

POLICY

Call Recording



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1. Scope & Purpose

- 1.1. Lothian has a telephone system capable of recording conversations. Like many other organisations, this is a standard practice that allows the recording of telephone calls for quality monitoring, training, and compliance purposes.
- 1.2. All calls received into Customer Services, Park and Ride facilities and Insurance teams will be recorded and will be retained as per our Data Protection Policy. These recordings will only be used for the purposes specified in this policy.
- 1.3. The call recording facility is automated and accommodates incoming calls received from outside the organisation and external calls being made by a member of staff. If calls are transferred to a team that does not have call recording on their lines, the call recording will cease to act once the call is successfully transferred, but will continue if it is transferred to any of the teams identified above.

2. Purpose of this Call Recording Policy

- 2.1. In order to maintain high standards and protect the public and staff we need to record all telephone calls received into Customer Services, Park and Ride facilities and Insurance teams and retain them for a limited period of time.
- 2.2. We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant legislation. This includes:
 - The Data Protection Act 2018;
 - The General Data Protection Regulation (GDPR);
 - The Human Rights Act 1998;
 - The Regulation of Investigatory Powers Act 2000;
 - The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
 - Privacy and Electronic Communications Regulations 2003

3. Scope of Policy

3.1. Under normal circumstances a call will not be retrieved or monitored unless:

- It is necessary to investigate a complaint;
- It is part of a management 'spot check' that our standards are being met;
- Provides assurance of the organisations quality standards and policies
- There is a threat to the health and safety of staff or visitors or for the prevention or detection of crime;
- It is necessary to check compliance with regulatory procedures; or
- It will aid standards in call handling through use in training and coaching our staff.

4. Collecting Information

4.1. Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with the current Data Protection Act and the General Data Protection Regulation. It will be:

- Adequate, relevant and not excessive
- Used for the purpose(s) stated in this policy only and not used for any other purposes;
- Accessible only to managerial staff;
- Treated confidentially;
- Stored securely; and
- Not kept for longer than necessary and will be securely destroyed once the issue(s) in question have been resolved.

5. Advising Callers that calls are being Monitored/Recorded

- 5.1. Where call recording facilities are being used we will inform the caller that their call is being monitored/recorded for quality / training purposes so that they have the opportunity to consent by continuing with the call or hanging up.
- 5.2. There is a recorded message in place to inform callers that their call is being recorded.
- 5.3. We will publish our policy on our website.

6. Related Policies

- Data Protection Policy
- Customer Privacy Policy

7. Procedures for Managing and Releasing Call Recordings

- 7.1. The recordings shall be stored securely, with access to the recordings controlled and managed by the IT Department.
- 7.2. Access to call recordings will be given to Managers, Heads of Service and Directors of those teams, as they will be assessing call quality etc.

8. Version Control

Version No.	Date of Change	Change made by:	Key Amendments
V1.0	14/11/2018	N Connor	Published

