



Telephone Call Recording Guidelines

1. Purpose

Sandbourne use call recording for information and training purposes, to maintain and improve the quality of customer service.

2. Call recording and storage

2.1 We will comply with the requirements of the legislation that applies to the recording of calls. Recordings will be treated confidentially and used, stored and disposed of in accordance with the requirements of the:

- Data Protection Act 2018 and General Data Protections Regulations (GDPR)
- Regulation of Investigatory Powers Act (RIPA) 2016
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBP Regulations)
- Telecommunications (Data Protection and Privacy) Regulations 1999.
- Statute of Limitations for Professional Indemnity Claims (three years).

2.2 Calls recorded:

All calls made from and to our registered office telephone system will be recorded.

2.3 Calls will be stored on line for one month and will be retrievable from back-up for up to three years.

2.4 The following steps have been taken to advise callers that their calls are being recorded for information and training purposes:

- All letters carry the advice in the footer.
- All compliment slips carry the advice in them.
- All answer phone messages to the registered office number inform callers.
- All residents were initially advised in Edition 3 (September 2014) of the residents' newsletter and reminders have been published in subsequent editions.
- A notice is published on our website.

2.5 It is the responsibility of staff to remind callers that the call is being recorded and to get their explicit consent to continue the call if sensitive personal

information is being discussed. Any call recording may be subject to a Data Protection Subject Access Request and claims for professional liability.

- 2.6 Although we do not currently take payments over the phone, it should be noted that PCI DSS regulations prevent us recording the security code off the back of a card. If this should change in the future, either relevant software will be added that allows us to stop recording when the security number is given, or the card payment taken only on an unrecorded line.
- 2.7 All staff will be informed of call recording at induction and regularly reminded.

3. Recording usage:

3.1 The use of telephone call recordings may include:

- Training purposes
- Proof of information and advice given to customers
- Proof of instructions to contractors/suppliers
- Evidence of abusive or offensive calls to staff
- Evidence during investigations of misconduct or complaints made against staff.

3.2 Call recordings will be made available to authorised managers for training purposes and investigations.

These Sandbourne Housing Association guidelines should be read in conjunction with the 'Call Recording Legal Requirements Guidance' (Armstrong-Bell-Call-Recording-Legal-Requirements-Guidance-2011-09 attached).

Version 4: 27 November 2019
Review: November 2022