

Unreasonable Conduct by Customers Policy

Preamble

This policy guides Council's management of unreasonable conduct by customers to minimise the risks inherent in such conduct in a manner which is both reasonable and proportionate. It balances the rights of customers to make complaints with the rights of employees, Councillors and contractors (our people) to safety and respect and the equitable allocation of time and resources to all customers.

Policy objectives

The objective of this policy is to provide our people with a framework within which Bass Coast Shire Council (Council) will manage unreasonable conduct by customers.

We are committed to being accessible and responsive to all customers who approach the Council for assistance with a request for service, request for information or with a complaint.

At the same time the success of our organisation depends on:

- Our ability to do our work and perform our functions in the most effective and efficient ways possible;
- The health, safety, wellbeing and security of our people, and
- Our ability to allocate our resources fairly across all the complaints we receive.

When customers behave unreasonably in their dealings with us, their conduct can significantly affect our success. As a result, we need to take proactive and decisive action to manage any customer conduct that negatively and unreasonably affects us and will support our people to do the same in accordance with this policy.

We will ensure that all statutory requirements have been satisfied and all prior communication with the customer has been conducted in accordance with existing policies prior to the invocation of this policy.

Policy statement

This policy applies to the management of unreasonable conduct by customers, as defined in this policy.

I. Defining Unreasonable Conduct by Customers

I.1. Unreasonable conduct by customers

Most of our customers act reasonably and responsibly in their interactions with us, even when they are experiencing high levels of distress, frustration and anger about their complaint.

However, in a very small number of cases some customers behave in ways that are inappropriate and unacceptable – despite our best efforts to help them. They are aggressive and/or verbally abusive towards our people. They threaten harm and violence, bombard our offices with unnecessary and excessive phone calls and emails, make inappropriate demands on our time and our resources and refuse to accept our decisions and recommendations in relation to their complaints. They may also use social media platforms to damage Council’s reputation and brand. When customers behave in these ways we consider their conduct to be ‘unreasonable’.

Unreasonable conduct by customers (UCC) is any behaviour which, because of its nature or frequency, raises substantial health, safety, wellbeing, resource or equity issues for our organisation, our people, other service users and customers or the customer themselves.

UCC can be divided into five categories of conduct:

Unreasonable persistence	Unreasonable persistence is continued, incessant and unrelenting conduct by a customer that has a disproportionate and unreasonable impact on the Council, our people, services, time and/or resources.
Unreasonable demands	Unreasonable demands are demands (express or implied) that are made by a customer that have a disproportionate and unreasonable impact on our people, services, time and/or resources.
Unreasonable lack of cooperation	Unreasonable lack of cooperation is an unwillingness and/or failure by a customer to provide relevant or organised information in order to cooperate with our organisation, staff, or complaints system and processes that results in a disproportionate and unreasonable use of our services, time and/or resources.
Unreasonable arguments	Unreasonable arguments include any arguments that are not based in reason or logic, that are incomprehensible, false or inflammatory, trivial or incoherent and that disproportionately and unreasonably impact upon our organisation, staff, services, time, and/or resources.
Unreasonable behaviour	Unreasonable behaviour is conduct that is unreasonable in all circumstances – regardless of how stressed, angry or frustrated that a customer is – because it unreasonably compromises the health, safety, wellbeing and security of our people other service users or the customer themselves.

Refer to Appendix A for examples demonstrating unreasonable behaviours.

Council has a zero tolerance policy towards any harm, abuse or threats directed towards our people. Any conduct of this kind will be dealt with under this policy and in accordance with our Occupational Health and Safety Management System policies and procedures.

2. Responding to and Managing Unreasonable Conduct by a Customer

2.1. Changing or restricting a Customer’s access to Council

UCC incidents will generally be managed by limiting or adapting the ways that we interact with and/or deliver services to customers by restricting:

WHO they have contact with	For example, limiting a customer to a sole contact person in our organisation.
WHAT they can raise with us	For example, restricting the subject matter of communications that we will consider and respond to.
WHEN they can have contact	Limiting a customer’s contact with our organisation to, for example, a particular time, day, or length of time, or curbing the frequency of their contact with us.
WHERE they can make contact	For example, limiting the locations where we will conduct face-to-face interviews to secured facilities or areas of the office.
HOW they can make contact	Limiting or modifying the forms of contact that the customer can have with us. This can include modifying or limiting face-to-face interviews, telephone and written communications, prohibiting access to our premises, contact through a representative only, taking no further action or terminating our services altogether.

