

Unreasonable Customer Behaviour Policy

Date published: December 2025

Next review: December 2027



West Midlands
Combined Authority



Transport for
West Midlands

Contents

1.	Introduction	3
2.	Aims and Purpose	3
3.	Scope	4
4.	What is unreasonable customer behaviour?	4
5.	Considerations before taking action	5
6.	Warnings	5
7.	How we will respond to incidents of unacceptable customer behaviour	6
8.	Options for restricting service to unreasonable customers	6
9.	Right of Appeal	7
10.	Record Keeping	8
11.	Policy Review	8
	Appendix 1. Examples of Unreasonable Customer Behaviour	9
	Request a copy	10

1. Introduction

- 1.1 West Midlands Combined Authority (WMCA) is committed to providing high quality customer services.
- 1.2 We believe that all customers have the right to be heard and welcome feedback to improve what we do and how we work. We receive lots of enquiries each day, most of which are resolved first time. However, if a customer is unhappy with the response they receive, they can make a formal complaint.
- 1.3 Our Customer Feedback and Complaints Handling Policy explains what our customers can expect if they make a complaint. This can be found in the [policy section on our website](#).
- 1.4 From time to time, customers can become upset, angry or frustrated and we will always do our best to understand and find a solution for the people we serve. We understand that some of our customers have different needs and may need additional support. Occasionally our colleagues may deal with a very small number of customers whose behaviour is unacceptable.

2. Aims and Purpose

- 2.1 Our Managing Unreasonable Customer Behaviour Policy has been developed to ensure WMCA is proportionate and fair in the way we define this type of customer contact and in the way in which we deal with it. This ensures:
 - All customers, including those whose actions are considered unacceptable, are dealt with fairly, consistently and appropriately.
 - We are clear and transparent about what WMCA will, or will not do, in relation to customers whose behaviour we consider to be unreasonable.
 - We manage the problems unreasonable customer behaviour can have on our colleagues and the ability to carry out our work.
 - Our colleagues understand clearly what is expected of them, what options are available and who can authorise these actions.
 - That other customers and WMCA colleagues / Members do not suffer any disadvantage from customers who act in an unreasonable way.

3. Scope

- 3.1 This policy applies to all customer contact received by WMCA, its colleagues and elected Members of our Committees and Boards as well as contractors working on WMCA's behalf at any of our sites. (Referred to hereafter as “our people”). It applies to contact received via all channels including WMCA's social media accounts and face to face interactions. Unreasonable behaviour by a customer can happen anywhere.
- 3.2 This policy does not apply to customer contact received under the Freedom of Information Act. Requests for information will be handled in accordance with the provisions of the Act. See our Freedom of Information page on the WMCA website for more information: [Freedom of information \(wmca.org.uk\)](https://www.wmca.org.uk/freedom-of-information)

4. What is unreasonable customer behaviour?

- 4.1 Unreasonable customer behaviour is any behaviour, which because of its nature or frequency, raises substantial health, safety, resource or equity issues for WMCA.
- 4.2 Customers who act in an unreasonable way can make it more difficult for WMCA to respond to their enquiries and complaints, as well as other peoples. WMCA has defined unreasonable customer behaviour as follows:
- **Unreasonable Actions**
This includes physical aggression and violence as well as language and behaviour (whether oral or written) that may cause our people to feel afraid, threatened or abused. We expect our people to be treated courteously and with respect. Violence, aggression or abuse towards our people is unacceptable.
 - **Unreasonable Demands**
This includes customers making what WMCA considers to be unreasonable demands on our people through the amount of information they seek, the nature and scale of service they expect or the number of approaches they make.
 - **Unreasonable Persistence**
This includes customers who will not accept that WMCA is unable to assist them further and will not accept a response already given. Customers may persist in contacting WMCA about the same issue resulting in their actions taking up what WMCA considers to be a disproportionate amount of time and resource.

Please refer to Appendix A for further examples of unreasonable customer behaviour.

