ABERTILLERY AND LLANHILLETH COMMUNITY COUNCIL

COMPLAINTS POLICY

If you have a complaint, you can contact the Council in the following ways:

By telephone: (01495) 217323
By email: clerk@abertilleryandllanhilleth-wcc.gov.uk
By letter: Council Offices, Mitre Street, Abertillery, Blaenau Gwent. NP13 1AE

This complaints procedure is aimed at dealing with those situations where a complaint has been made about the administration of the Council or about its procedures.

Complaints against staff are always dealt with as employment matters ~~and~~

Complaints against Councillors are dealt with by the Public Services Ombudsman.

The aim is to deal with complaints efficiently through a transparent process. The procedure deals with complaints that have not been capable of resolution on a less formal basis, or by explanations from the Clerk or Chair of Council. It gives the complainant the assurance that their grievance has been properly and fully considered.

How we will deal with your complaint:

- We will acknowledge receipt of your complaint within ~~three~~ five working days and investigate your complaint within ~~ten~~ 20 working days. If we cannot meet these deadlines we will inform you of the reasons why.
- Your complaint will be treated as confidential unless it is a matter which must be reported such as illegal activity.
- We will deal with your concern in an open and honest way and ensure that any of your future dealings with the Council do not suffer because you have expressed a concern or made a complaint.
- If you are making a complaint on behalf of someone else we will need to satisfy ourselves that you have the authority to act on behalf of the person concerned.
- If the nature of the complaint has already been dealt with by an external body then the Clerk may decide no further action to be taken and will communicate the decision and reason why to the complaint

Process for making a complaint:

- All formal complaints must be in writing addressed to the Clerk of the Council. This may be in the form of written correspondence either by letter or email.
- The Clerk will respond to your complaint following investigation of the matter concerned within the appropriate timescale.
- If the complaint is against any member of staff~~the Clerk~~, this will be referred to the Human Resources Committee. ~~or~~
- I~~i~~f you are dissatisfied with the response you receive then you may ask for the complaint to be dealt with by the Complaints Committee of the Council, which will comprise of four elected members, to be chosen by the Clerk in consultation with the Chairman of the Council, depending on the nature of the complaint. The complainant will be invited to attend a meeting of the Complaints Committee to present their case and bring such representation as they wish. The decision of the Committee will be confirmed in writing

~~Adopted at Council 26 July 2017~~
Draft Amendments October 2025.

within 7 working days or the Committee meeting and making a decision, together with details of any action taken or recommended. This decision is final.

- All complaints about the conduct of Councillors must be addressed to the Public Services Ombudsman for Wales at 1 Ffordd Yr Hen Gae, Pencoed, CF35 5LJ.

ABERTILLERY AND LLANHILLETH COMMUNITY COUNCIL

RISK MANAGEMENT POLICY

1. **INTRODUCTION**

1.1 The recognition and management of risk is vital to ensure the proper management of the Council's assets and resources and efficient discharge of its duties and responsibilities to the community. Risk assessment is a continuous process which the Council needs to keep under review and ensure continuous monitoring.

1.2 The Practitioner's Guide on Governance and Accountability requires Councils to identify risks which it faces and put in place a scheme designed to create the necessary awareness and actions required to reduce the threat or possibility of an action or event that can impact on the interests of the Council and in turn the community it serves.

1.3 Risk management is not a process which seeks to avoid risk completely but it seeks to identify and assess risks on an individual basis by using a scoring methodology which identifies the severity of risk, the likelihood of it occurring and the impact if the risk was realised. Although each risk will have a different score rating, each of the risks will require an assessment of actions needed to minimise the risk.

1.4 The Plan which is appended to this policy identifies each of the risks that are considered to require attention as the impact of each on the Council would be of concern and in some cases could be extremely serious.

1.5 The Plan forms part of the internal control arrangements of the Council and will be used as part of the process of audit by the Finance and Governance Committee in conjunction with Council's Internal Auditor.

1.6 In most of the identified areas of risk the Council's insurance arrangements will apply such as in relation to public liability, employer liability, loss of money, fidelity guarantee, property damage, official's indemnity and loss or damage to equipment. The Council's insurers do however require the Council to adopt a process of risk management so that the exposure to insured risks are minimised.

