

# COMPLAINTS HANDLING AND MANAGEMENT

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## **Tier 3: Procedural Document**

### How Unreasonable Conduct Will Be Handled

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## 1. Introduction

The Community Services Directorate (CSD) is committed to being accessible and responsive to all individuals who approach the Directorate for assistance or seek to lodge a complaint. Our ability to provide the range of services depends on:

- Our ability to do our work and perform our functions in the most effective and efficient ways
- The health, wellbeing, safety and security of CSD staff and
- Our ability to allocate resources fairly across all the Directorate's operations.

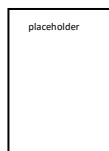
Unreasonable conduct can significantly affect CSD staff members ability to provide a high-quality service. Unreasonable conduct by a service user, complainant or member of the public can significantly drain the Directorate's resources if not properly managed. The Directorate will take fair and decisive action to manage any conduct which negatively and unreasonably affects the Directorate's staff or operations.

This policy is part of CSD's Complaints Handling and Management Policy (CHaMP) suite of documents which ensures the complaints received about CSD services and policies are captured, considered, and responded to in a way which is fair, and leads to improved future CSD services and policies for people using or affected by them. CSD encourages all forms of feedback and opportunities to improve the way we work with individuals who use our services.

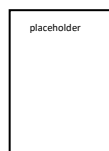
## 2. The complaints policy suite: How to use the documents

The CSD Complaints Handling and Management Policy (CHaMP) suite of documents is designed to support transparency and accountability in relation to how CSD receives and responds to feedback from the community, and how all CSD business units respond to complaints.

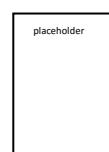
The suite of documents is arranged into three (3) tiers.



The first tier is the primary governing policy concerning complaints handling by CSD. In these documents you will find the fundamental principles and approach CSD has adopted in relation to complaints handling.



The second tier is comprised of more detailed operational policy documents relating to a particular aspect of complaints handling within CSD. These are more detailed policy documents describing CSD's approach to things like how complaints will be handled, unreasonable conduct or technical documents such as a detailed dictionary of terms.



The third tier comprises the associated procedures within CSD to apply the policy outlined in the first two tiers. These sit under the broader policy to ensure consistency and fairness across all parts of the complaints handling process. **This document is a third-tier document.**

### 3. Purpose

The objective of this procedural document is to establish the appropriate actions to be taken by CSD staff when handling and managing unreasonable conduct by a complainant, service user or member of the public. This procedure aligns with the *CSD Complaints Handling Charter*, the *Tier-1 Complaint Handling and Management Policy*, and the *Tier-2 Managing Unreasonable Conduct Policy* of this CHaMP policy suite.

CSD has zero tolerance for any harm, abuse, or threats directed toward its staff and any other parties who provide services to the ACT Government or are involved in the complaint handling process.

This procedure provides CSD staff with strategies and scripted responses to support them in their management of the complexities of unreasonable conduct.

### 4. Scope

This procedure applies to all CSD staff, whether by way of appointment, secondment, contract, ongoing, casual, temporary assignment, volunteer or on a fee-for-service basis and to associated organisations and service providers.

The procedure covers unreasonable conduct and behaviour of a service user, a complainant or other member of the public, whether the behaviour be exhibited in person, over the telephone, in writing, electronically (e.g., by email, social media or via submissions to CSD's Website), or a combination of these. The behaviour may occur on one occasion or over a period.

### 5. Handling Unreasonable Conduct

Unreasonable conduct is any behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for people involved. CSD is committed to protecting its staff in managing unreasonable conduct. CSD values the human rights of the service user, complainant, and member of the public. In the process of handling unreasonable conduct, individual's access to entitled public services should be undisrupted and their engagement with the Directorate should be fair and just. CSD expects employees at all levels to be committed to effective and efficient management of unreasonable conduct.

There may be instances where the unreasonable conduct is a threat of violence against a CSD staff member (s). In these instances, where the potential threat of use of violence is real by an individual towards CSD staff, consideration of a Workplace Protection Order (WPO) may be a more effective option.

Effective handling of unreasonable conduct is reliant on how well it is recognised, assessed, responded to, and recorded. It is also reliant on how equipped and supported staff are to develop and implement strategies to reduce or respond to unreasonable conduct. Specifically, handling unreasonable conduct entails all or part of the following steps.

