

Screening

Policy scoping

Information about the policy

Policy name	Vexatious complaints, enquiries, unreasonable and abusive behaviour policy
Existing/Revised/New policy	New Policy
What is the policy trying to achieve	This policy aims to establish guidance on when telephone calls to the Commission, correspondence and/or complaints might be vexatious. It also applies to other wider contacts with the Commission such as meetings. It is intended to deal with those individuals who persist in making what are considered to be vexatious or unreasonable demands either by way of correspondence, telephone calls or complaints whether the caller or service user has or has not made any request for information recovery to the Commission.
Policy author	Policy and Operations Team, ICRIR
Policy owner	Commissioner for Investigations

Are there any S75 categories which might be expected to benefit from the intended policy? If so, explain how.

No.

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

Legislative: [The Health and Safety at Work \(Northern Ireland\) Order 1978](#) - All employers have legal responsibility to ensure the health, safety and welfare at work of their employees. This is understood to include minimising the risk of work-related mental health issues as well as physical health and injury.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

Staff: Case Support	Actual
People who use our service: Requesting Individuals and families of those who died/ suffered serious harm as a result of a Troubles/ Conflict related incident	Actual
Other public sector organisations	
Voluntary/community/trade unions: proxy organisations	Potential
Other, please specify: legal representatives	Potential

Other policies with a bearing on this policy

Name	Who Owns
Safeguarding Policy	Head of Safeguarding
Handling a Request Policy	Commissioner for Investigations
Assessing Mental Capacity Policy	Commissioner for Investigations

Available evidence

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Please note policy written before any staff employed so no internal information available.

Religious Belief	Northern Ireland is traditionally split between those identifying as Protestant (around 42%) and Catholic (about 41%), with increasing numbers identifying as having no religion or other religions.
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On Census Day 2021 just under one person in five (19.0%) either had 'no religion' (17.4%) or 'religion not stated' (1.6%). The equivalent percentages for the main religions were:

- Catholic (42.3%)
- Presbyterian Church in Ireland (16.6%)
- Church of Ireland (11.5%)
- Methodist (2.4%)
- Other Christian denominations (6.9%)
- Other non-Christian Religions (1.3%)

Religion has been recorded in the census in Ireland/Northern Ireland since 1861 and the table below shows how the main religious groupings have changed over the 1961 (just before the Troubles began). The table shows the increase in the population who have 'no religion' or 'religion not stated' over the last sixty years; this group is now second only to Catholic. This points to the increasingly secular nature of the population.

Census year	All usual residents	Catholic	Presbyterian Church in Ireland	Church of Ireland	Methodist Church in Ireland	Other religions	None/Not Stated
1961	1,425,042	34.91%	28.99%	24.20%	5.04%	5.00%	1.85%
1971	1,519,640	31.45%	26.70%	22.00%	4.69%	5.79%	9.38%
1981	1,481,959	27.97%	22.93%	18.99%	3.96%	7.61%	18.53%
1991	1,577,836	38.38%	21.35%	17.70%	3.77%	7.76%	11.03%
2001	1,685,267	40.26%	20.69%	15.30%	3.51%	6.36%	13.88%
2011	1,810,863	40.76%	19.06%	13.74%	3.00%	6.58%	16.87%
2021	1,903,178	42.31%	16.61%	11.55%	2.35%	8.19%	19.00%

Source: [Census 2021 main statistics for settlements and wards in Northern Ireland](https://www.nisra.gov.uk/census-2021-main-statistics-for-settlements-and-wards-in-northern-ireland) | Northern Ireland Statistics and Research Agency ([nisra.gov.uk](https://www.nisra.gov.uk)) (Table MS-B22)

Political Opinion

The political landscape in Northern Ireland is unique, with political opinions often aligning with religious or national identity.

