

Telephone Call Recordings for Dr P Miles and Partner

Document History

Document Reference:	TCR1
Document Purpose:	This policy sets out the practice Dr P Miles and Partner staff, including those working on behalf of the Practice, when complying with Data Protection legislation within the practice.
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Next Revision Due:	December 2019
Developed by:	Julie Sherratt - Practice Manager
Policy Sponsor:	Practice Manager
Target Audience:	This policy applies to any person directly employed, contracted, working on behalf of the Practice or volunteering with the Practice.
Associated Documents:	All Information Governance Policies and the Information Governance Toolkit, and Data Security and Protections Toolkit 2018

Dr P Miles and partner has a telephone system capable of recording conversations. Like many other organisations, this is a standard practice that:

allows the recording of telephone calls for quality monitoring, training, compliance and safeguarding purposes.

These recordings will only be used for the purposes specified in this policy.

The call recording facility is automated and accommodates incoming calls received

from outside the surgery and external calls being made by a member of staff.

If calls are transferred to a team that does not have call recording on their lines, the call recording will cease to act once the call is successfully transferred, but will continue if it is transferred to any of the teams identified above. If the call comes in to a non-call recorded line and then is transferred to one that is, the staff member should notify the caller that their call will be recorded.

There is a recorded message in place to inform callers that their call is being recorded.

2. Purpose of this call recording policy

In order to maintain high standards and protect the public and staff we need to record all telephone calls received into the surgery and retain them for a limited period of time.

We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant legislation. This includes:

- The Data Protection Act 1998;
- The European General Data Protection Regulation (GDPR);
- The Human Rights Act 1998;
- The Regulation of Investigatory Powers Act 2000;
- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- Privacy and Electronic Communications Regulations 2003

3. Scope of policy

All calls made to the surgery will be recorded. Under normal circumstances a call will not be retrieved or monitored unless:

- There is a threat to the health and safety of staff or visitors or for the prevention or detection of crime;
- It is necessary to check compliance with regulatory procedures; or
- It will aid standards in call handling through use in training and coaching our staff.
- It is for safeguarding purposes.

4. Collecting information

Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with the current Data Protection Act and the European General Data Protection Regulation. It will be:

- Adequate, relevant and not excessive
- Used for the purpose(s) stated in this policy only and not used for any other purposes;
- Accessible only to managerial staff after securing permission from the Practice manager
- Treated confidentially;
- Stored securely; and
- Not kept for longer than necessary and will be securely destroyed once the issue(s) in question have been resolved.

5. Advising callers that calls are being monitored/recorded

Where call recording facilities are being used we will inform the caller that their call is being monitored/recorded for quality / training purposes so that they have the opportunity to consent by continuing with the call or hanging up.

There is a recorded message in place to inform callers that their call is being recorded.

We will publish our policy on our website.

6. Related policies

- Data Protection Policy
- Information Security Assurances Policies
- Disciplinary Policy
- Safeguarding Policy
- Privacy Policy

7. Procedures for managing and releasing call recordings

- The recordings shall be stored securely, with access to the recordings controlled and managed by the Data Protection Officer.
- Access to call recordings will be given to Managers
- Individuals requesting access to their call recordings will be dealt with as a subject access requests. Please refer to the practice Data Protection Policy/GDPR for further information regarding Subject Access Requests.
- Browsing of recordings for no valid reason is not permitted.
- Every individual has the right to access the information that we hold about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way to enable the Data Protection Officer to retrieve information relating to one or more individuals as easily as possible.

Recordings of calls will be kept on file and periodically archived to external hard drives and stored in accordance with our data protection policy.