5. Considerations before taking action

- 5.1 Before deciding if the policy should be applied, the individual needs of each customer will be considered. Some customers may be struggling emotionally or mentally or may have difficulty understanding WMCA's processes for contact and complaints handling. This may have an impact on their behaviour and or communication style and frequency. The policy acknowledges that each event must be addressed on a case-by-case basis. Applying a one size fits all approach, risks putting individuals at an unfair disadvantage and therefore individual circumstances will always be considered.
- 5.2 Checks will be made to ensure that the customer's enquiry has been fully investigated and responded to correctly and adequately and that no new information is available to alter WMCA's view.

6. Warnings

- 6.1 If any colleague or Member of WMCA experiences unreasonable customer behaviour this should be reported to their line manager in the first instance, who will raise this with the Head of Customer Experience.
- 6.2 The Head of Customer Experience (or other nominated manager) will send a written warning to the customer. The warning will explain why their behaviour is causing concern and ask for this behaviour to change. This could include asking a customer to modify the language that they use when communicating with WMCA or reducing the number of contacts being sent about the same issue. The customer will also be warned of the possible actions that may be taken if their unreasonable behaviour continues.
- 6.3 If it is not possible to issue a written warning to the customer (where address/email details are not available), the warning will be documented and may be issued verbally by the Head of Customer Experience or another manager. The details of this action will be recorded in WMCA's CRM System.
- 6.4 In extreme cases and to protect our people, a warning will not be given. For example, when a physical threat is made.

7. How we will respond to incidents of unacceptable customer behaviour

- 7.1 The threat or use of physical violence, verbal abuse or harassment of our people is likely to result in the ending of all direct contact with the customer. Incidents may be reported to the police. This will always be the case if physical violence is used or threatened. Further information is available in WMCA's Work Related Violence policy.
- 7.2 WMCA records all calls to our customer services teams. If a customer's behaviour on the telephone is unreasonable, they will be informed that the call will be ended if the behaviour does not stop. Continued unreasonable behaviour could result in a customer being transferred to another colleague, them being placed on hold, or the call being ended.
- 7.3 Letters, emails or other forms of digital contact that are considered abusive, offensive, threatening or otherwise unreasonable, may not be responded to. Any responses that are sent will address the unreasonable behaviour as well as inform the customer that any future instances will result in their correspondence not being responded to.
- 7.4 Our people will remove themselves from face-to-face situations where a customer's behaviour is unacceptable and or they consider themselves to be at risk. Our people will report incidents to our CCTV Control room and where available, WMCA may secure and use CCTV evidence to report unacceptable customer behaviour. This includes onward reporting to the police. Further information regarding our use of CCTV can be found in our [CCTV - Code of Practice](#). Lone workers may be at greater risk and therefore further information is available in WMCA's Lone Worker Policy.

8. Options for restricting service to unreasonable customers

- 8.1 If unreasonable behaviour continues after a warning has been issued, the Head of Customer Experience will refer the matter to the Director of Integrated Transport Services (or other nominated Director) to decide the appropriate level of action including the extent to which customer contact should be limited.
- 8.2 Any action taken will be proportionate to the nature and frequency of the customers' contacts and their behaviour. Action taken will usually be time limited. In some situations, it may be appropriate for a restriction to apply indefinitely (for example where a specific matter has been fully considered and there is no new material to alter a further investigation into the matter).

The nominated Director may consider applying a range of restrictions including but not limited to:

- Placing limits on the number and duration of contacts with our people per week or month
- Limiting the customer to one method of contact (telephone, letter, email etc)
- Requiring the customer to communicate with only one named Team or individual as specified by WMCA
- Declining to register and process further correspondence and complaints about the same subject
- Informing the customer that future correspondence will be read but not acknowledged or responded to unless substantially new matters are raised
- Prohibiting a customer from accessing WMCA property and facilities
- Restricting the individual's email address or telephone number from being received by WMCA (applicable in extreme circumstances after all other options have been exhausted)

8.3 The nominated Director will write to the customer to confirm the action and or restrictions being applied including the timeframes applicable and provide the customer with a copy of the Managing Unreasonable Customer Behaviour Policy. In doing so, this should not result in the reduction or removal of any prior agreed reasonable adjustments with respect to the individual needs of the customer.

