

Managing Unreasonable Correspondence and AI Assisted Communications Policy

National Police Freedom of Information and Data Protection Unit



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Introduction

The National Police Freedom of Information and Data Protection Unit (NPFDU) is committed to supporting transparency, accountability and compliance with information rights legislation across UK policing. The Unit provides advice and support on Freedom of Information (FOI) and Data Protection (DP), coordinates national approaches to information governance and responds to requests made to the National Police Chiefs' Council (NPCC) for FOI and Right of Access.

The NPFDU recognises that individuals have a legal right to request information and to challenge decisions through appropriate review and complaint mechanisms. We are committed to providing advice and assistance wherever possible. However, the increasing use of technology, including artificial intelligence (AI), has contributed to an increase in lengthy, repetitive, complex and resource-intensive correspondence which can place a disproportionate burden on public authorities.

This policy explains how the NPFDU will manage correspondence and behaviour that is unreasonably persistent, burdensome, disruptive or abusive while ensuring individuals' statutory rights continue to be respected.

Our principles

The NPFDU will:

- Treat all correspondents fairly, professionally and with respect.
- Recognise the right of individuals to pursue requests, complaints and reviews.
- Distinguish between legitimate persistence and unreasonable conduct.
- Comply with the Freedom of Information Act 2000 and Data Protection legislation.
- Provide reasonable advice and assistance to help requesters clarify or refine requests.
- Protect staff wellbeing and ensure public resources are used effectively.

What The Policy Means in Practice

NPFDU expects all interactions to be conducted in a respectful and constructive manner. We are committed to protecting our staff from abusive, threatening or otherwise unreasonable behaviour. Where such behaviour occurs, we may take proportionate action to manage contact and, where necessary, place restrictions on



future communications to ensure the wellbeing of staff and the effective delivery of our services.

Understanding Unreasonable Correspondence

NPFDU expects all individuals engaging with our services to treat staff with courtesy and respect. We recognise that people may sometimes feel frustrated, distressed, determined, or dissatisfied with the outcome of a request, enquiry or complaint. Such emotions do not, in themselves, constitute unreasonable behaviour.

A requester will not be considered unreasonable solely because they:

- Submit multiple requests.
- Disagree with an NPFDU decision.
- Pursue their legal rights.
- Request an Internal Review.
- Make requests using AI or other technology.

It is not always possible to define unacceptable behaviour precisely, as it can take many forms and must be considered in context. However, NPFDU may consider behaviour unacceptable where it causes staff to feel distressed, intimidated, harassed, threatened or unsafe, or where it adversely affects their ability to carry out their duties. Examples may include abusive, offensive, discriminatory or derogatory language, personal insults, aggressive or inflammatory comments, harassment, unsubstantiated allegations, threats, or other conduct that is disrespectful, inappropriate or intended to intimidate.

NPFDU may also consider contact to be unreasonable where the nature or volume of communications places a disproportionate demand on staff time and organisational resources. This may include repeatedly raising matters that have already been fully considered and responded to, sending excessive correspondence, contacting multiple members of staff about the same issue, pursuing matters outside NPFDU's remit, or declining to accept explanations, evidence or decisions that have been reasonably provided. When assessing such situations, NPFDU will consider the nature, frequency and impact of the contact, together with any steps already taken to address the matter.

Understanding Unreasonably Persistent or Burdensome Conduct

Examples may include but are not limited to:

- Repeatedly submitting substantially similar requests or reviews after a matter has been concluded.
- Sending excessive volumes of correspondence regarding the same issue.
- Refusing to engage with reasonable clarification requests.
- Repeatedly raising matters outside the remit of the NPFDU, despite explanations and advice from us.
- Using AI-generated submissions to generate large volumes of repetitive correspondence.
- Pursuing issues which have already been fully considered and closed.
- Making demands which are incompatible with legislation or established procedures.
- Contacting multiple members of staff simultaneously regarding the same issue, both within NPFDU and across policing.
- Correspondence whose primary effect is to disrupt operations rather than obtain information.

Advice and Assistance

Before considering any restrictions, the NPFDU will seek to assist requesters where appropriate. The NPFDU aims to seek a collaborative approach wherever possible and support requesters by providing advice, to ensure the requester receives the best possible outcome and service.

This may include:

- Clarifying the scope of a request.
- Explaining relevant FOIA provisions.
- Identifying information already publicly available.
- Helping narrow a request that exceeds the appropriate cost limit.
- Explaining why certain requests may be considered repeated or vexatious.

- Warning the requester their behaviour is approaching unreasonable, and a copy of this policy may be shared.

Managing Unreasonable Correspondence

Where correspondence becomes unreasonably persistent, burdensome or disruptive, the NPFDU may take proportionate measures to manage communications to support the welfare of our staff as well as inform the requester.

These may include:

- Requesting that correspondence is consolidated into a single communication.
- Assigning a single point of contact.
- Restricting communication to a single channel.
- Limiting responses to matters that raise new issues or information.
- Declining to revisit matters that have been fully concluded.
- Applying relevant provisions of the FOIA, including sections 12 and 14 where appropriate.
- We may request the customer to enter into an agreement about their future conduct.

Any action taken will be proportionate, documented and capable of review, 6-12 months after any restrictions have been put in place, depending on the circumstances. NPFDU will notify the requester what restrictions have been put in place and the review period. Where the requester has changed their behaviour to the extent that the NPFDU does not believe that the policy should continue to apply, we will amend or remove the contact restrictions and inform the requester.

Where a requester continues to behave in such a way which is unreasonably persistent or unacceptable, we may decide to continue to restrict access to the NPFDU for the purpose of pursuing a previous complaint.

Abusive or Threatening Behaviour

The NPFDU operates a zero-tolerance approach to abusive, threatening, discriminatory or intimidating behaviour towards staff.

Examples include:

- Threats of violence.
- Harassment.
- Personal abuse.
- Offensive or discriminatory language.
- Malicious allegations against staff.

Where such behaviour occurs, contact may be restricted immediately and, where appropriate, referred to police, security, legal services or other relevant bodies as appropriate.

Use of Artificial Intelligence

The NPFDU acknowledges that AI can assist individuals in exercising their information rights and requesters may use AI tools to draft requests and correspondence. However, requesters are encouraged to review AI-generated correspondence before submission. The use of AI does not make a request invalid. However, AI-generated requests can be excessively broad, repetitive, unclear, contain factual inaccuracies including fabricated information or misleading inaccuracies, and create an unnecessary administrative burden.

In line with ICO guidance, requesters should ensure:

- Requests are clear and focused.
- They only ask for information genuinely required.
- AI-generated factual statements are checked for accuracy.
- Correspondence remains respectful and proportionate.

The NPFDU may seek clarification where AI-generated correspondence is unclear, overly broad or contains inaccuracies affecting our ability to process the request efficiently.

Review and Appeals

Any decision to apply communication restrictions will be made by either the NPFDU Manager or Deputy Manager. Restrictions will be reviewed periodically and may be challenged by requesting a review by a either manager not involved in the original decision where practicable. Restrictions will be removed where they are no longer necessary or proportionate and a change of behaviour has been demonstrated.

If requesters remain unhappy about how they have been handled under this policy and believe it has impacted their right to access information, they have the right to apply directly to the Information Commissioner. For information on how to make an application to the Information Commissioner please visit their website at www.ico.org.uk alternatively, write to or phone:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 0303 123 1113