

POLICY FOR USE OF VOICE RECORDING

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Revision history

Version	Date	Author	Summary of Changes
1.0	01/04/08	Lone Pedersen, Project Executive	Document issued
2.0	22/08/11	Silla Haili, Project Executive	Changes to reflect move to Frederick Street, changes to relevant job titles, supporting staff in receipt of abusive calls section.
3.0	18/07/12	Lucy McKenzie, Project Executive	Changes to reflect the process for access to calls and update of the Performance Development and Evaluation Framework.
4.0	04/06/15	Lucy McKenzie, Project Executive	Changes to reflect the minor change in process for Services requiring access to calls and changes to reflect the revised archive process due to change of supplier.
5.0	01/03/17	Lucy McKenzie, Project Executive	General review of policy.
6.0	01/08/18	Alexander Ryland, Customer Experience Officer	Update for GDPR and removal of DVD storage. Added how we inform staff and ordered into numbered sections.
6.1	23/11/18	Alexander Ryland, Customer Experience Officer	Updates from service comments

1 Background

1.1 This policy is in place to ensure the effective and appropriate use of voice recording in the Customer Contact Centre. Its purpose is to provide transparency for staff on how voice recording is used and managed.

1.2 The main reasons for using voice recording are:

- To assist in the clarification of accusations and to aid the resolution of disputes and complaints;
- To provide support to staff affected by abusive calls;
- To appropriately deal with irate, abusive and/or threatening behaviour;
- To provide quality assurance; and
- To identify and aid the training and development of staff.

2 Recording calls and usage

2.1 How we use recordings of calls

2.1.1 To assist in the clarification of accusations and to aid the resolution of disputes and complaints.

Recorded calls can be used to clarify the content of a call when investigating details of an accusation, complaint and/or dispute, and thereby help their resolution. Recorded calls are only used for this purpose when an issue has been raised by either a customer or a member of staff. Recorded calls can form part of a disciplinary proceeding if necessary.

2.1.2 To provide support to staff affected by abusive calls

Recorded calls can be used by Team Leaders to support a member of staff who has been affected by an abusive call in line with Aberdeen City Council's Health and Safety Policy. Members of staff who have been affected by an abusive call will be given time to recover and will be asked to complete an Incident Report form to formally record the incident. If appropriate, the call will be listened to by the Team Leader and the relevant member of staff to support the member of staff in overcoming the distress caused and to help them develop tools to overcome the effects an abusive call can have.

2.1.3 To appropriately deal with irate, abusive and/or threatening behaviour

Recorded calls may be used to investigate the details, nature and extent of irate, abusive and/or threatening behaviour. Recorded calls are only used for this purpose when an issue has been raised by either a customer or a member of staff. Where it is found that a customer or a member of staff has behaved in an unacceptable manner, the contents of the call will help to ensure that appropriate action is taken in proportion to the severity of the incident. This may include Police involvement and recorded calls can be used as part of a Police investigation. In relation to members of staff, calls can also be used as evidence in a disciplinary process.

2.1.4 To provide quality assurance

- a) A call quality monitoring framework has been developed in conjunction with Team Leaders, the Customer Service Operations Manager and the local trade union representatives to ensure that services are delivered consistently to our customers. The framework has been designed in such a way that it aligns with and links directly to the corporate Performance Review & Development scheme. The framework ensures that a fair, robust and consistent process is applied and that all members of staff are treated equally.
- b) For the purpose of quality assurance, recorded calls are subject to regular sampling by the relevant Team Leader and/or the Customer Service Operations Manager. This helps to ensure a consistently high quality of call handling and service delivery. Calls for this purpose are automatically and randomly selected by the system according to specific criteria and are not manually selected by a Team Leader or the Customer Service Operations Manager.
- c) When developing the framework, particular attention has been paid to creating a balanced approach to quality assurance, whereby quality of call handling is sufficiently assessed, but which is not excessive. Through the framework, standards have been set for call handling, which every member of staff would be expected to meet consistently. Should a member of staff fail to perform to any of these standards regularly, it will be identified as a development need and appropriate training will be given as a result of this. This will be provided in accordance with Aberdeen City Council's Managing Performance policy.

2.1.5 To identify and aid the training and development of staff

- a) Recorded calls are used for training and development purposes. This is carried out by the relevant Team Leader. Calls used for this purpose will be listened to by the Team Leader and the relevant member of staff. In order to develop best practice, calls taken by another member of staff, other than the staff receiving training, can be used for training purposes, subject to agreement with the member of staff whose call(s) is/are being used. In this case, the name of

the member of staff handling the call being used for training is not heard, and only calls demonstrating a good example are used.

- b) Please note that the call quality monitoring framework as described above has also been developed for training and development purposes. The framework allows staff to have complete clarity as to how well they are doing at any time as well as to support staff through their ongoing development.

2.2 Who has access to recordings

- 2.2.1 Recorded calls are for use within the Customer Contact Centre only. Access to recorded calls is based on individual user permission set up in the system, and access is only granted to Team Leaders and Customer Service Operations management or their equivalent.
- 2.2.2 Access to and/or copies of recorded calls will not be routinely made available to any other Services and any concerns or complaints are dealt with internally in the Customer Contact Centre. If a complaint relates to service delivery outside the remit of the contact centre, the relevant service will be advised accordingly. If the service needs to hear the call to resolve a complaint, recordings may be listened to by a senior manager of the service. Requests for access will be made to the relevant Team Leader or the Customer Service Operations manager and include the name of the member of staff who needs to hear the call.
- 2.2.3 Recordings may also be listened to for call quality monitoring purposes by a senior manager of the service which the Customer Contact Centre handles calls for. Requests for access will be made to the relevant Team Leader or the Customer Service Operations manager. A random sample will be provided and must be listened to under the supervision of the relevant Team Leader or the Customer Service Operations Manager.
- 2.2.4 The Customer Contact Centre Team Leaders and the Customer Service Operations Manager will receive training on the processes and procedures relating to voice recording. As part of this, they will be informed of the situations when the contents of a call can be shared with another Service and the control mechanisms governing this process.