When using the restrictions provided in this section we recognise that discretion will need to be used to adapt them to suit a customer’s personal circumstances, level of competency, literacy skills, etc. In this regard, we also recognise that more than one strategy may need to be used in individual cases to ensure their appropriateness and efficacy.

Refer to Appendix B for examples of limiting or adapting the ways we interact.

3. Managing Customers Seeking Access to Information

The law provides our customers with a general right of access to information held by the organisation unless there is an overriding public interest consideration against disclosure of the information, and as long as releasing the information is consistent with privacy, copyright and other legislation. Information is provided proactively, and customers may make either an informal request or a formal access application under the Freedom of Information Act.

Information is provided via the informal process directly by our people as part of business operations. All requests for information are assessed and determined in accordance with the legislation. Customers seeking access to information that we hold who demonstrate unreasonable conduct can be managed using the following strategies:

3.1. Who – limiting the customer to a sole contact officer

Where a customer requests the same information from different staff, it may be appropriate to restrict their access to a single staff member (a sole contact officer) who will exclusively manage their request(s) for information. This will ensure they are dealt with consistently, in a timely manner and minimise the chances for misunderstandings.

3.2. What – restricting the subject matter of communications that the organisation will consider

Where customers repeatedly request information regarding a matter that is considered to have already been adequately responded to, we may refuse to respond to further requests. The customer will be advised that future correspondence requesting information that has already been provided will be read and filed without acknowledgement.

4. Alternative Dispute Resolution

4.1. Using alternative dispute resolution strategies to manage conflicts with customers

If we determine that services to a customer cannot be terminated in a particular case or that we bear some responsibility for causing or exacerbating their conduct, we may consider using alternative dispute resolution strategies (ADR) such as mediation and conciliation to resolve the conflict with the customer and attempt to rebuild our relationship with them.

A decision as to whether or not to participate in ADR is made on a case-by-case basis and is considered appropriate in the absence of any previous ADR strategies.

Early engagement with the customer prior to formal intervention under the policy should be attempted where practical.

5. Procedure When Changing a Customer's Access to the Council

5.1. Consulting with relevant people

When determining if a customer's access should be changed we will consult with relevant people on the following:

- The circumstances that gave rise to the UCC/incident(s).
- The impact of the customer's conduct on our organisation, relevant people, our time, resources, etc.
- The customer's responsiveness to the staff member's warnings/requests to stop the behaviour.
- The actions relevant people have taken to manage the customer's conduct, if any.
- The suggestions made by relevant people on ways that the situation could be managed.

5.2. Criteria to be Considered

The following criteria will be considered;

- Whether the conduct in question involved overt anger, aggression, violence or assault (which is unacceptable in all circumstances).
- Whether the customer's case or complaint has merit.
- The likelihood that the customer will modify their unreasonable conduct if they are

given a formal warning about their conduct.

- Whether changing or restricting access to our services will be effective in managing the customer's behaviour.
- Whether changing or restricting access to our services will affect the customer's ability to meet their obligations, such as reporting obligations.
- Whether changing or restricting access to our services will have an undue impact on the customer's welfare, livelihood or dependents etc.
- Whether the customer's personal circumstances have contributed to the behaviour. For example, the customer is a vulnerable person who is under significant stress as a result of one or more of the following:
 - Homelessness
 - Physical disability
 - Illiteracy or other language or communication barrier
 - Mental or other illness
 - Personal crisis
 - Substance or alcohol abuse
- Whether the customer's response/conduct in the circumstances was moderately disproportionate, grossly disproportionate or not at all disproportionate.
- Whether there are any statutory provisions that would limit the types of limitations that can be put on the customer's contact/access to our services.
- Whether we bear some responsibility for causing or exacerbating their conduct.
- Once we have considered these factors a decision will be made on the appropriate course of action.

5.3. Providing a warning letter

Unless a customer's conduct poses a substantial risk to the health, safety and wellbeing of staff or other third parties, they will be provided with a written warning about their conduct in the first instance.

5.4. Providing a notification letter

If a customer's conduct continues, after they have been given a written warning or in extreme cases of overt aggression, violence, assault or other unlawful/unacceptable conduct, the organisation has the discretion to send a notification letter immediately restricting the customer's access to our services (without prior written warning). Where necessary, police will be notified.

