



Customer Behaviour Policy

Version 1

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Review Date: September 2027

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Responsible GM	Nathan Kearsley	
Division	Organisational Performance	
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1. Background

Latrobe City Council (Council) is committed to providing a welcoming and inclusive environment for all in our community. Council has zero tolerance for disrespectful, anti-social, aggressive and/or dangerous behaviours which pose a threat to the wellbeing and safety of Councillors, Council staff (staff) and customers.

The purpose of the Customer Behaviour Policy (Policy) is to ensure Councillors and staff are able to carry out their roles in an environment where their health, safety and security is protected. This policy aligns with Council's operational procedure, Preventing and Responding to Occupational Violence.

Under the *Occupational Health and Safety Act 2004* (OHS Act) the following applies so far as reasonably practicable:

- employers must provide and maintain a working environment for their employees, including contractors, that is safe and without risks to health including psychological health (refer Section 21).
- employers must ensure persons other than employees are not exposed to risks to their health or safety arising from the conduct of the undertaking of the employer (refer Section 23).

2. Objectives

This Policy aims to:

- Provide a safe and secure environment to conduct business in a respectful and professional manner.
- Outline Council's expectation that all customers behave in a respectful and reasonable manner.

3. Scope

This Policy covers all inappropriate and unacceptable behaviours across all Council services or facilities and applies to:

- All customers of Council.
- All communications channels, including but not limited to in person, telephone, in writing (mail, email, letters to media) and social media.

Council recognises that members of the public have the right to complain and have complaints handled objectively. This Policy does not restrict a customer's right to make a complaint, when done so in a respectful and courteous manner.

This policy is supported by the requirements of the Councillor Code of Conduct and Staff Code of Conduct.

4. Principles of Management

Council has a responsibility to ensure Councillors and staff feel safe and supported, along with a duty of care to our customers. Council has a risk management approach that is prompt, planned and systematic, to prevent and respond to inappropriate and unacceptable behaviours including occupational violence and aggression (OVA).

4.1. Unreasonable Customer Behaviour

Unreasonable customer behaviour can take many forms, with some of the most common including:

- Arguing with Councillors or staff.
- Confronting Councillors or staff about their competency.
- Requesting impossible timeframes.
- Not accepting the limitations and procedures in place.
- Verbal and non-verbal threats, intimidation and/or discrimination.

Councillors and staff will make every effort to understand the possible reason for such behaviour to assist Councillors and/or staff with providing appropriate responses. The ideal outcome is for Councillors and/or staff and customers to reach an agreement and adopt positive behaviours.

4.2. Unacceptable Customer Behaviour

Unacceptable customer behaviour can take many forms, with some of the most common including (all of which will not be tolerated):

- Threats of violence.
- Threats with weapons.
- Spitting and other aggressive behaviours, sneering, yelling.
- Verbal abuse/Offensive language.
- Discriminatory behaviour or language.
- Personal or discriminatory attacks on social media.
- Disruptive behaviour/ Disturbing others.
- Throwing objects.
- Property damage/Inappropriate use of property.
- Physical assault such as pushing, shoving, tripping and/or grabbing.
- Physically intimidating someone such as standing over them.
- Preventing someone from undertaking their work tasks.

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- Extreme violent acts such as punching, kicking, strangulation and sexual assault.

4.3. Responses to Unreasonable and Unacceptable Customer Behaviour

Responses to unreasonable and unacceptable customer behaviour will vary depending on the scale and severity of the incident. Immediate steps taken may include requesting the customer to leave the Council facility and/or contacting Victoria Police where appropriate.

The following further steps may also be taken.

4.3.1. Limiting contact

- Where a customer is demonstrating any unreasonable/unacceptable behaviour, Council may restrict the customer to a single point of contact. The single point of contact is likely to be a Manager or General Manager and have Chief Executive Officer (CEO) approval.
- The single point of contact may set timeframes for responses that are outside of Council's usual service timeframes. The impacted customer will be notified of these response times in writing at the time of establishing the single point of contact arrangements.

4.3.2. Modifying communications medium

- In response to unreasonable/unacceptable behaviour, Council may notify the customer in writing that their contact with Council is being restricted to a specific medium, for example, only in writing or only by telephone.

4.3.3. Warning of Exclusion

- Where a customer's behaviour impacts Councillor and/or staff health, safety or security, a letter may be sent advising that an exclusion letter will be sent should the behaviour continue. This must be in writing and be approved and signed by the relevant General Manager.