Political affiliations in Northern Ireland often correlate with religious and national identity, with Unionists (typically Protestant) and Nationalists (typically Catholic) making up the largest groups. However, no precise

	statistics on political opinions are routinely collected due to sensitivities surrounding this information. In 2021, 31.86% of “All Usual Residents” declared their national identity as British Only; 29.13% selected Irish Only; and 19.78% stated Northern Irish Only. Since 2011, those declaring themselves as British Only and Northern Irish Only has declined by approximately 8 percentage points and 2 percentage points respectively in their share of the national identity categories. Source: Census 2021 main statistics for settlements and wards in Northern Ireland Northern Ireland Statistics and Research Agency (nisra.gov.uk) (Table MS-B15)
Racial Group	Around 98% of Northern Ireland’s population identifies as white, with 2% belonging to minority ethnic groups (e.g., Black, Asian, Mixed). The 2021 Census data also revealed growth in the minority ethnic population. Within the time period in which the deaths and serious harm which the ICIR can investigate occurred, the percentage of the population which identifies as white was even higher.
Age	The Northern Ireland Troubles (Legacy and Reconciliation) Act 2023 sets out that “the Troubles” means the events and conduct that related to Northern Ireland affairs and occurred during the period— (a)beginning with 1 January 1966, and (b)ending with 10 April 1998. The Commission recognises therefore that many people who are eligible to make a request for an investigation are likely to be older. In addition, the Census 2021, one person in four (24.3% or 463,000 people) had a limiting long term health problem or disability, 40% of which were aged 65 or more (185,300 people).
Marital Status	The most recent Northern Ireland Census shows a declining trend in marriage rates, with more people opting for civil partnerships or remaining single. Northern Ireland Census 2021 data shows a decline in marriage rates, with 42% of adults married, 11% divorced, and an increasing number of people opting for civil partnerships or remaining single.
Sexual Orientation	Sexual orientation data indicates around 2% of the population identifies as LGB (Lesbian, Gay, Bisexual) based on NISRA's Continuous Household Survey.

Men and Women Generally	The Northern Ireland Census 2021 produced the following demographic breakdown for Northern Ireland: • Female 50.81% • Male 49.19% Census 2021 main statistics demography tables – age and sex
Disability	According to the NISRA, around 21% of Northern Ireland’s population lives with a disability. This percentage increases with age. Requesting Individuals who have themselves suffered serious harm as a result of a serious injury related to the Troubles / Conflict will be more likely than the general public to be living with a disability. In the Census 2021, one person in four (24.3% or 463,000 people) had a limiting long term health problem or disability, 40% of which were aged 65 or more (185,300 people). In total, 1.44 million people (75.7%) indicated they did not have a limiting long-term health problem or disability. The number of people with a limiting long-term health problem or disability increased from the 2011 to 2021 Census. The increase, from 374,600 people in 2011 to 463,000 people in 2021 (an increase of 23.6%), will be driven partly by our ageing population. Census 2021 shows us that 34.7% of people had one or more long-term health conditions (659,800 people). The most prevalent conditions (whether solely or in combination with others) were ‘Long-term pain or discomfort’ (11.6% of people), ‘Mobility or dexterity difficulty that limits basic physical activities’ (10.9% of people) and ‘Shortness of breath or difficulty breathing’ (10.3% of people). For the first time Census 2021 included ‘Autism or Asperger syndrome’ as a listed health condition and 35,000 people were recorded with this condition. Of this, 19,000 children (or one child in twenty) had ‘Autism or Asperger syndrome’ recorded. A few key results for other listed conditions are ‘Emotional, psychological or mental health’ 165,100 people (8.7%), ‘Deafness or partial hearing loss’ 109,500 people (5.8%), ‘Learning difficulty (for example dyslexia)’ 59,900 people (3.1%) and ‘Blindness or partial sight loss’ 34,000 people (1.8%). Also, those reporting ‘Emotional, psychological or mental health’ conditions tend to be middle aged (higher prevalence at age 40 to 64). It is important to remember that the statistics presented here relate to self-reported health conditions. Source: Census 2021 Main statistics for Northern Ireland - Statistical bulletin - Health (nisra.gov.uk)

The Department for Health NI publishes a [Health Inequalities Annual Report](#). The 2024 report highlights that “large inequality gaps continue to exist for mental health indicators”. It found that:

- Prescription rates for mood and anxiety disorders increased regionally and for most and least deprived areas between 2018 and 2022, with the rate in the most deprived areas 67% higher than in the least deprived areas.
- In 2020-22, the suicide mortality rate in the most deprived areas was more than two and half times that observed in the least deprived areas.

