**Telephone Call Recording Policy**

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 a way that is 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 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 under the GDPR.

**Introduction**

The purpose of recording incoming and outgoing calls:

* Identify practice staff training needs
* Protect practice staff from abusive or nuisance calls
* Protect the interests of both parties
* Establish facts relating to incoming/outgoing calls made (for example for complaints)
* Identify any issues in practice processes with the view to improve them

Telephone consultations are recorded in the medical record in the same way as a face-to-face consultation and retained for the same period as the rest of the medical record. The telephone call is not stored in the medical record.

**Purpose of this Policy**

To ensure that telephone call recordings are in compliance with the GDPR. We will make every effort to advise callers that their call will be recorded and for what purpose the recording may be used. This will be via a pre-recorded message within the telephone system, in our practice leaflet and on the website.

The voice file will be stored within the telephone system to which the same rules of confidentiality will apply.

The recordings are stored securely on a system provided by Silvercloud for 12 months, after which they are automatically deleted (with the exception of an ongoing complaint that has not yet completed). They are protected through the company’s Data Protection Policy which is compliant with GDPR legislation.

If patients request to listen to a recorded telephone call, this should be allowed within the general provision of Data Subject Access request under the Data Protection Act 2018. This will be authorised by a Partner or the Practice Manager/Data Controller.

**Overview**

The policy applies to all practice staff. All calls via the telephone system in the practice will be recorded, including:

* External incoming calls
* External outgoing calls made by staff and clinicians
* Call transfers

Recording automatically stops when the call is terminated by a member of our team.

**Playback and Monitoring of Recorded Calls**

This will be undertaken by the Practice Manager/Data Controller and/or Partners and Senior staff. This would take place in a private setting and, where applicable, individuals would be given the opportunity to listen to the calls and receive feedback and support. Developmental in the case of staff.

Access to all recordings is controlled, managed by senior staff and stored securely.

Requests for copies of telephone conversations can be made under the Data Protection Act as a Subject Access Request. An assessment will be made whether the information can be released and the requester will be invited to the practice to hear the recording.

If an external body makes a request relating to detection or prevention of a crime (for example police), requests for information should be directed to the Practice Manager/Data Controller.