

Call Recording Policy

Introduction

Monarch Water Limited has a telephone system that is capable of recording conversations. Like many other organisations, this is standard practice that allows the recording of telephone calls for quality monitoring, training, compliance and security purposes.

All calls received into Monarch Water will be recorded and will be retained for a period of 12 months after which they will be deleted unless retained for the purposes specified in this policy.

Recordings will only be used for the purposes specified in this policy. There is a recorded message in place to inform callers that their call is being recorded for quality, monitoring and training purposes so that they have the opportunity to consent by continuing with the call or hanging up.

Purpose of this telephone recording policy

In order to maintain high standards and protect the public and staff we need to record all telephone calls received into Monarch Water and retain them for a limited period of time.

We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant legislation. This includes;

- The Regulation of Investigatory Powers Act 2000
- The Telecommunications (Lawful Business Practice)(Interception of Communications Regulations) 2000
- The Telecommunications (Data Protection and Privacy) Regulations 1999
- The General Data Protection Regulation 2018
- The Data Protection Act 2018
- The Human Rights Act 1998

Scope of Policy

All calls made to Monarch Water will be recorded. Under normal circumstances a call will not be retrieved, monitored or retained longer than 12 months unless;

- It is necessary to help protect employees from abusive or nuisance calls
- It helps establish the facts in the event of a complaint, either by a customer or a member of staff and so assist in resolving it.
- To help identify employee training needs and to support training new and existing members of staff
- To assist in quality control to identify any issues in Monarch Water's processes, with a view to improving them.
- To provide evidence for the prevention or detection of crime

If it becomes clear that a communication is private and the person making the call says that they do not wish to have their call recorded, the call recording will be stopped.

Collection Information

Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with data protection law. It will be;

- Adequate, relevant and not excessive

- Used to the purpose(s) stated in this policy only and not used for any other purpose.
- Accessible only to authorised Monarch Water employees
- Treated confidentially
- Stored securely
- Not kept for longer than necessary and will be securely destroyed when it is no longer required.
- Not passed to any third parties unless they have a legal right to it (for example the Police) or there is a legitimate business need to do (for example in defence of an allegations against Monarch Water or our employee)

Calls where the caller provides details of a payment card for the purpose of making a payment to Monarch Water will only be recorded in-part to comply with Payment Card Industry Security Standards (PCiDSS).

Advising callers that calls are being monitored/recorded

There is a recorded message in place to inform callers that their call is being recorded for quality/monitoring and training purposes so that they have the opportunity to consent by continuing with the call or hanging up.

How can I contact Monarch Water in the event I do not want to be recorded?

In the event that you do not wish for your call to Monarch Water to be recorded, we recommend that you contact us by alternative means such as email and/or mail.

Procedures for managing, releasing and deleting call recordings

1. The recordings shall be stored securely, with access to the recordings controlled and managed by authorised personnel only.
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. The 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 authorised personnel 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 info@monarchwater.co.uk 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.

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 info@monarchwater.co.uk 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 Managing Director, or any other person authorised by the Managing Director, who will consult with the Managing Director before approval is granted.
8. Under GDPR you have the right to request a copy of your calls, and to request that your calls be deleted if you believe we are keeping it for longer than necessary. These requests should be directed to info@monarchwater.co.uk.