



Centrelink

ARRANGEMENTS FOR THE WITHDRAWAL OF FACE-TO-FACE CONTACT WITH CUSTOMERS

AUGUST 2008

Report by the Commonwealth Ombudsman,
Prof. John McMillan, under the *Ombudsman Act 1976*

REPORT NO. **09|2008**

Reports by the Ombudsman

Under the *Ombudsman Act 1976* (Cth), the Commonwealth Ombudsman investigates the administrative actions of Australian Government agencies and officers. An investigation can be conducted as a result of a complaint or on the initiative (or own motion) of the Ombudsman.

The *Ombudsman Act 1976* confers five other roles on the Commonwealth Ombudsman—the role of Defence Force Ombudsman, to investigate action arising from the service of a member of the Australian Defence Force; the role of Immigration Ombudsman, to investigate action taken in relation to immigration (including immigration detention); the role of Postal Industry Ombudsman, to investigate complaints against private postal operators; the role of Taxation Ombudsman, to investigate action taken by the Australian Taxation Office; and the role of Law Enforcement Ombudsman, to investigate conduct and practices of the Australian Federal Police (AFP) and its members. There are special procedures applying to complaints about AFP officers contained in the *Australian Federal Police Act 1979*. Complaints about the conduct of AFP officers prior to 2007 are dealt with under the *Complaints (Australian Federal Police) Act 1981* (Cth).

Most complaints to the Ombudsman are resolved without the need for a formal report. The Ombudsman can, however, culminate an investigation by preparing a report that contains the opinions and recommendations of the Ombudsman. A report can be prepared if the Ombudsman is of the opinion that the administrative action under investigation was unlawful, unreasonable, unjust, oppressive, improperly discriminatory, or otherwise wrong or unsupported by the facts; was not properly explained by an agency; or was based on a law that was unreasonable, unjust, oppressive or improperly discriminatory.

A report by the Ombudsman is forwarded to the agency concerned and the responsible minister. If the recommendations in the report are not accepted, the Ombudsman can choose to furnish the report to the Prime Minister or Parliament.

These reports are not always made publicly available. The Ombudsman is subject to statutory secrecy provisions, and for reasons of privacy, confidentiality or privilege it may be inappropriate to publish all or part of a report. Nevertheless, to the extent possible, reports by the Ombudsman are published in full or in an abridged version.

Copies or summaries of the reports are usually made available on the Ombudsman website at www.ombudsman.gov.au. Commencing in 2004, the reports prepared by the Ombudsman (in each of the roles mentioned above) are sequenced into a single annual series of reports.

ISBN 978 0 9805344 4 3

Date of publication: August 2008

Publisher: Commonwealth Ombudsman, Canberra Australia

© Commonwealth of Australia 2008

This work is copyright. Apart from any use as permitted under the *Copyright Act 1968*, no part may be reproduced by any process without prior written permission from the Australian Government, available from the Attorney-General's Department.

Requests and enquiries concerning reproduction and rights should be addressed to the Commonwealth Copyright Administration, Copyright Law Branch, Attorney-General's Department, National Circuit, Barton ACT 2601, or posted at <http://www.ag.gov.au/cca>.

Requests and enquiries can be directed to the Director Public Affairs, Commonwealth Ombudsman, GPO Box 442, Canberra ACT 2601; email ombudsman@ombudsman.gov.au or phone 1300 362 072 (local call charge). This report is available on the Commonwealth Ombudsman's website <http://www.ombudsman.gov.au>.

CONTENTS

PART 1—INTRODUCTION.....	1
Background.....	1
PART 2—THEMES ARISING IN COMPLAINTS	4
Inconsistent application of the guidelines	4
<i>Failure to apply guidelines</i>	<i>5</i>
<i>Face-to-face contact withdrawn for an incorrect period.....</i>	<i>6</i>
<i>Awareness of a customer’s review rights</i>	<i>6</i>
<i>Review of decisions made before February 2007</i>	<i>7</i>
<i>Identifying decisions made before February 2007.....</i>	<i>7</i>
Administrative issues.....	8
<i>Adequacy of notices</i>	<i>8</i>
<i>Post-incident analysis.....</i>	<i>9</i>
<i>Recordkeeping</i>	<i>10</i>
PART 3—SUMMARY AND AGENCY RESPONSES TO RECOMMENDATIONS.....	12
Centrelink response	13

PART 1—INTRODUCTION

1.1 The Ombudsman's office investigated a range of complaints in recent years from Centrelink customers who had been banned from attending Centrelink offices because of their inappropriate behaviour. These customers were subject to what is now referred to as an alternative servicing arrangement, one element of which is withdrawal of face-to-face contact.

