

Department of Social Protection

Code of Conduct for Office Interviews and engagement with customers

The purpose of this Code of Conduct for interviewing and engaging with customers in the office is;

- To set out the conduct and performance that is required of all Staff who are interviewing and engaging with customers on office premises.
- To set out standards for the use of interview facilities to ensure the safety of staff and customers.

**Regional Support Unit,
February 2017**



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INTRODUCTION

The purpose of this Code of Conduct for interviewing and engaging with customers in the office is to set out the conduct and performance that is required of all staff in carrying out their official duties. It will also set out the required standards for the use of interview facilities to ensure the safety of staff and customers.

All staff must obey the Civil Service Code of Ethics, comply with the Data Protection Obligations for DSP Staff, The Civil Service Code of Standards and Behaviour and should also be familiar with Customer Complaints Procedures.

It is also expected that customers will comply with their responsibilities as set out in the Customer Charter and the record of mutual commitment.

Staff conducting interviews are required to be aware of and apply the obligations set out under the Department's policies on Child Protection (Children First), Suicide Prevention and Vulnerable Adults, and Health & Safety. Training is available on each of these requirements and staff are under obligation to ensure that they fully understand and apply the safeguards provided.

Note: It is the responsibility of all managers to remind staff regularly about their obligations in relation to Data Protection and ensure that relevant annual declarations are signed.

It is also the obligation of staff to immediately inform their own line manager of any Data Protection issue.

1. SCOPE

- 1.1. This Code applies to all staff members interviewing and engaging with customers in an office regardless of grade, function or area of operation. It will be of particular use to staff engaged in the delivery of Intreo services, claim investigation, community welfare services, and provision of information services, activation activities, career guidance, seminars and formal/cautioned interviews as part of fraud and/or other enquiries.
- 1.2. This Code applies to any staff member, contractor, or other person working in co-operation with, or on behalf of the Department where they participate in an interview.
- 1.3. This Code covers interviews/interactions with a customer or their advocates/representatives and interpreters whether formal or informal.
- 1.4. A separate code will apply for use by staff on any type of outdoor duty.

2. PRE INTERVIEW STAGE (for scheduled interview)

Where a customer is to be interviewed, adequate notice should be given as well as options to arrange at a date other than the date indicated in the invitation. If the customer is required to bring supporting documentation, the documents required should be clearly indicated in the invitation.

2.1. Before interview

Factors that may affect how the interview is conducted should be considered carefully in advance. Staff members must be familiar with the topics they wish to discuss, carry out system checks (BOMi, ERIN etc.) and prepare any notes that are required for the interview.

If necessary, book facilities, rooms and equipment required to conduct interviews. Advance scheduling of interviews should always be entered on BOMi appointment calendar.

2.2. Interviewing Minors

Where it is necessary to interview a minor (under 18 years of age) in respect of a claim for a Social Welfare payment the Department's Children First procedures should be consulted and adhered to, in order to minimise the risk of an allegation of impropriety or inappropriate behaviour. Minors must not be interviewed at the office without the presence of a parent, guardian or adult representative. Should a parent, guardian or adult representative not be available or if the customer wishes to conduct the interview in the absence of a parent/guardian/adult, the minor must be interviewed in the presence of another staff member or manager for the purpose of fulfilling the Department's obligations.

2.3. Purpose and Identity

When interviewing a customer, any staff member present must be introduced by name and function i.e. my name is and I am a..... (state function) and this is..... (repeat for second person if appropriate) (e.g. trainee). The staff member must offer to show valid DSP Photo ID to the customer before the interview commences.

Before the interview commences staff should be satisfied as to the identity of the customer. The customer should be asked to show their PSC card or to produce an acceptable form of photo ID for example, a Driving Licence or Passport.

Apart from the initial introduction and exchange of pleasantries which staff may use to establish a rapport with a customer all questions asked should be relevant to the purpose of the interview.

Interviews should only be for official purposes and the reason for the interview should be made clear and stated at the outset.

Staff should maintain a respectful distance from a customer and staff should be mindful of cultural customs and norms. A handshake is an

acceptable form of physical contact with customers, however only if first initiated by the customer. Staff should make no physical contact **whatsoever** with a minor.

