



Information Commissioner's Office

Operating procedure

ICO Service adjustments: customers

1. Purpose

- 1.1 This operating procedure provides guidance to managers and staff which will help them to make reasonable adjustments to our services to support the needs of our customers. It should be read in conjunction with the main [ICO Reasonable Adjustment Policy](#) which sets out our legal responsibilities and general approach more broadly. Other relevant policies are the [ICO Translations Policy](#) and our [Managing Customer Contact](#) operating procedure.

Agreeing adjustments to our services requires a positive working relationship to be established with our customers wherever possible and for staff to be supported in applying their judgment in line with some guiding principles and with reference to any precedent. The following information is intended to support this approach.

2. Guiding principles

- 2.1 We are committed to making adjustments to our services to meet the needs and enhance the experiences of our customers.
- 2.2 This commitment also encompasses our legal obligations under the Equality Act 2010 to make reasonable adjustments to our services for customers with a disability
- 2.3 While we will always do our best to satisfy reasonable customer needs, we remain fully committed to ensuring that our staff should not be subjected to unacceptable customer behaviour. Where we are dealing with a customer who needs a service adjustment but who may also be exhibiting difficult, unacceptable or persistent behaviour, our first response should be to consider whether the behaviour is directly related to any disability or any other personal circumstances which may be influencing the customer's behaviour.

3. Approach

- 3.1 Our approach to service adjustments should be as follows:
- i. establish whether a reasonable adjustment to service is required;
 - ii. agree what the adjustment should be and communicate this clearly to the customer;
 - iii. ensure that a record is made to alert other staff who deal with the customer in the future;
 - iv. make the adjustment; and

- v. check with the customer that the adjustment has been effective and adjust further if reasonable to do so.

These steps are set out in more detail below.

4. Establishing the requirement

- 4.1 In most cases a customer will alert us, at the start of our relationship, that they require some assistance when dealing with us. However, some customers who need additional support may not ask for it, and we therefore need a simple and consistent way of identifying whether an adjustment to our service is necessary.
- 4.2 You should be alert to any situation which may indicate that a customer may be finding it difficult to use our services and be prepared to offer help if appropriate to do so. The most straightforward way to do this is simply to politely ask the customer if any assistance would be helpful during an initial conversation. We should explain how we would normally deal with the issue the person is raising and offer any additional help which may be required.

5. Agreeing the adjustment

- 5.1 Most people who need additional support already have a good idea of what will help them to access the same level of service provided to others. The first step in agreeing the adjustment should therefore be to ask them what they think would help.
- 5.2 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. But 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.
- 5.3 Where we need to provide translation services, staff should liaise with the Corporate Affairs department, who will be able to provide the necessary support. Please also ensure that you refer to the [ICO's Translation Policy](#).

- 5.4 While we should always listen to customer requests, we must also consider whether they are reasonable in the circumstances. Where staff or managers are unsure whether a particular adjustment should or can be agreed, a 'Service Adjustment Case Conference' should be arranged with support from your line manager.
- 5.5 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.
- 5.6 All formally agreed service adjustments should be notified to the Head of Customer Contact, 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.
- 5.7 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.
- 5.8 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.

6. Making a record

- 6.1 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. 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. 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.

- 6.2 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.
- 6.3 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.

7. Making the adjustment

- 7.1 Where the adjustment is relatively straightforward and can be made immediately, this should be done. 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 6 above. 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.

8. Checking the effect

- 8.1 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.

- 8.2 Where the need for a further adjustment or amendment is identified, it should be progressed in accordance with this procedure. 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 Customer Contact department to review both the suitability of the adjustment we have in place as well as the on-going need for it. 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.

9. Governance and oversight

- 9.1 The Head of Customer Contact 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 Customer Contact.
- 9.2 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 Customer Contact who will then decide how the review should be handled and who should be responsible for its sign off under our [Service Complaint procedure](#).
- 9.3 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 Customer Contact should then be notified and will decide if any internal review of processes or actions is required on a case by case basis.