

Minutes of the Meeting of the **VEXATIOUS  
CORRESPONDENCE AND COMPLAINTS POLICY  
SUB-COMMITTEE** held at the Town Hall, Swanage on  
**TUESDAY 2<sup>nd</sup> DECEMBER 2025** at **4.30 p.m.**

**Present:** Councillor S. Vile - Chairman

Councillor M. Bonfield

Councillor C. Moreton

|                            |                      |  |
|----------------------------|----------------------|--|
| <b>Also in attendance:</b> | Councillor C. Sutton | Swanage Town Council                         |
|                            | Dr M. Ayres          | Town Clerk                                   |
|                            | Miss N. Clark        | Planning and Community<br>Engagement Manager |

**Public Participation Time**

There were no members of the public present at the meeting.

**1) Election of Sub-Committee chairman**

It was proposed by Councillor Bonfield, seconded by Councillor Moreton and  
RESOLVED UNANIMOUSLY:-

That Councillor Vile be elected as Chairman of the  
Vexatious Correspondence and Complaints Policy  
Sub-Committee for 2025/26.

**2) Apologies**

Apologies for his inability to attend the meeting were received from Councillor Tomes.

**3) Declarations of Interest**

Members were invited to declare their interests and consider any requests for  
Grants of Dispensations in accordance with section 9 and Appendix B of the  
Council's Code of Conduct.

No declarations of interest were made.

**4) Items of Information and Matters for Forthcoming Agendas**

There were no matters raised.

**EXCLUSION OF PRESS AND PUBLIC**

It was proposed by Councillor Bonfield, seconded by Councillor Moreton and  
RESOLVED UNANIMOUSLY:-

That, under Standing Order No. 1 c), in the public  
interest, the press and public be excluded from the  
Meeting in view of the confidential nature of the  
business to be transacted under agenda item 5 (due  
to data protection considerations).

**5) To consider whether recent correspondence from person A and person B meets the criteria for vexatious correspondence, as set out in the Vexatious Correspondence and Complaints Policy and/or the Freedom of Information (FOI) Act, and if so to determine the appropriate next steps**

Further to Minute No. 4) of the Vexatious Correspondence and Complaints Policy Sub-Committee meeting held on 7<sup>th</sup> May 2025, and following the review and subsequent adoption of the Town Council's amended Vexatious Correspondence and Complaints Policy, in accordance with its Terms of Reference Members of the Sub-Committee had deemed it necessary to meet to consider recent correspondence, social media activity, and FOI requests received. Some of this material had been experienced by members and officers as confrontational or aggressive.

It was agreed that matters connected with the handling of requests for information under the Freedom of Information Act (FOIA) should be considered separately from the management of other correspondence and complaints. Furthermore, it was agreed that the correspondence received from person A and person B should be considered separately.

**Freedom of Information Act**

Members were informed of advice received on the management of requests under the FOIA from a specialist advisor, whose services had been engaged at nil cost via the Dorset Association of Parish and Town Councils. Given the frequency of requests received and the burden placed on the Council's staff in responding to these matters, Members gave careful consideration as to how these requests should be managed in the future. The importance of striking a balance that ensured that the Town Council continued to meet its legal obligations whilst efficiently managing Council resources and protecting staff welfare was considered at length.

Members raised some potential changes to the Town Council's procedures. Further to Minute No. 5) of the Vexatious Correspondence and Complaints Policy Sub-Committee meeting held on 14<sup>th</sup> April 2025, and the ICO guidance on handling potentially vexatious correspondence, Members raised the question of whether it would be appropriate to apply charges for particularly time-consuming FOI requests, to recover the costs of undertaking this work. This was considered in the context of protecting public funds and safeguarding staff time. It was noted that it would be beneficial to arrange an advice session for Members where proposed changes to current procedure could be considered prior to further deliberations at a future meeting. Members expressed an interest for all Town Councillors to attend this, if possible, as well as data protection training.

Attention was drawn to a number of emailed requests for information that had been sent to Councillors, and it was suggested that these should be forwarded to the Council's central administration inbox for review prior to a response being provided to assess whether they should be dealt with under the FOIA.

A discussion was held regarding the Information Commissioner's Office (ICO) guidance concerning the factors that may be taken into account when determining whether a complaint or pattern of correspondence could be considered vexatious. The Sub-Committee noted the following considerations:-

1. The burden (on the public authority and its staff);
2. the motive (of the requester);
3. the value or serious purpose (of the request); and
4. any harassment or distress (of and to staff).

Having heard personal testimony, Members expressed significant concern about the impact that the volume and tone of enquiries, together with the context of commentary on social media in which they were being made, was having on the health and wellbeing of some Council staff and Councillors.

