

# Call Recording Policy

VERSION 3



CITY OF STONNINGTON CALL RECORDING OPERATING POLICY

**Policy Owner**

Organisational Capability – Customer Operations

**TRIM folder**

COS19/245

**Approval date**

13<sup>th</sup> July 2023

**Approved by**

CEO – Rick Kwasek

**Review date**

Every 24 months – June 2025

**Version history**

Call Recording Policy	Adopted by Council on March 2018	
Call Recording Policy	Reviewed on March 2021	- No changes made
Call Recording Policy	Reviewed June 2023	<ul style="list-style-type: none"> <li>- New format</li> <li>- <i>Scope: updated to include working from home</i></li> <li>- <i>Scope: if the call is answer by a staff member working at home that is unable to stop call recording, the call will be transferred to an officer working onsite.</i></li> <li>- <i>Responsibilities: Titles updated</i></li> <li>- <i>Policy/principle: section</i></li> <li>- <i>Background: section added</i></li> <li>- <i>General: section added</i></li> <li>- <i>Appendix: added to policy</i></li> </ul>


## Introduction

- The City of Stonnington (Council) is committed to providing quality customer service and continuous improvement.
- Call recording is used as a mechanism to coach, instruct and train call centre staff in dealing with phone enquiries from the community and provides significant advantages to traditional forms of call monitoring by supervisors.

## Purpose

- The purpose of recording service centre calls is to improve the quality of Stonnington's customer service by:
- Improving the standard of call handling through coaching of call centre and customer service officers,
- Checking compliance against service commitments and documented procedures,
- Assisting in training and development of for new and existing officers,
- Supporting the Customer Service and service centre in delivering appropriate services to the broader organisation; and,
- To investigate complaints about the handling of a call by an officer or call recipient.

## Scope

- Call recording will be used on all inbound calls to Council's central telephone number unless a customer requests that the call is not recorded or if the Customer Service is working from home on a hard phone line.
- Calls from call centre staff to other Council numbers will not be recorded. The call will not be recorded beyond the point by which the call is transferred to an officer.
- Calls made directly to and from all other inbound Council numbers will not be recorded.
- Calls relating to credit card transactions will not be recorded. If a call recording cannot be paused if the Customer Service officer is working from home then the caller will be transferred to a cashier on site who can pause the recording.

## Objectives

- To ensure that the call recordings, their use and storage are in line with existing legislation and Council policy on privacy.
- To provide a resource for internal coaching and training purposes.

## Policy/Principle

This Policy details Council's approach to the recording of calls within Council's contact centre. It covers the notification to the community and staff, how a customer can request not to be recorded, outlines the reason that recordings can be accessed, and what measures are in place to ensure records are securely stored to ensure privacy is maintained.

## Background

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

## General

**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.

**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."*

**What calls will be recorded:** All incoming phone calls with Council's Customer Contact Centre via 03 8290 1333 will be recorded, except when a customer requests the call not to be recorded, when some officer are working from home or when a customer is making a payment over the phone using a credit card.

**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.

**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 defense of legal claims.

**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 (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 two years in line with State Records Act (1998) requirements. Following a period of two years, 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 two years, the call recording file can be extracted and securely stored.

**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 Freedom of Information applications process.

**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.

**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.

**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 Manager Customer Operations. 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.

## Definitions

- **Council** means The City of Stonnington Council and in context, elected Councillors, staff of Central Coast Council and engaged representatives.
- **Monitoring** means listening to and/or recording communications.
- **System** refers to Verba Call Recording system
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## Responsibilities

Party/parties	Roles and responsibilities
Manager Customer Operations	Authorising export of call recordings from the server.
Customer Service Coordinator	Exporting calls as requested by the Manager Customer Operations.  Logging exported calls in the Call Recordings Access Register.  Ongoing monitoring to identify staff training needs or improving performance and consistency of information provided

Freedom of Information  
Officer

Process requests from law enforcement agencies.

Executive Team

Provide guidance on likely issues of interest from Council meetings or briefings.

Provide guidance on the development of media responses.  
Act as subject matter experts in the development of proactive media releases, including raising opportunities with the Communications and Engagement team.

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All council officers,  
volunteers and contractors

Adhere to the Policy

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## Monitoring, Evaluation and Review

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

## Related Legislation and Policies

There are a range of legislation, codes and Council documents that inform and support this Policy. These include, but are not limited to:

Legislation	Council documents
<p><b>Commonwealth Legislation</b></p> <ol style="list-style-type: none"> <li>1. Privacy Act 1988; (as amended)</li> <li>2. Evidence Act 1995</li> <li>3. Telecommunications Act 1997</li> </ol> <p><b>Victorian Legislation &amp; Regulations</b></p> <ol style="list-style-type: none"> <li>1. Surveillance Devices Act 1999;</li> <li>2. Surveillance Devices Regulations 2016;</li> <li>3. Privacy and Data Protection Act 2014;</li> <li>4. Freedom of information Act 1982;</li> <li>5. Public Records Act 1973; and</li> <li>6. Occupational Health &amp; Safety Act 2004.</li> <li>7. Evidence Act 2008</li> </ol>	<ul style="list-style-type: none"> <li>• Call Recording Operating Procedure</li> </ul>

### Human Rights review and statement

The framework content of this Policy has taken into consideration the requirements derived from the *Victorian Charter of Human Rights and Responsibilities Act 2006*.



Appendix 1: Request to access customer contact call recordings

Date		
Officer Requesting call recording		
Officer title		
Reason for request (tick)		Protecting call centre staff from abusive or nuisance calls
		Establishing the fact in the event of a complaint made by a customer or staff member
		Assist in quality control to identify any issues with Customer Service process, with a view of improving them
		Evidence for use in a crime investigation or prevention purposes
		To assist in the defence of a legal claim
Date of recording		
Approximate time of recording		
Phone number recorded (if known)		
Name of Customer Service officer (if known)		
Additional notes		

Approval Granted	Yes	No
Name of approving officer		
Name of officer's present to listen to call.		
Date recording reviewed		