

British Transport Police Authority

Customer Service Standards Policy

Document Owner	Head of Governance and Compliance
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- 1. Policy Statement and Purpose
- 1.1. The British Transport Police Authority ("the Authority) is committed to providing excellent customer service. The Authority will manage all customer contact in a way which is: -
 - Fair
 - Timely
 - Accurate, and
 - Accessible

This policy describes the minimum service standards which the Authority will apply when handling customer contact. It also seeks to promote consistency and proportionality to the delivery of services, to ensure that the Authority's resources are spent adequately and in adherence to its duties and responsibilities. The Authority is continuing with business as usual, however, due to the remote working arrangements in light of Covid-19 there may be a delay in providing a full response to queries.

- 1.2. The method and timescales for handling certain matters are defined by specific legislation (e.g. Freedom of Information, Data Protection, Police Complaints, etc.). Any exceptions are noted in this policy.
 - 2. Definitions
- 2.1. Customer is defined as anyone who comes into contact with the Authority. This may be a member of the public, a private firm, an independent organisation or a public body.
- 2.2. Customer Contact is defined as any type of interaction with external individuals and bodies, which may be in the form of letters, emails, telephone calls and social media platforms.
 - 3. Responsibilities under the Policy
- 3.1. Managers and supervisors are expected to ensure their staff are always fully aware of the contents of this policy and to ensure compliance.
 - 4. Links to other Policies
- 4.1. This policy must be read in conjunction with: -
 - BTPA guidance for relationships with the Media
 - BTPA Member and Staff Complaints Policy
 - BTPA Senior Officer Complaints Policy

- BTPA Publication Scheme
- BTPA FOI Publication Scheme and Data Protection Act Policies
- 5. Procedure for regular customer contact

Letters by Post

5.1. The Authority's postal address is: -

Ivason House 8a London Bridge St London, SE1 9SG

5.2. All incoming and outgoing mail to the above address is logged.

Minimum standards

- We aim to acknowledge letters within ten working days and provide a substantive response within 20 working days of receipt.
- If additional information is required to compile a response, we will keep the sender informed of progress.
- Queries received by post will be dealt with by the most appropriate person. Consequently, replies to letters may come from persons other than those originally addressed.

Exceptions

- The Authority may not reply if it was previously specified that we would not be able to do so (e.g. in the case of consultation responses or job applications).
- The Authority may not reply if the letter was copied for information.
- The Authority will not reply to correspondence that is trying to sell or promote a product.
- The Authority will not reply to speculative job applications.

Emails

5.3. The Authority's main email address is: -

general.enquiries@btpa.police.uk

- 5.4. The general enquiries address is regularly monitored.
- 5.5. Emails containing generic queries but sent to staff email addresses will be dealt with in the same way as if they had been sent to the general enquiries address.

Minimum standards

- We aim to acknowledge all emails to the general enquiries inbox within 2 working days and provide a full response within 20 working days.
- Queries received by email will be dealt with by the most appropriate person. Consequently, replies to emails may come from individuals other than those originally addressed.
- An email may be forwarded to a relevant person to handle the query, in which case we will notify senders of whom it is being sent to. If the email contains sensitive personal information (as defined by the Data Protection Act) the sender's consent will be obtained before this takes place, unless one of the exceptions contemplated in the law applies.

Exceptions

- The Authority may not reply if it was previously specified that we would not be able to do so (e.g. in the case of consultation responses or job applications).
- The Authority may not reply if the email was copied for information (cc) or blind copied (bcc).
- The Authority will not reply to emails that are trying to sell or promote a product.

Telephone calls

- 5.6. Due to Covid restrictions the Authority's temporary number main telephone is 07900 392397
- 5.7. The Authority's office hours are 08.00 to 16.00, Monday to Friday. The offices are closed on bank holidays for England.