3. TACT AND COURTESY

All customers must at all times be treated equally, fairly and with respect and dignity, as outlined in the Customer Charter. Copies of the Customer Charter should be prominently displayed in each office.

Staff should:

- 3.1 Be mindful of any special circumstances and conduct the interview with consideration, sensitivity, understanding and empathy.
- 3.2 Be familiar with the official translation and interpretative services available to customers e.g. Braille.
- 3.3 Facilitate the customer if it is requested that the interview be conducted through the Irish Language.
- 3.4 Be aware of the guidelines dealing with suicide prevention.

4. INTERVIEW ROOM

- 4.1 Interview rooms with door release switches must have bilingual signage clearly legible to customers seeking to exit the room. The Department has introduced new signage to identify the release switches for all interview room doors. Managers must ensure that this signage is in place and is visible to all customers.
- 4.2 Where interview rooms, including rooms used for group information sessions, still have mechanical mechanisms (such as keys), staff should not, under any circumstances, engage these locks while customers are in the room, as it is against Departmental policy.
- 4.3 Where possible, there should be separate doors at either end of the interview room, with the officer sitting between the staff exit door and the customer. Exit doors leading to staff only areas should only be

accessible from within the interview room by way of swipe cards.

- 4.4 All interview rooms should be equipped with functioning panic alarm buttons.
- 4.5 Where interview rooms have glass walls separating the room from the public area, window blinds should be left open/up for safety reasons and PC screens should not be viewable from the public area.

5. INTERVIEWING THE CUSTOMER

Staff should be familiar with the Customer Code of Conduct and the Customer Charter which outline the obligations of both staff and customers.

Interviews with customers should be conducted in designated interview rooms/desks; the practice of staff interviewing customers in public areas is not acceptable. This is both for the protection of staff and to ensure the privacy of customers. Customers should not be brought into staff areas.

It is recognised that there are different dynamics involved for interviews depending on their purpose. In some situations where a need/risk has been identified; it may be prudent to have another staff member present to act as a witness. In such instances staff should consult with their local line manager, where possible, before putting such arrangements in place.

- 5.1 At the outset of the interview, staff should use the content of the new “customer interview card” as an aide memoire to advise the customer of the reason for/ expected duration of the interview along with health and safety considerations pertaining to the interview room. See Appendix 1.
- 5.2 Staff should advise customers that the interview is voluntary in nature and that they are free to leave or terminate the interview at any stage (however in electing to terminate the interview, the customer should be advised that their payment may be affected).

- 5.3 Staff should not investigate or conduct an interview relating to any claim from a relative or personal friend and if they receive any such claim alternative arrangements should be made for processing the claim.
- 5.4 Staff should ask to interview a customer alone, provided the customer is over the age of 18 years. However, if a customer asks to be accompanied by a relative, friend or advocate, this request should be considered. If a customer is under the age of 18 please see the Children First Reporting Guidelines for staff.
- 5.5 If a staff member witnesses or becomes aware of a child whom they believe may be the subject of child abuse then the Officer should report their concern to the Children First Designated Liaison Person in their Division. The list of Designated Liaison Persons for each Division is available through the Children First Reporting Guidelines.
- 5.6 Staff should exercise judgement in relation to persons who can accompany the customer to an interview. This is particularly relevant in relation to vulnerable adults.
- 5.7 Staff should ensure that the only people present at an interview are those who are entitled to be there, and they may limit the number of people by whom the customer is accompanied in the interview room.
- 5.8 Staff may consider having a colleague present at the interview if a customer requests that another person accompany them.
- 5.9 A third party e.g. relative or friend should not be asked to translate for a customer. While the customer may propose this, it is preferable that official translation services are used.
- 5.10 Minors must never be allowed to interpret.
- 5.11 Staff should commence the interview by putting their mobile phone on silent mode.
- 5.12 Staff should request that the customer switch off, or put their phone on silent mode.

- 5.13 As outlined on the “customer interview card,” it may be mentioned that it is Departmental policy not to allow a customer to record the interview with a mobile phone or other electronic equipment.
- 5.14 Officers should terminate interview immediately if it is suspected that the interview is being recorded. The customer should be advised that if the interview is terminated this may have an adverse effect on the outcome of their claim. If the interview is terminated the customer should, in the interests of natural justice be given another opportunity to co-operate. A full report should be provided to the Deciding Officer.
- 5.15 Staff must refrain from using inappropriate language or jargon/acronyms etc. and should act in a professional and accountable manner towards customers and colleagues alike.
- 5.16 If a customer uses abusive or aggressive language, staff should warn that such behaviour is not acceptable and that if continued will lead to the interview being terminated which could affect their claim. The reason for terminating the interview should be included in the report to the Deciding Officer.
- 5.17 Staff should report all instances where a customer has been abusive/threatening. Such incidents must be reported to the relevant line manager, Health & Safety Unit in FMU and if necessary, the Gardaí.
- 5.18 Staff should seek the assistance of security staff if there are any concerns for their personal safety. Arrangements should be put in place to have another staff member present during any subsequent interviews where required. Staff may also wish to consult with SIU on such matters.
- 5.19 When interview rooms are in use, doors should be closed and a bilingual sign/notice should be placed on the outside of the door stating ‘Cruinniú Ar Siúl’ and ‘Meeting in Progress’.
- 5.20 If the interview room has an internal release button, staff should point this out to the customer in the introductory comments. Staff should add that the interview is voluntary in nature and that the customer is free to leave anytime if they wish to do so.

5.21 The Department considers the manual locking of interview room doors to be a serious breach of this Code of Conduct. It is intended that any breaches will be investigated under the Civil Service Disciplinary Code.

5.22 If considered necessary, staff may terminate an interview at any stage and arrange for it to be re-scheduled.

5.23 It is at the discretion of staff to insist that customers and any other person present are suitably dressed during an interview. In some circumstances it may be necessary to re-schedule the interview, to allow the customer to remedy the issue.

5.24 Staff should exercise judgement and may re-schedule an interview, where appropriate (e.g. a customer having suffered a recent bereavement or other unforeseen changes in personal circumstances). The customer appointment on BOMi should be updated accordingly.

6. DATA PROTECTION AND PRIVACY

Staff should take particular care, when in interview rooms to safeguard official papers, files and electronic devices, including telephones and mobile devices.

Staff should:

- 6.1 Be aware of and be compliant with Data Protection Legislation, and maintain clear and accurate records.
- 6.2 Be aware that customer information held on DSP files and systems (e.g. BOMi) is subject to the provisions of the Freedom of Information Act.
- 6.3 Ensure that files and documentation relating to customers are held safely, particularly if the staff member has to leave the interview room for any purpose.
- 6.4 Never situate mobile devices or PCs with screens visible to a customer.
- 6.5 Never leave PCs, laptops or tablet devices unlocked when exiting interview rooms.
- 6.6 In the event that files are lost or stolen, immediately notify their Manager, Business Information Security Unit (BISU) and the Regional Support Unit (RSU). In the event of a mobile device (Department phone, laptop, tablet device) being lost or stolen, the relevant line manager, BISU, IS Services and the RSU should be notified immediately.
- 6.7 Never reveal information about a customer without their consent.

There are some exceptions, which include;

- Where concealment of information would result in danger to the customer or others;
- Where required by law or for purposes of professional consultation or supervision e.g. court proceedings or a legal order in line with BISU guidelines;
- If a staff member encounters a situation where an individual is in a very distressed state and expresses suicidal thoughts, s/he should

follow the guidance outlined by the National Office for Suicide Prevention;

- If a staff member has a concern about the welfare of a child, s/he should follow the guidance outlined in the Children First National Guidance for the Protection and Welfare of Children (issued by the Dept. of Children and Youth Affairs) - intended to assist people in identifying and reporting child abuse and neglect and deal effectively with concerns.

7. COMMUNICATION

Staff should:

- 7.1 Advise customers of their obligation to fully disclose their circumstances and of the consequences of non-disclosure. Staff should also reiterate that customers are obliged to notify of any subsequent changes which may affect their claim.
- 7.2 Clearly advise customers of the purpose of documents they are asked to sign, such as declarations on claim forms, authorisations for banks etc.
- 7.3 Never ask customers to sign blank authorisations, forms or documents.
- 7.4 Not make any comments that customers might interpret as a verbal refusal of a claim. For example, comments like “you wouldn’t pass the means test” should be avoided.
- 7.5 Never accept gifts or inducements, and in the interests of transparency, advise their line manager where any may have been offered. Always provide customer with a written copy of any documents/information required and keep a scanned copy also. Use editable BOMi document as designed for this purpose.

7.6 Written communication with customers and enquiries to third parties must;

- Be on headed paper or on official forms;
- Show the subject of the communication and give a reference identifier, if relevant;
- Show clearly the contact details of the issuing officer i.e. name, function/role;
- Include a signature (where issued locally) and where appropriate, a work email address;
- Show the date of issue and a PPSN, (no PPSN for third party communications);
- Use plain language and no official jargon or acronyms;
- Use the Irish Language if a customer has indicated a preference for correspondence in Irish.

7.7 Staff should never communicate with the media in relation to their work. If contacted, they should refer the enquirer to the Press Office.

8. DIVERSITY AWARENESS

8.1. Staff Should:-

8.1.1. At all times be conscious of the Department's diverse customer base and front-line staff should avail of customer service training which includes diversity awareness.

8.1.2. Be aware of the customer's rights to equal treatment, established under equality legislation on the grounds of gender, marital status, family status, sexual orientation, religious belief, age, disability, race and membership of the Traveller community.

8.1.3. Identify and work to eliminate barriers to accessing services by people experiencing poverty and social exclusion, including geographic barriers.

8.2. **Service delivery**

Certain weekdays have a particular religious significance for some customer groups.

While staff should make every effort to facilitate individual requirements, it is not always possible to tailor Intreo services for a particular cultural, religious or other customer group.

8.3. **Dress**

In some instances customers may be required to remove certain items of headwear (e.g. hats, scarves, hijabs etc.), for identity verification purposes. It is not always possible to make exceptions for any particular customer group.

8.4. **Modesty/cultural considerations**

Some customers with particular beliefs may request that services be delivered with certain requirements. For example;

- Being interviewed by a staff member of the same sex;
- Not being interviewed alone;
- Not having their photograph taken;
- Not having to take off headwear;
- Not being interviewed without their spouse/cohabitant/civil partner being present.

While at all times staff should be sympathetic and respectful, it should be tactfully indicated that it is not always feasible to accommodate such requests.

8.5. **Prayer**

Some religions require their followers to pray at specific times during the day. The Department is unable to facilitate provision of such requests, including;

- A quiet place (or prayer room) or a designated space to undertake their religious observance;
- Washing facilities for ritual requirements.

8.6. **Religious Observance, including Fasting**

Some customer groups have extended periods of religious observance and fasting and they may feel that they are unable to engage/participate with services/interview during these times.

Again, it may not always be possible as part of service delivery to tailor services for individual religious customs.

8.7. **Interaction with other customers**

Some customers may not wish to be present in the same waiting room, public office area, meeting/group information session etc., with members of other customer groups.

It is not possible to facilitate segregation on office premises.

9. **NATURAL JUSTICE (Procedural Fairness)**

Procedural fairness is concerned with the procedures used by a decision maker, rather than the actual outcome reached. It requires a fair and proper procedure to be used at all stages of the investigation and decision making process.

Staff should be familiar with and apply the rules of Natural Justice:

Rule 1: No one should be judge in his/her own cause.

Rule 2: The other side must be heard.

9.1 Staff should have no personal, financial or other interest in any case with which they are dealing.

9.2 Staff should not investigate or interview any claim from a relative or personal friend and if they receive any such claim alternative arrangements should be made to deal with it.

9.3 Staff should also be aware of the risk of actual, apparent or perceived bias. This can be conscious or unconscious, due to personal attitudes,

relationships, loyalty to an institution, prior involvement or pre-judgement of the issues or personal opinions which are not grounded by factual evidence and can thus constitute bias.

9.4 All evidence which comes to light which may affect a customer's entitlement must be put to the customer so that s/he can rebut or explain it as the case may be. Where a customer's account or explanation is not being accepted, the reasons why this is being rejected **must** be clearly outlined.

