

Call Recording Policy

1 Our approach to telephone call recording

- 1.1 Octavia Housing has a telephone system that is capable of recording conversations for the purpose of compliance, security, training and quality purposes. Calls will be recorded under the guidelines set out in this Policy.
- 1.2 Calls received into and out of the Customer Contact Team, may be recorded by Octavia Housing and will be retained for a period of four weeks.

2. Scope

- 2.1 This policy applies to staff, residents, bank staff, and contractors.

3 Policy Purpose

- 3.1 Under normal circumstances the purpose of recording telephone calls may include:
 - Training and coaching staff
 - Evidence during misconduct or complaints made against staff
 - Management 'spot check' that customer service standards are being met
 - Proof of information and advice given to customers
 - Evidence of abusive calls to staff
 - There is a threat to the health and safety of staff or visitors
 - For the prevention or detection of crime
 - To comply with industry standards and regulatory procedures

4. Call recording and storage legislation

- 4.1 Octavia will only collect and process personal data if one or more of the conditions set out in Article 6 of the GDPR have been satisfied.
- 4.2 References to GDPR in this Policy means the GDPR as supplemented and varied by the Data Protection Act 2018.

The relevant conditions for Octavia's activities are:

- processing is necessary for the purposes of the legitimate interests pursued by Octavia or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the tenant or employee which require protection of personal data, in particular where the data subject is a child
- 4.3 We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant 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
- General Data Protection Regulations (GDPR)
- The Employment Practices, Data Protection Code
- Regulation of Investigatory Powers Act 2000 (RIPA)
- The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBP Regulations)
- The Telecommunications (Data Protection and Privacy) Regulations 1999
- The Human Rights Act 1998

5. Calls recorded

- 5.1 Calls received into and out of the Customer Contact Team may be recorded by Octavia Housing. Octavia's registered office contact telephone number is 0208 354 5500.
- 5.2 Once a call is fully transferred from the Customer Contact Team to a specialist (back office) team, the recording with the caller will cease.
- 5.3 Calls will be stored for 4 weeks and will be retrievable.
- 5.4 The following reasonable efforts have been taken to advise callers that their calls are being recorded for information, training and quality purposes:
- A notice is published on our websites with a link to our Policy
 - Customers are informed at the beginning of the call received into our registered office
 - Residents to be advised in our resident newsletter
 - An email sent to staff to inform them that calls are being recorded.
 - A copy of the Policy will be made available to all staff
- 5.5 All staff will be informed of call recording at induction and regularly reminded.
- 5.6 If and when sensitive personal information is being discussed, 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. Any call recording may be subject to a Data Protection Subject Access Request and claims for professional liability.
- 5.7 Personal information especially special categories personal information, about employees and residents is shared only with staff who need to know the information in order to carry out their legitimate duties. This may involve sharing information between individuals in different departments. Where appropriate, Octavia sets up protocols to clarify how this operates in practice to ensure that only those people who have a need to know are able to access personal data of employees or residents.

6. Payments

- 6.1 We 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. Staff are required to ensure that recording is stopped when the security number is given, or when the card payment is taken. This conversation continues on an unrecorded line.
- 6.2 All staff are informed that they are not to write down any payment card details on any paper, book or form when taking payments over the phone. This is part of complying with PCI DSS regulations and is deemed a serious matter if any staff member fails to comply.

7 What you can expect from our service

- 7.1 Personal data collected (“processed”) in the course of recording activities will be processed fairly and lawfully in accordance with the Data Protection Act 2018. It will be:
- Adequate, relevant and not excessive
 - Used for the purpose(s) stated in this policy and not used for any other purposes
 - Accessible only to authorised managers for training purposes and investigations
 - Treated confidentially
 - Stored securely; and
 - Not kept for longer than necessary

8 Where to find a copy of this policy

- 8.1 This policy will be available to all internal staff, residents and external stakeholders and will be on Octavia’s websites: www.octavia.org.uk, www.octaviahousing.org.uk, www.octavialiving.org.uk, www.octaviafoundation.org.uk, www.octaviasupport.org.uk

9 Policy Review

- 9.1 This policy will be managed and reviewed every two years and, from time to time, updates and re-issues will be circulated. However, the policy will be reviewed sooner if a weakness in the policy is highlighted, in the case of new risks, and/or changes in legislation.

Policy Owner: Kim Parkins – Customer Contact Manager, Title: Voice Recording Policy Approval date: [December 2016]. Last updated: [July 2018].