

Service Adjustment Operating Procedure

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Key messages

- This operating procedure provides guidance on making reasonable adjustments to support the needs of our customers
- It should be read in conjunction with the ICO [Reasonable Adjustments Policy](#).

Does this procedure relate to me?

This procedure is relevant for all staff within the Public Advice and Data Protection Complaints Services.

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1. Introduction

- 1.1. We are committed to making adjustments to our services to meet the needs and enhance the experiences of our customers.
- 1.2. This commitment also encompasses our legal obligations under the Equality Act 2010 to make reasonable adjustments to our services for customers with a disability.
- 1.3. Agreeing adjustments to our services requires a positive working relationship with our customers wherever possible, and for staff to be supported in applying their judgement.
- 1.4. We will do our best to satisfy the customer needs for a reasonable adjustment but in doing so we remain committed to ensuring staff are not subjected to unacceptable customer behaviour.
- 1.5. If a customer exhibits difficult, unacceptable or persistent behaviour whilst a reasonable adjustment is being considered then we will establish whether this is directly related to any disability, or any other personal circumstances.

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2. Our approach to service adjustments

- 2.1. Establish whether a reasonable adjustment is required.
- 2.2. Agree what the adjustment should be and clearly communicate this to the customer.
- 2.3. Ensure that a record is made of the reasonable adjustment so that other staff are aware of this in the future.
- 2.4. Ensure that the reasonable adjustment is made.
- 2.5. Check with the customer that the reasonable adjustment has been effective and adjust further if reasonable to do so.

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3. Establishing the requirement for a reasonable adjustment

- 3.1. In most cases the customer will inform us that they require assistance. However, some customers will not ask for it so there needs to be a simple and consistent way of identifying whether an adjustment is required.
- 3.2. Staff should be alert to any situation which indicates that a customer may be finding it difficult to use our services.
- 3.3. The most straightforward way is to ask the customer if any assistance is required. Explain how we would normally deal with adjustments and offer any additional help which may be required.

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4. Agreeing the reasonable adjustment

- 4.1. The first step in agreeing a reasonable adjustment should be to ask the customer what they think would help.
- 4.2. In many cases we will be able to respond immediately – for example, a customer who has difficulty hearing may simply request that we speak more slowly, clearly and loudly than we normally would. In these circumstances if you are confident to simply adjust our service/your approach you should do so.
- 4.3. In other cases, we may need to explore with the customer what we can reasonably do in relation to their specific circumstances.

For example, a customer with literacy difficulties may request a face to face meeting so that a staff member can record their case details, but we might offer instead to take down the details over the telephone and read them back to the customer for agreement.

- 4.4. Where we need to provide translation services staff should refer to the [ICO Translations Policy](#) and the [translation](#) internal information for assistance.
- 4.5. We should always consider whether customer requests are reasonable in the circumstances. Where staff are unsure whether an adjustment should or can be agreed, a 'Service Adjustment Case Conference' should be arranged with support from your line manager.
- 4.6. In any circumstances where an adjustment cannot be agreed immediately staff should explain to the customer that they will need to seek advice and will contact the customer again when they have done so; that should normally be within 48 hours.
- 4.7. All formally agreed service adjustments should be notified to the Head of Public Advice & Data Protection Complaints Services, irrespective of whether they have been consulted when the adjustment was agreed. They will ensure that adjustments are monitored regularly for consistency and that guidance and procedures for staff are regularly reviewed. The Head of Customer Contact is also available to attend any service adjustment case conferences where their guidance or support is needed.
- 4.8. Where we cannot agree a service adjustment with a customer, we should explain why we are unable to do as they request and state clearly what adjustment(s) we are prepared to make. We should also explain that the customer has the right to complain about the issue under our [Service Complaints Procedure](#), and we should provide any assistance necessary to enable them to do so. However, as it is possible that customers seeking service adjustments may have at least some difficulty communicating with us in writing, we should always first consider whether any service complaint can be dealt with by telephone.
- 4.9. Wherever it is practical, the outcome of a customer's request for a service adjustment should be communicated to them separately from the matters they are raising with the ICO and we should agree any necessary adjustments before beginning to consider

these matters. Where a customer requests an adjustment to our service mid-way through our dealings with them, you should deal with the adjustment request before continuing to deal with the matters the customer has raised and communicate the outcome clearly and separately (in a specific letter, email or phone call) where practical.

