



Customer Engagement Management Policy

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CUSTOMER ENGAGEMENT MANAGEMENT POLICY

Purpose

The Queensland Building and Construction Commission (QBCC) strives to provide exceptional levels of customer service in the delivery of its statutory functions and services to the community.

The QBCC has adopted the Code of Conduct for the Queensland Public Service, which is based on the public sector ethics principles outlined in the *Public Sector Ethics Act 1994*. All QBCC staff are subject to the Code of Conduct and must uphold the highest standards of professionalism, integrity, honesty and customer service.

The QBCC also has an obligation to provide a safe and healthy workplace for its employees, and recognises that there is an element of risk when dealing with some customers. On rare occasions customers can behave in an abusive, aggressive, intimidatory or potentially violent way.

In this instance, the QBCC reserves the right to take appropriate action to manage a customer's impact on the wellbeing or safety of its staff or the organisation by considering imposing access restrictions or alternative service arrangements.

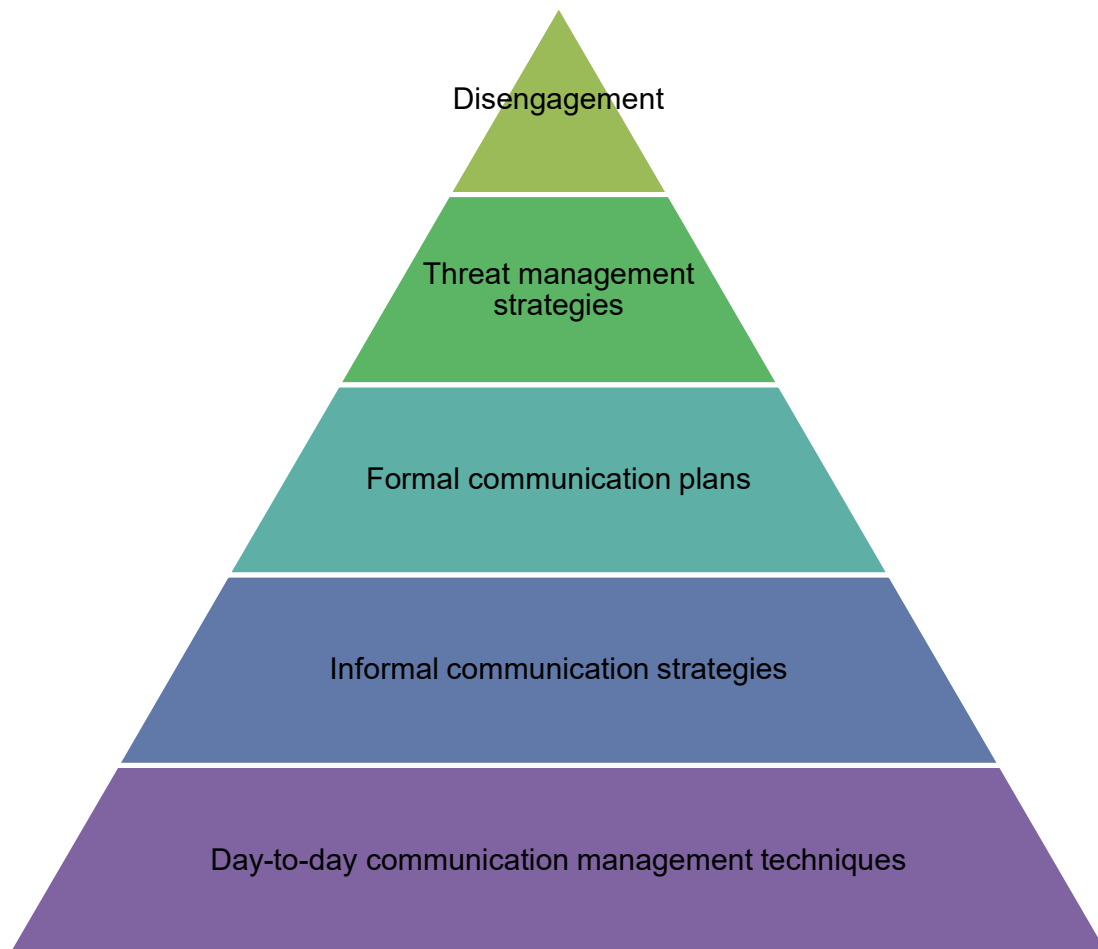
The Commissioner is committed to ensuring all staff who interact with members of the public are aware of their responsibilities and are adequately supported in the event of unreasonable behaviour. This policy aims to balance public accessibility to QBCC services and staff security.