5.5. Continued monitoring/oversight responsibilities

Once a customer has been issued with a warning letter or notification letter we will review the customer's record/restriction every 12 months, on request by one of our people, or following any further incidents of UCC that involve the particular customer to ensure that they are complying with the restrictions/the arrangement is working.

If we determine that the restrictions have been ineffective in managing the customer's conduct or are otherwise inappropriate they may decide to either modify the restrictions, impose further restrictions or terminate the customer's access to our services altogether.

6. Reviewing a Decision to Change or Restrict Access to Council

6.1. Right of review

Customers are entitled to one review of a decision to change/restrict their access to our services. This review will be undertaken by a senior officer at Council who was not involved in the original decision to change or restrict the customer's access. This officer will consider the customer's arguments along with all relevant records regarding the customer's past conduct. The customer will be advised of the outcome of their review by letter.

If a customer continues to be dissatisfied after the review process, they should be advised to contact the Victorian Ombudsman at <https://www.ombudsman.vic.gov.au>.

7. Periodic Reviews of all Cases where a Change or Restriction to Access is Applied

7.1. Period for review

All UCC cases where this policy is applied will be reviewed every 12 months after the service change or restriction was initially imposed or continued/upheld.

7.2. Notifying the customer of an upcoming review

We will invite all customers to participate in the review process unless they determine that this invitation is reasonably likely to provoke a negative response from the customer (i.e. further UCC). The invitation will be given and the review will be conducted in accordance with the customer's access restrictions (e.g. if contact has been restricted to writing only then the invitation to participate will be done in writing).

7.3. Criteria to be considered during a review

When conducting a review Council will consider:

- Whether the customer has had any contact with the organisation during the restriction period.
- The customer's conduct during the restriction period.
- Any information/arguments put forward by the customer.
- Any other information that may be relevant in the circumstances.

Sometimes a customer may not have a reason to contact our office during their restriction period. As a result, a review decision that is based primarily on the fact that the customer has not contacted our organisation during their restriction period (apparent compliance with our restriction) may not be an accurate representation of their level of compliance/reformed behaviour. This should be taken into consideration, in relevant situations.

7.4. Notifying a customer of the outcome of a review

We will notify the customer of the outcome of their review using the appropriate/relevant method of communication as well as a written letter explaining the outcome, as applicable.

8. Roles and Responsibilities

To effectively administer the UCC policy, there is a reliance on our people within this process to review and analyse a customer's contact with the organisation. To enable this process our people are responsible for recording all contacts that they have with a customer; regardless of the customer being designated UCC.

To facilitate the recording of customer contacts, our people are to use our enterprise systems i.e. OneCouncil and/or RM8.

8.1. Council employees

Our people are responsible for familiarising themselves with the policy and procedure.

Our people are responsible for speaking with their Managers about how this policy and associated procedure relates to any Business Unit specific procedures regarding managing customer behaviours.

Our people are encouraged to explain the contents of this document to all customers particularly those who engage in UCC or exhibit the early warning signs of UCC.

Where staff identify a customer as exhibiting UCC behaviours, they are to report the incident(s) to their Supervisor. Our people are responsible for recording and reporting all UCC incidents they experience or witness (as appropriate) to their Supervisor within 24 hours of the incident occurring and ensuring details of contacts are recorded. All incidents are to be registered in the OneCouncil My Safety module.

While effective application of this policy relies on all our people identifying and reporting UCC incidents, it must be emphasised that any strategies that effectively change or restrict a customer's access to our services must be considered at the Senior Management level or higher as provided in this procedure.

8.2. The General Manager, Executive Manager and Manager

The Manager, in consultation with relevant people, has the responsibility and authority to provide advice to their Executive Manager or General Manager and the Coordinator Customer and Visitor Experience, on changing or restricting a customer's access to Council in the circumstances identified in this procedure.

The Manager is also required to:

- Ensure that all relevant people are trained to deal with UCC – including on induction.
- Support staff to apply the strategies in the policy and procedure and are responsible for ensuring compliance.
- Record, monitor and review all cases where UCC is applied within their business area to ensure consistency, transparency and accountability for the application of these procedures.
- Manage and keep a record of all cases where these procedures are applied.

Depending on the circumstances, managers may also be responsible for arranging other forms of support for our people.

