



First on Scene Training **Telephone Call Recording Policy**

Purposes of call recording

First on Scene Training operates a call recording process. The purpose of doing this is to:

- Identify any staff training needs
- Improve the service provided by our staff
- Improve staff performance
- Help resolve customer complaints quickly and effectively
- Support any compliance investigation
- Provide protection to our staff in the event of abusive calls
- Assist the Police with criminal investigations
- Establish facts and provide evidence in the event of a legal dispute involving our products or services

Scope – what calls are recorded?

- A selection of external incoming calls to the business
- A selection of external outgoing calls from the business
- Transferred calls will continue to be recorded

Call recording will be switched off in the event of any payment card details being taken, in accordance with The Data Protection Act 2018. This will be indicated by two beeps. Two further beeps indicate that recording has resumed.

Anyone preferring not to have their call recorded may request such, and must clearly state their wishes at the beginning of the call. The switching off of the call recording system is then at the discretion of the staff member taking or receiving the call, and if the system is switched off this will be indicated by two beeps. If the staff member wishes to switch the call recording system back on, they must advise the caller of this. A further two beeps will indicate that the recording system has been switched back on.

If a member of staff does not wish to switch off the call recording after a request is made from the caller, they must state their reasoning for this. If the caller does not accept the explanation, the decision will be referred to the line manager, whose decision will be final. Should the decision be made to continue with recording the phone call and this is not accepted by the caller, the caller must terminate the call.

Communication

First on Scene Training will make reasonable efforts to communicate that all calls will be recorded. This information will be available:

- Via the publication of this policy within the Privacy Policy on www.firstonscene.co.uk
- As a notice available on the website above, under the 'Contact Us' section
- As a disclaimer on every external email sent by a staff member



- As part of the company's welcome message on incoming calls

Storage of call recordings

The recorded calls will be stored for a maximum of three years on an encrypted system. The only exception to this will be in the unlikely event that a call needs to be retained as evidence for an unresolved issue or for use in a criminal investigation. In this instance, deletion of the call will be at the discretion of the line manager concerned and the business director.

All other calls over three years old will be deleted from the system.

The system can only be accessed by the IT Management and Support Team, and by the appropriate line manager and business director for the staff member who has made or received the call through a password protected system. This system cannot be accessed by other staff members, and line managers will not have access to call recordings from other teams.

If a call is to be used for training purposes, the call may be transferred to the internal secure cloud-based workspaces in order for the call to be played back and listened to by the line manager and the staff member/s of the relevant team. In such cases, the call will be kept securely on a password protected workspace and once finished with, deleted from the workspace immediately.

Browsing the recorded calls without valid business reason is illegal and anyone found to be doing so will be subject to disciplinary action.

Usage of call recordings

The call recording system is in place to ensure First on Scene Training is offering the best customer service possible. As such, line managers will regularly listen to a selected number of calls to ensure this service is being upheld, and they will be used to provide assessment and feedback to individual staff members.

Calls will also be used in individual and group training. In such cases, the call will be played back within a private setting and played only with permission from the member of staff party to the call.

In the event of a complaint or abusive call, the call in question will be retrieved and listened to by the relevant line manager to quickly establish the facts in order to resolve the issue.

A recording may also be investigated as part of a disciplinary process. The decision as to whether the recording is used as evidence during the process will be made at the discretion of the line manager or business director.

If requested by a legitimate legal body, the recording may be used to support a criminal investigation.

In the event of a legal dispute or regulatory issue involving the company, its products or services, any related calls may be used to establish fact and provide evidence where required.

Caller Requests



Under The Data Protection Act 2018, individuals have a range of rights in relation to the personal data held relating to them and the right to make Subject Access Requests to obtain copies of such data. A copy of any phone conversation may be requested by any individual who has been recorded, the Police or other legal authorities. Such requests must be made in writing to the Data Protection Officer of First on Scene Training (either by e-mail to thedpo@firstonscene.co.uk or in writing to **4 Willow House, 4 Willow Avenue, Bradford, BD2 1LS**) with the following information included:

- A valid reason for the request
- Date and approximate time of the call
- Telephone number the call was made to or received from
- Names of all staff members party to the call
- A brief outline as to the content of the call

If any of the above information cannot be provided, First on Scene Training will still attempt to locate the call. All necessary steps will be taken to prove the caller requesting the information is the same as the caller on the recording.

Providing the call is still retained by First on Scene Training it will be retrieved and sent securely to the caller as an audio file, or arrangements will be made for the caller to visit the offices and listen to the call in a private setting.