Minimum standards

- Within office hours, we aim to answer phone calls within six rings.
- Outside office hours, and on occasions when nobody is available to take the call, messages can be left on the office mobile. We aim to call back those leaving a message as soon as possible, however, due to the remote working arrangements in light of Covid-19 there may be a delay in providing a full response to queries.
- Calls will be handled by the person who is deemed most suitable to answer a query. Authority staff will have discretion to decline transferring a call if this is not deemed appropriate or necessary.
- Authority staff will deal with telephone queries to the best of their ability and will attempt to provide a resolution on first contact. Authority staff may need to seek clarification on issues raised and callers should expect questions as to the reason for the query or intended use of the information provided. For security reasons, staff may require identity and fact verification to progress a query.

Exceptions

- The Authority asks that complex or detailed queries be put in writing, as with Freedom of Information requests (which, in law, must be in writing).
- The Authority asks that all invitations to events be put in writing.
- Complaints against senior officers of the BTP may be taken by phone, although if complex and detailed matters are involved, the Authority may request that these be submitted in writing.

Social Media

- 5.8. The Authority's official Twitter account is @BTPAuthority and has a presence on LinkedIn
- 5.9. The Twitter account and LinkedIn page are monitored during office hours:
 08.00– 16.00, Monday to Friday, excluding bank holidays for England.
 Occasionally the Authority may cover events outside of these hours live on Twitter.

Minimum standards

• The Authority welcomes feedback and ideas from all LinkedIn and Twitter users

and followers. However, the Authority may not be able to reply individually to all tweets or comments.

- Reports of incidents may be retweeted to the BTP's Twitter account @BTP_UKBT if it is deemed appropriate.
- If a Twitter user follows @BTPAuthority, the Authority will not automatically follow back. This also applies to BTPA's LinkedIn page. Being followed by @BTPAuthority or by BTPA on LinkedIn does not imply endorsement of any kind.
- If the Authority agrees to direct message with a user, the Authority will follow the user's profile but may unfollow it afterwards. The Authority may request users to provide an email address to give a full response outside of Twitter character limits or LinkedIn Direct Messaging specifications.

Visits

- 5.10. Due to heightened security measures, the Authority does not receive unannounced visitors to its offices at Ivason House (London Bridge).
- 5.11. Members of the public are welcome to attend the public part of any meeting (including virtually) of the Authority, although those wishing to attend are asked to inform the Authority at least 24 hours before the meeting. This is to allow it to make appropriate security and accessibility arrangements. Members of the public attending meetings are not able to address the Authority during proceedings.
- 5.12. Authority staff may ask visitors to produce a form of ID (Passport, Driving Licence or Staff ID) before they can be seen. All visitors will be asked to sign in.
- 5.13. Any person wishing to personally speak with a member of staff is able to request an appointment by contacting the Authority in advance. The process for submitting a question is explained in the Authority's Code of Governance.

6. Accessibility

Alternative formats

6.1. In line with its publication scheme, the Authority will make available information in Large Print and Braille, where possible. However, there may be a slight delay while the information requested is being prepared in the alternative format. Wherever possible the Authority will advise the customer of the likely length of any delay at the time of responding to the initial request.

Welsh Language

- 6.2. A new set of Welsh Language Standards introduced in 2014 imposed duties on public bodies that operate in Wales.
- 6.3. The Authority made the following commitments to deliver services in the Welsh language, in accordance with specific standards set by Welsh legislation. These remain extant but are under review.

Minimum standards for the provision of services Welsh Language

- When correspondence from a person in Welsh is received, the Authority will reply in Welsh unless the person has indicated that there is no need to reply in Welsh (Standard 1)
- When the Authority has invited a person to a meeting, and that persons wishes to speak Welsh, the Authority will arrange for a simultaneous translation service from Welsh to English to be available (unless it is possible to conduct the meeting without the assistance of translation services). (Standard 24A)
- When the Authority produces documents for public use in Wales, they must be available in Welsh. (Standard 36)
- Any brochure, leaflet, pamphlet or card to provide information for public use in Wales, will be available in Welsh. (Standard 43)
- Policies, strategies, plans, guidelines, codes of practice, consultation papers relating to Wales, will be available in Welsh (Standard 44)
- Other documents which concern activities in Wales will be available in Welsh (Standard 47)
- Bilingual documents will not treat Welsh text less favourably than English text. (Standard 46)
- The English version of Bilingual documents will indicate that a Welsh language

version is available (Standard 49)

