

EMS Policy		Version: 2.2
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Originator: AIE Lean Team		
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Approved By: OPEX Managers		
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**Unreasonable Service User
&
Stakeholder Policy**

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1.0 SCOPE

Coillte's purpose is to manage the state forests on behalf of the people of Ireland. Our mission is to balance and deliver the multiple benefits of our forests to society for climate, nature, wood and people. We welcome feedback from our service users and stakeholders about how we manage our forests for the benefit of society.

Coillte's Service User & Stakeholder Charter reflects the mutual expectations of Coillte and its service users and stakeholders and seeks to ensure that our organisation conforms to the highest principles of professional service. The Charter outlines our commitment to engagement with our service users and stakeholders. Equally, it outlines our expectation in return that people engaging with Coillte staff will be courteous, forthcoming, and respectful.

Coillte values feedback from our service users and stakeholders and is committed to dealing with all issues raised and complaints received fairly and impartially. We have robust procedures in place for dealing with all issues raised and complaints received that are subject to the requirements of our certifying bodies and relevant regulatory authorities. We are committed to ensuring that those who interact with Coillte are treated with fairness and respect.

2.0 UNREASONABLE BEHAVIOUR AND CONTACTS

Coillte acknowledges and supports the right of all its employees to work in an environment free of any type of bullying or harassment as set out in our Bullying and Harassment Policy and as defined by the Employment Equality Acts, 1998 (as amended). Coillte's Unreasonable Service User & Stakeholder Policy (the "Policy") applies to incidents of bullying and/or harassment in the workplace by any service user or stakeholder with whom an employee might reasonably expect to come into contact with, during the course of their employment.

Coillte expects staff to listen to service users and stakeholders, to treat them fairly and to respond to queries in a professional, respectful, and courteous manner. Generally, service users and stakeholders interact with us in a reasonable manner. However, we do not expect our staff to tolerate bullying, harassment or unreasonable behaviour to include but not limited to behaviour that is abusive, offensive, threatening, vexatious, or, due to the frequency of contact, accounts for a disproportionate amount of time and resources that could be spent more effectively dealing with other service user and stakeholders and/or issues.

Such behaviour and conduct may include one or two isolated incidents or may be the accumulation of incidents or behaviour over a period of time.

This type of behaviour is classified as unreasonable service user and stakeholder conduct and can comprise:

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- 2.1 Unreasonable persistence** – This can include, but is not limited to, persistent refusal to accept a decision made on a complaint or continuing to pursue an issue/complaint without presenting new information, raising further additional queries on foot of receipt of the initial answer provided, changing or reframing a closed query to present it as a new issue, insisting that another member of staff examine a matter deemed to be closed or submitting a complaint that has been raised with a regulatory and/or certification body and is still under investigation. A service user's or stakeholder's action may also be considered unreasonably persistent if all review mechanisms have been exhausted and the service user or stakeholder continues to challenge Coillte's decision relating to their complaint or issue.
- 2.2 Unreasonable demands** – this can include insisting on an investigation, which falls outside the scope of Coillte's remit or outside of our control or responsibility, demanding responses within an unreasonable timescale, continual emails, calls or letters telling Coillte how to perform an investigation, repeatedly looking for information in a continuous and/or unreasonable manner, seeking a solution which is not realistic or proportionate to the matter raised, or seeking personal information on members of staff.
- 2.3 Obstructive communication** – this includes attempts to hinder the core business of Coillte, such as attempting to overload a division with excessive or voluminous correspondence; including by acting in concert with other individuals or bodies; and/or unreasonable requests to replace members of staff dealing with a query or seeking to provoke or create discord.
- 2.4 Unreasonable lack of co-operation** – Examples include but are not limited to: not identifying the issue(s) clearly in communication with Coillte or its staff, presenting too much information or manifestly disorganised information and expecting a swift response, a repeated failure to comply with Coillte procedures, withholding information which is needed to advance a query or complaint or failing to provide information to substantiate a complaint, changing the basis of their complaint or request in the middle of their engagement with Coillte or being misleading with the facts of their concern.
- 2.5 Unreasonable arguments** – Examples include, but are not limited to: misrepresenting issues, presenting irrelevant or unreasonable opinions, focusing on disproportionate or irrelevant details, advancing conspiracy theories that are unsupported by any evidence, insisting that a version of events is accepted as fact, despite an absence of objective evidence to support it, refusing to consider other versions of events, or being guided by desire for revenge or a grievance against Coillte, its employees and contractors.
- 2.6 Unreasonable behaviour** – Examples of unreasonable behaviours (whether oral or written) include submitting a Persistent and/or Vexatious

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Complaint (as defined in the Stakeholder Complaints and Dispute Resolution Procedure), bullying and harassment, threats, physical violence, physical or verbal abuse, derogatory, racist or grossly defamatory remarks, aggressive or intimidatory communication, and rudeness. It is also considered that inflammatory statements and unsubstantiated allegations that are intended primarily to annoy, disrupt, or cause inconvenience to Coillte rather than seek a genuine resolution of a legitimate grievance is considered unreasonable behaviour. Unreasonable behaviour may also include copying senior management or other staff within Coillte in communications for the purpose of intimidating or pressuring staff.

3.0 PROCEDURE TO MANAGE UNREASONABLE BEHAVIOUR & CONTACTS

If Coillte considers a service user or stakeholder's behaviour to be unreasonable, the person in question will be contacted by Coillte and asked to cease. However, if the service user or stakeholder in question has been contacted by Coillte within the previous 24 months in relation to the same or another behaviour which Coillte has deemed to be unreasonable there shall be no obligation on Coillte to issue a further request to cease and any such further request to cease will be made at Coillte's sole discretion.

If the unreasonable behaviour or contact continues, Coillte may take action to restrict or manage the service user or stakeholder contact with Coillte staff and contractors. This decision will only be taken after a Coillte review group ("**the Group**") has assessed the situation and has determined what restrictions are appropriate, proportionate and in line with the nature of the behaviour. Such restrictions may include but are not limited to:

- 3.1** Limiting contact to a particular contact channel or format or medium of contact (e.g. by letter only);
- 3.2** Providing a single point of contact;
- 3.3** Limiting the frequency and duration of contact over a set timeframe;
- 3.4** Restricting the number of complaints that will be acknowledged and addressed from a stakeholder and /or service user complainant within a specified timeframe and requiring that each complaint addresses a single, clearly defined issue. Future correspondence which is deemed to be unreasonable is read, acknowledged, and then filed but no substantive response is provided;
- 3.5** That Coillte will only consider a certain number of issues in a specific period. In such circumstances a request to prioritise an issue from the complainant will be considered;
- 3.6** Coillte may respond to the overall issue rather than each and every complaint that has been classified as Persistent and/or Vexatious Complaint (as defined in the Stakeholder Complaints and Dispute Resolution Procedure);
- 3.7** In exceptional circumstances, Coillte may sanction a temporary or permanent termination of contact with the service user or stakeholder if it

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appears that they are unlikely to modify their conduct, or their conduct is deemed by Coillte to pose a significant risk for our staff.

- 3.8** Where restrictions have been imposed on a service user or stakeholder on 3 or more occasions in a 24-month period then the sanction of an automatic period of termination of contact for a specified period, to be determined at Coillte's discretion, will apply.

In such cases, Coillte will write to the service user or stakeholder to inform them that their behaviour or contact has been found to be unreasonable and what restrictions on contact are being applied to address the matter. If the behaviour is so extreme that it threatens the immediate safety and welfare of Coillte staff or others, we will consider other options. These could include but are not limited to reporting the matter to An Garda Síochána or instigating legal action. In such cases, Coillte shall not be obliged to give prior warning of such action.

If a restriction on contact is imposed, it shall not in any way prejudice a stakeholder's rights with reference to Access to Information on the Environment under the Access to Information on the Environment (AIE) Regulations 2007 to 2014 (the "**AIE Regulations**").

Regardless of behaviour, Coillte staff will act respectfully and take an impartial attitude to any contact received.

4.0 APPEALING A RESTRICTION

A service user or stakeholder may request an appeal of a decision to impose restrictions. This can be done in writing to the Company Secretary setting out his/her grounds of appeal and specify what aspects of the decision they are not satisfied within ten working days of the decision. This will be considered by the Company Secretary, or a person nominated by them, who will determine if due process was followed by the Group in reaching a decision and that an appropriate restriction has been applied in the circumstances. The Company Secretary will aim to make this determination within one calendar month upon receipt of the appeal as outlined above, and the appellant will be informed of the determination in writing by email.

5.0 RECORDING OF INSTANCES OF UNREASONABLE BEHAVIOUR

A Central Register will be maintained by the Group to record all instances of unreasonable service user and stakeholder behaviour where sanctions or restrictions are applied. The stakeholder's name and contact details, together with details of any sanctions or restrictions that have been imposed will be recorded in the Central Register, which will be made available to appropriate staff members for the purpose of ensuring adherence to any sanctions or restrictions imposed. In line with Coillte's Privacy Notice, we will not keep this information for longer than is necessary to achieve the purpose for which it was collected.

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6.0 MONITORING

Once a service user or stakeholder has had their contact managed or restricted under this Policy, the Group will monitor the restriction during the sanctioned period, or on request by a staff member or team, or following any further incidents of unreasonable conduct, to ensure that the service user or stakeholder is complying with the restrictions. If the Group determines that the restrictions have been ineffective in managing the service user or stakeholder's conduct or are otherwise inappropriate, the Group may decide to either modify or extend the restrictions, impose further restrictions, or permanently or temporarily terminate the service user or stakeholder's access entirely. Where Restrictions/sanctions have been imposed on the service user on 3 or more occasions in a 24-month period then an automatic period of termination of contact for a specified period will apply.

7.0 REVIEW

The Policy is subject to ongoing review by Coillte.

8.0 REVISION HISTORY

Revision #	Change details	Reason for change	Date
1.0	New Document	N/a	March 2023
2.0	Full scale review of document	Updated sections 2, 2.6, 3.0, 3.2, 3.3, 3.5, 3.6 and includes new sections 4, 5, 6 & 7.	February 2024
2.1	Minor review of text	Update to Sections 3 and 7	April 2025
2.2	Minor review of text	Update to Sections 3, 4 & 6	April 2026