

SALT TRAINING LIMITED
SALT COLLEGE

Unreasonable, Persistent and Vexatious Behaviour Policy for Parents, Carers and Other Third Parties

Board-ready policy framework

Policy owner	Principal / Chief Executive Officer
Applies to	Salt Training Limited and Salt College
Approval body	Board / Governing Body
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Core principle

Salt welcomes legitimate challenge, scrutiny and complaints. It does not accept abuse, intimidation, harassment, threats or conduct that unreasonably interferes with the safe and effective delivery of education, support and business operations.

1. Policy statement

Salt Training Limited and Salt College are committed to working constructively, respectfully and transparently with parents, carers and other third parties. We recognise that people may at times be worried, frustrated, distressed or dissatisfied with decisions or services. Legitimate concerns and complaints will be listened to and considered fairly under the appropriate procedure.

Salt also has a responsibility to provide a safe working and learning environment and to protect learners, employees, contractors and visitors from behaviour that is abusive, threatening, intimidating, harassing, discriminatory, excessively persistent, disruptive or otherwise unreasonable. Staff are not expected to tolerate unacceptable behaviour as part of their work.

This policy provides a fair, evidence-based and proportionate framework for managing such behaviour, including restrictions on contact or site access where reasonably necessary. It focuses on behaviour and its impact rather than placing a permanent label on an individual.

2. Purpose

The purpose of this policy is to:

- protect employees, learners, contractors and visitors from abuse, harassment, threats and intimidation;
- protect staff wellbeing and maintain a safe working and learning environment;
- ensure legitimate concerns, complaints, safeguarding matters and statutory rights continue to be handled appropriately;
- prevent unreasonable or disproportionate demands from disrupting education, learner support or business operations;
- establish clear expectations for communication and conduct;
- provide a consistent process for warnings, contact restrictions and site restrictions;
- ensure decisions are authorised, recorded, proportionate and subject to review.

3. Scope

This policy applies to parents, carers, family members, advocates, representatives, former or prospective parents/carers, members of the public and other third parties interacting with Salt. It applies to conduct on or off Salt premises where there is a connection with Salt, its staff, learners or services, including telephone, email, correspondence, meetings, digital platforms, messaging services, social media, educational visits and events.

4. Guiding principles

- Legitimate disagreement, challenge or criticism is not in itself unreasonable or vexatious.
- The merits of a complaint and the complainant's behaviour are separate matters.
- Restrictions will be based on evidence, risk, impact and proportionality, not simply because an individual is persistent or disagrees with Salt.
- New and materially different concerns will be considered on their merits.
- Safeguarding information will always be identified and acted on through the appropriate safeguarding arrangements.
- Where appropriate, reasonable adjustments will be considered before or alongside restrictions.
- Salt may act immediately where there is a serious risk to safety, welfare, property or operational security.

5. What may constitute unreasonable, persistent or vexatious behaviour

Behaviour may fall within this policy where its nature, frequency, scale, tone, impact or continuation places unreasonable demands on Salt, adversely affects staff or learners, disrupts services, or creates a safety or wellbeing risk. A single incident may be sufficient where it is serious.

5.1 Communication and contact

- excessive, repetitive or disproportionate emails, calls, messages or correspondence;
- contacting numerous employees repeatedly about substantially the same matter;
- demanding immediate or unreasonable response times;
- repeatedly contacting staff through personal or inappropriate channels;
- continuing to seek substantive responses on issues that have completed the applicable process, without materially new information;
- sending large volumes of repetitive, irrelevant or unnecessarily complex material that creates a disproportionate burden.

5.2 Conduct towards people

- shouting, swearing, insults, personal attacks or derogatory remarks;
- discriminatory, abusive, aggressive, intimidating or harassing behaviour;
- threats of violence, threats to attend premises for confrontation, or conduct causing a reasonable fear for safety;
- targeting individual employees repeatedly or seeking to intimidate staff into changing professional decisions;
- contacting, pursuing or confronting staff or learners in a manner that creates a safety, safeguarding or wellbeing concern.

