

Mid Devon District Council

Call Recording Policy

Policy Number: CF-01

Customer Services

May 2018

Version Control Sheet

Title: Call recording policy

Purpose: To provide an agreed policy for all staff, members and customers in relation to recording of calls to and from the council, and the management of access and use of telephone recordings.

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Status: DRAFT

Review Frequency: Every 2 years or sooner if required

Next review date: May 2020

Consultation This document was sent out for consultation to the following:

Group Managers Team

Leadership Team

Document History

This document obtained the following approvals.

Title	Date	Version Approved
Group Managers Team	29.08.2018	
Leadership Team	04.09.2018	

1. Introduction

This document outlines the Mid Devon District Council (MDDC) policy on recording of telephone calls within the call centre.

The purpose of call recording is to:

- Help identify staff training needs and support effective training;
- Improve the quality of service and customer care;
- Protect staff from aggressive, abusive or nuisance calls.

It is intended, where technically possible, to enable other services to implement call recording where there is a health and safety need identified. This policy will be reviewed with each service as call recording is implemented within the service area.

2. Scope

This policy applies to all Mid Devon District Council staff, Members and customers.

The Council telephone system has the capability to record all incoming and outgoing calls to and from the call centre and specified extension numbers.

Recording by the call centre will be done on demand, using the recording function within the phone system. It is not intended to record all calls in and out of the call centre.

Recording ceases when the call has been passed to an extension outside of the call centre unless the specific extension has call recording facility.

This meets the requirement of proportionality within the Data Protection Act.

3. Relevant legislation

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

- The Regulation of Investigatory Powers Act 2000;
- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- The Telecommunications (Data Protection and Privacy) Regulations 1999;
- The General Data Protection Regulation 2016;
- The Data Protection Bill 2018; and
- The Human Rights Act 1998

4. Use of recording facility

Call recording will be switched on by the advisor when:

- It is deemed likely there will be a complaint by the customer
- Persistent/nuisance caller
- Unacceptable caller behaviour
- Difficult call where a record of the information given may be needed
- Requested by Team Leader or Manager for training purposes

- To verify customers agreement during certain requests i.e. where a payment is required for chargeable repairs

Customers must be informed that recording is being switched on and that the contents of the recording may be reviewed.

5. Notification

All reasonable effort will be made to communicate that calls may be recorded. This will be done by:

- A pre-recorded message which will be played when a caller rings the Council's main extension number, prior to speaking to and advisor
- Information on the Council's website
- Callers being informed by an advisor when they are going to record a call

6. Payment card industry standards

To comply with Payment Card Industry Standards, call recording is not being switched on where payment card details are being provided any recording will be stopped and restarted when the payment has been completed.

7. Access and use of recordings

The recordings will be stored securely on the Councils servers and only authorised staff within Customer First will be able to listen to and export recordings, these individuals will be the Customer First Manager and Customer First Team Leaders. Other staff within the Council will not have this facility.

A small number of recordings per month (no more than 5 per advisor) will be used for training within teams, staff may be asked to listen to these recordings as part of training or one to one discussions with team leaders. Calls will not be played to colleagues without the permission of the advisor who took the call.

Staff can draw Team Leaders/Managers attention to a particular recording if they feel there is a need to do so.

Recordings will only be exported from the system for the purposes of dealing with internal and external complaints. Recordings will be accessed if one or more of the following applies to the need to review:

- Necessary for one or more of the purposes of this policy, or
- In fulfilment of a legal right of access (e.g. a subject access request), or
- Both necessary and proportionate with the terms of the exemption to the Data Protection Act non-disclosure provisions (e.g. crime prevention)
- Necessary in dealing with a capability or disciplinary matter

A record will be kept by Customer First Team Leaders of all recordings exported for the purposes of dealing with internal and external complaints, this will include who it has been shared with and the location it has been saved to.

It is a breach of this policy to provide recordings to others, or to use or listen to them, other than for the purposes set out in this policy. This is also a disciplinary offence and will be

dealt with under the appropriate provisions of the data protection policy and/or disciplinary policy and procedure.

8. Retention of recordings

Recordings will be kept securely for 1 month and will be deleted automatically after this time. However if there is a specific need to retain a specific recording for a longer period, as described in 7; this will be reviewed by the Customer First Manager and Team Leaders. Information will not be held for a longer period than is necessary.

Recordings exported and saved outside of the system must also be deleted when no longer required. This will be the responsibility of the individual Team Leader who saved the recordings.