



**Corporate Policy &
Resources Committee**

**Thursday, 25 September
2025**

**Subject: Recommendation from JSCC: Telephone Call and Screen
Recording Policy**

Report by:

Director of Change Management, ICT &
Regulatory Services

Contact Officer:

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Customer Strategy and Services Manager

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Purpose / Summary:

To provide an update on the existing policy
following the implementation of screen recording
and changes in legislation

RECOMMENDATION(S):

- a) That the Corporate Policy and Resources Committee accept the recommendation from JSCC and the updated Telephone Call and Screen Recording Policy and appendices within this report be **approved**, to provide the right guidance to employees and customers regarding this matter.
- b) That any future minor housekeeping amendments be delegated to the Director of Change, ICT and Regulatory Services in consultation with the Chairs of the Joint Staff Consultative and Corporate Policy and Resources Committees.

IMPLICATIONS

Legal: The internal procedure and external policy ensures we comply with all legal requirements regarding call and screen recording and any relevant Data Protection and Payment Card Industry (PCI) compliance matters as detailed below:

- The Regulation of Investigatory Powers Act 2000
- The Telecommunications (Lawful Business Practice) (Inception of Communications Regulations) 2000
- The Telecommunications (Data Protection and Privacy) Regulations 1999
- Payment Card Industry Data Security Standards (PCI DSS)
- UK General Data Protection Regulation
- Data Protection Act
- The Human Rights Act 1998

•N.B.) Where there are legal implications, the report **MUST** be seen by the MO

Financial : FIN/58/26/CPR/SL

There are no financial implications arising from this report.

(N.B.) All committee reports **MUST** have a Fin Ref

Staffing :

(N.B.) Not required as no change to establishment because of this report

Equality and Diversity including Human Rights : Telephone call and screen recording will ensure that customers and officers operating within the Genesys CX Platform are treated fairly as these recording will provide evidence of any inappropriate behaviour or mishandling of customer data.

Data Protection Implications: Data Protection implications have been considered in conjunction with the Data Protection Officer. A Data Protection Impact Assessment (DPIA) has been produced for the Genesys CX Platform which will continue to be reviewed annually as a minimum.

We have identified legitimate legal bases for processing personal data for the purpose of screen and telephone call recording. Retention periods have been defined.

Privacy notices have been updated so customers are provided with the privacy information required by GDPR and are directed to this via a recorded message whenever making a call to our Genesys CX Platform.

Users of the Genesys CX Platform have had specific training on recognising and reporting data protection breaches.

We are aware we may record sensitive personal data, and this must be treated with due care, as it presents more risk than general personal data. Officers are aware that recordings, they feature in, could be requested by the customer as part of a subject access request, although due to sensitive information about our IT systems, screen recording will not be released to Customers.

ICT have confirmed relevant technical security is in place and only relevant officers are provided with access to the Genesys CX telephone call and screen recording system.

Telephone Call recordings are set to auto delete at 6 months and screen recordings at 3 months. To prevent auto delete a request must be submitted (see appendix 2)

A process for accessing Telephone call and screen recordings is at Appendix 2.

Climate Related Risks and Opportunities: None

Section 17 Crime and Disorder Considerations: None

Health Implications: None

Title and Location of any Background Papers used in the preparation of this report:

<https://itshared.sharepoint.com/sites/Minerva/SitePages/Unacceptable-Customer-Behaviour-policy-upd>

<https://democracy.west-lindsey.gov.uk/mgAi.aspx?ID=23528>

<https://www.west-lindsey.gov.uk/council-democracy/have-your-say/customer-experience/customer-experience-strategy-may-2024>

Risk Assessment :

There are risks associated with recording of customer contact, risks are managed, and the benefits of recording customer contact outweigh those potential risks.

A customer can request to see the information the Council holds about them via a Subject Access request (SAR), excluding screen recording. (See Data Protection Implications above)

The benefits of recording customer contact enables the council to;

1. Protect Customers against staff misuse/mishandling their data
2. Use the recordings as part of a formal complaint, data breach investigation, staff retraining or disciplinary (in cases of misconduct).
3. Continued coaching and development, using recordings as a means of enhancing the skills of our staff.
4. Undertaking performance management reviews as part of ongoing staff coaching and development in line with our Customer Experience Strategy.
6. The monitoring of our systems to improve the customers experience in line with our Customer Experience Strategy
7. Capturing error messages during system outages and issues
8. Transition to new software changes and future phases of the delivery of the Genesys CX Contact Centre
9. Checking compliance with our regulatory responsibilities
10. Where there is a health and safety concern that will impact staff/visitors/customers

Call in and Urgency:

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

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No

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Key Decision:

A matter which affects two or more wards, or has significant financial implications