2.3 How recordings are listened to

- 2.3.1 Recorded calls are listened to in a private setting. Any member of staff can at any time request to listen to their own recorded calls. Following this, the relevant Team Leader and the member of staff will agree a suitable time for the call(s) to be played back. Any such request for listening to calls must be reasonable in terms of the number of calls to be listened to and the time spent on this activity.

3 Management of recorded call data

3.1 How calls are recorded

- 3.1.1 The Customer Contact Centre uses extension side recording. This means that all incoming and outgoing calls to and from the extensions in the Customer Contact Centre are recorded. This includes both internal and external calls made to and from the Customer Contact Centre. A call answered at another location is not recorded until such time that it is transferred to the Customer Contact Centre. We do not record payment information from in order to be PCI-DSS compliant

(It is important to note that the above is based on the specific system characteristics of the supplier).

3.2 How recordings are stored

- 3.2.1 Recorded calls are kept for 6 months, after which point they are deleted. If there is a requirement to keep a specific call after this period, e.g. it may form part of an ongoing case with a customer, the call is kept until such time that it is no longer deemed necessary. Given the different nature of cases, the time a specific call is kept beyond the 6 month period may vary from case to case. Calls kept beyond this period will be reviewed on a regular basis to ensure that no calls are kept after they no longer serve a business purpose.
- 3.2.2 If a member of staff leaves their post, their calls are kept and used for the time period specified above as a call constitutes a business relationship/transaction between the customer and the Council.
- 3.2.3 Recorded calls are stored live through the database server for the 6 month period for which they are kept. All calls in the database are encrypted and can only be accessed with the specific software and appropriate access permissions. The system is set up in such a way that after the 6 month period, calls are automatically deleted from the database and it is no longer possible to retrieve them. However, if there is a justified business requirement to keep a call after the 6 month period, the specific call is tagged in the system and downloaded to a secure area of the council network. The downloading of calls is restricted to the voice recording system administrators.

(It is important to note that the above is based on the specific system characteristics of the supplier).

3.3 How we inform customers

- 3.3.1 All customers, internal and external, making a call to or receiving a call from the Customer Contact Centre, will be notified that their call may be recorded and for what purposes the call

may be used. Customers will also be made aware that all recorded calls will be dealt with in line with the law and Aberdeen City Council's data protection policy. This is done through a message played to the customer when they call the Customer Contact Centre and in a Privacy Notice which is available on the Council website at <https://www.aberdeencity.gov.uk/your-data>.

3.4 Data Protection and Freedom of Information

- 3.4.1 Under Article 15 of the General Data Protection Regulation, customers can request to have access to or obtain a copy of their own call. If such a request is received, the relevant Team Leader or Customer Service Operations Manager or equivalent must be notified, and the Corporate Information Policy and related procedures in relation to subject access requests shall be adhered to.
- 3.4.2 If a customer requests a copy of their own call, the request must be in writing and proof of identity must be provided before the call can be released. The Contact Centre will then respond to the request as quickly as possible, but in any event within 30 days. If the customer is unable to come into the office to listen to the recorded call, the call will be downloaded from the system and a recording or transcription emailed to the customer's private email address as appropriate. All personal information will be muted from the file prior to issue, e.g. names, addresses and account numbers. The member of staff who took the call cannot object to their part of the call being released under such a request unless there are health and/or safety risks associated with the release of the call.
- 3.4.3 Any other request for a recorded call (other than a customer's own call, which would be processed in accordance with the General Data Protection Regulation and the Data Protection Act 2018, as outlined above) would be dealt with under the provisions of the Freedom of Information (Scotland) Act 2002 and Aberdeen City Council's Corporate Information Policy and related procedures in relation to the same.
- 3.4.4 Aberdeen City Council is the Data Controller for this information. Wherever the Council processes personal data, we need to make sure we have a legal basis for doing so in data protection law. The Council understands our legal basis for processing personal data in relation to call recording as 6(1)(e) of the General Data Protection Regulation. This is because monitoring and improving the access we provide to Council services through our Customer Contact Centre is part of our public task. For employees the legal basis is the employee contract.

4 Implementing and reviewing this policy

4.1 How we inform our staff

4.1.1 Staff are informed about this policy as part of their induction when they start working for Customer Experience. Recordings are discussed with staff as part of quality assurance measures and regular discussions in one-to-ones.

4.2 Making a private call

4.2.1 It is recognised that staff have a right to privacy and may have a need to make a private call. An extension located on site, but which does not form part of the Customer Contact Centre and is not subject to recording, is available to staff for making private calls. Staff will not be charged for making private calls. The phones in the Customer Contact Centre are for customers contacting the Council, so if a private call is made to or from a phone in the Customer Contact Centre it will be recorded. Staff will be made aware of this fact.

4.3 Review of the policy

4.3.1 The Chief Officer – Customer Experience will review this policy every three years in co-operation with local trade union representatives. It will, however, be subject to continual review and amendment in the light of experience of its operation and best practice. Changes will only be put into effect following consultation with impacted staff and local trade union representatives, and approval by the Staff Governance Committee.

4.4 Links to other corporate policies

4.4.1 This policy should be read in conjunction with other corporate policies on Health & Safety including:

- Violence & Abuse Towards Employees Policy
- Managing Bullying & Harassment Policy
- Performance Management Policy
- Managing Discipline Policy
- Unacceptable Actions Policy