1.7 An annual review of the plan in conjunction with the Council's insurance arrangements will be undertaken at the Annual Meeting of the Council.

2. ASSESSMENT CRITERIA

2.1 Rating and Classification of Risks

The rating and classification that is used in the Plan is as follows:

a) **Rating**

Potential Consequence Score: 1-3

Likelihood of Happening Score: 1-3

Severity Level Score: Potential Consequence x Likelihood

b) **Classification**

1-3	Low
4 or 6	Medium
9	High

RISK MANAGEMENT PLAN

Risk Item	Risk Identified	Potential Consequence	Likelihood	Severity Score	Classification	Measures to be taken to reduce, minimise or control risk
Precept	Not submitted by Clerk Inadequacy of the Precept	3 3	1 1	3 3	Low Low	Established budget process in place with the Finance and Governance Committee considering the draft budget through October to December and Council approving the budget and precept in January of each year. Clerk/RFO to notify the County Borough Council of precept in January each Year. Financial Comparison reports to be considered by the Finance and Governance Committee every quarter enabling it to assess income and expenditure against budget headings. Bank reconciliation reports to be presented to the Council on a monthly basis as an additional method of Councillors assessing the state of the Council’s finances.
Rental Fees for Allotments	Rental fees are not received for every tenant in a timely fashion Tenants fail to meet conditions of tenancy agreements	2 2	1 2	2 4	Low Medium	Clerk/RFO to invoice allotment groups in February. Receipts to be issued for all rental fees received and invoices to be marked with the receipt number for the purpose of internal audit checks. Council to carry out once a year inspections

Risk Item	Risk Identified	Potential Consequence	Likelihood	Severity Score	Classification	Measures to be taken to reduce, minimise or control risk
Loss of Money	Non recording of Cash payments	2	1	2	Low	The only cash payments received relate to payments received at events or any other cash from local organisations and attenders who pay a fee to the Council. All such payments to be receipted and where possible accepted by an oficer in the company of a Councillor.
	Loss due to Fraudulent action By employees	3	1	3	Low	All cheques signed by two Councillors against invoices. All expenditure approved by Council or officers with delegated authority and accounts subject to internal audit and Council scrutiny. Bank payments authorised by two of four Councillors.
Investment Income	Loss of income due to type of investment made.	3	1	3	Low	Council's Investment Strategy to be reviewed by the Finance and Governance Committee once a year. Focus on investments to be based on stability and liquidity rather than an over focus on investment gain.
Reserves General	Inability to manage any unforeseen occurrences due to lack of cash flow.	3	1	3	Low	Council policy to maintain a non-earmarked reserve of between 3 and 12 month's annual budgeted sum.
Reserves Earmarked	Lack of availability of funding to meet planned commitments.	2	1	2	Low	Annual budgeting process to designate earmarked funding requirement and allocated sums to be preserved through having an adequate level of general reserves (excluding EMR).

Risk Item	Risk Identified	Potential Consequence	Likelihood	Severity Score	Classification	Measures to be taken to reduce, minimise or control risk
War Memorial Grounds Contract	Failure of contractor to meet the requirements of the contract.	3	1	3	Low	A detailed specification to be drawn up and jointly signed with Contractor. Inspections of Council sites to be undertaken quarterly during the year as well as we as checks to assess the adequacy of the performance of the Contractor and Clerk/RFO to take up matters with the Contractor as appropriate.
Legal Powers	Council acting Beyond its powers e.g. ultra vires	3	1	3	Low	All decisions of the Council to be supported by the legal source of the power that is relevant. Advice of the Clerk/RFO to be available at all times.
Salaries and Wages	Salaries and wages are paid at incorrect rates Income Tax and NI not deducted and/or not paid to HMRC	2 3	1 1	2 3	Low Low	All wages and salary levels to be determined annually as per employment contracts and recorded in the minutes. Internal Auditor requested to check that correct rates being paid. BGCBC to deduct Tax/NI and pay to HMRC by due dates. Finance and Governance Committee to monitor salary and wages payments in accordance with budget.
Recovery of VAT	VAT not recovered from the HMRC	2	1	2	Low	Clerk/RFO to make claim for reimbursement on an annual basis. Finance and Governance Committee to monitor receipt of VAT and Internal Auditor to check claims have been made as appropriate.
Council Debit Card (Lloyds)	Fraudulent use of card	3	2	6	Medium	The Council has a policy in place to control the use of the card. It may only be used by Officers for online purchases. The balance must be paid off in full on a monthly basis by direct debit ensuing that no interest accrues. The maximum credit limit is set at £1000.
Payment of Grants	Appropriate approved grant claims not paid	2	1	2	Low	Officers to be responsible for processing grant payments and the Internal Auditor to check that grant payments have been received.
Councillors Allowances	Allowances not paid In accordance with The IRPW's scheme	2	1	2	Low	Officers to ensure that all claims are appropriately submitted with Councillors being required to complete claim forms supported by receipts as appropriate.

