CNHC Complementary & Natural Healthcare Council

POLICY

Frequent, Vexatious and Abusive Complaints Policy

Version 2
Live from November 2026

Email: complaints@cnhc.org.uk
Telephone: 020 3327 2720
www.cnhc.org.uk

professional standards authority accredited register

CYBER ESSENTIALS CERTIFIED PLUS

POLICY

How we deal with frequent complaints, vexatious complaints and abusive behaviour

How we make sure every complaint is considered fairly on its merits, while protecting our staff, registrants and resources from unreasonable or abusive behaviour.

1 What this policy covers

1.1 Our purpose is to protect the public. Anyone can raise a concern about a CNHC registrant, and every complaint is considered on its merits under our **Detailed Procedures for Dealing with Complaints** and our **Informal Resolution Framework**.

1.2 Most people who contact us act reasonably, even when they are upset or frustrated. This policy explains how we deal with the small number of cases where a person:

a. makes frequent complaints (section 3);

b. makes complaints that are vexatious (section 4);

c. makes unreasonable demands or contact (section 5); or

d. behaves in a way that is abusive or threatening (section 6).

1.3 It applies to anyone who contacts us about a complaint, including complainants, registrants and their representatives, and to contact by email, letter, telephone, social media or in person.

1.4 This policy does not change anyone's right to complain or the way complaints are decided. If it conflicts with the Detailed Procedures, the Detailed Procedures apply.

1.5 In this policy, the Chief Executive means CNHC's Chief Executive and Registrar, who is one person.

2 Our principles

a. **Every complaint is considered on its merits.** How often someone complains, who they are, or their tone does not decide whether a complaint has substance.

b. **We focus on behaviour, not the person.** We look at what a person does, not at their reasons for raising concerns.

c. **Public protection comes first.** Whatever measures are in place, we will always consider new information that suggests a risk to the public (Procedures, paragraph 14.6).

d. **We act proportionately.** We use the least restrictive measure that will work, for the shortest time needed.

e. **We make reasonable adjustments.** Some behaviour may be linked to distress, disability or other circumstances. We will consider reasonable adjustments, in line with the Equality Act 2010, before deciding that behaviour is unreasonable.

f. **We are open about our decisions.** We tell the person, in writing, what we have decided, why, and whether they can ask for a review.

3 Frequent complaints

3.1 Some people raise concerns with us regularly, for example by monitoring registrants' advertising or by raising concerns about several registrants. This is not unreasonable in itself. Frequent complaints are often well founded and help us protect the public.

3.2 A complaint is not vexatious simply because the person has made other complaints, raises concerns about several registrants, or belongs to a group or campaign.

3.3 Each complaint is checked and assessed in the usual way (Procedures, paragraphs 14.2 and 14.3). For complaints about advertising, we also consider whether the matter is serious enough for CNHC to deal with, or whether it should be made to the Advertising Standards Authority (Advertising Guidance, section 2.4).

3.4 To deal with frequent complaints fairly and efficiently, we may:

- **a.** ask the person to use our complaint form and to send copies of the evidence, such as dated copies of web pages;
- **b.** agree one point of contact, and how and when we will give updates;
- **c.** consider related concerns together, where this is fair to the registrants involved; and
- **d.** deal with similar concerns in a consistent way, for example through early resolution, so that registrants are treated alike whoever raised the concern.

3.5 We may only treat a frequent complainant's complaint as vexatious if it meets the test in section 4.

3.6 Where a person's frequent complaints are an abuse of our process, we will tell them in writing that any further complaints may still be looked into and resolved informally, without being treated as a complaint and without us acknowledging them or keeping the person updated. Only where we identify a concern about a registrant's fitness to practise, or serious harm to the public, will the matter be dealt with as a complaint under the Procedures and acknowledged (Procedures, paragraph 14.11). We will record how we assessed each new concern, and why.

4 Vexatious complaints

4.1 A complaint may be vexatious where it is made, or pursued, other than to resolve a genuine concern. This may be the case where the person:

- **a.** pursues a complaint that has already been decided, including after a review, without any new and relevant information;
- **b.** keeps changing the substance of the complaint, or adding new concerns, in a way that prolongs contact rather than resolving the issue;
- **c.** does not say clearly what the complaint is about, despite reasonable help to do so;
- **d.** complains about matters that are trivial, or out of all proportion to their significance; or
- **e.** appears to be making the complaint mainly to cause distress, damage or disruption to a registrant, for example in a personal or business dispute, rather than to raise a concern about their practice.

4.2 Even where one of these applies, we will look at whether the complaint raises a genuine concern about a registrant's fitness to practise. If it does, we will deal with that concern under the Procedures.

4.3 A complaint being vexatious does not mean later complaints from the same person are vexatious. Each is considered separately.

4.4 Only the Chief Executive and Registrar can decide to close a complaint as vexatious. This forms part of the early, informal stage, before the complaint goes to the Case Examiners (Procedures, paragraph 14.10). This power should be used rarely, the reasons must be recorded, and the Chief Executive's decision is final.

5 Unreasonable demands and contact

5.1 We will always try to respond helpfully. But we may not be able to meet demands that would take up an unreasonable amount of our time, or that are unfair to others. Examples include:

a. contacting us very often, or contacting several members of staff about the same matter;

b. insisting on responses within an unreasonable time, or on a particular outcome;

c. expecting a reply to every point in long or repeated correspondence; or

d. refusing to accept a decision and repeatedly arguing the same points.

5.2 We do not have to reply to every point, or to repeat an answer we have already given. We will reply to any new and relevant information.

5.3 Raising a concern with, or asking for help from, an MP, a solicitor, the Professional Standards Authority or another organisation is never, on its own, evidence of unreasonable behaviour.

6 Abusive or threatening behaviour

6.1 We understand that people may be upset or angry when they contact us. But we will not accept behaviour that is threatening, abusive, offensive, discriminatory or harassing towards our staff, Case Examiners, Panel members or anyone else involved in a complaint.

6.2 On the telephone, staff may ask a caller to stop the behaviour. If it continues, they may warn the caller, then end the call. They will make a note of the call and tell their line manager. We may then ask the person to contact us by email or in writing only. Staff will have the chance to talk about what happened with their line manager, and will be offered any support they need.

6.3 Correspondence that is mainly abusive or threatening may be kept on file and not answered. We will note why, and pass it to the Chief Executive, who may write to the person to explain that it is not acceptable and what will happen if it continues.

6.4 We do not need to give a warning before acting on threats or violence. Any threat of violence, credible or imminent threat of harm, or assault will be reported to the police straight away. The Chief Executive, or the most senior person available, decides on the referral.

6.5 If a registrant behaves in this way, it may also raise a concern under the Code of Conduct, Ethics and Performance, which we will consider separately.

6.6 If what a person tells us suggests a genuine and immediate risk to their own safety or to others, the Chief Executive, or the most senior person available, may refer it without warning to the police, the ambulance service, social services or another appropriate body. We will take data protection law into account, record the decision, who made it and why, and tell the person where we can, unless that would increase the risk or the law does not allow it.

7 What we may do

We use the least restrictive measure that will work. We will normally give a warning, and a chance to change the behaviour, before moving to measures 4, 5 and 7, unless the behaviour involves threats or violence.

	Measure	Decided by	Safeguards
1	Explain what we can and cannot do, and what we expect	Staff, with their line manager	Always the first step
2	Agree a way of working, such as one point of contact, a set frequency of updates, or sending related concerns together	Head of Operations and Governance	Normally agreed with the person
3	Decline to reply again to points we have already answered, or to reopen a closed complaint without new and relevant information	Head of Operations and Governance	Told in writing, with reasons
4	Restrict contact to email or writing only, to a named member of staff, to set times, or through a third party	Chief Executive	Normally after a warning; looked at again every 6 months; can be reviewed by the Chair
5	Close a complaint as vexatious	Chief Executive	Used rarely; told in writing, with reasons. The decision is final
6	Leave abusive or threatening correspondence unanswered, end abusive calls, or refer threats to the police	Staff, then the Chief Executive	No warning needed for threats or violence
7	Where frequent complaints are an abuse of our process, resolve further complaints without acknowledging them or keeping the person updated (paragraph 3.6)	Chief Executive	Told in writing first; fitness to practise concerns or serious harm to the public still dealt with under the Procedures and acknowledged; looked at again every 6 months; can be reviewed by the Chair

7.1 No measure stops a person making a new complaint, or stops us acting on new information about a risk to the public. A new complaint is assessed on its merits.

7.2 Measures 4, 5 and 7 can only be used with the Chief Executive's agreement. Before measures 4 or 7 are used, the Head of Operations and Governance, or another person the Chief Executive nominates, gives the Chief Executive a written summary of the evidence and the measure proposed. Measures 4 and 7 are normally put in place for up to 12 months, and are looked at again at least every 6 months. We tell the person the outcome of each review in writing. A measure ends sooner if it is no longer needed.

8 Telling the person and asking for a review

8.1 Before using measures 3 to 5 or 7, we will normally write to the person to give them a warning and a chance to respond and change the behaviour. The warning explains why we think the behaviour is unreasonable or unacceptable, the effect it is having, and what may happen if it continues, and includes a copy of this policy.

8.2 If we decide to use measures 3 to 5 or 7, we will write to the person to explain:

- **a.** what we have decided, and why;
- **b.** what the measure means for them in practice, how long it will last, and how and when it will be reviewed; and
- **c.** whether they can ask for a review and, if so, how.

8.3 A person may ask for a review of a decision under this policy within 28 days of being told about it. A decision made by staff or the Head of Operations and Governance is reviewed by the Chief Executive. A decision by the Chief Executive to use measure 4 or 7 is reviewed by the Chair of the Board, or by another Board member not previously involved if the Chair has a conflict of interest. The reviewer will tell the person the outcome, with reasons, normally within 28 days. A review looks only at the measure, and does not reopen the complaint. A decision to close a complaint as vexatious (measure 5) is final (Procedures, paragraph 14.10), as are the Chief Executive's other decisions under this policy.

8.4 If we restrict how someone can contact us, we will tell the registrant or complainant involved in the complaint only what they need to know to deal with the complaint.

9 Records and monitoring

9.1 We record every decision under this policy, the reasons, any warning given, and the date for review. Records are kept securely, in line with data protection law and our Record Retention Schedule.

9.2 We report each year to the Board on how this policy has been used, including the number of measures put in place, reviews, and outcomes. We use this to check that the policy is applied fairly and consistently.

10 Review

10.1 We will review this policy every two years, or sooner if the Detailed Procedures or the PSA's Standards change.

Document control

Version	2
Status	Live from November 2026
Replaces	Policy for dealing with Vexatious Complaints and Abusive Complainants (August 2014, reviewed 2019). Adds frequent complaints, a range of measures, reasonable adjustments, a right to ask for a review of some decisions, including review by the Chair, and links to the 2026 complaints library.
Owner	Head of Operations and Governance
Approved by	The Head of Operations and Governance and the Chief Executive (shared with the Board for information)
Classification	Public
Date approved	October 2026
Effective from	November 2026
Next review	October 2028

Questions about this document: email **complaints@cnhc.org.uk** (our main contact method) or telephone 020 3327 2720.