Scope of this Policy

The QBCC communicates with customers across a wide range of circumstances including telephone, email, written correspondence, and social media. The QBCC also engages face-to-face with our customers at our offices, on building sites or at various community meetings, educational functions and so forth.

As illustrated in the below diagram, QBCC staff employ a range of techniques and strategies to manage their interactions with customers, ranging from the day-to-day use of practical communication management techniques and informal communication strategies, to formal communication management plans and disengagement strategies.

These approaches and any required processes are described in more detail below.



Guiding Principles

Behavioural standards

All QBCC staff are subject to the Code of Conduct. QBCC staff are expected to behave in a courteous and respectful manner, deal with customers fairly and equitably, and communicate effectively.

Accordingly, the QBCC has a reasonable expectation that customers should treat QBCC staff with courtesy and respect.

Workplace Health & Safety

The QBCC is committed to ensuring, so far as is reasonably practicable, a safe and healthy working environment for its staff, and that the health and safety of visitors to QBCC workplaces is not affected by the way QBCC conducts its business. Staff safety and wellbeing are paramount when dealing with unreasonable customer conduct. The QBCC recognises that providing a safe and healthy working environment includes consideration of physical, psychological, biological and mechanical hazards and risks.

Right to Access

In the absence of very good reasons to the contrary, all customers have the right to access public services. The decision to restrict or change a customer's access to services because of their behaviour will only be made at a senior management level in accordance with this policy and the associated procedures.

The QBCC will explore the most appropriate access/contact restrictions or alternative servicing before deciding to withdraw face-to-face contact. Consideration must be given to the customer's communication challenges arising from disability, geographical location, language barriers or educational disadvantage to ensure appropriate action is taken.

Fairness and Equity

All complaints are considered on their merits and unreasonable conduct does not preclude there being a valid issue. A customer's complaint should be impartially investigated, and where there is unreasonable conduct associated with a complaint, the unreasonable conduct should have no impact on the investigation of a matter.

If a customer has had access or service restrictions imposed due to conduct issues in the past, these matters should have no bearing in relation to future dealings with the QBCC where the restrictions have been lifted.

Resourcing

QBCC deals with a high volume of work every day, across all its functions, and must allocate and prioritises resources accordingly. The substance of a complaint will determine the level of resources dedicated to it, not a customer's demands or behaviour.

Training

The QBCC Senior Leadership Team will ensure that relevant systems, policies and procedures are in place to manage unreasonable conduct, and that all staff who interact with unreasonable customers will receive training, guidance and direction about what management strategies could be implemented.

Transparency

QBCC staff are to make appropriate records addressing all actions taken following an incident involving threats, aggressive behaviour or violence. QBCC Managers are to ensure that the decision-making process leading up to the imposition of access restrictions or alternative service arrangements is transparent.

Customers who are the subject of access restrictions or alternative service arrangements are to be properly notified of the decisions made, and the review process available to them.

Monitoring

Appropriate monitoring/review mechanisms are to be implemented by the relevant managers to ensure consistency in the application of access restrictions and alternative service arrangements.