8.4 The details of this action will be recorded in WMCA's CRM System and be reviewed either in line with the timeframes applied or if the nature and frequency of contact with the customer changes.

9. Right of Appeal

9.1 Customers have the right to appeal against a decision to apply this policy and or any restrictions applied. Appeals should be made in writing explaining why the customer believes the decision and or restrictions to be incorrect.

9.2 If an appeal is received, it will be considered by a director who has not considered the matter before. The customer will be advised of the outcome in writing and, if restrictions are to continue to apply, when these will next be reviewed. If restrictions are removed, urgent consideration will be given to reapplying restrictions if the behaviour which led to the original decision occurs again.

9.3 In line with the timescales that have been set, restrictions should be removed and relationships returned to normal unless there are good grounds to extend them.

9.4 A decision to apply the policy and or apply restrictions in place may be amended further by WMCA if unacceptable behaviour continues.

10. Record Keeping

- 10.1 WMCA will maintain a register of decisions made regarding customers and any action and restrictions that are applied. The register will be kept up to date by the Customer Experience Team and include:
- The name and contact details of each customer where a decision has been made to apply the Unreasonable Customer Behaviour Policy
 - What restrictions have been implemented
 - When any restriction came into force and when it will be reviewed
 - Details of any appeals received and the outcome
- 10.2 In addition, all correspondence or interactions with the customer including written and verbal will be documented in WMCA's CRM System against the customer's contact record.
- 10.3 If a customer continues to communicate with WMCA after restrictions on contact have been applied, new contacts will be checked to identify any significant new information. If there is no new information and a response is not to be provided in line with restrictions, this will be documented in WMCA's CRM system.

11. Policy Review

- 11.1 This policy will be reviewed as part of a routine cycle of review or in response to a new requirement.

Appendix 1.

Examples of Unreasonable Customer Behaviour

Examples of actions and behaviours that WMCA considers to be unreasonable customer behaviour are listed below. This list is not exhaustive and action may be taken under this policy if one or more of the following occur, or any other behaviour WMCA defines as unreasonable.

Unreasonable Actions

- Physical violence towards our people
- Personal verbal abuse, derogatory remarks and rudeness towards our people
- Threats, harassment and other attempts to intimidate our people
- Use of foul, offensive or discriminatory language
- Contact designed to cause disruption or annoyance including inflammatory statements
- Unsubstantiated allegations including unjustified complaints about our people who are trying to deal with the issues and seeking to have them replaced

Unreasonable Demands

- Insisting a complaint is dealt with in ways which are not compatible with WMCA's Complaints Handling Policy
- Demanding responses within an unreasonable timeframe
- Persistently demanding to see or speak to a particular colleague(s)
- Continuing to raise issues that fall outside the remit of WMCA and refusing to accept this once notified
- Continual phone calls, emails or other customer contact including via Social Media channels
- Raising concerns or complaints without grounds and failing to specify the grounds despite offers of assistance
- Raising many detailed questions without serious purpose or value and insisting they are all answered
- Providing excessive or irrelevant information
- Refusing to cooperate with the complaints investigation process whilst still wishing a complaint to be resolved

Unreasonable Persistence

- Persistent refusal to accept a decision or accept an explanation made by WMCA
- Continuing to pursue a concern without presenting any new information
- Repeatedly making the same complaint, sometimes with minor differences and insisting this is a new issue that requires consideration
- Adopting an excessive and widespread approach to communications with WMCA e.g. by submitting the same/similar complaints to WMCA and/or other external stakeholder(s) at the same time for example, a Member of Parliament or other Local Authorities or; by persistently communicating with and pursuing complaints and issues through different WMCA contacts and departments at the same time
- Continuing to pursue a complaint that relates to an issue based on a historic and irreversible decision or incident
- Refusing to accept the outcome of the complaints process after its conclusion, repeatedly challenging the outcome, and or denying that an adequate response has been given
- An unreasonable level of customer contact with WMCA, by any means, in relation to a specific complaint or issue
- Excessive demands on WMCA resources including lengthy phone calls and multiple emails

Request a copy

To request a copy of this document in a format better suited to your needs, please contact us on [0345 303 6760](tel:03453036760).