



EASO

Practical recommendations
on conducting the personal
interview remotely

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Practical recommendations on conducting the personal interview remotely

About the guidance

This brief guidance has been developed in response to challenges faced by EU+ States when conducting remote personal interviews. Its compilation is built on the following sources:

- Information provided by EU+ States on conducting remote personal interviews through surveys and during practical cooperation meetings;
- EASO practical tools, including:
 - *EASO Guidance on asylum procedure: operational standards and indicators;*
 - *EASO Practical guide: personal interview;*
 - *EASO Practical guide: evidence assessment;*
 - *EASO Tool for Identification of Persons with Special Needs.*

The aim of this guidance is to provide practical recommendations on the organisation of remote personal interviews based on good practices from across the EU+ States and existing EASO guidance. Furthermore, based on operational standards and indicators and good practices, this document elaborates procedural safeguards and practical recommendations that asylum authorities may want to consider when preparing and conducting a remote personal interview.

As a basic consideration, it is worth highlighting that the quality of a personal interview certainly goes beyond the substance. This encompasses a wide range of preconditions and arrangements whose availability and eventual set-up are crucial to ensure the efficient and effective conduct of the personal interview. Following such basic considerations, the present guidance elaborates the following relevant aspects of a remote personal interview:

- technical arrangements, security and confidentiality;
- practical arrangements prior, during and after the interview;
- legal considerations;
- interview techniques and quality-related consideration;
- vulnerability-related considerations.



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I. Introduction

In normal circumstances, being physically present when conducting a personal interview is the preferred practice across the EU+ States¹. The majority of EU+ States generally do not conduct remote interviews. Exceptions are made by a number of countries that conduct remote interviews with applicants in detention, applicants accommodated in remote reception centres or, and most frequently, when no professional interpreter is available in person. The existing experience with remote personal interviews amongst the EU+ States is therefore limited.

As a consequence of the restrictive measures introduced in March 2020 to combat the COVID-19 health emergency, most EU+ States have suspended personal interviews. Suspensions were made as it was deemed too difficult to conduct the personal interviews while complying with the social distancing measure introduced to contain the spread of the virus. As such, EU+ States started exploring the use of remote personal interviews more broadly.

In extraordinary circumstances, remote personal interviews seems to represent a viable alternative to ensure business continuity in asylum determination procedures. EASO is fostering communication amongst EU+ States in order to facilitate the exchange of good practice as well as the identification of coping mechanisms applicable to different national contexts. While the health emergency has been playing a crucial role in paving the way to a more extensive and frequent use of remote personal interviews, EU+ States may also consider resorting to such a modality in normal circumstances provided that it proves an *efficient modus operandi* in asylum processes.

This guidance aims to provide a reference context for remote personal interview, which could be conducted in both normal and extraordinary circumstances.

II. Technical arrangements, security and confidentiality

The preparation to conduct a personal interview in the presence of the applicant for international protection and the interpreter requires practical arrangements related to the appropriate interview rooms and confidentiality. These are generally well established by the determining authorities². In the case of remote personal interviews, on the other hand, **specific technical minimum requirements** need to be set up. This includes proper internet or intranet connections to ensure the quality of the interview, as well as data-protection mechanisms to comply with the obligation of confidentiality of information.

¹ EU+ States are Member States of the European Union plus Norway and Switzerland.

² EASO, [Practical Guide: Personal Interview](#), 2014, '1.3. Practical arrangements', pp. 4-5.



Based on the available information from those EU+ States that organise interviews with applicants through videoconference (VC), the relevant practices in relation to technical aspects, security and confidentiality considerations are gathered below.

Technical aspects, security and confidentiality arrangements

The videoconferencing system used is a secure system with VC unit in the detention centre and the central offices of the asylum authority. The asylum seeker is alone in the VC room in the detention centre. For the personal interview by the asylum authority, the applicant can be assisted by their lawyer and/or a person of trust. All technical measures are taken to guarantee confidentiality. The interpreter is in the VC room with the interviewer.

Remote personal interviews through VC are applied when there is no interpreter present who can speak the applicant's language. All territorial reception centres possess the technical ability to conduct a VC when it is necessary. The applicant is notified that the communication with the interpreter will be in the form of a VC. The connection is encrypted. All interpreters have signed confidentiality statements.

Experience with remote interviews is related to the provision of interpretation services through VC.

