

EK SERVICES POLICIES AND PROCEDURES

COMPLIANCE OFFICER CODE OF CONDUCT AND PROCEDURE NOTES

INCOME AND PAYMENTS COMPLIANCE OFFICERS

Canterbury City Council, Dover District Council and Thanet District Council have entered into a shared service agreement to allow joint working in the Customer Services, ICT, Benefits, Council Tax and Business Rates sections.

Where 'EK Services' and 'EKS' are mentioned this refers to the shared service between Canterbury City Council, Dover District Council and Thanet District Council.

Where references are made to 'EK Services Officers' these services are now being delivered by Civica UK Limited. Civica UK Limited provides benefit services, income collection services, council tax and business rates administration and collection services and customer contact services to the Council.

Introduction

For the purposes of this Code of Conduct all Compliance Officers working within EK Services shall be referred to as CO's

All Officers are employed in positions of trust and should, at all times, act professionally, lawfully, honestly and with integrity. Any working practice which calls these criteria into doubt will seriously undermine the credibility of EK Services and its client local authorities. As a result EK Services expects its COs to fully comply with this Code of Conduct.

Officer Health & Safety

EK Services takes the safety and well-being of its staff seriously. As a result every effort must be made to ensure officer safety at all times - in particular during visits that can lead to heightened tension, threats of violence or official complaints. EK Services will provide COs with all relevant training and equipment to minimise any risks to them or the organisation, to enable them to undertake their duties to the best of their ability. Officers should note that in order for them to be effective adherence to the procedures within this code must be absolute.

Training

As a minimum, COs will be expected to undertake training on Personal Safety Awareness and Conflict Management, and Safeguarding of Children. It is the responsibility of each officer to raise any training needs with their line manager. Disregard of safety practices, procedures and rules may constitute misconduct under the council's disciplinary rules and may therefore result in disciplinary action.

Safeguarding

Statutory guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004 was published in August 2005. The guidance came into force on 1 October 2005 and sets out what is expected of District Councils. Clients of EK Services have a right to expect that EK Services will provide a level of service that meets the requirements of the Children Act 2004.

EK Services CO's are front-line staff and as such are categorised as Category B staff, under the above Act, for the purposes of Criminal Records Bureau (CRB) checking, and safeguarding. In accordance with this all COs will be subject to CRB checks. If COs have concerns for a child's safety then they must make a written record of their concerns on the 'Incident/concern' form (Appendix A of the council's Child Protection and Safeguarding Children Policy and Procedure), which is available on the council's website and intranet. They should then pass this form to their line manager or to their Lead Officer for Child Protection.

Equipment

EK Services will provide CO's with all the equipment they need to undertake their duties. This will include street map books (and Ordnance Survey maps where required), protective footwear, hi-visibility jackets, hard-hats, torches, personal attack alarms, first aid kits, mobile phones and any other equipment deemed necessary by the CO's line manager.

GENERAL RULES FOR ALL COMPLIANCE OFFICERS

- When visiting customers, staff will **always** carry identification cards and will **always** present these before entry to any premises. No officer has a right of entry to a private property without the permission of the owner. CO's should only enter premises if invited to do so by the occupier or landlord. If at any time during a visit the CO is asked to leave, they must do so immediately. A note should be made at the time (or as reasonably practicable afterwards) as to the reason why they were asked to leave. The officer should submit a report (to their line manager) of the events leading up to the customer requesting that the CO leave the property. This is so that there is a contemporaneous report of events should the customer subsequently wish to complain.
- CO's will at all times be aware of the possibility of compromising their integrity, or that of EK Services and its client councils, by carrying out unaccompanied visits. COs should seek advice from a team leader prior to carrying out unaccompanied visits in the following circumstances:
 - Visits to individuals with known mental health problems which lead them to be violent or aggressive;
 - Visits during non-daylight hours or 'out of hours' (see special procedures below);
 - Visits to hostels or accommodation providing Care in the Community;
 - Visits to individuals considered to be potentially violent.
- CO's must adopt a common-sense approach when visiting addresses where children are known to be present and/or the address is occupied by single women/men. They should be aware of the possibility of allegations of impropriety and should therefore take appropriate steps to reduce this risk. For example:
- If the door is answered by a child who invites the officer inside, entry to the premises should not be undertaken until the householder has been seen and agrees to entry. Similarly if the door is answered by any person in a state of undress/partial dress then the officer should say that they will return when it is more convenient for the customer or consider asking the customer to dress more suitably. If the officer is in any doubt as to whether it is appropriate to enter the premises then entry should not be made.
- Any instances where the above applies should be recorded on a report sheet and the appropriate computer systems when the officer returns to the office. A copy of the report should be passed to the officer's line manager.
- COs should not enter a property where it appears to them that any of the occupants are under the influence of drink or drugs. CO's must be aware of the potential for violence from persons they are visiting. They must not place

themselves in a situation where there is a risk of attack. In particular, CO's should check all records to see if a person is registered as having mental health problems or known to have been potentially violent in the past, prior to any interview or visit. CO's should not carry out unaccompanied interviews or visits to anyone with known mental health problems or potentially violent individuals.

