Gloucestershire Archives @ The Hub

Unacceptable Behaviour Policy

1. Policy statement and purpose

Gloucestershire Archives is committed to providing a professional, accessible and fair service and a safe environment for customers, staff, volunteers, partners and contractors. We recognise that people may contact us when they are distressed, frustrated or dissatisfied. Disagreement, persistence or forceful communication are not in themselves unacceptable.

This policy explains how we will respond when behaviour has an unreasonable impact on other people, the safety or security of the service, or our ability to deliver services effectively. We will act consistently, fairly and proportionately, consider individual circumstances and communication needs, and make reasonable adjustments where required. Threatening, abusive, discriminatory or violent behaviour will not be tolerated.

2. Scope

This policy applies to anyone who accesses or interacts with Gloucestershire Archives services, including customers, researchers, visitors, volunteers, work-experience participants, depositors, donors, partners and contractors. It covers behaviour in person and through telephone calls, letters, email, online meetings, social media and other digital channels.

It protects Gloucestershire Archives staff and volunteers and other people using or working within the Gloucestershire Heritage Hub. Concerns about the conduct of Gloucestershire County Council employees will be managed under the Council's relevant employment and disciplinary procedures rather than this policy.

3. Terminology

Unacceptable behaviour is behaviour that, because of its nature, severity, frequency or impact, is likely to cause harm, fear, harassment, distress or significant disruption, or to place unreasonable demands on the service.

Restriction means a proportionate, time-limited measure governing how a person may contact or use the service. It does not remove the requirement to consider the substance of a legitimate enquiry, complaint or access request.

Reasonable adjustment means a change made to avoid or reduce a substantial disadvantage experienced by a disabled person when accessing the service.

4. Background

Gloucestershire Archives gathers archive collections and local and family history resources to ensure they are kept secure and made accessible.

We are an accredited archive service recognised by The National Archives as the place of deposit for public records relating to Gloucestershire and South Gloucestershire.

We are a Gloucestershire County Council service. By agreement, we also provide an archive service for South Gloucestershire Council and are the appointed Record Office for the Diocese of Gloucester.

We are a lead partner in the Gloucestershire Heritage Hub, a network of local people and organisations with a common interest in our historic county's documented heritage.

5. Our principles

- We will treat people with dignity and respect and expect the same consideration for staff, volunteers and other service users.
- We will distinguish unacceptable behaviour from understandable distress, frustration, disagreement, persistence or assertiveness.
- We will take account of the circumstances, available evidence, communication needs, language barriers, disability and neurodiversity, and consider reasonable adjustments.
- We will put safety first and may take immediate action where there is a serious or imminent risk.
- Our response will be necessary, proportionate, evidence-based and no more restrictive than required.
- Except where the behaviour or risk is sufficiently serious to justify immediate action, we will explain what is unacceptable and give the person an opportunity to change their behaviour.
- We will continue to consider any legitimate enquiry, complaint or request, although we may manage how it is submitted or answered.
- We will record, communicate, monitor and review formal restrictions.

6. What we mean by unacceptable behaviour

Depending on its seriousness, frequency, context and impact, unacceptable behaviour may include:

- violence, attempted violence, threatening conduct or conduct that creates a reasonable fear for safety;
- abusive, intimidating, aggressive, insulting, degrading or persistently offensive language or gestures;
- discrimination, harassment or victimisation, including conduct related to a protected characteristic;
- malicious, knowingly false or personally targeted allegations;
- vandalism, criminal damage, theft, deliberate damage to collections, or misuse of Gloucestershire County Council equipment or systems;
- refusal to follow reasonable safety, security, access or collections-care instructions;
- unwanted, excessive or repeated contact that unreasonably consumes staff time, including repeatedly raising matters that have already been fully addressed without presenting relevant new information;
- unreasonable demands about timescales, outcomes, staff involvement or methods of contact that interfere with delivery of the service;
- publishing personal information about staff or volunteers, or recording them where this is prohibited or creates a safety or privacy risk; and
- conduct through email, telephone, online meetings, social media or other digital channels that would be unacceptable in person.

The examples above are not exhaustive. Decisions will be based on the behaviour and its impact, not simply on a person's persistence, communication style or disagreement with the service.

7. How we will respond

7.1 Immediate response

Any member of staff may take reasonable immediate action to protect people, collections, premises or systems. This may include pausing or ending a conversation, not responding further to abusive content, asking a person to leave, seeking assistance, or contacting emergency services or the police. Where it is safe and appropriate, the person will first be told which behaviour must stop and what will happen if it continues.

7.2 Recording and initial review

The incident will be recorded factually and reported promptly to a member of the archives management team. The record should include the behaviour, context, impact, action taken, available evidence, witnesses and any relevant communication needs or reasonable adjustments. The manager will assess the seriousness, frequency and risk, including whether other Council procedures should be used.

7.3 Warning

Unless the risk or severity requires immediate restriction, the person will normally receive a clear warning. This will identify the behaviour of concern, explain the standard expected and state the possible consequences of repetition.