9.5 Where evidence given by a customer is disproved by subsequent investigations, the further evidence must be presented to the customer and an opportunity for comment given.

10. HEALTH & SAFETY

All staff should be aware of and familiar with:

All Health & Safety Guidelines such as the relevant risk assessment for their own workplace. A current risk assessment should be in place for all interview rooms.

The emergency evacuation procedures for the office or location at which the interview is taking place.

Reporting Assaults

10.1 If a staff member is assaulted in the course of his/her official duties s/he must report the incident to the relevant line manager at the earliest opportunity. The Manager must then report the incident to the local Gardaí and facilitate the provision of any statements or details that may be required.

10.2 The matter must also be reported to Health & Safety Unit (Facilities Management Unit) through local line management. In addition, the results of the Garda investigation and any resultant court action should likewise be reported without delay. The Civil Service Employee Assistance Service may be able to offer assistance to the staff member.

Dealing with Difficult Customers

- 10.3 If a staff member anticipates the risk of an assault or intimidation, perhaps due to a previous experience with a customer, the matter should be discussed with their line manager who may arrange for the officer to be accompanied by another staff member.
- 10.4 In cases where staff consider that they may be subject to threats or other forms of intimidation, management should be informed and in turn, advise the customer that their behaviour is unacceptable.
- 10.5 If deemed necessary, management should consider involving the Criminal Assets Bureau (CAB). If staff are dealing with a customer who is known to the Criminal Assets Bureau the staff member must observe the procedures to be followed in relation to dealing with cases which are being investigated by the Criminal Assets Bureau.
- NB. In the event of a threat/assault on staff, managers should be as supportive as possible and see to any follow-up that might be necessary in regard to medical attention or Civil Service Employee Assistance Service (CSEAS) back-up etc.**

11. CUSTOMER SERVICE

11.1 Timely delivery of a quality service to customers is a priority for the Department.

11.2 Staff should organise their work and interviews to ensure that all work items are handled as quickly and accurately as possible.

Requests for information should be reasonable and appropriate and customer given adequate time to respond.

12. DRESS AND APPEARANCE

12.1 Staff should be mindful that, when interviewing customers, they are representing the Department and the Minister and should act accordingly.

12.2 Staff should be clean, presentable, neatly and appropriately dressed at all times when dealing with the public.

12.3 Staff members dealing on a face-to-face basis with customers should reflect this in their personal dress. Clothing with words, logos/emblems, or pictures is not appropriate. Sports and leisurewear should be avoided by staff members, especially those engaging directly with customers in public areas.

12.4 It is at the discretion of staff to insist that customers and any other person present are suitably dressed during an interview. In some circumstances it may be necessary to re-schedule the interview, to allow the customer to remedy the issue. Such an occurrence should be dealt with tactfully by the officer concerned.

13. WORKING RELATIONSHIPS

13.1 Good working relationships should be maintained between staff, colleagues and managers at all times to deal with the ongoing pressures and challenges of our working environment.

13.2 While this code primarily deals with customer interviews, the same principles apply equally to staff meetings and interviews etc.

14. CONSEQUENCES FOR BREACHES OF THIS CODE

It is intended that breaches will be investigated under the Civil Service Disciplinary Code.

ENDS

This Code of Conduct for office interviews is issued by;

Noel Hand
Principal Officer

Customer Interview Card¹



My name is and I am a
(state function).



Thank you for coming here today, you have been asked to attend this office for interview in relation to your (state reason).



The interview should last approximately minutes.



You are free to end the interview at any stage, if you wish, but you should be aware that your claim/payment could be affected should you leave before the interview is finished.



Before we commence can you please turn off your mobile phone. You are not permitted to record interviews with a mobile phone or other electronic equipment as it is against Departmental policy.



To exit this room-just press the exit button and turn the door handle (point out).



In the event of a fire alarm sounding, the assembly area for this building is located and your exit route from the building is as follows



Have you any questions and are you happy to proceed with the interview?

¹ This Customer Interview card should be used in conjunction with the Code Conduct for Office Interviews