



CALL RECORDING POLICY

This document can be made available , on request, in other formats such as larger print, audio-format, Braille and in other languages, as appropriate.

Adopted: March 2025

Last Reviewed: March 2026

Next Review Due: March -2028



1. Purpose

This policy outlines the procedures and legal considerations for recording external telephone calls made to and from Oak Tree Housing Association. It ensures compliance with applicable data protection laws and promotes transparency with customers.

2. Scope

This policy applies to all staff members making or receiving telephone calls on behalf of Oak Tree Housing Association where calls may be recorded.

3. Legal Basis

Calls are recorded in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The processing is being carried out under the legal basis of legitimate interest and includes :

- Quality assurance and training (enhanced customer service)
- Fulfilling contractual obligations
- Complying with regulatory requirements
- Investigating complaints or disputes (dispute resolution)

4. Notification to Customers

Customers will be informed at the start of an outbound call that the call is being recorded and for what purpose.

Example Script:

"Hello, this is [Name] calling from Oak Tree Housing Association. Please note all calls are recorded for quality assurance and training purposes."

5. Storage and Retention

Call recordings will be securely stored in accordance with our data protection and retention policies. Recordings will be retained for a maximum of 4 weeks unless required longer for legal or compliance purposes.

6. Access and Disclosure

Access to call recordings is limited to authorised personnel. Customers may request access to recordings involving them via a subject access request (SAR).



7. Staff Responsibilities

All staff are responsible for ensuring customers are informed appropriately and for managing call recordings in line with this policy. Training will be provided to ensure compliance.

Outbound Call Handling Guide – Call Recording

Step-by-Step Guidance for Staff

Before the Call

- Ensure your recording system is active and compliant
- Familiarise yourself with the purpose for recording the call

Opening the Call – Script

“Hello, this is [Your Name] calling from Oak Tree Housing Association. Please note all calls are recorded for quality assurance and training purposes.”

If customer asks, "Why is the call being recorded?"

“We record calls to assist with service improvements, for staff training, and for better dispute resolution for the benefit of customers and tenants.”

If customer says they don't want to be recorded

- Explain the reasons we record and reassure OTHA processes all information in accordance with data protection legislation including the UK GDPR and the Data Protection Act 2018. Customers may refer to our Privacy Notice on the website for reassurance.
- If customer still does not want to be recorded, offer other ways to contact i.e via email to info@oaktreeha.org.uk; letter; calling to the office, making an appointment etc.

During the Call

- Avoid discussing unnecessary personal information
- Be professional, clear, and polite
- Adhere to Payment Card Industry procedures when taking payments (ensure call not recorded during payment process)
- Note any customer objections or preferences

After the Call

- Recordings will be automatically stored securely
- Log any data requests or objections, and report them to your Data Protection Lead (Kirsty Davis).