Risk Item	**Risk Identified**	**Potential Consequence**	**Likelihood**	**Severity Score**	**Classification**	**Measures to be taken to reduce, minimise or control risk**
Training of Councillors	Councillors do not have the necessary skills and knowledge to perform their roles.	2	2	4	Medium	Council to have an annual training budget and all Councillors be required to commit themselves to appropriate training. Council has a training plan in place.
Availability of Staff	Main issue concerns Any long term Absence of the Clerk	1	1	1	Low	Three members of staff are employed. In the absence of the Clerk, the Deputies act as Clerk.
Insurance	Insurance is not renewed/in place.	3	1	3	Low	Reminders are sent every year for the policy to be reviewed and renewed.
Failure of IT	IT equipment (i.e. photocopier, laptops) fail.	2	1	2	Low	There is an Ear Marked Reserve budget of £10,000 for office consumables
Subway Mural	Damage to Mural caused by vandalism	3	2	6	Medium	Regular inspections by Clerk/RFO and members and corrective action taken by appointed contractor as appropriate.
Asset Register	Failure to keep up to date could impact insurance and failure to comply with audit requirements.	2	1	2	Low	Register to be reviewed annually and items written off via the Finance and Governance Committee.

Risk Item	Risk Identified	Potential Consequence	Likelihood	Severity Score	Classification	Measures to be taken to reduce, minimise or control risk
ALCC Events	Injury to volunteers And attendees	3	2	6	Medium	Each event has a specific risk assessment plan covering matters such as use of hot water, access to the electricity generator, trailing wires etc.
ALCC Events with over 2000 attendees	Inadequate level of insurance cover in place for events with over 2000 attendees	3	1	3	Low	Take out additional insurance if the need arises.
Christmas Decorations	Connection to Electricity supply Does not comply With appropriate standards	3	2	6	Medium	Qualified electrician employed to connect lights to trees, posts and buildings.
Data Protection	Compliance with Data Protection Act 2018	3	2	6	Medium	Ensure that all aspects of compliance are completed, That Data Protection principles are observed and data Retention policy is implemented (historical data).
Information Security	Important Council Information held In hard copy and On computer is Lost or damaged.	3	2	6	Medium	Important hard copy data is stored in the office. Data held on computer is continually backed up using a cloud service provided by Microshade.
Financial Records	Financial Records Are lost or Damaged.	3	1	3	Low	Financial records are audited annually and files are then held in the office. All transaction data and the cash book are maintained on Rialtas Finance software.

Risk Item	**Risk Identified**	**Potential Consequence**	**Likelihood**	**Severity Score**	**Classification**	**Measures to be taken to reduce, minimise or control risk**
Health and Safety Assessments	Activities of the Council are not Risk assessed and Arrangements Regularly monitored.	3	2	6	Medium	The HR Committee has responsibility for ensuring that risk assessments are prepared and regularly monitored.
Disability Discrimination	Council's facilities Are not compliant With the legislative Requirements.	3	3	9	High	The Council has a staff equality and diversity policy. The building lift is currently out of order and we have no timeline as to when it will be repaired.
Code of Conduct	Members do not Declare interests as Required.	3	3	9	High	Members to be trained in the Code of Conduct. all declarations to be completed using a designated pro-forma and the declaration of interests is to be published on the Council's website.
Welsh Language Act	The Council fails To comply with the Act.	3	3	9	High	Council has not adopted a Welsh Language Policy. Council needs to expand its communication arrangements through the medium of Welsh.
Legal Claims	Claims are made in Relation to Employment matters And from members Of the public about The condition of Council amenities Resulting in injury.	3	1	3	Low	Council models it's as a good employer and follows all expected standards of good employment practice. members are trained in this area. Public liability and legal expenses insurance is in place. The Council has a range of employment policies in place (e.g. grievance and disciplinary procedures).

