



BROWNEGE ST MARY'S
CATHOLIC HIGH SCHOOL
'Let your light shine'

Call Recording Policy

Signature of Chair of Governors: Mrs F Fordyce

Date: May 2026

Policy devised by: Mrs N Oddie

Date: May 2026

Review Date: May 2028

MISSION STATEMENT

Let your Light Shine

If we love others, we live in the light. 1 John 2:10

Inspired by our Gospel Values we have a shared responsibility to:-

- create an environment of welcome, love and respect for each member of our learning family.
- develop the unique gifts and talents of all, striving for excellence in everything we do.
- live out our commitment to love, service and justice in the local and global community.
- nurture the journey of faith and discovery for all.
- celebrate and reflect on the love of God, which is at the heart of all we are.

1. INTRODUCTION

This is the school's approved policy relating to the use of recording telephone calls. Brownedge St Mary's Catholic High School has a telephone system that is capable of recording telephone conversations. All external conversations may be recorded for the purposes of:

- Improving the quality of the service provided
- Identifying staff training needs and to support effective training
- Protecting staff from aggressive, abusive or nuisance calls
- Allowing authorities to appraise calls following a hoax or real threat

When an individual contacts the school, a recorded message will inform the caller that their call could be monitored and recorded so that they have the opportunity to consent by continuing with the call or hanging up.

An itemised call log will be retained of all calls made and received on our telephone network to selected telephone extensions. This will include details of the external caller's number and the date, time and the duration of the call.

The school shall ensure that the use of these recordings is fair and that the school comply with the requirements of the relevant legislation which includes:

- The Regulation of Investigatory Powers Act 2000;
- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- The Telecommunications (Data Protection and Privacy) Regulations 1999;
- The UK General Data Protection Regulation and the Data Protection Act 2018; and
- The Human Rights Act 1998.

The purpose of this policy is to ensure that all recordings are fair, proportionate and managed in line with legislation.

2. RECORDED INFORMATION

Calls may be recorded if deemed appropriate by the member of staff. The caller will be made aware that the call is being recorded. All recorded calls will be stored securely. These recordings will only be listened to if the Headteacher determines it to be necessary.

3. NOTIFICATION

All reasonable effort will be made to communicate that calls may be monitored and recorded. This will be communicated by:

- A pre-recorded message which will be played to all callers that phone the school, prior to the call being answered;
- Placing a notice on the school website.

4. STORAGE AND RETENTION OF CALL RECORDINGS

Personal data collected in the course of recording activities will be processed fairly and lawfully and in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.

Data collected will be:

- Used for the purpose(s) specified in this policy only and not used for any other purpose(s);
- Accessible only to specified and authorised staff;
- Kept confidential;
- Stored securely and
- Not kept for longer than necessary and will be securely destroyed in line with the school retention policy.

Recordings are automatically deleted from the phone system after 60 days. Specific recordings may be retained for longer if they are requested to be retrieved from the phone system within the initial 60 day period.

Recordings that are requested to be retained for longer are stored in a secure, access restricted location. Recordings stored in this area are deleted at termly intervals once they are over one year old. The only exception to this is under direct instruction from the Headteacher.

5. ACCESS TO CALL RECORDINGS

Access to call recordings is restricted to the Headteacher and Technical Support Team and those staff authorised to listen to them and will not be made more widely available.

All requests for access to specific recordings are made via the IT Help Desk. When a request is made the Headteacher is automatically notified and can approve or deny via E-mail response to the notification.

If approved, the Technical Support Department extract the recording from the phone system, add it to the secure storage area and provide the authorised staff member(s) with time-restricted access to the specific recording(s). Staff can request that specific recordings are retrieved to be held on file if they anticipate that they may be needed at a later date. If approved, the Technical Support Department extract the recording from the phone system and add it to the secure storage area. No further access to the recording is provided at this point in time.

A log is kept of all recordings that are extracted.

6. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request access to call recordings relating to themselves under the Data Protection Act. This is only possible if the telephone number that a call was made to or received from is provided. All requests should be made in writing to the Headteacher. Individuals submitting requests for

access will be asked to provide sufficient information to enable recordings relating to them to be identified. For example, date and time of call. The school reserves the right to refuse access to call recordings where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. ACCESS TO AND DISCLOSURE OF CALL RECORDINGS TO THIRD PARTIES

There will be no disclosure of recorded data to third parties other than to authorised personnel, such as the police and service providers to the school where these would reasonably need access to the data (e.g., investigators).

The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

8. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

9. COMPLAINTS

Complaints will be dealt with in accordance with the Complaints Procedure.

10. BREACHES

Any breach of this policy may result in action being taken under the Disciplinary policy.

The ICO also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk