

## Call Recording Policy

Responsible Officer	Wendy Graham, AD Customer Experience
This policy is applicable to	Karbon Homes Group
Approved by	KMT
Date approved	29 <sup>th</sup> September 2022
Frequency of review	Every 5 years or if there is a significant change in legislation, regulation or guidance.
Date of next review	September 2027
Implementation date	29 <sup>th</sup> September 2022
Key related documents	Call Recording Procedure Data Protection Policy Data Retention and Disposal Procedure Document Retention and Disposal Schedule Subject Access Request Procedure Unacceptable Customer Behaviour Policy Verification Procedure
Sources of best practice or guidance used in developing this policy	<ul style="list-style-type: none"> <li>• Data Protection Act 2018</li> <li>• Information Commissioners Office</li> <li>• UK General Data Protection Regulation</li> </ul>

Version Control			
Version	1.1	Author of Policy	Jill Johnson, Data Protection Business Partner
Equality Impact Assessment	Initial	EIA Date:	12 <sup>th</sup> May 2023
Data Protection Impact Assessment (DPIA)	Initial/Full	DPIA Date:	

Document change history		
Version	Date	Changed sections
1.0	15/05/2015	New Policy
1.1	29/09/2022	Policy refresh: general refresh, responsibilities added

Consultation	
Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	NA
Union(s)	May 2019
Customers	NA
Human Resources / Organisation Development	NA
Health and Safety Working Group	NA

Data Protection	Throughout
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## Policy statement

During the course of its activities the Group will process personal data including the recording and storage of telephone conversations.

This recording is undertaken to improve customer experiences by demonstrating transparency and establishing facts in situations which in turn drive service improvement and increase external confidence in the Group.

The recordings will be processed lawfully in accordance with the Data Protection Act 2018 and other relevant Data Protection Legislation and will take into consideration the Rights of all data subjects involved.

## Risk policy is designed to control

### 4.2: Data Protection

This Policy seeks to outline the reasons why the Group records calls and how those call recordings will be managed including retention, deletion on request and access.

This will reduce the reputational and financial risks faced by the Group due to the lack of protection of Personal Data processed in the course of its business.

This constitutes a significant financial and reputational risk.

## Key performance measures

- Internal quality assurance in relation to call handling
- Proper handling of Personal Data in accordance with aforementioned policies, best practice or guidance

## Definitions

**Authorised Persons** - Employees of the group with a legitimate business reason to access recordings in order to fulfil their role.

**Consent (of the Data Subject)** - any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

**Data Subject** - a living person who's Personal Data is processed by a controller or processor. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their personal information.

**Personal Data** - any information relating to an identified individual (i.e. which makes such information personal to that individual), or any information relating to someone who could be identified based on a variety of identifiers such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, biometric, mental, economic, cultural or social identity of that natural person. Personal Data can be factual or an opinion about that person, their actions and behaviour.

**Processing** - any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## Abbreviations

The Group – The Karbon Homes Group

UK GDPR: UK General Data Protection Regulation

## 1.0 Purpose of policy

1.1 As the general Call Recording Policy of the Group, this document outlines:

- for what reasons recordings can be accessed;
- who will be able to access the recordings;
- how long recordings will be retained; and
- under what circumstances the recordings can be shared externally.

## 2.0 Objectives

2.1 Internal and external telephone calls made to, or received by, the Group may be recorded.

Call recording is carried out for the purpose of creating an exact record of a telephone conversation which enables the Group to:

- establish facts;
- demonstrate transparency;

- ascertain and demonstrate that calls are accurately and efficiently transcribed onto appropriate systems;
- identify training needs and enable individual colleague feedback;
- improve performance and the customer experience;
- help protect colleagues from abusive or nuisance calls;
- establish and evidence if contractual, statutory, regulatory or policy breaches have occurred;
- prevent or detect crime or safeguarding requirements;
- provide assurance of the Group's quality standards and policy adherence; and
- ensure that the Group complies with regulatory procedures and to provide evidence in the event of a regulatory investigation.

