



CALL RECORDING POLICY

NWH Group Limited –
January 2026

Aim

This Call Recording Policy outlines the principles, responsibilities, and controls associated with the recording, storage, access, and use of customer calls. The purpose is to support service quality, training and development of NWH call handlers, compliance with legal and regulatory obligations, and to provide evidence in the event of disputes or investigations. The policy ensures that all call recording activities are carried out lawfully, ethically, securely, and transparently, with appropriate protections for customers and staff.

Purpose of Call Recording

Calls will be recorded for the following purposes:

Quality Assurance, Training and Development of our Call Handlers

To evaluate the quality of customer interactions through a structured call accreditation process; to provide feedback and coaching to call handlers; to identify opportunities for improved ways of working; to support customer-focused behaviours and promote continuous service improvement; to identify opportunities for customer growth and revenue expansion through service quality enhancements.

Business Transaction Evidence/Resolution of Disputes/Credit Notes

To maintain an accurate record of conversations relating to transactions, service agreements, or commitments. To provide evidence in the event of disputes, complaints, credit note requests or legal challenges.

Strategic Insight for Board Members

Board members will periodically listen to recorded calls to/for: Improve strategic understanding of customer needs and operational performance; early detection of risks or issues; identifying business opportunities/improvements; insight into customer sentiment and service experience; enhanced cultural alignment; accountability/leadership awareness and informed decision-making to support company values and customer satisfaction.

Legal and Regulatory Compliance

Call recording will comply with applicable laws and regulations, including data protection and privacy legislation and any industry-specific compliance requirements. Customers will

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be provided with an appropriate privacy notice indicating that calls will be recorded for quality and training purposes. It is the aim that this data will not be shared out with the company and will be used for internal purposes as outlined in this Policy.

PCI DSS Compliance

For PCI DSS compliance, all call recordings will be paused whenever payment details are being processed.

Storage and Security of Recordings

All recordings will be stored remotely (offsite) securely in the Azure cloud environment. Security features will include encryption at rest and in transit, access controls, audit logging, and adherence to business IT security standards. Recordings will be retained for 7 years, after which they will be securely deleted unless regulatory or legal requirements dictate otherwise.

Access Control

Details on authorised access, restrictions, and confidentiality.

Authorised Access

Only individuals with a legitimate business need may access recorded calls, including quality assurance and training personnel, managers and supervisors, Board members, and compliance/risk/audit teams.

Restrictions

Access rights will be approved and regularly reviewed under the Data Governance programme. Access is granted on a privilege basis. Downloading or exporting recordings is restricted to authorised individuals only. Any sharing of recordings must be secure and controlled for the purposes of training, feedback or dispute resolution only.

Confidentiality

All listeners must maintain confidentiality, use recordings strictly for approved purposes, and not disclose any personal or sensitive information outside authorised teams.

Call Accreditation and Feedback Process

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A structured call accreditation process will be implemented. This is to assess the quality of a percentage of calls from all call handlers, these call recordings will have consistent scoring criteria applied with documented feedback for regular coaching sessions, and action plans for improvement if required and recognition of excellent customer experience/performance. Feedback will focus on customer experience, accuracy, call quality, service quality and alignment with company values.

Customer and Staff Awareness

Customers will be informed by the IVR during the Welcome announcement that call recording is in place with this message 'all our calls are recorded for Quality and Training'. Staff will be made aware of this policy and trained on how call recordings are used within the business.

Data Subject Rights

Individuals may request access to their recorded information under relevant data protection laws. Requests will be handled by the Data Governance team.

Monitoring and Review

This policy will be reviewed annually or earlier if legal/regulatory requirements change, new systems or processes are introduced, or audit/risk findings require changes.

Policy Enforcement

Unauthorised access, misuse, or disclosure of recorded calls may result in disciplinary action, up to and including dismissal, and could lead to civil or criminal penalties.

Signed:

Date: 01/02/2026

Gavin Money

Managing Director

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