



Call Recording

V1.0

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Introduction

Chichester District Council (CDC) has a telephone recording system in the Customer Contact Centre (CCC) and the Revenues and Benefits Client Support Team (CST). Like many other organisations, this is a standard practice that allows the recording of telephone calls for quality monitoring, training, compliance, security and safeguarding purposes.

All calls received into and made from the CCC and CST are recorded and retained for a period of six months. When calls are transferred from CCC or CST to another officer in the authority the call will continue to record.

Purpose of this policy

In order to maintain high standards and protect the public and staff we record all telephone calls received into and made from CCC and CST and they are retained for 6 months. Access is limited to those senior officers/managers needing to listen to calls in order to carry out a function of the Council as a public body, or as an employer.

We ensure that the use of the recordings is fair and that we comply with the requirements of relevant legislation. This includes:-

- Data Protection Act 1998
- General Data Protection Regulations (GDPR) 2018
- Regulation of Investigatory Powers Act 2000
- Human rights Act 1998
- Telecommunications (Data and Privacy) Regulations 1999

Scope of policy

All calls received into and made from CCC and CST are recorded and stored as a data cache. Under normal circumstances a call to the Council will not be retrieved monitored or otherwise listened to by any person unless:-

- It is necessary to investigate a complaint or a fine that has been issued.
- It is part of a management 'spot check' to ensure customer service standards are being maintained
- It has been identified as abusive or threatening
- There is a threat to the health and safety of staff or customers or for the prevention or detection of crime
- It is necessary to check compliance with regulatory procedures
- It will aid standards in call handling through use in training, coaching and performance development of staff
- It is for safeguarding purposes

Decisions as to whether the above conditions are met will be made at the discretion the Divisional Manager Customer Services, Divisional Manager Revenues and Benefits or Director of Residents Services or the Data Processing Officer to the Council.

Collecting information

Personal data collected in the course of call recording will be processed fairly and lawfully in accordance with the current Data Protection Act and the General Data Protection Regulation. It will be:

- Adequate, relevant and not excessive
- Treated confidentially
- Used for the purpose(s) stated in this policy and not used for any other purpose
- Accessible only to Managers and Senior Officers after securing permission from Divisional Manager Customer Services, Divisional Manager Revenues and Benefits, Director of Residents Services or the Data Processing Officer to the Council.
- Stored securely

- Not kept for longer than necessary and securely destroyed once any issue(s) in question have been resolved

Advising customers that calls are being recorded/monitored

Before an officer takes a call in CCC or CST customers are greeted with a pre-recorded welcome message part of which advises the customer that their call will be recorded and why so they have the opportunity to consent by continuing the call or disconnecting.

A customer may request that their call is not recorded, in which case the customer is asked to make contact with the Council by email or in writing.

In exceptional circumstances a customer who requests their call is not recorded may be transferred to a non-recorded phone. This decision will only be agreed by a manager within Customer Services or Revenues and Benefits and where not doing so could cause unnecessary and undue distress to the customer or otherwise at the discretion of the Data Protection Officer to the Council.

In order to comply with Payment Card Industry Data Security Standards (PCI/DSS) calls where the customer provides details of a payment card for the purpose of making a payment are automatically stopped when the officer opens the income software payment page. The recording recommences when the payment page is closed.

Related policies

- Data Protection Policy
- Information security policy
- Safeguarding policy
- Disciplinary policy

Procedures for managing, releasing and deleting call recordings

- Call recordings are stored digitally, with access to the recordings controlled by the Divisional Manager Customer Services and the Data Protection Officer
- Access to call recordings is limited to Divisional Manager Customer Services, Lead Customer Services Officers and the Principle Client Support Officer
- Access to recorded calls is by secure unique log in.
- The system records when a recorded call has been accessed.
- Divisional Manager Customer Services records details of all call access requests
- Monitoring of calls may be undertaken by an officers direct line manager or service manager. This will be solely to assess individual performance to agreed call handling standards or in order to improve services
- Where recordings are used for quality management and control purposes officers will be provided with a small selection of calls scored against criteria for discussion with their manager
- Any play back of recordings will be in a private setting and officers will be given the opportunity to listen/see their own calls as part of training, coaching and performance development with their manager
- Browsing of recordings for no valid reason is not permitted

- Call recordings are deleted after 6 months unless it is subject to an ongoing criminal investigation or formal complaint. In this case the recording will be retained until the completion of the complaint or investigation procedure and the expiry of any appeals period and the investigating officer will inform the Data Protection Officer of this decision to retain past six months.
- Other than where held for a criminal investigation, call recordings are automatically deleted after 6 months. Where individual recordings have been saved to a separate area (training, coaching, investigation) it is the service managers responsibility to ensure the recording is deleted when necessary.

Subject Access Requests

Every individual has the right to access information we hold about them. This includes recorded telephone calls as recordings constitute the personal data of both the caller and the officer taking the call. They will therefore be managed in such a way that the rights of the data subjects (callers and officers) can be fulfilled and all obligations of the data controller (Chichester District Council) are observed as per the councils Data Protection Policy.

A person may request a copy of a telephone conversation via a Subject Access Request which must be notified in writing to the Data Protection Officer. If the recording has not been deleted in accordance with this policy, the recording may be provided to the requester.

Breach of policy

Any breach of this policy may result in action being taken under the Councils Disciplinary and Contract Termination policy. Breaches will also be reported to the Council's Data Protection Officer and subsequently the Information Commissioner.