KINGSWINFORD

Medical Practice

# Practice Call Recording Policy

**Change Control**

| Version | To | Change | Date |
|---|---|---|---|
| 1 | | New Policy | |
| 1 | 2 | Reviewed and updated | 6 April 2021 |
| 2 | 3 | Review for DSP Compliance | 19 January 2022 |
| 3 | 4 | Reviewed and SAR added | 4 January 2023 |
| 4 | 4.1 | Reviewed no changes required | 24 March 2024 |
| 4.1 | 5 | Reviewed and updated for DSP Toolkit 2024/25 | 23 April 2025 |
| 5 | 5.1 | Reviewed and updated for DSP Toolkit 2025/26 | 12 February 2026 |

**Document History**

| | |
|---|---|
| Document Reference: | |
| Document Purpose: | This policy sets out the practice Kingswinford Medical Practice expects from all staff, including those working on behalf of the practice, when complying with Data Protection legislation within the practice. |
| Date Approved: | 12 February 2026 |
| Version Number: | 5.1 |
| Status: | FINAL |
| Next Revision Due: | February 2027 |
| Developed by: | Paul Couldrey – IG Consultant |
| Policy Sponsor: | Victoria Evans - Practice Business Manager |
| Reviewed by: | Victoria Evans – Practice Business Manager |
| Target Audience: | This policy applies to any person directly employed, contracted, working on behalf of the practice or volunteering with the practice. |
| Associated Documents: | All Information Governance Policies and the Information Governance Toolkit, and Data Security and Protections Toolkit 2025/26 |
| DS&P Toolkit Standard | |

# Practice Call Recording Policy

## General Principles

The UK General Data Protection Regulation 2016 (UK GDPR) and the Data Protection Act 2018 (DPA) and the Data Use and Access Act 2025 (DUAA) protects personal information held by organisations. These enforce a set of standards for the processing of such information. In general terms it provides that all data shall be used for specific purposes only and not used or disclosed in any way incompatible with these purposes.

In the course of its activities the practice will collect, store and process personal data, including the recording of all telephone calls and it recognises that the correct and lawful treatment of this data will maintain confidence in the practice and will provide for successful business operations.

The practice is registered with the Information Commissioner for all necessary activities under the UK GDPR/DPA/DUAA

## Call recording overview

### *Purposes of call recording*

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

- Protect the interests of both parties
- Help improve practice performance and best practice
- Help protect practice staff from abusive or nuisance calls
- Establish the facts in the event of a complaint either by a patient or a member of staff and so assist in resolving it
- Establish the facts and assist in the resolution of any medico-legal claims made against the practice or its clinicians
- A call recording may also be used as evidence in the event that an employee's telephone conduct is deemed unacceptable. In this situation the recording will be made available to the employee's manager, to be investigated as per the practice Disciplinary Policy

The telephone call recording system in operation will record incoming and outgoing telephone calls and recordings may be used to investigate compliance with the practice's policies and procedures, to provide further training, to support the investigation of complaints, to ensure the practice complies with regulatory procedures and to provide evidence for any regulatory investigation.

Through the cloud-based telephony system (Surgery Connect), the practice automatically records all telephone conversations both inbound and outbound. All call recordings are stored and archived automatically within the cloud-based system. Those with supervisor user rights can access all calls via the User Console application within the Surgery Connect SSO. Users with clinician access have access to call recordings involving themselves only.

## Communicating the call recording system

The automated message when calling the practice will inform the caller that their call is being monitored/recorded for the reasons stated above so that they have the opportunity to remove their consent. If the caller does this, the practice user receiving the call can turn off the recording function by pressing the red recording icon on the phonebar, or the option on the deskphone.

This will be communicated to patients by:

- Publishing a summary of this policy on the practice website
- Informing all patients in the first instance via a recorded announcement for incoming calls

For outbound calls, including telephone consultations where no automated announcement exists, the caller will inform the patient that their call is being recorded and the reasons for such.

## Procedures for managing and releasing call recordings

a) The recordings shall be stored securely, with access to the recordings controlled and managed by the data controller or any other persons authorised to do so by the data controller

b) Access to the recordings is only allowed to satisfy a clearly defined business need and reasons for requesting access must be formally authorised only by a relevant GP Partner or the Practice Business Manager. All requests for call recordings should include the following:

   - The valid reason for the request
   - Date and time of the call if known
   - System user/staff member making/receiving the call
   - External number involved if known
   - Where possible, the names of all parties to the telephone call
   - Any other information on the nature of the call

c) The browsing of recordings for no valid reason is not permitted

d) The UK GDPR allows persons access to information that we hold about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way to enable the data controller to retrieve information relating to one or more individuals as easily as possible

e) Requests for copies of telephone conversations made as Subject Access Requests under the UK GDPR must be notified in writing to the practice immediately and, subject to assessment, he/she will request the call recording and arrange for the individual concerned to have access to hear the recording

f) In the case of a request from an external body in connection with the detection or prevention of crime e.g. the police, the request should be forwarded to the data controller who will complete the request for a call recording

g) Requests for copies of telephone conversations as part of staff disciplinary processes will only be released with the written agreement of the data controller, or any other person authorised by the data controller, who will consult with the data controller before approval is granted

h) Recordings of calls will be encrypted and stored electronically within the User Console application of the Surgery Connect Portal for three years unless deleted by a user with supervisor user access.

i) Call recordings are encrypted and provide secure user password protected logon access control. Recordings can be quickly located using multiple search criteria to ensure UK GDPR requirements for Right to Access, Right to be Forgotten and Data Portability can be complied with

Infringement of this policy could expose the practice to data breaches and subsequent fines or substantial compensation.

Any infringement of this policy is considered by the practice to be a serious offence and may result in disciplinary action. In the event that any member of staff feels he/she has accidentally breached the above policy, they will be required to inform their line manager immediately.