

DPO-07 -Telephone Call Recording Policy

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Document Information

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1.0	18/05/18	Tim Smith	Compliance Folder

Version History

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2.0	15.10.2018	Tim Smith	Removal of recording notification

Distribution History

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1.0	18/05/18	Julie Davidson, Julie Wright, Ian Northmore, Andrew Gratton, Ops Exec

Approval History

Version	Date	Review Date	Approved By
1.0	21/5/18	21/05/19	Morgan Atherton

Introduction

MWUK Limited, trading as Alexandra and Dimensions, has a telephone system in that is capable of recording conversations. This is a standard industry practice that allows the recording of telephone calls for the fulfilment of our contractual obligations, for quality monitoring, training, compliance and security purposes.

In-bound and Outbound calls received into Customer Services and Credit Control may be recorded and retained in accordance with defined retention periods. These recordings will only be used for the purposes specified in this policy. If calls are transferred from Customer Services or Credit Control to a member of staff outside of these departments, the call recording will cease once the call is successfully transferred.

Purpose of Recording Telephone Calls and Scope of Policy

In order to maintain our high standards of service and protect Customers and staff we need to record telephone calls addressed by Customer Services Centre and Credit Control Department and retain them for a limited period of time.

We shall ensure that the use of recordings is fair and lawful and will comply with all the relevant data protection regulations.

Under normal circumstances a call will not be retrieved or monitored unless:

- 1) It is necessary to investigate a complaint
- 2) It is part of a management 'spot check' that customer service quality standards are being met through Call Evaluations
- 3) For the prevention or detection of crime
- 4) It is necessary to check compliance with policies and procedures
- 5) It will aid standards in the call handling though use in training and coaching of our staff
- 6) Any other purpose will be considered on a case by case basis by the Data Privacy Manager.

If it becomes clear that the Customer making the call do not wish to have their call recorded the advisor dealing with the call will provide the Customer

with alternative means of communication such as email and postal address and the call recording will be stopped and call terminated.

What type of Information will be collected?

Personal data collected in the course of recording activities will be processed fairly and lawfully. It will be:

- Adequate, relevant and not excessive. Data collected may include but is not limited to: Name, Address, Job Title, Telephone Number, Email Address and Gender.
- All calls, where the caller provides details of a payment card for the purpose of making a payment, will only be partially recorded. In order to comply with Payment Card Industry Security Standards (PCI DSS), all operators will suppress call recordings whilst financial information is disclosed thus ensuring that no financial information is recorded.
- All calls, where the caller provides other special category of personal information will only be partially recorded. All operators will suppress call recordings whilst information is disclosed thus ensuring that no special category of personal information is recorded.
- Used for the purposes stated in this policy only and not used for any other purpose
- Accessible only to managerial staff after securing permissions through authorised channels
- Treated confidentially
- Stored securely
- Not kept for longer than necessary and will be securely destroyed once issues in question have been resolved.

Access to Call Recordings and Playbacks

Access call recordings will only be granted to:

- Staff members personally involved in the call recording. A request to access to the recording must be made to a supervisor in Customer Services Centre.
- Supervisors in Customer Services Centre and Credit Control Team. They will listen to recordings to provide feedback and coaching in line with the Call Evaluation or where a Customer or Staff Member highlights a complaint.
- Senior Management and HR staff on a case by case basis.

Storage, Retention and Destruction of Call Recordings

All call recordings are made using 3rd Party telephone system and stored in storage devices managed by our internal IT Department.

All call recordings are automatically deleted within one year, unless:

- 1) The call recording forms part of a complaint. In this case the call recording will be kept until the complaint is closed and the expiry date for appeals expires.
- 2) The call recording is identified as a valuable training tool. In this case the call recording will be kept until the training is complete.
- 3) There is a legal requirement to keep the call recording, for example when used as evidence of a crime. In this case the call recording will be kept until the legal obligation expires.
- 4) There is a contractual obligation to keep the recording. In this case the recording will be kept until the contractual obligation expires.