

Call Recording Policy (Version 1, May 2019)

1.0 Purpose of policy

- 1.1 As the general Call Recording Policy of the Karbon Homes Group, this document outlines the reasons for which recorded telephone conversations will be accessed, to whom access will be given as well as detailing the responsibilities for colleagues when managing recordings and their responsibilities in accordance with the General Data Protection Regulation (EU) 2016/679, Data Protection Act 2018 and other relevant Data Protection Legislation.

2.0 Objectives

- 2.1 Calls made to and from the Customer Relationship Team, internally and externally, will be recorded. The purpose of call recording is to provide an exact record of a telephone conversation into the Customer Relationship Team which can:
- Help identify colleague training needs, improve performance and customer experience
 - Help protect colleagues from abusive or nuisance calls.
 - To provide assurance of the Group's quality standards and policy adherence
 - To support call levelling sessions and individual feedback, in line with continuous improvement.
 - To ensure that the Group complies with regulatory procedures and to provide evidence in the event of a regulatory investigation.
 - To establish the facts and provide evidence in the event of a dispute or complaint.
 - Ascertain and demonstrate that calls are accurately and efficiently transcribed onto the case management system.
 - A call recording may also be used as evidence in the event that a colleague's conduct is deemed unacceptable. In this situation, the recording would be made available to authorised & relevant persons in accordance with the Disciplinary Policy.
 - Demonstrate transparency.
 - Prevent or detect crime or safeguarding requirements

3.0 Policy detail

3.1 Access

Access to recordings will only be permitted by authorised persons in order to satisfy a clearly defined business need.

3.2 Authorised persons

Only colleagues with a genuine business need to manage and access recordings will be permitted to do so. This may include Team Leaders, Managers and support staff working directly with frontline telephony teams, Human Resources, Operational Development and other relevant colleagues within the business.

3.3 Notification of recording

Before commencing the telephone conversation, the caller will be notified that the call is being recorded and provided with a general overview of how the Group may use the recording.

Callers will be provided with details of how the call recording policy and privacy statement can be obtained.

For internal telephone calls, colleagues do not have to advise that the call is being recorded, however all colleagues should be aware that all calls may be recorded.

3.4 Personal data

Recordings of telephone conversations contain the personal data of both the caller and the employee and will be managed in such a way that the rights of both are protected in accordance with the Data Protection Act and other relevant Data Protection legislation.

3.5 Refusal of consent of recording

If a customer refuses consent for their telephone conversation to be recorded we must respect their right to refuse consent and arrange for deletion of the call recording. The customer will receive notification once this is complete.

3.6 Retention

Recordings will be deleted in accordance with the Document Retention and Disposal Schedule.

3.7 Right to access recordings

Any third party or customer request to access call recordings will be managed in accordance with the Subject Access Request procedure. In the event that a call is provided to fulfil a subject access request, the Group will as far as possible, redact any personal information which may identify individuals.

3.8 Storage

Recordings will be stored securely with access managed by authorised persons and referenced for ease of retrieval. Recordings are stored on Karbon Homes' servers, physically located in a secure data centre (ISO27001 standard). RBAC is in place for internal access to recordings.

4.0 Monitoring and Review

- 4.1 This document will be reviewed every 3 years unless there is a change in best practice, legislation or guidance.

5.0 Equality and Diversity

- 5.1 This policy is implemented in line with the Group's Equality and Diversity Policy and associated legislation. Consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.
- 5.2 This policy and associated documents are available in different languages and alternative formats where necessary.

6.0 Data Protection and Privacy

- 6.1 We have a clear policy on data protection and sharing data with other partners/outside agencies under the requirements of the General Data Protection Regulation (EU) 2016/679. This is clearly set out in our Data Protection policy which, along with its associated procedures, must be followed throughout the operation of this policy.