- CO's must observe their surroundings, and exit routes and be aware of any items that could be classed as dangerous. CO's must be aware of doors being locked and should try and follow the occupant, rather than allowing people to be behind them.
- If any threat of violent conduct is made against a CO then the CO must complete a report of the events leading to the threat being made, and pass this to their line manager so that details of the threat can be discussed and consideration given to completing an incident report form for inclusion on the client council's PVP list.
- CO's must not, under any circumstances, accept any food or drink whilst visiting a property.
- If a complaint is made against any officer during the visit, the officer will pass a full written report of the allegation to their line manager.
- CO's must wear work issued clothing where supplied or dress appropriately, according to the type(s) of visit being undertaken. For example, it may not be appropriate to wear a smart suit to visits, or expensive jewellery.
- All CO's must at all times ensure that they are contactable by mobile phone, whilst conducting official business on behalf of EK Services. All CO's must ensure that they contact the nominated person at the end of the working day, if they do not intend to return to the council offices.
- EK Services does not allow employees to use a mobile phone whilst driving on official business. This includes:
 - Text messaging - Videophones
 - WAP functions - Picture taking
 - Holding a phone between ear and shoulder
 - A passenger holding a phone to the driver's ear
 - Using any hands free kit (and blue tooth technology)
- A CO will not be considered to be driving when the vehicle is safely parked and the engine switched off.
- All CO's must at all times ensure that their whereabouts are known whilst conducting official business on behalf of the Council. CO's must enter all

intended visits to premises or individuals into the diary sheet. It must clearly indicate a start and completion time of a visit.

- COs will always be mindful of their responsibilities under the current data protection regulations, and the Human Rights Act 1998.
- COs should not visit any member of the public who is a relative or friend. If a visiting officer has been requested to visit someone who is known to them in this way they should bring the matter to the attention of their line manager.
- CO's should not accept cash from customers under any circumstances unless they are in attendance at a Council Tax or Business Rates Liability Order hearing or County Court.
- COs should never leave confidential documents relating to customers on display in their vehicle whilst the vehicle is unattended. If it is not practical to carry them they should be securely locked away in the boot of the car.
- If a CO notices any irregularity which leads them to believe a benefit claim may be fraudulent then this should be referred to the Payments Team at the earliest opportunity.

ADDITIONAL RULES FOR ALL COMPLIANCE OFFICERS

All CO's will observe the following rules which are in addition to the general rules above governing all CO's conduct.

- All CO's must sign an annual 'Declaration' that prohibits them from dealing in any way with any Council Tax, Business Rates or Benefit accounts of any family, friends, or any person known to them. This is the same declaration that all staff within EK Services sign. Any breach of this will be dealt with as a disciplinary offence.
- CO's will, at all times, ensure that information held by EK Services is only disclosed in line with the current data protection regulations and the procedures concerning confidentiality.
- The 'operational' visiting procedure is detailed below. This applies to all CO's. Any CO found to have breached the above rules will be subject to the Council's disciplinary procedures.
- This document must be read in conjunction with any Health and Safety Policy, Staff Code of Conduct, Lone Working Policy, Child Protection and Safeguarding Children Policy and Procedure and Anti-Fraud and Corruption Policy.

COMPLIANCE OFFICER OPERATIONAL PROCEDURES

The procedures outlined below are a 'checklist' for CO's and must be followed in all cases. This is to ensure of the CO's personal health and safety.

- Always leave a list of your visits (on a diary sheet) with the route you intend to take with your nominated contact.
- Always ensure that your phone is adequately charged for the anticipated usage and remember to take it with you. Keep your phone switched on and with you at all times.
- Never use your mobile phone, even hands-free, whilst driving on official duties. This is for your own Health & Safety (see notes above, under 'General rules').
- Take your personal attack alarm with you.
- Physically hand your ID card to the householder, state your name and tell them that you are from the relevant Council. Ask them to compare your face with the photo on your card and say they must do this before you enter the property. Clearly explain the purpose of your visit.
- Make it clear to the householder that you will not enter unless they are happy for you to do so. Tell them that you can return at a later date if the householder requests this.
- If you deviate from your intended route always telephone base office to give details of the deviation.
- Please inform base office if you go straight home after your last visit.
- Remember if you do not feel comfortable in any certain situation there is probably a good reason for this. If in doubt do not carry out the visit.

PROCEDURES FOR ‘OUT OF HOURS’ AND EVENING OR ‘NON-DAYLIGHT’ WORKING

Within Income and Payments the need for out of hours and evening/‘non-daylight’ visiting should be rare, but it does occur and needs special arrangements in place to ensure the health and safety of CO’s.

For the purposes of this document any work done in non-daylight hours, or after 18.00, or at weekends, is considered to be out of hours or evening working. This includes visits in the morning when it is not yet light. All of the above conditions still apply and must be adhered to. However, it may not be possible for CO’s to report into the office, as the office may be unmanned. Therefore, COs should ensure that their line manager (or nominated responsible officer) is left with a list of customers names, addresses, telephone numbers (where held), estimated time of arrival/departure, and reason for visit.

It is the duty of the line manager/responsible officer to ensure they hold this list with them until the CO has completed their tour of visits. The responsible officer must ensure they are contactable by mobile phone, therefore all CO’s should know their responsible officer’s contact details (and vice versa).

CO’s must contact the responsible officer after EACH visit. This is so that the responsible officer knows the current location of the CO and at what time each customer has been seen. The responsible officer should note the time on their copy of the visiting list after each call. The CO must also call the responsible officer once they arrive back home. This is so that the responsible officer knows all is well and can switch off their mobile phone. It is imperative that this call is made by the CO. Text messaging should on no account take place, as the responsible officer cannot be sure it is actually the CO using the phone.

There should be no un-notified visits before 07.00 or after 20.00 without exception. Visits in non-daylight hours should only take place where there is a valid reason for doing so and with line manager authorisation. Line Managers must judge whether or not there is a business need for such visits.

EK Services

Introduced: 1 December 2015

Updated: 1 May 2018