



Contact Centre Call Recording Policy

June 2020

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Policy owner:	Community Engagement, Connected Communities
Approved by:	Gary Murphy, CEO
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Purpose

1. The purpose of this Policy is:
 - a. To provide guidance to the community and Central Coast Council staff on the purpose of recording incoming and outgoing calls to the Customer Contact Centre (Contact Centre).
 - b. To govern the procedures and management of access and use of telephone recordings.
 - c. To support effective training and delivery of excellent customer service, and
 - d. To enable the council to deal efficiently with internal or external complaints.

Policy summary

2. This Policy details Council's approach to the recording of calls in Council's Contact Centre. It covers notification to the community and staff, customer requests not to have calls recorded, outlines the reasons that recordings can be accessed, and what measures are in place to ensure records are securely stored to ensure privacy is maintained.

Background

3. Central Coast Council (Council) is committed to providing quality customer service and aims to respond to greater than 80% of enquiries to our Contact Centre at that first point of contact. Call recording provides the ability to:
 - a. establish the facts in the event of a complaint either by a customer or a member of staff and so assist in resolving it;
 - b. help identify officer training needs and to support training new and existing officers; and
 - c. assist in Council's quality control to identify any issues in Council processes, with a view to improving them.
4. Council regularly surveys customer satisfaction and strives for continuous improvement. From time to time Council receives feedback about the information customers have provided or the manner in which the information was delivered by Contact Centre staff, which may result in an investigation being undertaken. Often the accounts of the interaction do not align and it is difficult to determine the best way to resolve the matter. Having access to call recording reduces misunderstanding, improves accuracy and allows the facts of the interaction to be considered.

Scope

5. This Policy covers personnel employed by Council; any person or organisation contracted to or acting on behalf of Council; and any person or organisation employed to work on Council premises or facilities and all activities of the Council. The policy is particularly relevant to any person working in Council's Contact Centre and to customers who call our Contact Centre.

General

6. **Notification to staff:** Staff working within the Customer Contact Centre will be notified that incoming and outgoing calls will be recorded when they commence in the position. Existing staff will be notified that call recording is being enabled.
7. **Notification to customers:** Council will advise customers via the IVR that calls to the Contact Centre are recorded in the following manner:
 - A message on the phone system that they will hear before they reach an Officer in the Contact Centre stating:

“Calls are recorded for quality and training purposes.”
 - A notice on Council’s website on the ‘Contact Us’ page.
 - In the Community Feedback and Complaints Handling Policy.
 - In the case of outgoing calls, the staff member is to advise the customer at the commencement of the call that the call will be recorded.
8. **What calls will be recorded:** All incoming and outgoing phone calls with Council’s Customer Contact Centre via 1300 463 954 will be recorded, except those identified in paragraph 9.
9. **When a customer declines to be recorded:** Where a customer requests not to have their call recorded, the Customer Service Officer taking the call will disable the call recording function. Refer to Procedure: Requests For Calls Not To Be Recorded.
10. **Reasons we record:** The reasons for recording and approved reasons why recordings can be accessed include:
 - To identify Contact Centre staff training needs;
 - To improve Contact Centre staff performance and consistency in information provided;
 - To protect Contact Centre staff from abusive or nuisance calls;
 - Establishing the facts in the event of feedback or a complaint made either by a customer or a member of staff, to assist in resolving it;
 - To assist in quality control to identify any issues with Contact Centre processes, with a view to improving them;
 - To confirm that calls have been accurately transcribed into Council’s Customer Relationship Management (CRM) system or other corporate databases;
 - Evidence for use in crime investigation or prevention purposes;
 - To assist in the defence of legal claims.

11. **Storage of recordings:** Recordings constitute the personal data of both the caller and the operator. Therefore they will be managed in such a way that the rights of data subjects (callers and operators) can be fulfilled, and all the obligations of the data controller (Central Coast Council) are observed, as per the council's Privacy Management Plan. The recordings will be stored in Council's call centre software system for a period of three months in line with State Records Act (1998) requirements. Following a period of three months, the audio records are permanently and securely deleted. Where it is identified that the content of the call may be required for evidence or investigation purposes beyond a period of three months, the call recording file can be extracted and securely stored.
12. **Who has access to the recordings:** Requests for access to recordings by internal staff must be made by way of the form in [Appendix 1](#) of this Policy. Customers/callers have the right to listen to or have copies of recordings made of their own calls, requests for access need to be made via the Council's Informal GIPA applications process.
13. **Credit Card Payment requests:** Alternate payment channels are available and payments with credit card via the Contact Centre are discouraged. In the case where a Customer Service Officer is required to process a payment for Council Services via credit card over the phone, the customer is to be advised that the recording will be paused so that credit card details will not be retained in the recording. Recording is to recommence immediately after the credit card number is confirmed.
14. **Selection of calls for training and quality assurance purposes:** Calls will be selected at random to be reviewed by the Customer Service management team. The reviewer will maintain a record of the date and time of the calls.
15. **Reviewing calls for investigation or legal claim purposes:** Where call recordings need to be reviewed to assist with investigations or legal claims, approval to access the files is to be sought from the Unit Manager Community Engagement. The request to access customer contact call recording ([Appendix 1](#)) is to be completed and forwarded to the authorised officer for consideration. The recordings are to be replayed in an enclosed area.

