

## **Guidance on Restricted Use of Electronic Media in Jobcentres v.4.0, June 2013**

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### **Relevant Statutes:**

- **Health and Safety at Work Act 1974**
  - **Management of Health and Safety at Work Regulations 1999**
  - **Data Protection Act 1998**
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### **Summary**

1. Until now, the policy in Jobcentre Plus sites has been that customers cannot use mobile phones or other electronic media within the public areas. This revised guidance allows their use for certain activities.
2. The increasing power of and features available to electronic media, e.g., smartphones, means that our policy has been amended so that “positive” uses are allowed and, indeed, encouraged. Our customers increasingly use these devices to demonstrate jobsearch, scan QR codes and for other uses legitimately related to activity in a Jobcentre.
3. Nonetheless, there are still certain behaviours that are not appropriate in our offices. More detail is set out below.
4. This guidance provides the background to this policy and information for staff on how to manage any exemption requests from customers.

### **Background**

5. When the Jobcentre Plus open plan environment was rolled out, a generic risk review identified that a restriction on the use of mobile telephones and other electronic media was necessary because:
  - We need to prevent customers carrying out any business activity on their phones whilst they are in the public area that might increase the risk for staff and Customer Care Officers (CCOs) who have to interrupt to avoid conflict.
  - There is potential for electronic media to be used covertly to record conversations and visual images. Under the Data Protection Act, Jobcentre Plus as a Data Controller has a responsibility to all customers to protect personal data wherever possible.
6. It has been a long term policy of this Department that filming or the taking of photographs is not permitted in our public areas without the full consent of all staff and customers. Therefore, the restrictions on taking photographs in the public area relate to all types of camera, mobile phone or other electronic media.

7. However, modern electronic media devices increasingly support our work and our customers' jobsearch activities. We ought to encourage and support behaviour such as:
- customers using electronic media for job search activity whilst waiting for their next appointment;
  - scanning QR codes to go direct to UJ, [www.gov.uk](http://www.gov.uk), etc.;
  - e-mailing their CV, e.g., to their advisor during the interview;
  - speaking to prospective employers; and
  - advisers signposting customers to various applications, e.g., LinkedIn, and encouraging them to download links at the time (where the infrastructure supports this).
8. These "legitimate" activities, many of which are being tested in "Office of the Future" and other Freedoms & Flexibilities sites, ought to be allowed and promoted. They may be especially suited to the increasing number of more informal settings in our offices.
9. It will be for staff and CCOs to gauge whether a customer is infringing the legitimate use of electronic media and to advise the customer appropriately. Examples of behaviour that is inappropriate are:
- making or receiving telephone calls that do not relate to our business (but see Paragraph 12);
  - playing music;
  - taking photographs of or filming members of staff, customers or the office in general; and
  - recording interviews or conversations (but see Paragraph 13).

## **Risk Assessment**

10. Sites must consider, at the least, whether a review of the [Claimant Facing Risk Assessment](#) is appropriate when allowing greater use of electronic media into the office. If there is any doubt, a review ought to be undertaken.
11. The Department has a moral commitment to the trade unions representing our staff to implement all control measures identified during the risk assessment process. There is also a legal responsibility to do so under the Management of Health and Safety at Work Regulations. There have been risks identified in regard to use of electronic media in the public area of our offices, and we are required to mitigate those risks.

## **Local Flexibility**

12. Local management always has the option of taking a flexible approach to telephone calls if approached by a customer, e.g., a parent or carer may need to make or receive a call regarding the person for whom they care. Making such

provision available should be the exception and must not increase the risks to other customers or staff.

### **Reasonable Adjustments**

13. There is also a need to be aware of the legal rights of customers, in particular disabled customers, with regard to the recording of their interviews, as this affects how we should deal with any such requests. The guidance "[Recordings by customers during interviews](#)" can be found on the DWP Legal Group Intranet site.

### **Signage**

14. Jobcentre Plus has a legal responsibility to make customers aware of all H&S restrictions which affect them, and they also need to understand the expected standards of behaviour whilst in our buildings. At present, signage consists both of "No mobile phones" and "Recording equipment not permitted".
15. We are working with Telereal Trillium to review signage and make it more specific. In the meantime, however, existing signs should remain in place. Positive uses can be encouraged by staff.
16. Detail relating to the relevant prohibition signage is shown in the Jobcentre Plus Environment Guide (JPEG). Signs are ordered as required via the Telereal Trillium Customer Service Centre.

Operational Infrastructure Services  
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