

Priory Medical Group Call Recording Policy

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Policy created by: Madeleine Volpe

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The data controller for the practice: Kelly Clark, Practice Manager

Introduction:

The Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation 2016 (UK GDPR) protect personal information held by businesses and organisations, both physically and electronically on computers and relevant filing systems. A set of standards are enforced for the processing of such information which means all data should be used for specific purposes only and not disclosed or used in any way incompatible with these purposes.

Priory Medical Group collects, stores and processes personal data, including the recording of all telephone calls, both incoming and outgoing, and it preserves this data correctly and lawfully, maintaining confidentiality.

Under UK GDPR/DPA, the practice is registered with the Information Commissioner for all necessary activities and work with and alongside to main high standards of data protection and confidentiality.

Call Recording Overview:

The purpose of recording both incoming and outgoing calls is to provide an exact record for the following:

- To help improve the performance of the practice.
- To create best practice.
- Protect the interests of both parties.
- Help protect practice staff from nuisance and abusive calls.
- Establish facts in the event of a complaint/issue, either by the patient or the member of practice staff, to assist in resolving it.
- Establish the facts and assist in the resolution of any legal claims made against the practice or its clinicians.
- The call recording may be used as evidence in the event an employee's telephone conduct is deemed unacceptable. In this instance, the recording may be made available to the manager of the employee, to be investigated as per the disciplinary policy of the practice.
- Used to investigate compliance with the practice's policies and procedures.
- May be used 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.
- Any other reason that the call data may need to be shared that are within reasonable grounds of confidentiality and data handling and abide by the law the practice operates by.

Calls are recorded via our cloud-based telephone system 'System Connect', and this records all calls both incoming and outgoing. The call recordings are stored and archived automatically within the cloud-based system for no more than 3 years.

The management team at Priory Medical Group are given 'supervisor user rights' and can access all calls via the User Console application within the Surgery Connect SSO.

All other staff have access to call recordings involving themselves only; and only for a maximum period of 7 days before they clear from their system and are then only accessible by those with 'supervisor user rights'.

Communicating the call recording system

There is an automated message when calling the practice which will inform the caller that their calls to and from Priory Medical Group are being monitored/recorded for the reasons stated above so that they can have the opportunity to remove their consent.

If consent is not given, then patients have two options:

- They will need to attend our reception and appointments in person.
- Call recording can be paused if consent for recording is declined by the patient.

This call recording system policy will be communicated to patients by:

- The publishing of this policy on the practice website.
- Informing all patients via a recorded announcement for incoming calls that calls are recorded, both incoming and outgoing.

The procedure for managing and releasing call recordings:

All 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.

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 Manager. All requests for call recordings should include the following:

- A valid reason for the request.
- The date and time of the call if known.
- Information regarding the 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.

The browsing of recordings for no valid reason is not permitted and will be investigated internally if GDPR/Compliance is compromised. Any data breach will be disclosed to relevant parties as required by law.

Accessing your data

As per UK GDPR and our own data protection / privacy policies within the practice, patients are allowed access to information that we hold about them. This includes recorded telephone calls. Therefore, 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 but via the following means:

- 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, they will request the call recording and arrange for the individual concerned to have access to hear the recording.
[A guide to subject access | ICO](#)
- 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.

Additional information

- 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.
- 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.
- 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.

Any 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 any member of staff feels they have accidentally breached the above policy, they will be required to inform their line manager immediately.