4.3.4. Exclusion

- Where a customer's behaviour impacts Councillor and/or staff health, safety or security, Council may exclude the customer. A warning letter (refer Section 4.3.3) is not required to be issued prior to a decision to exclude.
- A decision to exclude a customer from any/all services and facilities can be applied and will be assessed on a case-by-case basis. A recommendation on which services the customer should be excluded from, and the length of the exclusion will be approved by the relevant General Manager. The customer will be notified of the exclusion in writing and signed by the CEO. This letter will include:
 - The period of time the exclusion applies from the date of receipt;

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- Details of facilities the exclusion applies to;
- A summary of the type/s of behaviour/s that led to the exclusion being applied; and
- Reference to the customer's right of appeal.

4.3.5. Expulsion

- In exceptional circumstances, a permanent expulsion from one or more Council services or facilities may be the determined outcome and must be authorised by the CEO.
- Such a decision would be made on the basis that repeated attempts to implement strategies to address unreasonable/unacceptable behaviour have failed and an assessment that the customer poses significant risk to a person or property.

4.3.6. Breach of an Exclusion

- If a customer attends a service or facility they are currently excluded from, Councillors and/or staff will verbally remind the customer of the exclusion and inform them that their presence constitutes a breach.
- If the purpose of the customer's attendance is to enquire about the date of their exclusion expiring, they will be provided with the information promptly and asked to leave immediately. This does not constitute a breach.
- If the customer refuses to leave, Victoria Police will be called, and a breach of exclusion notice will be sent to the customer. This may result in an extension of the exclusion period.
- Further breaches may result in reporting those breaches to Victoria Police on the basis of trespass.

4.3.7. Social Media

- Council's Social Media Policy outlines appropriate behaviours by users.
- All moderation will be done at Council and the platform's discretion, and can be applied to any post, comment, or interaction that is deemed inappropriate. Council may take the discussion 'offline' or into a private channel if the content is personal in nature or is affecting the enjoyment of the page for other visitors. If it is deemed appropriate to block the user, approval from the CEO will be obtained.

4.3.8. Phone Calls

- If Councillors or staff are unable to de-escalate the situation or if a caller becomes abusive, they will:
 - Advise that the call will be terminated if the behaviour continues; and if necessary

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- Escalate the call to a supervisor if possible, providing them with details of what has occurred and a description of the behaviour the customer is displaying; or
- If a supervisor is not readily available, terminate the call.

Note: If a call is terminated before being able to notify a supervisor, details of the call will be provided to a supervisor as soon as possible.

4.4. Appeals

- A customer who has been informed of a change or restriction to access to Council services or facilities has the right to one appeal of that decision. The appeal must be lodged in writing and the review will be undertaken by the CEO or delegate.
- The customer will be informed of the CEO or delegate's decision in writing.
- If the customer is dissatisfied with the appeals process decision, they may seek a review from the Victorian Ombudsman to assess procedural fairness.
- Refer to Council's [Complaints Handling Policy](#) for further information.

5. Accountability and Responsibility

5.1. Chief Executive Officer (CEO)

- The CEO or delegate will approve exclusions and may choose to completely terminate a customer's access to Council facilities and/or services.
- The CEO or delegate is responsible for reviewing any appeals requested by customers in relation to decisions to change or restrict access.

5.2. General Manager

- Ensure that this policy is effectively implemented in their areas of control;
- Approve and sign warning letters;
- Approve exclusion requests; and
- Support their managers/supervisors/coordinators and hold each accountable for their specific responsibilities.

5.3. Manager/Coordinator/Team Leader

- Take all practicable measures to ensure a safe workplace and safe systems of work, by implementing the requirements of this policy.

5.4. Councillors and Staff

- Adhere to the requirements of this policy to ensure their own health and safety and the health and safety of others in their workplace;
- Identify and report any concerns through the organisation's agreed procedures; and
- Cooperate with others in seeking appropriate solutions to prevent and manage inappropriate and unacceptable behaviour.

6. Definitions

Customers	Customers, visitors, clients, community members interacting with Councillors or staff or who are accessing services or attending facilities provided by Latrobe City Council.
Occupational Violence & Aggression (OVA)	Any incident in which the person is abused, threatened or assaulted in circumstances relating to their work.
Council staff (staff)	Employees, contractors and volunteers that are carrying out service delivery on behalf of Latrobe City Council.
Facilities	Any building or location, owned or managed, by Latrobe City Council
Services	Any service provided by or on behalf of Latrobe City Council, including Council's digital communication platforms.
Unreasonable and Unacceptable Behaviour	Behaviour or conduct by a customer that due to its intensity, nature or frequency is considered to impact negatively on the health, safety or security of others.

7. Related Documents

[Complaints Handling Policy](#)

[Privacy Statement](#)

[Privacy Policy](#)

Preventing and Responding to Occupational Violence Operational Procedure

8. Reference Resources

[Occupational Health and Safety Act 2004 \(Vic\)](#)

[Occupational Health and Safety Regulations 2017 \(Vic\)](#)

[Privacy and Data Protection Act 2014 \(Vic\)](#)