Call Recording Policy

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<th>Hambleton District Council</th>
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<tbody>
<tr>
<td>Title</td>
<td>Call Recording Policy</td>
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<td>1.0</td>
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<tr>
<td>Author</td>
<td>Helen Kemp, ICT Manager</td>
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<td>Review date</td>
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**REVISION HISTORY**

<table>
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<tr>
<th>Revision Date</th>
<th>Reviser</th>
<th>Previous Version</th>
<th>Description of Revision</th>
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<tbody>
<tr>
<td>October 2013</td>
<td>H Kemp</td>
<td>n/a</td>
<td>Original /Draft</td>
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<tr>
<td>December 2013</td>
<td>H Kemp</td>
<td>0.1</td>
<td>Amends from Management Team</td>
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PURPOSE

The purpose of this policy is to govern the procedures for call recording within Hambleton District Council and the management of access and use of telephone call recordings.

The implementation of recording of telephone calls was agreed in order to support effective training and delivery of excellent customer service, and to enable the council to deal efficiently with internal or external complaints.

SCOPE

The policy aims to minimise intrusion by restricting access to and use of recordings to limited and specified purposes only.

This policy outlines:
- Recorded information
- Purposes of call recording
- Access and availability
- Information Security (incl Data Protection and Notification)
- Monitoring and review

RECORDED INFORMATION

All calls received or made from nominated extensions will be recorded utilising the Council's Xarios call recording system and may be stored securely within the council's systems for up to thirteen months.

Telephone calls currently included in the call recording scope are in the following services:
- Customer Services
- Revenues and Benefits

Calls to and from other Officers within the council are not currently recorded but may be recorded in any future extension of the telephone recording system.

Calls where the caller provides details of a payment card for the purpose of making a payment to the council will only be recorded in part to comply with Payment Card Industry Security Standards (PCI-DSS).
PURPOSES OF CALL RECORDING

The purpose of call recording is to provide an exact record of the call which can:
- help protect Officers from abusive or nuisance calls;
- establish the facts in the event of a complaint either by a customer or a member of staff and so assist in resolving it;
- help identify Officer training needs and to support training new and existing Officers; and
- assist in the councils quality control to identify any issues in council processes, with a view to improving them.

In addition, recordings may provide evidence for crime prevention purposes.

INTERNAL ACCESS AND AVAILABILITY

Access and playback of recordings will be carefully controlled as per the requirements of the council’s data protection policy.

Only those with the appropriate authority can access calls. They are required to maintain a secure and private password, which is auditable and traceable within the software. The password chosen must meet minimum guidance for security as advised within the Council’s ICT Information Security Policy.

Access to calls may be for a number of reasons. We anticipate that the three main reasons will be for checking accuracy, answering complaints, and for training to improve service and skills. In addition, recordings may be accessed by the ICT Service teams for the purpose of maintaining the call recording system.

Recorded calls can also be used to support council tax administration as the call can provide the evidence to support changes to the council tax system.

Any individual officer may request to hear call recordings in which they are personally involved, and any Service Manager may request to hear call recordings which involve a member of their team. They should make a written request detailing the reason for hearing the recording to the:

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<tr>
<th>Service Area</th>
<th>Authorising Manager</th>
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<tr>
<td>Customer Services</td>
<td>Customer Services Manager</td>
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<tr>
<td>Benefits</td>
<td>Benefits Manager</td>
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<tr>
<td>Revenues</td>
<td>Revenues Manager</td>
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Or, in their absence, the request may be considered by the ICT Manager/Data Protection Officer.

Specific call recordings may be provided to Human Resources or the Disciplinary Hearing Panel for evidence in a disciplinary process.
Call Recording Policy V1.0

Members will not normally have access to listen to recorded calls unless the call relates to them, or they have the written authorisation of the requester.

INFORMATION SECURITY (INCL DATA PROTECTION AND NOTIFICATION)

Recordings constitute the personal data of both the caller and the operator. Therefore they will be managed in such a way that the rights of data subjects (callers and operators) can be fulfilled, and all the obligations of the data controller (Hambleton District Council) are observed, as per the council’s data protection policy.

Every caller is notified that the call is recorded and why before the conversation is opened. This will be done through either a pre-recorded message in the council’s telephone welcome message before connection is made to an Officer, or through an Officer script. All relevant council communications will also refer to a copy of this policy which is located on the council’s website.

A caller may request that their call is not recorded. In this situation the caller will normally be advised to contact the council either in writing or by email. In exceptional circumstances a caller who does not wish to be recorded will be transferred to a non-recorded phone. This decision will be made by a Manager, when he or she judges that not doing so could cause distress to the caller.

Recordings will normally be retained for thirteen months and then automatically deleted. Some recordings may be retained for longer than thirteen months for the following reasons, if:

- required for a complaint. In this case the recording will be retained until the completion of the complaint procedure and the expiry of any appeals period. If necessary the recording will be retained until the end of any employment tribunal proceedings.
- they have been identified by a member of the council’s management team as valuable for staff training. In this case the recording will be retained until it is no longer useful for this purpose.
- identified as evidence for the record-keeping requirements of the council’s procedure for dealing with unacceptable behaviour towards staff and unreasonably persistent complainants.

Customers / callers have the right to listen to or have copies of recordings made of their own calls, requests for access need to be made via the Council’s Subject Access Request (SAR) procedures. These recordings will be located by reference to the date and time of the call and the operator’s identity. Callers asking for the recordings of their calls will have to provide the reason for the request and enough information about date, time and operator to enable them to be found.
All reasonable attempts will be made to confirm that the identity of the individual making the subject access request matches the identity of the caller. If in doubt the final decision will be made by council’s data protection officer. The data protection officer will also balance the privacy of the caller or HDC Officer with the rights of the individual making a subject access request when coming to a decision.

A permanent copy of the recording will be provided in a format the council can reasonably expect the enquirer will be able to use taking account of the individual’s preference (if any) and practicality and cost of preparation. Formats could include WAV, MP3 or other digital format, or a transcript.