1.2 Investigation of these complaints identified areas of difficulty in how customers exhibiting difficult or aggressive behaviour were being dealt with by Centrelink. These included:

- inconsistencies in the application of the guidelines
- administrative issues, particularly the adequacy of notices, recordkeeping practices and post incident analysis.

Background

1.3 The Commonwealth Ombudsman Annual Report 2004–05 noted that although individual decisions that had been investigated to withdraw face-to-face contact were not unreasonable, Centrelink had no national guidelines for the process. Instead, different regions had developed guidelines specific to their particular area.¹ The Commonwealth Ombudsman Annual Report 2005–06 again reported on the absence of a national approach to the issue and noted Centrelink's proposal to develop national guidelines for implementation during the first half of 2005–06. As at 30 June 2006, the lack of national guidelines for banning customers from face-to-face contact remained an issue, although significant progress with their development had been made. Centrelink had indicated it expected national guidelines would be issued to its staff later in 2006.²

1.4 The Ombudsman's office considered that the inconsistencies it had observed appeared to have been caused by the absence of national policy guidelines for dealing with these customers. After discussions with our office and consultation with peak community organisations, Centrelink recognised the need for a consistent national approach that would enhance staff awareness and understanding of the causes of difficult or aggressive behaviour.

1.5 Centrelink also acknowledged the disadvantages for those customers who were automatically banned from face-to-face contact because of an incident. It was envisaged that new guidelines would address the issues identified. On 4 February 2007 Centrelink's Executive approved national *Guidelines for Working With Customers with Difficult or Aggressive Behaviours* (the guidelines). There was some initial confusion among Centrelink staff about the status of the guidelines, with some staff believing they were an interim measure, subject to further discussion and amendment before finalisation.

1.6 On 18 February 2007, all Centrelink staff were instructed by a Chief Executive Instruction to implement the guidelines. Centrelink delivered a national training package to all Service Line Managers on the implementation of the guidelines. All managers were also instructed to review all customers whose access to Centrelink

¹ Commonwealth Ombudsman, Annual Report 2004–05, page 96.

² Commonwealth Ombudsman, Annual Report 2005–06, page 69.

had been restricted based on an earlier process. The requirement to review pre-existing arrangements was also included in the guidelines that were initially released.

1.7 This report highlights issues that have been identified in recent Ombudsman complaint investigations about the administration of the guidelines. It discusses Centrelink's current processes in terms of their consistency with the guidelines, as well as their impact on customers. The report also sets out some themes identified through the investigation of complaints: it does not provide a comprehensive analysis of Centrelink's application of the guidelines.

1.8 The guidelines aim to provide Centrelink's customers and staff with more effective support in managing incidents of aggression. In summary, the guidelines:

- apply the five principles of customer service
 - all customers have a right to receive services, be treated with respect and in accordance with natural and social justice principles
 - staff will be trained to be aware of, and understand the characteristics of, customers and the community in which their site³ operates
 - service offers made to customers must be appropriate
 - team leaders, professional and specialist staff will be actively involved in deciding the most appropriate service offer
 - the wellbeing and safety of staff will be considered
- aim to provide customers and Centrelink staff with more effective support
- concentrate on the customer's experience from their perspective
- aim to maintain customers' connections to the services and payments to which they are entitled
- replace the term 'banning' with the phrase 'alternative servicing arrangements'
- describe some causes of, and contributing factors to, aggressive or other inappropriate behaviour
- outline preventative measures
- describe appropriate interventions and responses to incidents including escalation procedures
- provide that a customer must be given a right of reply and review
- require each Centrelink site to develop and implement responses that take into account the characteristics of their local community.

1.9 Staff have ready access to the guidelines via Centrenet (Centrelink's intranet). The guidelines are set out in practical terms by the use of six scenarios, which describe escalating types of interactions that staff might encounter with customers who exhibit difficult or aggressive behaviour. Each scenario provides a range of strategies that may assist with preventing the situation from escalating. The guidelines also contain sample letters to use as a template for notices given to customers about changes to their contact arrangements with Centrelink.

