



NORTHAMPTON
PARTNERSHIP HOMES

SINGLE POINT OF CONTACT (SPOC) POLICY

October 2022

Version 2

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DOCUMENT MANAGEMENT

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Version 2

Contact Officer: Susan Morris, Data Intelligence Officer

Contact: (Responsible Person) Kathy Brooks, Corporate Strategy & Data Manager

THIS DOCUMENT IS TO BE READ IN CONJUNCTION WITH:

1. NPH Unacceptable Behaviour Policy
2. West Northamptonshire Council's Unacceptable or Unreasonable Communications and Behaviour Policy

Revision date	Previous revision date	Summary of Changes	Version
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1. Purpose and Context

A Single Point of Contact (SPOC) is an individual or department that handles contact and communication with customers who display behaviour or communication deemed unreasonable and/or unacceptable.

The initiation of a SPOC is the formal stage of NPH's Unacceptable Behaviour Policy in response to either unreasonable, demands or persistent behaviour and/or communication where the issuing of informal or written warnings have not led to a change in behaviours.

Under the SPOC Policy a SPOC Register is in place to ensure that information about persistent / unreasonable customers, or customers who persistently contact various members of NPH, and who are required to be dealt with by one contact method or person at NPH, is recorded and formally managed in a central database.

The designated SPOC ensures that all contact and requests are then passed to the relevant department or NPH employee, who may then have contact with the customer as part of their work duties, in a one point of contact coordinating role.

We can choose to restrict contact in a variety of different ways including and not limited to:

- By subject matter
- To a named staff member
- Contact channel
- Or a combination of these

The information held and processed on the Register will be in accordance with the UK General Data Protection Regulation and will be governed by security measures which prohibit unauthorised access, disclosure, alteration, loss and destruction of information. Furthermore, our service commitments encompass our legal obligations under the Equalities Act 2010 and recognises that a customer who has rights under the Equalities Act 2010 may still be considered to be acting in an unacceptable manner resulting in our decision to restrict access.

2. Policy Statement

NPH is committed to dealing with all complaints, issues or requests made by customers fairly and impartially. As such, we do not normally limit the contact customers have with our officers unless the informal measures taken have not resulted in a change of behaviours as requested. However, there are a small number of instances where customers are unreasonably demanding, persistent or demonstrate unacceptable behaviour or communication and this may impact on our ability to provide a good level of service to others. To manage contact with a customer who behaves in this way, we may choose to provide a Single Point of Contact. This decision is not taken lightly, but NPH will not hesitate to impose restrictions where we feel this is necessary to protect our staff or our services, including contractors working in our homes on our behalf. Equally, a SPOC also provides customers with reassurance that their issues have been captured and will be responded to via one contact point, who will also offer any further support as required.

NPH's Fair Treatment Statement for employees and our contractors who work in our homes on our behalf:

- Northampton Partnership Homes believes everyone should be treated fairly.
- We will not tolerate racist, sexist or other offensive comments, abuse or threatening behaviour.
- If employees and contractors are the victim of such comments or behaviour while at work, they have the right to challenge it and ask the person(s) to stop.
- If the behaviour persists employees and contractors may withdraw the service being provided. If it takes place in NPH places of work, they have the right to ask the person(s) responsible to leave.

3. What behaviour might lead us to introduce a SPOC?

The type of behaviour that could lead us to introduce a SPOC is set out in our Unacceptable Behaviour Policy. The types of behaviour may include, but are not limited to:

Unreasonable behaviour

- Changing the basis of a complaint/request as the matter proceeds
- Refusing to accept a decision; repeatedly arguing points with no new evidence
- Persistently seeking an outcome which NPH has already explained is unrealistic for policy, legal or other valid reasons
- Racist, sexist, or other offensive comments
- Abusive or threatening behavior
- Verbal abuse and/or inappropriate use of language and;
- Personalised comments towards employees

Unreasonable excessive demands

- Requesting large volumes of information
- Demanding responses within an unreasonable timescale
- Refusing to speak to an individual or insisting on speaking with another member of staff when that is not possible
- repeatedly changing the substance of a request, enquiry or complaint or raising unrelated concerns
- unreasonable levels of contact, including overload of letters, calls, emails or contact via social media – whether due to the frequency of contact or the frequency and / or length of telephone calls. This can include when a customer repeatedly makes long telephone calls to us or inundates us with copies of information that has been sent already or that is irrelevant to the enquiry, request, or complaint and;
- making repeated and unnecessary contact during the course of us dealing with an enquiry, request or complaint or carrying out an investigation

