupier	The person or organisation in legal possession and control of a property. As the occupier of its facilities, Council has the right to decide who may enter its premises, and to refuse or withdraw that permission where necessary for safety or orderly operation.
Ombudsman (SA Ombudsman)	An independent statutory office that reviews complaints about the actions and decisions of South Australian government agencies, including local councils. A customer who is dissatisfied with a decision made under this policy, after exhausting Council's internal appeal process, may seek external review from the SA Ombudsman.
SAPOL (South Australia Police)	The state police service. Council may refer serious, threatening or unlawful customer conduct to SAPOL where it gives rise to safety concerns for staff.
Skytrust	Council's system for logging workplace incidents, including Unreasonable Conduct incidents. All unreasonable conduct incidents must be recorded in Skytrust so they can be tracked over time and used to identify repeat or escalating conduct.
SOP (Standard Operating Procedure)	A documented set of step-by-step instructions that tells staff exactly what to do in a specific situation. In this policy, "the SOP" refers to Council's Dealing with Aggressive, Violent or Threatening Customers SOP, which covers immediate, in-the-moment safety responses during an incident.
Staff	Any reference to 'staff' in this policy is also intended to include members, contractors, work experience students, volunteers and any other group to which Council would reasonably owe a duty of care, unless expressly stated otherwise.

Trespass	Entering or remaining on Council property without permission, including remaining on the premises after being asked to leave, or attending during an active Facility Access Restriction. Council may ask South Australia Police to remove a person who is trespassing.
Unreasonable Conduct	The umbrella term used throughout this policy to describe behaviour that, because of its nature or frequency, raises substantial health, safety, resourcing or equity concerns for Council, its staff, other members of the public, or the person themselves. Unreasonable Conduct is broken down into five categories: unreasonable persistence, unreasonable demands, unreasonable lack of cooperation, unreasonable arguments, and unreasonable behaviour.
Unreasonable Behaviour	Conduct by a customer that is unacceptable in any circumstances, regardless of the customer's frustration or distress, because it compromises the health, safety or security of Council staff, other customers, or the customer themselves. This includes aggression, verbal abuse, or derogatory, racist or defamatory remarks; harassment, intimidation or physical violence; rude, confronting or threatening correspondence (written or electronic); threats of harm to self or others, or threats to damage property; and stalking, whether in person or online.
Warning Letter vs First and Final Letter	A Warning Letter puts a customer on notice that their conduct is unacceptable and explains what will happen if it continues, it does not itself impose any restriction. A First and Final Letter is used where conduct has continued after a warning, or is serious enough to warrant immediate action, and it takes effect immediately: Council ceases accepting telephone contact from the customer from the date the letter is issued.
WHS (Work Health and Safety)	The legal framework and set of obligations requiring Council to protect the health and safety of its workers, including from psychological harm caused by aggressive or abusive customer conduct. Council's WHS obligations arise under the <i>Work Health and Safety Act 2012 (SA)</i> .
"Writing only" restriction	A restriction placed on a customer under this policy that requires all future contact with Council to be made in writing (by a specified channel, such as email or post) rather than by telephone or in person. A writing-only restriction applies only to the method of contact, Council will still consider the substance of any genuine enquiry raised respectfully in writing.

6. DEFINING UNREASONABLE CONDUCT

6.1 What is Unreasonable Conduct

Most customers act reasonably and responsibly in their interactions with us, even when they are frustrated, distressed or angry about their situation.

In a small number of cases; however, a customer's conduct becomes inappropriate or unacceptable, despite Council's best efforts to assist them. Unreasonable conduct is any behaviour by a current or former customer which, because of its nature or frequency, raises substantial health, safety, resourcing or equity concerns for Council, its staff, other customers, or the customer themselves.

Unreasonable conduct generally falls into one or more of the following five categories.

6.1.1. Unreasonable persistence

Continued, incessant conduct that has a disproportionate impact on Council's time and resources, such as refusing to accept a final decision that has been properly considered,

repeatedly demanding review without new grounds, or contacting multiple staff or Council members to seek a more favourable response to the same issue.

6.1.2. Unreasonable demands

Demands, express or implied, that have a disproportionate impact on Council, such as insisting on a particular outcome, staff member or level of contact that is not appropriate or warranted, or demanding services beyond what Council is able to provide.

6.1.3. Unreasonable lack of cooperation

An unwillingness or inability to cooperate with Council's staff, systems or processes in a way that creates a disproportionate burden, such as providing information in a disorganised or incomplete way, or refusing reasonable instructions without justification.

6.1.4. Unreasonable arguments

Arguments that are not based on reason or evidence, that are false, inflammatory, or defamatory, or that lead a customer to reject all valid contrary explanations.

6.1.5. Unreasonable behaviour

Conduct that is unacceptable in all circumstances, regardless of how frustrated or distressed a customer may be, because it compromises the health, safety or security of staff, other customers, or the customer themselves. Examples include:

- Aggression, verbal abuse, or derogatory, racist or defamatory remarks.
- Harassment, intimidation or physical violence.
- Rude, confronting or threatening correspondence (written or electronic).
- Threats of harm to self or others, or threats to damage property.
- Stalking, whether in person or online.
- Abusive, threatening, defamatory or harassing comments about Council staff posted on social media or other public online platforms.

Council recognises that abuse directed at staff is not limited to direct contact with Council. Public comments made on social media or other online platforms that name, identify or are clearly directed at a Council staff member, and which are abusive, threatening or defamatory, will be treated as a form of unreasonable behaviour under this policy. Such conduct should be reported (with screenshots where possible) to your Manager/Team Leader/Supervisor/Work Group Coordinator, who may refer the matter to the relevant platform for removal, to Council's communications team, or to South Australia Police where the content is threatening. Restricting a customer's direct contact with Council under section 5 does not require or depend on any action being taken regarding social media conduct, and vice versa.

Council has a zero-tolerance approach to any harm, abuse or threats directed towards its staff. Conduct of this kind will be managed under this policy and Council's Dealing with Aggressive, Violent or Threatening Customers SOP, in accordance with Council's duty of care and work health and safety obligations under the *Work Health and Safety Act 2012 (SA)*, and may be reported to South Australia Police.

7. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES
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All Staff	<p>All staff are responsible for familiarising themselves with this policy and the Individual Rights and Mutual Responsibilities set out at Appendix A, and for explaining these to customers who display early signs of unreasonable conduct. Staff are responsible for recording and reporting unreasonable conduct incidents using the Incident Form at Appendix B within one business day of the incident occurring.</p> <p>Frontline staff may use in-the-moment strategies consistent with the Dealing with Aggressive, Violent or Threatening Customers SOP (for example, calmly warning a customer or ending a call). Any decision to formally change or restrict a customer's ongoing access to Council services must be made at management level, as set out below.</p>
Managers/Team Leaders/Supervisors/Work Group Coordinators	<p>All Managers/Team Leaders/Supervisors/Work Group Coordinators are responsible for receiving Unreasonable Conduct incident reports, consulting with relevant staff, and recommending the appropriate course of action. They are responsible for updating the Unreasonable Customer Contact Register (Doc ID #416568) when an incident of unreasonable conduct occurs, recording all cases where this policy is applied.</p>
Chief Executive Officer/Executive Leadership Team	<p>The Chief Executive Officer/Executive Leadership Team has the authority to formally change or restrict a customer's access to Council services in accordance with this policy, taking into account the criteria at section 9.2, and aiming to impose the least restrictive option that will effectively manage the customer's conduct. The aim of any restriction is not to punish the customer, but to manage the impact of their conduct on Council and its staff.</p>

8. RESPONDING TO AND MANAGING UNREASONABLE CONDUCT

Unreasonable conduct will generally be managed by adapting how Council interacts with or delivers services to the customer. Restrictions may address:

Who: limiting the customer to a single, nominated point of contact.

What: restricting the subject matter Council will respond to (for example, one issue per month).

When: limiting the time, day or frequency of contact.

Where: limiting face-to-face contact to secured areas, by appointment only, or through a support person.

In serious cases, this may extend to excluding the customer from a specific Council facility for a defined period (see Facility access restrictions below).

How: limiting the method of contact, including restricting a customer to written communication only ('writing only'), restricting telephone contact, or, as a last resort, terminating Council's engagement with the customer altogether.

8.1 'Writing only' restrictions

Where a customer is restricted to writing only, they will be clearly advised of the specific channel(s) they may use, for example, Australia Post, or email to a single nominated Council address. Correspondence received in breach of this restriction may be returned to the customer or read and filed without a response.

8.2 Telephone restrictions

Where a customer's telephone conduct has been persistently rude, threatening, abusive or aggressive, Council may restrict their telephone access, for example, ceasing to accept telephone calls from the customer altogether and requiring all future contact to be made in writing, as contemplated in the warning letter template at **Appendix D**.

8.3 Facility access restrictions

Where a customer's conduct in person at a Council facility (such as Roxby Link) has been persistently rude, threatening, abusive or aggressive, Council may restrict the customer's physical access to that facility for a defined period. This is a different type of restriction to those above: rather than limiting how a customer contacts Council, it limits the customer's ability to physically attend a specific Council facility. This reflects Council's right, as occupier of its premises, to refuse entry where necessary to protect the safety of staff, other patrons, or the orderly operation of the facility. A facility access restriction will be communicated in writing, using the template at **Appendix G**

8.4 Complete termination of contact

In rare cases, and only as a last resort, the CEO may decide that Council will have no further contact with a customer. This will only occur where the customer is unlikely to modify their conduct and their behaviour poses a significant risk to staff or others, for example, repeated abuse, threats of harm, or unlawful conduct. Such cases will also be reported to South Australia Police.

9. PROCEDURE FOR CHANGING OR RESTRICTING A CUSTOMER'S ACCESS

9.1 Consultation

On receiving an unreasonable conduct incident report, the relevant Manager will discuss with the relevant staff member the circumstances of the incident, its impact on Council and staff, the customer's response to any prior warnings, and any action already taken.

9.2 Criteria to be considered

Before deciding on a course of action, the Managers / Team Leaders / Supervisors / Work Group Coordinator will review the customer's prior conduct and history with Council, and consider:

- Whether the conduct involved overt aggression, threats or violence (which is unacceptable in all circumstances).
- The merits of the customer's underlying concern or request.
- The likelihood that a formal warning will change the customer's conduct.
- Whether a restriction will be effective, and whether it will unduly affect the customer's ability to meet any obligations they have to Council.
- Whether the customer's personal circumstances (for example, disability, illness, language barriers or personal crisis) may have contributed to the conduct, and whether this affects the appropriateness of a given restriction.
- Whether the response was proportionate to the customer's conduct.

9.3 Warning letter

Unless the customer's conduct poses an immediate risk requiring urgent action, Council will first issue a written warning (see **Appendix D**). The warning letter will describe the incident(s), explain why the conduct is unacceptable, set out the restriction(s) that may follow if the behaviour continues, and provide contact details for any questions.

9.4 Notification letter

If the conduct continues after a warning, or in serious cases without a prior warning, the CEO / Corporate Governance & Strategy Manager may issue a notification letter (see **Appendix D**) formally advising the customer of the restriction being imposed, its duration (not exceeding 12 months), and the process and timing for review.

Where the conduct occurred in person at a Council facility, the Facility Access Restriction Notice at **Appendix G** should be used instead of Appendix D, as it addresses physical access to the facility rather than the method of communication.

9.5 Recording and notifying staff

All decisions made under this policy will be recorded in the Unreasonable Customer Conduct Register (Doc ID #416568), and relevant staff (including reception and customer service staff) will be notified of any restriction so it can be applied consistently.

10. REVIEW AND APPEAL

10.1 Periodic review

Restrictions will be reviewed no later than every 3 to 12 months, depending on the nature of the restriction. The customer will be invited to participate in the review in a manner consistent with their current restriction (for example, in writing, if they are subject to a writing-only restriction).

10.2 Right of appeal

A customer has the right to one appeal of a decision to restrict their access, to be considered by a senior staff member who was not involved in the original decision. The outcome will be provided to the customer in writing, signed by the Chief Executive Officer. If dissatisfied, the customer may seek external review from the SA Ombudsman.

11. NON-COMPLIANCE WITH A RESTRICTION

Staff must record and report any instance where a customer does not comply with a restriction placed on their access. The nominated Manager will determine whether further action, including additional restrictions, is warranted.

12. SUPPORTING STAFF

Council recognises that dealing with demanding, abusive or aggressive customers can be stressful for staff. Following an unreasonable conduct incident, staff will be offered a debrief with their Group Manager and the WHS & Risk Adviser, with trauma counselling available through the Employee Assistance Program (EAP), consistent with the Dealing with Aggressive, Violent or Threatening Customers SOP. Council will support staff affected by unreasonable conduct incidents, including assistance with any workers compensation claim arising from injury caused by aggressive conduct.

All unreasonable conduct incidents must be recorded in Skytrust in accordance with the Dealing with Aggressive, Violent or Threatening Customers SOP (Doc ID #390024). Where South Australia Police have responded to an incident, the police report number must also be added to the Skytrust record.

13. TRAINING

Council will ensure that staff who deal with customers receive training on this policy and on managing unreasonable conduct, including as part of induction, and on a periodic basis thereafter.

14. POLICY REVIEW

The effectiveness of this Policy will be reviewed and evaluated no less than every three (3) years, or earlier if legislative, technological or operational changes require.

15. AVAILABILITY OF THE POLICY

Sections 49(4) and 132(1)(a) of the *Local Government Act SA 1999* entitle a person to inspect (without charge) this Policy at the principal business office of the Council during ordinary business hours.

Under S 49(5) and S 32(1)(b), a person is entitled, on payment of a fee fixed by the Council, to a copy of this Policy.

Section 132(3)(d) requires that the Council should, so far as is reasonably practicable, make this Policy available for inspection on the Internet within a reasonable time after the Policy is available at the principal office of the Council.

APPENDIX A: INDIVIDUAL RIGHTS AND MUTUAL RESPONSIBILITIES

Customers have the right to:

- Raise concerns and express their views in ways that are reasonable, lawful and appropriate.
- A fair and impartial assessment of their concerns.
- Be informed of the actions taken and outcome of their concerns, with reasons.
- Be treated with courtesy and respect.

Staff have the right to:

- Determine how a concern will be handled and finalised.
- Expect honesty and reasonable cooperation from customers.
- Be treated with courtesy and respect.
- A safe and healthy working environment.
- Modify, limit or decline service in response to unacceptable customer behaviour.

Customers are responsible for:

- Clearly identifying their concerns and providing relevant information honestly.
- Cooperating with Council staff assigned to their matter.
- Treating Council staff with courtesy and respect at all times.

Council has a zero-tolerance policy regarding any harm, abuse or threats directed towards its staff. Conduct of this kind may result in Council declining to take further action on a concern, or having further dealings with the customer restricted, and may be referred to South Australia Police.

Council and its staff are responsible for:

- Handling all concerns professionally, fairly and impartially.
- Treating customers with courtesy and respect at all times.
- Providing clear reasons for decisions that affect a customer.
- Giving adequate warning of the consequences of unacceptable behaviour before imposing a restriction, except where urgent action is required for safety reasons.

APPENDIX B: UNREASONABLE (CUSTOMER) CONDUCT INCIDENT REPORT FORM

Complete and submit to your Manager/Team Leader/Supervisor/Work Group Coordinator within one business day of an incident.

Date of incident	
Time of incident	
Staff member(s) reporting	
Customer name and reference / account number (if known)	
Nature of contact (phone / in person / written / email)	
Description of the incident, including any specific language used	
Why this conduct is considered unreasonable (e.g. repeated, escalating, safety risk)	
Action already taken (e.g. verbal warning, call terminated, call recorded)	
Was this incident also logged in Skytrust? (Yes / No, and reference number if known)	
Recommended next step	

Reported by _____

Date _____

Reviewed by _____

Date _____

**APPENDIX C: MANAGER/TEAM LEADER/SUPERVISOR/WORKGROUP COORDINATOR
CHECKLIST BEFORE RESTRICTING ACCESS**

- ☐ Completed incident form received and reviewed.
- ☐ Discussed incident with relevant staff member(s).
- ☐ Reviewed customer's prior history and conduct record.
- ☐ Considered the criteria in section 9.2 (merit, proportionality, personal circumstances, likely effectiveness).
- ☐ Considered options other than restricting access.
- ☐ Warning letter issued and signed by CEO/Corporate Governance & Strategy Manager (if applicable).
- ☐ Notification letter issued and signed by the CEO/Corporate Governance & Strategy Manager (if applicable).
- ☐ Register updated and relevant staff notified.
- ☐ Documentation uploaded into appropriate folder within Records Management System

Completed by _____ **Date** _____

APPENDIX D: SAMPLE WARNING LETTER TEMPLATES

TEMPLATE 1 – WARNING LETTER

[DRAFTING NOTE: To be issued on Council letterhead, addressed to the customer, and sent by email and/or post]

Dear [Customer Salutation & Surname],

RE: FORMAL WARNING REGARDING COMMUNICATIONS WITH COUNCIL STAFF — update if required

I am writing regarding your recent **telephone, in person, or mail/email** interactions with Roxby Council staff.

[DRAFTING NOTE: delete whichever is not relevant]

Council recognises that members of the community may at times be frustrated or dissatisfied when dealing with Council matters. We remain committed to listening to concerns, responding to genuine enquiries and treating all members of our community with courtesy and respect. Equally, Council has a responsibility to provide a safe working environment for its staff.

Under Council's work health and safety obligations, policies and procedures, including Council's Unreasonable Conduct Policy and its Dealing with Aggressive, Violent or Threatening Customers Standard Operating Procedure, Council is required to take reasonable steps to protect its workers from risks to their health and safety. This includes risks arising from aggressive, abusive, threatening or intimidating behaviour by members of the public when interacting with Council employees.

Council takes this responsibility seriously. While Council understands that members of the community may at times be frustrated or dissatisfied, staff must be able to perform their work without being subjected to aggression, abuse, intimidation or personal insults.

On **[date]**, during contact with Council by **[telephone/in person/in writing]**, **[describe the conduct of concern factually and objectively]**

[DRAFTING NOTE: the below is an example only, please update with relevant information for this customer].

- **[Date] – [Example: customer became hostile and argumentative after being provided a routine explanation, made disparaging remarks about a Council service].**

Council considers this conduct unacceptable, and it must stop. This letter serves as a formal warning issued under Council's Unreasonable Conduct Policy: if this behaviour is repeated, or if you behave in any other way that Council staff consider unreasonable, Council will restrict your ability to contact our office by telephone, and require all future communication with Council to be made in writing either by email or post.

To be clear, this letter does not itself impose a restriction, it puts you on notice of what will occur if the behaviour continues. Council welcomes questions, complaints, differing views and scrutiny from members of the community, and understands that people will not always agree with Council decisions or processes. However, disagreement or frustration does not justify aggressive, abusive or personally insulting behaviour towards Council employees.

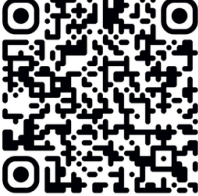
Council also expects that any written correspondence you send will be respectful. Council will not tolerate communications that are abusive, threatening, intimidating or personally derogatory towards its employees. Where behaviour gives rise to concerns for the safety of Council staff, Council may refer the matter to South Australia Police or take other appropriate action.

Council hopes that this warning will not be necessary to act upon, and that our future dealings can continue constructively and respectfully.

PAYMENT OPTIONS

Rates and other Council payments (Roxby Power and Water) can be made using any of the following methods.

***Please note:** Council rates, electricity and water are separate accounts, each with their own reference number — please check the correct notice or statement before making a payment.*

PAYMENT METHOD	DETAILS
 BPAY – Mobile & Internet Banking	Biller Code and Reference Number: Please refer to your current rates notice or utility account notices.
 BPOINT <i>(scan the QR Code to access online payments)</i> 	Online: roxbydowns.sa.gov.au/payments/make-a-payment Reference Number: Please refer to your rates notice or utility account notices
 Cheque / Money Order	Post - Cheque or Money Order Made payable to: Roxby Council PO Box 124, Roxby Downs SA 5725 <i>Please write the Reference Number shown on your rates notice or utility account on the back of the cheque or money order.</i>
 Direct Debit <i>(scan the QR Code to access online payments)</i> 	Download the Direct Debit Request form from Council's website: Rates: Direct Debit Form Roxby Power: Direct Debit Form Complete the form and email it to roxby@roxbycouncil.com.au

If you wish to discuss this letter or have any questions about how to lodge future enquiries in writing, please forward your correspondence to roxby@roxbycouncil.com.au.

Yours sincerely

CEO / Corporate Governance & Strategy Manager – **Delete whichever is not relevant**

TEMPLATE 2 – FIRST AND FINAL LETTER

[DRAFTING NOTE: To be issued on Council letterhead, addressed to the customer, and sent by email and by post. This letter is used where a customer's conduct has continued following a formal warning (refer *Template 1 – Warning Letter above*), or where the CEO/Corporate Governance & Strategy Manager considers the conduct serious enough to warrant immediate restriction without a prior warning.]

Dear [Customer Salutation & Surname],

RE: FORMAL NOTICE REGARDING COMMUNICATIONS WITH COUNCIL STAFF — **update if required**

I am writing regarding your recent **telephone, in person, or mail/email** interactions with Roxby Council staff.

[DRAFTING NOTE: delete whichever is not relevant]

Council recognises that members of the community may at times be frustrated or dissatisfied when dealing with Council matters. We remain committed to listening to concerns, responding to genuine enquiries and treating all members of our community with courtesy and respect. Equally, Council has a responsibility to provide a safe working environment for its staff.

Under Council's work health and safety obligations, policies and procedures, including Council's Unreasonable Conduct Policy and its Dealing with Aggressive, Violent or Threatening Customers Standard Operating Procedure, Council is required to take reasonable steps to protect its workers from risks to their health and safety. This includes risks arising from aggressive, abusive, threatening or intimidating behaviour by members of the public when interacting with Council employees.

Council takes this responsibility seriously. While Council understands that members of the community may at times be frustrated or dissatisfied, staff must be able to perform their work without being subjected to aggression, abuse, intimidation or personal insults.

Unfortunately, there have now been repeated instances where your interactions with Council staff have fallen below the standard of behaviour Council can reasonably accept.

Specific incidents include: **[DRAFTING NOTE: the below are examples only, please update with relevant information for this customer]**

- [Date] – [Example: description of an earlier interaction, e.g. dispute over multiple notices for one property, disparaging remarks about a Council service, continued arguing despite explanation].
- [Date] – [Example: customer became abusive when a request could not be actioned immediately or directly by the staff member who took the call].
- [Date] – [Example: customer used insulting language towards staff, was escalated to a senior officer, and continued the same conduct in follow-up calls].

Council has considered these incidents collectively. Given the repeated nature of this behaviour, Council is required to take reasonable steps to prevent its staff from being subjected to further aggressive or abusive interactions.

Accordingly, in accordance with Council's Unreasonable Conduct Policy, and effective immediately, Council staff will no longer accept **telephone calls, in person contact, or mail/email correspondence** from you **[DRAFTING NOTE: delete whichever is not relevant]**. All future communication with Council must be made in writing, either by email or post.

This decision is not intended to prevent you from raising legitimate concerns, requesting information, making a complaint or accessing Council services. Council will continue to receive, consider and respond appropriately to genuine enquiries from you. The restriction relates specifically to the method of communication, and has been implemented as a measure to protect Council staff and to ensure that future interactions can occur respectfully and with a clear written record.

Council also asks that all written correspondence is respectful. Council will not tolerate communications that are abusive, threatening, intimidating or personally derogatory towards its employees. Any such correspondence will be managed in accordance with Council's relevant policies and procedures. Where behaviour gives rise to concerns for the safety of Council staff, Council may also refer the matter to South Australia Police or take other appropriate action.

To be clear, Council welcomes questions, complaints, differing views and scrutiny from members of the community. We understand that people will not always agree with Council decisions or processes. However, disagreement or frustration does not justify aggressive, abusive or personally insulting behaviour towards Council employees.

Council's responsibility to protect the health and safety of its workers extends to their interactions with members of the public. Council therefore considers this communication restriction to be a reasonable and necessary response to the repeated behaviour outlined above.

Council hopes that this arrangement will allow any future matters you wish to raise to be dealt with constructively and respectfully.

All future correspondence should be directed in writing to:

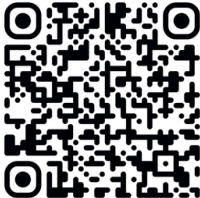
- **Email:** roxby@roxbycouncil.com.au
- **Post:** PO Box 124, Roxby Downs SA 5725

Council staff have been advised of this communication arrangement and will not accept telephone, in person, or mail/email communications from you. **[DRAFTING NOTE: delete whichever is not relevant]**

PAYMENT OPTIONS

Rates and other Council payments (Roxby Power and Water) can be made using any of the following methods.

Please note: Council rates, electricity and water are separate accounts, each with their own reference number — please check the correct notice or statement before making a payment.

PAYMENT METHOD	DETAILS
 BPAY – Mobile & Internet Banking	Biller Code and Reference Number: Please refer to your current rates notice or utility account notices.
 BPOINT <i>(scan the QR Code to access online payments)</i> 	Online: roxbydowns.sa.gov.au/payments/make-a-payment Reference Number: Please refer to your rates notice or utility account notices
 Cheque / Money Order	Post - Cheque or Money Order Made payable to: Roxby Council PO Box 124, Roxby Downs SA 5725 <i>Please write the Reference Number shown on your rates notice or utility account on the back of the cheque or money order.</i>
 Direct Debit <i>(scan the QR Code to access online payments)</i> 	Download the Direct Debit Request form from Council's website: Rates: Direct Debit Form Roxby Power: Direct Debit Form Complete the form and email it to roxby@roxbycouncil.com.au

If you wish to discuss this letter or have any questions about how to lodge future enquiries in writing, please forward your correspondence to roxby@roxbycouncil.com.au.

Yours sincerely

CEO / Corporate Governance & Strategy Manager – Delete whichever is not relevant

APPENDIX E: SAMPLE SCRIPT/PROCEDURE FOR A RESTRICTED CUSTOMER

[DRAFTING NOTE: This is a template 'Customer Service Procedure' that should be issued to relevant staff once a customer has been placed on a communication restriction under this policy (following a Warning Letter or First and Final Letter).

1. Purpose

This procedure provides clear instructions for Customer Service and other Council staff if [Customer Name] telephones Council after being formally advised that all future communication with Council must be in writing.

The purpose of this process is to protect staff from further exposure to aggressive or abusive behaviour and to ensure Council applies the communication restriction consistently.

Staff are not required to manage, negotiate with or attempt to resolve [Customer Name]'s concerns by telephone.

2. If an abusive/aggressive Customer calls Council

Once the caller has been identified as an abusive/aggressive Customer, the staff member should remain polite and calm and advise:

"[Customer Name], Council has advised you in writing that all communication with Council is now required to be in writing. We are therefore unable to continue this telephone call. You can email Council at roxby@roxbycouncil.com.au or write to Council at PO Box 124, Roxby Downs SA 5725. Thank you."

The staff member should then end the call.

3. Do not enter into discussion about the restriction

Staff should not:

- debate or explain why the restriction was imposed
- discuss the incidents that resulted in the restriction
- attempt to resolve their underlying enquiry by telephone
- transfer the call to another Customer Service Officer
- transfer the call to a manager simply because one is requested
- remain on the telephone if the customer argues about the restriction
- respond to abusive, provocative or insulting comments.

If Customer attempts to continue the conversation, the staff member should say:

"Council's position has been provided to you in writing. I am unable to discuss this matter with you by telephone. Please provide any correspondence to Council in writing. I am now ending this call."

The staff member should then end the call. Staff do not need to wait for the Customer to agree before ending the call.

4. If the customer becomes aggressive, abusive or threatening

If [Customer Name] becomes aggressive, abusive, threatening, intimidating or personally insulting at any point, staff should not continue the conversation.

The staff member should say:

"I am ending this call now."

The call should then be terminated immediately. Staff are not expected to provide repeated warnings or remain on the telephone while experiencing abusive or aggressive behaviour.

5. If the customer calls back

If Customer calls again after the initial call has been terminated, staff should repeat only the following:

"[Customer Name], as previously advised, Council will only accept communication from you in writing. I am now ending this call."

End the call. Staff should not engage in further discussion.

6. Repeated calls on the same day

If the Customer repeatedly telephones Council after being advised of the restriction:

- Do not engage in a substantive conversation.
- Advise once that communication must be in writing.
- End the call.
- Record each attempted contact.
- Notify the Customer Service Coordinator or relevant manager.
- If the frequency, content or nature of the calls raises a concern for staff safety, escalate the matter immediately in accordance with Council's Dealing with Aggressive, Violent or Threatening Customers SOP.

7. Recording the contact

Each telephone contact or attempted contact should be documented. The record should include:

- date and time of the call
- name of the staff member receiving the call
- confirmation that the caller was identified as *[Customer Name]*
- whether the communication restriction was explained
- whether the call was terminated
- whether the customer called back
- any aggressive, abusive, threatening or concerning behaviour
- any specific words or threats of concern, recorded as accurately as possible
- whether the matter was escalated and to whom.

