

Telephone Recording Privacy Notice

General Principles

The General Data Protection Regulation (GDPR) protects personal information held by organisations on computer and relevant filing systems. It enforces a set of standards for the processing of such information. In general terms it provides that all data shall be used for specific purposes only and not used or disclosed in any way incompatible with these purposes.

In the course of its activities the Practice will collect, store and process personal data, including the recording of all telephone calls, and it recognises that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

The Practice is registered with the Information Commissioner for all necessary activities under the GDPR.

Call Recording Overview

Purposes of call recording

The purpose of call recording is to provide an exact record of the call which can:

- Protect the interests of both parties;
- To train staff
- Help improve Practice performance and best practice;
- Help protect Practice staff from abusive or nuisance calls;
- Establish the facts in the event of a complaint either by a patient or a member of staff and so assist in resolving it;
- Establish the facts and assist in the resolution of any medico-legal claims made against the practice or its clinicians;
- A call recording may also be used as evidence in the event that an employee's telephone conduct is deemed unacceptable. In this situation the recording will be made available to the employee's manager, to be investigated as per the Practice Disciplinary Policy

The telephone call recording system in operation will record incoming and outgoing telephone calls and recordings may be used to investigate compliance with the Practice's policies and procedures, to provide further training, to support the investigation of complaints, to ensure the Practice complies with regulatory procedures and to provide evidence for any regulatory investigation.

Communicating the Call Recording System

The Practice 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. This will be communicated to patients by:

- Publishing a summary of this policy on the Practice website
- Informing all patients in the first instance via a recorded announcement for incoming calls

All incoming calls are recorded but not all outgoing recorded due to remote working and other working arrangements. Outgoing calls from the practice will normally be recorded and this includes telephone consultations.

Calls may not be recorded if there is a fault with the telephony system or if the equipment being used does not let calls be recorded, such as when a member of the team is working remotely.

If you object to this, you will need to end the call when you are told that calls may be recorded. Alternative methods of communication are available.

Online Contact Form - <https://florey accurx.com/p/D81633>
In Person at the Surgery

How long we keep your call recording

All call recordings are stored for up to 3 months after the call was made. Calls may be kept for longer if there is an ongoing investigation or training need identified. We have a right to delete calls before 3 months should the need arise.

Procedures for managing and releasing call recordings

- The recordings shall be stored securely, with access to the recordings controlled and managed by the Data Controller or any other persons authorised to do so by the Data Controller.
- Access to the recordings is only allowed to satisfy a clearly defined business need and reasons for requesting access must be formally authorised only by a relevant Partner or Manager.
- The browsing of recordings for no valid reason is not permitted
- Under the right of access provision of the Data Protection Act 2018, any individual can request to hear and/or receive a copy of call recordings that they are involved in. Requests for access can be submitted in writing online or via email at acorn.enquiries@nhs.net.

- Requesters may be asked to provide information about the originating telephone number, date and time of the call to aid in the call being found. All reasonable attempts will be made by the practice to confirm that the identity of the individual making the subject access request matches the identity of the caller. Access may be refused if sufficient proof of identity is not provided. The information you provided will be managed as required by Data Protection law
- 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 Controller who will complete the request for a call recording
- Requests for copies of telephone conversations as part of staff disciplinary processes will only be released with the agreement of the Data Controller, or any other person authorised by the Data Controller, who will consult with the Data Controller before approval is granted