

## Appendix One - Telephone Call and Screen Recording Procedure

<b>Document Control</b>			
Organisation		<b>West Lindsey District Council</b>	
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<b>Revision History/date</b>	<b>Reviser</b>	<b>Previous version</b>	<b>Description of revision</b>
2019	Lyn Marlow	2009	Amended job titles
July 2025	Lyn Marlow	2019	Included Screen Recording to this procedure.  Review of this new procedure at Management Team, JSCC and for the policy/procedures to be adopted at CP&R

### **Telephone Call and Screen Recording Procedure**

#### **1: Purpose**

- 1.1 The purpose of this procedure is to govern Call and Screen Recordings within West Lindsey District Council, and how access to and use of those recordings is managed.
- 1.2 The implementation of Call and Screen Recording supports effective coaching, training and performance monitoring. It supports the delivery of excellent customer services, across high contact teams, to enable the Council to deal efficiently with internal or external complaints, investigations, implementation of

the Customer Experience Strategy and continued delivery of excellent customer service.

## **2: Scope**

- 2.1 The procedure aims to minimise intrusion by restricting access to and use of recordings being limited to specified purposes only.
- 2.2 This procedure outlines:
  - a) Recorded information
  - b) Purposes of Call & Screen Recording
  - c) Access and availability
  - d) Information Security (GDPR)
  - e) Monitoring and review

## **3: Recorded Information**

- 3.1 All contact received via Genesys CX Platform will be recorded, stored securely for up to 6 months for telephone calls and 3 months for screen recordings and will then be automatically deleted, unless highlighted for the purposes of an investigation.
- 3.2 Calls currently included in the call recording scope are for the following services:
  - a) Customer Services
  - b) Revenues
  - c) Benefits
- 3.3 Calls transfer to the back office that are received by the Genesys CX Platform will cease recording upon transfer.
- 3.4 Call recording will apply to outgoing and incoming calls via the Genesys CX Platform.
- 3.5 Calls and screen recording, where the customer is making a payment will be subject to a mid-call solution to comply with Payment Card Industry Security Standards (PCI-DSS), ensuring that the Council will not hold any credit/debit card data and staff do not have access to customer credit/debit card details.

## **4: Purposes of recording**

- 4.1 The purpose of call and screen recordings is to provide an exact record of the contact as set out below:
  - a) Protect Customers against staff misuse or mishandling their data
  - b) Use the recordings as part of a formal complaint, data breach investigation or staff disciplinary, this may result in these recording being retained for longer than 6 months to aid the investigation.

- c) Continued coaching and development, using recordings as a means of enhancing the skills of our staff.
  - d) Undertaking performance management reviews as part of staff ongoing coaching and development in line with improving our customer experience when dealing with the Council.
  - e) The monitoring of our systems to improve the customers experience in line with our Customer Experience Strategy
  - f) Capturing error messages during system outages and issues
  - g) Transition to new software changes and future phases of the delivery of the Genesys CX Platform
  - h) Checking compliance with our regulatory responsibilities
  - i) Where there is a health and safety concern that will impact staff, visitors or customers
- 4.2 Recordings may also provide evidence for crime prevention, although this is not the primary purpose of the recordings. We will, where requested, co-operate with any police investigation which may include providing access to recordings.

## **5: Internal access and availability**

- 5.1 Access to recordings will be carefully controlled in accordance with UK GDPR requirements.
- 5.2 Only those with the appropriate authority can access recordings. (See Appendix 2)
- 5.3 Access to recordings may happen for several reasons. We anticipate the main reasons will be as outlined in 4.1 above.
- 5.4 The Managers and Supervisors of Genesys CX Platform users routinely review telephone calls and where accessible, screen recordings to undertake performance monitoring of staff. An audit trail exists for these recordings that are accessed.
- 5.5 Recordings will also be viewed where a complaint, a GDPR, HR or a criminal investigation is underway or where the Business Team are carrying out system admin functions that require a review of recordings.
- 5.6 Recordings may be downloaded if required as part of evidence in an appeal, hearing or employment tribunal, these recordings will be sent via email as an audio file attachment. (See Appendix 2)
- 5.7 Authorisation to review recording will be granted in accordance with the attached process (See Appendix 2)

## **6. GDPR**

- 6.1 A Data Protection Impact Assessment (DPIA) has been carried out in conjunction with the Council's Data Protection Officer in June 2024 and was

reviewed in January 2025, the next review will be January 2026 unless legislation changes.

- 6.2 Recordings constitute the personal data of the caller and the officer dealing with the customer. Therefore, they will be managed in such a way that the rights of the data subject (callers and officers) can be fulfilled, and all obligations of the data controller (WLDC) are observed, as per our data protection policy.
- 6.3 Every caller who telephones 01427 676 676 will be notified that the call may be recorded and why, before the conversation commences. This is done through a pre-recorded message within the council's telephone welcome message before a connection is made to an officer. Details of call recording and the Council's GDPR requirements are also available on our website
- 6.4 Call Recordings will be retained for 6 months and screen recording for 3 months and then automatically deleted by the Genesys CX system in accordance with GDPR.
- 6.5 Recordings may be retained beyond 6 months under the following circumstances:
  - a) Where a formal complaint, data breach investigation or staff disciplinary is underway.
  - b) Where a compliance audit or check regarding our regulatory responsibilities is underway.
  - c) There is an ongoing health and safety, cyber-attack or criminal investigation.
- 6.6 Staff need to be aware that customers have the right to request access to recordings of their own calls, via the council's subject access request procedures.
- 6.7 Recording will be located by the customer's telephone number, date and time of the call and the officer's identity
- 6.8 Recordings will generally be emailed to customers. Exceptions to this will be reviewed as they occur.
- 6.9 Screen recordings are not available to customers due to the sensitive nature of our IT systems, which are captured during screen recording.