Review of the ICO’s approach to unscheduled visitors to the ICO’s offices

Context

The visitor policy has been a matter of some concern to PCS for at least two years and was first raised as a request for the current policy to be revised. Despite this, no further progress has been made and the matter was raised again by PCS at the Joint Committee meeting on 3 June 2011.

At the Joint Committee it was agreed that a working group would be set up to review the visitor policy. On 15 June 2011 a meeting took place with Mike Collins, Paul Arnold and Lesley Bett representing the management side and Simon Ebbitt, Graham S Smith and Paddy Dillon attending on behalf of PCS.

However, at the meeting it quickly became apparent that the management side of the group did not feel they were in a position to take a ‘policy decision’ regarding our request that the ICO’s overall approach to unscheduled visitors is changed. PCS was instead advised to put together a paper for consideration by the Executive Team.

Current policy on unscheduled visitors

Where a member of the public arrives at the office without an appointment and asks to speak to a member of staff, the present approach is for reception to contact the most appropriate department and establish whether someone is available to meet the visitor.

Assuming a member of staff is ‘available’, the implication of the policy is that they are expected to go and meet the visitor. The policy says they should ensure that they do not do so alone, unless the security officer is present while meeting in the reception area.

The relevant extract of the visitor policy is attached at Annex A.
The PCS view

PCS believes the current approach to unscheduled visitors is unsatisfactory and presents unnecessary risks.

We propose that the ICO should amend the visitor policy to say that:

- members of the public who arrive at the office without an appointment will not be able to meet a member of staff; and
- any requests to make an appointment to discuss a complaint being handled by the ICO will be considered at our discretion. We will take into account the circumstances of the particular case, including the identity of the individual and previous dealings they might have had with the ICO, any duty to make reasonable adjustments for the customer, and whether or not there may be operational benefits in discussing their complaint with them.

This should apply to all ICO offices. The reasons for our proposal are outlined below.

In the union’s view, any policy on visitors needs to take into account the following factors:

- The health, safety and welfare of members
- The economic climate and its impact on staffing levels
- The benefits and costs to the ICO and its staff
- The ICO’s mission, vision and values

**Health, safety and welfare**

There have been a number of occasions on which members of staff have felt uncomfortable when meeting members of the public who have turned up without an appointment. Members have experienced verbal aggression and, in some cases, physical intimidation from customers. ICO staff do not receive training in how to deal with customers face-to-face or, in particular, how to deal with potential aggression or violence.

The union contributed to the risk assessment carried out by the ICO and is happy that this important legal responsibility has now been fulfilled. Whilst accepting that no activity is without risk and that the
threats to health and safety are manageable, the risk assessment did identify controls that are reasonably practicable to implement which would help to ensure that any risk is minimised.

Therefore, in the event that the Executive Team is not prepared to agree to our proposal, at the very least we would expect that the additional controls should be implemented in full immediately. This will also require a revision of the current visitor policy in any event.

*Economic climate and effects on staff levels*

These concerns are strengthened by the situation with staffing resources in Facilities. At present, 50% of the team roles have been left as unfilled vacancies. On occasions where the security officer is required to assist a member of staff meeting a member of the public in a meeting room (for private discussions), this means the reception area will be left without a security presence. Additionally, the reduced resource of Facilities staff will make it more difficult for the team to ensure that the reception area is staffed at all times.

*The benefits and costs to the ICO and its staff*

As a result of the ICON posting on 28 September 2011, we are aware of the view of the Operations Directorate Departmental Heads (ODDH) that it is ‘operationally desirable’ for the ICO to deal with unscheduled visitors.

In view of the experience of our members – who are representative of the staff most commonly required to meet unscheduled visitors – PCS fundamentally disagrees with the view of ODDH.

The ICO does not invite members of the public to visit its offices as a form of ‘drop-in centre’. There is a good reason for this – much of the work we do requires a consideration of documentary evidence in support of a complaint. It is extremely rare that any useful business purpose is served when staff meet customers face-to-face without an appointment. Inevitably, these occasions require staff to meet the individual without prior warning and therefore without any relevant preparation for discussing the matters in hand.