Unreasonable persistence

- Refusing to accept the answer that has been provided about a request, complaint or other issue
- continuing to raise the same subject matter without providing any evidence to substantiate a claim or the provision of new evidence
- Continuously adding to or changing the subject matter of a request, complaint or other issue

4. What is the process for introducing a SPOC?

In line with the Unacceptable Behaviour Policy there are three stages to managing unacceptable behaviour – informal stage, warning stage and formal stage. A SPOC is initiated when the behaviour has reached the formal stage and where it is deemed that the right course of action is to provide a single point of contact.

For reference the actions taken under the informal, warning and formal stages under the Unacceptable Behaviour Policy are detailed below:

- **Informal Stage**

A team leader or other appropriate manager will contact the customer to try to agree an informal solution to the issue. This will involve setting out clearly the behaviour that we deem to be unacceptable, how we expect the customer to change their behaviour in the future and the actions we may take if their behaviour does not change.

We will try to find out whether the root cause of issue was to do with an NPH service for example, have we failed to respond to their requests for help or have we failed to address every aspect of a complaint? If this is the case, we should address these outstanding matters as a matter of urgency.

We will also try to find out whether the customer has other issues that are contributing to their behaviour such as poor mental health, learning difficulties or drug or alcohol dependency. We will offer to refer them to an appropriate agency if they agree.

In agreement with the customer, they can ask us to contact them via a third party, such as a family member or friend. If that person behaves in a way that we deem to be unacceptable according to this policy, we will stop that arrangement and deal directly with the customer. If the option of a third party is not available, we could offer formal mediation if we believe it will help to resolve matters and the relationship will be unlikely to be improved without it.

The desired outcome of this informal stage is to resolve whatever the core issue is, and to prevent any further incidents of unacceptable behaviour.

- **Warning Stage**

If the unreasonable behaviour, demands or persistence continues, we will send out a Fair Treatment Letter to the customer.

This will set out clearly what is expected of the customer in terms of acceptable behaviour and that we may consider introducing a Single Point of Contact if their behaviour doesn't change. We will also set out the timescale for review. Officers should begin to collect evidence of the unacceptable behaviour to include details, frequency and type of contact should we be required to move to the next stage of the policy.

If the level of contact reduces to an acceptable level, there will be no further action.

If the unreasonable behaviour, demands or persistence continues, the Team Leader or Manager should put forward their request to move to the next stage by contacting NPH's Data Management Officer who will arrange a meeting with all relevant staff members to discuss the case and explore options in order to re-establish working relationships.

- **Formal stage**

The action we choose to take will depend on the nature of the behaviour. The types of action that we may take include the following:

- Providing a single point of contact and
 - Limiting contact to a single form for example writing, email or telephone only and / or
 - Limiting contact to certain times or to a limited number of times per week or month and / or
 - Only considering a certain number of issues in a specific period
- Declining to give any further consideration to an issue unless any additional evidence or information is provided.
- Deciding not to investigate an issue or complaint on the basis that it has been pursued in a way that is unacceptable
- Any other actions we deem to be appropriate and proportionate to ensure that we can carry out our duties while keeping our staff and any contractors safe.

4.1 How to initiate a SPOC at the Formal Stage

At the Formal Stage, where a single point of contact (SPOC) is considered, Managers and Team

Leaders will raise the request to review a SPOC arrangement with the Data Management Officer (DMO) using the SPOC Referral Form in Appendix C.

A SPOC Review meeting will be held with all relevant parties and the request and evidence discussed. The review will consider if a SPOC will be initiated based on the evidence provide. Where a SPOC is agreed, appropriate measures and timescales for the point of contact and any further support and / or advice that can be given to the customer. Where a SPOC is not agreed at that point in time, a future date to review the case will be agreed.

Where a SPOC is agreed the customer will be informed in writing that a Single Point of Contact is being introduced. See sample letter at Annex A.