Day-to-day communication management techniques

QBCC staff are empowered and encouraged to use practical techniques to manage their communications with customers so as to ensure, as far as possible, that interactions are positive and productive. Such techniques include (but are not limited to):

- Setting boundaries and managing expectations right from their first contact with a customer
- Setting reasonable parameters for when/how often the staff member will respond to a high number/frequency of contacts from a customer
- Promptly warning about, and explaining the consequences of, customers using inappropriate volume, tone or language
- Where customers do not reasonably cooperate with relevant processes, pausing progression of their case until they do
- Terminating or deferring unproductive or circular conversations

- Asking customers to put their questions or concerns in writing
- Referring customers to their complaint and/or review avenues rather than continuing to debate issues
- Refusing to engage further with customers on particular issues once addressed and complaint and review avenues have been explained
- Responding to threats of suicide or self-harm in accordance with the *Responding to People Threatening Suicide or Self-harm Procedure*.

More information about appropriate communication management techniques can be found in the [Managing Unreasonable Complainant Conduct Practice Manual \(2nd edition\)](#).

Staff do not require specific authorisation to employ these techniques with particular customers.

However, staff are expected to ensure that proper records are made of conversations, particularly where the conversation has not been audio-recorded. The more difficult the conversation is, the more detail that should be included in the record of the conversation.

Customers who are unhappy with the way that a QBCC staff member has managed their contacts can lodge a complaint through QBCC's complaint management system (details provided below).

QBCC staff should readily advise customers of their complaint avenues (and make records of this), and should forward any written complaints that they receive directly to the Integrity and Complaints Branch.

Informal communication management strategies

Where day-to-day communication management techniques prove insufficient to maintain positive and productive interactions with customers, QBCC staff should consult with their line managers about implementing further informal communication management strategies. Such strategies may include:

- The manager writing to the customer to reinforce the staff member's communication management techniques
- Suspending action on a matter until the customer commits to courteous communication
- Refusing to send a staff member to inspect a property, and/or refusing to conduct an inspection in a customer's presence, and inviting the customer to provide relevant evidence and information through alternate means
- Requesting a customer to restrict their contacts to a particular method (eg only in writing, or not in person etc)
- Requesting a customer to work directly with a single point of contact
- Advising the customer of the consequences of non-cooperation
- Reiterating advice concerning the customer's avenues for complaint and review, and confirming that staff will not engage further on particular issues that have already been addressed.

More information about appropriate communication management techniques can be found in the [Managing Unreasonable Complainant Conduct Practice Manual \(2nd edition\)](#).

Managers do not require specific authorisation to implement these informal strategies with particular customers. As a general rule, the implementation of such strategies should be communicated, or at least confirmed, in writing.

Complaints and review

Customers who are unhappy with the implementation of such informal communication management strategies can lodge a complaint through QBCC's complaint management system (details provided below).

QBCC staff should readily advise customers of their complaint avenues (and make records of this), and should forward any written complaints that they receive directly to the Integrity and Complaints Branch.

Formal communication management plans

Where informal communication management strategies prove insufficient to maintain positive and productive interactions with customers, team managers may seek approval to implement a formal communication management plan.

A formal communication management plan is not required in all circumstances where informal communication management strategies have proven insufficient to maintain positive and productive interactions with customers. Some unproductive behaviours carry their own natural consequences. For example, an unreasonable failure to cooperate with a decision-making process may lead to an application being treated as withdrawn, or refused.

A formal communication management plan typically involves an enforceable restriction on how, when or with whom a customer can communicate with QBCC, for example, a direction:

- Not to attend QBCC premises in person
- Not to further contact specific QBCC staff members
- To only contact specific QBCC staff members
- To only contact QBCC in a specified manner (eg in writing)
- To only contact QBCC through an authorised intermediary or representative.

Managers wishing to implement a formal communication management plan are strongly encouraged to consult with the Integrity and Complaints Branch at an early stage in the process.

Before seeking approval to implement a formal communication management plan, team leaders must be satisfied, on the basis of the information available at that time, that:

- the behaviour is unreasonable, ie poses a risk to the health, safety, equity or resources of QBCC, its staff, or one of the other parties involved in the case
- all alternative strategies have been, or are likely to be, ineffective in managing the risk
- all relevant factors have been considered including information known to QBCC about the person's personal circumstances and the impact of limiting communication on the person
- the limits on communication are proportionate to the level of risk posed by the behaviour
- the limits on communication are consistent with our obligations under the *Queensland Building and Construction Commission Act 1991*, the *Anti-Discrimination Act 1991*, and the *Human Rights Act 2019*, and
- If the proposed restrictions will adversely affect the person's human rights, that the limits are reasonable and demonstrably justified under Part 2, section 13 of the *Human Rights Act 2019*

In most cases, a customer should be given fair warning that implementing a formal communication management strategy is being considered, and an opportunity to change their behaviour, before a formal communication strategy is implemented.

