



LIFE ACADEMIES TRUST

LEARN • INNOVATE • FLOURISH • EXCEL

Call Recording

Document Detail	
Approved	May 2018
Approved by	Trust Board
Next Review date	August 2024

Contents

Contents	2
1. Introduction	3
2. Which Calls Will Be Recorded?	3
3. Notification	3
4. Covert Monitoring	3
5. Storage and Retention of Call Recordings	3
6. Access to Call Recordings	4
7. Subject Access Requests (SAR)	4
8. Access to and Disclosure of Call Recordings to Third Parties	5
9. Complaints	5
10. Breaches	5

1. Introduction

This is the Academy's approved policy relating to the use of recording telephone calls.

Biggleswade Academy has a telephone system that is capable of recording telephone conversations. All external conversations are recorded for the purposes of:

- Protecting staff from aggressive, abusive or nuisance calls
- Allowing authorities to appraise calls following a hoax or real threat
- Improving the quality of the service provided
- Identifying staff training needs and to support effective training

The purpose of this policy is to ensure that all call recordings are fair, proportionate and managed in line with the Data Protection Act (DPA and the General Data Protection Regulation (GDPR)).

2. Which Calls Will Be Recorded?

All external telephone calls made or received by staff at the Academy are recorded. These recordings will only be listened to if the Academy Principal, determines it to be necessary.

3. Notification

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

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

4. Covert Monitoring

The Academy may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording

In these circumstances authorisation must be obtained from the Academy Principal.

Covert monitoring must cease following completion of an investigation.

5. Storage and Retention of Call Recordings

Recordings are automatically deleted from the phone system after 60 days. Specific recordings may be retained for longer if they are requested to be retrieved from the phone system within the initial 60 day period.

Recordings that are requested to be retained for longer are stored in a secure, access restricted location. Recordings stored in this area are deleted at termly intervals once they are over one year old. The only exception to this is under direct instruction from the Academy Principal.

6. Access to Call Recordings

Access to call recordings is restricted to the Technical Support Department and those staff authorised to listen to them and will not be made more widely available.

All requests for access to specific recordings are made via the IT Help Desk. When a request is made the Academy Principal is automatically notified and can approve or deny via E-mail response to the notification.

If approved, the Technical Support Department extract the recording from the phone system, add it to the secure storage area and provide the authorised staff member(s) with time-restricted access to the specific recording(s)

Staff can request that specific recordings are retrieved to be held on file if they anticipate that they may be needed at a later date. If approved, the Technical Support Department extract the recording from the phone system and add it to the secure storage area. No further access to the recording is provided at this point in time.

Staff can also request to review specific call recordings without being given direct access to them. If approved, the Technical Support Department extract the recording from the phone system and add it to the secure storage area. The recording will then be played for the requesting member(s) of staff to listen to.

A log is kept of all recordings that are extracted.

7. Subject Access Requests (SAR)

Individuals have the right to request access to call recordings relating to themselves under the Data Protection Act. This is only possible if the telephone number that a call was made to or received from is provided.

All requests should be made in writing using the SAR request form to the Academy Principal. 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 call.

The Academy 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.

Please see the Subject Access Request policy for further details.

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). Requests by third parties should be assessed using the Third Party Request for Information policy.

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

9. Complaints

Complaints will be dealt with in accordance with the Complaints Procedure.

10. Breaches

Any breach of this policy may result in action being taken under the Disciplinary policy.