Records should be factual and objective. Staff should avoid subjective descriptions where the actual behaviour or words used can be recorded instead.

8. Threats or immediate safety concerns

If *[Customer Name]* makes a threat against a Council employee, another person, Council premises or property, or says anything that causes the staff member to reasonably believe there may be an immediate safety risk:

Do not attempt to manage the situation alone. End the call when it is safe to do so and immediately notify the Customer Service Coordinator and/or relevant manager.

Where there is an immediate threat to the safety of any person, contact 000.

Other threatening or concerning behaviour should be escalated to management for consideration of further action, including referral to South Australia Police where appropriate.

9. If the customer attends Council premises

The telephone restriction does not, by itself, establish how an unexpected physical attendance should be managed.

If Customer attends Council premises and staff have concerns about their behaviour or their own safety, staff should not place themselves in a position of confrontation. The Customer Service Coordinator or relevant manager should be notified immediately and Council's Dealing with Aggressive, Violent or Threatening Customers SOP should be followed.

If there is an immediate threat to any person, contact 000.

10. Support for staff

Any staff member who receives aggressive, abusive or threatening communication should advise their manager.

Where appropriate, the interaction should also be managed through Council's normal WHS incident or hazard reporting process so that repeated behaviour can be monitored and appropriate controls reviewed.

Staff should be reminded that they are not required to tolerate abusive or aggressive behaviour as part of their role.

QUICK REFERENCE FOR CUSTOMER SERVICE STAFF

Customer calls → Identify caller → Advise communication must be in writing → Do not discuss the matter → End call → Record contact → Escalate repeated, aggressive or threatening contact.

THE KEY INSTRUCTION FOR STAFF IS:

Do not debate. Do not transfer. Do not repeatedly explain. Provide the written contact option, end the call and record the interaction.

APPENDIX F: TELEPHONE CONTACT FOR RESTRICTED COMMUNICATIONS



APPENDIX G: SAMPLE FACILITY ACCESS RESTRICTION NOTICE

[DRAFTING NOTE: To be issued under Council letterhead, addressed to the customer, and sent by email and/or post. This letter is used where a customer's conduct at a Council facility (such as Roxby Link) has been aggressive, abusive, threatening or otherwise unreasonable, and Council has determined that a temporary restriction on physical access to the facility is necessary, in accordance with Council's Unreasonable Conduct Policy.]

Dear [Customer Salutation & Surname],

RE: FORMAL NOTICE – RESTRICTION OF ACCESS TO [ROXBY LINK / FACILITY NAME] — [update if required and remove the brackets]

I am writing regarding your recent in-person interactions with Roxby Council staff at [Roxby Link / facility name].

[DRAFTING NOTE: delete whichever is not applicable and remove the brackets]

Council recognises that members of the community may at times be frustrated or dissatisfied when dealing with Council matters. We remain committed to listening to concerns, responding to genuine enquiries and treating all members of our community with courtesy and respect. Equally, Council has a responsibility to provide a safe working environment for its staff.

Under Council's work health and safety obligations, policies and procedures, including Council's Unreasonable Conduct Policy and its Dealing with Aggressive, Violent or Threatening Customers Standard Operating Procedure, Council is required to take reasonable steps to protect its workers from risks to their health and safety. This includes risks arising from aggressive, abusive, threatening or intimidating behaviour by members of the public when interacting with Council employees, including at Council facilities such as [Roxby Link].

Council takes this responsibility seriously. While Council understands that members of the community may at times be frustrated or dissatisfied, staff must be able to perform their work without being subjected to aggression, abuse, intimidation or personal insults.

On [date], during your attendance at [Roxby Link / facility name], [describe the conduct of concern factually and objectively]

[DRAFTING NOTE: Delete whichever is not applicable above, and the below is an example only, please update with relevant information for this customer].

- [Date] – [Example: customer raised their voice, used abusive language towards staff, and refused to leave when asked].

Council considers this conduct unacceptable. As the occupier of [Roxby Link / facility name], Council has the right to determine who may access its premises, and to refuse entry where this is necessary to protect the safety of staff, other patrons, or the orderly operation of the facility.

Accordingly, in accordance with Council's Unreasonable Conduct Policy, you are advised that your access to [Roxby Link / facility name] is restricted, effective immediately, for a period of [insert duration, e.g. three (3) months], from [start date] to [end date].

During this period, you must not enter [Roxby Link / facility name]. If you attend the premises during this period, you may be asked to leave. If you do not do so, Council may treat this as unlawful trespass and may contact South Australia Police.

This restriction relates specifically to physical attendance at [Roxby Link / facility name] **[DRAFTING NOTE: specify here if the restriction extends to other Council facilities, or is limited to this facility only]**. It does not prevent you from raising legitimate concerns, requesting information, or accessing Council services in writing. Council will continue to receive, consider and respond appropriately to genuine enquiries from you made in writing.

