Data Protection Privacy Statement – Call Recording.

To deliver services to the citizens and communities in Bedford Borough, it is necessary for the Council to collect, gather, and process personal data about residents, staff, and other individuals. Bedford Borough Council is committed to protecting your personal data when you use its services and/or correspond with it.

The Council has registered as a Data Controller with the Information Commissioner's Office (ICO). This registration can be viewed on the ICO website (opens in a new window) Registration Number Z5916725.

As a Data Controller, the Council sets out the purposes and methods for processing information and ensures safeguards over any personal and special category information it processes.

The sections below explain what data we are collecting and storing and the arrangements we have in place to protect the information entrusted to the Council.

In relation to Call Recording, Bedford Borough Council will process your personal data for the following processing purposes:

Recording customer conversations allows organisations to assess customer satisfaction, train and develop staff, review call quality, and have access to a verbal record of what is said in the event of a subsequent complaint. It also means employees feel more protected knowing that any threatening behaviour can be evidenced and acted upon where necessary.

- **Quality monitoring –** Written records only provide partial information. 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.
- **Training and Development –** Listening to a sample number of calls, allows managers to identify training needs.
- **Gaining a better understanding of our customers –** Listening to sample calls will help us better understand our customer needs.
- **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.
- **Employee safety and wellbeing –** A recording may become a vital piece of evidence in the event of any threats being made to the organisation or an individual.

The personal data that will be collected:

- Name
- Date of birth
- National Insurance Number
- Addresses, including email addresses

Due to the nature of the service, it is not possible to predefine or limit the types of special category data that may be shared by customers during recorded calls. Customers may voluntarily disclose special category data; therefore, the list below is not exhaustive.

The special category data that will be collected:

- Racial / Ethnic origin
- Religious Beliefs
- Physical/Mental Health
- Child protection data
- Safeguarding Adults data
- Tax, Benefits or pension records
- Health adoption, employment, school, social services, housing data.
- Passport/identification documents.

Bedford Borough Council is processing this personal data by virtue of the following Lawful Basis:

Consent of the data subject - Article 6(1)(a) - This lawful basis applies when the data subject has given explicit consent for their data to be processed for a specific purpose.

Compliance with a legal obligation - Article 6(1)(c) - This lawful basis applies when the processing is necessary for compliance with a legal obligation to which the data controller is subject.

Protecting the vital interests of a data subject or other person (life or death situation) - Article 6(1)(d) - This lawful basis applies when the processing is necessary to protect the vital interests of the data subject or another natural person, typically in situations that are life-or-death emergencies.

The legal basis for processing your special category data is in accordance with the following:

- Article 9(2)(g) Reasons of substantial public interest (with a basis in law)
- Article 9(2)(h) Health or social care (with a basis in law)

The processing of your personal data will be restricted in time to:

A two-year retention period

Your personal data will be held by/for the Council within the UK.

Please see the details below in respect of any other reason we will be using your information:

Data sharing

We may share a call recording with other council services where it is appropriate to do so, such as, to respond to a complaint.

In some circumstances, such as under a court order or safeguarding, we are legally obliged to share information. We may also share information about you with third parties including our data processors, government agencies and external auditors. We will always satisfy ourselves that we have a lawful basis on which to share the information and document our decision-making.

Additionally, we are required under the Public Records Act 1958 (as amended) to transfer records to the City or National Archives (TNA) for permanent preservation. Full consideration will be given to Data Protection and Freedom of Information legislation when making decisions about whether such records should be open to the public.

We have a range of measures to protect the personal data you provide. These include cyber security, physical security of the Council's buildings and training on Data Protection for staff.

Bedford Borough Council is the Data Controller processing your information, who can be contacted as follows:

Data Protection
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford MK42 9AP

Email: dpo@bedford.gov.uk
Telephone: 01234 267422

If you wish to enquire about your rights as a data subject, whether you wish to request a copy of your information that Bedford Borough Council holds, request for data portability; rectification or erasure of your data for any reason or objection to any processing, please get in touch with the Council's UK GDPR Data Protection Officer by emailing dpo@bedford.gov.uk or writing to the above address.

Alternatively, in the event that you remain dissatisfied with the way Bedford Borough Council has handled the processing of your information (i.e. after liaising with the Council to find a satisfactory solution), you have the right to contact the UK's Statutory Authority: The Information Commissioner's Office (ICO) who can be contacted by using the details displayed at the bottom of the page entitled Personal information and your rights | Bedford Borough Council on our website under the "Challenging the response" heading.

Changes to this Notice:

We keep this Privacy Notice under regular review; this Notice was last updated in August 2025.