³ Sites include Centrelink Customer Service Centres, agents and all other premises where Centrelink business is conducted.

1.10 Since the release of the guidelines, Centrelink has been working with the Ombudsman's office to identify and remedy instances of non-compliance. We continue to receive complaints from customers who have had face-to-face contact withdrawn at a range of different Centrelink sites. The procedure adopted in those cases did not always comply with the guidelines. The Ombudsman investigations found that the decisions made in individual cases to withdraw face-to-face contact were not unreasonable, yet some of the earlier problems relating to consistency, notification, explanations and review rights, had not been addressed.

1.11 This report uses case studies to illustrate the issues identified and makes five recommendations about improving the effectiveness of the guidelines.

PART 2—THEMES ARISING IN COMPLAINTS

2.1 The complaints investigated did not point to any major systemic flaws in Centrelink's decision-making processes and outcomes related to withdrawing face-to-face contact with customers who display inappropriate behaviour. However, the investigations prompted the following observations, and identified areas of administration of the guidelines that warrant further consideration by Centrelink. These include:

- the use of unauthorised guidelines
- face-to-face contact being withdrawn for incorrect periods
- awareness of customer review rights
- review and identification of decisions made before February 2007
- other administrative issues including
 - the adequacy of notices
 - post-incident analysis
 - recordkeeping.

Inconsistent application of the guidelines

2.2 The guidelines assist Centrelink staff to determine the most effective alternative servicing arrangement to match the situation. Scenarios are used to illustrate different levels of aggressive behaviour and outline strategies to deal with situations at that level, and when a matter should be escalated. The guidelines give options that should be considered to decide the most appropriate method for future contact, as follows:

- allocate another staff member to work with the customer
- with the customer's agreement, arrange for the customer to attend another local customer service centre (CSC) if it is assessed that a new environment would assist in future interactions
- with the customer's agreement, arrange for a community organisation to act as an advocate for the customer
- provide ongoing interaction through outsourcing in a community agency or other agency location if such a method of service delivery is provided by the site
- allocate a single point of contact, usually a social worker or team leader (with back-up staff) from within the CSC or a neighbouring CSC, with whom the customer must maintain contact; if the customer requires a face-to-face interview as part of ongoing participation requirements or for other reasons, the customer is required to contact this staff member or the nominated back-up staff only
- the period of the alternative servicing arrangements is to be determined by professional staff who will base their decision on the customer's individual circumstances; the period of time will be no longer than three months, with a review of the arrangements at the end of each period of three months.

2.3 In instances of threatening and violent behaviour, and any incidents that involve police attendance, the alternative servicing arrangements must include:

- telephone contact as the only method of contact for a specified period of time; the customer will be allocated one point of contact, usually a social worker or team leader (with a back-up contact)
- the period of time the withdrawal of face-to-face contact will be in place is to be determined by professional staff and will be no longer than three months initially
- the alternative servicing arrangement will be reviewed monthly, or earlier if considered necessary by the contact officer.

2.4 A decision to withdraw face-to-face contact is to be made by the relevant Area Manager in collaboration with the affected or relevant staff in the site where the incident occurred. These decisions are made by professional staff who have responsibility for ensuring the safety and wellbeing of their staff as well as their customers.

2.5 Recent complaint investigations conducted by Ombudsman staff indicate that the implementation of the guidelines was incomplete and patchy and consequently impacted on the overall effectiveness of the measure. A theme identified in the investigations was a tendency for Centrelink staff to be selective about which parts of the guidelines applied to the decisions they made. In most instances the staff involved had indicated they were aware of, and had received training on, the guidelines.

Failure to apply guidelines

2.6 The *Reliance on incorrect guidelines* case study is an example of where the decision maker was aware of the guidelines, but relied on a different process to deal with an instance of aggressive behaviour.

CASE STUDY: Reliance on incorrect guidelines

Mr A had a history of aggressive behaviour and making threats against Centrelink staff. In May 2007 Mr A attended the local Centrelink office for assistance and records indicate he became aggressive and was asked to leave the office.

Later that day Mr A attended a neighbouring Centrelink office. During that visit he became aggressive and intimidating towards Centrelink staff, which resulted in the police attending the incident. In the presence of the police, the office manager verbally informed Mr A that face-to-face contact with any Centrelink office had been withdrawn. A written notice confirming the arrangements was posted to Mr A shortly after the incident.