Dated: October 2025
Approved by Council:
Date for Review:

ABERTILLERY AND LLANHILLETH COMMUNITY COUNCIL

Grants and Funding Policy

1 Introduction

Abertillery and Llanhilleth Community Council pays out a large amount in discretionary grant funding across a wide variety of organisations and for multiple reasons. This policy is to ensure that the Council has oversight of the processes involved and also how this money is accounted for and reported so that the members of the public are aware of what public funds are being used for.

There is also a tightening of the fiscal governance of the Council, we now have a total turnover approaching half a million pounds per year so we need the proper controls and process in place to support that.

For the 2025/2026 financial year the Council has budgeted for £56,000 (12% of the overall budget) for grant payments. This does not include £120,000 paid in annual grants to Off the Street and BGCBC for 6 detached youth workers. So it is vital that Council is transparent about how this money is spent and ensures there is proper governance around the processes in place.

2 Solar Farm Grants

In addition to the grants that Council give out directly, it also administers an annual grant of £35,000 per annum (this annual amount has been set since 2017) paid as a Community Grant from the Solar Farm Company .

There is a set of criteria and organisations can only apply using the correct Solar Farm grant application form. The Councils administration process has evolved over the years. It agrees a time table for applications to be received, a basic check by the officers that all the required information is there, then a meeting of Council to decided the grant recipients.

The decision is then taken to the Solar Farm Community Fund Company to get their agreement and transfer the funds to the Council who in turn pay the grants to the organisations. What may be lacking is a formal process of checking the results of spending and reporting back to Council.

Recommendation 1: That a specific form is created for Council to document any checks on how the grant money is spent, this could also be used to check on the use of other Council grant funding.

Recommendation 2: During the 12 months following a Solar Farm Grant payment three-monthly checks are made on progress and are reported back to the Finance and Governance committee in the first instance, to then make any recommendations back to Council.

Recommendation 3: The Finance and Governance Committee to review the criteria for the Solar Farm Grants and make any recommendations for changes to Council.

3 Council Grants and Ward Grants

The Council currently has two types of discretionary grants processes (not annual grants or project funding)

The Council agrees a budget pot for Council Grants at the January budget meeting, for 2025/26 this is £17,000. Organisations can apply using an official Council Grants application form. There is a limit of £1,000 per application unless "exceptional circumstances" prevail.

Recommendation 4: The Finance and Governance Committee to look at if a definition of exceptional circumstances can be created.

The Council Grants are discussed and decided upon as part of a regular Council Meeting, where the remaining balance of the current years pot is also reported by the Officers.

Recommendation 5: The process for Council Grants should remain the same.

Ward Grants are an historical legacy. It has been set at £200 per ward seat for over 10 years. (Council has 19 seats so that is 19* £200 = £3,800). It used to be that Councillors would apply for their individual £200 to be given to organisations that they nominated but this is unlawful under the local Government Act 1972 where individual Councillors cannot make financial decisions. A compromise was agreed a few years ago where the Ward Grants were taken before the then Finance and Grants Committee to basically rubber stamp the Ward Grant individual Councillor nominations.

This was superseded by a new process in 2024/25, where the Wards were grouped together and a formal Ward Committee meeting(s) were held to agree the allocation of that wards funding. This is the current system in place. It is still cumbersome to administer, and there is a lack of governance and checks on the funding.

Recommendation 6: The Finance and Governance Committee to review if Ward Grants should be merged into the general Council Grants process, so Council then only has a single Council Grants process and no longer has separate Ward Grants.