Implementing a formal communication plan

A formal communication management plan must be:

- Approved by an SES-level officer (typically the relevant SLT member)
- Communicated in writing to the customer

- Stated to last for a defined or definable period of time (eg until a decision on an application is made)
- Accompanied by information about the customer's complaint and review rights.

Complaints and Review

Customers who are unhappy with a decision to implement a formal communication management strategy may apply to have the decision reviewed. Requests for review should ordinarily be made in writing, and must set out the grounds on which the customer believes the strategy to be unreasonable or unfair.

Customers should address their requests for review to:

The Manager, Integrity and Complaints Branch
Queensland Building and Construction Commission
GPO Box 5099
BRISBANE QLD 4001

Email: Integrity@qbcc.qld.gov.au

QBCC can also review a formal communication management strategy at any time, on its own initiative.

Reviews will be conducted by an officer at least as senior as the SES officer who approved the strategy. The outcome of the review will be communicated to the customer in writing.

Formal communication management plans should not be formulated, or implemented, in ways that unreasonably restrict a customer's ability to access QBCC's complaints management system. However, the Integrity and Complaints Branch will typically then implement complementary informal or formal communication management strategies.

Threat Management Strategies

While it is understandable that customers may at times be upset and angry, the QBCC will not tolerate abuse or threats, or physical aggression towards its staff, and will take appropriate action if this occurs. Appropriate strategies include:

- Immediately terminating face-to-face interactions or telephone calls
- Directing a customer to leave QBCC premises, and calling the police if the person refuses to do so
- Reporting all threatened, attempted or actual applications of physical force to a QBCC staff member (or another customer) to the police
- Reporting any use of a carriage service to menace, harass or offend to the police
- Applying to a court for a Peace and Good Behaviour Order.

All staff are empowered to employ such strategies as necessary. In all cases (with the exception of simply terminating a telephone call), a WHS incident form must be completed. Ordinarily, implementing a formal communication management plan should also then be considered (if one is not already in place), or reviewed (if one is already in place).

Threats by customers of suicide or self-harm should be responded to in accordance with the *Responding to People Threatening Suicide or Self-harm Procedure*. In such cases, consideration should also be given to whether a formal communication management plan should be implemented or reviewed.

Disengagement

In extreme situations, the QBCC may choose to disengage with a customer, for example where the customer:

- is consistently abusive, harasses or stalks a staff member

- is physically violent or causes property damage while on QBCC premises
- makes threats to staff or other members of the public while on QBCC premises
- produces a weapon or makes bomb threats
- entraps a QBCC staff member in their home or at a building site or is otherwise violent during a site visit
- engages in conduct that is otherwise unlawful.

The decision to disengage with a customer is made by the Commissioner, who will communicate their decision and reasons in writing.

Customers have the right to complain to the Queensland Ombudsman about a disengagement decision, and information about this should be included in the notice of decision.

Useful links

Managing Unreasonable Conduct – Fact Sheet -

<https://qbcc.sharepoint.com/policies/Documents0/Unreasonable%20conduct%20fact%20sheet.pdf#search=unreasonable%20conduct>

Proposed Management Strategy – Unreasonable Conduct Form -

<https://qbcc.sharepoint.com/policies/Documents0/Proposed%20Management%20Strategy%20-%20Unreasonable%20Conduct%20Form.pdf#search=unreasonable%20conduct>

Unreasonable Conduct and Disengagement Process and Procedure – Fact Sheet-

<https://qbcc.sharepoint.com/policies/Documents0/Managing%20Unreasonable%20Conduct%20Process%20Procedure.pdf#search=unreasonable%20conduct>

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