



# Appointment Recording Policy

## **General Principles**

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) protects personal information held by organisations on computer and relevant filing systems. It enforces a set of standards for the processing of such information. In general terms it provides that all data shall be used for specific purposes only and not used or disclosed in any way incompatible with these purposes. In the course of its activities AC Medical Services Ltd. will collect, store and process personal data, including the recording of all medical appointments, and it recognises that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

AC Medical Services Ltd. is registered with the Information Commissioner for all necessary activities under the GDPR.

## **Medical Appointment Recording Overview**

### **Purposes of appointment recording**

The purpose of call recording is to provide an exact record of the call which can:

- Protect the interests of both parties;
- Help improve AC Medical Services Ltd. Practice performance and best practice;
- Help protect clinicians from abusive patients;
- Establish the facts in the event of a complaint either by a patient or a member of staff and so assist in resolving it;
- Establish the facts and assist in the resolution of any medico-legal claims made against the Organisation or its clinicians;
- A call recording may also be used as evidence in the event that an employee's telephone conduct is deemed unacceptable. In this situation the recording will be made available to the employee's manager, to be investigated as per AC Medical Services Ltd. Disciplinary Policy.

The recording system in operation will record all appointments, whether they be remote, or in person, and recordings may be used to investigate compliance with the Organisation's policies and procedures, to provide further training, to support the investigation of complaints, to ensure AC Medical Services Ltd. complies with regulatory procedures and to provide evidence for any regulatory investigation.

AC Medical Services Ltd. will record appointments from a remote speaker system, and recordings are password protected and stored on a secure server within AC Medical Services Ltd.

### **Communicating the Appointment Recording System**

AC Medical Services Ltd. will inform the patient that their call is being monitored/recorded for the reasons stated above so that they have the opportunity to consent by continuing with the appointment or not. This will be communicated to patients by:

- Publishing a summary of this policy on the Organisations website.
- Informing all patients in the first instance before the appointment is started.

### **Procedures for Managing and Releasing Appointment Recordings**

- a) The recordings shall be stored securely, with access to the recordings controlled and managed by the Data Controller/ Director of AC Medical Services Ltd. or any other persons authorised to do so by the Data Controller.
- b) 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 Director or Manager. All requests for call recordings should include the following:
  - The valid reason for the request
  - Date and time of the appointment if known
  - Where possible, the names of all parties involved in the appointment
  - Any other information on the nature of the appointment
- c) The browsing of recordings for no valid reason is not permitted
- d) The UK GDPR allows persons access to information that we hold about them. This includes recorded telephone calls. Therefore, the 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
- e) Requests for copies of appointment conversations made as Subject Access Requests under the UK GDPR must be notified in writing to the Organisation immediately and, subject to assessment, they will request the recording and arrange for the individual concerned to have access to hear the recording
- f) 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 recording
- g) Requests for copies of 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
- h) Recordings of calls will be password protected and stored electronically in a secure environment. Call recordings will periodically be archived, in line with electronic and paper file archiving time scales, to external hard drives
- i) Recordings 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

Infringement of this Policy could expose the Organisation to data breaches and subsequent fines or substantial compensation.

Any infringement of this Policy is considered by the Organisation to be a serious offence and may result in disciplinary action. In the event that any member of staff feels he/she has accidentally breached the above policy, they will be required to inform their line manager immediately.