Examination of the letter sent by the manager revealed that although it provided the name and phone number of a dedicated contact officer, no back-up contact details were provided as required by the guidelines. Nor did the letter inform Mr A that he could at any time ask to have the arrangements reviewed.

The investigation of this complaint also revealed that the decision maker had disregarded the Chief Executive Instruction to use the guidelines. Although the decision maker had received training for implementing the guidelines, another agency's guidelines had been relied upon.

Face-to-face contact withdrawn for an incorrect period

2.7 Although the guidelines provide for the withdrawal of face-to-face contact for an initial period of up to three months, investigations conducted by the Ombudsman's office noted instances where the period of withdrawal of face-to-face contact was greater than three months. The *Imposition of incorrect period* case study provides an example.

CASE STUDY: Imposition of incorrect period

On 3 April 2007, Ms B attended Centrelink to lodge her newstart allowance continuation form and to query a letter dated 30 March 2007 advising that a debt had been raised. Centrelink records indicate that during this visit Ms B became verbally aggressive, the police were called and she was asked to leave.

As a result the manager issued a notice advising Ms B that she was not to enter any Centrelink office for any reason for six months.

The Ombudsman investigation concluded that Centrelink's decision to withdraw all face-to-face contact was not unreasonable because the police had been called to the incident. However, further investigation of why the contact arrangements had been imposed for six months revealed that the manager was under the impression there was discretion in the guidelines which allowed a period longer than three months to be applied. The manager had also received training on the guidelines.

The six-month period had expired before the investigation was complete, and full contact arrangements had already been restored to Ms B.

2.8 The failure to apply the guidelines in this case study resulted in multiple breaches. The restricted access period was twice as long as the period allowed for in the guidelines; a review was not conducted monthly; nor was a review conducted at the end of the three-month period. In this instance, Centrelink had waited for the restricted access period to expire rather than monitoring and reviewing it as required by the guidelines.

2.9 The breach of the guidelines meant that Centrelink lost the opportunity to assess whether anything could be done to prevent similar occurrences from arising in relation to Ms B's situation, or in other similar cases. The failure to review the decision to withdraw face-to-face contact also meant that Centrelink had no opportunity to consider whether there were other less stringent options that could have been tried earlier.

Awareness of a customer's review rights

2.10 Under the guidelines a customer can initiate a review of the alternative servicing arrangements. A customer will generally be advised orally of an alternative servicing arrangement, followed shortly by a written notice setting out the terms of the new contact arrangement. Templates for these notices are included in the guidelines. However, the template for *Scenario 6* cases (the most severe requiring police involvement) does not include information about the customer's right to initiate a review of the decision. A more appropriate explanation of the review arrangements appears in the *Scenario 5* template as follows:

One month from today (name of point of contact) will review with you the continuing need for these changes to the way you contact Centrelink. You can, however, request a review at any time. If you wish, you can have another person involved in this discussion and to speak on your behalf. To allow another other [sic] person to speak on your behalf, we will need to have permission from you either verbally or in writing.

2.11 In some of the investigations conducted by the Ombudsman's office, the customer who sought a review of their alternative servicing arrangements was incorrectly advised that there was no right of review. In other instances the customer was not advised that they could initiate a review of the arrangements.

2.12 It is likely that the shortcoming in the template for Scenario 6 (see paragraph 2.10 above) has caused confusion among Centrelink staff about the review process. In some instances Centrelink staff acknowledged they were unsure about the review process for decisions to withdraw face-to-face contact, while others indicated these decisions were not subject to any informal or formal review mechanism.

RECOMMENDATION 1

That the letter templates in the guidelines are reviewed to ensure customers are properly notified of their review rights and the review process.

RECOMMENDATION 2

That strategies are implemented to ensure relevant staff are aware of the monthly review processes required by the guidelines, and further training is provided where appropriate.

Review of decisions made before February 2007

2.13 The guidelines require all decisions to withdraw face-to-face contact that had been previously put in place to be reviewed by 30 April 2007. Complaints investigated by the Ombudsman's office confirmed that reviews had not occurred in a number of instances. Data provided by Centrelink indicated that, as at 14 December 2007, a total of 142 customers were subject to withdrawal of face-to-face contact. Of these, 120 of the arrangements had been implemented under the guidelines released in February 2007. Of the 22 customers subject to previous arrangements, 19 had had those decisions reviewed between February and December 2007. Centrelink advised that the remaining three customers subject to decisions made before the introduction of the guidelines were being reviewed.

