

# PIRC Service Standards

## November 2025

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## 1. Introduction & Aims

We are committed to treating everyone with dignity, fairness and respect, to positive communication and to providing a high-quality service for members of the public.

These standards set out the steps we will take to support people, as well as the standards of correspondence we expect of our staff and from members of the public.

We take a zero tolerance approach to any form of abuse of our staff and these standards outline the steps that we can and will take to protect them.

## 2. Application

These standards apply to anyone who corresponds with us in any way including, but not limited to:

- members of the public;
- policing bodies operating in Scotland;
- contractors;
- partner organisations;
- individuals/organisations providing support to members of the public; and
- elected or legal representatives.

Communication includes all forms of contact such as:

- verbal (over the phone, in person, etc.)
- written (letters, emails, online forms, etc.)
- online content shared publicly even when not shared directly with PIRC; and
- any face to face contact, whether that is in the course of an Investigation/Review, or at external engagement events.

## 3. What Individuals/Organisations Can Expect From Us

We have set timescales within which we need to acknowledge correspondence that we receive. These depend on the type of correspondence and the reason for contacting us.

### Corporate Services

- Information Requests: four working days; and
- Complaints about PIRC: two working days.

### General

- Emails to [enquiries@pirc.gov.scot](mailto:enquiries@pirc.gov.scot): automatically acknowledged;
- CHR applications via email or our website: automatically acknowledged;
- CHR applications by post: five working days;
- Initial contact of any other type/reason: two working days; and
- Subsequent contact of any other type/reason: four working days.

#### 4. Reasonable Adjustments and Specific Support Needs

People who need to access our services should be supported to do so in a way that meets their needs. This could be over the phone, electronically, by post or in person. We encourage individuals to tell us if there are any specific ways we can support them in their interaction with us.

Specific support needs can be related to / arise from, but are not limited to:

- age;
- trauma, either recent or historic;
- learning difficulties;
- physical disabilities or other health issues;
- mental health conditions;
- living/social circumstances;
- digital exclusion;
- employment status; or
- involvement in the justice system.

We ask that individuals give us specific details of any adjustments that would help them access our service, including how the requested adjustment will allow them to communicate with us as constructively as possible. Where requests are reasonable and something that we can provide, then we will make every effort to accommodate them. For example, we may be able to:

- deal with a nominated representative;
- provide correspondence in large text or other languages/formats;
- print correspondence on coloured paper;
- discuss a case over the phone or via email;
- arrange supported meetings using MS Teams; or
- provide audio recorded copies of correspondence.

If we cannot accommodate a specific request, we will try and signpost to other organisations with the relevant expertise who can offer the required support. If you would benefit from additional support, you can find details of organisations that may be able to help on our [Support contacts and advocacy webpage](#).

#### 5. Identifying and Managing Challenging Communication

We understand that people may act out of character during stressful situations and we will always strive to support them – however this must be balanced against their and our staff's health, safety and wellbeing.

It is impossible to provide a comprehensive list of actions that we would consider difficult or challenging. We have identified five general groups of interactions which we could consider unacceptable:

- behaviours;
- demands;
- fixation / persistence;

- lack of cooperation; and
- unreasonable arguments.

**Behaviours:** derogatory remarks; rudeness; swearing; verbal abuse or hostility; inflammatory statements; unsubstantiated allegations; recording interactions without prior consent; manipulative or ‘blackmailing’ statements; providing fictitious or manufactured correspondence or evidence; making threats to self, others or property; any attempts to discuss staff members’ personal lives; asking inappropriate questions of staff; any attempts to contact staff out of hours; any harassing or ‘stalking’ behaviours, including through social media; posting audio or visual recordings of PIRC staff on social media / websites without prior consent; threatening to attend PIRC premises uninvited, or refusing to leave the premises when asked; and any threats, or forms, of physical violence.

**Demands:** about how a complaint or investigation should be handled; that we respond to trivial or irrelevant aspects of a matter under consideration; that we deal with issues that are not within our remit; for responses within an unreasonable timescale; to see or speak to a particular member of staff; that issues already addressed are looked at again; that we disclose information we are not permitted to; for unattainable or unrealistic outcomes; and for a review of our decision.

**Fixation / persistence:** unduly frequent or excessively long phone calls, emails or letters; repeatedly challenging the substance of an issue or raising unrelated concerns; attempts to contact different people in our organisation in the hope of a different outcome; refusing to accept a final outcome; repeatedly raising the same issues, despite having received a final response; repeatedly copying us into communications with multiple other agencies; repeatedly raising minor or technical procedural issues and arguing that these call into question the merits of our decision; and repeatedly questioning the competency or integrity of the PIRC or our staff.

**Lack of cooperation:** repeatedly deliberately failing to clearly define an issue or complaint; failing to reply to repeated requests for information; providing excessive amounts of irrelevant information despite requests not to do so; failing to cooperate with arrangements made to meet requests for reasonable adjustments; withholding information that is material to the process/determination; and deliberately providing inaccurate or misleading information, or acting dishonestly in any other way which materially affects our ability to carry out our statutory function.

**Unreasonable arguments:** insisting on the importance of an issue that is clearly trivial; making spurious or groundless allegations on the basis of little or no supporting evidence; insisting that an erroneous interpretation of the facts or of the law is correct; and groundlessly alleging corruption or conspiracy on the part of the PIRC, our staff, or other agencies.

In such cases our staff will:

- provide the individual with an opportunity to modify their behaviour; and
- provide the individual with a warning that formal action may be taken.

We will still take account of any special requirements and/or reasonable adjustments that may be required, but these will not dictate the way this correspondence is managed.

Proposals to restrict an individual's communication with us will be made by a senior team member, which will then be passed to the appropriate Head of Department or the Director of Operations for approval.

Where we deem it necessary to actively manage an individual's communication, we will:

- advise them of our decision in writing;
- advise them of their right to appeal and how the appeal process works; and
- review any decision after 12 months, advising the individual of the outcome, unless there are exceptional circumstances which justify not doing so.

In general terms, if an individual has been given an opportunity to modify their behaviour and has failed to do so we will take action under this policy to restrict their contact with us. Specifically, where the behaviours displayed involve any of the following, we may take the action specified:

- **Threats of violence** – restricting the individual to remote contact and potentially reporting this to police as a crime.
- **Abusive calls** – corresponding with the individual only in writing, either via post or email, and terminating any calls to our office.
- **Fixation/persistence** – appointing the individual with a Single Point of Contact (SPOC) to agree contact arrangements i.e. specified days/times to speak, or any other contact methods deemed appropriate in the circumstances.
- **Abusive/excessive correspondence** – if correspondence remains unreasonably persistent, fixated, or contains abusive/offensive language, we may refuse to respond/acknowledge correspondence completely unless it raises significant new issues that have not already been addressed. We may further restrict contact via a representative only.

The above examples are not exhaustive.

## 6. Appeal and Review Process

Individuals have the right to appeal any decision to restrict contact with them. To do so, they should submit the reasons for their appeal to us in writing within 14 days of the restriction being imposed. The restrictions imposed will remain in place until any appeal has been considered. This will be considered by a member of senior staff that was not involved in the decision to restrict contact. Outcomes will vary, but can include: the original restriction remaining in place; amendments to the terms of the restriction; or removal of the restriction. The individual will be advised in writing of the outcome of the appeal within 14 days of the appeal being received. Where a decision on an appeal to restrict contact cannot be made within 14 days, the individual will be advised of this and provided with regular updates while the appeal is being considered.

Any decision to restrict contact will be reviewed no more than 12 months after the decision was made. A member of the Administration Team will review the list of restrictions on a monthly basis and advise the relevant member of staff that the review is due. The member of staff who proposed the restriction, or a suitable colleague in their absence, will review the terms of the restriction, taking into account factors such as any ongoing challenging correspondence during the period of the restriction. The review decision will be approved by the appropriate Head of Department or the Director of Operations. The individual will then be advised in writing of the outcome of the review, unless there are exceptional circumstances which justify not doing so. In these circumstances, the rationale for any decision not to contact the individual must be clearly documented.

## **7. Implementation, Monitoring and Review**

These standards will be reviewed annually by the policy owner. Any queries or comments should be addressed to the Head of Corporate Services.

## **8. Communication & Contacts**

These standards will be shared with all staff within PIRC and will be published for access on our intranet and website.

Queries should be addressed to:

Head of Corporate Services  
PIRC  
Hamilton House  
Hamilton Business Park  
Hamilton  
ML3 0QA

Phone: 01698 542900

Email: [enquiries@pirc.gov.scot](mailto:enquiries@pirc.gov.scot)

## **9. Benchmarks**

- PIRC Unacceptable Actions Policy
- SPSO Engagement Policy
- SPSO Complaints Handling Practice Guide – Handling Difficult Situations
- SPSO Complainants with Vulnerabilities Guidance
- IOPC Managing Unacceptable Service User Contact Policy
- GSOC Managing Unreasonable Behaviour and Contacts Policy
- PONI Customer Complaint Policy
- PONI Managing Unacceptable Contact Policy
- Police Scotland Unacceptable Actions by Complainers SOP

These standards are formal PIRC standards and will be reviewed by PIRC's Senior Leadership Team, with amendments approved by the PIRC SLT represented therein on an annual basis.

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