**Irish Cattle Breeding Federation Society Limited (“ICBF”)**

**Unreasonable Behaviour Policy**

ICBF has approved a Policy for dealing with unreasonable behaviour that may occur during any type of interaction between ICBF and its customers or other persons. This policy has been published on the ICBF website [here](https://www.icbf.com/legal-privacy/).

**What is considered unreasonable behaviour?**

While unreasonable behaviour can take many forms, ICBF considers that there are six main types of unreasonable behaviour comprising:

1. **Unreasonable conduct**: Examples of unreasonable, and possibly abusive, conduct (whether oral or written) towards staff include threats; physical violence; verbal abuse; bullying or harassment; making untrue allegations; derogatory remarks; inflammatory statements; rudeness; or attempting to provoke officials into engaging in unnecessary and time-wasting argument or confrontation.
2. **Provocation**: This may include an individual being vexatious, seeking to provoke or create discord, begin arguments or cause upset via online posts or comments. Email or other means of communication can be considered to be aggressive or intimidating communications. However, there is a difference between a post that is critical of ICBF and one that is targeted at named staff.
3. **Unreasonable level of cooperation and a failure to cooperate**: This may be demonstrated by an individual: failing to clearly define the issue or to respond to communications; presenting large volumes of documentation in a disorganised way; changing the substance of the issue while it is being dealt with or while clarification is being sought; or, withholding information, untruthfulness or being deliberately vague. It may also include non-cooperation generally which may hinder, obstruct, or delay the issue being dealt with.
4. **Unreasonable arguments**: Examples of this could include an individual placing excessive emphasis on relatively trivial or irrelevant issues; advancing theories that are unsupported by any evidence; or, an insistence that their version of events be acknowledged as fact despite a lack of evidence to substantiate that conclusion.
5. **Unreasonable demands**: An individual may, for example, demand an unrealistic solution or one that is disproportionate or inappropriate to their situation. They may express strong opinions as to how they think ICBF should implement a scheme or insist that ICBF involve itself in a matter outside its remit.
6. **Unreasonable persistence**: This generally involves an individual persisting with an issue that has already been investigated and/or dealt with and the matter resolved/closed by ICBF. The persistence may present itself in several ways, for example, by demanding that the same (or slightly changed) issue be looked at repeatedly.

Such behaviours may occur in person, such as at meetings, by telephone, online, or through written correspondence. These behaviours will in the main be recurring but there may occasionally be one off instances.

**Options for managing unreasonable behaviour**

The actions we are most likely to consider taking in response to such behaviour are set out below. However, other actions may also be taken depending on the nature of the unreasonable behaviour.

• Contacting the individual to explain how their behaviour is not acceptable

• Asking the individual to agree on how they will behave in future interactions

• Limiting contact to a particular contact channel (e.g. in writing only)

• Limiting contact to a single named ICBF officer

• Limiting the frequency of telephone calls (e.g. to specified days and times)

• Restricting email communication

In circumstances involving one-off instances of unreasonable behaviour such as a customer being abusive or aggressive, you should advise the customer that such behaviour is unacceptable and that if it does not cease you will take steps to remove yourself from the situation such as terminating the phone call or leaving the meeting.

Future communications relating to the same issue where the matter has already been dealt with may be read and acknowledged.

**Procedures for invoking the Unreasonable Behaviour Policy**

If you are experiencing any of the behaviours specified above or any other behaviour that you consider to be unreasonable, you should make detailed records of the instances.

If it appears that is or may become an ongoing issue you should discuss the matter with your Line Manager.

You should also contact the customer and advise them that you consider their behaviour to be unreasonable and to explain why and that if it continues you will be invoking this Policy.

Should the behaviour continue, you should complete the form below, have it approved by your Line Manager and then notify the customer that the Policy has been invoked and the action that you propose to take – draft letter below.

The Line Manager should keep records of the incidences of when this Policy has been invoked.

**Review of restriction**

Where this Policy has been invoked this should be reviewed by the Line Manager prior to the expiry of the relevant period of invocation.

Upon review the Line Manager can decide to vary or extend the terms applying or can decide to take no further action.

It is open to the customer to seek a review of the decision to invoke this Policy, this review will be conducted by the ICBF Chief Executive. The request to review the decision must be submitted to query@icbf.com and include the reference number provided in the communication to you informing you that this Policy has been invoked.

The implementation of this Policy does not prejudice an individual’s right to raise relevant issues under ICBF’s Complaint Handling Procedure, where appropriate.