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5. Recording the reasonable adjustment

- 5.1. The person who agrees the adjustment is responsible for documenting the details. These details should be added to the relevant [Managing Customer Contact](#) section of ICON and the Head of Customer Contact should be notified that a new record has been created.
- 5.2. When a record is created a review date should be added. This may vary based on the customer's dealings with us but in general terms if an adjustment has been agreed for what we understand to be a permanent level of support the record would be set for review at least every two years.
- 5.3. If an adjustment is made in real time for a one off transaction - for example, if a member of staff is asked to speak more clearly/loudly when dealing with someone on the telephone, no specific record need be created if there is no reason to believe that the customer requires us to make adjustments for them prior to any future contact with our office.
- 5.4. A flag should also be raised in our case management system against a customer's details where an adjustment has been agreed so that any other staff dealing with the same customer are alerted to the agreed adjustment.
- 5.5. Our [Managing Customer Contact](#) records are accessible to all staff but will be maintained and coordinated by the Customer Contact department. Where the person agreeing the adjustment is not a member of the Customer Contact department the steps in this procedure should be followed but if a 'Service Adjustment Case Conference' is arranged with the Head of Customer Contact you should also inform your department head in case they wish to attend.

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6. Making the reasonable adjustment

- 6.1. Where the adjustment is relatively straightforward and can be made immediately, this should be done.
- 6.2. Where additional resources and approvals are necessary, a timescale for the arrangements should be agreed with the approving manager and the customer and adjustment details added to the records described in Section 5 above.
- 6.3. You should also notify any other staff who you believe may be dealing with the customer and who may not routinely check our Managing Customer Contact records before their next contact with the customer. Although it is important that we treat the details of adjustments we make for customers sensitively we should be confident to share them with colleagues for the purpose of ensuring they are applied consistently.

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7. Checking the effect

- 7.1. Clearly, an adjustment is only reasonable and helpful if it improves the customer's access to and experience of our service in the way that we had intended/expected. As soon as is practical after the adjustment has been made, we should check with the customer that it was effective and achieved the agreed outcome.
- 7.2. Where the need for a further adjustment or amendment is identified, it should be progressed in accordance with this procedure.
- 7.3. In addition, when a customer's service adjustment record comes up for review, contact should be made with them by the appropriate person with support from a member of the Public Advice & Data Protection Complaints Services department to review both the suitability of the adjustment we have in place as well as the on-going need for it.

- 7.4. If an adjustment is no longer required details should be removed from our systems and a simple note retained confirming the date on which the customer requested / confirmed this to be the case.

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8. Governance and oversight

- 8.1. The Head of Public Advice & Data Protection Complaints Services is responsible for the application of this operating procedure and will review the procedure and monitor its application. Managers unsure about any aspect of the application of this operating procedure should consult the Head of Public Advice & Data Protection Complaints.
- 8.2. When adjustments for customers are communicated in writing they should be signed off by a Case Officer, Lead Case Officer or Team Manager based on the person who is in contact with the customer. If a customer appeals against any adjustment agreed a 'Service Adjustment Case Conference' should be arranged with the Head of Public Advice & Data Protection Complaints Services who will then decide how the review should be handled and who should be responsible for its sign off under our [Service Complaint procedure](#).
- 8.3. If a member of staff becomes aware that an agreed adjustment has not been applied they should bring this to the attention of their manager/managers in their Group. The Head of Public Advice & Data Protection Complaints Services should then be notified and will decide if any internal review of processes or actions is required on a case by case basis.

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Feedback on this document

If you have any feedback on this document, please email the [PADPCS Guidance and Policy Group](#).

Version history

Version	Changes made	Date	Made by
1.0	Moved existing copy to this template	03/05/2024	Alison Fletcher

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