

Call Recording Policy

Author: Practice Manager

Audience: All

Implementation date: 15/10/18

To be reviewed: October 2019

Version	Summary of changes	Author	Date
1.1		Practice Manager	10/10/2018

Approval date:	Approved by:
11/10/2018	GP Partners

Development Process:	Date:
Published on practice website	15/10/2018
Published in employee policies	12/10/2018

Contents

1. Introduction	page 4
2. Purpose of this call recording policy	page 4
3. Legal basis for call recording	page 5
4. Scope of policy	page 5
5. Collecting information	page 5
6. Advising callers that calls are recorded/monitored	page 6
7. Related policies	page 6
8. Procedures for managing a releasing call recordings	page 6

1. Introduction

Queensferry Medical Practice ('the Practice') has a telephone system that is capable of recording conversations during inbound and outbound telephone calls. This is standard practice in many organisations and allows Queensferry Medical Practice to record telephone calls for:

- Quality monitoring.
- Staff training.
- Monitoring compliance.
- Safeguarding of staff and patients.

All calls received to the Practice and made from the Practice will be retained in line with our Data Protection Policy and Data Retention Schedule.

There is a recorded message which informs incoming callers that their call is being recorded. Employees are made aware that their calls are recorded through the Practice employment policies.

2. Purpose of this call recording policy

The Practice determines the need to record telephone calls for the following purposes:

- To safeguard all patients and third parties discussed by the caller to, if necessary, clarify the health or personal information provided.
- To safeguard vulnerable and disadvantaged patients from inappropriate, inadequate or suboptimal service.
- To provide further evidence in the event of a grievance or complaint from staff, patients or a third party.
- To safeguard all Practice staff in the case of abusive or threatening behaviour from a caller, be that a patient or third party.
- To enable effective staff training leading to higher standards of patient care.
- To enable performance monitoring in the event of concerns raised in line with the Practice employment policies.

3. Legal basis for call recording

The following legal bases can be attributed to the need to record inbound and outbound telephone calls from the Practice as per Article 6 of the GDPR:

- **Legitimate interest:** the processing of employee personal and sensitive data is necessary to safeguard their interests in terms of employment and welfare.
- **Legitimate interest:** the processing of patients and third party personal and sensitive data is necessary to safeguard their interests in terms of their health, the health of a third party and any grievance or complaint brought against the Practice.
- **Public task:** Queensferry Medical Practice processes personal and sensitive data to provide healthcare in the patients' and public interest, in line with our contractual commitments to the NHS.
- **Vital interest:** The nature of healthcare work at Queensferry Medical Practice means that life can potentially be protected through call recording by clarifying sensitive data.

4. Scope of this policy

Although all calls will be recorded, under normal circumstances calls will not be retrieved or monitored. The following exceptions are deemed abnormal circumstances which may result in the retrieval and monitoring of a call or a series of calls.

- It is necessary to investigate a complaint or grievance.
- When a training need has been identified.
- There is a threat to health and/or safety of staff, patients or a third party.
- It is necessary to check compliance with regulatory procedures.
- For safeguarding purposes.

5. Collecting information

Personal and sensitive 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 purpose.
- Accessible only to the Practice Manager, Deputy Practice Manager and GP partners.
- Treated confidentially.
- Stored securely and encrypted.
- Not kept for longer than necessary and will be securely destroyed in line with the Practice Data Retention Schedule.

6. Advising callers that calls are recorded/monitored

There is a recorded message which informs incoming callers that their call is being recorded. Employees are made aware that their calls are recorded through the Practice employment policies.

The policy is published for employees on the internal Share Drive and for all on the Practice website.

7. Related policies

- Data Protection Policy
- Confidentiality Policy
- Employee Handbook and related policies
- Privacy Policy

8. Procedure 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 (Practice Manager).

Access to call recordings will be given only to those individuals stated in this policy. Browsing of recordings for no valid reason is not permitted.

Individuals requesting access to their call recordings will be handled as subject access requests.

Every individual has the right to access the information that the Practice holds about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way as 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 a secure server and protected by encryption.

An individual's right to be forgotten will be addressed on a case-by-case basis. There may be a legal basis to refuse such a request eg in the event of sensitive health data being contained in call recordings or in the event of establishing, advancing or defending a claim.