[DRAFTING NOTE: if the customer holds an active membership, booking, or program enrolment at the facility, insert details here of how this will be affected, including any refund or suspension arrangements.]

All future correspondence relating to [Roxby Link / facility name] should be directed in writing to:

- **Email:** roxby@roxbycouncil.com.au
- **Post:** PO Box 124, Roxby Downs SA 5725

Staff at [Roxby Link / facility name] have been advised of this restriction.

This restriction will be reviewed on or before [review date], in accordance with Council's Unreasonable Conduct Policy.

If you wish to discuss this letter, please forward your correspondence to roxby@roxbycouncil.com.au.

Yours sincerely

CEO / Corporate Governance & Strategy Manager – [Delete whichever is not relevant]

APPENDIX H: SAMPLE SCRIPT/PROCEDURE FOR ROXBY LINK STAFF — FACE-TO-FACE AGGRESSIVE OR RESTRICTED CUSTOMERS

[DRAFTING NOTE: This is a guide for Roxby Link (or other Council facility) staff. Use it in two situations:

- 1) a customer is being aggressive or abusive right now, or
- 2) a customer who's already been banned from the facility (see Appendix G) shows up during their ban

1. Purpose

This procedure provides clear instructions for Roxby Link staff responding to aggressive, abusive or threatening customer behaviour in person, and for managing a customer who attends the facility after being formally advised in writing that their access is restricted.

The purpose of this process is to protect staff and patrons from exposure to aggressive or abusive behaviour, and to ensure Council applies any facility access restriction consistently.

Staff are not required to manage, negotiate with, or attempt to resolve a customer's concerns while they are behaving aggressively or in breach of a restriction.

2. If a customer becomes aggressive, abusive or threatening

Staff should remain calm and polite, and avoid matching the customer's tone.

Where safe to do so, staff should ask the customer to lower their voice or moderate their behaviour.

If the behaviour continues, the staff member should say:

"I'm not able to continue this conversation while you're speaking to me like this. I need you to leave, or I will need to ask my manager or security for assistance."

Staff should not place themselves between the customer and an exit, and should move towards other staff, a duress alarm, or an open area if they feel unsafe.

3. If the customer has an active access restriction and attends the facility

If the customer has previously been issued a Facility Access Restriction Notice (Appendix G) and attends during their restriction period, staff should say:

"Council has advised you in writing that you're not able to attend this facility at the moment. I need to ask you to leave. If you'd like to raise anything with Council, please do so in writing to roxby@roxbycouncil.com.au or PO Box 124, Roxby Downs SA 5725."

Do not debate, explain, or discuss the reasons for the restriction.

If the customer refuses to leave, do not attempt to physically remove them. Contact your Coordinator or Manager immediately, and consider contacting South Australia Police to request their removal as a trespasser.

4. Do not enter into discussion about the restriction

Staff should not:

- debate or explain why the restriction was imposed
- discuss the incidents that resulted in the restriction
- attempt to resolve the customer's underlying enquiry in person
- remain engaged with the customer if they argue about the restriction
- respond to abusive, provocative or insulting comments.

5. Recording the contact

Each incident or attempted attendance should be documented. The record should include:

- date and time of the incident

- name of the staff member(s) involved
- confirmation of the customer's identity, where known
- whether a restriction was explained or in effect
- whether the customer left the premises, and how
- any aggressive, abusive, threatening or concerning behaviour
- any specific words or threats of concern, recorded as accurately as possible
- whether the matter was escalated, and to whom.

Records should be factual and objective. Staff should avoid subjective descriptions where the actual behaviour or words used can be recorded instead.

6. Threats or immediate safety concerns

If a customer makes a threat against a staff member, another patron, or Council property, or says or does anything that causes a staff member to reasonably believe there is an immediate safety risk:

Do not attempt to manage the situation alone. Activate the duress alarm if available, and move to a safe location.

Where there is an immediate threat to the safety of any person, contact 000.

Other threatening or concerning behaviour should be escalated to management for consideration of further action, including referral to South Australia Police and/or a Facility Access Restriction Notice.

7. Support for staff

Any staff member involved in an aggressive, abusive or threatening incident should advise their manager.

Where appropriate, the interaction should also be managed through Council's normal WHS incident or hazard reporting process so that repeated behaviour can be monitored and appropriate controls reviewed.

Staff should be reminded that they are not required to tolerate abusive or aggressive behaviour as part of their role.

QUICK REFERENCE FOR ROXBY LINK STAFF

Customer becomes aggressive → Stay calm → Ask them to stop / leave → Move to safety if needed → Record the incident → Escalate to your Coordinator/Manager.

Restricted customer attends → Advise restriction in writing stands → Do not debate → Ask them to leave → If they refuse, contact Coordinator/Manager and consider SAPOL → Record the incident.

THE KEY INSTRUCTION FOR STAFF IS:

Do not debate. Do not negotiate. Do not place yourself at risk. Ask them to leave, escalate, and record the interaction.