



Call Recording Policy

Policy Purpose:

The purpose of this policy is to govern the procedures for telephone call recording within EvaStore Ltd (the Company), and the management of access to, and use of, the recordings. The policy aims to minimise intrusion by restricting the recording of calls, the access to, and use of these recordings to limited and specific purposes.

Legislation:

The recording and monitoring of telephone calls is affected by several items of legislation, in particular:

- Human Rights Act 1998
- Data Protection Act 2018 (GDPR)
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBP Regulations)
- Telecommunications (Data Protection and Privacy) Regulations 1999
- Payment Card Industry Data Security Standards (PCI DSS)
- ICO Employment Practices Code

Recording Information:

The EvaStore Ltd telephony system is capable of recording calls using the 3 CX telephone system.

To comply with Payment Card Industry Security Standards (PCI DSS) payments can **ONLY** be taken over the phone once call reporting has been suspended. Call suspending is restricted to the Main Accounts number so payments can **ONLY** be taken on that extension.

Purpose of Call Recordings:

Calls are recorded and retained for the following purposes:

- To monitor the quality of call handling and customer service and to ensure the information we provide is consistent and accurate.
- Staff training, coaching and support
- To verify what was discussed within the call should a dispute or complaint arise
- To protect staff from abusive behaviour
- To verify the customers agreement during certain service requests

- Calls may also be used as evidence within an investigation should a misconduct, performance, or capability concern arise.
- To verify the details of the call for the purposes of, or in connection with, any legal proceedings

Retention and Storage of Call Recordings:

All call recordings will be retained for a period of 6 months on the 3CX telephone system. This system is also BS10008 compliant in addition to ISO27001. All recordings will be deleted after 6 months, unless retained for a specific business purpose.

Access to Call Recordings:

Access to call recordings are controlled in line with principles under Data Protection legislation and is limited to the Managing Director & General Manager. Should any other employees of EvaStore Ltd require access to call recordings, written permission to access must be granted by either of the above, and for non-employees' permission to access must be requested via a Subject Access Request.

Specific call recordings may be accessed by Line Managers. In these cases, requests for access must be made in writing for authorisation from either of the above.

In the case of a request from an external body with law enforcement powers in connection with the prevention, detection, or investigation of crime e.g., the Police, Home Office, DWP, HMRC etc. the request must be made in writing to the Managing Director who will consider the request.

The UK Data Protection legislation allows persons access to information that we hold about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way to enable the General Data Protection Regulations Representative to retrieve information relating to one or more individuals as easily as possible.

Any unauthorised access of call recordings may lead to disciplinary action. Browsing of recordings for no valid reason is not permitted.

Advising of the Call Recording Facility:

EvaStore Ltd will make every reasonable effort to communicate that calls will be recorded. This will be done by:

- Employee's informing the caller when call recording facilities are being used
- Using a recorded message with the auto attendant facility to inform callers that their call is being recorded

- Reminding the caller that the call is being recorded should they be displaying abusive behaviour and that the calls contents may be reviewed by management
- The Call Recording policy being published on the EvaStore Ltd website.