- The homepage of the Authority's website will be available in Welsh (Standard 53)
- The Authority will have a Welsh corporate identity (Standard 81)

Other Languages

- 6.4. The Authority will consider requests to provide information and services in languages other than English and Welsh and will attempt to assist in every way possible subject to the availability of resources.
 - 7. Exceptions to the Policy

Media Enquiries

- 7.1. Contact by journalists and researchers from print or broadcast media outlets should be directed to the Stakeholder Engagement and Communications Manager, who will handle the enquiry. All enquiries are logged.
- 7.2. Depending on the nature of the enquiry, the Authority will aim to respond within the deadline stipulated by the inquirer or within 3 hours. Outside office hours, and on occasions when nobody is available to handle the matter, an enquiry may be directed to BTP's Media Relations team.
- 7.3. Due to the limited resources at the Authority, support is not normally offered to trainee and student journalists.

<u>Requests under the Freedom of Information Act and Data Protection Act</u> (Subject Access Requests)

7.4. Requests made under the FOI Act and DPA will be handled in accordance with the relevant legislation and existing BTPA policies.

Complaints against senior officers of the British Transport Police

7.5. Complaints which fall under the scope of the Police Reform Act 2002 will be handled in accordance with the relevant BTPA policy, legislation and IOPC Statutory Guidance.

Complaints against Members or Staff of the Authority

7.6. Complaints against serving Members and existing employees of the Authority will be handled in accordance with the BTPA Member and Staff Complaints Policy.

- 8. Managing unreasonable customer contact
- 8.1. There are occasions when contact with a small minority of customers will need to be managed in accordance with different procedures from the ones described above. These procedures seek to limit the negative impact which unreasonable behaviour may have on the Authority's operations, its resources, and the wellbeing of its staff.
- 8.2. The Authority recognises that some customer contact will arise from unsatisfactory, even frustrating situations. However, there can be no justification for aggressive or disruptive behaviour, or for deliberately abusing the functions of the Authority. A description of the scenarios which will lead to the use of these procedures is provided below. The Authority Chief Executive may determine additional scenarios which would warrant the use of these procedures.

A. Aggressive, hostile or disruptive behaviour

- 8.3. Behaviour which include the following is considered aggressive, hostile or abusive, and will not be tolerated in any circumstance: -
 - The use of foul language deliberately to insult or cause offence
 - Threats of physical violence, bullying or harassment
 - Making use of communication with an intent to irritate or disrupt (e.g. making calls in quick succession, sending a high volume of emails, etc.)
- 8.4. The Authority will <u>limit</u> or <u>refuse</u> customer contact fitting these criteria. The Authority may also assess whether to report any incident to the police, and this might be done without warning given to the customer.
 - B. Discriminatory, oppressive or unlawful behaviour
- 8.5. The Authority will limit or refuse customer contact: -
 - If the content of communication is derogatory or discriminatory against any race, background, faith, gender, age, disability or sexual orientation.
 - If the content of communication is clearly malicious or oppressive, i.e. if it targets individuals due to their history, profession, interests, political affiliation, etc. with an intention to cause wrongful treatment.
 - If the content of communication contains unlawful material or conceals, promotes or condones criminal activity.
 - If the communications seek to exert any form of undue influence, either through bribery, blackmail or intimidation.

8.6. The Authority may also assess whether to report any correspondence to the police, and this might be done without warning being given to the customer.

C. Manipulation and misuse of the Authority's resources

- 8.7. The Authority may <u>limit</u> or <u>refuse</u> customer contact which places excessive demands on the time and resources of staff. Examples of these may include: -
 - If a customer makes unreasonable demands about timescales and volume of information.
 - If a customer makes unreasonable and unjustified demands about the way in which customer contact should be maintained.
 - If a customer demands excessive time and attention to be diverted to an issue which is regarded as frivolous or is not an Authority function.
 - If a customer is suspected of deliberately manipulating Authority services for personal benefit. This may include requests for information and advice in pursuit of commercial interests or personal legal matters.
 - If a customer is suspected of misusing Authority processes to progress disputes where other courses of action are available. Where possible, the Authority would advise customers about how to access other services.
 - If a customer insists that a query should be progressed in a way which is incompatible with procedures or good practice.