All letters will include:

- The reasons why a SPOC is being put into place
- The change required
- The name of the NPH Single Point of Contact
- The details for the method of contact
- The restrictions put into place
- How long the SPOC arrangements will be in place for and a review date
- How customers can appeal

The DMO will update records on NPH's SPOC Register to show that a SPOC has been put in place and request that a SPOC flag is added to JADU CRM and Open Housing system. The flags will ensure that future customer contact is signposted to the SPOC so that contact and requests can be coordinated as per the arrangements detailed.

The SPOC Register record will include:

- The name of the NPH Single Point of Contact, including an alternative member of staff who can provide cover for sickness or annual leave
- The details for the method of contact
- The NPH email address the customer is restricted to using to contact us
- Any restrictions to visiting Council Offices such as the One Stop Shop

The review date will be retained and monitored centrally to ensure that all SPOC arrangements are formally reviewed and within agreed timescales. Once the arrangements have ceased, the central log will be updated.

As with all types of unacceptable behaviour we will:

- Keep accurate factual records of incidents including from trusted third parties. Hearsay or opinion will not be considered as part of the decision-making process
- Keep customers informed of our decisions and the basis for those throughout
- Offer customers the chance to appeal any decisions we make by contacting the responsible officer within 28 days of the decision. We will inform the customer of how to make an appeal

in our communications with them.

- Appeals for SPOC will be considered by either the Assistant Directors for Corporate Service and ICT, Assistant Director for HR and Organisational Development and the Assistant Director for Finance
 - Appeals will be considered within 5 working days of the request being received.
- Review the SPOC after an agreed period (of between 3 and 12 months depending on the nature of the behaviour).
 - Only share information with people who need it. For example, if we temporarily alter the way we work with a customer, relevant staff and contractors will need to know about any new arrangements, but they do not need to know the reasons for them.

5. Failure to respond to requests to changes in behaviour

- 5.1 Where a customer continues to behave in a way which is unacceptable or overrides the restrictions imposed under this policy, the Complaints Manager in consultation with NPH's legal services, may decide to refuse all contact with the customer and stop any investigation into their enquiry, request or complaint.
- 5.2 If this is the case, the customer will receive a “**cease and desist**” letter. At this point, NPH may choose to refer the customer to the relevant Ombudsman as the possibility of resolving an issue or complaint will no longer be available.
- 5.3 NPH will notify the customer in writing confirming that it has responded to the points raised and has tried to resolve the issues, however there is nothing more to add and continuing contact on the matter will serve no useful purpose. This notification will state that correspondence is at an end and that further communications will be acknowledged but not answered.

6. SPOC Register and monitoring

Approved SPOC arrangements are logged in a centralised SPOC Register managed by the Data Management Officer. The SPOC terms and review dates are recorded and monitored.

The Data Management Officer will ensure that review dates are adhered to, that central records are maintained and up to date and that the process set out in this Policy is followed.

When SPOC arrangements cease, the DMO will ensure that all system flags are removed.

Officers who are nominated as SPOC's will ensure that alternative arrangements are in place during anytime where they are absent from the office due to annual leave and the customer made aware of the temporary change in contact(s).

7. NPH and WNC SPOC arrangements

NPH is the agent body for the management of housing stock owned by West Northamptonshire Council (WNC). As such, there will be times when our customers are also WNC customers as their Contact Centre is the first point of contact for NPH calls. Therefore, there are times when WNC need

to be made aware of SPOC arrangements for NPH Tenants so that they can direct calls accordingly as per the SPOC arrangements. Information regarding SPOCs is shared under the Data Sharing Agreement between both parties.

Under WNC's Unacceptable or Unreasonable Communications and Behaviour Policy they will also initiate SPOC arrangements. As partners NPH and WNC will share where a SPOC has been instigated by either party where it relates to a housing matter where the service is provided by NPH as the agent for WNC. Both parties will therefore keep each other informed of all SPOC arrangements, changes made and outcomes of reviews.

System flags applied to show when a SPOC is in place will also be visible by both parties in shared systems (JADU and Open Housing).

8. Data Protection

Personal data rights extend to all individuals, including those whose behaviour is captured by this policy. An individual has the right to request copies of all personal data held by the NPH.

They also have the rights to request personal data are amended, updated or removed/deleted where it can be shown to be inaccurate or irrelevant.

Therefore, officers must ensure all recorded data;

- is relevant – only include references to other issues if they are directly relevant;
- is factual – does not include hearsay;
- Can be substantiated – evidence based, first-hand; and/or
- Does not include personal comments.