### **3.0 Policy detail**

#### **3.1 Access**

Access to recordings will only be permitted by authorised persons 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, Data Protection, Human Resources, Operational Development and other relevant colleagues within the business.

#### **3.3 Business needs**

For a colleague to be permitted access to a recording a genuine business need must be established, examples of genuine business needs include:

- investigating anomalies in reporting or standards of work;
- enabling the identification of training needs and aiding individual colleague feedback;
- investigating claims of inappropriate, abusive, or nuisance calls or behaviour or the pursuance of a complaint or dispute;
- establishing and gaining evidence of a contractual, statutory, regulatory or policy breach;
- Sharing of best practice and in creating learning and development materials;
- the prevention or detention of a crime or safeguarding issue; and
- facilitating a data subject in applying a Right under data protection legislation.

#### **3.4 Notification of recording**

- Third parties contacting the Group through the customer service phone number will be played a message notifying them of how and for what purposes the personal data they provide during the call may be used as well as the location of the privacy statement for further information.

- If a colleague is contacting or being contacted on a phone number that will record the call outside of the customer services environment, they will ensure that the third party is aware of the recording before any personal data is shared.
- For internal telephone calls, colleagues do not have to advise that the call is being recorded.
- All colleagues should be aware that all calls may be recorded. This will be the case where any team who records their calls makes a live transfer of a call to another colleague, then this call will continue to be recorded

### 3.5 **Personal data**

Recordings of telephone conversations contain the personal data of both the caller and the colleague 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.

### 3.6 **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.

### 3.7 **Responsibilities**

The following are the general responsibilities of colleagues within the Group:

- It is the responsibility of all colleagues to ensure that callers are aware of when a call may be being recorded.
- It is the responsibility of 'Authorised Persons' to ensure that a genuine business need exists before they access a recording.
- It is the responsibility of the Data Protection Business Partner to manage Right requests for recordings under data protection legislation as well as requests from other third parties including the Police.
- It is the responsibility of the Assistant Director ICT and Digital Transformation to ensure that adequate security is in place on electronic systems.
- It is the responsibility of the Assistant Director People and OD to manage disciplinary actions relating to colleagues.

### 3.8 **Retention**

Recordings will be deleted in accordance with the Document Retention and Disposal Schedule, further information on this can be found in the Data Retention and Disposal procedure.

### 3.9 **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. If a call is provided to fulfil this request, the Group will as far as possible, redact any personal information which may identify individuals.

## 3.10 Storage

Recordings will be stored securely with access managed by authorised persons and referenced for ease of retrieval.

## 4.0 Monitoring and Review

All colleagues must observe this Policy and the Data Protection Business Partner has overall responsibility for the Policy and they will monitor it regularly in collaboration with the Assistant Company Secretary to ensure that it is being adhered to.

The Policy will be reviewed every 3 years or if there is a significant change in legislation, guidance or best practice.

## 5.0 Equality and Diversity

This policy is applied in line with Karbon's Equality and Diversity Policy and the associated legislation including the Public Sector Equality Duty and Equality Act 2010. At Karbon we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

However, we like to go even further. Beyond these protected characteristics we also take into consideration additional factors such as socio-economic status and language barriers which may also play a part. Our vision is for everyone to be treated fairly, have equality of opportunities, freedom, respect and access to our services.

To help us achieve this, we will work to improve accessibility for all, offering reasonable adjustments, adaptations and discussing ways that we can work to remove any barriers. A reasonable adjustment involves making a change to the way that we usually do things.

All of our customer policies and key information are made available on the Karbon Homes website. Reasonable adjustments that can help for example to make our information and services more accessible are sign language and language interpreters. We will work to improve accessibility for everybody that we deal with offering reasonable adjustments, adaptations and discussing ways that we can work to remove barriers that you may experience. A reasonable adjustment involves making a change to the way that we usually do things.

We work together to look at options and agree what adjustments would be reasonable in your individual circumstances. If you would like to find out more please get in touch with the team.

## 6.0 Data Protection and Privacy

Call Recording Policy

Version: 1.1

Date: 29<sup>th</sup> September 2022



We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Homes Group which, along with its associated procedures, must be followed throughout the operation of this policy.