D. Persistent customer contact

- 8.8. If the Authority is satisfied that all reasonable avenues are being (or have been) exhausted to deal with a customer's query, the Authority may <u>limit</u> or <u>discontinue</u> customer contact: -
 - If the customer is refusing to accept a decision made on a case and is seeking a review by way of repetitive contact with one or several members of the Authority's staff.
 - If the customer is refusing to accept an outcome and **deliberately** alters facts, statements and grounds for the dispute, or introduces trivial new information in an attempt to revive the dispute.
 - If the customer is refusing to accept that an issue is not within the remit of the Authority.
 - E. Vexatious, fanciful and falsified communication

- 8.9. The Authority may <u>limit</u> or <u>refuse</u> customer contact: -
 - If the content of communication is unintelligible or has no meaning.
 - If the customer has not provided details to allow a reply or is refusing to cooperate in solving the query.
 - If the customer is contacting the Authority with an obvious intent to vex, annoy, embarrass or cause unnecessary worry.
 - If the content of communication is fanciful, i.e. if no reasonable person can lend credence to it. (However, an 'improbable' scenario will not automatically be considered fanciful.)

Procedure

- 8.10. The decision to manage customer contact under these procedures will be taken in the most serious of cases, and only after consideration of: -
 - the impact which continuing to engage with the customer is having on the day-to-day business of the Authority, and on the service which it must provide to other customers; and
 - the impact which any restricted access the Authority's services will have on the customer.
- 8.11. The Authority will also consider whether the inappropriate behaviour of a customer has arisen due to circumstances which could be considered exceptional, such as: -
 - acting out of character at a time of stress, anxiety, or distress
 - a health condition which makes effective communication difficult
 - the use of prescription drugs which cause similar effects
 - a learning difficulty which hinders positive formal social communication.
- 8.12. The decision to instigate these procedures will ultimately be taken if one of scenarios in the sections A E is met, and the Authority Chief Executive is satisfied that no exceptions apply.

Unreasonable customer contact procedure – written correspondence

The customer will be notified in writing (or an alternative accessible format) that their behaviour is deemed unacceptable and that, because of this, the Authority has

made a decision to manage their contact with them using special procedures.

Mechanisms for managing customer contact in this case will include: -

- 1. Restricting contact to one particular method of communication which, by default, will be by post.
- 2. Restricting contact to one named officer, and that all communication received by others will be automatically transferred.
- 3. Informing the customer that further incoming correspondence will be read and filed but that a response will only be sent once a matter has reached an outcome.
- 4. Informing the customer will not have an opportunity to continue to engage over a specific matter after a certain point (e.g. once an outcome has been reached).
- 5. In extreme cases, such as the scenarios in sections A and B (aggressive and discriminatory behaviour), informing the customer that all communication will be refused.

Unreasonable customer contact procedure – telephone calls

Wherever possible, all contact with customers under these special procedures will be done in writing. However, if the only method of communication is by phone, the mechanisms for managing the contact may include: -

- 1. Restricting contact to one named officer and advising the customer that phone calls received by others will be automatically transferred.
- 2. Restricting telephone conversations to specific days and times of the week, and placing time limits (e.g. 15 minutes maximum)
- 3. Recording or ensuring that a second member of staff is monitoring the call for fact verification.
- 4. In extreme cases, such as the scenarios in sections A and B (aggressive and discriminatory behaviour), informing the customer that all communication will be refused. In case of disruptive use of phone calls, staff will answer the call but not engage the customer and instead a read a specific message before terminating the call, e.g.

"You have already been provided with advice and all avenues have now been exhausted to assist you. It is not reasonable or necessary for us to continue to speak with you about this. I will now terminate this call".

The Authority will not normally screen out phone calls although in severe circumstances a phone number may be blocked.

9. Monitoring and Reviewing this Policy

9.1. The policy will be subject to review on a triennial basis.

10. Contact Details

British Transport Police Authority Ivason House 8a London Bridge Street London SE1 9SG

Telephone: 07900 394397 general.enquiries@btpa.police.uk