



Call Recording Policy

1 Introduction

There are a number of systems used by service areas across the authority to record telephone conversations to and from specified telephone extensions.

The purpose of these system is to:

- Monitor the quality of call handling and customer service,
- Facilitate staff training,
- Verify what was said if there is a dispute or complaint,
- Protect staff from abusive behaviour,
- Verify customer agreements during certain service requests.

2 Legislation

The recording and monitoring of telephone calls is affected by a number of items of legislation, in particular:

- Article 8 of the Human Rights Act
- Data Protection Act 1998
- Regulation of Investigatory Powers Powers Act 2000
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBP Regulations)

The recording of employee's telephone calls has also been the subject of guidance from the Information Commissioner within the ICO's Employment Practices Code and Supplementary Guidance which has been incorporated into this policy.

If it is likely that conversations that include data relating to a customer's credit card, debit card or bank account details will be recorded, advice must be sought from IT Security to ensure compliance with Payment Card Industry Data Security Standard (PCI DSS).

Standards for the recording of telephone calls are also included in "The Telecare and Telehealth Integrated Code of Practice (Safeguarding Standards Module)" issued by the Telecare Services Association.

3 Implementing Call Recording

Before a service area commences call recording, a business case must be made to the Director of Corporate Services for permission to commence call recording. This must contain:

- a) A clear and valid reason for recording calls.
- b) Confirmation from the IT Security Manager that the service's call recording system and processes are compliant with PCI DSS and IT Security Standards.
- c) Confirmation from the Corporate Information Governance Manager that the service's call recording is compliant with corporate information governance policies and that a Privacy Impact Assessment (PIA) has been completed.
- d) Confirmation from the Head of HR and Organisation Development that the service's call recording is compliant with corporate HR policies and that staff have been properly consulted.
- e) Details of the levels of access that various staff groups or individual staff would have to recordings.

Only the corporate Call Recording System (as specified by the Head of IT Services) may be used to record telephone calls. Any requirement outside of this arrangement must be discussed with, and agreed by the Head of IT Services.

4 Staff issues

Where staff are using a telephone system that could allow their telephone conversations to be recorded the following actions must be taken:

- a) All reasonable efforts must be made to ensure that staff are aware that calls may be recorded. To achieve this staff using the system for the first time must be told that calls may be recorded and they should be reminded every 12 months.
- b) Staff in other service areas that frequently talk to staff using recorded extensions must be informed that calls to these extensions may be recorded.
- c) Staff must be made aware of why calls are being recorded, how the recordings may be used and the retention policy for those recordings.
- d) Extensions that are recorded should be marked to inform users of that fact.
- e) Where staff are using an extension that is constantly recorded they must have access to an extension that is not recorded to allow them to

make or receive confidential calls (e.g. to receive urgent family calls, to make calls to staff representatives or to have a confidential discussion with a line manager).

- f) Staff who are likely to use an extension that is recorded must be made reminded that only business calls may be made on that extension.

5 Customers

If it is likely that a call to or from a customer will be recorded then all reasonable efforts must be made to ensure that callers are aware of this fact. Whenever possible this will be achieved by ensuring that a notification of recording is given at the start of the call. If this is not operationally feasible the service area will make all reasonable efforts to ensure callers are aware of call recording in advance and that a record of these actions must be recorded.

When telephoning customers from a recorded extension they must be informed that the call is being recorded at the beginning of the call.

If a customer is abusive during a telephone call on a recorded extension they must be reminded that the call is being recorded and that its contents may be reviewed.

Where there is a need to verify a decision of the caller (e.g. that the information they have provided in support of an application is true and accurate) they must be reminded that the conversation is being recorded to verify their decision.

6 Use of recordings

Call recordings may only be used for the specified purposes, i.e:

- a) To monitor the quality of call handling and customer service,
- b) Staff training, coaching and support
- c) The verification of what was said if there is a dispute or complaint,
- d) To protect staff from abusive behaviour,
- e) To verify the customers agreement during certain service requests

Call recordings can be played back from the system for use within the Service Area for the agreed purposes by staff who have an operational need to do so. Call recording systems must have security features that control access to recordings, with only nominated staff able to download, copy, share or delete recordings.

Call recordings may be used outside of the Service Area by CCBC officers for an agreed purpose in order to deal with issues arising from the original call with the permission of one of the following:

- Manager of service area (nominated by Head of Service)
- Senior Information Risk Officer (SIRO)
- Internal Audit Manager
- Head of Service
- Head of Legal Services / Monitoring Officer
- Director of Corporate Services
- Chief Executive

Recordings released to other service areas must be kept securely and in compliance with this policy. Once the recording has been used for the agreed purpose it must be deleted. Advice on the use and retention of these recordings can be obtained from the Corporate Information Governance Unit.

If a service area wishes to use a recording for a purpose other than those identified in Section 6 (a) to 6(e), or for a purpose unrelated to the reason for the call, advice **must** be sought from the Corporate Information Governance Unit.

If a service area wishes to release the recording of a call to an external agency they **must** first contact the Corporate Information Governance Unit for advice. The recording may only be released with the permission of one of the following:

- SIRO
- Monitoring Officer
- Director of Corporate Services
- Chief Executive

Each time a recording is released to be used outside of the Service Area the following items must be recorded in a Release of Recording Log that will be maintained by Corporate Customer Services and held securely in the Contact Centre:

- The purpose for which it is being released,
- The person requesting the recording
- The date/time of the recording,
- Who has authorised the release

7 Retention of recordings

All recordings will be retained for 12 months.

All recordings will be deleted after 24 months, unless they have been retained for a specific purpose. Guidance must be obtained from the Information Governance Unit before retaining recordings longer than 24 months.

David Titley
Corporate Customer Services Manager
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