Recording and Storage of Learner and Customer calls

Potential powered up

Distribution	All staff		
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Author	Chief Customer & Marketing Officer		
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DOCUMENT CONTROL

Version	Name	Comment	Date
1.0	G. Dawkes	New issue as Leep Group	30.01.2026
1.1	S. Muscat	Updated policy	06.02.2026

Policy Statement
For the purpose of clarity, the term “Leep” refers to the family of Leep organisations – Back to Work, Leep Trade & Leep Talent.

Introduction

This policy outlines the requirements and procedures for recording and securely storing sales and learner onboarding calls. The objective is to ensure consistent documentation, quality assurance, staff training, and compliance with regulatory and data protection standards.

This policy applies to all staff, contractors, and third-party vendors involved in delivering sales, learner onboarding calls and courses through our managed IT systems.

To support service quality, improve learner experiences, and comply with organizational standards, certain teams within sales, learner onboarding and delivery calls will be recorded and securely stored in accordance with this policy.

Roles and Responsibilities

- IT Department is to ensure secure infrastructure is in place for storing recordings, both audio and video and managing access rights though the department’s specified systems – Microsoft Teams, Microsoft Sharepoint and Dubber.
- Sales, Operations/Onboarding & Delivery Teams are to ensure calls are recorded using approved systems and uploaded promptly to the designated storage solution. If the caller has not been informed that the call is being recorded via the automated message (queue functionality) then it is the responsibility of the employee to inform the caller of this fact.
- Compliance/Data Protection Officer(s) will ensure practices meet applicable data protection regulations (e.g., GDPR, **Telecommunications (Lawful Business Practice) Regulations 2000** HIPAA).

The calls of below departments will be recorded:

Organisation	Departments to be recorded:
Back To Work Training	Learner engagement / sales, onboarding calls, course delivery, progressions
Leep Talent	Sales, Customer and Learner calls and meetings
Leep Trade	Learner engagement / sales, onboarding calls, course delivery, progressions

Process

a. Recording Protocol:

- Use approved communication platforms with recording functionality
- Inbound calls – Calls made to a number with queuing functionality e.g. Main reception and head office numbers, deliver a recorded message informing callers of the call recording at the start of the call. For calls handled outside of a queue, it will be the employees responsibility to inform the learner of the recording.
- Outbound calls – If a call is being recorded, it is the responsibility of the employee to make the learner aware at the start of the call i.e. members of the departments listed in the table above.
- During call recordings staff may be required to pause the recording in the instance where personal details are discussed, such as confirmation of learner identification and then call recordings re-commenced once all details are collated.

b. Storage Requirements:

- Store all recordings in the designated, secure location within a designated area for each provision within the Group.
- Assign appropriate access permissions (restricted to relevant staff only).
- Maintain records for a maximum of 90 days, unless otherwise specified by compliance needs.

c. File Naming Convention:

- Use a standard naming format (e.g. course, learner name and date) for easy retrieval.

Data Protection and Privacy

- Obtain learner consent as part of the onboarding process or via documented terms and conditions.
- Ensure all storage complies with organisational data retention and deletion policies.
- Access to recordings must be logged and monitored.
- Ensure call recordings are deleted within 90 days.

Review

This policy will be reviewed annually or upon any major system or regulatory changes.