Call Recording Policy

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**1.0 Purpose**

The purpose of this policy is to govern the procedures for call recording within Temple Sowerby Medical Practice and the management of access and use of telephone call recordings.

The recording of telephone calls was implemented in order to support effective training and delivery of excellent customer service, and to enable the Practice to deal efficiently with internal or external complaints.

**2.0 Scope**

The policy aims to minimise intrusion by restricting access to and use of recordings to limited and specified purposes only. This policy outlines:

• Recorded information

• Purposes of call recording

• Access and availability

• Information Security (including Data Protection and Notification)

• Monitoring and review

**3.0 Recorded information**

All calls received or made from any extension will be recorded utilising Temple Sowerby Medical Practice call recording system and will be stored securely within the service provider’s systems for up to 12 months.

Telephone calls currently included in the call recording scope both incoming and outgoing are in the following services:

• Patient advice and any voice communications

• Clinical Consultations

• Audio from some video consultations

• General enquiries

Video is not being recorded, however the voice from some recordings may be recorded

**4.0 Purposes of call recording**

The purpose of call recording is to provide an exact record of the call which can:

• help protect staff from abusive or nuisance calls;

• establish the facts in the event of a complaint either by a client or a member of staff and so assist in resolving it;

• help identify training needs and to support training new and existing officers; and

• assist in the Practice quality control to identify any issues in our processes, with a view to improving them.

In addition, recordings may provide evidence for crime prevention purposes.

**5.0 Internal access and availability**

Access and playback of recordings will be carefully controlled

Only those with the appropriate persons can access calls (i.e. the Practice Manager & Practice Partners). They are required to maintain a secure and private password, which is auditable and traceable within the software.

Access to calls may be for a number of reasons, the main reasons will be for checking accuracy, answering complaints, and for training to improve service and skills. In addition, recordings may be accessed by the phone system service team for the purpose of maintaining the call recording system.

Any individual, permanent or temporary employee may request to hear call recordings in which they are personally involved. They should make a request via email or in writing detailing the reason for hearing the recording to: the Practice Manager,- paula.breen@nhs.net

The Practice Manager will provide the ability for the call or relevant calls to be listened to on the Practice premises in the presence of the Practice Manager or another designated individual. Copies of call recordings will not be provided to individuals or taken off the Practice premises.

Individuals will not normally have access to listen to recorded calls unless the call relates to them.

Browsing of call recordings without a specific valid reason is not permitted.

Specific call recordings may be provided for purpose of a Disciplinary Hearing for evidence in a disciplinary process.

**6.0 Information security (including data protection and notification)**

Recordings constitute the personal data of both the caller and the operator, the Practice Manager is the Data Controller. They will be managed in such a way that the rights of data subjects (callers and operators) can be fulfilled, ensuring all the obligations of the data controller are observed, as per the organisation’s Call Recording Policy.

Every inbound caller is notified that the call is recorded and why before the conversation is opened. This will be done through a pre-recorded message in the organisation’s telephone welcome message before connection is made to an employee. All relevant organisational communications will also refer to a copy of this policy which will be located on the organisation’s website.

A caller may request that their call is not recorded. In this situation the caller will normally be advised to contact Temple Sowerby Medical Practice either in writing or by email. In exceptional circumstances a caller who does not wish to be recorded will have the call recording switched off. This decision will be made by a call taker, when he or she judges that not doing so could cause distress to the caller.

Recordings will normally be retained for 12 months and then automatically deleted.

Some recordings may be retained for longer than 12 months for the following reasons,

if:

• the call content is required for a complaint. In this case the recording will be retained until the completion of the complaint procedure and the expiry of any appeals period. If necessary, the recording will be retained until the end of any employment tribunal proceedings.

• they have been identified by a member of Temple Sowerby Medical Practice management team as valuable for staff training. In this case the recording will be retained until it is no longer useful for this purpose.

• the call is identified as evidence for the record-keeping requirements of Temple Sowerby Medical Practice procedure for dealing with unacceptable behaviour towards staff and unreasonably persistent complainants.

Callers have the right to listen to recordings made of their own calls, requests for access need to be made via Temple Sowerby Medical Practice Subject Access Request procedures.

These recordings will be located by reference to the date and time of the call and the operator’s identity. Callers asking to listen recordings of their calls will be required to provide the reason for the request and enough information about originating telephone number, date and time of the call and operator to enable them to be found.

All reasonable attempts will be made to confirm that the identity of the individual making the subject access request matches the identity of the caller. If in doubt the final decision will be made by the Data Protection Officer (Practice Manager). The Data Protection Officer will also balance the privacy of the caller or Temple Sowerby Medical Practice Employee with the rights of the individual making a subject access request when coming to a decision. A person requesting the right to listen to a call will also be permitted to make a transcript of the call. It is the Practice Managers responsibility to ensure all employees are aware of call recording policy and procedures.

**7.0 Monitoring and review**

Access to the system is logged and is traceable through the use of identifiable username and secure password. Access and usage may be monitored at any time to ensure adherence with the policy. If a breach of procedure is believed to have taken place, the concern should be raised with the Data Protection Officer (Practice Manager) in the first instance. This policy will be reviewed on a bi-annual basis or when significant changes to the call recording system take place.

**8.0 Document Control**

Temple Sowerby Medical Practice Call Recording Policy Version 1.0

Author Paula Breen, December 2022, review date December 2024

**9.0 Revision History**

Revision Date: December 2022