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## CUMBERLAND HOUSE

# Practice Call Recording Policy

### Document History

Document Reference:	IG08
Document Purpose:	This policy sets out Cumberland House expect from all staff, including those working on behalf of Cumberland House, when complying with Data Protection legislation within Cumberland House.
Date Approved:	1 April 2020
Version Number:	2
Status:	FINAL
Next Revision Due:	April 2021
Developed by:	Paul Couldrey – IG Consultant
Policy Sponsor:	Practice Manager
Target Audience:	This policy applies to any person directly employed, contracted, working on behalf of Cumberland House or volunteering with Cumberland House.
Associated Documents:	All Information Governance Policies and the Information Governance Toolkit, and Data Security and Protections Toolkit 2019
DS&P Toolkit Standard	1.1 1.2

## 1. General Principles

The General Data Protection Regulation (GDPR) protects personal information held by organisations on computer and relevant filing systems. It enforces 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 Cumberland House 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 organisation and will provide for successful business operations.

Cumberland House is registered with the Information Commissioner for all necessary activities under the GDPR.

## 2. 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 Cumberland House 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 Cumberland House 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 Cumberland House's policies and procedures, to provide further training, to support the investigation of complaints, to ensure Cumberland House complies with regulatory procedures and to provide evidence for any regulatory investigation.

Cumberland House will record telephone conversations from its central telephone system. All call recordings are encrypted and stored on a secure server at the system provider's headquarters.

## 3. Communicating the Call Recording System

Cumberland House will inform the caller that their call is being monitored/recorded for the reasons stated above so that they have the opportunity to consent by continuing with the call or hanging up. This will be communicated to patients by:

- Publishing a summary of this policy on Cumberland House 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.

## 4. 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