Yes

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No

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1 Introduction

- 1.1 The Council's Telephone Call Recording procedure and policy has been in place since 2009, with updates occurring when Contact Centre software changes were introduced and applied, or for legislation and compliance requirements.
- 1.2 Due to improvements in Contact Centre technology, part of the standard software package is that the platform records both telephone calls and officer screen activity, whilst handling a customer telephone call.
- 1.3 Following the recent installation of our new Contact Centre technology to the Genesys CX Platform, it is appropriate to review and update the Telephone Call Recording procedure and policy, to also include screen recording and update any legislative changes. The software allows for officer screen recordings to take place, which is optional and controlled by the Council, while telephone call recording is mandatory and already in use at WLDC.
- 1.4 Due to the volume and varied contact to the teams using the Genesys CX Platform, it is beneficial to enable screen recording to:
 - I. Protect Customers against staff misuse/mishandling their data
 - II. Use the recordings as part of a formal complaint, data breach investigation or staff disciplinary, these recordings may be retained for longer than 6 months to aid the investigation.
 - III. Continued coaching and development, using recordings as a means of enhancing the skills of our staff.
 - IV. Undertaking performance management reviews as part of staff ongoing coaching and development in line with our Customer Experience Strategy.
 - V. The monitoring of our systems to improve the customers experience in line with our Customer Experience Strategy
 - VI. Capturing error messages during system outages/issues
 - VII. Transition to new software changes and future phases of the delivery of the Genesys CX Platform.
 - VIII. Checking compliance with our regulatory responsibilities
 - IX. Where there is a health and safety concern that will impact staff/visitors/customers

(NB: Currently it is not proposed to use screen recording in Revenues and Benefits as we need to ensure that screen recording complies with our Memorandum of Understanding agreement with the DWP)

2. Telephone Call and Screen Recording Policy

- 2.1 The Telephone Call and Screen Recording Policy will ensure:
 - I. All recordings will be stored securely within the Council's Data Centre with additional protections, using a range of encryption methods, to protect those recordings.

- II. All recordings will be processed in accordance with the UK General Data Protection Regulation (UK GDPR).
- III. Customers can request the deletion of their data if it is not relevant to any ongoing investigations. To do this the customer needs to make a request to the Data Protection Officer by emailing dpo@west-lindsey.gov.uk
- IV. Customers can request access to their call recordings, by submitting a SAR with their telephone number, date, and time of the call, to the Data Protection Officer by emailing dpo@west-lindsey.gov.uk
- V. Customers are notified about recording via our website and during the initial call greeting along with details on how to access our Privacy Policy which refers to how their data is stored and used.
- VI. All WLDC Genesys CX Platform users will receive guidance on this policy and procedures (see appendices) and their responsibilities regarding recording.
- VII. Any incidents involving the misuse of recordings will be reported to the Data Protection Officer immediately via our Data Breach procedures.

3. Telephone Calls

3.1 All calls made from or received into the Customer Services Team and the Revenues and Benefits Teams will be recorded, without exception. When a call is transferred outside of these teams, recording of the call ceases. The recordings will only be used for the purposes set out in this policy.

3.2 Recordings will be held securely and only accessible to authorised managers and supervisors and are retained for no longer than 6 months, these are then automatically deleted by the system. Call recordings may be kept longer than this as outlined in 1.4 (I to IX)

4. Screen Recording

4.1 Screen recordings will be kept for 3 months and then automatically deleted. Recordings may be kept longer than this as outlined in 1.4 (I to IX)

4.2 Screen recording will be held securely and only accessible by authorised managers and supervisors. The screen recording option will be reviewed at the end of 2025/6 to establish its usefulness.

4.3 Screen recording commences when a telephone call is answered and continues throughout the wrap up/administrative period. Recording ends when the officer's status changes from "wrap up" to "ready".

5. Legal Considerations

5.1 All recordings will be used fairly, and we will comply with the requirements of relevant legislation, including:

- I. The Regulation of Investigatory Powers Act 2000
- II. The Telecommunications (Lawful Business Practice) (Inception of Communications Regulations) 2000
- III. The Telecommunications (Data Protection and Privacy) Regulations 1999
- IV. Payment Card Industry Data Security Standards (PCI DSS)
- V. UK General Data Protection Regulation
- VI. Data Protection Act
- VII. The Human Rights Act 1998

6. The Scope

6.1 All telephone calls made from or received into the Genesys CX Platform will be recorded. Only the Customer Services Team will undertake screen recording, unless advised otherwise, as part of a pilot to establish its usefulness.

6.2 Normally, all telephone calls and screen recordings will not be retrieved or monitored unless required for the purposes as listed above in section 1.4

6.3 This policy will be produced in the WLDC agreed format and will be reviewed annually or sooner for any legislative changes including GDPR.

6.4 The Appendices have been created in a user-friendly format for use by staff and customers as required.