

Call Recording Policy

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1. Purpose

The purpose of this policy is to govern the procedures for telephone call recording within Student Awards Agency Scotland (SAAS) and the management of access to and use of the recordings.

The policy aims to minimise intrusion by restricting the recording of calls and the access to and use of these recordings to limited and specific purposes

2. Recorded Information

SAAS Contact Centre telephony system is capable of recording calls. All calls received into the Contact Centre are recorded. Calls made to the SAAS Counter Fraud Hotline may be recorded using the Mitel Telephony system.

Calls are not recorded in any other area of or system belonging to or managed by SAAS. Direct inward dialling calls, internal calls and calls forwarded from the Contact Centre are not recorded.

Any expansion of current scope will require a review of the Data Protection Impact Assessment (DPIA) and approval by Senior Information Risk Officer (SIRO) or Information Asset Owner (IAO).

Calls where the caller provides details of a payment card for the purposes of making payment to SAAS are not recorded to comply with Payment Card Industry Security Standards (PCI DSS).

3. Purpose of Call Recordings

Calls are recorded and retained for the following purposes:

- Staff training purposes, helping us to improve the quality of our customer services and to ensure the information we provide is consistent and accurate.
- To ensure we have an accurate record of the call, to support any customer transaction that takes place over the phone.
- Establishing the facts in the event of a complaint by a customer or member of staff and used in evidence during any associated investigation.
- For reporting on the types and numbers of enquiries received.
- Prevention or detection of crime, or for the investigation, apprehension or prosecution of offenders, where the offence concerned involves any unlawful claim for any payment out of, or any unlawful application of, public funds.
- For the purposes of, or in connection with, any legal proceedings (including prospective legal proceedings).

4. Advising Callers and Staff that calls are being monitored/recorded

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

- Informing the caller when call recording facilities are being used.
- In the Contact Centre a recorded message informs callers that their call is being recorded.
- For the Counter Fraud Hotline there is separate guidance that specifically includes the call handler formally cautioning the caller and advising them that the call is recorded.
- This policy is published on the SAAS website: www.saas.gov.uk
- The SAAS Counter Fraud Hotline Policy is published on the SAAS website: www.saas.gov.uk
- This policy is published on the SAAS intranet and staff are aware of the location of this policy.

5. Retention and Storage of Call Recordings

Contact Centre

Call recordings are held for six years from the date of receipt before being deleted. All recordings are held securely on SAAS' telephone system for 500 days before being archived to a secure internal server until deleted. This is in line with the SAAS retention schedule.

Fraud Hotline

Calls made to the Fraud hotline are reviewed for value in line with the Counter Fraud Hotline Policy and guidance. If calls are found to be of value to a fraud investigation an electronic copy is retained in the fraud investigation file, in line with the retention period for fraud case files. Otherwise calls are deleted in line with the fraud hotline policy. A physical copy may be produced as part of the evidence package if submitted to COPFS.

6. Security of Call Recordings

Access to call recordings are controlled in line with principles under Data Protection legislation and managed through IT Service Desk or the Counter Fraud Team with advice from SAAS Information Manager as required

The SAAS Information Manager oversees the processes, policy and procedures associated with all voice recording including auditing.

Access to the recording systems is limited to Contact Centre Managers and Supervisors; Complaints and Appeals Team; Counter Fraud Team; Information Management Team and IT Service Desk Team.

Any unauthorised access may lead to consideration of disciplinary action. Browsing of recordings for no valid reason is not permitted

7. Access to Call Recordings

Requests for call recordings from individuals is handled through a Subject Access Request (SAR) and such requests must be made in writing to the Data Protection Officer. Please refer to the [SAAS' Privacy Statement](#) for further information regarding Subject Access Requests.

Call recordings can be accessed by Line Managers for training and quality assurances purposes.

Specific call recordings may be accessed by Line Managers, Human Resource or any Disciplinary Hearing Panel as evidence in relation to any disciplinary process. In these cases requests for access (made in writing) may only be granted by SAAS Head of HR.

Copies of calls requested in relation to Subject Access Requests, Fraud Investigations and Complaints must be approved by the Information Manager, Head of Fraud and Complaints and Appeals Manager respectively and in line with internal guidance.

In the case of a request from an external body with law enforcement powers in connection with the prevention, detection or investigation of crime e.g. the Police, Home Office, DWP, HMRC etc the request must be made in writing to SAAS Head of Counter Fraud who will consider the request.

Access to call recordings for any other purposes is only allowed to satisfy a clearly defined business need. Written requests using the business case template detailing the reason for requesting access must be formally authorised by a B3 Manager in the relevant business area and then sent to the SAAS Service Desk.

All approved requests for call recordings will be actioned by the SAAS Service Desk.

The UK Data Protection legislation 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 Protection Officer to retrieve information relating to one or more individuals as easily as possible.