

# Customer service centre Call recording policy

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## **Summary**

This document outlines the North Yorkshire County Council (NYCC) policy on recording telephone calls at the customer service centre (CSC).

The policy outlines:

- recorded information;
- purposes of call recording;
- selection of call recordings;
- data protection;
- access controls; and
- staff protection.

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

## **Recorded Information**

The CSC is the only location in NYCC where calls are routinely recorded.

All telephone calls to and from the CSC advisors' phones are electronically recorded.

These include:

- calls made to a CSC advisor;
- calls made by a CSC advisor;
- calls between CSC advisors;
- external calls (i.e. those between a CSC advisor and callers who are not using an NYCC Titan VOIP phone);
- internal calls (i.e. those between a CSC advisor and callers using an NYCC Titan VOIP phone);
- switchboard transfers (i.e. when a caller is transferred by a CSC advisor. The duration of the call between the CSC advisor and the NYCC colleague is recorded but as soon as the call is transferred to the colleagues the call recording terminates).

Calls to and from other NYCC staff are not recorded.

Recording stops when:

- the CSC advisor finishes the call; or
- the call is transferred to a non-CSC advisor extension (i.e. when a CSC advisor is no longer part of the call)

Every call record includes the following components:

- the information provided or other words spoken by the caller;
- date, time and duration of the call;
- the receiving workstation;

- the telephone number that the customer is using (unless withheld);
- the words spoken by the CSC advisor, and (by deduction from workstation ID) his or her identity;
- the screen information that the CSC advisor sees, accesses and enters into their PC.

### **Purposes of call recording**

The purpose of call recording is to provide an exact record of the call which can:

- help identify CSC staff training needs;
- help improve CSC staff performance;
- help protect CSC staff 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;
- assist in CSC quality control to identify any issues in CSC processes, with a view to improving them; and
- demonstrate that calls are accurately and efficiently transcribed onto the customer relationship management system (CRM) or to other databases.

In addition recordings may provide evidence for crime prevention purposes.

### **Selection of call recordings**

Recordings are selected for review through random sampling based on pre-defined criteria.

CSC advisors can draw a particular recording to a team leader's attention if they feel it is useful for training, or is valuable for evidence purposes in the event of a caller complaint/persistent caller/unacceptable caller behaviour.

Occasionally team leaders will listen to a sample of call recordings to ensure that they are all reviewing recordings to the same standard.

### **Data protection**

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 (NYCC) are observed, as per NYCC's data protection policy.

Every caller is informed that the call is recorded and why before the conversation is opened. This will be done through either a pre-recorded message in the NYCC telephone welcome message before connection is made to a CSC advisor, or through a CSC advisor's script.

A caller may request that their call is not recorded. In this situation the caller will normally be advised to contact NYCC 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 member of the CSC management team, when he or she judges that not doing so could cause distress to the caller.

Recordings will normally be retained for three months and then automatically deleted.

Some recordings may be retained for longer than three 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.
- Because they have been identified by a member of the CSC management team as valuable for staff training. In this case the recording will be retained until it is no longer useful for this purpose.
- If identified as evidence for the record-keeping requirements of NYCC's procedure for dealing with unacceptable behaviour towards staff and unreasonably persistent complainants.

Separate, unrecorded lines are available for private calls by staff. Such calls will still be subject to the telephone usage policy.

A caller or a member of staff can make a subject access request for a recording. 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 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 NYCC's data protection officer. The data protection officer will also balance the privacy of the caller or member of staff 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 NYCC 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.

### **Access controls**

As per the requirements of NYCC's data protection policy, recordings will be accessible on the basis of need.

Need is in relation to the purpose to which the recording will be put (see the list in this policy under 'purposes of call recording').

Access (whether direct or by means of a copy) is controlled by the CSC manager (or an individual designated as having such powers by the CSC manager) who will grant it only if he or she is satisfied that it is:

- necessary for one or more of the purposes in this policy, or
- in fulfilment of a legal right of access (e.g. a subject access request), or
- both necessary and proportionate within the terms of an exemption to the Data Protection Act non-disclosure provisions (e.g. crime prevention).

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. It 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.

### **Staff protection**

There is a risk that CSC advisors receive calls from persistent complainants, or receive calls which contain unacceptable behaviour. A recording may be used as evidence in this situation, or if legal action is appropriate, as per NYCC's procedure for dealing with unacceptable behaviour towards staff and unreasonably persistent complainants

A recording may also be used as evidence in the event that a CSC advisor receives abuse or otherwise unacceptable behaviour from an NYCC colleague. In this situation the recording will be made available to the colleague's line manager, to be investigated as per NYCC's disciplinary policy and procedure.

The decision as to whether a recording will be used as evidence in the situations outlined above will be made by the CSC manager (or an individual designated as having such powers by the CSC manager).