Step 1 Preparation

Step 2 Identifying warning signs

Step 3 Assessing

Step 4 Addressing Unreasonable Conduct

Step 5 Senior Officer's Review

Step 6 1<sup>st</sup> Escalation (communication plan)

## Step 7 Division Review

Step 8 2<sup>nd</sup> Escalation (communication protocol)

## Step 9 Regulation, Assurance and Quality (RAQ) Review

This section will describe roles, actions, and responsibilities required at each of the nine steps. Strategies and resources are provided to support staff in their actions of handling unreasonable conduct.

### Step 1 Preparation

This step applies if you have been in contact with an individual who has made you feel uncomfortable or believe has been unreasonable. It is important to understand if there has been previous involvement with the individual including an unreasonable conduct on record. Read the case file carefully and see whether there is an active or deactivated unreasonable conduct on record. (If this is not the case, move to Step 2).

A case with an active unreasonable conduct on record	Identify which step this case is at in handling the unreasonable conduct according to this procedure and move directly to this step.
A case with a deactivated unreasonable conduct on record	Familiarise yourself with the strategies documented to have successfully handled the unreasonable conduct.

### Step 2 Identifying early signs

Early signs of unreasonable conduct can be identified in face-to-face or phone interactions with individuals, or in written forms of correspondence. Identifying warning signs should not cause CSD staff to be disrespectful, unfair or to bias against an individual. Think strategically by separating the person's conduct from the issues they have raised and remain positive and open-minded.

Any identification of warning signs and strategies applied to address the issue (whether successfully or not) need to be properly recorded in the case file. This is important for the handling of the case as well as for systematic improvement of CSD services. Importantly, warning signs identified at Step 2 alone do not suffice to flag unreasonable conduct without going through Step 3 Assessing and Step 4 Flagging unreasonable conduct.

If you are in a face-to-face or telephone conversation, early signs of unreasonable conduct can be identified if you:

Feel uncomfortable	feeling stressed, anxious, or threatened.
Identify scenarios where the individual	<p>makes excessive numbers/volumes of telephone calls or in-person visits.</p> <p>refuses to accept CSD's decision based solely on the fact it was not in the individual's favour.</p> <p>issues instructions and makes demands.</p> <p>insists on talking to a senior staff personally when it is not appropriate or warranted.</p>

	<p>insists on outcomes which are not possible or appropriate in the circumstances – e.g., for someone to be sacked or prosecuted, an apology and/or compensation when there is no reasonable basis for expecting this.</p> <p>refuses to follow or accept CSD's instructions, suggestions, or advice without a clear or justifiable reason for doing so.</p> <p>argues frequently and/or with extreme intensity about a particular solution they consider to be the correct one in the face of valid contrary arguments and explanations.</p> <p>expresses irrational claims/beliefs/conspiracy theories.</p> <p>makes baseless attacks on the intentions, motivations, ethics or conduct of CSD staff.</p>
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In real-time interactions, use the follow the strategies below to accomplish the original purpose of the interaction or to end the interaction.

- Check communication style:

Has the individual specific communication needs.

Ensure you are communicating effectively and respectfully, within your capability, to bring about a different response and to prevent a situation from escalating.

- De-escalate:

Use de-escalation strategies to calm the individual.

Tell the individual respectfully and decisively you will end the conversation.

- End the conversation if the situation persists

If the situation persists after the de-escalation strategy has been applied, politely reschedule the appointment, and end the conversation.

Under circumstances of threats, hostility, and aggression, end the conversation immediately to ensure your own safety. If necessary, try to follow up the business with the individual within two business days.

- Record the situation and include the following information:

- Background info: the individual's name(s), staff name(s), Location/form of interaction, any person present and their relationship to the individual, start and finish time of interaction.
- Summary of business being handled (questions asked, advice given, agreed outcomes).
- Observation of conduct (specific details or any threats or abusive words).
- Any cultural styles or strategies applied: what worked and what did not work to de-escalate the situation.

- Any other relevant information
- Record the situation for future reference.

