



CALL RECORDING POLICY

Introduction

This policy outlines the practice's call recording process. The purpose of call recording is to provide a record of incoming and outgoing calls which can:

- Identify staff training needs
- Protect staff from nuisance and abusive calls
- Establish facts relating to incoming/outgoing calls made (e.g. complaints)
- Identify any issues in Practice processes with a view to improving them

Purpose

The purpose of this policy is to ensure that call recording is managed in line with GDPR and Data Retention requirements. This will generally involve the recording of telephone conversations which is subject to the Telecommunications Act 1984.

The Practice will make every reasonable effort to advise callers that their call may be recorded and for what purpose the recording may be used. This will normally be via a pre-recorded message within the telephone system, the privacy notice in our waiting room and on the Practice website. The voice file will be stored within a recording system to which the same rules of confidentiality apply.

Where a patient requests to listen to a recording then this should be allowed within the general provisional data subject access under the Data Protection Act 2018.

Scope

This policy applies to all Practice staff including any contracted or temporary workers. All calls via the telephone systems used in the Practice will be recorded, including:

- All external incoming calls
- All external outgoing calls made by Practice staff
- All external call transfers

Recording will automatically stop when the Practice staff member terminates the call.

Playback / Monitoring of Recorded Calls

Monitoring of the call recordings will be undertaken by the senior management team. Any playback of recordings will take place in a private setting and where applicable, individuals



should be given the opportunity to listen to relevant recordings to receive feedback and developmental support.

All recordings will be stored securely online, and access to these will be controlled and managed by the senior management team.

Recordings will be accessed by logging in to a dedicated, password protected online system.

Calls will be retained by the Practice for a period of 3 months.

Confidentiality

The Data Protection Act allows access to information that is held about an individual and their personal data. This includes telephone calls.

Requests for copies of telephone conversations can be made under the Data Protection Act as a 'Subject Access Request'. After assessing whether the information can be released, the requestor can be invited to the Practice premises to hear the recording. The right to be forgotten does not override legal and compliance obligations.

If there is a request from an external body relating to the detection or prevention of a crime (e.g. police), then requests for information should be directed to the Practice Manager or senior management team. Under GDPR, organisations are prohibited from recording the personal conversations of staff, even with consent, and therefore need to ensure that while business calls are recorded, personal calls always remain private.