5.3 Complaint-related conduct

- repeatedly changing the substance of a complaint or refusing to identify the outcome sought despite reasonable assistance;
- refusing reasonably to cooperate with the relevant complaints process while demanding that Salt reach a particular outcome;
- repeatedly submitting substantially the same complaint following completion of the relevant process without materially new evidence;
- making repeated complaints about staff solely because they are administering the agreed process, without reasonable grounds;
- pursuing matters outside Salt's responsibility after this has been clearly explained;
- knowingly providing materially false information, fabricating evidence or knowingly misrepresenting material facts.

6. Conduct that will not, by itself, trigger this policy

- making a complaint or escalating it through an available procedure;
- disagreeing with Salt or challenging a decision;
- asking reasonable questions or requesting explanations;
- raising safeguarding or whistleblowing concerns in good faith;
- exercising SEND, EHCP, mediation, tribunal, legal, regulatory or other statutory rights;

- expressing lawful criticism, including criticism that Salt considers robust or uncomfortable.

7. Threatening, abusive or aggressive behaviour

Salt operates zero tolerance of violence, threats of violence, serious intimidation, abuse and harassment towards employees, learners, contractors and visitors. This does not mean that every difficult interaction will result in formal restriction. The response will reflect seriousness, context and risk.

Where behaviour becomes abusive, threatening or unsafe, staff may end a telephone call or meeting, require a person to leave, seek management or security support, contact emergency services or police where appropriate, initiate safeguarding action, preserve relevant evidence, or impose interim restrictions. Salt does not have to complete informal stages before taking immediate protective action where the circumstances justify it.

8. Telephone, meeting and communication arrangements

Staff may end a call where abusive, threatening, discriminatory or persistently aggressive behaviour occurs. Where practicable, the caller should be told that the behaviour is unacceptable and that the call will end if it continues. A sufficiently serious incident may justify ending the call immediately.

Salt may place proportionate conditions on future engagement, including appointment-only meetings, written questions in advance, defined agendas, reasonable meeting durations, additional staff attendance, remote meetings, or a requirement to communicate through a specified channel.

9. Recordings

Where a person wishes to record a formal meeting, they should normally raise this in advance so that confidentiality, safeguarding, data protection and practical arrangements can be considered. Salt will not automatically treat recording as vexatious behaviour. However, covert recording or the inappropriate use, editing, publication or distribution of a recording may be relevant when assessing conduct, risk or confidentiality.

10. Social media and online conduct

Salt respects lawful freedom of expression and does not seek to prevent legitimate criticism. Appropriate action may nevertheless be taken where online activity involves threats, harassment, discriminatory abuse, serious targeting of individual staff or learners, disclosure of confidential or safeguarding information, impersonation, or activity creating a reasonable safety or safeguarding concern. Matters may be reported to the relevant platform, police, safeguarding authority or other appropriate body where justified.

11. Safeguarding and learner welfare

Nothing in this policy prevents or discourages a genuine safeguarding disclosure. Any information suggesting that a child, young person or adult at risk may be unsafe will be routed through Salt's safeguarding arrangements irrespective of the sender's communication restrictions or previous behaviour.

Where correspondence contains both repetitive or unreasonable content and new safeguarding information, the safeguarding information must still be identified, recorded and escalated appropriately.

12. SEND, EHCP and statutory rights

Nothing in this policy removes or limits rights connected with SEND, Education, Health and Care Plans, annual reviews, consultations, local authority decision-making, mediation, tribunal proceedings, safeguarding, statutory complaints, regulatory processes or legal proceedings.

Where contact restrictions are in place, Salt will maintain an appropriate route for necessary educational, safeguarding and statutory communication, subject to any lawful restrictions or safety measures.

13. Single Point of Contact (SPOC)

Where appropriate, Salt may nominate a Single Point of Contact. The individual may be required to direct relevant communication to the named person or designated organisational address. Other staff may forward correspondence to the SPOC rather than responding separately. A SPOC arrangement does not prevent genuine new concerns from being considered.