8.3. UCC Review Panel

The Review Panel is made up of three Managers to monitor and review all cases where these procedures are applied across all business areas to ensure consistency, transparency and accountability.

The Review Panel, in consultation with relevant people, has the responsibility and authority to change or restrict a customer's access to our services in the circumstances identified in the policy. Their aim, when taking such actions will not be to punish the customer, but rather to manage the impacts of their conduct.

When applying the policy, the Review Panel will also aim to keep at least one open line of communication with a customer. However, we do recognise that in extreme situations all forms of contact may need to be restricted for some time to ensure the health, safety, wellbeing and security of our staff and/or third parties.

The Review Panel is also responsible for recording, monitoring and reviewing all cases to ensure consistency, transparency and accountability for the application of the policy and this procedure. They will also manage and keep a file record of all cases where this policy and procedure is applied.

8.4. Manager Governance and Property

The Manager Governance and Property acts as a central point of escalation and will be notified by business unit managers of any proposed changes or restrictions to a customer's access.

The Manager Governance and Property is responsible for ensuring that requests for information that are received by, or referred to, the Corporate Information team by business unit managers are dealt with according to Council procedures and the Freedom of Information Act.

The Manager Governance and Property is also responsible for maintaining currency and accuracy of information held centrally about UCC and changes to customer's access to our services.

8.5. General Managers and Executive Managers

All General Managers and Executive Managers are responsible for supporting our people to apply the strategies in this procedure.

The General Manager Business Transformation is responsible for approving any strategies that effectively change or restrict a customer's access to Council. These include notifying customers of any changes or restrictions to their access to the Council, and any outcomes of a review of changes to access restrictions that have been applied.

8.6. Chief Executive Officer

The CEO will approve any decision to completely terminate a customer's contact / access to the organisation.

8.7. Training and Awareness

We are committed to ensuring that all our people are aware of and know how to implement this policy. All people who deal with customers in the course of their work will also receive appropriate training and information on using this policy and on managing UCC on a regular basis, in particular on induction.

8.8. Ombudsman May Request Copies of Our Records

We will keep records of all cases where this policy is applied, including a record of the total number of cases where it is used every year. This data may be requested by the Ombudsman to conduct an overall audit and review in accordance with its administrative functions and/or to inform its work on UCC.

Additional documents

- Appendix A - Examples of unreasonable conduct by customers
- Appendix B - Limiting or adapting the ways we interact

Reference to other documents

This policy was developed to align with the following;

- Code of Conduct
- Privacy and Data Protection Policy
- Working Together Policy
- Occupational Health and Safety Policy
- Occupational Health and Safety Management System
- Councillor Code of Conduct
- Complaint Handling Policy
- Customer Service Charter
- Local Government Act 2020
- Local Government Act 1989
- Charter of Human Rights and Responsibilities Act 2006
- Protected Disclosure Act 2012
- Privacy and Data Protection Act 2014
- Occupational Health and Safety Act 2004
- Information Privacy Act 2000
- Freedom of Information Act 1982
- The Ombudsman's Guide 'Better Practice Guide to Managing Unreasonable Complainant Conduct', August 2009.
- The Ombudsman's guide 'Managing Unreasonable Conduct Practice Manual', May 2012.

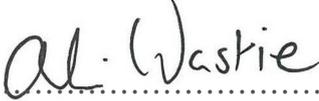
Review process

This policy and associated documents will be reviewed every 2 years.

Accountability process

The General Manager Business Transformation is accountable for the proper application and review of this Policy.

Approval

Approved by Chief Executive Officer  Date 12/5/2021
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Appendix A

Examples of Unreasonable Conduct by Customers (UCC)

Unreasonable persistence

Unreasonable persistence is continued, incessant and unrelenting conduct by a customer that has a disproportionate and unreasonable impact on the Council, our people, services, time and/or resources.

Some examples of unreasonably persistent behaviour include:

- An unwillingness or failure to accept reasonable and logical explanations including final decisions that have been comprehensively considered and dealt with.
- Persistently contacting the organisations about the same matter when it has been comprehensively considered and dealt with.
- Targeting the organisation with multiple requests about a range of issues, whether related or not, which separately or together require an unreasonable or unfair allocation of Council's resources.
- Pursuing and exhausting all available options when it is not warranted and refusing to accept the Council's position when told that further action cannot or will not be taken on their complaints.
- Reframing a complaint in an effort to get it taken up again.
- Bombarding our people with phone calls, visits, letters, and emails (including cc'd correspondence) after repeatedly being asked not to do so.
- Contacting different people within our organisation and/or externally to get a different outcome or more sympathetic response to their complaint – internal and external forum shopping.
- Sending emails to multiple people within the organisation on the same issue/s.

