

# Customer Services Privacy Notice

version 1.0

## Changes to this notice

We keep this privacy notice under regular review and we will place any updates on this web page. This Notice was last updated on 25 Sep 2025.

This privacy notice applies to the Customer Services provided by Worcestershire County Council and should be read in addition to Worcestershire County Council's [Full Privacy Notice](#) and any relevant [service specific privacy notice](#).

The privacy notice will cover:

- [Purpose for processing](#)
- [Personal information collected and lawful basis](#)
- [Who we may share your information with](#)
- [How long we will hold your information](#)
- [Your information rights](#)

## Purpose for processing

Customer Services process personal data to respond to general enquiries, complaints, compliments, and service requests received via telephone, email, online forms and web-assistant bots. The purposes for doing this includes:

- Logging and tracking enquiries and complaints
- Referring queries to relevant services
- Providing information and updates about Council services
- Supporting residents in accessing services
- Monitoring service performance and customer satisfaction
- Identifying any improvement areas for staff in handling customer engagements

## Personal data collected and lawful basis

The service processes personal data which is relevant to individual cases which may include, but is not limited to, the following personal data:

- Name
- Address
- Contact details (email, phone number)
- Contact details for members of your family and support network (if you provide these to us)
- Date of Birth (If relevant to the enquiry/application)
- National Insurance Number (if relevant to the enquiry/application)
- Passport photograph
- Details of your enquiry, complaint or complement

## Customer Services Privacy Notice

- Audio recordings of calls you have with Customer Services
- Any other information voluntarily provided to support your enquiry

We may also process some special category (sensitive) data, which is relevant to individual cases and may include some of the following but is not limited to:

- Health information (e.g. accessibility needs)
- Ethnicity or other demographic data (if voluntarily provided)

The legal bases for processing this personal data are:

- **Consent** (UK GDPR Article 6(1)(a)) – if you are making a general enquiry to the Council, we rely upon consent to process your personal data.
- **Legal obligation** (UK GDPR Article 6(1)(c)) – processing is necessary for the compliance with the law. This includes, but is not limited to, the processing your personal data in the following scenarios:
  - if you are submitting a request under the Freedom of Information Act 2000, Environmental Information Regulations 2004 or a subject rights' request under UK GDPR; or
  - if you are raising a safeguarding concern where the Council may be legally required to share that information with safeguarding teams under the Children Act 1989 or Care Act 2014.
- **Public task** (UK GDPR Article 6(1)(e)) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority under legislation. This is the lawful basis for processing your personal data when:
  - you are making a complaint or raising an issue with a service that the Council is responsible for providing; or
  - you are contacting us about a service that the Council provides; or
  - the Council uses the data to support services delivering statutory functions.

The special category condition for processing is:

- **Explicit Consent** (UK GDPR Article 9(2)(a)) - any special category personal data that individuals may provide in their comments, applications and communications will be processed on the basis of explicit consent as the individual has elected to provide this information.
- **Substantial public interest** (UK GDPR Article 9(2)(g)) - we rely on the 'equality of opportunity or treatment', 'safeguarding of children and individuals at risk' and 'safeguarding of economic well-being of certain individuals' conditions from Schedule 1 of the Data Protection Act 2018.

## Who we may share your information with

We may need to share the personal information you have given to us or we've collected about you with partner organisations where relevant to the individual and/or their care provision. These include but are not limited to:

## Customer Services Privacy Notice

- Relevant Worcestershire County Council services
- Worcestershire based District Councils
- NHS and health providers
- Third party providers of software solutions used to manage the Customer Services Contact Centre
- Police

Information will only ever be shared when it is strictly necessary to help us provide effective services and you may have the right to refuse. We will not pass it onto any other parties unless required to do so by law or in all reasonable circumstances the disclosure is fair and warranted for the purposes of processing or subject to a data protection exemption.

We have specific data sharing agreements in place with local agencies and sometimes the law requires that we may have to pass your details on to a third party, for example, to prevent crime.

## How long we will hold your information

The standard retention for an audio recording of your telephone call is 1 year after the call takes place. More information about our retention periods can be found in our [Disposal Schedule](#).

Please note stated retention periods may be subject to any legal holds imposed under the Inquiries Act 2005 that may concern the information and override standard retention periods.

## Your information rights

You are entitled to a copy, or a description, of the personal data we hold that relates to you, subject to lawful restrictions. Please go to our [Make a Data Protection Request webpage](#) to find out how to make a request.

You may be entitled to rectification, restriction, objection, and erasure of your personal information depending on the service and legal basis. Please in the first instance contact [dataprotection@worcestershire.gov.uk](mailto:dataprotection@worcestershire.gov.uk) to exercise these Information Rights or call the main Worcestershire County Council contact telephone number of **01905 765765**.

Please see our overarching Privacy Notice (<http://www.worcestershire.gov.uk/privacy>) for further contact details and if you have a complaint about your information rights.