



# HORDEN GROUP PRACTICE

Dr N Sahoo    Dr S Santhanakrishnan    Dr G Brown

Sea View Health Centre  
Fourth Street  
Horden  
Peterlee  
Co Durham, SR8 4LD  
Tel: 0191 586 4210/586 3783

The Health Centre  
Bede Way  
Peterlee  
Co Durham  
SR8 1AD  
Tel: 0191 587 0808

---

## Call Recording Policy

The purpose of this policy is to govern the procedures for call recording within Horden Group Practice and the subsequent management of access and use of telephone call recordings.

The implementation of recording of telephone calls was agreed in order to support effective delivery of service to our patients and support the training of practice staff.

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:

- 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
- To support effective delivery of service to our patients and support the training of practice staff.

The policy aims to minimise intrusion by restricting access and use of recordings to limited and specified purposes only. The policy outlines:

- Recorded information.
- Purposes of call recording.
- Data Protection.
- Access and availability.

## Recorded information and storage

All calls received or made (incoming and outgoing) from the practice will be recorded utilising the practices call recording system. Call recordings are securely stored in a web-based portal for up to 36 months. Calls are automatically deleted after this 36-month retention period.

Any recordings which may need to be used for the purposes of criminal proceedings or longer-term investigations that have been extracted from the system, will be kept in a secure place until any such proceedings/investigations have come to an end. At this point, they will be deleted.

## Purposes of call recording

The purpose of call recording is to provide an exact record of the call which can:

- Assist in the assurance of quality of the service the Practice provides to its callers.
- Assist in the management of the practice's patients care.
- Maintain an up to date and accurate patient record.
- To help protect practice staff from abusive and/or nuisance callers and provide evidence in assessing the serious of threats.
- To clarify the content of particular conversations in the event of any concerns or complaints either by a patient or a member of staff and assist in the resolution of it.
- Help identify staff training needs, manage the performance of Practice staff, and to support in the training of new and existing staff members.
- Assist in the Practices quality control to identify any issues in practice processes, and aid in addressing them.



# HORDEN GROUP PRACTICE

Dr N Sahoo    Dr S Santhanakrishnan    Dr G Brown

Sea View Health Centre  
Fourth Street  
Horden  
Peterlee  
Co Durham, SR8 4LD  
Tel: 0191 586 4210/586 3783

The Health Centre  
Bede Way  
Peterlee  
Co Durham  
SR8 1AD  
Tel: 0191 587 0808

- 
- To provide evidence for criminal proceedings.
  - To investigate fraudulent or inappropriate activity.

## Data Protection

Phone call recordings constitute the personal data of both the caller and the call operator. Therefore, all calls will be managed in such a way that the rights of the data subjects (callers and operators) can be fulfilled, and all obligations of the data controller (the practice) are observed, as per the Data Protection Act 1998.

Every caller is notified that their call is recorded, and why, when calling the practice and before conversation is initiated. This will be done through a pre-recorded message in the practice's telephone welcome message.

A caller may request that their call is not recorded. In this situation, the clinician may choose to pause the recording and advise the caller of this. The recording will then be paused. This process is initiated by clicking more on the options on the telephone handset when on a call then record, then pause, a box on the screen notifies the user that the call recording is paused. To then resume recording the user must click resume, another box will appear which states call recording resumed. The caller may also be advised to contact the practice either in writing, e-mail or in person by attending the practice. Recordings will normally be retained for 6 months and then automatically deleted.

Some recordings may be retained for longer than this for the following reasons:

- **The content of the call is required to provide effective medical care to our patients:** In this case the call may be retained indefinitely, but will be moved to the relevant patient's medical record where possible. A transcription or summary of the call may also be made and attached with the audio recording.
- **The content of the call 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 appeal period. If necessary the recording will be retained until the end of any tribunal proceedings.
- **The content of the call has been identified as valuable for practice staff training:** In this case the recording will be retained until it is no longer useful for this purpose. The data subject(s) will be informed if their call has been identified, asked to provide their consent and will have the right to object to this processing under the Data Protection Act 2018 and UK GDPR.
- **The content of the call has been identified as evidence for Criminal proceedings or investigations:** In this case the recording will be retained for the duration of the investigation or process. Depending on the allegations the data subject(s) may or may not be notified of this processing. The recording(s) may be shared with law enforcement as evidence under Schedule 2, Part 1 of the Data Protection Act 2018.

## Access and availability of call recordings

Internal access and playback of call recordings will be carefully controlled by the Practice Manager (Data Controller) or any other persons authorised to do so by the Data Controller. Access to calls may be made for specific and documented reasons in line with the purposes outlined within this policy. Browsing of call recordings for no valid reason is not permitted.



# HORDEN GROUP PRACTICE

Dr N Sahoo    Dr S Santhanakrishnan    Dr G Brown

Sea View Health Centre  
Fourth Street  
Horden  
Peterlee  
Co Durham, SR8 4LD  
Tel: 0191 586 4210/586 3783

The Health Centre  
Bede Way  
Peterlee  
Co Durham  
SR8 1AD  
Tel: 0191 587 0808

---

## Subject Access Requests (SARs)

Callers have the right to listen to, or have copies of, recordings made of their own calls. Under the right of access provision of the Data Protection Act 2018, any individual can request to hear and/or receive a copy of call recordings that they are involved in. Requests for call recordings are processed in compliance with data protection legislation and General Data Protection Regulation (GDPR) and are subject to the one calendar month response time frame.

Requests for access can be submitted to the Practice in writing, or verbally/in person. The relevant recordings will be located by reference to the date and time of the call and the identity of the caller. Requesters may be asked to provide information about the originating telephone number, date and time of the call to aid in the call being found.

All reasonable attempts will be made by the practice to confirm that the identity of the individual making the subject access request matches the identity of the caller. Access may be refused if sufficient proof of identity is not provided. A permanent copy of the recording will be provided in a format the practice can reasonably expect that the requester will be able to use, taking account of the requester's preference (if any).

## Objection

If an objection to the call being recorded is received (which would typically be during the phone call), the Practice should offer to stop recording the call (see Data Protection for instructions on how to pause a recording) or arrange alternative methods of correspondence with the Patient. If the call is recorded automatically, the Practice should state this to the patient and offer that the call is deleted immediately (if it does not fit any retention criteria listed in the Practice's retention schedule).