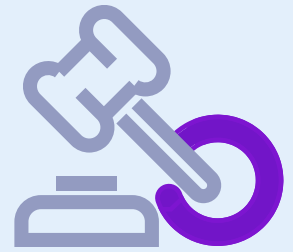




# The Case for

## Separating Voice Recording Capture and Assurance of Completeness Functions



Collaboration  
& Compliance

As voice communication remains a critical channel in regulated industries such as finance, healthcare, and legal services, the capture and validation of voice records has become a core compliance concern.

## Overview

Regulatory frameworks increasingly require not only that communications be recorded, but also that firms can demonstrate the completeness and integrity of those records.

This paper argues that Voice Recording regulation is likely to necessitate a structural separation between the supplier of the voice recording system and the provider responsible for assuring the completeness of those records.

The core reasoning lies in minimising conflicts of interest, ensuring audit independence, enhancing data integrity, and aligning with evolving regulatory expectations.

## Introduction

Voice recording has long been mandated in various regulated sectors to maintain audit trails, detect misconduct, and ensure customer protection. While the technology to capture voice data has advanced significantly, regulators are placing growing emphasis on the assurance of completeness—the ability to demonstrate that all required recordings were captured, unaltered, and are retrievable.



### **This assurance typically includes:**

- ▶ Verifying no communication gaps (missing calls).
- ▶ Detecting tampering or data loss.
- ▶ Demonstrating independence in audit and reporting.

Given this context, at Kerv we have observed a growing consensus that suggests separating the roles of the recording capture provider and the assurance service provider is necessary to meet regulatory expectations for impartiality and audit integrity. Continued conversations with customers, peers, business controls groups and contacts within the regulatory community have strengthened this viewpoint. We have summarised the findings from our research below.

## Key Arguments for Separation



### 1. Conflict of Interest and Independence

If a single vendor is responsible for both capturing and attesting to the completeness of voice records, there exists an inherent conflict of interest. Any failure in the capture system—due to technical, human, or process error—might go unreported or be downplayed if the same entity is charged with certifying the system's completeness.

Separation allows the assurance provider to operate without commercial or reputational bias, offering objective verification and greater trust in compliance reporting.

“Regulators consistently emphasise the importance of independent controls in internal audits and data validation to ensure accurate risk assessment.”



### 2. Regulatory Trends Toward Independent Verification

Global regulatory bodies (e.g., FCA, SEC, ESMA, MAS) have increasingly required independent third-party audits in areas such as trade surveillance, data protection, and financial reporting. This trend is now extending into voice and electronic communications compliance.

#### Examples:

- ▶ MiFID II requires that firms take “all reasonable steps” to record and monitor communications, including proof of completeness.
- ▶ Dodd-Frank mandates comprehensive audit trails for swaps-related communication.

These trends underscore the need for independent verification systems to demonstrate that firms are not marking their own homework.



### 3. Auditability and Chain of Custody

The chain of custody for voice recordings must remain provably intact for evidence to be admissible or for compliance to be validated. When the capture and assurance mechanisms originate from the same vendor, it becomes more difficult to establish independent oversight of this chain.

**Having separate parties ensures that if voice records are missing, altered, or compromised:**

- It can be detected by an independent entity.
- Responsibility can be accurately assigned.
- Remediation can be more transparent.

The SEC's Rule 17a-4(f) outlines requirements for electronic records retention and audit trails.



### 4. Operational Risk and Systemic Resilience

A combined supplier model presents a single point of failure—a risk vector that contradicts principles of operational resilience. Regulatory guidelines increasingly require vendor diversification and redundant assurance mechanisms for critical systems.

**By contrast, a model where capture and assurance are supplied independently ensures:**

- Better detection of anomalous gaps or system malfunctions.
- Separation of duties, a long-standing principle in risk management.
- More robust defence against intentional or accidental data loss.





## 5. Enhanced Innovation and Specialisation

**Separating the capture and assurance functions encourages market specialisation, enabling each supplier to focus on their core competencies:**

- ▶ Capture suppliers optimise recording fidelity, scalability, and integration.
- ▶ Assurance providers develop sophisticated analytics, alerting, and forensic tools.

This ecosystem promotes faster innovation and better regulatory outcomes, rather than dependence on a monolithic vendor.

## Industry Analogies

---

**Similar separation practices exist across other compliance-heavy domains:**

- ▶ **Cybersecurity:**  
Independent penetration testers audit systems developed by another firm.
- ▶ **Financial auditing:**  
External auditors certify the books, not the accounting software provider.
- ▶ **Medical diagnostics:**  
Independent labs validate test results from in-hospital devices.

These analogies reinforce the value of objective assurance mechanisms distinct from the system under test.

# Get ahead and stay ahead with Kerv

---

In an era where data integrity is a cornerstone of compliance, Voice Recording regulations are likely to mandate a clear separation between recording and assurance functions.

This separation mitigates conflicts of interest, aligns with regulatory trends, enhances operational resilience, and upholds the integrity of critical communications data. Organisations and regulators alike should view this separation not as a burden, but as a necessary step toward robust, transparent, and auditable compliance frameworks.

Voice compliance is no longer about simply recording conversations—it is about assuring their completeness, proving their integrity, and demonstrating accountability under the closest regulatory lens. Firms that act now to separate capture and assurance functions not only reduce compliance risk, but also establish stronger operational resilience and governance foundations.

Kerv stands ready to guide financial institutions through this evolution—helping them to implement forward-looking compliance architectures that are auditable, resilient, and trusted. By working with us, organisations can move beyond regulatory minimums and build communication compliance strategies that inspire confidence with regulators, clients, and stakeholders alike.

**Get in touch with Kerv to explore how we can help you separate capture and assurance, and strengthen your compliance framework for the future.**

---

This paper is one of four that aims to explore the evolution of voice regulations and how voice recording technologies have adapted to keep Financial Institutions compliant and fully prepared when the auditors require evidence of this.

**Visit our website or click on the links below to download the others in this series:**

- ▶ The Future of Voice Technology in Financial Services: A 5-Year Outlook Amid Regulatory Evolution
- ▶ The Future of Voice Recording Regulation For Financial Institutions
- ▶ The Case for Normalisation in Voice Recording Systems

The Kerv logo is written in a lowercase, rounded, purple font.

☎ 0330 1078009

✉ [hello@kerv.com](mailto:hello@kerv.com)

🖱 [www.kerv.com](http://www.kerv.com)