If you are in an email or mail correspondence, early signs of unreasonable conduct can be identified if you encounter one or more of these scenarios where the individual demonstrates:

unreasonable persistence	<p>makes excessive numbers/volumes of emails, letters, and supplying excessive volumes of paperwork.</p> <p>refuses to accept the outcome based solely on the fact it was not in the complainant's favour and engaging a member of CSD staff in an ongoing dialogue to have the decision changed.</p> <p>reframes a case to have it considered again.</p> <p>contacts different people within CSD and/or externally to get a different outcome or more sympathetic response.</p>
unreasonable demands	<p>issues instructions and making demands about how CSD should handle the case, the priority it should give, or the desired outcome.</p> <p>demands more reviews than provided for in the review policy of CSD, and/ or demands a different outcome without demonstrating the original one was wrong.</p> <p>insists on outcomes which are not possible or appropriate in the circumstances – e.g., for someone to be sacked or prosecuted, an apology and/or compensation when no reasonable basis for expecting this or</p> <p>demands services of a nature or scale which CSD cannot provide.</p>
a lack of cooperation	<p>sends a constant stream of comprehensive and/or disorganised information without clearly defining any issues or explaining how they relate to the case.</p> <p>provides little or no detail, or presents only small bits of information, not all the information.</p> <p>refuses to follow or accept CSD's instructions, suggestions, or advice without a clear or justifiable reason for doing so.</p> <p>argues frequently and/or with extreme intensity about a particular solution they</p>

	<p>consider to be the correct one in the face of valid contrary arguments and explanations.</p> <p>displays unhelpful behaviour – such as withholding information, acting dishonestly or misquoting others.</p>
unreasonable disagreement	<p>expresses irrational claims/beliefs/conspiracy theories</p> <p>Disagree which cause distress, detriment or harassment to CSD or any of its staff member.</p> <p>denies responsibility for action or inaction when it would be considered reasonable to do so.</p> <p>Frequently disagrees which fails to follow a reasonable sequence.</p> <p>makes false, inflammatory or defamatory statements.</p>

When identifying early signs of unreasonable conduct in the written forms of correspondence, you need to:

- Record the situation:
  - Background info: the individual's name(s) staff name(s), Location/form of interaction, any person present and their relationship to the individual, start and finish time of interaction
  - Summary of business being handled (questions asked, advice given, agreed outcomes)
  - Observation of conduct (specific details or any threats or abusive words)
  - Any cultural styles change or strategies applied: what worked and what did not work to de-escalate the situation
  - Any other relevant information
- Decide:
  - to apply de-escalating strategies, or
  - to flag the unreasonable conduct, continue to Step 3

Send a notification to the individual of a new timeframe for reply if the potential handling of unreasonable conduct is likely to cause any delay to the business handling



### Step 3 Assessing

This step undertakes a holistic assessment of the situation and provides evidence for the decision-making process at Step 4.

Check the individual's personal situation	<ul style="list-style-type: none"> <li>• Cultural background</li> <li>• Identified disability</li> <li>• History of trauma</li> <li>• Mental health considerations</li> <li>• The individual's history with CSD</li> </ul>
Articulate the trigger point	<ul style="list-style-type: none"> <li>• Aggression, harassing or abusive words, or actions of threats, violence, or assault.</li> <li>• Inappropriate conduct significantly reducing the efficiency of business handling. <ul style="list-style-type: none"> <li>- disrespectful behaviours,</li> <li>- lack of cooperation, or</li> <li>- no evidence of meeting the requirements of the intended purpose of engagement (e.g., complaint process, information request etc) when the individual has the health, intellectual, linguistic, financial, and social resources needed to do so</li> </ul> </li> <li>• Proportionality: <ul style="list-style-type: none"> <li>- The individual's behaviour/reaction is not proportionate when compared to the matter they have raised</li> <li>- The individual's demands on time and resources are not proportionate to the seriousness of their issue</li> </ul> </li> <li>• The individual's responsiveness: <ul style="list-style-type: none"> <li>- Inappropriate behaviours persisted or increased despite your advice</li> </ul> </li> <li>• Personal boundaries:</li> <li>• You feel stressed, anxious, threatened, or otherwise uncomfortable during the interactions with the individual. And the feeling persists after respectful communication from your part.</li> <li>• Other circumstances not mentioned above</li> </ul>
Assess risk	Assess the extent to which the conduct will expose CSD, business units, staff or any other parties involved to risks by an individual who displays unreasonable conduct

Assess resources	Assess whether the conduct will demand an excessive amount of CSD's resources and how much resources can be used in handling the unreasonable conduct without compromising the quality of services CSD provides.
Decide	<p>Decide whether to:</p> <ul style="list-style-type: none"> <li>• Only Record the unreasonable conduct for future reference</li> <li>• Document the unreasonable conduct and decide on an engagement strategy, go to Step 4</li> <li>• Document unreasonable conduct, form a communication plan, go to Step 6</li> <li>• Document unreasonable conduct, form a communication protocol, go to Step 8</li> </ul>

### Step 4 Addressing Unreasonable Conduct

This step involves developing strategies to support an individual's engagement with CSD.