Secure connections ensure confidentiality.

Remote personal interviews have been conducted through IP Phones (phones using the internet protocol), connected safely with the Police Network. They are mainly conducted for interpretation services, if the interpreter's physical presence is not possible. Exceptionally, this method has been used in situations where the case officer needs to make an additional interview and the applicant has been transferred from the initial location. In these situations, there is a case officer present in the same room with the applicant.

Remote personal interviews have been conducted in cases in detention centres or semi-imprisonment conditions and in cases of vulnerable persons as well. The dedicated office space required in such a situation has been previously visited by the members of the asylum authority in charge of the confidentiality and in accordance with the ministry of interior. Interpreters are present at the asylum authority.

Applicants (except for unaccompanied minors under 14) are placed in the transit zones. Personal interviews are carried out via distant VC within a closed IT system. Translators are also involved in the interview via this closed VC system. The VC network is closed and cannot be accessed unauthorised people. They can only be accessed from certain access points that are available at some buildings of the asylum authority, transit zones and at the competent courts.

The technical possibility to do VCs exists, using a secure browser-based service, based on Pexip meeting platform, hosted on the relevant servers and customised for the relevant needs. Remote personal interview has been conducted in cases of interpretation needs in rare languages. In this context, they started to use this possibility in detention and reception centres.

It applies to asylum seekers placed in detention facilities. A police secured Internet connection is used. The interpreter is in the room with case officer.

Procedural safeguards and practical recommendations

The following minimum technical requirements are recommended to conduct a remote personal interview:

- **Equipment:** laptops, tablets or even phones along with a headset and a stable internet connection. The equipment needs to be reliable and of good quality. To this end the screen size, the quality of the image and of the sound as well as the safety and quality aspects of the internet connection should be taken into account.
- **Services and programmes/platform:** the most well know vendors are CISCO for WebEx Tools, Microsoft for Skype for Business and Teams, Polycom for IP phones and telepresence.
- **ICT helpline:** it is recommended to have an ICT-helpline available to all participants to assist with the setting up of the call or to intervene when the connection is broken.
- **Confidentiality and security:** enforce a meeting password when joining by phone or video conferencing system as well as a disclaimer to any attendee (including a host). The set-up of a strong password which protects the online meeting from unauthorised participants as well as the use of different passwords each time will ensure a much more secured connection and communication. The same specialised vendors provide encrypted connection to audio and video-conferencing and rely mostly on highly-secured Cloud systems, which are easier to access also for external partners. The baseline Internet connection should be established through VPN or similar tunnelling protocols.
- **Recording the interview,** where permitted by national legislation, is an added value offered in most videoconferencing systems. Minimum requirements are that the recording can be stored in a secured place and that measures are put in place to avoid the applicant recording the interview for themselves. It is advisable not to allow the applicant to bring mobile phones into the VC room.
- **Data Protection:** It is possible to stipulate specialised contracts with video conference providers that only servers located within the EU/Europe can be used. In the case of Cisco and Microsoft, the security aspect can be customised. Reference is made as well to a set of Security best practices and 'white papers' available at the respective vendor's website.

- Where concerning **case officers working from home/teleworking**, a strong internet connection and good quality office equipment are recommended following the instructions/security policies recommended by the competent ICT services. The use of an extended desktop configuration (i.e. two monitors) is suggested as well as a silent keyboard where possible. The use of headphones is important to avoid information being overheard by any other person in the case officer's surroundings. Moreover, case officers must save the audio recordings in the service's system/shared drive and delete it from any personal storage immediately, while any recordings are not to be sent by private e-mails and/or by applications non-authorized by the competent ICT services. In cases of working from home/teleworking, the technical equipment should satisfy the requirements mentioned above as well (*under equipment point*).

III. Set-up of a remote personal interview and quality standards

As laid out in Article 15 Asylum Procedures Directive (APD)³, specific requirements are to be put in place by the determining authorities in order to ensure the smooth functioning of a personal interview. Such requirements are to be considered during each phase of the personal interview i.e. prior, during and after the interview.

- The set-up of the interview room ensures confidentiality;
- The case officer is properly trained and is well prepared on the content of the files to be processed;
- An efficient interpretation system has been organised; and
- Specific arrangements for people with special needs have been anticipated and prepared.

In the context of the remote personal interview, the abovementioned requirements are to be met despite the fact that the three main participants of the interview (applicant, case officer, interpreter) are not in the same room.

