



Gangmasters &  
Labour Abuse Authority

# GLAA Telephone Recording Policy

**30 August 2024**

<b>Document Title</b>	<b>Telephone Recording Policy</b>		
Version	V4	Status	Major
Policy Author	Senior Contact Officer		
Responsible Officer	Head of Contact and Licensing		
Approved by	EMT	Date	30/08/2024
Circulation	All Staff	Date	30/08/2024 (Morecambe)
Associated Legislation Policies, Procedures or Standards	External Communications Policy		
<b>Revision History</b>			
<b>Version Number</b>	<b>Date of Revision</b>	<b>Comments / Reason for Revision</b>	
V.01	14/12/2018	Review of draft document by SLT	
V1.1	18/12/2018	Amendments	
V0.2	18/12/2018	Further amendments due to DPIA being updated	
V2.0	11/02/2019	Final version to EMT for approval	
V2.1	29/03/2019	Amendments from EMT	
V3.0	10/04/2019	Approved at EMT	
V3.1	21/08/2024	Review updates: <ul style="list-style-type: none"> <li>• Policy rewritten to remove references to Anywhere 365 Snapper and instead reference Genesys.</li> <li>• Policy rewritten to make reference to Contact Centre and the role of Senior Contact Officer.</li> <li>• Introduction explaining Genesys queue system added.</li> <li>• Removed reference to Intelligence Manager/Licensing Manager and replaced with "Band 5 for Licensing and Contact Operations"</li> <li>• Section 2 updated to make reference to new systems in place</li> </ul>	
V3.2	29/08/2024	Governance review, accessibility checks and following updates: <ul style="list-style-type: none"> <li>• Text size changed to 12 and subheadings changed to 14.</li> <li>• Paragraphing and numbering updated</li> </ul>	
V4	30/08/2024	Approved by the Director of Operations as only minor changes required.	
<b>For completion if policy is archived</b>			
Reason for archival			
Archival approved by		Archive date	

## 1. Introduction

- 1.1. This document explains the GLAA's policy for recording incoming telephone calls.
- 1.2. The call recording facility is automated and only accommodates incoming calls received from outside the GLAA to 0345 602 5020 (Options 1 and 3) received via the Genesys contact centre system. Outgoing calls through the Genesys contact centre system are also recorded if they are not made on behalf of the GLAA Intelligence queue.
- 1.3. Recording is necessary for quality monitoring, training, compliance, and security purposes. As well as confirming information provided by GLAA employees, recording calls also maintains a record of what was said by the caller in the event of a complaint or compliance investigation into a licence holder and/or enforcement investigation into offences under the Gangmasters (Licensing) Act 2004 and/or any other offences under any other enactment.

## 2. Principles relating to processing of personal data

- 2.1. Recording telephone calls and subsequent handling must not breach any of the six data protection principles:
- 2.2. *"Processed lawfully, fairly in a transparent manner"*.
- 2.3. Callers to the helpdesk (0345 602 5020) will be informed that the conversation is being recorded by the automated message.
- 2.4. *"Collected for specified, explicit and legitimate purposes and not further processed"*.
- 2.5. Recordings will only be used for the purposes specified in this policy.
- 2.6. *"Adequate, relevant and limited to what is necessary"*.
- 2.7. This principle is not relevant to recording only certain incoming and outgoing telephone calls.
- 2.8. *"Accurate and where necessary kept up to date"*.
- 2.9. This principle is not relevant to recording incoming and outgoing telephone calls.

- 2.10. *“Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed”.*
- 2.11. All calls received by the GLAA will be recorded and retained for two years. Calls will be deleted once they are two years old on the next available common deletion date. The common deletion dates are 30 January, 30 May, 30 September annually. The GLAA considers that two years is appropriate as all previous requests have been within this period.
- 2.12. *“Processed in a manner that ensures appropriate security of personal data”.*
- 2.13. Recordings will be stored securely electronically.

### **3. Retrieving Calls**

3.1. Calls will only be retrieved for the purposes of:

- Investigating a complaint
- Management purposes for making sure customer service standards are being met – for example, line manager assurance checks on the Contact Centre
- Checking compliance with regulatory procedures (including investigating compliance with the GLAA’s Licensing Standards)
- Preventing and detecting crime (for example in investigating possible offences under the Gangmasters (Licensing) Act)
- Training and coaching

3.2. Members of staff outside the GLAA Contact Centre can only have access to a recorded call following approval by the Senior Contact Officer, Licensing and Contact Operations Band 5 or the Director of Operations. Requests to listen to recorded calls should be submitted by e-mail to the Contact Centre inbox ([contact@gla.gov.uk](mailto:contact@gla.gov.uk)) and a decision will be made whether the request is in line with this policy.

3.3. The Senior Contact Officer, or the Band 5 for Licensing and Contact Operations, will then share the call. The Senior Contact Officer will document who has made the request, what recording has been retrieved, the purpose for the retrieval, and how the recording has subsequently been used and where the call has been stored.

## **4. Deleting Recordings**

- 4.1. The Senior Contact Officer will be responsible for deleting recordings after the retention period.
- 4.2. Recorded calls will be deleted once they are 2 years old on the next available common deletion date. The common deletion dates are 30 January, 30 May, 30 September
- 4.3. Calls that are retrieved will be deleted in line with the retention schedule for their purpose i.e., prosecution, complaints, licence decisions and appeals. It will be the responsibility of the Senior Contact Officer or the Licensing and Contact Band 5 to delete these retrieved calls.

## **5. Misuse of Retrieving Calls**

- 5.1. It will be a disciplinary matter if call recordings are accessed or deleted without correct approval or not in accordance with this policy.

## **6. Equality Impact Assessment**

- 6.1. An Equality Impact Assessment has been completed.

## **7. Privacy Impact Assessment**

- 7.1. A Data Protection Impact Assessment has not been completed as one was done previously and the DPIA template is currently being updated.

**Report Author:** [REDACTED]

**Senior Responsible Officer:** [REDACTED]