

	Title	Call Recording Policy
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	Author	Data Protection Enterprise Ltd
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Equality Impact Assessment

The school aims to design and implement services, policies and procedures that meet the diverse needs of our provision, population and workforce, ensuring that none are placed at an unreasonable or unfair disadvantage over others. We are confident that this policy does not place anyone at an unreasonable or unfair disadvantage, and is compliant with relevant equalities legislation.

Where the school or staff are referred to, the policy and the following procedures apply to all staff working for Corbets Tey School on all sites.

Version Control

Version	Date	Author	Description of Change
1	20/01/2022	Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy

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1. INTRODUCTION

The call recording facility is automated, and recordings will only be used for the purposes specified in this policy.

All incoming and outgoing calls are recorded by the school. When an individual contacts the school, a recorded message will inform the caller that their call is being monitored and recorded so that they have the opportunity to consent by continuing with the call or hanging up.

An itemised call log will be retained of all calls made and received on our telephone network to selected telephone extensions. This will include details of the external caller's number and the date, time and the duration of the call.

All conversations are recorded for the purpose of:

- Protecting staff from aggressive, abusive or nuisance calls;
- Improving the quality of the service provided;
- Identifying staff training needs and to support effective training

2. PURPOSE

The purpose of this policy is to govern the procedures for call recording within the school and the management of access and use of telephone call recordings. In order to maintain high standards and protect the public and staff the school need to record inbound and outbound telephone calls and retain them for a limited period of time.

The school shall ensure that the use of these recordings is fair and that the school comply with the requirements of the relevant legislation which includes:

- The Regulation of Investigatory Powers Act 2000;
- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- The Telecommunications (Data Protection and Privacy) Regulations 1999;
- The UK General Data Protection Regulation and the Data Protection Act 2018; and
- The Human Rights Act 1998.

The purpose of this policy is to ensure that all recordings are fair, proportionate and managed in line with legislation.

3. RECORDED INFORMATION

All calls internal, in and outbound calls will be recorded and stored securely. These recordings will only be listened to if there is a complaint or a subject access request is submitted.

4. NOTIFICATION

All reasonable effort will be made to communicate that calls may be monitored and recorded. This will be communicated by:

- A pre-recorded message which will be played to all callers that phone the school, prior to the call being answered;
- Placing a notice on the school website.

5. STORAGE AND RETENTION OF CALL RECORDINGS

Personal data collected in the course of recording activities will be processed fairly and lawfully and in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.

Data collected will be:

- ◇ Used for the purpose(s) specified in this policy only and not used for any other purpose(s);
- ◇ Accessible only to specified and authorised staff;
- ◇ Kept confidential;
- ◇ Stored securely and
- ◇ Not kept for longer than necessary and will be securely destroyed in line with the school retention policy.

6. ACCESS TO CALL RECORDINGS

Access to call recordings will be restricted to authorised staff and will not be made more widely available.

Recordings are accessible via a password-protected software login.

7. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request access to call recordings relating to themselves under the Data Protection Act.

All requests should be made in writing where possible. Individuals submitting requests for access will be asked to provide sufficient information to enable recordings relating to them to be identified. For example, date and time of the call.

The school reserves the right to refuse access to call recordings where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. ACCESS TO AND DISCLOSURE OF CALL RECORDINGS TO THIRD PARTIES

There will be no disclosure of recorded data to third parties other than to authorised personnel, such as the police and service providers to the school where these would reasonably need access to the data (e.g., investigators).

The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

9. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

10. LINKS WITH OTHER POLICIES

This Call Recording policy is linked to the School's:

- Data Protection Policy
- Record Retention and Deletion Policy
- Information Sharing Policy
- Subject Access Policy
- Information Security Policy

The ICO also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk