

## Telephone Call Recording Policy

Reynolds Accountants Limited t/a Reynolds and Co (hereinafter known as Reynolds and Co) records telephone conversations of calls from its central telephone system, this includes calls initiated as internal calls between extension users. Mobile calls may also be recorded.

The telephone call recording system in operation can record all incoming and outgoing telephone calls and recordings may be used for various reasons including but not exclusively to investigate compliance with the firm's quality standards, to support the investigation of complaints, to ensure that Reynolds and Co complies with regulatory procedures and to provide evidence for any investigation including regulatory.

### Communicating the Call Recording System

Reynolds and Co is required to make reasonable efforts to communicate that calls will be recorded. This will be done by:

- Publishing this policy on the firm's website; [www.reynoldsandco.co.uk](http://www.reynoldsandco.co.uk)
- Adding a notification in our Terms of Business.
- Adding a notification in our Staff Handbook.

### Procedures for Managing and Releasing Call Recordings

- 1 The recordings shall be stored securely, with access to the recordings controlled and managed by the Partners/Directors, Practice Manager, Office Manager and Finance Manager of the firm.
- 2 Access to the recordings is only allowed to satisfy a clearly defined business need and reasons for requesting access must be formally authorised by the relevant Partner/Director or Manager. 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 Browsing of recordings for no valid reason is not permitted.
- 4 The Data Protection Act 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.
- 5 Requests for copies of telephone conversations made as Subject Access Requests under the Data Protection Act must be notified in writing to the Data Protection Officer immediately and, subject to assessment, he/she will request the call recording and arrange for the individual concerned to visit Reynolds and Co 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 the Data Protection Officer 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 a Partner/Director or the Practice Manager who will consult with the Data Protection Officer before approval is granted.
- 8 Recordings of calls will be kept on file and periodically archived and stored securely.
- 9 Recordings will be deleted periodically.

This policy was last updated April 2019