

Document Name	Call Recording Policy for Newark and Sherwood District Council
Effective Date	25 September 2020
Date for Review	To be reviewed by Newark and Sherwood Customer Services, in consultation with key stakeholders and with the support of Information Governance, part of Legal Services every two years or in response to changes in relevant legislation and/or other Newark and Sherwood District Council policies, procedures and agreements.
Version Number	<i>DRAFT</i>
Approved by	Senior Leadership Team Policy & Finance Committee
Responsible Business Managers	Business Managers Customer Services and Housing Services

Call Recording Policy for Newark and Sherwood

1.0 Overview

This policy applies to incoming and outgoing calls from all of the Council's contact centres (automatic call recording) and some incoming and outgoing calls from telephony users (where recording is actively turned on). Call recording will not be turned on for directly dialled calls to individual Council extension numbers unless for the reasons outlined in 2.2 or 2.3. 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.

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.

2.0 The Purpose of Call Recording

2.1 All callers in scope of this policy will be informed that their call will be recorded, along with the reason why

2.2 Call recordings **may** be used for **Quality Management**

- Staff training and performance reviews
- To improve service delivery
- To assure the quality of service information and quality of the customer experience

GDPR Reason: Recording is in the legitimate interests of the recorder, unless those interests are overridden by the interests of the participants in the call.

2.3 Call recordings **may** be used for the **Investigation of Specific Complaints**

- To provide evidence in the resolution of complaints/ombudsman investigations
- To clarify the content of a particular conversation

GDPR Reason: Recording is in the legitimate interests of the recorder, unless those interests are overridden by the interests of the participants in the call.

GDPR Reason: Recording is in the public interest, or necessary for the exercise of official Authority.

2.4 Call recordings **may** be to **investigate safeguarding concerns or violent, dangerous, abusive or illegal behaviour**

- To provide evidence in assessing the seriousness of threats
- To provide evidence to seek injunctions/exclusion of individuals from Council premises
- To provide evidence for criminal proceedings
- To investigate fraudulent activity

GDPR Reason: Recording is necessary to protect the interests of one or more participants.

3.0 Scope

3.1 Automatically for calls made into/out of contact centres. The contact centres being:

- Newark and Sherwood Customer Services
- 'CAS' Housing Contact Centre
- Careline

3.2 Call recording can be turned on by additional users within specific business units as listed below, as required when interacting with the public:

- Revenues & Benefits
- Planning Development
- Financial Services
- Public Protection (enforcement and emergency planning)

Any business unit that requires this function will inform the Information Governance and Data Protection Officer and follow the procedure within this policy.

4.0 Customer Recording

All callers in scope of this policy will be informed that their call will be recorded, along with the reason why. Call recording occurs in three settings.

Setting 1: Call Centre – Incoming Call

Notification will be a standard feature on the pre-recorded welcome message, which is presented to the caller on connection to the telephone network. Those callers who object to the recording will be offered alternative means of accessing the Council, for example to email. Alternatively, call recording will be ‘switched off’ for the call.

Setting 2: Call Centre – Outgoing Call

Call centre users will read a set script to notify customers the call is being recorded and seeking confirmation of consent.

Setting 3: Telephony User – Incoming/Outgoing call

A limited number of named staff outside the contact centre will be given the ability to record a call (this will be controlled). These recordings are for the purposes outlined in 2.2 and 2.3. For example, a planning officer may wish to record a call where a customer is seeking to make a complaint to ensure a recording of this is on file for evidence as required. If call recording is switched on the officer must read the standard script and achieve consent.

5.0 Storage

All recordings will be stored securely for up to 100 days. After 100 days the recording will be deleted unless it is required in an open enquiry/ investigation (investigation of a specific complaint/ investigation of safeguarding issues or violent, dangerous, abusive or illegal behaviour) or being used in quality management or training.

Access to recordings is subject to user permissions. Recordings 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.

6.0 Access Requests from the Public

Call recordings are to 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 and Data Protection 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.

7.0 Policy Review

To be reviewed every two years or in response to changes in relevant legislation and/or other Newark and Sherwood District Council policies, procedures and agreements.