

Corporate Contact Centre

1 April 2019

How we use your personal information for Contact Centre Call Recording purposes

The Council provides services for local communities and the people who live in them. Undertaking this work means that we must collect and use information about the people we provide services to and keep a record of those services. Because we collect and use personal information about individuals we must make sure that they know what we intend to do with their information and who it may be shared with.

We have summarised in this privacy notice some of the key ways in which we use your personal information for Contact Centre Call Recording purposes.

Who we are, what we do.

The Contact Centre is the main telephone response service for the Council. It includes most incoming and outgoing telephone calls that are handled by the Contact Centre for Council Tax, Benefits, Environmental Services, Adult Social Care etc. All calls to the Contact Centre are recorded in their entirety, with the exception of calls where payments are made (call recording is automatically terminated whilst payment details are taken)

What and whose personal information we hold

Where customers choose to interact with the Contact Centre their personal data may be shared with the relevant service area/and wider organisations if necessary in order for them to process the customer's request. Excluding Payment card details, all dialogue and information provided by the customer to the Contact Centre officer (and vice versa) during a telephone call with the Contact Centre, is captured and held in the call recording.

The type of information that recordings will hold will vary by call but typically includes:

- Contact detail such as name, address, telephone number, property and email addresses.
- Identifying details, including date of birth and national insurance number.
- Financial information, including employment, income, bank account details.
- Family information including ages, dependents, marital status.
- Information about the subject matters health and medical details.

Where does the service get my information?

The source(s) of personal information provided during a call to/from Contact Centre may include:

- Information provided directly by the subject matter
- Information provided by another member of the public (e.g. complaint or concern)
- Information provided by an elected Councillor on behalf of their constituent.
- Information provided by other Council officers/services that liaise with the Contact Centre in the interests of its customers, or the Council itself
- Information provided by other organisations (e.g. Emergency Services, Landlords) regarding an individual.

What we will do with your personal information?

It has become common practice to record calls due to the growth of business conducted by telephone. Recording customer conversations allows the Council to assess customer satisfaction, train and develop staff, review call quality, and have access to a verbal record of what is said in the event of a subsequent complaint. It also means employees feel more protected knowing that any threatening behavior can be evidenced and acted upon where necessary.

Information held within a call recording can be used in the following ways:

- **Quality and Training Purposes:** Written records only provide partial information. A call recording provides a more rounded view and allows us to better understand customer experience and assess the processes applied. This can help us identify any improvement areas and ensure the quality of service provided by Contact Centre staff, by using the information within the recording to inform training subjects and individual employee development plans.
- **Gaining a better understanding of our customers** – Many calls are verbally resolved without the need to complete any records. Listening to sample calls will help us better understand our customer needs, and gain a more informed view of organisations we signpost to.
- **Complaints and Disputes:** Some calls are verbally resolved. Where information is entered onto an electronic system this becomes the established record. In the event of a complaint or dispute, a call recording (if available), may provide additional information to help us investigate any allegations, to protect the interests of the subject matter and/or the Council by using the information within the recording to respond to complaints regarding the Contact Centre and/or other Council services.
- **Legal Claims:** For use in the defence of legal claims against the Council, e.g. Highway claims.
- **Employee Safety and Wellbeing:** A recording may become a vital piece of evidence in the event of any threats being made to the Council or an individual.

What is the legal basis for the use of this information?

The recording of calls protects the interest of the subject matter and the Council in meeting:-

- **Legal Obligations** – using the information to comply with a common law or statutory obligation
- **Public Tasks** – to exercise ‘official authority’ and powers that are set out in law; or to perform a specific task in the public interest that is set out in law.

Examples for both of the above may include e.g. administer Council Tax, award correct Benefits, advise on various entitlements requests e.g. Social Care ensure Highway defects are managed, fly tipping addressed, waste collected, noise nuisance reported etc. and the defect of legal claims against the Council.

Does the service share my personal information with any other organisation?

Whilst information gathered during a call may be shared with other Council services or external organisations to assist in the resolution of the subject matters enquiry, call recordings are confidential and will only be shared with the following, where reasons for sharing is justified:

- Other Council services who work with the Contact Centre, with the intention to assist in resolving a dispute or complaint.
- The Police, to assist in the resolution of a criminal matter.
- Other organisations involved in the care of the subject matter (i.e. Social Services/Health care professionals etc)

How long will my information be kept?

- Call recordings held by the Contact Centre are retained for up to 18 months. Once this period of retention has expired, recordings will be deleted and no longer retrievable.
- Customer records can be held on the Customer Relationship Management system (CRM) for up to 6 years.