

# Leathermarket JMB Call Recording Policy

## Amendment record

Page no	Revisions made in version:	Date

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## 1.0 POLICY STATEMENT

Leathermarket JMB will use call recording for information and training purposes, helping us to maintain and improve the quality of customer service by allowing us to:

- Clarify the content of particular conversations and the quality of information provided to callers;
- Ensure that calls are being handled correctly and identify training requirements;
- Collect evidence of abusive, aggressive, or threatening behaviour and take action to protect our employees;
- Collect evidence for the swift resolution of complaints;
- Use recordings to identify organisational learning.

## 2.0 AIMS AND OBJECTIVES

- To outline our approach to call recording
- To ensure that our call recording processes are compliant with the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR).

## 3.0 USE OF CALL RECORDING

3.1 Call recording will be used for the following purposes:

- To help identify training needs and improve team performance
- To help protect staff from abusive calls
- To assist in complaint resolution
- To assist in quality control via occasional 'spot checks'
- To assist in customer demand analysis

3.2 Call recording may be used in incoming and outgoing calls received, made, or transferred by:

- Resident Services Team
- Responsive Repairs Team
- Reception

3.3 Call recording will stop when:

- A call is transferred to a senior staff member or members of the Human Resources Team.

## 4.0 RECORDING OF CALLS

4.1 Calls originating inside and outside of the organisation may be recorded by the JMB.

4.2 Calls will be stored for 90 days and will be retrievable by managers who have authorisation.

4.3 The following reasonable efforts will be taken to advise callers that their calls are being recorded:

- Notice on our website with a link to this policy
- Callers informed at the beginning of calls

Issue date: 03/02/2025	Version number: 1.0
Review date: 03/02/2028	Page: 2

- Residents advised in our resident newsletter
- An email sent to staff to inform them that calls are being recorded
- Discussion in staff meetings

4.4 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.

## 5.0 PROCESSING AND STORAGE OF DATA

5.1 The JMB will only collect and process personal data if one or more conditions set out in Article 6 of the GDPR (as supplemented and varied by the DPA 2018) have been satisfied. The relevant conditions are:

processing is necessary for the purposes of the legitimate interests pursued by the JMB or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the individual which require protection of personal data, in particular where the data subject is a child.

5.2 Recordings will be treated confidentially and used, stored, and disposed of in accordance with the requirements of:

- 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

5.3 Personal data collected (processed) in the course of recording activities will be processed fairly and lawfully in accordance with relevant data legislation. It will be:

- Adequate, relevant and not excessive
- Used for the purposes stated in this policy
- Accessible only to authorised managers for training purposes and investigations
- Treated confidentially
- Stored securely;
- Not kept for longer than necessary.

Issue date: 03/02/2025	Version number: 1.0
Review date: 03/02/2028	Page: 3