These legal requirements are operationalised in the [EASO Guidance on asylum procedure: operational standards and indicators](#). When organising personal interviews remotely, invitation letters will have to be adapted to inform the applicant accurately about the modalities of the interview. Specific guidelines on the set-up of the VC rooms for all parties need to be set out in order to ensure confidentiality and to ensure that the interviews are not unnecessarily interrupted. Special arrangements may need to be made to allow third parties, who are normally permitted to attend

³ Directive 2013/32/EU of the European Parliament and of the Council of 26 June 2013 on common procedures for granting and withdrawing international protection (recast)

interview, to follow the interview remotely. Just like during a face-to-face interviews, case officers will need to ensure their clothing is appropriate and fit for purpose⁴ and the same will apply to the background of the VC, both in terms of noise and what is visible behind the case officer.

Existing practices

The table below presents relevant examples of good practice related to remote modalities. These examples are based on information from EU+ States that have experience organising remote personal interviews.

The set-up of a remote personal interview

Remote interpretation in a limited number of cases and for short remote sessions has been used. Interviews can be also conducted by telephone for very short interviews of less than 45 minutes, mostly for questions related to registration, Dublin or leaving the country after a negative decision.

VC has been used since November 2019 due to the geographical distribution of the accommodation of applicants, in particular where applicants are in a remote location. The applicants in the remote location are assisted by another officer and they are provided with the necessary technical support.

Facilities of the justice department are used in order to conduct remote personal interviews, which has helped to ensure a secure network and to have more control over the facilities. They are also considering other sister agencies where appropriate rooms can be used, such as court services that have premises throughout the country.

The role of facilitating staff deployed on the sites is key, in order to have an overall overview, to control security aspects, to ensure technical support and to provide assistance to the applicant.

Applicants are allowed to have a legal representative along with them while for vulnerable applicants, usually VC is not applied. Regarding the documents submitted, facilitating staff can go to the interview room and scan them accordingly.

Remote personal interviews have been conducted via Skype since 2017 in various regions when deemed necessary for reception centres that are remote or not easily accessible, or when the case-load is high.

Information about confidentiality is provided to the applicant, and the staff at the reception centre will be requested to give the applicant a separate room where the interview will not be interrupted. The interpreter is present either with the applicant or with the case officer.

⁴ For more details on the appropriate officer and interpreter, room set-up and security concerns, see EASO, [Practical Guide: Personal Interview](#), 2014, '1.3. Practical Arrangements', pp. 4-5.

In cases where the applicant is accommodated far from the office of the responsible case officer, a remote interview can benefit the applicant as it removes the need to travel. Before using a VC for a personal interview, the case must be considered suitable and the needs of the applicant should also be considered. This type of personal interview may not be suitable for a traumatised applicant, or an applicant with hearing or sight disabilities. The interview takes place through an internal VC system with a secured solution. Ideally, the interpreter is in the same room as the interviewing case officer. In exceptional cases, the interpreter can sit in the same room as the applicant. The possibility to conduct interviews through Skype, where the applicant is one room, the case officer in another room and the interpreter is either in another room or connected through VC is considered.

Procedural safeguards and practical recommendations

- Invest in **additional information provision** on how and why the personal interview will be conducted remotely before the start of the interview, such as information provision on the sharing and 'delete' practices applied for the recordings. In the invitation letter, in addition to the clear statement of the modalities of the interview, additional information on how the remote interview will be conducted and which safeguards will be put in place should be provided. This will help applicants overcome any reluctance they may experience when informed that the interview will be conducted remotely.
- **Remote personal interviews should preferably take place in reception centres**, as reception centres are most likely to be able to secure a dedicated room for the VC that ensures confidentiality as well as compliance with basic quality standards for the interview. Moreover, reception centre staff can control who attends the VC and verify the identity of the applicant. If the interview is not conducted in reception centres, it is for the case officer to verify the validity of the applicant's identity who connects remotely. The applicant shall be able to talk undisturbed, and information shall not be heard by unauthorised persons. It shall be clear that, in order to avoid disturbances, there must be an indication that the relevant room is occupied. They are also to be provided with the requested IT equipment to carry out the interview.