The [Commission for Victims and Survivors 2021 population survey](#) found:

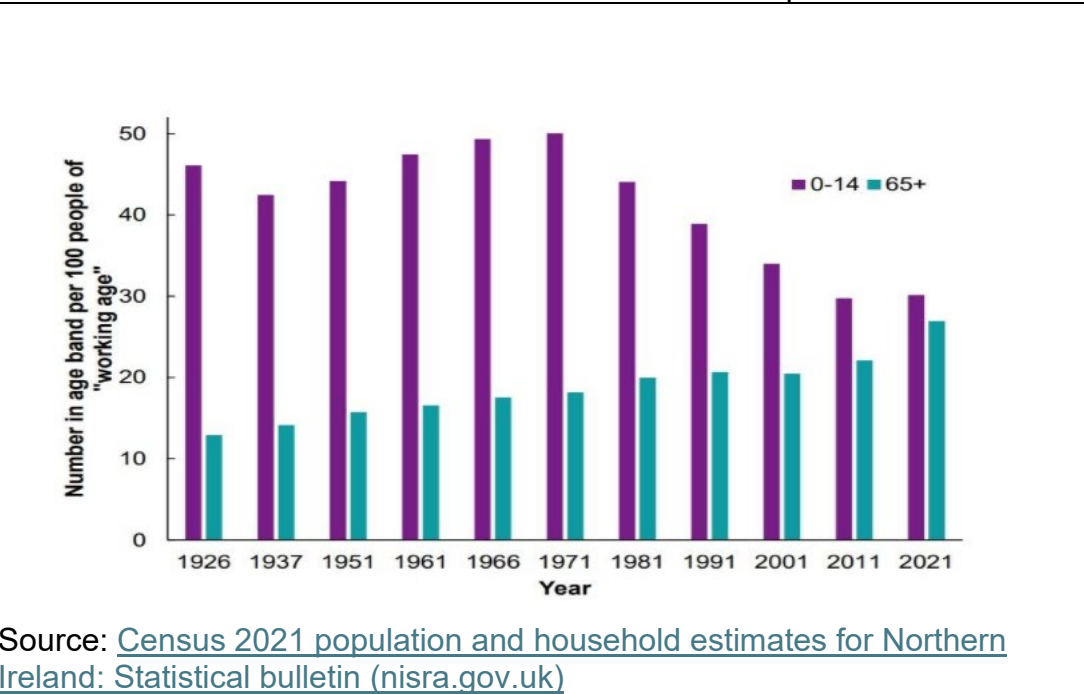
- 24% of the population met the legal definition of a victim and/or survivor of the NI Troubles/Conflict.
- 21% felt the Troubles/Conflict affected their mental health.
- 45% had been present at, or witnessed, a Troubles/Conflict-related incident

The Department for Health NI publishes a [Health Inequalities Annual Report](#). The 2025 report highlights that “large inequality gaps continue to exist for mental health indicators”. It found that:

- Prescription rates for mood and anxiety disorders increased regionally and for most and least deprived areas between 2019 and 2023, with the rate in the most deprived areas two-thirds higher than in the least deprived areas.

In 2021-23, the suicide mortality rate in the most deprived areas was almost three times the rate observed in the least deprived areas.

Dependants



	Census 2021 shows that there were 365,200 children (aged 0 to 14) or 19% of the population. While the population grows, household sizes continue to fall - the average household size has fallen from 2.54 in 2011 to 2.44 in 2021.
Gender Reassignment (required under Equality Act 2010):	Data on individuals who have undergone or are undergoing gender reassignment is scarce due to privacy concerns. However, estimates suggest that around 1% of the UK population identifies as transgender or non-binary. (Not required for section 75 but is required under the Equality Act)

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision?

Specify details of the needs, experiences and priorities for each of the Section 75 categories below:

Religious belief	The policy recognises that people with specific religious beliefs may find engagement with state agencies more challenging due to negative past experiences. The Commission will take a TRIM-centred approach to ensure these individuals are supported throughout their engagement with the Commission.
Political Opinion	The policy recognises that people with specific political opinions may find engagement with state agencies more challenging due to negative past experiences. The Commission will take a TRIM-centred approach to ensure these individuals are supported throughout their engagement with the Commission.
Racial Group	The Commission will provide information to victims, survivors and their families about Troubles-related deaths and serious injury and promote reconciliation and will not be delivering its services differently on needs and experiences and priorities for any of this category.
Age	The Commission recognises the intersectionality of age and disability, as shown by the evidence above which highlights the prevalence of emotional, psychological or mental health conditions in those aged 40-64.

