

PCIG Consulting Template

Practice Call Recording Policy

Version: 1.0

Date: 1 April 2020

This template is for use by Practices to Comply with the GDPR requirement to have a policy regarding processing of patient data. The template is Generic in design as PCIG Consulting have clients across the UK, local sharing arrangements and area specific sharing or processing will need to be added by the practice.

Change Control

Version	To	Change	Date
1		New Policy	
1			
1			
1			
1			
1			
2			

Holmcroft Surgery

Practice Call Recording Policy

Document History

Document Reference:	IG08
Document Purpose:	This policy sets out the practice [Holmcroft Surgery] expect from all staff, including those working on behalf of the Practice, when complying with Data Protection legislation within the practice.
Date Approved:	1 April 2020
Version Number:	2
Status:	FINAL
Next Revision Due:	April 2021
Developed by:	Paul Couldrey - IG Consultant
Policy Sponsor:	Senior Partner
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 2019
DS&P Toolkit Standard	1.1 1.2

1. General Principles

The General Data Protection Regulation (GDPR) protects personal information held by organisations on computer and relevant filing systems. It enforces a set of standards for the processing of such information. In general terms it provides that all data shall be used for specific purposes only and not used or disclosed in any way incompatible with these purposes.

In the course of its activities the Practice will collect, store and process personal data, including the recording of all telephone calls, and it recognises that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

The Practice is registered with the Information Commissioner for all necessary activities under the GDPR.

2. Call Recording Overview

Purposes of call recording

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

- Protect the interests of both parties;
- Help improve Practice performance and best practice;
- Help protect Practice staff from abusive or nuisance calls;
- Establish the facts in the event of a complaint either by a patient or a member of staff and so assist in resolving it;
- Establish the facts and assist in the resolution of any medico-legal claims made against the practice or its clinicians;
- A call recording may also be used as evidence in the event that an employee's telephone conduct is deemed unacceptable. In this situation the recording will be made available to the employee's manager, to be investigated as per the Practice Disciplinary Policy

The telephone call recording system in operation will record incoming and outgoing telephone calls and recordings may be used to investigate compliance with the Practice's policies and procedures, to provide further training, to support the investigation of complaints, to ensure the Practice complies with regulatory procedures and to provide evidence for any regulatory investigation.

The Practice will record telephone conversations from its central telephone system. All call recordings are encrypted and stored on a secure server at the system provider's headquarters.

3. Communicating the Call Recording System

The Practice will inform the caller that their call is being monitored/recorded for the reasons stated above so that they have the opportunity to consent by continuing with the call or hanging up. This will be communicated to patients by:

- Publishing a summary of this policy on the Practice website
- Informing all patients in the first instance via a recorded announcement for incoming calls

For outbound calls, including telephone consultations, where no automated announcement exists, the caller will inform the patient that their call is being recorded and the reasons for such.

4. Procedures for managing and releasing call recordings

- a) The recordings shall be stored securely, with access to the recordings controlled and managed by the Data Controller or any other persons authorised to do so by the Data Controller
- b) Access to the recordings is only allowed to satisfy a clearly defined business need and reasons for requesting access must be formally authorised only by a relevant Partner or Manager. All requests for call recordings should include the following:
 - The valid reason for the request
 - Date and time of the call if known
 - Telephone extension used to make/receive the call
 - External number involved if known
 - Where possible, the names of all parties to the telephone call
 - Any other information on the nature of the call
- c) The browsing of recordings for no valid reason is not permitted
- d) The GDPR allows persons access to 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 Controller to retrieve information relating to one or more individuals as easily as possible
- e) Requests for copies of telephone conversations made as Subject Access Requests under the GDPR must be notified in writing to the Practice immediately and, subject to assessment, he/she will request the call recording and arrange for the individual concerned to have access to hear the recording
- f) In the case of a request from an external body in connection with the detection or prevention of crime e.g. the Police, the request should be forwarded to the Data Controller who will complete the request for a call recording
- g) Requests for copies of telephone conversations as part of staff disciplinary processes will only be released with the written agreement of the Data Controller, or any other person authorised by the Data Controller, who will consult with the Data Controller before approval is granted
- h) Recordings of calls will be encrypted and stored electronically in a secure environment. Call recordings will periodically be archived, in line with electronic and paper file archiving time scales, to external hard drives
- i) Call recording are 265bit encrypted and provide secure user password protected logon access control. Recordings can be quickly located using multiple search criteria to ensure GDPR requirements for Right to Access, Right to be Forgotten and Data Portability can be complied with

Infringement of this Policy could expose the Practice to data breaches and subsequent fines or substantial compensation.

Any infringement of this Policy is considered by the Practice to be a serious offence and may result in disciplinary action. In the event that any member of staff feels he/she has accidentally breached the above policy will be required to inform their line manager immediately.