Identifying decisions made before February 2007

2.14 A related issue was that in some instances, Centrelink was unable to accurately identify a customer who had face-to-face contact withdrawn under previous processes. Some Centrelink staff acknowledged this difficulty. This suggests that Centrelink's data on the numbers affected by a decision to withdraw face-to-face contact could be understated.

2.15 The *Review of withdrawal of face-to-face contact* case study is an example of one such investigation.

CASE STUDY: Review of withdrawal of face-to-face contact

In July 2007 Mr C complained to the Ombudsman's office that in August 2006 he had attended a local Centrelink office to lodge his application for payment form. He provided a medical certificate, but it did not fully cover the period for which he sought payment.

Centrelink records indicated that Mr C became aggressive and assaulted a Customer Service Advisor by hitting her with a computer screen. The situation deteriorated and he left, or was asked to leave the office. As a result of this incident Centrelink decided to 'ban' Mr C from entering all Centrelink offices for a period of 12 months.

Investigation of Mr C's complaint revealed that Centrelink had not reviewed its decision to withdraw face-to-face contact as required by the guidelines. This should have occurred by 30 April 2007. The explanation given by Centrelink staff for overlooking Mr C's case was because they had no reliable system in place that could identify all customers who had been subject to decisions made under old guidelines.

As a result of the Ombudsman's investigation, Centrelink agreed to review Mr C's circumstances under the current guidelines, which resulted in a return to normal servicing arrangements.

2.16 The absence of a comprehensive recording system appears to have limited Centrelink's ability to effectively implement the requirement to review all pre-existing decisions that involved the withdrawal of face-to-face contact.

2.17 Centrelink acknowledged that the Welfare to Work and other initiatives required more complex face-to-face contact with customers and the withdrawal of this type of service has the potential to disadvantage affected customers. This group of customers, who are often marginalised in many aspects of their general dealings with the community, are also vulnerable, or at risk of participation failures which could lead to the loss of their social security payments.

2.18 Given the impact that withdrawing face-to-face contact can have on customers, it is important that Centrelink staff adhere to the relevant guidelines. To ensure this, the withdrawal of face-to-face contact decisions need to be properly recorded and readily available for analysis to ensure a consistent approach is being applied across Centrelink nationally.

RECOMMENDATION 3

Centrelink should implement an appropriate internal monitoring/review mechanism to ensure quality and consistency in the application of alternative service arrangements.

Administrative issues

Adequacy of notices

2.19 One important strategy for dealing with difficult behaviour is to allocate one point of contact with whom the customer must maintain contact. The guidelines correctly indicate that a back-up contact is also necessary in case the main point of contact is absent. For this strategy to be fully effective it is important for the customer to be able to access the contact person within a reasonable timeframe. The guidelines specifically note that it is inappropriate to nominate the call centre as the customer's point of contact because that would transfer the unresolved issues to another channel of service delivery.

2.20 The Ombudsman's office noted that the letter presented in the case study below failed to provide the names of the point of contact and back-up, and a direct phone contact number.

CASE STUDY: Providing required information

Mr D complained about the decision to withdraw face-to-face contact from all Centrelink sites for a period of three months.

Centrelink records indicated that on 13 April 2007 Mr D had attended a local CSC, at which time he was verbally abusive and threatened staff with violence. The police were called and Mr D was asked to leave. A decision was made to withdraw all face-to-face contact for three months. The following extract from a letter dated 16 April 2007 was sent to Mr D confirming the arrangements:

In view of your unacceptable behaviour, you are hereby notified that you are not permitted to enter any Centrelink offices for a period of three months.

If you attend any Centrelink office during the period of the ban, the Manager will consider calling the Police to have you removed and charged under the *Public Order (Protection of Persons and Property) Act 1971*.

Your future dealings with Centrelink may be by telephone, in writing or through another person authorised by you in writing ... The appropriate contact number for telephone enquiries is **13 2850 and you may ask to be transferred to [deleted] office (extension [deleted])**. (Centrelink's emphasis)

For written contact I have enclosed a number of reply paid envelopes to be used by you in your correspondence with Centrelink'.