	It is possible that some unreasonable, abusive or vexatious behaviour displayed towards the Commission by older service users may be attributable to cognitive decline brought on by a mental health condition and which may amount to a recognised disability, such as Alzheimer's. The Commission will take a TRIM-centred approach to ensure these individuals are supported throughout their engagement with the Commission.
Marital status	The Commission will provide information to victims, survivors and their families about Troubles-related deaths and serious injury and promote reconciliation and will not be delivering its services differently on needs and experiences and priorities for any of this category.
Sexual orientation	The Commission will provide information to victims, survivors and their families about Troubles-related deaths and serious injury and promote reconciliation and will not be delivering its services differently on needs and experiences and priorities for any of this category.
Men and Women generally	The Commission will provide information to victims, survivors and their families about Troubles-related deaths and serious injury and promote reconciliation and will not be delivering its services differently on needs and experiences and priorities for any of this category.
Disability	The Commission recognises that people living with specific disabilities may be more likely to display behaviour which meets the criteria for unreasonable, abusive or vexatious behaviour as defined in the policy. The Commission will adopt a TRIM-centred approach to support these individuals and will make it a priority to ensure their needs are considered if situations arise during the engagement process in which these individuals may display unreasonable, abusive or vexatious behaviour.
Dependants	The Commission will provide information to victims, survivors and their families about Troubles-related deaths and serious injury and promote reconciliation and will not be delivering its services differently on needs and experiences and priorities for any of this category.

Part 2. Screening questions

Introduction

1. **What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 equality categories?**

Details of the likely policy impacts on **Religious belief**:

Assessment: Individuals with specific religious beliefs may be affected by this policy.

Rationale: Individuals with specific religious beliefs may find engagement with state agencies more challenging due to negative past experiences.

Mitigations: The Commission will seek to mitigate this by adopting a TRIM-centred approach and supporting these individuals throughout their engagement with the Commission.

See Disability section in needs, experiences and priorities question above

Level of Impact	Major	Minor	None
		X	

Details of the likely policy impacts on **Political Opinion**:

Assessment: Individuals with specific political opinions may be affected by this policy.

Rationale: Individuals with specific political opinions may find engagement with state agencies more challenging due to negative past experiences.

Mitigations: The Commission will seek to mitigate this by adopting a TRIM-centred approach and supporting these individuals throughout their engagement with the Commission.

Level of Impact	Major	Minor	None
		X	

Details of the likely policy impacts on **Racial Groups**:

Level of Impact	Major	Minor	None

			X
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Details of the likely policy impacts on **age**:

Assessment: Older individuals may be affected by this policy.

Rationale: The Commission recognises the intersectionality of age and disability, as shown by the evidence above which highlights the prevalence of emotional, psychological or mental health conditions in older individuals. These conditions may cause the individual affected to display unreasonable, abusive or vexatious behaviour.

Mitigations: The Commission will seek to mitigate this by adopting a TRIM-centred approach and supporting these individuals throughout their engagement with the Commission.

Level of Impact	Major	Minor	None
		X	

Details of the likely policy impacts on **Marital Status**:

Level of Impact	Major	Minor	None
			X

Details of the likely policy impacts on **Sexual Orientation**:

Level of Impact	Major	Minor	None
			X

Details of the likely policy impacts on **Men and Women**:

Level of Impact	Major	Minor	None
			X

Details of the likely policy impacts on **disability**:

Assessment: Individuals living with a disability be affected by this policy.

Rationale: As per the evidence above, around 21% of Northern Ireland's population lives with a disability (a statistic which increases with age). The evidence also highlights the prevalence of emotional, psychological or mental health conditions in older individuals which may give rise to unreasonable, abusive or vexatious behaviour.

Mitigations: The Commission will seek to mitigate this by adopting a TRIM-centred approach and supporting these individuals throughout their engagement with the Commission.

