

THE RANSOME PRACTICE

GDPR - Recording of Telephone Calls 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 practice staff training needs
- Protect practice staff from nuisance or abusive calls
- Establish facts relating to incoming/outgoing calls made (e.g. complaints)
- Helps us identify ways to improve so that we provide the best quality care to our patients

Purpose

The purpose of this policy is to ensure that call recording is managed in line with DPA & 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, on the practice website and posters within the waiting room at the surgery. The voice file may be stored within the clinical system or within the telephone system to which the same rules of confidentiality will apply.

Where a patient requests to listen to a recording then this should be allowed within the general provision of 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 internal incoming and outgoing calls made by the practice staff
- Call transfers

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

Callers must be advised that the call will be recorded for quality/training purposes - this can be in the form of an automated voice message or similar.

Playback / Monitoring of Recorded Calls

Monitoring of the call recordings will be undertaken by The Data Controller at the Practice who is the Practice Manager. Playback of recordings will take place in a private setting and where applicable, individuals should be given the opportunity to listen to the relevant recordings to receive feedback and developmental support.

All recordings and call recording equipment will be stored securely, and access to these should be controlled and managed by the practice Data Controller who is the Practice Manager.

Requests for copies of telephone conversations can be made under the Data Protection Act as a "Subject Access Request". This must be done in writing and after assessing whether the information can be released, the requestor can be invited to the practice premises to hear the recording.

Practice Data Controller (Practice Manager) will access the recordings by logging into the practice telephone system (Daisy Communications) and accessing audio recording calls log.

Confidentiality

The Data Protection Act allows access to information that is held about them and their personal data. This includes recorded telephone calls. Recordings should be stored in such a way that will enable easy access to the information relating to one or more individuals.

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 Jane Johns, Practice Manager who is the Practice *Data Controller* to carry out the request for the recording.

Call recordings are kept secure and the data is retained for 3 months.