

THE CULVERHAY SURGERY

WOTTON-UNDER-EDGE, BERKELEY & FRAMPTON-ON-SEVERN

Telephone Call Recording Policy

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1.0	July 2025		Natalie Ford	Review July 2027

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:

- Review and improve services
- Train, develop and manage staff and medical trainees
- Protect staff and patients
- Prevent, detect, investigate and prosecute allegations, complaints, claims and/or fraud relating to patients, other organisations or The Culverhay Surgery staff.

Sometimes, calls may not be recorded if:

- there's a technical fault with the telephony system
- a call handler is using equipment which does not let calls be recorded.

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 normally be via a pre-recorded message within the telephone system, via signage at the practice and the practice website. 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.

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 and via an information notice displayed at the surgery plus information contained on the surgery website.

Playback, Monitoring and Storage of Recorded Calls

Monitoring of the call recordings will be undertaken by the Practice Manager or Operations Managers.

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 Operations Managers at each site.

Recordings will be accessed by logging into a dedicated, password protected computer system.

Call recordings will be retained by the practice for 90 days.

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.