Requests for access to information (SARs) and amendments must be made to the Data Management Officer (email: HousingInformationRequests.NPH@nph.org.uk).

Information and records kept relevant to SPOCS will be retained for six months and then deleted as per NPH's Retention Schedule.

9. Policy Review Date

- 9.1 This policy will be formally reviewed within 3 years of approval with an annual desk top review.

Appendix A - SPOC Introduction Sample Letter

Following your telephone conversation with XX, I am writing to confirm the Single Point of Contact (SPOC) arrangements discussed.

Your Single Point of Contact is XX and they can be contacted by email xxxxx and/or telephone xxxxx. If you have a housing management or repairs query you should contact XX on 1234567.

Calls to this number should only be made during working hours, and if XX is unavailable, then a message should be left, and this will be responded to as soon as she is able.

In an emergency you are permitted to make contact with the Contact Centre directly on 0300 330 7003.

We will not tolerate offensive comments, abusive or threatening behaviour. Therefore, all contact must be in a non-abusive and non-adversarial tone.

I would like to take this opportunity to remind you that such behaviour is unacceptable and does not conform to Northampton Partnership Homes Policy of respecting colleagues, tenants, leaseholders and customers. Northampton Partnership Homes believes everyone should be treated fairly and have a duty of care towards staff as well as our tenants and leaseholders.

The SPOC arrangement will remain in place for XX months whereby a review will take place on....

You have the right to appeal this decision. Should you wish to do so, please contact your Specific Point of Contact.

Appendix B - SPOC Review Sample Letter

I write following the allocation of a Specific Point of Contact (SPOC) to you on 31 March 2021.

I would formally advise that following a review of that decision, your restriction to contact NPH by either letter or email remains in place.

The review highlighted:

- Your continued failure to comply with the SPOC request to send all communications with NPH through your designated Single Point of Contact during the period 31 March 2020 – 31 March 2021
- NPH has continued to receive and been copied into communications with partners that contain offensive and abusive comments directed at individuals.

We will not tolerate offensive comments, abusive or threatening behaviour. Therefore, all contact must be written in a non-abusive and non-adversarial tone.

I would like to take this opportunity to remind you that such behaviour is unacceptable and does not conform to Northampton Partnership Homes Policy of respecting colleagues, tenants, leaseholders and customers. Northampton Partnership Homes believes everyone should be treated fairly and have a duty of care towards staff as well as our tenants and leaseholders.

The SPOC arrangement will remain in place for a further 12 months whereby a further review will take place on 31 March 2022.

You have the right to appeal this decision. Should you wish to do so, please contact your Specific Point of Contact.

Appendix C - SPOC Referral Form

Application for a Single Point of Contact

Customer details

Name, address, tenancy reference.

Reasons for application – unreasonable behaviour / demands / persistence

Include brief history of types of behaviour / frequency / dates, evidence that the customer has been through the informal and warning stages.

Proposed SPOC

Include the name of the primary SPOC, who will provide cover in the SPOC's absence and any restrictions on methods or frequency of contact.

Manager with whom SPOC application discussed:.....

Meeting review date:.....

Decision

a) SPOC agreed from (date):.....

DATE to be reviewed:.....

SPOC person(s) agreed as:.....

b) SPOC not agreed, including reasons:

Community Impact Assessment - Appendix D

1. About your review

Name of the project, strategy, policy, process or service under review:				
Unacceptable Behaviour Policy				
Is the project, strategy, policy, process or service: Policy		CURRENT	REVISED	NEW YES
Which customer groups will be impacted?	CURRENT TENANTS Any tenant that behaves in a way we deem to be unacceptable according to this policy.	CURRENT LEASEHOLDERS Any leaseholder that behaves in a way we deem to be unacceptable according to this policy.	STAFF Staff who are also tenants who behave in a way we deem to be unacceptable according to this policy.	OTHERS Any representatives of tenants / leaseholders who behave in a way we deem to be unacceptable according to this policy.
Policy to clarify they types of behaviour that we deem to be unacceptable and the actions we could take to address such behaviour.				
CIA carried out by:				
Lead officer: Susan Morris and Kathy Brooks		Residents:		
Staff:		External stakeholders:		
		Other:		
Document Management				
Approved by: EMT / SMT		Next review date: October 2024		Contact Officer: <i>Susan Morris, Data Intelligence Officer</i>
Date of approval:		Version: 1		Service area: Corporate Services and ICT

2. Relevant Equality Monitoring Data

Use this section to give as much information as possible about helpful customer data. Think about: customer profiling, complaints, compliments, satisfaction surveys and census data.

