



LIFE ACADEMIES TRUST

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Call Recording

Document Detail	
Type of Document (Stat Policy/Policy/Procedure)	Policy
Category of Document (Trust HR-Fin-FM-Gen/Academy)	GEN
Index reference number	23
Approved	21/05/18
Approved by	CEO
Next Review date	21/05/21
Version	V1

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1. Introduction

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

LIFE Academies Trust has a telephone system that is capable of recording telephone conversations. All conversations are recorded for the purposes 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

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).

2. Which Calls Will Be Recorded?

Telephone calls received or made by staff at any Academy under LIFE Academies Trust are all recorded. These recordings will only be listened to if the CEO of LIFE Academies Trust, or the relevant Academy Principal/Head of Setting, determines it to be necessary.

3. Notification

All reasonable efforts must 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 Trust and related Academies websites

4. Covert Monitoring

The Trust 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 CEO / relevant Academy Principal/Head of Setting.

Covert monitoring must cease following completion of an investigation.

5. Storage and Retention of Call Recordings

The Trust typically retains call recordings for 12 months and recordings are saved directly to a dedicated server machine.

Should a recording be required, it is uploaded to a password-protected cloud location (G Suite), managed by the Tech Support Department and read-only access is granted to the authorised person(s) for a limited period of time after which access automatically expires. Recordings cannot be downloaded from this location

6. Access to Call Recordings

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

Direct access to the dedicated server machine on which recordings are saved is restricted to the Technical Support Department

Recordings are accessible via password-protected software login - access is restricted to the Technical Support Department

Should a recording be required, it is uploaded to a password-protected cloud location (G Suite), managed by the Technical Support Department, and read-only access is granted to the authorised person(s) for a period of 7 days after which access automatically expires. Files uploaded to this location are configured to deny requests to download to an external location.

All recordings with expired access are deleted from this cloud location as and when they are no longer required. This will usually be annually unless a specific request is received from the CEO/Principal/Head of setting.

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 using the SAR request form to the CEO of LIFE Academies Trust. 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 Trust 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 school's Third Party Request for Information policy.

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. 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 Trust Disciplinary policy.