

CALL RECORDING PROTOCOL

POLICY & GUIDANCE v.2

Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available on the Council's Intranet, and which supersedes all previous versions.

Those to whom this policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
Feb 2013	New	Executive Committee/BE&S / HICT	1 of 3
Chief Officers' Management Team Approval:		22.01.2013	
Union's Notified: Unison & Unite the Union		17.01.2013	
Executive Committee Approval:		03.01.2013	

History or Most Recent Policy Changes – MUST BE COMPLETED		
Version:	Date:	Change(s):
v.2	October 2025	This updated version ensures compliance with the Data Protection Act 2018 and the Equality Act 2017, it clarifies employees' responsibilities regarding callers who record conversations, and it provides clear guidance on managing those calls.

1. Statement

Douglas City Council records telephone calls to support effective training, ensure excellent customer service and to manage complaints efficiently, in full compliance with the Data Protection Act 2018 and the Equality Act 2017.

2. Introduction

2.1 The Council records telephone calls (Reception and Housing Services) made to and from the Council's voice-recording telephone system, managed via a Voice-over Intranet Protocol (VOIP), accessible only by authorised administrators. No calls outside the system are recorded.

2.2 Recordings protect employees and the Council, allow investigation of abusive or insulting behaviour, and monitor the quality of service. Calls are normally retained for 3 months and then deleted, except where retention is required for legitimate reasons as set out below.

2.3 The Council is authorised to record calls under the Telecommunications Act 1984 (as applied). This policy applies initially the main Reception, City Hall and Housing Services). The Head of Digital & Information will maintain and publish a list of all teams with call recording is used.

3. Purpose of Call Recording

3.1 The Council record calls to:

- investigate complaints made by employees against callers
- monitor and improve service quality
- identify training needs and improve employee performance
- protect employees from abusive or nuisance calls
- establish facts in complaints by callers or assist resolution
- provide evidence for crime prevention/detection when necessary

4. Use and Access of Recordings

4.1 Access to recordings will be strictly controlled and should be made via the Assistant Chief Officer (Democratic Services) or the Head of Digital & Information:

- employees may request to hear their own calls provided they have a valid reason for their request, this will usually be provided within 5 working days
- employees may request recordings where they have experienced rude or threatening behaviour so that appropriate action may be taken
- Heads of Service or authorised officers may review recordings in relation to complaints or for quality assurance and training purposes. All accessed recordings are logged and retained for 1 year
- recordings may be used in disciplinary procedures and will be made available to the employee
- all requests must be authorised by the Chief Executive or the Head of Digital & Information.

5. Notification and Consent

- When calling the Housing Services or Reception telephone numbers, callers will be notified at the start of each call that they call may be recorded.
- If a caller informs an employee that they are recording the call, or the employee is alerted automatically that the call is being recorded, the employee should:
 - end the call politely, advising the caller that the call cannot continue as it is against Council policy

Guidance:

I have just been notified that you are recording this conversation. In accordance with Council policy, I am unable to continue with the call while it is being recorded however, we can continue this conversation via email or in a meeting.

- The employee should inform their line manager immediately.

6. Data Protection and Equality Considerations

Call recordings are personal data of both callers and employees and are processed in accordance with the Data Protection Act 2018. All data subject rights will be respected, including access, rectification and erasure where applicable.

Reasonable adjustments under the Equality Act 2017 will be made to accommodate individuals with disabilities or other protected characteristics, including alternative communication methods on request.

In exceptional circumstances, when call-recording may cause distress, callers unwilling to be recorded will be transferred to a non-recorded line at management discretion.

This policy can be accessed on the Council's website and intranet.

7. Retention of Recordings

Recordings will usually be retained for 3 months, then deleted unless:

- Retained for complaint investigation until completion and any appeal or tribunal period ends
- Used for training purposes
- Retained as evidence related to the Council's unacceptable behaviour procedures or unreasonably persistent complainants

8. Breach of Procedure

Any employee suspecting there has been a breach of this policy should raise the matter promptly with their line manager or a more senior officer if appropriate.

9. Review of Policy

Protocol, policy and guidelines will be reviewed every 3 years.