7.4 Formal restrictions

Where previous action has not been effective, or where the behaviour or risk is sufficiently serious, a member of the archive management team may impose a proportionate restriction. This may include:

- contact through a named member of staff or a single communication channel;
- limits on the frequency, duration or subject of contact;
- appointment-only access, additional supervision or specified conditions of entry;
- not responding to repetitive correspondence unless relevant new information is provided;
- temporary restriction or exclusion from the premises; or
- referral to another Gloucestershire County Council process or to the police.

Where practicable, the decision will be given in writing and will explain the reasons, scope, duration, review date, permitted route of contact and how the decision may be challenged. Restrictions will not be used as a substitute for handling a legitimate complaint or enquiry.

7.5 Review and ending restrictions

Restrictions will be reviewed on the stated date, and sooner if circumstances materially change. The review will consider current risk, subsequent behaviour, whether reasonable adjustments remain appropriate and whether the restriction is still necessary and proportionate. It will be amended or removed when no longer required.

8. Roles and responsibilities

All staff and volunteers should behave professionally, follow safety procedures, make appropriate adjustments within their role, record incidents accurately and report concerns promptly.

A member of the Archives Management Team is responsible for assessing incidents, supporting those affected, ensuring that relevant evidence and equality considerations are addressed, issuing warnings and escalating matters where necessary. A second member of the Management Team is responsible for approving significant or service-wide restrictions,

ensuring decisions are reviewed, and consulting relevant Gloucestershire County Council services where appropriate.

Gloucestershire County Council specialist services, which may include Human Resources, Information Management, the corporate complaints team, health and safety, legal services, security and the police, will be consulted where their responsibilities or expertise are appropriate.

9. Reporting unacceptable behaviour or challenging a decision

Anyone who has experienced or witnessed unacceptable behaviour may contact Gloucestershire Archives:

Telephone: 01452 425295
Email: archives@gloucestershire.gov.uk
Post: Head of Archives Service, Gloucestershire Archives, Gloucestershire Heritage Hub, Clarence Row, Alvin Street, Gloucester GL1 3DW

A person who wishes to complain about the service or the conduct of a member of staff may also use Gloucestershire County Council's corporate complaints process. A person who wishes to challenge a restriction should use the route stated in the decision letter. The review will, where practicable, be undertaken by a manager who was not the original decision-maker.

10. Equality, diversity, inclusion and reasonable adjustments

Gloucestershire Archives will apply this policy in accordance with the Equality Act 2010 and the Public Sector Equality Duty. We will not discriminate, harass or victimise, and will have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.

Before deciding on a response, we will consider whether disability, neurodiversity, language, literacy, distress or another communication barrier may be relevant and whether a reasonable adjustment could reduce the difficulty. This does not require staff to accept behaviour that creates a genuine risk or significant harm. We will consider the individual circumstances and use the least restrictive effective response.

The policy and its equality impact assessment will be reviewed together. Current Gloucestershire Archives equality, diversity and inclusion information is available at www.gloucestershire.gov.uk/archives/policies.

11. Records, privacy and information sharing

Records of incidents, warnings, restrictions and reviews will be factual, relevant, proportionate, accurate and securely managed. Information will be shared only with people or organisations that need it for a lawful purpose, including the protection of people, collections, premises or systems.

Records will be retained and disposed of in accordance with Gloucestershire County Council's retention schedule and data protection requirements. Any warning marker or information placed on a customer record must have a clear purpose, authorised basis, review date and removal arrangements.

12. Related legislation, standards and policies

This policy should be read alongside:

- Equality Act 2010 and the statutory Code of Practice for services and public functions;
- Health and Safety at Work etc. Act 1974;
- UK General Data Protection Regulation and Data Protection Act 2018;
- The National Archives' Archive Service Accreditation Standard;
- Gloucestershire County Council Unacceptable Behaviour Policy;
- Gloucestershire County Council Corporate Complaints Policy;
- Gloucestershire County Council Warning Flags Policy;
- relevant Gloucestershire County Council health and safety, information governance, safeguarding, employment and security policies; and
- other current Gloucestershire Archives policies.

13. Review and revision

This policy will be reviewed at least every three years or sooner following a serious incident or a relevant legal, corporate, accreditation or operational change. Please write to archives@gloucestershire.gov.uk if you wish to give feedback on this policy.

Document control

Author	Sally Middleton, former Community Heritage Development Manager
Owner	Heather Forbes, Head of Archives Service
Approval body	Gloucestershire Archives Management Team
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Next review	Three years from approval, or sooner if required

Version history

Version	Version date	Summary of changes
1.0	8 October 2021	New policy approved.
1.1	July 2023	Scope extended to online and remote services; contact details for complaints added. Formally approved October 2023.
2.0	October 2026	Substantive review: aligned with current Gloucestershire County Council practice; added definitions, graduated response procedure, updated responsibilities, reasonable adjustments, challenge and review arrangements.

Date of next revision: 2029