

## **1. Policy Statement**

Parfitt Cresswell is committed to providing and maintaining the highest standards of client care and legal service. To assist us in this, protecting both our clients and our employees, and resolving any disputes, please note that we operate a telephone call recording system.

## **2. Policy Purpose**

We record telephone calls for the following lawful purposes:

- To govern call recording procedures at Parfitt Cresswell
- To set out the management of access, storage and use of call recordings
- To set out the purpose of call recording
- To ensure compliance with Applicable Legislation

## **3. Applicable Legislation**

- Data Protection Act 2018 (DPA 2018)
- The UK General Data Protection Regulation (UK GDPR)
- Investigatory Powers (Interception by Businesses etc for Monitoring and Record-keeping Purposes) Regulations 2018

## **4. Purpose of Call Recording**

Calls may be recorded and retained for any of the following purposes ('the Purposes'):

- Quality assurance; help improve the services that we provide
- Help protect our staff from abusive or nuisance calls
- Complaint & dispute resolution; establish the facts in the event of a complaint either by a client or prospective client to assist in resolving it
- Establish the facts and assist in the resolution of any claims made against Parfitt Cresswell Ltd
- To ascertain or demonstrate standards that are or ought to be achieved by persons using the system

- This could include monitoring for the purposes of quality control or employee training
- To pursue our own legitimate interests
- Security & contractual performance; for the performance of a contract
- Compliance & regulatory standards
- Training & development

## **5. Communicating the Call Recording System**

Where possible, we will inform the caller that their call is being monitored/recorded for the reasons stated above so that they have the opportunity to consent by continuing with the call or hanging up.

We will make every reasonable effort to communicate that calls may be recorded. This will be communicated to actual and prospective clients and/ or general callers by:

- Publishing this policy on the Parfitt Cresswell website
- Including this policy in our Terms of Business and Letter of Engagement when commencing a business relationship with a client
- Informing all clients and callers that call the general switchboard in the first instance via a recorded announcement for incoming calls

Not all calls are automatically recorded. Calls which are not received via the Parfitt Cresswell main switchboard may not be automatically recorded and will only be recorded by Parfitt Cresswell if the employee decides that it is necessary to do so in order to meet any of the Purposes.

## **6. Retention, Access and Storage of call recordings**

Recordings are retained for a standard period of three months, after which they are deleted, unless retained for a specific purpose (such as complaint handling, dispute resolution, or compliance with a legal or regulatory obligation), in accordance with the Data Protection Act 2018 and UK GDPR. Attendance notes of a call may be stored on the relevant matter file.

Any unauthorised access of call recordings without valid reason by an employee may be considered under our disciplinary procedure.

A person is entitled to request a copy of the personal data that we hold about them; this will include recorded telephone conversations. Details of how to request copies of personal data are available via the Privacy policy on [www.parfittcresswell.com](http://www.parfittcresswell.com).

Any recordings will be stored in a manner which is accessible in order to ensure compliance with the Data Protection Act 2018.