Categorise unreasonable conduct	<p>Once identified as unreasonable, it is important to determine the category the conduct falls into to best determine how to effectively handle the circumstances.</p> <p>The five broad categories given by the Tier-2 Unreasonable Conduct Policy include:</p> <ul style="list-style-type: none"> <li>• Unreasonable persistence</li> <li>• Unreasonable demands</li> <li>• Unreasonable lack of cooperation</li> <li>• Unreasonable arguments</li> <li>• Unreasonable behaviour</li> </ul>
Develop an engagement strategy	<p>Think holistically before getting into details of strategy selection. Consider the following factors:</p> <ul style="list-style-type: none"> <li>• Likely level of impact of conduct on staff, other client, and service delivery according to the risk level and the resources availability</li> <li>• History of individual's interactions with CSD</li> <li>• History of success – what methods have already been used</li> <li>• Personal thresholds and skill level of the staff involved</li> <li>• Organisation policy, procedures, and protocol</li> </ul>

	<p>Select a strategy or a combination of strategies based on the unreasonable conduct category or categories. Refer to Managing Unreasonable Conduct by A Complainant (NSW Ombudsman, 2021) :</p> <p><a href="https://www.ombo.nsw.gov.au/_data/assets/pdf_file/0008/125756/Managing-unreasonable-conduct-by-a-complainant-manual.pdf">https://www.ombo.nsw.gov.au/_data/assets/pdf_file/0008/125756/Managing-unreasonable-conduct-by-a-complainant-manual.pdf</a></p> <ul style="list-style-type: none"> <li>• unreasonable persistence strategies (pp.21-6)</li> <li>• scripted responses (pp. 27-31)</li> <li>• unreasonable demands strategies (pp. 32-7)</li> <li>• scripted responses (pp. 38-45)</li> <li>• unreasonable lack of cooperation strategies (pp. 46-48)</li> <li>• scripted responses (pp. 49-51)</li> <li>• unreasonable arguments strategies (pp. 52-4)</li> <li>• scripted responses (pp. 55-9)</li> <li>• unreasonable behaviours strategies (pp. 60-9)</li> <li>• scripted responses (pp. 70-2)</li> </ul>
Senior officer to approve the engagement strategy	<p>Check there is not any restrictive element in the engagement strategy.</p> <p>Set up the timeframe for review.</p> <p>Send a formal letter to the individual with a Rights and Responsibilities Sheet.</p>
Implement the engagement strategy	<p>Implement the engagement strategy in the interaction/correspondence with the individual.</p> <p>Monitor the situation and keep a record of what worked and what did not work.</p>
Immediate Escalation if needed	<p>If the situation escalates to pose immediate risk to you, the individual, CSD, or any other parties, discuss with the senior officer and go to Step 6 to escalate.</p>
Seek advice from RAQ if needed	

### Step 5 Senior Officer Review

Review	Senior officer reviews the case record thoroughly:
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	<p>1) whether the handling officer has properly implemented engagement strategies</p> <p>2) whether the situation is manageable, improved, or should be escalated</p>
Invite Individuals opinion/input	Senior officer notifies the individual of this review and invites their input via email or phone. Organise a phone call or face-to-face meeting if required by the individual.
Make a decision	<p>Review outcomes:</p> <p>1) Maintain the unreasonable conduct strategies with renewed engagement strategies and set a timeframe for next review.</p> <p>2) Escalate to communication plan. Go to Step 6.</p> <p>3) Deactivate the unreasonable conduct engagement strategies. No further review needed.</p>

### Step 6 1st Escalation (Communication plan)

A communication plan establishes how CSD staff will effectively communicate with individuals displaying unreasonable conduct without restricting their contact with CSD. It is a voluntary agreement between the individual and the business division involved.

Initiate an escalation	<p>Immediate risks can be identified at the stage of assessing the situation, implementing the engagement strategies, and the review. Under such circumstances, the handling officer and the senior officer should apply for escalation (decision tree as a tool of decision-making).</p> <p>In conversations with a senior officer determine if a communication plan will be beneficial to all parties involved.</p> <p>Submit detailed evidence for escalation, and rationale for a communication plan to senior director or equivalent for approval.</p>
Senior officer (with assistance from handling officer) to draft communication plan in consultation with the individual.	<p>Draft the communication plan.</p> <p>Notify the individual of the process. The Senior officer to contact the individual (phone, mail, email) and arrange the meeting (the individual is regarded as</p>

	<p>waiving the right to participate in drafting communication plan if no response after 3 attempts using at least 2 contact methods)</p> <p>Consultation meeting with the individual (in-person, or via phone). The meeting will be recorded. The meeting will discuss:</p> <ul style="list-style-type: none"> <li>• rights and responsibilities of all parties involved.</li> <li>• purpose and proposed benefit of the communication plan</li> <li>• methods of streamlining the exchange of information</li> <li>• Specific contact point</li> </ul> <p>Communicate the plan through the relevant Division (and other Divisions as needed) and revise the plan if needed.</p> <p>Submit the communication plan to division senior director or equivalent.</p>
Senior director or equivalent to review the communication plan	<p>Evaluate whether the individual's opinion is well considered and properly incorporated.</p> <p>If any major revision needed, send the communication plan back to the senior officer and ask for resubmission within an agreed timeframe.</p> <p>Articulate the timeframe for review upon approving the communication plan.</p> <p>Notify the individual of the approved communication plan and the way of making inquiries.</p>
Division implements the communication plan	<p>Handling officer to keep a record of implementing the communication.</p> <p>Monitor the situation and keep a record of what worked and what did not work.</p> <p>Notifying relevant parties about comms plan. E.g., other Divisions, Ministers Office.</p>
Immediate Escalation if needed	<p>If the situation escalates to pose immediate risk to you, the individual, CSD, or any other parties, discuss with the division senior director or equivalent and go to Step 8 to escalate.</p>

## Step 7 Division Review

Review	<p>Division senior director or equivalent reviews the case record thoroughly:</p> <ol style="list-style-type: none"> <li>1) whether the handling officer and other division staff members have properly implemented the communication plan</li> <li>2) whether the situation is manageable, improved, or should be escalated</li> </ol>
Invite Individuals opinion/input	<p>Division senior director or equivalent notifies the individual of this review and invites their input via email or phone. Organise a phone call or face-to-face meeting if required by the individual.</p>
Make a decision	<p>Review outcomes:</p> <ol style="list-style-type: none"> <li>1) Maintain the communication plan with renewed engagement strategies and set the timeframe for next review</li> <li>2) investigate escalation to communication protocol. Go to Step 8</li> <li>3) Deactivate the case and exit the unreasonable conduct handling procedure</li> </ol>

### Step 8 2nd Escalation (Communication Protocol)

A communication protocol is a plan which in some way restricts an individual's contact with CSD. Any consideration to restrict an individual's contact with CSD needs to be discussed with and requested through the Executive Branch Manager of RAQ.

<p>Initiate an escalation:</p> <p>Handling officer to submit an escalation application for communication protocol to senior officer</p>	<p>Severe risks can be identified at the stage of assessing the situation, implementing the engagement strategies or communication plan, and during the review. Under such circumstances, the handling officer should apply for communication protocol (decision tree as a tool of decision-making).</p> <p>Submit detailed brief with supporting evidence for escalation, and rationale for a communication protocol to division senior director or equivalent for approval. Guidance evidence is required.</p>
<p>Senior officer (or with the handling officer) to draft communication protocol</p>	<p>Any consideration to restrict an individual's contact with CSD needs to be discussed with and requested through RAQ:</p> <p>Explain the necessity of a communication protocol through a thorough review of the case. Contact RAQ to discuss the</p>

	<p>unreasonable conduct and the rational for a communication protocol.</p> <p>Describe the elements of the communication protocol to be enacted including:</p> <ul style="list-style-type: none"> <li>• The proposed restrictions</li> <li>• The proposed communication methods (and frequency)</li> <li>• The period until review</li> </ul>
The EBM of RAQ to pre-approve the communication protocol	<p>The EBM RAQ will consider:</p> <ul style="list-style-type: none"> <li>• If a communication plan will be beneficial to all parties involved</li> <li>• If the evidence is sufficient</li> <li>• If the restrictive element is necessary and appropriate</li> <li>• If any major revision needed, send the communication protocol back to the senior officer and ask for resubmission within an agreed timeframe</li> </ul> <p>Articulates the timeframe and process upon the approval of the communication protocol.</p> <p>Keeps the decision-making process on record.</p> <p>Notifies relevant business areas of the approved communication protocol.</p>
Division to send out the warning letter and proceed to implement the communication protocol if needed.	<p>Senior director or equivalent to send a warning letter to the individual, advising the communication protocol will be implemented if the situation persists or not improved.</p> <p>Division can decide to implement the communication protocol pre-approved by EBM of RAQ. Send a notification to RAQ for reference.</p> <p>Senior director or equivalent to send a notification letter to the individual upon the implementation of the communication protocol. The individual should be advised of the approved communication protocol, the way of making inquiries, and the timeframe for expected responses to inquiries.</p> <p>Handling officer to keep a record of implementing the communication protocol in interaction/correspondence.</p>

### Step 9 RAQ Review

Division to review	Division senior director or equivalent reviews the case record thoroughly:  1) whether the handling officer and other division staff members have properly implemented the communication protocol.  2) whether the restrictive element is necessary and effective
Division to invite the individual's opinion/input	Division senior director or equivalent notifies the individual of this review and invites their input via email or phone. Organise a phone call or face-to-face meeting if required by the individual.
Division to make a recommendation	Review outcomes:  1) Maintain the communication protocol with renewed restrictive element and set the timeframe for next review  2) De-escalate to communication plan with a timeframe for next review
RAQ to decide whether to support the review result	Division submits relevant records, review materials, and recommendation to RAQ.  EBM of RAQ decides whether to support the review result or any further review process needed.

## 6. Reporting

Every CSD staff member handling unreasonable conduct is encouraged to report regularly to a senior officer. When a communication plan or a communication protocol is active, its implementation needs to be reported in the written form to division senior director or equivalent regularly. The report should focus on what has worked or not worked, and the upholding of natural justice and procedural fairness in the process.

Every division needs to update the number of communication plans, and communication protocols in place, in a timely way. Divisions will send an unreasonable conduct handling report to RAQ annually and provide detailed written reports of a particular case upon RAQ's request. Complicated cases are to be presented at CSDCMC subcommittee meetings by division representatives for a discussion of handling and de-escalation strategies.

## 7. Training

- Regular training on unreasonable conduct handling entails introductory and refreshment modules via HRIMS Learning system.
- The training modules are updated annually by incorporating evidence and learnings from divisions' unreasonable conduct handling reports.
- Specific training sessions can be arranged by RAQ upon divisions' request.



## 8. Related Policies

- *T1. Complaints Handling and Management Policy: Authorising Charter*
- *T1. Complaints Handling and Management Policy (CHaMP)*
- *T2. Complaints Handling and Management Policy: How a complaint will be handled*
- *T2. Complaints Handling and Management Policy: Unreasonable conduct*
- *T3. Complaints Handling and Management Procedure*

## 9. Document information

<b>Authorising officer:</b>	Director General, Community Services Directorate
<b>Effective date:</b>	11 October 2022
<b>Last reviewed:</b>	7 June 2023
<b>Next review date:</b>	Interim, 12 months from authorisation Full review, 24 months from authorisation
<b>Access:</b>	Open access – Available to all staff and the public

## 10. Version history

The following table details the published date and amendment details for this document.

Date	Amendment details
July 2022	Procedure drafted
17/08/2022	Review by Senior Director, Regulation, Assurance and Quality
13/11/2022	Moderated by members of the CSDDMC
11/10/2022	Final moderation and endorsement by CSDDMC
07/06/2023	Reviewed for grammatical errors and linkages to sources

## 9 Appendix 1 Early Warning Sign Record Form

Complainant(s) name(s) Staff name(s) Location/form of interaction Any person present, and relationship to the complainant(s) Start and finish time of interaction Summary of issues discussed (questions asked, advice given, agreed outcomes) Observation of conduct (specific details or any threats or abusive words) Any other relevant details	
Staff name(s)	
location of interaction	
Any person present, and relationship to the complainant(s)	
Start, finish time of interaction	
Summary of issues discussed (questions asked, advice given, agreed outcomes)	
Observation of conduct (specific details or any threats or abusive words)	

Any other relevant details	
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