14. Contact restrictions

Where justified, Salt may restrict who an individual contacts, the communication channel used, the frequency with which correspondence is substantively reviewed, telephone contact, attendance at meetings, or the staff involved in responding. Duplicate correspondence or matters already concluded may be logged without a further substantive response unless materially new information is provided.

Restrictions must be clear, proportionate, operationally workable and must preserve an appropriate route for essential communication.

15. Access to Salt premises

Salt premises are workplaces and learning environments. Where reasonably necessary to protect safety, welfare or effective operations, Salt may require prior appointments, reception sign-in, accompaniment, meetings in specified locations, remote rather than in-person contact, non-contact with specified persons, or departure from site when reasonably directed.

In serious or repeated cases, permission to enter some or all Salt premises may be restricted or withdrawn, subject to applicable legal requirements and provision of an appropriate alternative route for essential business. The scope, reason, start date and review arrangements should be recorded in writing wherever practicable.

16. Immediate interim restrictions

An immediate interim restriction may be imposed without prior warning where reasonably necessary in response to violence, credible threats, serious intimidation or harassment, serious safeguarding concerns, threatened confrontational attendance, significant risk to staff or learners, serious disruption, or comparable urgent circumstances. The incident, evidence considered, decision-maker and rationale must be recorded and the restriction reviewed as soon as reasonably practicable.

17. Procedure for managing concerns

17.1 Stage 1: Identify and record

Relevant behaviour, impact, evidence, previous steps and any immediate risks should be recorded factually. Staff should avoid emotive or pejorative descriptions.

17.2 Stage 2: Informal expectation or warning

Where appropriate, the individual should be told what behaviour is causing concern, the standard expected and the possible consequences if it continues. This stage can be omitted where the behaviour is sufficiently serious.

17.3 Stage 3: Formal warning

Where concerns continue or warrant a formal response, an authorised senior leader may issue a written warning identifying the behaviour, required changes and potential restrictions.

17.4 Stage 4: Formal restriction

The Principal, Chief Executive Officer or delegated senior leader may impose proportionate restrictions. Written notification should normally state the behaviour relied upon, restriction imposed, effective date, permitted route for essential communication, expected standards, and review arrangements.

17.5 Stage 5: Review

Restrictions will be reviewed to determine whether they remain necessary and proportionate. They may be maintained, varied or removed. Serious new incidents may result in earlier review or escalation.

18. Repeated or duplicate complaints

When the applicable complaints process has been completed, Salt may decline to continue substantive correspondence about substantially the same issue where no materially new issue or evidence has been provided. New complaints or materially new evidence will be assessed on their own merits. This provision must not be used to avoid legitimate scrutiny or a required statutory process.

19. Malicious or knowingly false allegations

An allegation is not malicious merely because it is disputed, unsubstantiated or not upheld. However, evidence that a person has knowingly fabricated material information, deliberately submitted false evidence, or repeatedly used knowingly false allegations to harass or intimidate may be considered under this policy and, where appropriate, referred to another relevant process or authority. Legitimate safeguarding, whistleblowing and regulatory referrals remain protected routes.

20. Equality, accessibility and reasonable adjustments

Salt will consider whether disability, communication needs or other relevant circumstances require reasonable adjustments to the way engagement is managed. Adjustments may include accessible formats, additional time, use of an advocate or an alternative communication route. Consideration of adjustments does not require staff or learners to tolerate violence, threats, harassment or abuse.

21. Representatives and advocates

Where appropriate, Salt may agree that communication takes place through an authorised representative, advocate or professional. Representatives are expected to engage reasonably. Restrictions may be applied to a representative's conduct where justified, without automatically restricting the represented person's legitimate rights.

22. Staff protection and support

- serious incidents should be reported promptly to an appropriate manager;
- immediate safety and safeguarding risks should be considered;
- staff should retain relevant evidence and make factual records;
- direct contact may be transferred to a senior leader or SPOC;
- appropriate wellbeing, HR, safeguarding or management support should be made available;
- staff should not be required unnecessarily to continue direct engagement with a person whose behaviour presents an identified risk.

