



NATIONAL
COUNSELLING &
PSYCHOTHERAPY
SOCIETY

INAPPROPRIATE COMMUNICATION POLICY



INTRODUCTION

We are committed to providing excellent service in all interactions with our members and the public, although we recognise that sometimes we may get things wrong or are unable to help members or the public in the way they would like.

We treat any expressions of dissatisfaction seriously and value feedback from our members and the public which may help us identify learning points and improve our services. We have a process in place to handle complaints about the wide range of services we provide.

Most people contacting the Society communicate appropriately, reasonably and professionally.

Unfortunately, on occasion, we receive inappropriate communications. These not only can impact the mental health or wellbeing of our team, to whom we have a duty of care; but can also take up disproportionate time and energy that we would like to dedicate to people who communicate with us appropriately.

This policy explains our approach to recognising and handling contacts where communication is inappropriate. It applies to all points of contact with the NCPS, whether member, trainer, organisation, or the general public, either directly or indirectly (for example, ranging from a direct phone call to a post on social media.)

We will ensure that we meet the requirements of the Equality Act 2010 to make 'reasonable adjustments' for our members, or members of the public with protected characteristics (e.g., those with disabilities). In some circumstances, members and the public may have a disability that makes it difficult for them to either express themselves or communicate clearly and/or appropriately. Where there is an indication that this may be the case, we will consider the needs and circumstances of the person contacting us before deciding on how best to manage the situation.

COMMUNICATING WITH THE NCPS

There may be occasions where an individual's (or organisation's) communication behaviour puts the well-being of the NCPS's team at risk. Inappropriate communication could occur in any interaction with any member of our team (over the phone, in person or in writing including emails and letters), and not just in the context of a complaint process.

The NCPS deals with issues that impact the lives of members of the public and the therapeutic professions. We recognise that people will often express themselves strongly and communicate the emotions they are experiencing at the time. We also realise that the matters that people complain about can be set against a background that is distressing. For example, issues relating to bereavement, their mental health, or the potential impact of a decision about them on their livelihood and career. We will not view the behaviour of anyone using our services or contacting us as inappropriate simply because they disagree with us on an issue. Our team are trained to handle interactions with our members and the public appropriately and are expected to make reasonable allowance for anyone wishing to complain or express dissatisfaction or concern.



WHAT IS INAPPROPRIATE COMMUNICATION?

On occasion, however, the behaviour of our members and the public may go beyond what is reasonably acceptable. Examples of such inappropriate communication may include (but is not limited to):

- Threats, whether major (such as a threat of violence) or minor (such as “do what I say or I will trash you online”.)
- Verbal abuse
- Rudeness
- Bullying
- Derogatory or insulting personal remarks
- Inappropriate pressure for an outcome e.g. “respond within one day or else”
- Inappropriate pressure via repeated contact e.g. “I will email you every day until you respond”
- Harassment based on their personal characteristics e.g., racist, sexist or homophobic behaviour
- Obscene remarks
- Making inflammatory statements e.g., ‘You are incompetent and should be sacked’
- Unsubstantiated accusations of corruption e.g. “this process is rigged”.
- Recording of calls and/or meetings; or sharing our communications online without our written consent
- Leaving a negative review during a complaints process which may prejudice the process
- Derogatory, libellous, abusive, or insulting comments made about the NCPS team, or the NCPS itself, online or in the media
- Harassing, abusing, or threatening staff on their personal social networks
- Physical intimidation or aggression

Some of the behaviours outlined are unlawful and where this is the case we will contact the Police.

OUR DUTY TO OUR TEAM

These situations are not common, but when they do happen, we will take action to restrict or end our communication and access to our team and offices. We do this because our team must be able to carry out their work without harassment and it is our expectation that they should be treated respectfully and with courtesy - in the same way that we expect them to interact with our members and the public.

VIOLENCE

We have a duty to protect our team and to be mindful of their welfare and safety. We take any threat of violence seriously and will bring any direct contact with the perpetrator to an end. We will also report such threats to the Police. We consider violence to include any communication or behaviour that may cause a member of staff to feel afraid, threatened or abused.



DECIDING IF A COMMUNICATION IS INAPPROPRIATE

If a team member believes that a communication is inappropriate, they must bring it to the attention of either their line manager or a dedicated Society Officer. The communication will be investigated and an appropriate course of action decided.

If, however, a team member encounters inappropriate communication during a live telephone call or live online video call/meeting, they are entitled to bring the call or meeting to an end immediately and without notice. They may, at their discretion, before terminating communication, raise the issue that there has been inappropriate communication and continue with the communication if they feel it is safe and appropriate to do so.

Similarly, a team member who encounters such behaviour in a face to face, in person meeting is entitled to bring the meeting to a close using their personal judgement as to whether it is appropriate to request that a more appropriate approach be adopted first.

If inappropriate communication occurs at an event, the staff member may apply the same discretion and notify the event organiser or appropriate person who may be able to help diffuse the situation. They may also leave the event without notice if they deem this is the appropriate course of action.

We expect our team to be mindful at all times of their own personal safety in exercising this discretion.

In all cases where a team member has had to take action to deal with unreasonable behaviour or inappropriate communication, a record of the circumstances should be made, and the situation brought to the attention of their manager or appropriate designated Society Officer.

ACTIONS WE MAY TAKE

Where a decision has been made that inappropriate communication has occurred, the Society will notify the contact of this fact and of the actions we may take.

WARNING

A first step action may be to warn the person contacting us that future communications with us will be restricted or discontinued if the inappropriate communication continues.

RESTRICTING OR DISCONTINUING COMMUNICATION

The Society may, however, consider immediately and without notice discontinuing or restricting contact as considered appropriate. We will clearly communicate this to the person in a manner we deem appropriate to the circumstances.

RECONSIDERING AFTER AN APOLOGY OR UNDERTAKING

We may reconsider our actions if someone offers an apology and/or undertaking not to repeat the inappropriate communication.

DECISION POWERS

A decision to restrict or discontinue contact can be made by the line manager of the team member raising the issue or by a designated Society Officer at our sole discretion.

EXAMPLES OF RESTRICTIONS

There are a range of options available to us, depending on the circumstances and the type of behaviour. Examples include, but are not limited to:

- Requiring the complainant to contact a named team member only;
- Restricting telephone calls to specified days and times.
- Restricting or terminating contact where we are repeatedly asked to re-engage with an issue where we have already made a determination, answered in full or considered the matter closed.
- Terminating telephone calls and blocking numbers due to aggressive or threatening communications.
- Restricting the issues we will correspond on.
- Returning large volumes of irrelevant documents or destroying them in extreme cases.
- We will block emails if the number and length of emails sent is considered unreasonable; for example, persistent harassment.
- We will not respond to correspondence which is abusive or offensive and we will block emails that are abusive or offensive;
- If a complainant makes a large number of reports to us which prove to be unfounded, we may ask that in future any further allegations are supported by an independent third party such as the Citizens Advice Bureau, a legal representative or an advocate, to ensure that in future our team resources are used appropriately. We may also decline to receive future complaints from that complainant.

IMPACT ON COMPLAINTS: VOIDING A COMPLAINT.

Where a complainant, whether complaining about a member, training provider, organisational member; team member or policy issue, communicates inappropriately we may at our discretion terminate communication and void the complaint. Where we void a complaint relevant to individual registration due to inappropriate communication, our decision will be submitted to the Society's Independent Assessor for annual review in order to safeguard the integrity of our Accredited Register.

IMPACT ON COMPLAINING ABOUT A TEAM MEMBER: INTERNAL PROCESS

Where our inappropriate communication policy has been activated, and there is either a pre-existing complaint made about a team member; or one is raised subsequently, the Society will use its internal HR processes to handle the team member complaint in line with appropriate Employment Law. We may not communicate with or update the complainant about this at our discretion.

INAPPROPRIATE COMMUNICATION FROM MEMBERS

We hold members to a high standard of professionalism regarding their communications in line with their status as members of the Society and their obligations under our Code of Ethics.

Inappropriate communication from members is a breach of the Terms and Conditions of Membership and so can lead in serious cases to the termination of membership.

“Members” means individual members, training providers and organisational members.

IMMEDIATE TERMINATION

In extremely serious cases where a member communicates with (or about) the NCPS in a manner deemed inappropriate enough to warrant immediate termination of membership, a decision may be made to terminate such membership immediately.

In cases of immediate termination of a Registrant, the member will be allowed to remain on the Register for up to three months, after which they will be removed from registration and membership and given a pro rata refund of their fees. Non registrant members will be removed without notice.

MEMBERS ON RESTRICTIONS OR DISCONTINUATIONS

Once a decision to restrict or discontinue communication has been made regarding a member, further inappropriate communication will lead to termination of membership as above.

Where a decision has been made to discontinue or restrict communication, if the recipient of this decision is a member of the NCPS, they may also be offered a refund of their last fees paid in return for termination of membership by mutual agreement.

DECISION POWERS FOR MEMBERS

A decision to restrict or discontinue contact; or to offer termination by mutual agreement, can be made by the line manager of the team member raising the issue or by a designated Society Officer at our sole discretion.

A decision to terminate membership will be made by the Society’s Registrar.

REVIEW

A member subject to restriction or discontinuation of communication may appeal to a designated Review Manager whose decision shall be final. A request for review must be lodged within 7 days. Restrictions will remain in place during the review.

A member whose membership is terminated for inappropriate communication may ask for a review by an Inappropriate Communication Assessment Panel (ICAP) consisting of a Chair and two Panel Members, within 7 days receipt of their notice of termination. The decision of such a panel shall be final. Termination of membership shall not come into effect while a decision is under review.

RECORDS

We will maintain a register of the restrictions applied, which will be regularly reviewed to ensure that it remains relevant and up-to-date.

We will maintain records of membership terminations under this policy which will be assessed by the Society’s Independent Assessor.



If you have any questions please do not hesitate
to contact our team



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