

### Unreasonably Persistent Complaints: Stage 3 - Annex A

4.8 Heads of Division should, where a complaint is referred to them for a decision, determine whether a complaint is taking into account all the circumstances of the case - including whether the customer is seeking legitimate points for clarification or issues that are genuinely new. In forming a judgement, the HoD should take into account the complaint's context and history.

Examples of an unreasonably persistent complaint might be where:

- the complaint(s) reflects an obsessive approach eg repetition of the same issues despite previous responses which are considered by the HoD to deal with the issue(s) and which are reasonable and proportionate;
- the complaint(s) appears designed solely to cause disruption or annoyance.

4.9 If a complaint is deemed unreasonably persistent, refer to Annex B section 1 and Annex C.

## Annex B

### 1. Directors/Heads of Division should:

- a. Ensure this guidance is brought to the attention of their staff;
- b. Ensure Line Managers carry out their role as set out in section 2 below;
- c. Maintain a system to record all complaints received as set out in paragraph 4.11 of the main body of this guidance;
- d. Obtain assurance that the policy and procedures in this guidance are complied with and that lessons are being learned;
- e. Determine whether any referred complaints are unreasonably persistent. If so, ensure that the factors informing the decision are adequately documented, alert the CE's Office of the decision and inform the customer (see Annex D). If a customer appeals the decision, arrange for it to be reviewed by an independent HoD: follow the arrangements in section 4.
- f. Arrange for data, as defined in para 4.19, to be forwarded to PFPD, as requested, for performance reporting purposes.