Unreasonable demands

Unreasonable demands are demands (express or implied) that are made by a customer that have a disproportionate and unreasonable impact on our people, services, time and/or resources.

Some examples of unreasonable demands include:

- Issuing instructions and making demands about how we have/should handle their complaint, the priority it was/should be given, or the outcome that was/should be achieved.
- Insisting on talking to a senior manager, General Manager, Mayor, Councillor or the CEO personally when it is not appropriate or warranted.
- Emotional blackmail and manipulation with the intention to guilt trip, intimidate, harass, shame, seduce or portray themselves as being victimised – when this is not the case.
- Insisting on outcomes that are not possible or appropriate in the circumstances – e.g. for someone to be sacked or prosecuted, an apology and/or compensation when there is no reasonable basis for expecting this.
- Demanding services that are of a nature or scale that we cannot provide when this has been explained to them repeatedly.

- Expecting responses to requests which separately or together require an unreasonable or unfair allocation of resources

Unreasonable lack of cooperation

Unreasonable lack of cooperation is an unwillingness and/or failure by a customer to provide relevant or organised information in order to cooperate with our organisation, staff, or complaints system and processes that results in a disproportionate and unreasonable use of our services, time and/or resources.

Some examples of unreasonable lack of cooperation include:

- Sending a constant stream of comprehensive and/or disorganised information without clearly defining any issues of complaint or explaining how they relate to the core issues being complained about – only where the customer is clearly capable of doing this.
- Providing little or no detail with a complaint or presenting information in ‘drips and drabs’.
- Refusing to follow or accept our instructions, suggestions, or advice without a clear or justifiable reason for doing so.
- Arguing frequently and/or with extreme intensity that a particular solution is the correct one in the face of valid contrary arguments and explanations.
- Displaying unhelpful behaviour – such as withholding information, acting dishonestly, misquoting others, and so forth.

Unreasonable arguments

Unreasonable arguments include any arguments that are not based in reason or logic, that are incomprehensible, false or inflammatory or trivial and that disproportionately and unreasonably impact upon our organisation, staff, services, time, and/or resources.

Arguments are unreasonable when they:

- Fail to follow a logical sequence.
- Are not supported by any evidence and/or are based on conspiracy theories.
- Lead a customer to reject all other valid and contrary arguments.
- Are trivial when compared to the amount of time, resources and attention that the customer demands.
- Are false, inflammatory or defamatory.

Unreasonable behaviour

Unreasonable behaviour is conduct that is unreasonable in all circumstances – regardless of how stressed, angry or frustrated that a customer is – because it unreasonably compromises the health, safety, wellbeing and security of our people other service users or the customer themselves.

Some examples of unreasonable behaviours include:

- Acts of aggression, verbal abuse and derogatory, racist, or grossly defamatory remarks.
- Harassment, intimidation or physical violence.

- Rude, confronting and/or threatening face to face or phone contact or correspondence.
- Threats of harm to self or third parties, threats with a weapon or threats to damage property including bomb threats.
- Stalking (in person or online).
- Emotional manipulation.
- Threats to escalate complaints to other officers, Councillors and the media

Appendix B

Limiting or adapting the ways we interact

WHO – limiting the customer to a sole contact point

Where a customer tries to forum shop internally within our organisation, changes their issues of complaint repeatedly, reframes their complaint, or raises an excessive number of complaints, it may be appropriate to restrict their access to a single staff member (a sole contact point) who will exclusively manage their complaint(s) and interactions with our office. This may ensure they are dealt with consistently and may minimise the chances for misunderstandings, contradictions and manipulation.

Customers who are restricted to a sole contact person will be given the email contact details of staffmember@basscoast.vic.gov.au. In the event the person does not have access to email an appointed person will become their primary contact. If the appointed contact is unavailable due to taking leave or is otherwise unavailable for an extended period of time an additional person will be provided as appointed contact.