2.21 In this instance, the notice failed to meet the guidelines because of the use of the word 'ban', and also because the names and direct telephone numbers of the designated contact officer and back-up officer were not provided.

Post-incident analysis

2.22 The *Breakdown in relationship* case study illustrates how post-incident analysis of the history of contacts between Centrelink and a customer can achieve a better outcome both for Centrelink staff and for the customer.

CASE STUDY: Breakdown in relationship

Mr D (referred to in the *Providing required information* case study) also complained about the anxiety he experienced about his relationship with Centrelink, particularly in relation to the Manager and staff of his local CSC.

Analysis of Centrelink's records of contacts with Mr D indicated a history of verbal abuse of Centrelink staff. Based on discussions with Mr D, the Ombudsman's office noted that most of his frustration appeared to be because he did not understand the advice and explanations about his circumstances provided by Centrelink staff.

After the expiry of the period that face-to-face contact had been withdrawn, the Ombudsman's office asked Centrelink if it had considered the full range of alternative servicing arrangements outlined in the guidelines to assist staff and Mr D to minimise the risk of future incidents. The possibility of an ongoing single point of contact was discussed as a way that Centrelink could identify the communication barriers and repair the breakdown in the relationship.

After some delay Centrelink agreed that it would be appropriate to nominate the office manager as Mr D's point of contact, despite Centrelink being aware that Mr D had complained to the Ombudsman's

office about his relationship with the manager. However, Centrelink insisted that Mr D conduct his business at the local CSC.

The Ombudsman's office did not consider the arrangement to be satisfactory in the circumstances, and after further negotiations Centrelink agreed that a different alternative servicing arrangement was appropriate. With Mr D's agreement, the office manager at a neighbouring CSC (which was about 10 minutes away) was made Mr D's point of contact. This action was consistent with the national guidelines, which provided for:

- allocating another staff member to work with the customer if there are issues of personality differences or differences in age, culture and/or gender
- with the customer's agreement, arranging for the customer to attend another local CSC where it is assessed that a new environment would assist in smoother future interactions.

In reaching this view, Centrelink considered the distance the customer would then need to travel to the new site, and the 'gaining' CSC was consulted. As a result of these negotiations Mr D indicated he was happy to try the new arrangements.

2.23 In this instance, it did not appear that Centrelink had given consideration to whether its actions had contributed to the customer's inappropriate behaviour. Based on observations made during its investigation, the Ombudsman's office identified the following factors that influenced Mr D's behaviour:

- barriers to effective communication, particularly cultural and linguistic differences
- possible incompatible personality differences between the customer and main contact officer
- length of time spent in queues exacerbated Mr D's frustration.

2.24 In such circumstances, a post-incident analysis and review of all of the circumstances, including the history of the relationship, may have resulted in satisfactory contact arrangements being identified earlier. However, it appeared that in Mr D's case the withdrawal of face-to-face contact was imposed without due consideration to other alternative servicing arrangement options suggested in the guidelines.

RECOMMENDATION 4

That decision makers are encouraged to explore the most appropriate alternative servicing arrangement for future contact before deciding to withdraw face-to-face contact.

Recordkeeping

2.25 The guidelines state that following an incident the details must be recorded in an EP63 (incident report), and the customer's record must also be updated to reflect any changes to the method of service delivery. Accurate and thorough records of decisions are essential for effective internal and external review and monitoring of decisions that restrict a customer's access to Centrelink. Complete records provide protection for the customer as well as the decision maker that the decision has been made in accordance with current practices and procedures. This also ensures that independent investigations of such incidents are accurate and unbiased. Based on investigations conducted by the Ombudsman's office, it has been observed that

although the records provided by Centrelink reflect elements of the decision-making process, they often do not demonstrate that other alternative servicing arrangements were considered before deciding to withdraw face-to-face contact.

2.26 In light of the comments above, the Ombudsman makes the following recommendation about Centrelink providing more guidance to staff on the importance of making complete records of incidents and the process used to arrive at the decision made.

RECOMMENDATION 5

That the guidelines are amended to ensure staff record an appropriate level of detail to justify all actions taken following an instance of customer aggression and that the decision-making process is transparent.

PART 3—SUMMARY AND AGENCY RESPONSES TO RECOMMENDATIONS

3.1 As reported in the last two annual reports, the Ombudsman's office received a number of complaints from people who had been banned from attending Centrelink offices as a result of unacceptable behaviour. Investigation of the complaints found that in most instances the decisions to withdraw face-to-face contact were not unreasonable, but highlighted the need for national procedural guidelines to be developed to assist staff when managing customers who exhibit abusive or threatening behaviour.