4 Annual Grants

The Council has a number of Annual Grants that it pays out to organisations across its area. The Grant amounts are agreed when the Council sets its budget in January. The current list in 2025/26 is

- Ffrindiau Tyleri: £10,000 to help put on events
- Llanhilleth Tenants and Residents: £3,000 for Christmas lighting
- Brynithel Community Centre: £1,500 for Christmas lighting
- Swffryd Community Centre: £1,500 for Christmas lighting
- Bournville Community Centre: £1,500 for Christmas lighting
- Aberbeeg Tenants and Residents: £1,500 for Christmas lighting
- Pentre Tyleri: £1,500 for Christmas lighting

- Friends of Roseheyworth: £1,500 for Christmas lighting
- Zion Miners Chapel: £2,000 for social events
- Six Park Tennis Club: £1,740 for toilet running costs
- Abertillery Rock and Blues: £2,000 towards the running costs for the event
- Aber Rocks: £2,000 towards the running costs for the event.

The relevant Committees or Council release the money which allow Officers to pay the organisations. From 2025/26 the Council will no longer pay a block grant amount to an organisation, it requires the organisations to send in invoices which the Council will pay direct. This gives Council and increased level of transparency and governance and what it is actual spending money on.

Recommendation 7: The Finance and Governance Committee to review if any formal checks on the results of funding should be carried out.

Recommendation: 8: That all events be placed under the Leisure and Tourism Committee

5 Projects/Events

The Council runs or supports a number of different annual projects/events through its various Committees. Budgets for these projects are agreed in the January budget meeting.

Leisure and Tourism: Party in the Park, Central Christmas Lighting Contract, War Memorial Maintenance, Chairs Charity Concerts, Llanhilleth Summer Fete, Viaduct Run, Loneliness Project, Summer Cinema.

PlaCE: Town in Bloom, Car Scheme subsidy, Wales in Bloom, Defibrillators, Wales in Bloom.

Community Empowerment: Funding for detached youth workers, Website, Extra-curricular transport for schools, Councillor surgeries.

Recommendation 9: That the funding governance remans within the Committee structure, but as part of the budgeting process for subsequent years the Committee report back on the previous year's spending.

Abertillery and Llanhilleth Community Council

Health and Safety Policy

General

Abertillery and Llanhilleth Community Council is committed to providing a safe working environment for its staff, and the health and safety of staff is a priority for the Council.

The Council employs three officers who are based in offices at the Council Offices, Mitre Street, Abertillery. The officers are the only occupants of the building. Blaenau Gwent County Borough Council use the building for storage, so some staff have access.

The employer has a general duty under section 2(1) of the Health and Safety Act 1974 to "ensure so far as reasonably practicable the health, safety and welfare at work of employees". Further "The Management of Health and Safety at Work Regulations 1999" requires that all work activities are risk assessed.

Section 7 of the Health and Safety Act 1974 also states that "it is the responsibility of employees to take reasonable care of their own health and safety at work."

Fire Arrangements

Fire assessments, PAT testing and building maintenance are undertaken by Blaenau Gwent County Borough Council. Weekly fire alarm and emergency lighting tests are also performed by the officers.

At least one officer must be in attendance during Council meetings held in the offices, to fulfil the duties of Fire Officers.

All officers are aware of the General Emergency Evacuation Plan and meeting point, which is outside of The Metropole Theatre, Abertillery.

Personal Emergency Evacuation Plans will be conducted for staff if needed, such as where there are accessibility concerns.

All three members of staff are Evac-Chair trained.

Working Arrangements

The current working patterns of the officers are as follows:

- Two Deputy Clerks, each working 30 hours per week at the office.
- One Clerk, working 30 hours per week at the office.

Instances of lone working are rare and are typically for singular days rather than long periods.

Officers may occasionally work from home as needed.

One of the Deputy Clerks and the Clerk have Emergency First Aid at Work certification, and a New First Aid kit has been purchased and is in the Clerk's Office.

The three officers have also been trained on the use of the EVAC chair

Risks:

An ergonomics risk assessment has been conducted for all staff and mitigating actions taken.

The Human Resources Committee receives an annual Health and Safety at Work report, and takes appropriate action based on this to ensure the health and safety of the Council's employees.

The Human Resources Committee conducts an annual review of staff health and safety arrangements.

