



CUSTOMER SERVICE POLICY

Owner	Chief Executive
Author	Governance, Misconduct & Compliance Manager
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Applicable to	Police and Crime Commissioner, all staff within of the Office and Police and Crime Commissioner and those contacting the OPCC.

CUSTOMER SERVICE POLICY

Introduction and Contents

This Customer Service Policy outlines the approach we will take in relation to all aspects of the contact between the OPCC and members of the public.

This policy is broken down as follows:

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OUR APPROACH TO CUSTOMER SERVICE

The organisational vision for staff working within the Office of the Police & Crime Commissioner (OPCC) is:

"A safer, more confident community where policing is effective, victims are supported and crime is prevented through partnership, accountability and innovation"

Providing this service means:

- That correspondence will be dealt with efficiently and effectively. This means policies and procedures will be put in place to deal with different types of correspondence appropriately to ensure that the service given is quick, effective and correspondence is dealt with by appropriate personnel.
- That our responses will be appropriate and clear.
- That we will treat everyone with courtesy and respect.
- That we will be proactive and seek to resolve issues as effectively as we can.
- That members of the public should receive the same level of service from all staff members.
- That we seek to improve our performance in all areas and take personal responsibility for the quality of the service we provide.
- That we are professional and answer complaints, correspondence and requests under the Freedom of Information and other legislation to the relevant standards and best practice. The principles of relevant data protection legislation including the Data Protection Act 2018 is applied to our work.
- We are accountable – our work is visible to the public and withstands scrutiny. Matters which are deemed to be of significant public interest are published on our website. We also publish sufficient information (usually on the website) to allow members of the public to understand the services we provide.
- The staff of the OPCC are passionate about our work and the service we provide to the Commissioner and to the people of Lancashire.

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CORRESPONDENCE

General principles

The OPCC receives correspondence from many different sources. Correspondence includes post, email, phone calls and social media. The general principle is that all correspondence should be replied to in the media that was used for the original contact, unless otherwise indicated to us. However, there are some exceptions where responses are inappropriate or not required.

No response will be made in the following circumstances:

- Letters/emails copied to the Commissioner or the OPCC, which are regarded as for information only.
- Correspondence that is trying to sell or promote a product.
- Unsolicited invitations to national events or conferences which aren't relevant to the work of the OPCC.
- Unsolicited job applications or CVs. Details of our current vacancies are available on our website.
- Correspondence containing comments of a discriminatory nature. We believe that all employees should be always treated with dignity and respect. Staff are entitled to work in an environment free from abuse or harassment.
- Social media comments that are contrary to the moderation rules set out in the Social Media Policy.
- Correspondence received where a contact strategy is in place (see 'Managing Service User Contact' section below).
- Correspondence received in any other language than English.

To ensure that correspondence is dealt with effectively the main routes for correspondence will be either post to:

Office of the Police and Crime Commissioner for Lancashire
PO Box 100, County Hall, Preston, Lancashire PR1 0LD.

Or by email to the general office email account: commissioner@lancashire-pcc.gov.uk or by the feedback form on the website.

In particular for telephone calls or social media contacts:

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- We request that all invitations to the Commissioner be made in writing via the above routes.
- We also ask that requests for complex information, or detailed complaints, are made in writing.
- Calls will not be transferred directly to the Commissioner or Deputy Commissioner, and any request to speak with the Commissioner should be put in writing.
- Data protection principles will be considered when responding to social media, a personal response, e.g. by phone, mail, or email, will be made if it is felt that this is more appropriate and is possible.

Pre-election Period (formerly known as Purdah)

All staff employed by the OPCC are politically restricted and strictly adhere to pre-election guidance in relation to correspondence in the pre-election period.

OPCC correspondence should not contain views, proposals or recommendations in such a way that associates them with, or supports the views expressed by, a candidate, political party, group or association. Proactive events arranged by the OPCC in any pre-election period should not involve anyone likely to be standing in an election.

Reporting a crime or incident

- The OPCC is **not** the appropriate office to report a crime, potential crime or disorder or any other concern that relates to the safety of a person or property.
- This Office is also unable to check the progress of a report you have previously made to Lancashire Police.
- If the OPCC receives any correspondence which should be reported to the Police, they will ask the author to forward their correspondence directly to Lancashire Police or if the matter is serious the correspondence will be forwarded directly to Lancashire Police by the OPCC. Please note that if the matter is considered serious (i.e. we deem there is a risk to yourself or others) the OPCC has a duty to report incidents without the approval of the author.

In an emergency you should always ring 999, and in non-emergency cases you should ring 101.

The OPCC is not, nor should it be treated as an emergency service.

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SERVICE STANDARDS

The following service standards are those expected of the staff or OPCC in dealing correspondence from the public.

Accessibility

- The office will be staffed Monday – Thursday between 9am and 4.30pm and 9am to 4pm on Friday. During these times, the office phone number (01772 533587) will be answered wherever possible.
- If staff have been instructed to work from home due to government guidance in the event of a national emergency or pandemic, the phone line, general email account and social media will continue to be monitored.
- Information will be provided to the public on how to make a complaint. This will include phone, email, website feedback and post. Information will be provided to signpost other relevant organisations involved in complaints handling. Full details can be found within the OPCC Complaints Procedure which can be found on the 'Policies' section of the website.

Response to the public

- All incoming e-mails to the OPCC general account will receive an automated reply on receipt.
- Correspondence will sometimes require staff to do extensive research to find the information requested. This might sometimes take a while before a full response is issued, however we aim to update the service user if this is likely to be more than **20 working days**.
- Social media accounts are reviewed daily, within office hours, and will be replied to as appropriate. Details of the acceptable use of social media are outlined within the Social Media Policy which can be found on the 'Policies' section of the website.
- Replies should be in plain English, with explanations of technical and legal phrases where appropriate.
- Complaints will be handled as outlined within the OPCC Complaints Procedure which can be found on the 'Policies' section of the website.
- The OPCC regrets that we are unable to respond to complaints from members of the public about Lancashire Police unless or until the Lancashire Police's Professional Standards Department (PSD) complaints process has been followed in entirety. Further details are contained within the OPCC Complaints Procedure which can be found on the 'Policies' section of the website.

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- Due to the volume of work the OPCC receives, some correspondence such as requests for research, interviews or information from individuals or bodies outside of Lancashire are regrettably unlikely to be fulfilled.
- The OPCC endeavours to make its services accessible to everyone. If you have a specific requirement, please contact us to discuss how we can help you.

Recording of information

All correspondence (including relevant phone calls) from the public should be logged on internal OPCC correspondence systems.

Please note, telephone recording is not in operation and recordings of calls will not be available.

MANAGING SERVICE USER CONTACT

The OPCC has a responsibility to provide a safe working environment for its staff and to ensure that the service it provides is cost effective and delivered fairly to all. We therefore reserve the right to manage service user contact where necessary, in line with this policy.

In a small number of cases, service users may pursue their complaints or issues in a way that is not acceptable. They may behave unacceptably, be unreasonably persistent in their contact or make unreasonable demands. This can have an impact on the health and safety of staff within the OPCC. It can also have an impact on investigating their complaint or issues or other areas of business.

The OPCC recognises that certain health conditions, forms of mental illness or disability may make it difficult for people to express themselves or communicate clearly. The OPCC always aims to make reasonable adjustments to meet the needs of individuals, however we may still need to manage contact in these circumstances when considered necessary.

The OPCC understands that people may have experienced frustrating or distressing circumstances leading up to contacting the organisation. We do not view behaviour to be unacceptable just because a service user may be frustrated or angry.

However, the behaviour of service users who are angry, demanding or persistent may result in unreasonable demands being placed on staff or in staff bearing the brunt of unacceptable behaviour. Unacceptable behaviour may be isolated to a single incident or form a pattern of behaviour over time. Even if a complaint has merit, a service user's behaviour can still be unacceptable.

It is these actions that the OPCC aims to manage under this policy.

VEXATIOUS AND REPEATED COMPLAINTS

Whilst complaints will be managed, there may be occasions when staff feel it is appropriate to put certain restrictions on contact or to disengage with a service user.

Identified below are some instances where this may be the case, however, is not an exhaustive list:

- The same complaint is made repeatedly and has already been dealt with.
- The complaint relates to matters outside of the PCC's jurisdiction.
- The complaint has been fully investigated and all avenues and reviews exhausted although the complainant will not accept the outcome.
- The complaint is offensive or simply contains the individual's views about another person, with no evidence to support them.

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- The level of contact or amount of information being sent to the Commissioner or OPCC is such that it places an unreasonable burden on staff and affects their ability to carry out their duties.

Where a member of staff feels that a case meets any of the above (or similar) criteria, they will raise it with the Chief Executive who will decide the way forward based on the evidence.

In the case of service user contact relating to face-to-face contact, for example at a meeting or community event, it may on occasion be deemed appropriate to decline requests for physical meetings and instead offer alternative methods of communication or to not engage at all at the discretion of the PCC or Chief Executive, based on threat, harm and risk considerations.

Alternative methods of communication may be, for instance, through offering a telephone/Teams meeting or requesting communication via email/post. This may be necessary in the case of contact (or potential contact) which would fall within one of the definitions outlined in this policy document as being:

- Vexatious and Repeat
- Unacceptable
- Violent, Threatening or Abusive
- Obstructive
- Unreasonable

In the case of correspondence which is deemed of the above nature, the Chief Executive will write to the individual and place parameters around their contact or request that they desist entirely. There may be a legitimate reason an individual is unable to communicate with the OPCC in writing. If this is the case, alternative methods of communication can be used. Reasonable adjustments should be made for anyone with a disability to ensure that all communication is in accordance with Section 20 of the Equalities Act 2010.

Any decisions about restrictions on contact will be shared with staff who will be empowered to handle that individual as outlined within this policy (e.g. in relation to frequency or type of contact).

If the individual persists in contacting the OPCC when they have been told that there is no further action possible, then the Chief Executive will inform them in writing that they will no longer receive a response from the OPCC. All correspondence will be read to ensure that it does not include any new, unrelated matters, however if it relates to the original communication, it will be placed on file.

The OPCC will continue to read all future correspondence and action any new or valid complaints in accordance with our own policies and the relevant legislation.

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VIOLENT, THREATENING OR ABUSIVE BEHAVIOUR

A service user's behaviour is considered unacceptable when these emotions lead to behaviour which the OPCC perceives to be violent, threatening or abusive.

OPCC staff should not endure or tolerate violent, threatening or abusive behaviour. The safety and well-being of staff should always be protected even if the service provided to the service user has fallen short of expected standards.

Violent, threatening or abusive behaviour may involve any or all of the following:

- Verbal abuse, derogatory or discriminatory remarks (written or verbal).
- Harassment, intimidation or threats.
- Threats of harm to person(s) or property.
- Stalking (in person or online).
- Psychological manipulation.
- Oppressive or coercive behaviour.

When unacceptable behaviour takes place during a telephone call, the member of staff should tell the caller their behaviour is unacceptable, set out explicitly why the behaviour is unacceptable and warn them that if the behaviour continues, they will end the call. Staff at all levels are empowered to end telephone calls where they experience threatening or abusive behaviour.

If staff are forced to end a call due to unacceptable behaviour, they should report it to their line manager and seek advice on the appropriate steps to take. A file note should be made and where appropriate attached to a case file, setting out why a call was ended and what other actions were taken.

Threatening and abusive correspondence is also unacceptable and can have a similarly negative effect on the well-being of OPCC staff. Where such correspondence is received, an appropriate contact strategy should be created and recorded.

WHAT IS UNREASONABLE BEHAVIOUR

Unreasonable behaviour is any behaviour that impacts on the ability of staff to effectively do their job and goes beyond someone being assertive or expressing their dissatisfaction. It may be isolated to a single incident or form a pattern of behaviour over time. Even if a complaint or issue has merit, such behaviour can still be unreasonable.

TYPES OF UNREASONABLE BEHAVIOUR AND UNREASONABLE PERSISTENCE

A service user's behaviour may be unreasonable if they continue to write, email or telephone about their complaint(s) excessively (and without providing new information) despite being assured that their complaint or matter is being dealt with or being told that it has been concluded.

While this behaviour may not appear to be as severe as violent, threatening or abusive behaviour, it is considered unreasonable because of the impact it can have on the time and

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resources of staff, which in turn can impact on the capacity to manage other business.

Unreasonable persistence may consist of:

- Persistently calling, writing or emailing to demand updates or answers, despite being assured that matters are in hand and being given reasonable timescales for when an update can be expected; Refusing to accept reasonable explanations following the conclusion of a complaint or matter and/or failing to follow appropriate appeal or review channels where appropriate.
- Contacting different people in the same organisation to try and secure a different outcome.
- The volume or duration of contact impacting on the ability of staff to carry out their functions (this can include calling a number of times repeatedly on the same day).
- Reframing or re-wording a complaint or raised issue that has already been finalised.
- Demanding action or continued contact in relation to issues which have been outlined as being outside of the jurisdiction of the PCC or the OPCC.
- Persisting with the complaint or issue despite failing to provide any evidence to support it after numerous requests to do so.

UNREASONABLE DEMANDS OR OBSTRUCTIVE BEHAVIOUR

This type of behaviour is considered unreasonable because of its impact on the time and resources of the organisation, its services and staff, together with the ability to thoroughly investigate the complaint. It can include:

- Repeatedly demanding responses within an unreasonable timescale or insisting on speaking to a particular member of staff despite being told that it is not possible or appropriate.
- Not following appropriate channels for engagement, despite receiving information more than once about the appropriate channel(s) to use.
- Issuing demands about how their complaint or matters should be handled, despite being told about the process and receiving information or regular updates
- Demands to speak to senior managers at the outset before the member of staff has fully considered the matter.
- Repeatedly copying staff into emails sent to other public bodies where there is no evident reason to do so.
- Refusing to provide information needed to conduct enquiries (e.g., providing relevant information, contact details of witnesses, privately owned CCTV).

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Unreasonable persistence and demands can impact on staff wellbeing. Where a member of staff is required to deal with this type of behaviour, line managers should make sure appropriate support is in place to support their welfare.

UNDERLYING CAUSES

There are many reasons why a service user's behaviour may become unacceptable or unreasonable. Staff should not make assumptions about what is driving the behaviour. Understanding the reasons behind it is vital in deciding how best to manage it.

Frustration caused by poor communication and/or lack of timeliness when handling complaints or issues can cause behaviour to escalate. When unacceptable or unreasonable behaviour is displayed, staff should consider the following:

- Has the OPCC explained the process and checked that they understand it?
- If the matter is ongoing, has the OPCC communicated regularly and effectively with them?
- Has the OPCC asked if they would benefit from additional support? If so, have they received this?
- If the matter relates to an issue outside of the jurisdiction of the PCC or OPCC, has signposting to alternative organisations who may be able to assist the complainant been undertaken?
- If a decision has been made on the matter, have they been given a clear rationale for the decision in a way that they can understand how the decision has been reached?

If the answer is 'Yes' to any of the above questions and the behaviour of the service user is still unacceptable or unreasonable, staff must decide how best to manage it. If these obligations have not been met, steps should be taken to address any shortcomings where appropriate. This may be enough to stop the behaviour.

MANAGING UNACCEPTABLE OR UNREASONABLE BEHAVIOUR

Communicate With The Person

Before taking steps that reduce or restrict communication any issues with behaviour should be addressed with the service user.

The service user should be informed about the issues with their behaviour and why it is considered unacceptable or unreasonable. They should be advised how they can adjust their behaviour. Below are some examples:

- Reminding them that violent, threatening or abusive behaviour will not be tolerated.

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- Summarising the complaint(s)/matter(s) and asking them to confirm that all the issues they have raised have been understood correctly.
- Providing guidance to the service user on the structure their correspondence should follow.
- Signposting the service user to other sources of support if they raise matters that fall outside the OPCC's area of business.
- Appointing a single point of contact responsible for reviewing all their issues to ensure consistency.

When communicating with someone who is behaving in an unacceptable or unreasonable way, staff should be clear about the consequences if the behaviour continues. Where possible they should be given the opportunity to change their behaviour before a decision is taken to restrict contact.

If Necessary, Implement a Contact Strategy

A contact strategy may be implemented if unacceptable or unreasonable behaviour continues. A contact strategy will set out how and when further contact with the individual will take place, any restrictions on communication and the reason for introducing the strategy.

Before introducing a strategy, staff should consider what they are trying to achieve by implementing the strategy and is restricting contact in this way fair, reasonable and proportionate.

The individual should be notified in writing about the strategy (considering any specific needs and reasonable adjustments).

The explanation should emphasise the strategy has been implemented to make sure their issues are dealt with promptly and accurately and that failure to comply with it could delay the handling of their issues or complaint(s).

It must be clear the strategy relates only to that complaint or matter and that assistance in relation to other issues can still be requested as appropriate.

Contact strategies can include:

- Limiting duration of phone calls to specific times (for example, one call on one specified morning/afternoon of any week/month).
- Restricting contact to email or post only (considering any reasonable adjustments) and limiting the volume and words of written communication.
- Using a dedicated email address and auto-diverting emails.
- Requiring the complainant to communicate only with a single point of contact (SPOC).

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- Record details of the contact/correspondence.
- Blocking email addresses or other channels of communication if appropriate.
- Refuse to consider demands to re-open a closed matter or decision.

Regardless of any contact strategy employed, all contact must be reviewed to identify any genuine complaints, issues, criminal matters or safeguarding issues.

Adhering to and Reviewing/Revising the Contact Strategy

Systems should be in place to review any contact strategies on an annual basis. These reviews should make sure the contact strategy is still appropriate and fit for purpose.

The individual should be told about any changes to the contact strategy.

In some circumstances, it may be necessary to share details of the contact strategy with partners, such as Lancashire Police Chief Officers and/or Professional Standards Department (PSD). However, this should only be done when there are legitimate reasons for doing so, in line with the OPCC Privacy Policy which can be found under the 'policies' section of our website.

Further Action

It may be necessary to take further action to protect staff welfare and their ability to support the business of the OPCC if a contact strategy proves to be unsuccessful and the unacceptable behaviour continues despite numerous attempts to adjust the strategy.

In practice this should rarely be necessary and should be reserved only for the most severe cases. In these circumstances, it is best to seek professional or legal advice to explore what legislative avenues are available to deal with the service user's behaviour.

RELATED POLICIES

Complaints Procedure

Complaints regarding the conduct of the Police and Crime Commissioner, or his Deputy, are handled by the Lancashire Police and Crime Panel, administered by Blackburn with Darwen Borough Council.

The Commissioner is responsible for dealing with complaints about the Chief Constable and the Chief Executive of his Office.

The Chief Executive is responsible for dealing with complaints about other members of staff within the OPCC.

Complaints about the Chief Constable will be dealt with in accordance with the guidance issued by the IOPC and the requirements of the Police Reform Act 2002 (and subsequent amendments). There are no equivalent regulations covering the staff of the OPCC but where practical the same standards are applied as would be applied to staff in the Lancashire Police.

Where complaints are received that are the responsibility of a different authority, e.g. complaints about Lancashire Police officers or staff, complainants will be re-directed appropriately.

The full OPCC Complaints Procedure can be found on the 'Policies' section of the website.

Social Media Policy

The Police and Crime Commissioner (PCC) for Lancashire is committed to being as accessible as possible. We use social media to engage with residents across the county, as part of a broader range of communication methods.

Posts can be made by the Commissioner themselves and also by staff acting on the PCC's Behalf.

Social media accounts are established to allow the Commissioner to share information with the public but are also a method that allow the public to contact the Commissioner.

On occasion it may be necessary to moderate content found on the PCC's social media accounts, in line with moderation standards outlined in the relevant policy document.

The full OPCC Social Media Policy can be found on the 'Policies' section of the website.

EQUALITIES STATEMENT

The OPCC aims to handle all complaints, correspondence, social media enquiries, etc. fairly and honestly regardless of who makes a complaint. The OPCC treats all members of the community equitably and will not show bias to any particular individual or group.

The OPCC endeavours to make its services accessible to everyone. If you have a specific requirement, please contact us to discuss how we can help you.