

EASTFIELD MEDICAL CENTRE

DR FIRFIREY DR SAYO DR GUEST ASSOCIATE GP DR KEMP ASSOCIATE GP DR PRICE ASSOCIATE GP

TEL: 01723 582297 FAX: 01723 582528

TELEPHONE 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 (e.g. to aid workforce planning)

This policy does not cover telephone consultations with clinical staff.

Telephone consultations are a clinical event and are recorded in the clinical record. This will generally be via a standard coded and text entry using the clinical system in the traditional way and will be retained for the same period as the remainder of the medical record.

Purpose

The purpose of this policy is to ensure that call recording is managed in line with Data Protection Act 2018 requirements.

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 be via a pre-recorded message within the telephone system at the beginning of the call. The voice file will be stored within the telephone recording system software to which the same rules of confidentiality will apply. The practice's data protection registration covers voice files similarly to other data.

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 General Data Protection Regulations (GDPR)/Data Protection Act. Subject to any technical malfunctions preventing calls from being available for playback.

S:\B82024\Practice Policies & Procedures\Telephone Call Recording Policy.doc
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Scope

This policy applies to all practice staff including any contracted or temporary workers.

All external incoming and outgoing calls made by practice staff via the telephone system will be recorded.

Recording will automatically stop when the practice staff member terminates the call.

Callers will be advised that the call will be recorded for training and monitoring purposes in the form of an automated voice message plus information contained on the surgery website in the form of this document.

Playback, Monitoring and Storage of Recorded Calls

Monitoring of the call recordings will be undertaken by the Practice Manager or supporting management team.

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 on site at the practice and access to these will be controlled and managed by the IT Manager.

Call recordings will be retained by the practice for 6 Months. Thereafter they will be deleted.

Confidentiality

The Data Protection Act allows patients access to information that is held about them. This includes recorded telephone calls.

Requests for copies of telephone conversations can be made under the Data Protection Act as a "Subject Access Request".

After assessing whether the information can be released, the requestor can be invited to the practice premises to hear the recording. A data subjects have the right to the erasure of personal data concerning them. 'The right to be forgotten' does not override legal and compliance obligations.

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.

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. Therefore, the practice phone system must only be used for the purposes of the business.