On the side of the asylum authorities, cooperation with the reception centres is to be strengthened. Reception centres may play an important role in mitigating potential challenges arising in remote settings through, for instance, providing specific information on an ad hoc basis in the form of a briefing to the applicant. These briefings would explain to the applicants how the personal interview will be conducted, and provide instructions in case the connection fails. Staff of the centres can also assist with the signing and scanning of interview reports, as necessary. Furthermore, it is of paramount importance that the reception centre staff is easily reachable during the remote personal interview, not only for

addressing any technical issues but also in the event the applicant needs assistance of any nature. Additionally, right after the interview, staff of the centres will play an additional role in counselling the applicants when necessary⁵. It is therefore recommended that staff of the centres are assigned additional responsibilities compared to the ones held in normal circumstances. In this way, authorities can ensure that the remote interview does not only take place in proper technical and logistical conditions, but that also asylum-related information about the procedure is clearly understood by the applicant⁶.

- To **submit evidence and other relevant document during the personal interview**⁷, a copy of the evidence can be sent by email to the case officer by the staff of the facility. The originals should be kept available by the applicant in case further investigation of the authenticity of the document is needed. An alternative good practice is to verify the authenticity of relevant supporting documents at the time of the registration and/or lodging of the application.
- **Applicants can be accompanied by a legal representative** sitting in the same room while respecting social distancing measures. Similar arrangements could be put in place for guardians of unaccompanied children in the event that the remote personal interview is deemed appropriate and suitable for the child.
- As an alternative to reception centres, any **possible use of facilities and premises** belonging to local branches of other national/local administrations should be assessed.
- **If case officers are permitted to conduct the interview from home**, they should hold the interview in a separate room behind closed doors that are either locked or marked with a 'do not disturb' sign. Case officers should use headphones to avoid being overheard. No other person besides the case officer can be present in the room. The case officer should set up a neutral screen background in order to make the interview environment as professional as possible. IT equipment and a proper internet connection should be in place⁸.

⁵ As listed in EASO, [Guidance on asylum procedure: operational standards and indicators](#), 2019: 'applicants are informed about the steps of the procedure and the applicable timeframes (Indicator 20.3). The information on the different steps of the procedure is provided in a timely manner to enable applicants to exercise their rights and to comply with the obligations (Indicator 20.5). The personnel that provide information, clarifications and explanations have the necessary knowledge and skills (Indicator 21.2)', p. 15.

⁶ For more details see EASO, [Guidance on asylum procedure: operational standards and indicators](#), 2019, 'Standard 22: Ensure that information about the procedure and their individual case can be understood by the applicant', p. 15.

⁷ The applicant has to be allowed to submit all the elements needed to substantiate the claim during the interview. For more details, see EASO, [Guidance on asylum procedure: operational standards and indicators](#), 2019, 'Standard 33: Conditions for conducting an adequate interview are put in place', p. 21.

⁸ EASO, [Guidance on asylum procedure: operational standards and indicators](#), 2019, 'Standard 31: The interview rooms are appropriate to conduct personal interviews in full respect of confidentiality and security' p. 19.

IV. Legal considerations

European Union legislation and most national legislations of EU+ States do not provide for specific provisions regulating **modalities** for conducting the personal interview to the extent that the possibility to conduct personal interviews remotely is *a priori* excluded. As a consequence, Articles 14 to 17 APD regulating the *modus operandi* of the personal interview continue to apply, irrespective of the remote character of the interview. Similarly, the operational standards and indicators elaborated in the *EASO Guidance on asylum procedures*, and in particular those related to personal interview, remain applicable.

Procedural safeguards and practical recommendations

- Where an interview report or transcript is written up, the applicant is commonly requested to sign the report or transcript after being provided the opportunity to make comments or provide clarifications. This is done so that they may confirm that the report or transcript correctly reflects the interview. To overcome potential challenges arising from the remote setting, staff of the reception centre or branch office where the interview takes place can assist in printing the document to be signed by the applicant. Once signed, staff can further support in scanning the document and sending it the concerned case officer. Depending on the national legislation, the original signed interview transcript, report or consent form can be sent in a secure way to the office of the determining authority. A similar procedure can be followed with the interpreter, if they are participating from a third location.
- When technical problems occur during the interview, this should be noted down in the interview report, indicating what type of problem and how long it lasted. This will increase the overall reliability of the interview report.
- In those national legislations that permit the recording of the personal interview, the VC setting often facilitates the recording and reduces the risk of recording failures passing by unnoticed. Further, where the recording can also be made available as evidence in the appeals procedure, the question of obtaining the applicant's signature on the interview report or transcript is precluded as there is no requirement for the applicant to confirm the content of the report or transcript. Nor is there the need to read the transcript back to the applicant who doesn't need to sign it.
- Applicants could potentially refuse to participate in an interview conducted remotely because they feel neglected or because they are afraid that their case may be jeopardised. In such circumstances, the below listed mitigation interventions are recommended:
 - The administration can provide the applicant with additional information about the remote personal interview thus encouraging them to overcome their reticence, which is most likely due to lack of understanding.