During the discussion, Members considered whether the Council should begin publishing all FOI requests received (anonymised in accordance with data protection requirements) together with the responses issued, thereby creating a public record of these requests and the information released. Further to Minute No. 5 (a) of the Meeting of the Finance and Governance Committee held on 12<sup>th</sup> November 2025, it was agreed that a draft webpage be developed for this purpose and that all FOI requests received since the beginning of the 2025 Council year should be included. An update on the development of the webpage would be presented to the next meeting of the Finance and Governance Committee.

It was proposed by Councillor Bonfield, seconded by Councillor Moreton and **RESOLVED UNANIMOUSLY:-**

That an update on the creation of a webpage to host a library of Freedom of Information requests and responses issued be provided to the next meeting of the Finance and Governance Committee.

The Town Clerk left the room prior to consideration of the correspondence from person A.

#### Correspondence from Person A

Members undertook a careful review of the schedule of correspondence received from person A from July to November 2025, personal testimony of a member of staff and a Councillor, email correspondence, and a selection of social media posts, with due regard to the provisions of the Council's Vexatious Correspondence and Complaints Policy. Attention was drawn to Policy point 1.1 in relation to these items.

- Two items were considered to meet the criteria to be declared vexatious. These had displayed unacceptable harassing, threatening, bullying, and persistent behaviour. Members further agreed that the manner in which the social media posts had been published across multiple accounts was undermining and did not accurately present the facts of the subject matter. On at least one occasion, these posts had implied that the correspondent was speaking on behalf of Town Councillors, which was not the case.
- Three items displayed unacceptable behaviour, and were considered harassing, obsessive, persistent, and prolific. Although they did not meet the criteria to be declared vexatious, Members agreed that these had had an unacceptable adverse impact on the health and wellbeing of staff members and Councillors.

Following discussion, and in accordance with Policy point 3.1, Members agreed that the two requests deemed vexatious would be refused and that a letter would be issued by the Town Mayor to person A, providing the reasons for this decision.

With regard to the further three items, it was agreed that, in view of the seriousness of this unacceptable behaviour, which the Council would not tolerate, a formal letter would be issued to person A confirming the Council's awareness of these items and

and expressing concern about the impact that these actions had had on the health and wellbeing of staff and Councillors.

Committee Members noted their dismay at the aggressive tone adopted in the communications and agreed that, should such behaviour continue or further incidents occur, additional action would be taken in accordance with Council policy and any relevant statutory provisions.

A discussion was then held regarding the content of Policy Nos. 3 and 4, and a question was raised as to whether the review procedure should be considered by the Sub-Committee at a future meeting.

The Town Clerk re-entered the room.

### Correspondence from Person B

Members then undertook a careful review of the schedule of correspondence received from person B from May to November 2025, and social media posts, with due regard to the provisions of the Council's Vexatious Correspondence and Complaints Policy. Attention was drawn to policy point 1.6 – *Repeated use of social media to criticise Council members or officers which could amount to cyber-bullying*.

Members reiterated significant concerns regarding the adverse impact on staff members and Councillors, including the stress inducing effects of this activity. Some comments had also been deeply personal, which was deemed wholly unacceptable. Members felt that these actions did not represent a proactive or constructive approach to contacting or working with the Council, rather, the correspondence and social media posts appeared continually focused on undermining and criticising the Council, Councillors, and officers, and on seeking to highlight perceived errors or faults.

- Although the correspondence and social media posts had not met the criteria to be declared vexatious at this time, Members concluded that the items displayed wholly unacceptable behaviour and were considered harassing, persistent, undermining, and, at times, distressing. They were also noted to have had an adverse impact on the health and wellbeing of staff members and Councillors. Significant concerns were raised regarding the further adverse, and financial, impact caused by officers being taken away from their daily work duties to address these matters, which at times were very time-consuming. Members agreed that such actions had the potential to be declared vexatious should they continue.

Following discussions, it was agreed that the Town Mayor would issue a formal letter to person B, outlining the impact of their actions and the distress caused to Councillors and staff, as detailed above. The letter would also highlight significant concerns regarding the content of the social media posts and draw attention to Policy points 1.1 and ICO point 4 (under section 1.6), as well as the ICO guidance regarding vexatious and repeated requests. Person B would be advised that, should this unacceptable activity continue, it had the potential to be deemed vexatious, and the Sub-Committee would then reconvene to commence the formal process and determine next steps.

It was further noted that the schedules of correspondence, and details of the social media posts reviewed by Members would be included in the respective letters to persons A and B.

6) **Date of Next Meeting**

It was noted that the date of the next meeting would be confirmed as and when necessary.

The Meeting closed at 6.05 p.m.