Policy for the Recording of Phone Calls

Data Protection Officer | September 2025

Minsthorpe Community College: A place where everyone plays a part in strengthening our learning community through Motivation, Commitment & Care.

Minsthorpe
Community College

Section 1

Aims

The aim of this policy is to ensure that the telephone call recording is operated in accordance with General Data Protection Regulations 2018. This will involve the recording of telephone conversations, which are subject to the Telecommunications Act 1984.

For call recording, the following GDPR conditions are met:

- Recording is necessary to protect the vital interests of one or more participants.
- Recording is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

It is the College's Policy to ensure call recordings are managed in line with UK Legislation:

- Regulation of Investigatory Powers Act 2000 ("RIPA")
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 ("LBP Regulations")
- Data Protection Act 2018
- The GDPR through the DPA 2018 above
- The Employment Practices, Data Protection Code
- Telecommunications (Data Protection and Privacy) Regulations 1999
- Human Rights Act 1998

Section 2

Outline

This summary outlines the College's recording process that is in operation. The purpose of call recording is to provide a record of incoming and outgoing calls, which can:

- Protect the interests of both parties.
- Help improve performance and support College staff in carrying out their role.
- Protect College staff from nuisance or abusive calls.
- Establish facts relating to incoming/outgoing calls made (e.g. concerns/complaints).

Section 3

Process

The College will make every reasonable effort to advise stakeholders that their call will be recorded and for what purpose the recording may be used. Recording services shall stop only when the Caller disconnects from the call.

Requests for copies of recordings will be considered under the general provisional of data subject access requests part of the GDPR. Any requests for copies of telephone conversations made as Subject Access Requests under the GDPR must be submitted in writing.

Section 4

Playback / Monitoring of Recorded Calls

Call recordings are securely stored as 256bit encrypted files with access restricted to the ICT services Team Leader (or Assistant Team Leader in their absence) by use of login credentials. The monitoring of the call recordings will be undertaken by Senior Staff. Call recordings will only be kept for one week unless requested by a stakeholder within this time period. Where a request for a phone call recording has been made through a subject Access Request (and this is available and appropriate to be actioned), individuals will be invited into College to listen to the call and written transcript can be agreed. Any playback of recordings will take place in a secure and confidential environment.

The College does not permit any meeting to be recorded via video or audio. Any meeting which requires a record will be minuted.

Final Section

Equality Assessment

This policy has been assessed with regard to its impact on equalities issue, with specific reference to the aims of the Equality Act 2010. The equality impact assessment focused on race, gender, disability, pregnancy and maternity, age, sexual orientation, gender identity and religion/belief.

Policy Review Schedule

Policy last reviewed:	Due for next review:	Role Responsible:
New policy September 2021	September 2023	Data Protection Officer (together with the Director of HR and Associate Teams
September 2023	September 2025	Data Protection Officer
September 2025	September 2027	Data Protection Officer