

Process Id# :: 0003
Process Name :: NSSO Voice Recording Policy
Date Last Updated :: 1/7/2019

Description ::

Article 5 of the GDPR sets out the principles relating to processing of personal data. Amongst the requirements are that personal data be processed transparently, for specified and explicit purposes, limited to what is necessary and retained only as long as necessary.

The NSSO has an interactive voice response (IVR) telephone system that is capable of recording conversations. Like many other organisations, this is a standard practice that allows the recording of telephone calls for quality monitoring and training purposes. Incoming calls received via the IVR are recorded by the Shared Services Centre's (SSC) in the NSSO and this is notified to callers at the time the call is connected to the IVR. These recordings will only be used for the purposes specified in this policy.

The call recording facility is automated and only accommodates incoming calls received from outside by the SSC through the IVR only (Main number). Outbound calls to people made from the Shared Service Centre will not be recorded. If calls are transferred within the SSC, the call recording will continue until the call is ended.

Purpose of recording ::

The NSSO in delivered its service records phone calls. This is done for the following reasons ::

1. staff training, coaching and support,
2. to monitoring the quality of call handling and customer service,
3. verification of what was said during a phone call if there is a dispute or complaint,
4. to protect staff from abusive behaviour, and
5. to verify the customer's agreement during certain service requests as appropriate.

Access & Control ::

The conversations are recorded by a third party telecoms provider and uploaded to a secure server on the OGCIO system.

HRSS Calls :: hold the naming convention :: YYYY_MMDD_HHMMSS_NSSONumber_CallerNumber.

PSSC Calls :: hold the naming convention :: 1151_YYYYMMDD_HHMMSS_450839 (a database ref number)

Access will be granted under a Subject Access Request from a data subject once it complies with the policy listed below.

Access by the NSSO for the reasons listed above in 'Purpose' will be limited and strictly controlled.

Permission to access those recordings must be requested from the manager of the of the call centre in PSS or HRSS.

Access permissions to the IVR folders are managed and only named mangers in service management and the contact centre can access the recordings.

Retention Period ::

HRSS Calls :: retained for six months.

PSSC Calls :: retained for three months.

The NSSO notes that recordings of calls contain personal data and sometimes special categories of personal data. The recordings will be retained for the above stated period unless known to be needed for any of the

above listed 'purpose of recording' examples. In such an event the file will be copied for continued access. All other files will be deleted.

Subject Access Request to a voice recording :: NSSO obligations & process

The NSSO will release any held voice recordings on data subjects through the standard Subject Access Request policy to the controller. To identify any calls the data subject will need to make known the date and approximate time of the phone call so it can be located as calls are not linked

1. The data subject will submit a valid SAR to the appropriate controller PSB.
2. The PSB will evaluate the request to determine where the material lies.
3. If the PSB decides the NSSO may have material to contribute to the request it will request the NSSO to provide that data to them.

4. If access to a voice recording is sought then the NSSO will need the date and approximate time of the call and, if possible, the number the data subject dialled from.
 - a. This is to facilitate location of the file which is not mapped to a customers file.
5. The NSSO aims to provide that material within 14 days to the controller.

6. The controller will assess the material provided by the NSSO.
7. The controller is the sole body entitled to determine what material shall be released, redacted or refused and shall be the sole body communicating with the data subject on said matters.