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Call Recording Policy

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1.0 Purpose

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

The implementation of recording of telephone calls was agreed in order to support effective training and delivery of excellent customer service, and to enable the organisation 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 Portland Medical's call recording system and will be stored securely within the service provider's systems for up to thirty-six months.

Telephone calls currently included in the call recording scope 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 Portland Medical 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 organisations quality control to identify any issues in their 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 as per the requirements of the Organisation's data protection policy.

Only those with the appropriate authority can access calls. 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 X-on Service teams for the purpose of maintaining the call recording system.

Any individual Portland Medical permanent or temporary employee may request to hear call recordings in which they are personally involved. Portland Medical managers may request to hear call recordings which involve a member of their team. They should make a request via email or in writing detailing the reason for hearing the recording to: Business Manager, Operations Manager or Management Support Officer.

Specific call recordings may be provided to Human Resources or the Disciplinary Hearing Panel for evidence in a disciplinary process.

The management will support requests for call recordings for calls transferred internally between sections as each manager will be limited to their service area element of each call.

Members will not normally have access to listen to recorded calls unless the call relates to them, or they have the written authorisation of the requester.

Browsing of recordings for no valid reason is not permitted.

6.0 Information security (including data protection and notification)

Recordings constitute the personal data of both the caller and the operator. Therefore they will be managed in such a way that the rights of data subjects (callers and operators) can be fulfilled, and all the obligations of the data controller (Umar Sadat IG Health dpo.swl@nhs.net 07894 826 037) are observed, as per the organisation's data protection 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 is 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 Portland Medical 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 thirty-six months and then automatically deleted.

Some recordings may be retained for longer than thirty-six months for the following reasons, if:

- 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 Portland Medical's management team as valuable for staff training. In this case the recording will be retained until it is no longer useful for this purpose.
- identified as evidence for the record-keeping requirements of Portland Medical's procedure for dealing with unacceptable behaviour towards staff and unreasonably persistent complainants.

Clients/callers have the right to listen to or have copies of recordings made of their own calls, requests for access need to be made via Portland Medical's 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 for the recordings of their calls will have 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. The Data Protection Officer will also balance the privacy of the caller or Portland Medical Employee with the rights of the individual making a subject access request when coming to a decision.

A permanent copy of the recording will be provided in a format the organisation can reasonably expect the enquirer will be able to use taking account of the individual's preference (if any) and practicality and cost of preparation. Formats could include WAV, MP3 or other digital format, or a transcript.

It is the operation 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 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

Organisation	Portland Medical
Title	Call Recording Policy
Version	1.0
Author	Flemming Jensen
Review Date	May 2022

9.0 Revision History

Revision Date	Reviser	Previous Version	Description of Revision
May 2020	Flemming Jensen	N/A	Original/Draft