



# **Milford Haven School**

## **Call Recorder Policy**

Date approved by Policy Committee: Autumn 2023

Date to be reviewed: Autumn 2024

Policy created and reviewed by: Business Manager



This Code of Practice is issued by the Ysgol Aberdaugleddau/Milford Haven School Governing Body. It is intended to provide guidance as to good practice for users of the Telephone call recorder system at Milford Haven School

This code is based upon the Code of Practice published by the Information Commissioner, which sets out the standards and requirements of the Data Protection 1998 Act and the General Data Protection Regulation (GDPR) 2018 to be met. In particular data should be:

- ❖ *Fairly and lawfully processed;*
- ❖ *Processed for limited purposes and not in any manner incompatible with those purposes;*
- ❖ *Adequate relevant and not excessive;*
- ❖ *Accurate;*
- ❖ *Not kept for longer than is necessary;*
- ❖ *Processed in accordance with individuals' rights;*
- ❖ *Secure;*
- ❖ *Not transferred to countries without adequate protection.*

The Governor nominated for Data Protection will have oversight of the operation of this aspect of the policy.



## Contents

PROCEDURES	4
Call Recorder System	4
Recording Process	4
Access to and disclosure of recordings to third parties	4
Storage of CCTV Images	5
Access by data subjects	6
Other rights	7
Viewing Log	7
Monitoring compliance with this code of practice	7
Use of mobile phones and cameras to record incidents	8
APPENDIX A	9
APPENDIX B	10
APPENDIX C	11



# PROCEDURES

## Call Recorder System

- Owner Operator Data and Controller of the Scheme – Ceri-Ann Morris, Headteacher, Ysgol Aberdaugleddau, Milford Haven School, Steynton Road, Milford Haven SA71 1AE
- The purposes of the Call Recorder in MHS is to provide safeguarding and training for staff
- The general management of the Call Recorder in MHS is provided by the School Network Manager (NM)

## Recorded Information

- All external calls are recorded, this includes incoming and outgoing calls
- External incoming calls being forwarded to another extension will continue to be recorded (e.g. calls coming to main receptions and then forwarded)
- Calls are not recorded when made internally

## Purpose of call Recordings

- Helping identify staff training, helping us to improve the quality of our customer service and to ensure the information we provide is consistent and accurate
- Ensure we have an accurate record of the call, to support any necessary investigation
- Establishing the facts in the event of a complaint and used in evidence during any associated investigation
- Helping protect staff from abusive calls

## Scope

- The Call Recorder system will not be used to monitor live conversations.
- Recordings are stored on the call recorder machine in an encrypted format and can only be accessed from the Call Recorder web interface by the Network Manager.
- Recordings are kept for a period of 1 year and then deleted from the system thereafter.
- Backups of the Call Recorder system are made on an encrypted drive and kept for a period of 3 months.
- The greeting on incoming calls clearly announces that the call will be recorded for training and safeguarding purposes at the beginning of the message.
- The fact that external calls are being recorded is included in our Privacy Policy which is available on our website



## **Export of recordings Process**

1. Exported recordings should not be retained for longer than is necessary and unless required for specific investigation or evidential purposes.
2. Exported Recordings that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.
3. Access to the Exported recordings should be restricted to a manager or designated member of staff who will decide whether to allow requests for access.
4. Listening of the Exported recordings should take place in a restricted area, for example, in a manager's or designated member of staff's office. Other employees should not be allowed to have access to that area when a listening is taking place.
5. Removal of the medium on which recordings are recorded, should be documented in Appendix A

## **Access to and disclosure of recordings to third parties**

All employees should be aware of the restrictions set out in this code or practice in relation to access to, and disclosure of, recordings.

1. Access to recordings will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.
2. All access to the medium on which the recordings are exported should be documented.
3. Disclosure of the recordings to third parties should only be made in limited and prescribed circumstances. Subject to paragraph 1 above, in disclosure will be limited to the following classes of persons/agencies.
  - ❖ Law enforcement agencies, where the recordings would assist in a specific enquiry;
  - ❖ Prosecution Agencies;
  - ❖ Relevant legal representatives
4. All requests for access or for disclosure should be recorded, if access or disclosure is denied, the reason should be documented.
5. If access to or disclosure of the recordings is allowed, then the following will be documented in Appendix B



6. Recordings will not be made more widely available – for example they should not be routinely made available to the media or placed on the Internet.

## Storage of Recordings

It may be necessary to save the Recordings for transfer to investigating agencies such as police and social services. Recordings should only be transferred to the securely password protected and encrypted drive that is kept in the school safe. One of the authorised users (i.e. one of the staff who have the system password) must be present at the time of the Listening and transfer to drive.

## Access by data subjects

1. In accordance with Section 7 of the Data Protection Act 1998 (Subject Access) and subsequent GDPR 2018 regulations, any individual who believes that their conversation has been captured by this scheme is entitled to make a written request to the Data Controller. Upon supply of essential information, a systems search will be conducted and subject to certain conditions, the individual will be allowed access to the personal data held. A fee may apply if the request is deemed unreasonable.

2. All subject access requests should be referred in the first instance to the Headteacher who will liaise with the BM and NM.

3. All staff involved in operating the equipment must be able to recognise a request for access to recordings by data subjects and how such requests are to be dealt with.

4. Data subjects should be provided with a standard subject access request form, a copy of this form is attached at Appendix C.

NB. The above form will also enquire whether the individual would be satisfied with merely Listening to the recordings. The form will also indicate that the response will be provided promptly and in any event within 28 days of receiving.

6. Prior to any authorised disclosure, the Headteacher will need to determine whether the recordings of another “third party” individual features in the personal data being applied for and whether these third party recordings are held under a duty of confidence,



## Listening Log

The Listening requests are kept on a Google sheet. All Listening Request must be recorded.



# APPENDIX A

---

## Call Recorder - Exporting of Recordings by Authorised School Staff

---

**Date:**

**Time:**

**Name of Persons Listening to the Recording:**

**Name Designation**

**Reason for the Listening:**

**Outcome, if any, of the Listening:**





## APPENDIX B

---

### Call Recorder – Access to and disclosure of recordings to third parties

---

**Date:**

**Time:**

**Identification of any third party who was allowed access:**

**Names of school staff present:**

**Reason for allowing access:**

**Crime incident number if applicable:**

**Signature of the person authorised to collect the medium – where appropriate:**

**Date and time copy created for evidential purposes:**



## APPENDIX C

---

### Call Recorder – Access by data subjects

---

**NAME:**

**ADDRESS:**

**DATE OF BIRTH:**

**TELEPHONE NUMBER:**

**Date conversation recorded:**

**Time conversation recorded:**

To carry out a search for the recordings, a fee may be payable.

The Headteacher will consider the request and respond within 28 days.