



2Roost LLP Call Recording Policy

1 General Principles

The General Data Protection Regulation (GDPR) protects personal information held by organisations on computer and relevant filing systems. It enforces a set of standards for the processing of such information. In general terms it provides that all data shall be used for specific purposes only and not used or disclosed in any way incompatible with these purposes.

In the course of its activities the company will collect, store and process personal data, including the recording of all telephone calls, and it recognises that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

The company is registered with the Information Commissioner for all necessary activities under the GDPR.

(For further information relating to Data Protection information GDPR please refer to the 2Roost Privacy Policy on <https://www.2roost.co.uk/privacy-policy/>)

2 Call Recording Overview

Purposes of call recording

The purpose of call recording is to provide an exact record of the call which can:

- Help identify 2Roost' staff training needs;
- Help improve 2Roost' staff performance;
- Help protect 2Roost' staff from abusive or nuisance calls;
- Establish the facts in the event of a complaint either by a customer or a member of staff and so assist in resolving it;
- Assist in quality control to identify any issues in processes, with a view to improving them through one to one call feedback sessions.
- A call recording may also be used as evidence in the event that an employee's telephone conduct is deemed unacceptable. In this situation the recording will be made available to the employee's manager, to be investigated as per the 2Roost Disciplinary Policy.

The telephone call recording system in operation will record incoming and outgoing telephone calls and recordings may be used to investigate compliance with the companies Quality Standards, to

provide further training, to support the investigation of complaints, to ensure that 2Roost complies with regulatory procedures and to provide evidence for any regulatory investigation.

2Roost will record telephone conversations from its central telephone system. All call recordings are stored on the call recording server.

2Roost currently does not record the content of any telephone conversations outside of this operating system, telephone conversations made to and from work provided mobile telephones, nor calls initiated as internal calls between extension users.

3 Communicating the Call Recording System

2Roost will make every reasonable effort to communicate that calls will be recorded. This will be done by:

- Publishing this policy on the company's website site: <https://www.2roost.co.uk/privacy-policy/>
- Informing all clients in the first instance via a recorded announcement for Incoming calls. Outbound calls where no automated announcement exists the advisor will read a script to inform the prospective client that calls made to and from the business will be recorded for training and monitoring purposes.

4 Procedures for managing and releasing call recordings

1. The recordings shall be stored securely, with access to the recordings controlled and managed by the Data Controller or any other persons authorised to do so by the Data Controller.

2. Access to the recordings is only allowed to satisfy a clearly defined business need and reasons for requesting access must be formally authorised only by a relevant Director / Head of Department. All requests for call recordings should include the following:

- The valid reason for the request.
 - Date and time of the call if known.
 - Telephone extension used to make/receive the call.
 - External number involved if known.
 - Where possible, the names of all parties to the telephone call.
 - Any other information on the nature of the call.
3. The browsing of recordings for no valid reason is not permitted.

4. GDPR 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 Data Controller to retrieve information relating to one or more individuals as easily as possible.

5. Requests for copies of telephone conversations made as Subject Access Requests under the GDPR must be notified in writing to the Data Controller immediately and, subject to assessment, he/she will request the call recording and arrange for the individual concerned to have access to hear the recording or obtain a Transcript.

6. In the case of a request from an external body in connection with the detection or prevention of crime e.g. the Police, the request should be forwarded to the Data Controller who will complete the request for a call recording.

7. Requests for copies of telephone conversations as part of staff disciplinary processes will only be released with the written agreement of the Data Controller, or any other person authorised by the Data Controller, who will consult with the Data Controller before approval is granted.

8. Recordings of calls will be encrypted and stored electronically in a secure environment. Call recordings will be deleted from servers after 21 days in all cases.

9. 2Roost LLP use BT cloud software to record all inbound and outbound calls. The software provides secure user password protected logon access control. Recordings can be quickly located using multiple search criteria to ensure GDPR requirements for Right to Access, Right to be Forgotten and Data Portability can be complied with.

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If you have any questions, comments or requests regarding this Call Recording Policy, please feel free to contact us by writing to us at 2Roost UK LLP, 27 Main Street Sheffield S26 4TZ or email us on info@2roost.co.uk