

TAMWORTH HOUSE MEDICAL CENTRE

PRIVACY NOTICE FOR RECORDING OF TELEPHONE CONVERSATIONS

1. We may record telephone calls to:

- Review and improve services
- Monitor and review quality of care
- Train, develop and manage staff and medical trainees
- Prevent, detect, investigate and prosecute allegations, complaints, claims and / or fraud relating to patients, other organisations or Tamworth House Medical Centre (THMC) staff
- Protect staff and patients

We do this in the interests of offering a good service to our service users, patient safety, being a good employer and to protect public funds.

If you object to this, you will need to end the call when you are told that calls may be recorded.

Sometimes, calls may not be recorded if:

- there's a technical fault with the telephony system
- a call handler is using equipment which does not let calls be recorded

Tamworth House Medical Centre may record both incoming and outgoing telephone calls.

2. How will call recordings be used:

Quality monitoring: Written records only provide partial information. A call recording provides a more rounded view and allows us to better understand patient and staff experience and assess the processes applied. This can help us identify any improvement areas.

Training and development: Listening to a sample number of calls allows managers to identify training needs. Call recordings may also be used as part of training for medical students, GP registrars and other clinical staff in training at the practice. This is part of their clinical skills development.

Gaining a better understanding of our patients: Many calls are verbally resolved without the need to complete records. Listening to sample calls will help us better understand our patient and staff needs and gain a more informed view of organisations we signpost to.

Complaints and disputes: Some calls are verbally resolved. Where information is entered onto an electronic system this becomes the established record. In the event of a complaint or dispute, a call recording (if possible), may provide additional information to help us investigate any allegations.

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Employee safety and wellbeing: A recording may become a vital piece of evidence in the event of any threats being made to the organisation or an individual or in dealing with employment-related matters.

3. How your information is shared

The law requires THMC to share information from your medical records in certain circumstances. Call recordings may form part of your medical record. Information is shared so that the NHS or Public Health England can, for example:

- Plan and manage services
- Check that the care being provided is safe
- Prevent infectious diseases from spreading

We will share information with NHS Digital, the Care Quality Commission and the local health protection team (or Public Health England) when the law requires us to do so.

Call recordings may be shared internally within the practice. This includes team members, managers and GPs. They will only have access if the data is necessary for the performance of their roles.

We may share call recordings with NHS England or South West London Clinical Commissioning Group in order to respond to complaints made about the practice.

4. How long we keep your call recording

General call recordings will be retained for up to 36 months from the date of creation.

Call recordings may be linked to your patient record at the end of the call. Where this is the case, the recording will form an integral part of your NHS medical record and will therefore be stored as a permanent record.

The above retention periods are in line with the Records Management Code of Practice for Health and Social Care 2016.

5. There is written information on the website which says:

“We would like you to know that we record calls as part of our commitment to training, audit and quality assurance. The details you provide are recorded on our system and may be shared with other partner agencies”.

6. Can I request a copy of my call record

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Call recordings may have been destroyed in accordance with the practice retention schedule. If the recording is still available, you can request a copy of your conversation by contacting Tamworth House Medical Centre. This information will be provided to you in accordance with the terms of the Data Protection Act 1998.

We are required by law to provide you with the following information about how we handle your information and our legal obligations to share data.

Data Controller	Tamworth House Medical Centre is acting as the Data Controller.
Purpose of the processing	Your data is processed to: <ul style="list-style-type: none">• Review and improve services• Check and review quality of care• Train, develop and manage staff and medical trainees• Prevent, detect, investigate and prosecute allegations, complaints, claims and / or fraud relating to patients, other organisations or Tamworth House Medical Centre staff• Protect staff and patients
Lawful basis for processing	The lawful bases for processing this information are: Article 6(1)(a) – ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes.’ Article 6(1)(f) – ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.’

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	<p>Special Categories of Data may be processed as part of recorded telephone conversations. The lawful basis for such processing will be:</p> <p>Article 9(2)(a) – ‘the data subject has given explicit consent to the processing of those personal data for one or more specified purposes...’</p> <p>Article 9(2)(f) – ‘processing is necessary for the establishment, exercise or defence of legal claims....’</p> <p>Article 9(2)(h) – ‘processing is 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...’</p> <p>Article 9(2)(i) – ‘process is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices...’</p>
<p>Recipient or categories of recipients of the processed data</p>	<p>The data will be shared with:</p> <ul style="list-style-type: none"> • Healthcare professionals and staff within this surgery; • NHS Digital • Care Quality Commission • Local Health Protection Team or Public Health England • NHS England • NHS South West London CCG • With the court if ordered
<p>Rights to object?</p>	<p>You do not have the right to opt out or object to the recording of telephone calls. If you do not wish to have your call recorded then</p>

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	<p>you will need to contact us on our website www.tamworthhousemedicalcentre.co.uk or call into the surgery in person. However, you should be aware that this may have an impact on the speed and efficiency of the services you receive.</p>
Who is NHS England?	<p>NHS England is a national body established to support the NHS to deliver improved care for patients. It has seven regional teams that support the commissioning of healthcare services for different parts of the country. www.england.nhs.uk</p>
Who is NHS Digital	<p>NHS Digital is a national body which has legal responsibilities to collect information about health and social care services.</p> <p>It collects information from across the NHS in England and provides reports on how the NHS is performing. These reports help to plan and improve services to patients.</p> <p>Tamworth House Medical Centre must comply with the law and will send data to NHS Digital for example, when it is told to do so by the Secretary of State for Health or NHS England under the Health & Social Care Act 2012. https://digital.nhs.uk</p>
Who is Public Health England?	<p>The law requires us to share data for public health reasons, for example to prevent the spread of infectious diseases or other diseases which threaten the health of the population.</p> <p>We will report the relevant information to local health protection team or Public Health England</p>

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	<p>For more information about Public Health England and disease reporting see: https://www.gov.uk/guidance/notifiable-diseases-and-causative-organisms-how-to-report</p>
Right to access and correct	<p>You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff or see our our 'subject access request' Policy on the practice website.</p> <p>We are not aware of any circumstances in which you will have the right to delete or correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.</p>
Retention period	<p>GP Medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found at: https://digital.nhs.uk/article/1202/records-management-code-of-practice-for-health-and-social-care-2016 or speak to the Practice</p>
Right to Complain	<p>You have the right to complain to the Information Commissioners Office. If you wish to complain follow this link https://ico.org.uk/global/contact-us/ or call the helpline on 0303 123 1113</p>