



**Royal
Osteoporosis
Society**

Better bone health for everybody

Call Recording Policy

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Audience: General public

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theros.org.uk

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1. Introduction

The Royal Osteoporosis Society has a telephone system capable of recording conversations. Like many other organisations, this is a standard practice that allows the recording of telephone calls for quality monitoring, training, compliance and safeguarding purposes.

All calls received into the Helpline, Supporter Development Team and General Enquiries teams will be recorded and will be retained as per our Data Retention Schedule found in our Data Protection Policy. These recordings will only be used for the purposes specified in this policy.

This Call Recording Policy should be read in conjunction with the suite of Data Protection Policies.

The call recording facility is automated and accommodates incoming calls received from outside the Charity and external calls being made by a member of staff. If calls are transferred to a team that does not have call recording on their lines, the call recording will cease to act once the call is successfully transferred, but will continue if it is transferred to any of the teams identified above. If the call comes in to a non-call recorded line and then is transferred to one that is, the staff member should notify the caller that their call will be recorded.

There is a recorded message in place to inform callers that their call is being recorded. All callers are also informed that they can choose to opt-out of call recording, in order to do this, they will need to notify the call handler, who will then ring them back on a line where there is no recording.

2. Purpose of this call recording policy

In order to maintain high standards and protect the public and staff we need to record all telephone calls received into the Helpline, Supporter Development and General Enquiries teams 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 Data Protection Act 2018;
- The European General Data Protection Regulation (GDPR);
- The Human Rights Act 1998;
- The Regulation of Investigatory Powers Act 2000;
- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- Privacy and Electronic Communications Regulations 2003

2. Scope of policy

All calls made to the Helpline, Supporter Development and General Enquiries teams will be recorded. Under normal circumstances a call will not be retrieved or monitored unless:

- It is necessary to investigate a complaint;
- It is part of a management 'spot check' that our standards are being met;
- Provides assurance of the charity's quality standards and policies
- There is a threat to the health and safety of staff or visitors or for the prevention or detection of crime;
- It is necessary to check compliance with regulatory procedures; or
- It will aid standards in call handling through use in training and coaching our staff.
- It is for safeguarding purposes (see Safeguarding Policy for further information).

3. Collecting information

Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with the current Data Protection Act 2018 and the European General Data Protection Regulation and the Care Act 2014. It will be:

- Adequate, relevant and not excessive
- Used for the purpose(s) stated in this policy only and not used for any other purposes;
- Sent externally only when needing to report a safeguarding concern to a local authority
- Accessible only to managerial staff after securing permission from the Head of Corporate Governance or designated Safeguarding Lead;
- Treated confidentially;
- Stored securely; and
- Not kept for longer than necessary and will be securely destroyed once the issue(s) in question have been resolved.

We rely on the legal basis of legitimate interest in order to record calls, this means that we have identified that there is sufficient benefit to the caller for us to record the personal data given to us. We give the individual control over how their information is used by offering them an opt-out and signposting to further detail of how we use their information on our website (also available by post or over the phone).

4. Advising callers that calls are being monitored/recorded

Where call recording facilities are being used we will inform the caller that their call is being monitored/recorded for quality / training purposes so that they have the opportunity to request that their call is not recorded.

There is a recorded message in place to inform callers that their call is being recorded.

We will publish our policy on our website.

5. Related policies

- Data Protection Policy
- Information Security Assurances Policies

- Disciplinary Policy
- Safeguarding Policy
- Privacy Policy

6. Procedures for managing and releasing call recordings

- The recordings shall be stored securely, with access to the recordings controlled and managed by the Data Protection Officer.
- Access to call recordings will be given to Managers, Heads of Service and Directors of those teams, as they will be assessing call quality etc.
- Individuals requesting access to their call recordings will be dealt with as a subject access requests. Please note that calls are retrievable only by the telephone number used and not by any other personal data contained within the call. Please refer to the Charity's Data Protection Policy for further information regarding Subject Access Requests.
- Browsing of recordings for no valid reason is not permitted.
- Every individual has the right to access the 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 Protection Officer to retrieve information relating to one or more individuals as easily as possible. Recordings of calls will be kept on file and periodically archived to external hard drives and stored in accordance with our Data Protection Policy.