

Privacy Notice – Call Centre Call Recording

South Hams District Council & West Devon Borough Council (“The Councils”) take your privacy seriously. This notice sets out what we will do with your personal information and who we may share it with. We operate a shared call centre and so the privacy notice applies regardless of which Council you contact.

How we use your information

We collect and retain personal information, in various formats, in order to deliver services to you.

We may record your call which may include any personal information you provide to us. Note that bank details and card payment details are not recorded.

We may use Information held within a call recording in the following ways:

- **Quality and Training Purposes** - Written records only provide partial information. A call recording provides a more rounded view and allows us to better understand customer experience and assess the processes applied. This can help us identify any improvement areas and ensure the quality of service provided by Customer Contact Officers, by using the information within the recording to inform training subjects and individual employee continuous improvement plans
- **Complaints and Disputes** - Some calls are verbally resolved. Where information is entered onto an electronic system this becomes the established record. In the event of a complaint or dispute, a call recording (if available), may provide additional information to help us investigate any allegations, to protect the interests of the subject matter and/or the Council by using the information within the recording to respond to complaints regarding the Contact Centre and/or other Council services.
- **Legal Claims** - For use in the defence of legal claims against the Council
- **Employee Safety and Wellbeing** - A recording may become a vital piece of evidence in the event of any threats being made to the Council or an individual.

The personal information you provide will not be used for any other purpose unless required by law, to prevent or detect crime or to protect public funds.

The source(s) of personal information provided during a call to the Contact Centre may include:

- Information provided directly by you
- Information provided by another member of the public (e.g. complaint or concern)
- Information provided by an elected Councillor on behalf of you
- Information provided by other organisations (e.g. Emergency Services, Landlords) regarding an individual.

Calls that are transferred from the call centre to an officer within the wider Councils will only be recording for the call centre part. The Councils do not record internal calls or calls that have been passed from the contact centre to other officers.

Length of time we keep your information

We will retain recordings into the call centre for a period of 3 calendar months from the date of recording. Please note, until 15th July 2020 we only retained recordings for 1 calendar month.

Sharing your information

The personal information you provide will not be shared outside of the Councils for any purpose unless required by law, to prevent or detect crime or to protect public funds.

Your personal data may be converted ('anonymised') into statistical or aggregated data in such a way that ensures that you cannot be identified from it.

Retention & Transferring of data outside of the EU

We will at all times hold your information securely electronically.

Your personal data will be kept secure by the Council and will be kept within the European Economic Union (EEU). Where the Council uses a third party to store your personal data and it is stored outside of the UK/EEU, the Council will ensure that appropriate safeguards are in place to keep your personal data secure.

Individual rights

You have a number of rights under the General Data Protection Regulations. These can be found on the [ICO Website](#).

The Data Controller for your information

The Data Controller for information you provide for this services is South Hams District Council, Follaton House, Plymouth Road, Totnes, Devon TQ9 5NE or West Devon Borough Council, Plymouth Road, Tavistock Devon PL19 0BZ

The Data Processors for your information

Call recordings are not processed by other organisations

Data Protection Officer

The Council has a duty to appoint a Data Protection Officer. The Council's Interim Data Protection Officer is Neil Hawke, South Hams District Council/West Devon Borough Council, Follaton House, Plymouth Road, Totnes, Devon TQ9 5NE

If you have any queries, would like to exercise your rights or make a complaint, contact the Data Protection Officer by email to data.protection@swdevon.gov.uk telephone 01803 861234 or write to them at South Hams District Council/West Devon Borough Council, Follaton House, Plymouth Road, Totnes, Devon TQ9 5NE

If you are not happy with how we have handled your complaint, you have the right to contact the Information Commissioner's Office to make a complaint about what we do with your information:



- Telephone them on 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
- Visit the [ICO Website](#)
- Write to them at
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Changes to Privacy Notice

15 July 2020 – amended retention period for call recordings from one month to three months