- The administration can always consider, through a case-by-case assessment, to postpone the personal interview whenever applicants raise good reasons for not conducting it remotely. In general, allowing applicants to choose to participate in a remote personal interview is considered good practice.
- General advice should be provided to the administration to conduct a case-by-case assessment on the suitability of remote interviews.

Omitting the personal interview

As described in the *EASO Practical guide: evidence assessment*⁹, it is the duty of the case officer to provide the applicant with the opportunity to submit any relevant evidence and to investigate the available evidence. The personal interview will, in most cases, be the main source of evidence for the case officer when assessing the application. It is therefore essential that the interview is conducted in such a manner as to ensure that high quality evidence is obtained from the applicant.

In some circumstances, remote personal interviews could be omitted and a positive decision taken in line with Article 14(2)(a) APD. In the majority of EU+ States, the personal interview may be omitted when it is possible to take a positive decision on the basis of the evidence already available¹⁰. In particular, this can be applied in ‘clear-cut’ cases, when, for instance, a decision can be issued based on the information available from the file, by considering different indicators such as the specific profiles and the absence of indicators that would trigger any exclusion or security considerations. In order to be able to omit the personal interview, sufficient information on the profile of the applicant and the reasons for the application need to be collected at the lodging phase. It could be considered to expand the lodging phase with extra questions on the profiles of applicants and further investigation of the evidence submitted, in particular for countries of origin for which an omission of the personal interview might be possible. Such a procedure can be complemented with an additional request for information or evidence in writing¹¹. A quality control system under which these decisions are regularly reviewed can ensure that the omission of the personal interview is only done in duly justified cases.

⁹ EASO, *Practical guide on evidence assessment*, 2015, ‘1.3. Collect pieces of evidence relevant to the material facts’, pp. 6-9.

¹⁰ Findings from the Quality Matrix Process and in particular the update questionnaire on Personal Interview (2019) which has been answered by 21 EU+ States.

¹¹ For the written statements as further evidence in support of an application and other pieces of evidence, see EASO, *Practical guide on evidence assessment*, 2015, ‘1.3. Collect pieces of evidence relevant to the material facts’, pp. 6-9.

Furthermore, whenever permitted by national legislation, consideration could be given to conduct the preliminary examination of a subsequent application under the admissibility procedure without holding a personal interview, in line with Article 34(1) APD.

V. Interview techniques

The techniques that are applied during the personal interview represent another crucial aspect for the examination of the asylum application. The quality of the outcome is directly linked to an efficient interview. Training is the only way for case officers to acquire the required knowledge to properly conduct an interview. The *EASO Practical guide: personal interview* also provides practical tips for case officers that can be applied in the different phases of the interview: during the opening of the interview, when conducting the interview and during the closing of the interview¹².

Procedural safeguards and practical recommendations

In the context of a remote personal interview, specific adjustments of the interview techniques are required in order to ensure a proper analysis of the claim.

Procedural safeguards and technique adjustments for a case officer to keep in mind include:

- welcoming the applicant and ensuring reciprocal personal presentations at the beginning of the interview;
- directing attention towards the applicant at all times;
- maintaining eye contact with the applicant and the interpreter as much as possible;
- using simple and clear language as well as short sentences;
- all participants can clearly see each other through the camera so that body language is not hampered;
- engaging in active listening and clarifying any misunderstandings as soon as possible;
- resolving any ambiguity and/or misunderstanding during the interview;
- allowing the applicant to take more breaks than would be taken in a face-to face interview.

EASO's relevant training modules that can be helpful include:

¹² See analytical checklists for each phase of the personal interview at the beginning of the practical guide.