Equality Data Monitoring		
What internal equality data do you use to monitor this policy?	Internal or external data?	Engagement?
Data from Capita (Open Housing)	Internal	
Complaints data	Internal	
Information from contractors	External	

3. Analysis of Impact on Equality

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relationships with protected groups. Consider how this project, strategy, policy or service review will achieve these aims.

Protected Characteristics	Which groups would be affected	Impact (Positive/Negative/Neutral)	Risks	Mitigations / Recommendations
Race and ethnicity	No			
Disability	Possibly	Positive – our interaction could result in additional support being offered to customers with disabilities / vulnerabilities. TENANTS ONLY	Some customers may not wish to engage with support or to share personal information.	Referral / signpost to other agencies for information even if customer is unwilling to engage at the outset.
Sex	No			
Age	No			
Religion or Belief	No			
Gender Reassignment	No			
Sexual Orientation	No			
Pregnancy and Maternity	No			
Marriage and Civil Partnership	No			
Evidence Base: (Evidence used / likelihood / size of impact) How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision? E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.				

Analysis of Impact on Well-being

Well-being – Use this section to determine how the project, strategy, policy, process or service will impact on a customer’s health and wellbeing, and whether the proposal will impact on the demands for, or access to our services.				
Category Area	Which groups could be affected?	Impact (Positive / Negative / Neutral)	Risks	Mitigations / Recommendations
Mental Health and Wellbeing	Yes	Positive - The behaviour and the way we respond can highlight a support need we would otherwise have been unaware of. (TENANTS ONLY)	Some members of staff may not be equipped to recognise the underlying issues and act appropriately. Customers may not recognise their issues or wish to discuss them or receive support.	Staff training. Reiteration of the offer to support (NPH) or referrals.
Healthy Lifestyles	No			
Accidents and Falls Prevention	No			
Access to referral of other services/partners	Yes	Positive – see above under mental health and wellbeing	Customers may not recognise their issues or wish to discuss them or receive support.	Reiteration of the offer of a referral.
Independent Living	No			
Safeguarding	Yes	Positive – we may become aware of an issue we would otherwise have been unaware of	Some members of staff may not be equipped to recognise the underlying issues and act appropriately.	Staff training.
Other	No	Positive – having one person to support and understand the customer’s full range of issues.	The SPOC may not have the skills or knowledge to manage the full range of issues a customer might have.	Staff training, support and good communication between teams.
Evidence Base: Evidence used / likelihood / size of impact) How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision? E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.				

4. Analysis of Impact on Community

Use the following template to highlight the impacts of your proposal on each of the following categories: The Economy, the Environment, and Localities/Communities.

Community Impact Assessment – A Community Impact Assessment (CIA) helps us make sure our policies, strategies and projects do not discriminate against anyone in respect of disability, gender and racial equality.			
Impact and groups that could be affected	Impact (Positive, neutral, negative)	Risks	Mitigations / Recommendations
Impact to the Economy: •	Neutral		
Impact to the Environment: •	Neutral		
Impact to localities / communities: • <i>E.g. disadvantaged groups, for example, carers, veterans, and military staff, homeless, rurality, low income etc.</i>	Positive	See above pages 6 and 7	See above pages 6 and 7
Other:			
Evidence Base: (Evidence used / likelihood / size of impact)			
How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision? E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.			

5. Taking action

A Community Impact Assessment cannot be signed off until negative outcomes are addressed. What actions you have taken or plan to take to remove and/or

Actions identified from CIA	Target completion date	Responsible Officer	Is this action identified in any other monitoring framework?	Comments

6. Assessment Review and Sign Off

Assessment Review completed by: Kathy Brooks, Corporate Strategy & Data Manager			
Comments:			
No further actions			
Next review date: January 2023			
Name:	Kathy Brooks	Date:	22.12.2021
Directorate:	Corporate Services & ICT	Signature:	K.Brooks