

**Introduction and Purpose of the System**

* 1. The Call Recording System can record inbound and outbound telephone calls from whichever extension numbers are logged into the system.
	2. The primary purpose for call recoding is for training and awareness. Recorded calls will also be used for quality monitoring and/or complaint handling. This will mostly be used by customer service team, it may also be used for the purpose of protecting other colleagues from false allegations aggressive, inappropriate, or vexatious callers and ASB cases.
	3. Calls will be monitored and stored so that they can be referred to at a later date and up to 90 days. [[1]](#footnote-1) Calls may be retained for a longer period of time, in some circumstances, if staff have downloaded the calls within those 90 days. Their retention will then become subject to the Document and Data Retention Policy.
	4. The storage limitations of the BT Cloud system are up to 100,000 individual call recordings within a 90 day period.
	5. All inbound and outbound external calls will be recorded by default, when using the BT Cloud App. A recorded message will play at the start of the call to inform callers that the call is being recorded and with further details / privacy information available on our website.

**Data Protection**

1. Calls will be identified by telephone number. We are also able to link to calls via the time and date they were made.
	1. Personal Data collected is dependent on the nature and type of call, however the typical exchange of personal data will involve personal identifiers such as name, address, post code, telephone number and reason for calling.
	2. A copy of a Telephone Recording by an individual can be requested by way of Subject Access Request (please refer to Subject Access Request Policy and Form). Any Subject Access Request received must be passed to the Data Protection Officer / Finance & Resources Director to be dealt with accordingly.
	3. Data can be disclosed to third parties in accordance with Appendix 1.
	4. Personal data will be processed and stored in accordance with UK GDPR[[2]](#footnote-2) and North Wales Housings GDPR and Data Protection Policies and Procedures.
2. Data will be backed-up in the BT/Ring Central cloud storage system.
3. Usage of the system is strictly limited and authorised for the above intended purpose listed in section 1. Any member of staff found misusing the system or breaching any North Wales Housing Policy or Procedure, will be dealt with in accordance with the NWH Disciplinary Policy.
4. North Wales Housing IT 3rd party providers are granted administrative access to the system for the purposes of Service and maintenance etc.
5. PCI Compliance – As all calls will be recorded by default, there is to be no exchange of PCI data or other financial data (such as credit/debit card) and therefore calls for payments must continue to be diverted to Allpay.
6. **Review of Policy**

This policy will be reviewed every three years or when any change in legislation is introduced.

1. **Responsibilities In applying this policy**

All members of staff must comply with NWH Data Protection Policy and ensure that all personal information supplied by customers is protected at all times.

Any staff found abusing the Call Recording system will be subject to disciplinary action.

**Example 1:** Accessing calls without good reason/authorised access/approval.

**Example 2:**Copying, recording or distributing of call recordings without authorisation.

Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

Any confirmed or suspected Data Breaches will be dealt with in accordance with the Information Security and Data Breach Policy.

1. **Complaints**

Any complaints about the NWH call recording system should be addressed to the Customer Service Team Leader at North Wales Housing and will be dealt with jointly by them and the Data Protection Officer.

Complaints will be investigated in accordance with Section 8 of this Policy.

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk ).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

**Contact details of the ICO:**

**The Information Commissioner**

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 / Fax: 01625 524 510

Email: casework@ico.org.uk

Website:  <https://ico.org.uk>

**Appendix 1**

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|   | **Reasons for Releasing / Reviewing Call Recordings**  | **Authorisation for Releasing / Reviewing Call Recordings**  |
| 1  | Promote the health, safety and security of residents, staff and other users. | Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer  |
| 2 | Assist in the prevention of crime, anti-social behaviour, public order offences and other statutory enforcement issues and in any subsequent apprehension and prosecution of those found to be responsible for these actions. e.g. Police  | Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer  |
| 3 | IT Support Services (including 3rd party IT Provider) in conjunction with a valid request from the relevant manager.  | Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer  |
| 4 | Where there is a reasonable suspicion that a member of staff is in breach of an NWH policy or procedure and for the purposes of any investigation.  | Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer  |
| 5 | Training and quality monitoring. | Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer  |
| 6 | Complaint handling. | Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer  |

**RELEASE OF CALL RECORDING TO 3rd PARTIES - REQUEST FORM & AUTHORISATION**

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| 1. **Date, time and telephone number (if known):**

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| 1. **Person requesting the recording:**
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| 1. **The purpose for which recording is being requested (must be in line with Policy and lawful basis under UK GDPR Data Protection Act considered):**
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| 1. **Is this on behalf of Third Party:**
 | **Yes**  |   | **No**  |   |
| If Yes, please include details:     |

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| 1. **Date of request:**
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Recordings shall remain the property of NWH and are only to be used for the purposes agreed on release.

**Name/Job Title of person in receipt of Recording:**

**Date of disclosure:**

I \_\_\_\_\_\_\_\_\_\_\_\_\_authorise the release of the above recording in accordance with NWH’s Call Recording Policy and Procedure.

(To be completed by Customer Service Team Leader / Assistant Director of Communities / Data Protection Officer as specified in Appendix 1 of this policy).

Date of Authorisation:

1. Managers who seek to rely on the future usage of any recorded calls, should download them as soon as practicable or before the 90 default expiry period. Requests can also be made to the IT Helpdesk. [↑](#footnote-ref-1)
2. UK GDPR means the GDPR as transposed into United Kingdom national law by operation of section 3 of the European Union (Withdrawal) Act 2018, together with the Data Protection Act 2018, and other data protection or privacy legislation in force from time to time in the United Kingdom. [↑](#footnote-ref-2)