

## **NS&I Unreasonable Customers Policy**

## **Introduction**

NS&I are committed to providing excellent service in all our dealings with customers and treating customers fairly. However, we acknowledge that sometimes things go wrong and if this happens we will endeavour to put things right as soon as possible. Complaints made to NS&I will be considered in accordance with our Complaints Procedure, which can be found at:

<https://www.nsandi.com/files/asset/pdf/complaints-brochure-print-friendly.pdf>

We also recognise that there are times when we may not be able to resolve an issue to the customer's satisfaction and we will provide details of any process to enable the customer to escalate their complaint or issue to the relevant authority.

Occasionally we receive communications or encounter customer behaviour that is unreasonable in nature. This may be, for example, because communications are either vexatious and/or frivolous, or they are persistent, repeated or otherwise cause considerable disruption to our work. Unreasonable communications and complaints are time consuming to resolve, and it is appropriate to consider the time and cost involved in handling these types of communications in deciding what steps will be taken by NS&I as a result. Unreasonable communications and customer behaviour can also have a detrimental effect on the well-being of our staff who manage these complaints.

When assessing communications from customers we will take into account the personal circumstances of that customer, such as any vulnerability, and/or relevant protected characteristic, before we make a decision about how we will deal with the matter going forward. We will also keep under review whether any reasonable adjustments may be necessary to ensure that customers with a disability are not placed at a substantial disadvantage in their communications with NS&I.

Whilst complaints made about NS&I will be considered on their merits and in accordance our Complaints Procedure where appropriate to do so, we cannot always look at a complaint or issue in isolation and will need to consider any previous complaints, issues, and behaviours before we make any decision. We will therefore review the nature of the complaint, the number and content of any previous complaints, and customer behaviour to determine if the behaviour is unreasonable in nature.

NS&I has a duty of care to all of its customers and its staff, and we consider that unreasonable and/or persistent contact by one customer can hinder our ability to meet the needs of other customers.

## **Unreasonable communications and behaviour**

The following is a list of examples of what NS&I may deem to be unreasonable, vexatious or persistent behaviours. This is not an exhaustive list and NS&I will consider whether the nature of communications received is unreasonable where appropriate to do so.

- Refusing to give specific details of the complaint or issue;
- Pursuing complaints and/or grievances that are not genuine;

- Refusing to allow reasonable time to investigate the complaint or issue and continually chasing for a response, or insisting that it is dealt with outside our processes and/or usual timescales;
- Changing the basis of the complaint or issue as the complaint or issue progresses;
- Raising repeated or numerous detailed questions and insisting they are answered, especially where a response to the questions has been previously provided;
- Raising or escalating the same issue with a variety of people within NS&I at the same time without waiting to receive a response to the original complaint or enquiry;
- Making excessive demands on the time and resource of staff with lengthy communications (letters or emails) or telephone calls, or repeated communications, expecting an immediate response or acknowledgement without allowing time to respond to the initial complaint or enquiry;
- Submitting repeat requests with minor additions or variations and insisting these be dealt with as new complaints or enquiries;
- Harassing or pressurising an individual member of staff by making unreasonable or repeated demands including using threatening, aggressive or intimidating behaviour towards staff members;
- Continuing to correspond about an issue when final responses have been provided, particularly when such final responses include rights of referral to other relevant authorities;
- Continually making complaints about any member of staff when the complaint has been assessed and deemed to lack merit; and/or
- Recording meetings and conversations with staff members without their knowledge or prior agreement

### **Our process for responding to unreasonable communications and/or behaviour**

If a customer acts in a way which our staff consider to be unreasonable, they may refer the complaint to the NS&I Head of Complaints Assurance or the NS&I Head of Compliance who will determine whether the behaviour being displayed could be deemed to be unreasonable in line with this policy.

If the customer's behaviour is not considered to be unreasonable it will be returned to the relevant department to be dealt with in accordance with NS&I's existing Complaints Procedure.

If the customer's behaviour is deemed to be unreasonable the NS&I Head of Complaints Assurance and the NS&I Head of Compliance will determine what course of action (if any) is required.

This may include one of more of the following steps being taken:

- A note may be made on the customer's record to advise that the customer's behaviour is unreasonable in nature as defined by this policy;
- NS&I may write to the customer to advise and/or warn them that we consider their behaviour to be unreasonable in nature, our reasons for doing so, and ask them to refrain from repeating that behaviour;
- We will also consider at this point whether it would be appropriate to limit communication methods with the customer. This may include, for example, limiting communications to letter/post or to specific, named members of staff;
- We will monitor any further communications with the customer for a period of 6 months. If no further unreasonable behaviour is observed, NS&I will take no further action unless unreasonable behaviour resumes; and/or
- If the customer continues to demonstrate unreasonable behaviour, we will consider whether it is appropriate to close the customer's accounts and/or restrict their access to NS&I.

Where behaviour demonstrated by a customer is particularly serious or extreme such that it may threaten the immediate safety and welfare of our staff, we may report the matter to other authorities and/or consider taking legal action as appropriate without prior warning to the complainant.

#### **Repeated unreasonable behaviour**

If NS&I continues to observe unreasonable behaviour, notwithstanding any restrictions or other measures put in place, we may advise the customer that continuation of such behaviour will lead to NS&I giving the customer notice that it will close all the accounts the customer holds with NS&I. Decisions to close accounts will be agreed by the Director of Savings or a member of the Executive Committee.

#### **Access to the Financial Ombudsman Service**

Where a customer remains dissatisfied with a decision made by NS&I in accordance with our Complaints Procedure, they may contact the Financial Ombudsman Service (the "FOS").

However, the FOS may dismiss a complaint without considering its merits if the complaint is frivolous or vexatious,