

Telephone Call Recording for GDPR

Summary of Call Recording Policy

Outline:

This summary outlines the practice's call recording process that is in operation. The purpose of call recording is to provide a record of incoming and outgoing calls, which can:

- Protect the interests of both parties
- Help improve practice performance and service delivery in the interests of providing best care
- Protect Practice team from nuisance or abusive calls
- Establish facts relating to incoming/outgoing calls made (e.g. concerns, complaints and medico-legal claims)
- Contract compliance as part of Contemporaneous Record Keeping part of Records Management Policy and Access to Health Records

Aim:

The aim of this policy is to ensure that the telephone call recording is operated in accordance with General Data Protection Regulations 2018. This will involve the recording of telephone conversations, which are subject to the Telecommunications Act 1984.

For call recording, the following GDPR conditions are met:

Article 6, e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;"

Article 9, (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems

Process:

The Practice will make every reasonable effort to advise Patients that their call will be recorded and for what purpose the recording may be used.

Where a patient requests a copy of a recording then this is authorised under the general provision of data subject access requests part of the GDPR. Any requests for copies of telephone conversations made as Subject Access Requests under the GDPR must be notified in writing to the Practice.

Playback / Monitoring of Recorded Calls:

Call recordings are securely stored as 256bit encrypted files with access restricted to the Practice Manager by use of login credentials. The monitoring of the call recordings will be undertaken by the Practice Manager and/or Assistant Practice Manager. Any playback of recordings will take place in a secure and confidential environment.

The General Data Protection Regulation 2018 allows access to information that is held about you. This includes recorded telephone calls. Telephone call recordings are stored in such a way that will enable easy access to the information relating to one or more individuals. All requests for access are by Subject Access Requests as per GDPR; applications should be made in writing to the Practice.