- **Interview techniques:** explains the relevant methodology to be followed during a personal interview. This module does not, however, make reference to remote personal interviews as the module is based on the presumption of physical presence for the personal interview.
- **Module for interpreters:** dedicated sections are devoted to remote interpretation, including challenges, tips, and tricks that can be used.

In this context, it can be noted that EASO is offering a training course on the remote personal interview in the form of a webinar.

VI. Vulnerability considerations

Procedural safeguards and practical recommendations

There are three main considerations to be taken into account when conducting remote personal interviews with vulnerable groups:

- **principles of non-discrimination, inclusiveness and participation;**
- **preparedness;**
- **individualised response.**

The principles of non-discrimination, inclusiveness, and participation are crucial to ensure all applicants can benefit from the rights enshrined in the Common European Asylum System. These principles are even more important to applicants with special needs. In particular, inclusiveness entails a proactive approach to remove barriers to the enjoyment of rights, in a way that all persons have equal access to services and opportunities with regards to access to services and opportunities. Inclusiveness starts with the design phase, where services are made available to the greatest extent possible to all applicants, and it continues through the implementation of all activities. Participation requires cooperation with those benefitting from the services. Participants should be able to voice their concerns and views and have their propositions properly considered

In terms of preparedness, as it is never possible to predict which applicants may have special needs, some activities have to be carried out before the remote interview takes place. This includes:

- **Information provision tailored to persons with special needs,** to explain the interview modalities, and give them the possibility to decide whether to participate.
- **The set-up, including arrangements to allow persons with special needs to participate** in the remote interview on equal footing with other applicants. These familiarisation activities could include, for instance, this could be achieved by having an online sign language interpreter, by providing the appropriate equipment, some hardware/software tools (such as assistive technology), as well as by setting up the room in the appropriate way (a

wheelchair should fit under the desk; hands should be able to reach and operate the keyboard)¹³. For this reason, gathering information on the individual case during the familiarisation is an important step¹⁴.

- The importance of providing an **individualised response**: the applicant's needs should be addressed prior, during and after the interview, in a tailor-made manner and according to the individual applicant. Identification of special needs can be carried out at any phase of the asylum procedure¹⁵, including during the remote interview.

It is important to note, however, that for certain vulnerable groups, such as survivors of torture, LGBTI cases or highly traumatised applicants¹⁶, for whom an extended and detailed interview would be needed, a videoconferencing setting may not be appropriate¹⁷. A case-by-case assessment is recommended in such cases. To that regard, *EASO Tool for Identification of Persons with Special Needs* can be used in order to facilitate the timely identification of persons with special procedural and/or reception needs.

Further considerations

It is worth highlighting that for some applicants a remote personal interview can be beneficial, especially for those facing issues in commuting and spending a night away from their accommodation. Such a consideration could be of particular relevance for applicants with special needs (physical impairment for instance) who might have issues travelling. In some cases, a remote personal interview can be beneficial for vulnerable applicants as well, as it might sometimes be easier for them to present sensitive information.

The above being said, it is generally acknowledged that for particularly complicated cases, remote personal interviews pose particular challenges. This could be the case, for example, for exclusion analysis, cases with substantial credibility issues and/or for some vulnerable categories such as

¹³ As listed in EASO, [Guidance on asylum procedure: operational standards and indicators](#), 2019, '10. Provision of information and counselling: Information is provided in a manner that takes into account taking into account the special needs and individual circumstances of applicants (Indicator 22.4)', p. 15.

¹⁴ For further information see EASO, [Practical Guide: personal interview](#), 2014, '1.2.1. Gather information on the individual case', p. 3.

¹⁵ See also EASO, [Guidance on asylum procedure: operational standards and indicators](#), 2019, '9. Procedural guarantees for special needs', p. 24.

¹⁶ On categories of vulnerable persons see also Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection (recast) where some examples are mentioned (non – exhaustive).

¹⁷ UNHCR, [Operational Guidance Note on conducting resettlement interviews through videoconferencing](#), February 2013.



survivors of torture or applicants with serious psychological problems¹⁸. Any list of potentially exempted profiles may run the risk of not being exhaustive, therefore it is generally recommended to proceed with a case-by-case assessment. This is in order to identify relevant indicators that would lead to the conclusion that a face-to-face personal interview is preferable.

¹⁸ On assessment of special needs of vulnerable persons and appropriate monitoring of their situation (regarding reception) see also in parallel article 22 (1) of Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection (recast).