In most cases, the meetings are used by members of the public as an opportunity to ‘sound off’ about either the ICO’s handling of their case or the wider matters they are interested in. These ad hoc meetings are often very time-consuming and can serve as more of a hindrance than an assistance to the ICO’s operational work.
The ICO’s mission, vision and values

The union is aware that the Commissioner intends that all strategies and plans produced by the ICO should be clear, practical and effective and that they should reflect the values of the organisation. The Commissioner has recently indicated he wants to review the “how” of “what” we deliver and the union agrees that to secure jobs any review should consider the value for money of current practices.

Initially we would say that there is no suggestion from the union that the ICO should never receive visitors on appointment. It may assist front line staff to have clear guidance on when it is considered good business practice to receive visitors, and therefore there will be some circumstances when receiving visitors on appointment will be of benefit to this organisation’s business.

We are of opinion that our customers should be deterred from visiting without a prior appointment and that staff should not be expected to meet them. We are firmly of the view that a loose policy of receiving any visitor is not good business practice and does not justify the risk to individual members of staff. We acknowledge that risks are small, but however small, staff should not be exposed to any risk unless it can be clearly demonstrated that the risk is justified. To justify a risk it needs to be demonstrated that there is value to the organisation in accepting it.

In relation to the values of the organisation, we would say the following.

Always learning and alert

The fact that something has been an accepted practice in the office does not justify its continuation. Changing current practices to make improvements should not be seen as risking reputational damage. There is a greater risk to reputational damage by continuing with a practice because “this is the way we do things” than in giving proper consideration to its value to the organisation. In considering a clear, practical and effective policy the organisation needs to be alert to risks and alert to practices and examples of recognised good practice elsewhere.
Focused

The current policy is not a focused approach. It appears to say that we do not encourage you to visit without appointment, but if you do call we will see you. A focused policy would result either in a proper face to face service or discouragement of visitors without appointment. Any policy should focus on effective working methods and should balance risks against benefits. Generally, providing an on demand service to any visitor by any member of staff detracts from the focused working methods of those staff.

Effective

If there is evidence that receiving visitors without appointment provides a more effective service for the nature of the work we conduct it should of course be taken into account. However, as outlined earlier in this document, the experience of PCS members is that meeting unscheduled visitors is most often time consuming and more or a hindrance than a help to our operational effectiveness.

Fair

Is it a fair process that those fortunate enough to have the opportunity to press their case in person should be given the opportunity to do so? Is it fair customer service, when those who write to us for advice wait four to five weeks for a reply, that those who call on chance should be given an immediate face to face service? Is it fair to members of staff that, when they are ‘available’ (i.e. working in the office), they should be expected to meet callers who happen to call at reception?

We hope that the Executive Team will carefully consider the points we have made and agree to our proposal to reduce the risks posed to staff and adopt a more sensible and consistent policy on visitors to the office.

PCS Branch Executive Committee
September 2011
Annex A

Extract from current visitor policy

Visitors without an appointment

We should make clear to anyone intending to visit the office that without an appointment we cannot guarantee that a member of staff will be available to see them. However, should we receive a visitor in reception and it is apparent that no appointment has been made our reception staff should establish the visitor’s:

- Full name
- Nature of enquiry
- Whether they have had prior contact with the ICO and have a case reference number where appropriate.

If a visitor is unwilling to provide this information they should be asked by our security officer to leave the premises.

If details are provided to our reception staff they should be used to establish the most appropriate department to deal with the visitor. Our reception staff will then contact that department to establish whether anyone is available to meet with the visitor. If no member of staff is available the visitor should be asked to ring our helpline, make their enquiry in writing or make an appointment at a time more convenient (this is likely to be later the same day). If the visitor refuses to make an appointment but insists on seeing a member of ICO staff they will be asked by our security officer to leave the premises.

Where a member of staff is available they should never see a visitor who has no prior appointment on their own, except if the person is a regular visitor and is known to the person they are visiting.

In most cases it may be appropriate to deal with visitors in our open reception area where our security officer should be present at all times. If the security officer happens to be away from reception when the visitor arrives our reception staff should request security to return. For those visitors who wish to discuss a personal matter it may be more appropriate to do this away from reception in a less
public place. The ICO has several rooms for this purpose. Before any visitor is taken to a room it should be explained to them that:

- Any large bags or belongings they have with them that would not be necessary during their meeting must be left securely with our reception staff.
- During their meeting our security officer will be present in line with our security policy.

Providing that our security officer is present a member of staff may meet a visitor alone. This includes meetings which take place in our reception area.