

**POLICY & FINANCE COMMITTEE**  
**24 SEPTEMBER 2020**

**CALL RECORDING POLICY**

**1.0 Purpose of Report**

- 1.1 To present to Members a case for the introduction of call recording and seek approval for the Call Recording Policy, including the proposed duration of storage of a recording.

**2.0 Background Information**

- 2.1 There is currently no call recording functionality in the Council's telephony or call centre solutions. The telephony and call centre solutions are moving to a new provider (likely to be in October 2020) and this solution has call recording functionality.

**3.0 Proposal - Call Recording**

- 3.1 There are three purpose for Call Recording:
1. Quality management, meaning staff training and performance reviews to improve service delivery and provide the Council with assurance of the quality of service information given to customers and the quality of the customer experience.
  2. The investigation of complaints, meaning the call can be used as evidence in the resolution of complaints/ombudsman investigations or to clarify the content of a particular conversation.
  3. To investigate safeguarding concerns or violent, dangerous, abusive or illegal behaviour. A call recording can be evidence in assessing the seriousness of threats or to seek injunctions/exclusion of individuals from Council premises. They can also be used to provide evidence for criminal proceedings or investigate fraudulent activity.
- 3.2 This policy applies to incoming and outgoing calls from the Council's three call centres (Newark & Sherwood Customer Services, 'CAS' Housing Contact Centre and Careline). All calls will be recorded as standard and this includes incoming and outgoing calls.
- 3.3 Call recording can be 'turned on' by other alternative business units as required when interacting with the public. This may be used by services such as Revenues & Benefits or the enforcement and emergency planning functions within Public Protection where officers may interact with aggressive customers or require an audit trail of information given. Any business unit that requires this function will inform the Information Governance Officer and their request for call recording functionality will be reviewed and if approved they will be given access.
- 3.4 Call recording will not be turned on for directly dialled calls to individual Council extension numbers unless the call receiver is already approved to record calls and they wish to turn recording on (for one of the reasons highlighted in 3.1). This will only be done with the consent of the caller. Where payment card details are taken this is done in line with the Payment Card Industry Data Security Standards (PCI DSS). This means that card details will not be stored.

- 3.5 The policy in the **Appendix** outlines the full details. The purpose of this policy is to ensure that our call recording processes and procedures are compliant with the Data Protection Act (DPA) and General Data Protection Regulations (GDPR) legislation, including retention periods and the reasons for recording.
- 3.6 All callers will be informed that their call will be recorded, along with the reason why.
- 3.7 Call recordings would be treated in the same way as any other information held in relation to an individual, and must therefore be considered when responding to any Subject Access Request made to the Council. Call recordings may be requested by partner agencies such as the Police, in connection to the detection or prevention of crime, or ongoing investigations. These requests will be assigned to the Information Governance Officer who will submit the request and arrange for access to any recordings. All requests will be stored in line with Subject Access Request procedure.
- 3.8 This policy has been reviewed by GMB and UNITE.

#### **4.0 Proposal - Call Recording Retention**

4.1 All call recordings will be stored with the Council for up to 100 days. After 100 days the call will be deleted unless it is required in an open enquiry/ investigation or being used in quality management.

4.2 The proposed retention of call recordings is as follows:

0-40 days: Recording stored securely with telephony provider

After 40 days: Recordings deleted unless action is outstanding (e.g. the housing repair is still outstanding) or for reason in 3.1. The call recording will be moved to be stored on NSDC servers.

After 100 days the recording will be deleted unless it is required in an open enquiry/ investigation or being used in quality management or training.

4.3 If that is the case the recording will be stored on Newark and Sherwood District Council servers. Access to recordings is subject to user permissions. These will be kept in a secure place until any such process/ proceeding/investigation has come to an end. At this point, they will be deleted. Access to recordings will be controlled and managed by means of secure login.

#### **5.0 Equalities Implications**

5.1 A caller will have two opportunities to consent to call recording and if no consent is received they will be put through to an advisor without the call being recorded and they will be able to proceed with their query as normal.

## **6.0 Financial Implications (FIN20-21/669)**

- 6.1 The introduction of this functionality will be included in the new telephony software. There is a revenue cost per user per month for storage of calls for the first 40 days chargeable from the contract for the new system being signed. For full details of the costs of the contract, specifically the call retention charge, please see the 'Telephony and Call Centre Solution' exempt report to this Committee.
- 6.2 There is no charge for adhoc call recording by back-office users as these will be stored on NSDC servers or the storage of recordings after 40 days (as this will be done using Council servers).

## **7.0 Community Plan – Alignment to Objectives**

- 7.1 This policy aligns to the objective "generate more income, improve value for money and increase residents' satisfaction with the Council" and it aligns with the Council's obligations to the safety and security of their staff.

## **8.0 RECOMMENDATION**

**That the Call Recording Policy as set out in the Appendix to the report be approved.**

### **Reason for Recommendation**

**Call recording to be introduced for service management, and therefore assurance over the quality of the Council's customer service, as well as the safety and security of staff in the investigation of complaints, concerns and violent, dangerous, abusive or illegal behaviour.**

### **Background Papers**

Nil

For further information please contact Ella Brady on Ext. 5279, Jill Baker on Ext. 5810 or Dave Richardson on Ext. 5405.

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