

ABERDEEN CITY COUNCIL

COMMITTEE	Staff Governance Committee
DATE	31 January 2019
REPORT TITLE	Policy on Use of Call Recording
REPORT NUMBER	CUS/19/104
DIRECTOR	Andy MacDonald
CHIEF OFFICER	Jacqui McKenzie
REPORT AUTHOR	Alexander Ryland
TERMS OF REFERENCE	4.1, 5.3

1. PURPOSE OF REPORT

To review the Policy on Use of Call Recording which provides the framework for recording and monitoring of customer calls in the Customer Contact Centre.

2. RECOMMENDATION

That the Committee:

- 2.1 Approves the revised policy and instructs the Chief Officer – Customer Experience to implement outlined changes.

3. BACKGROUND

- 3.1 Calls at the Customer Contact Centre are recorded and monitored for the purposes of quality assurance and health and safety. This has been in use since shortly after the Contact Centre was established in 2008 with a policy in place to govern the way recordings are made, stored and used. This policy was developed in consultation with trade union colleagues.
- 3.2 The original business case for recording calls was made based on concerns related to health and safety of employees due to abusive or threatening behaviour by customers. This was supplemented by the need for an effective way of managing disputes and complaints with customers. Calls for Community Alarms are recorded as a mandatory part of that service due to the nature of calls received (e.g. people in life threatening situations).
- 3.3 A report was agreed at Resources Management Committee on 3 June 2008 noting that a policy had been prepared and implemented as part of wider approval sought for purchasing a call recording solution.

- 3.4 This policy recently required a review to be compliant with GDPR and ensure best practice. It includes updates to the following sections:

Section	Changes
2.1 How we use recordings of calls	Included reference to incident reports and time to recover from an incident. Updated wording around performance management framework.
2.2 Who has access to recordings	Simplified wording around who has access to recordings and why. Added ability to play recordings to other services for purpose of quality control.
3.2 How recordings are stored	Remove references to DVD storage.
3.4 Data protection and freedom of information	Updated references to GDPR and included legal basis for processing personal data.
4.1 How we inform our staff	Include section explaining that employees should be informed of the policy regularly.
4.3 Review of the policy	Included reference to Staff Governance Committee and new Chief Officer title. Changed review cycle from 18 months to three years.
4.4 Links to other corporate policies	References to other policies which should be read in conjunction with this policy.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no financial implications arising from this report.

5. LEGAL IMPLICATIONS

- 5.1 The introduction of the General Data Protection Regulation [GDPR] and the Data Protection Act 2018 has had implications for call recording. A privacy notice has been published on the Council's website and a review undertaken of the way in which data is managed. Customers are informed that calls are recorded at the start of their call allowing them the opportunity to end the call and contact the Council using a different method if they are unhappy with the recording of the call. Staff are informed about call recording as part of their induction.
- 5.2 This policy has had input from the Data Protection Officer and is consistent with the Council's responsibilities for data protection.
- 5.3 For the provision of Community Alarms in the Regional Communications Centre, it is a contractual requirement that calls are recorded. Aberdeen City Council provides this service on behalf several other Scottish local authorities.

6. MANAGEMENT OF RISK

	Risk	Low (L), Medium (M), High (H)	Mitigation
Legal	Non-compliance with GDPR and Data Protection Act 2018 in management, storage and/or use of recorded calls could result in enforcement action and/or reputational risk to the Council.	L	Legal advice has confirmed that the policy is consistent with obligations under GDPR.
Employee	Wellbeing issues arising from calls are not appropriately addressed	L	Quality assurance will highlight these issues which must be noted as part of the call review. Team Leaders are responsible for taking action in line with their duty of care toward employees.
Employee	Performance management issues arising from calls are not appropriately addressed	L	The performance management framework used as part of quality assurance will enable such issues to be properly addressed in an appropriate way between employees and line managers consistent with HR policy.
Customer	Customer complaints are not followed up properly or logged as required	L	This policy will be followed in line with the complaints procedure. Calls are quality assured by management.

7. OUTCOMES

Design Principles of Target Operating Model	
	Impact of Report
Customer Service Design	Supports a data-led approach to improving service delivery through quality assurance.

Organisational Design	Ensures accountability for delivering a consistent customer journey in the Customer Contact Centre regardless of the service provided.
Governance	Supports better management of performance, and has central focus on the health, safety and wellbeing of employees. A main purpose of call recording is to ensure wellbeing is positively managed.
Workforce	Provides further tools to empower managers to properly oversee the performance of the service, support employees in their roles, and take ownership of wellbeing issues.

8. IMPACT ASSESSMENTS

Assessment	Outcome
Equality & Human Rights Impact Assessment	Required
Privacy Impact Assessment	Required
Duty of Due Regard / Fairer Scotland Duty	Not applicable

9. BACKGROUND PAPERS

N/A

10. APPENDICES

Policy on Use of Voice Recording v6.1

11. REPORT AUTHOR CONTACT DETAILS

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