23. Police, legal advice and external agencies

Salt may contact the police, emergency services, safeguarding partners, legal advisers, insurers, regulators or another appropriate authority where circumstances justify doing so. This may include violence, threats, harassment, stalking, criminal damage, safeguarding concerns or an immediate risk to a person. Decisions will be made according to the circumstances and applicable legal obligations.

24. Evidence, record keeping and data protection

Salt will maintain proportionate records supporting decisions made under this policy. These may include correspondence, call notes, incident reports, witness accounts, meeting records, CCTV where lawfully available, warnings, restriction notices and relevant external reference information.

Personal information will be handled in accordance with applicable data protection law, privacy arrangements, retention requirements and Salt policies. Access to records should be limited to those with an appropriate business, safeguarding or legal need.

25. Confidentiality

Information about behaviour and restrictions will be shared on a need-to-know basis. Relevant staff may need to know about identified risks or restrictions so they can be implemented safely and consistently. Information should not be shared more widely than necessary.

26. Roles and responsibilities

Chief Executive Officer / Principal

- provides executive oversight of this policy;
- authorises significant or long-term restrictions, or delegates authority appropriately;
- ensures serious risks are escalated and legal or specialist advice is obtained where needed.

Senior Leadership Team

- supports staff and ensures factual records are maintained;

- implements operational restrictions consistently;
- ensures complaints, safeguarding and statutory matters remain appropriately routed;
- reviews restrictions for necessity and proportionality.

All staff

- remain calm, courteous and professional;
- do not retaliate or use inflammatory language;
- report threats, abuse, safeguarding concerns or serious incidents;
- retain relevant evidence;
- follow agreed communication and site restrictions.

27. Interaction with other policies

- Complaints Policy;
- Safeguarding and Child Protection Policy;
- Behaviour Policy;
- Health and Safety Policy;
- Equality, Diversity and Inclusion Policy;
- Data Protection and Privacy policies;
- Staff Code of Conduct;
- Visitor and Site Security arrangements;
- SEND and EHCP procedures;
- Whistleblowing arrangements.

28. Monitoring and review

The Board / Governing Body will approve this policy and it will be reviewed at least annually, or earlier following significant legislative, regulatory or organisational change, a serious incident, or learning arising from implementation. Senior leaders should monitor the use of formal restrictions to support consistency, proportionality and organisational learning.

29. Board assurance statement

This policy is intended to protect the rights, safety and wellbeing of learners and staff while preserving fair access to legitimate complaints, safeguarding and statutory routes. It should be applied consistently, without discrimination, and on the basis of recorded evidence, proportionality and individual circumstances.

Appendix 1: Restriction decision record

This template should be completed where a formal restriction is imposed and retained with the supporting evidence.

Individual / representative	
Learner connection (if applicable)	
Decision-maker	
Date of decision	
Behaviour / incidents relied upon	

Evidence considered	
Risk / impact identified	
Restriction imposed	
Essential communication route	
Effective date	
Review date	

Appendix 2: Suggested wording for a formal restriction notice

The following wording is a template and should be tailored to the evidence and circumstances of the individual case.

Subject: Communication / access arrangements

We remain committed to receiving necessary information and to dealing appropriately with legitimate concerns. However, following consideration of the recent conduct set out below, Salt has decided that proportionate arrangements are necessary to protect staff, learners and the effective operation of the organisation.

[Set out factual incidents, dates and impact.]

With effect from [date], the following arrangements will apply: [set out precise restriction]. Essential educational, safeguarding and statutory communication may continue through [route]. These arrangements will be reviewed on [date], or earlier if circumstances materially change.

We expect all future engagement to remain respectful, relevant and consistent with these arrangements.

Document control note

This policy is an organisational governance document and should be read with Salt's current complaints, safeguarding, health and safety, equality, data protection, SEND and site-security arrangements. Before approval, the Board should ensure that any local procedural cross-references, delegated authorities and legal/insurance requirements are aligned with current organisational arrangements.