**Privacy Notice – Recording Telephone Calls**

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| **Plain English explanation**  The surgery has the ability to record telephone calls to protect patients and staff and other health workers. Patients are protected by our having a record of our conversations with you, staff and other health workers are protected from potential abuse. All calls to and from the surgery are recorded. We also occasionally use recordings for staff training and quality control.  When you register with us we will make this clear to you and we will also make this clear to you via our web site and other sources of information, such as a recorded message that will be played before inbound calls are answered.  Calls, or transcripts of calls, audio or audio-visual recordings or elements of the discussion you have with the clinicians that contain clinical information may be added to your medical records, but this will be clarified with you at the time.  The recordings are stored securely on a system provided by Horizon Telecom and are protected through the company’s GDPR Policy.  These recordings will not usually be shared outside the practice.  If we hold recordings that have not been deleted you can ask for copies by putting a request to the Practice in writing via a Subject Access Request.  The surgery records all calls, both inbound and outbound. If you wish for the call recording to be deleted then please tell the member of staff at the time.  We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections. | | |
| 1) **Data Controller** contact details | Lucie Wedgwood Surgery |
| 2) **Data Protection Officer** contact details | The Practice Data Protection Officer is Hayley Gidman of the NHS Midlands & Lancashire Commissioning Support Unit Information Governance Service Any queries regarding Data Protection issues should be addressed to her at: Email: mlcsu.ig@nhs.net Postal: Heron House 120 Grove Road Fenton Stoke-on-Trent ST4 4LX Tel: 01782 872648 |

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| 3) **Purpose of the processing** | To facilitate your access to care and in the case of telephone or other audio visual consultations for your direct care. |
| 4) **Lawful basis for processing** | The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR: Article 6(1) (e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’. Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...” We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”\* |
| 5) **Recipient or categories of recipients** of the processed data | Necessary data will be shared with Health and care professionals and support staff in this surgery. Clinical data or records of consultations may be transcribed or appended to the records we hold on you and may thence be shared at hospitals, diagnostic and treatment centres who contribute to your personal care. Actual recordings will not be shared with anyone outside the practice. Please see our Privacy Notice for Direct Care. The actual recordings are stored on the telephone system and after a designated period of time will be deleted. You will be informed if the recording is to be stored for longer than is set out in this Privacy Notice and you will informed the reasons for such. |
| 6) **Rights to object** | You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller or the practice. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance |
| 7) **Right to access and correct** | You have the right to access the data that is being shared and have any inaccuracies corrected. We can provide copies of recordings if they have not been deleted. There is no right to have accurate medical records deleted except when ordered by a court of Law. |
| 8) **Retention period** | We will keep recordings for the period of our contract with our provider. Clinical data transcribed from your telephone or other electronic consultations may become part of your clinical record and is retained according to relevant rules and regulations, see Privacy Notice on Direct Care. |
| 9) **Right to Complain.** | You have the right to complain to the Information Commissioner’s Office, you can use this link <https://ico.org.uk/global/contact-us/> or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website) |