An ergonomic assessment will be undertaken by each member of staff annually, and actions may be taken to make improvements to the office if needed.

Abertillery and Llanhilleth Community Council has an eye testing policy in place to support the optical health of its staff.

Adopted by Council:

Date for Review:

ABERTILLERY AND LLANHILLETH COMMUNITY COUNCIL

POLICY FOR DEALING WITH UNREASONABLY PERSISTENT ~~CUSTOMERS AND~~ COMPLAINANTS AND UNREASONABLE COMPLAINANT BEHAVIOUR

1. Introduction

1.1. This policy identifies situations where a ~~customer or~~ complainant, either individually or as part of a group, might as a result of his/her actions be considered to be unreasonably persistent, habitual, vexatious or otherwise unreasonable and ways of responding to these situations.

~~1.1.~~1.2. In this policy the term habitual means done repeatedly or as a habit, The term vexatious is recognised in law and means denoting an action or the bringer of an action that is brought without sufficient grounds for winning, purely to cause annoyance

~~1.2.~~1.3. The policy intends to assist in identifying cases where people appear to be seeking to be disruptive to the Council through pursuing an unreasonable course of conduct.

~~1.3.~~1.4. The term "complaint" in this policy includes requests made under the Freedom of Information Act (FOIA) 2000 and the Data Protection Acts~~ (DPA) 1998~~. It also includes any other requests or forms of contact, whether received verbally, by letter, by email or by any other means. The term "complainant" in this policy refers to anyone making a complaint or any other form of request.

~~1.4.~~1.5. Habitual, vexatious and unreasonably persistent complaints and unreasonable behaviour by complainants are time consuming and wasteful of resources. Under this policy, restrictions can be placed on unreasonably persistent or unreasonably behaved complainants where there is evidence to justify them.

2. Habitual or Vexatious or Unreasonably Persistent Complainants

2.1. For the purposes of this policy the following definition of habitual or vexatious or unreasonably persistent complaints and complainants will be used:

The repeated and/or obsessive pursuit of:

a. unreasonable complaints and/or unrealistic outcomes; and/or
b. reasonable complaints in an unreasonable manner.

2.2 Where complaints or requests continue over a protracted period or they or the complainant is persistently unreasonable, in accordance with the criteria set out in Section 3, the Clerk will consult with the members of the Human Resources Committee and seek agreement to treat the complaint or complainant as a habitual, vexatious or unreasonably persistent complaint or complainant under this policy. The Clerk in consultation with the members of the Human Resources Committee will decide on the appropriate course of action to be taken. The Clerk may also consult other relevant councillors (including but not limited to the Chairman or Vice-Chairman of the Council and/or members of a relevant committee and/or members of ~~the~~ a Complaints Committee, if that Committee has previously dealt with a relevant complaint or complainant).

2.3 Section 4 details the options for dealing with habitual or vexatious compliants.

~~2.2~~2.4 The Clerk on behalf of Council will notify complainants, in writing, of the reason why their complaint has been treated as habitually or vexatious and the actions that is being undertaken.

3. Definitions

3.1 Abertillery and Llanhilleth Community Council defines unreasonably persistent and vexatious complainants as those complainants who, because of the frequency or nature of their contacts with the Council, hinder the Council's consideration of their or other people's complaints or requests, or the Council's consideration of other matters. The descriptions 'unreasonably persistent' and 'vexatious' may apply to an individual complaint or request or the number of complaints or requests that an individual has made.

3.2 Where there is evidence of people working together (e.g. emails copied in to each other or similar content or patterns of contact), a group of individuals may also be considered to be unreasonably persistent or vexatious.

3.3 Features of an unreasonably persistent and/or vexatious complainant include the following (the list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category).