3.2 Following discussions with our office and consultation with peak community organisations and Centrelink staff, Centrelink implemented new national *Guidelines for Working With Customers With Difficult or Aggressive Behaviours* in February 2007.

3.3 Since the implementation of the guidelines, the Ombudsman's office has identified a number of issues relating to Centrelink's implementation, administration and monitoring of the guidelines through more recent complaint investigations. The main issues can be summarised as follows:

- a lack of awareness by some Centrelink staff of the guidelines
- partial adherence to the guidelines
- failure to consider other servicing arrangement strategies before deciding to withdraw face-to-face contact
- failure to review decisions implemented under earlier local practices
- face-to-face contact being withdrawn for incorrect periods
- failure to conduct reviews of alternative servicing arrangements at the end of each month
- failure to conduct post-incident reviews to assist with developing plans or strategies for future contact with the customer
- inconsistent and incomplete recording of decisions to withdraw face-to-face contact to enable identification of customers affected.

3.4 After consideration of these issues, the Ombudsman makes the following recommendations to improve Centrelink's ability to provide continuing services to difficult or aggressive customers. The Ombudsman considers that, if implemented, the recommendations will improve Centrelink's capacity to make consistent and transparent decisions on the most appropriate alternative servicing arrangements to apply to customers exhibiting those behaviours.

3.5 Copies of the draft report were sent to the Department of Human Services and Centrelink for comment. Both agencies responded positively and agreed with the recommendations. Centrelink provided the following details of action it plans to take or already has in progress in relation to each of the recommendations.

Centrelink response

RECOMMENDATION 1

That the letters templates in the guidelines are reviewed to ensure customers are properly notified of their review rights and the review process.

Centrelink will create a standard letter from the letter templates contained in the Guidelines and include it in a procedural task card. The letter outlines appropriate review rights and process information. The standard letter will be completed by the 15 August 2008.

RECOMMENDATION 2

That strategies are implemented to ensure that relevant staff are aware of the monthly review processes required by the guidelines, and further training is provided where that is appropriate.

To ensure relevant employees are aware of the monthly review processes, the procedural task cards will include information about this process. The procedure will also require the employee to set up a monthly review activity on the customer's record to ensure the review is conducted.

The following strategies will ensure Centrelink employees are aware of and correctly apply alternate servicing arrangements:

- The procedural task cards will form part of an instructional package for decision makers and will be published on the Centrelink Intranet. The task cards will be available by the 15 August 2008.
- An information session will be provided to Centrelink Area Managers (delegates) at a Network Operations Meeting in August 2008, to introduce the task cards and reaffirm the review processes. Centrelink Area Managers will be required to provide this information session to their leadership team and all relevant employees within four weeks.
- Centrelink will relaunch the link to the revised guidelines via its Intranet network.

RECOMMENDATION 3

Centrelink should implement an appropriate internal monitoring/review mechanism to ensure quality and consistency in the application of alternative service arrangements.

Centrelink introduced an enhancement to its mainframe computer system in its June 2008 system release, requiring the alternative servicing arrangements of affected customers to be recorded and reviewed. The new procedural task cards will provide information to employees on the correct coding and follow up procedures stemming from these changes.

Centrelink will investigate and implement an appropriate internal monitoring mechanism to ensure quality and consistency in the application of alternative service arrangements.

RECOMMENDATION 4

That decision makers are encouraged to explore the most appropriate alternative servicing arrangement for future contact before deciding to withdraw face-to-face contact.

Recommendation 4 will also be addressed at the information session to be held for Centrelink Area Managers at a future Network Operations Meeting in August 2008. The procedural task cards will include instructions for employees to explore all servicing options before making a decision to withdraw face to face contact.

RECOMMENDATION 5

That the guidelines are amended to ensure staff record an appropriate level of detail to justify all actions taken following an instance of customer aggression and that the decision making process is transparent.

The procedural task cards will include a requirement for employees to appropriately record the alternate arrangement decisions including the details of the behaviour that led to the decision. Centrelink will amend the guidelines to include information on the minimum reporting requirements. In addition, one of the task cards will include instructions on the reporting requirements.