Compliance, monitoring and review

16. Suspected breaches or misuse of this policy are to be reported to the Chief Executive Officer. Alleged breaches of this policy shall be dealt with by the processes outlined for breaches of the Code of Conduct, as detailed in the Code of Conduct and in the Procedures for the Administration of the Code of Conduct.

17. Staff must maintain all records relevant to administering this policy in a recognised Council recordkeeping system.
18. This policy will be reviewed every two years or when significant changes to the call recording system take place.

Definitions

19. In this policy:
 - a. **Council** means Central Coast Council (CCC) and in context, elected Councillors, staff of Central Coast Council and engaged representatives.
 - b. **Monitoring** means listening to and/or recording communications.
 - c. **CCC** means Central Coast Council.

Related resources

20. Legislation:
 - a. [Telecommunications \(Interception and Access\) Act 1979](#) (Cth)
 - b. [Surveillance Devices Act 2007](#) (NSW)
 - c. [Local Government Act 1993](#) (NSW)
 - d. [State Records Act 1998](#) (NSW)
 - e. [Privacy and Personal Information Protection Act 1998](#) (NSW)
 - f. [Health Records and Information and Privacy Act 2002](#) (NSW)
 - g. [Workplace Surveillance Act 2005](#) (NSW)
21. Associated Council documents:
 - a. [Code of Conduct](#)
 - b. [Complaints and Feedback Management Policy](#)
 - c. [Privacy Management Plan](#)
 - d. Customer Service Procedure: Request for Calls Not to be Recorded
 - e. Customer Service Procedure: Request to Access Call Recording
 - f. Customer Service Procedure: Outgoing Calls to Customers and Call Backs.

Appendix 1: Request to Access Customer Contact Call Recordings

Date			
Officer requesting record			
Officer Title			
Reason access Requested (tick)	<input type="checkbox"/>	Call Centre monitoring / identifying Customer Contact staff training needs;	
	<input type="checkbox"/>	Improving Customer Contact staff performance and consistency in information provided;	
<input type="checkbox"/>	<input type="checkbox"/>	Protecting Customer Contact staff from abusive or nuisance calls;	
<input type="checkbox"/>	<input type="checkbox"/>	Establishing the fact in the event of a complaint made by a customer;	
<input type="checkbox"/>	<input type="checkbox"/>	Establishing the facts in the event of a complaint made by a staff member;	
<input type="checkbox"/>	<input type="checkbox"/>	Assist in quality control to identify any issues with Customer Contact processes, with a view to improving them;	
<input type="checkbox"/>	<input type="checkbox"/>	Confirming that calls have been accurately transcribed into Council's Customer Relationship Management (CRM) system or other corporate databases;	
<input type="checkbox"/>	<input type="checkbox"/>	Evidence for use in crime investigation or prevention purposes;	
<input type="checkbox"/>	<input type="checkbox"/>	To assist in the defence of a legal claim.	
Date of Recording			Approx. time of recording
Phone number Recorded (if known)	External number		Internal number
Additional Request notes			

Approval granted	Yes	No		
Name of approving officer			Signature of approving officer	
Names of Officers present				
Signatures of Officers present				
Date recording reviewed				

History of revisions

Amendment history	Details
Original approval authority details	 <hr/> Gary Murphy - Chief Executive Officer <hr/> 30 June 2020 <hr/> This Central Coast Council policy replaces the former Wyong Shire Council policy in relation to customer service call recording. It provides guidance to the community and Central Coast Council staff on the purpose of recording incoming and outgoing calls to the Customer Contact Centre, and governs the procedures and management of access and use of telephone recordings. The policy supports effective training and delivery of excellent customer service, and enables Council to deal efficiently with internal or external complaints.