An unreasonably persistent and/or vexatious complainant may:

- Have insufficient or no grounds for their complaint or request and may appear to be making the complaint or request only to annoy, disrupt or frustrate (or for reasons that they do not make obvious or admit)~~.~~
- Refuse to co-operate with the Council's formal complaints process whilst still wishing their complaint to be resolved.
- Make what appears to be groundless complaints about the staff dealing with the complaint and seeking to have them dismissed or replaced
- Insist on the complaint being dealt with in ways which are incompatible with the complaints procedure.
- Refuse to accept that issues are not within the remit of the complaints policy and procedure.
- Refuse to accept that issues are not within the power of the Community Council to investigate, change or influence.
- Make an unreasonable number of contacts with the Council, by any means in relation to a specific request or complaint(s).
- Make persistent and unreasonable demands of staff and/or the complaints procedure after the unreasonableness has been explained to the complainant.
- Harass or verbally abuse or otherwise seek to intimidate staff dealing with their request or complaint.
- Use foul, inappropriate, offensive, defamatory or racist language.
- Publishing their complaint in other forms of media.

- Raise subsidiary or new issues whilst a request or complaint is being addressed, which were not part of the request or complaint when it was originally made.
- Refuse to accept the reply given or the outcome of the complaints process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.
- Make the same requests or complaints repeatedly, perhaps with minor differences, after the requests or complaints have been concluded and insist that the minor differences make these 'new' requests or complaints which should be dealt with again or through the full complaints procedure.
- Persistently approach the Council through different routes about the same issue.
- Complain about an issue based on an historic and/or irreversible decision or incident.
- Deny statements that they have made at an earlier stage of the complaint process.
- Are known to have electronically recorded meetings and conversations without the prior knowledge and consent of other person involved.
- Adopts a scattergun approach by pursuing a complaint not only with the Council but with external bodies

4. Imposing restrictions

4.1. In the first instance the Clerk will consult with the Chair and Vice Chair of the Council prior to issuing a warning to the complainant, that will explain why the behaviors are causing concern and asking them to change their behavior.

~~4.1.~~4.2. The precise nature of the action that the Community Council takes should be appropriate and proportionate to the nature and frequency of the complainant's contacts with the authority. The action will be decided by the Clerk in consultation with the members of the Human Resources Committee and other members whom the Clerk considers appropriate and may include (this list is not exhaustive):

- limiting the complainant to one medium of contact (e.g. by letter only)
- limiting the complainant to one point of contact only (e.g. a named member of staff)
- limiting the complainant to contact only at certain times of the day
- refusing to register any further complaints or requests regarding the same matter
- refusing to deal with any further requests on the same matter or
- informing the complainant that the Community Council will not reply to or acknowledge any further contact with them on specific topics.

~~4.2.~~4.3. The Clerk on behalf of the Council will notify the complainant in writing of the reasons why their complaint/s or requests have been treated as habitual, vexatious or unreasonably persistent and the action that will be taken. The Clerk will explain that the complainant may appeal the decision through the Council’s complaints process, except where the complaints process has already been exhausted.

~~4.3.~~4.4. Where a complainant continues to behave in a way that is unacceptable the Clerk, in consultation with the members of the Human Resources Committee and other members whom the Clerk considers appropriate may refuse all future contact with the complainant and stop any investigations into ~~his/her~~their behaviour. This may be for a specified period of time (e.g. six months).

~~4.4.~~4.5. Where the behaviour is so extreme or it threatens the immediate safety of staff, other options will be considered, e.g. reporting the matter to the Police.

4.6. A review of a decision to restrict a complainant's contact or the Council's response to them should be undertaken every 6 months, in light of the circumstances prevailing during that 6 months. The review will be conducted by the original decision maker(s) (i.e. the Clerk in consultation with the members of the Human Resources Committee and any other members consulted on the matter or by the Complaints Committee if it has previously considered a complaint on the matter).

4.7. Where a complainant continues to behave in a way that is still unacceptable, the Clerk, in consultation with the Chairman may decide to refuse all contact with the complainant.

4.8. Where the behaviour is so extreme or it threatens the safety, welfare or wellbeing of staff other options may be considered. In such cases the complainant may not be given prior warning of that action.

4.9. The results of any action under this policy will be reviewed every three months that the action is in place by the Clerk in conjunction with the Chair and Vice-Chair of Council and any recommendations taken back to the appropriate Committee or Full Council

4.10. The Clerk will retain adequate records of the details of the case and the action that has been taken.

~~4.5.~~4.11. A report will be made to the next Full Council meeting of any actions and decisions that have been made under this policy.