



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 practice staff training needs
- Protect practice staff from nuisance or 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
- Support clinicians with a record of telephone consultations.

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 and on the website. All recordings will be held securely by the systems provider and can be uploaded as an audio file to the clinical record if required, via the integration app, or downloaded to the local practice network. By downloading the recording to their local network, the security of this recording then becomes the responsibility of the practice.

Where a patient requests to listen to a recording then this should be allowed within the general provision of a data subject access request under the Data Protection Act and GDPR regulations.

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 and on the practice websites

Playback / Monitoring of Recorded Calls

Monitoring of the call recordings will be undertaken by the partners and/or senior staff (General Manager, Office Administrator/Nurse Manager). Any 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 will be controlled and managed by senior staff as detailed above.

Recordings will be accessed by logging into a dedicated, password protected computer system.

Calls will be retained by the Practice for up to 12 months.

Patients who wish to opt out of call recording will be asked to come to the practice and speak in person.

Confidentiality

The Data Protection Act allows access to personal 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.

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.

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 to carry out the request for the recording.

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.