

Unreasonable Behaviour

Policy Statement

The Office of the Information and Privacy Commissioner (OIPC) is committed to providing respectful, independent and impartial services to all individuals. We strive to foster constructive and professional interactions. People who engage with the Office are expected to behave and communicate respectfully to receive service.

This policy outlines how OIPC identifies and responds to unreasonable behaviour in a manner that is consistent, fair, safe, and effective.

Purpose

This policy is to ensure that all interaction with OIPC is respectful, allowing fair and efficient service. The policy is intended to:

- ensure a safe and respectful environment;
- provide clarity regarding behaviours OIPC considers unreasonable;
- establish a consistent, fair and transparent process for managing unreasonable behaviours; and
- support the efficient functioning of OIPC.

Application

This policy applies to all OIPC staff and all individuals including interaction by way of in-person, telephone, email, written correspondence, virtual meetings and social media communication.

This policy applies to an individual's behaviour; it is conduct-based. This policy does not impact the merits of access requests, complaint investigations, or applications before OIPC. Only the behaviour is escalated to management for review and application of this policy.

Unreasonable Behaviour

Unreasonable behaviour is conduct that, because of its nature, frequency, or severity, interferes with OIPC's ability to provide services. Behaviour may be considered unreasonable when it falls into one or more of the following categories.

Excessive or repeated demands on the time and resources of OIPC, including:

- lengthy and/or frequent phone calls;
- voluminous and/or frequent correspondence;
- demanding immediate attention; or
- insisting on outcomes OIPC cannot provide under legislation.

Excessive persistence towards OIPC, including:

- continuing to pursue issues that have already been addressed or resolved;
- repeatedly challenging explanations; or
- attempting to reopen closed files.

Engaging in any form of disrespectful, aggressive or threatening interactions with OIPC staff that:

- is abusive, derogatory, discriminatory;
- uses threatening language;
- involves name calling or insults;
- consists of shouting, interrupting or incessant speech;
- attempts to pressure or intimidate;
- attempts to control access to any one staff member;
- uses high volume communication that disrupts or interferes with office processes; or
- uses public escalation to attempt to influence or interfere with investigations.

Providing false, misleading, or selectively incomplete information in a manner that interferes with OIPC's services, such as:

- refusing to provide information or providing false or misleading information in response to questions; or
- covertly recording meetings and conversations with staff.

Loitering, interfering or causing a disturbance. Behaviour that intimidates, prevents staff from carrying out their duties, or impedes access to services by others.

Responding to Unreasonable Behaviour

OIPC will consider all relevant circumstances when determining the existence of and response to unreasonable behaviour.

OIPC's response will be limited to what is needed to prevent or mitigate the effects of an individual's unreasonable behaviour, while continuing to provide access to OIPC's services.

Individuals will be told when their behaviour is unreasonable and, in some instances, this will be followed up in writing. When required, OIPC will implement measures to mitigate or control continued unreasonable behaviour.

OIPC maintains discretion to determine the methods necessary to mitigate unreasonable behaviour(s) of individuals but may include:

- **Setting limits on communication**
Example: Specifying how often the individual may contact the Office.
- **Limited communication methods**
Examples: Requiring communication be in writing only; or limiting communication to a single designated email address.
- **Assigning a single point of contact**
Example: All communication must go through a senior staff member.
- **Specifying topics allowed for discussion**
Example: Staff will decline to communicate on issues repeatedly addressed or outside of office's jurisdiction.
- **Requiring appointments for contact**
Example: No unscheduled communication; interactions occur only through scheduled phone calls.
- **Limiting in-person contact**
Examples: Meetings may only take place on the phone, virtually, or with more than one staff member present with specific permission.
- **Ending Conversations**
Example: Advising the individual that staff will immediately end discussions that violate this policy
- **Not reviewing or responding to communications**
Example: Advising individuals that communication received will not be reviewed or responded to.
- **Stop Communications**
Example: Directing an individual to stop contacting the Office.

Process Responses

- **Discontinuing non-essential services**
Example: Continuing only the services that must be provided by law; discretionary services may be limited

Office Administration and Operational Policy
Unreasonable Behaviour


- **Setting limits on process**

Examples: Limiting the number, length, or frequency of submissions or correspondence the individual may provide during current or future complaint investigations.

Other Responses

- Any other response the Commissioner considers appropriate in the circumstances.

Approved by Information and Privacy Commissioner



Commissioner

March 26, 2026
Date