WHAT – restricting the subject matter of communications that we will consider

Where customers repeatedly send written communications, letters, emails, or online forms that raise trivial or insignificant issues, seek to unfairly diminish Council's reputation, contain inappropriate or abusive content or relate to a complaint/issue that has already been comprehensively considered and/or reviewed (at least once), we may restrict the issues/subject matter the customer can raise with us or that we will respond to. For example, we may:

- Refuse to respond to correspondence that raises an issue that has already been dealt with comprehensively, that raises a trivial issue, or is not supported by clear evidence. (The customer will be advised that future correspondence of this kind will be read and filed without acknowledgement unless we decide that we need to pursue it further in which case, we may do so on our 'own motion').
- Restrict the customer to one complaint/issue per month. (Any attempts to circumvent this restriction, for example by raising multiple complaints/issues in the one complaint letter may result in modifications or further restrictions being placed on their access).
- Return correspondence to the customer and require them to remove any inappropriate content before we will agree to consider its contents. (A copy of the inappropriate correspondence will also be made and kept for our records to identify repeat/further UCC incidents).

WHEN – limiting when and how a customer can contact us

If a customer's telephone, written or face-to-face contact with our organisation places an unreasonable demand on our time or resources because it is overly lengthy (e.g. disorganised and voluminous correspondence), or affects the health, safety, wellbeing and security of our people because it involves behaviour that is persistently rude, threatening, abusive or aggressive, we may limit when and/or how the customer can interact with us. This may include:

- Limiting their telephone calls or face-to-face interviews to a particular time of the day or days of the week.
- Limiting the length or duration of telephone calls, written correspondence or face-to-face interviews.
- Limiting the frequency of their telephone calls, written correspondence or face-to-face interviews.

For irrelevant, overly lengthy, disorganised or frequent written correspondence we may also:

- Require the customer to clearly identify how the information or supporting materials they have sent to us relate to the central issues that we have identified in their complaint.
- Restrict the frequency with which customers can send emails or other written communications to our office.
- Restrict a customer to sending emails to a particular email account (e.g. staffmember@basscoast.vic.gov.au) or block their email access altogether and require that any further correspondence be sent through Australia Post only.

Writing only restrictions

When a customer is restricted to 'writing only' they may be restricted to written communications through:

- Australia Post only.
- Email only to staffmember@basscoast.vic.gov.au
- Some other relevant form of written contact, where applicable.

Any communications that are received by our office in a manner that contravenes a 'write only' restriction will either be returned to the customer or read and filed without acknowledgement.

WHERE – limiting face to face interviews

If a customer is violent or overtly aggressive, unreasonably disruptive, threatening or demanding or makes frequent unannounced visits to our premises, we will consider restricting our face-to-face contact with them.

These restrictions may include:

- Restricting access to particular secured premises or areas of the office – such as the reception area or a secured room/facility.
- Restricting their ability to attend our premises to specified times of the day and/or days of the week only – for example, when additional security is available or to times/days that are less busy.
- Allowing them to attend our office on an 'appointment only' basis and only with specified staff. Note – during these meetings staff should always seek support and assistance of a colleague for added safety and security.
- Banning the customer from attending our premises altogether and allowing some other form of contact – e.g. 'writing only' or 'telephone only' contact.

HOW - contact through a representative only

In cases where we cannot completely restrict our contact with a customer and their conduct is particularly difficult to manage, we may also restrict their contact to go through a support person or representative only. The support person may be nominated by the customer but must be agreed to by us.

Completely terminating a customer's access to Council

In rare cases, and as a last resort when all other strategies have been considered and/or attempted, the CEO may decide that it is necessary for our organisation to completely restrict a customer's contact/access to our services.

- A decision to have no further contact with a customer will only be made if it appears that the customer is unlikely to modify their conduct and/or their conduct poses a significant risk for our people because it involves one or more of the following types of conduct:
- Acts of aggression, verbal and/or physical abuse, threats of harm, harassment, intimidation, stalking, assault.
- Damage to property while on our premises.
- Threats with a weapon or common office items that can be used to harm another person or themselves.
- Physically preventing a staff member from moving around freely either within their office or during an off-site visit – e.g. entrapping them in their home.
- Conduct that is otherwise unlawful.

A customer's access to our services and our premises may also be restricted (directly or indirectly) using the legal mechanisms such as trespass laws/legislation or legal orders to protect members of our staff from personal violence, intimidation or stalking by a customer.