Level of Impact	Major	Minor	None
		X	

Details of the likely policy impacts on **Dependants**:

Level of Impact	Major	Minor	None
			X

2. **Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?**

No. The policy is already designed act as a mechanism for building public trust in the Commission, and its commitment to dealing with vexatious complaints, enquiries, unreasonable and abusive behaviour from members of the public towards Commission staff appropriately and safely. Its implementation is not expected to result in unequal treatment. Therefore, no further opportunities to promote equality of opportunity have been identified within the scope of this specific policy.

Detail opportunities of how this policy could promote equality of opportunity for people within each of the Section 75 Categories below:

Religious Belief - If Yes, provide details: **No**.

Political Opinion - If Yes, provide details: **No**.

Racial Group - If Yes, provide details: **No**.

Age - If Yes, provide details: **No**.

Marital Status - If Yes, provide details: **No**.

Sexual Orientation - If Yes, provide details: **No**.

Men and Women generally - If Yes, provide details: **No**.

Disability - If Yes, provide details: **No**.

Dependants - If Yes, provide details: **No**.

3. **To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?**

Please provide details of the likely policy impact and determine the level of impact for each of the categories below i.e. either minor, major or none.

Details of the likely policy impacts on **Religious belief**:
None identified

Details of the likely policy impacts on **Political Opinion**:
None identified

Details of the likely policy impacts on **Racial Group**:
None identified

4. **Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?**

None identified

Additional considerations

Multiple identity

It is recognised that this policy may impact on people with multiple identities. The Commission acknowledges that individuals with multiple identities may experience unique impacts. We will ensure that these are fully considered, and accommodations are made where necessary.

The Commission recognises the diverse needs of individuals with disabilities, those from different religious and community backgrounds and those with differing political opinions. Considering these intersecting identities helps ensure that mitigations are applied in relation to dealing with vexatious complaints, enquiries, unreasonable and abusive behaviour from members of the public where necessary, preventing disadvantage to any group. This will include adopting a TRIM-centred approach to individuals with intersecting identities and ensuring that communications from which unreasonable, abusive or vexatious behaviours may arise are carried out in a timely, effective and supportive manner.

Part 3. Screening decision

Screening outcome: Screened out

Decision: The decision is not to conduct an equality impact assessment for the policy on Vexatious complaints, enquiries, unreasonable and abusive behaviour.

Mitigation

The aim of this policy is to set the boundaries for any Commission activity that may bring its staff into contact with those individuals who persist in making what are considered to be vexatious or unreasonable demands either by way of correspondence, telephone calls or complaints whether the caller or service user has or has not made any request for information recovery to the Commission. It also outlines what to do in those situations. The policy is in place to ensure:

- To make it clear what the Commission will or will not do in relation to contact by persistent and vexatious individuals (including requesting individuals) and managing their expectations:
- To ensure that all individuals (including requesting individuals), including those whose actions and behaviour are considered unacceptable, are dealt with fairly, honestly, consistently and appropriately.
- To ensure that other individuals (including requesting individuals) and the Commission staff do not suffer any disadvantage from individuals (including requesting individuals) and who act in an unacceptable manner. That other individuals (including requesting individuals) and the Commission staff do not suffer any disadvantage from individuals (including requesting individuals) who act in an unreasonable, abusive or vexatious manner, as defined in the policy

While the Commission will not tolerate abusive behaviour towards its staff, it is committed to making reasonable adjustments to accommodate individuals with specific needs.

As detailed in the evidence above, the Commission recognises that individuals may be living with specific physical, psychological, mental health or emotional needs, and are committed to providing reasonable accommodations for these needs to ensure individuals are able to fully participate in the investigative process.

This includes offering accessible formats for communication, providing support for individuals with sensory or mobility impairments, and making adjustments to facilities or procedures as needed. These adjustments will ensure that the physical and mental wellbeing is maintained as much as possible including meeting in a more suitable location and time which is suitable to the individual's needs.

Approval and authorisation

Screened by: Establishment Programme Team

Date: 1 May 2024

Screened by: OPAC Team

Date: 1 April 2026

Approved by: Commissioner for Investigations

Date: 1 May 2026