

BMet Privacy Notice -Call Recording

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Policy Owner:	Stephen Belling
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This privacy notice explains how and for what purposes we process our call recordings. It applies to incoming voice calls to Contact Centre and Switchboard services only.

The purpose of this Notice is to ensure that our call recording processes and procedures are compliant with the Data Protection Act (DPA)/ General Data Protection Regulations (GDPR) legislation, including retention periods and the reasons for recording.

Purpose of Call Recording

Calls will be recorded and/or monitored for the purposes of:

- Training and quality purposes
- Safety and security
- The investigation of incidents
- Protect the rights and interests of the College and individuals involved

Which calls will be recorded?

All calls received to the Contact Centre and Switchboard services will be recorded.

Call recording will stop when:

- The caller has been transferred to a staff member outside of Contact Centre and Switchboard services
- The caller terminates the call
- The Contact Centre or Switchboard services staff member terminates the call

How we inform our callers that we record calls

All callers are advised, as part of the welcome message to the Contact Centre and Switchboard services that calls are recorded.

A caller may request that their call is not recorded and the caller will normally be advised to contact BMet by an alternative channel.

What Data is collected

The data collected may include:

- Call metadata (eg. Date, time and duration)
- Caller phone number
- Conversation including any personal data you provide

Who Will Access the Recording

Only authorised personnel will access or manage call recordings.

Legal Basis of Processing

Calls received by Contact Centre and Switchboard services will be recorded under the lawful basis of legitimate interests under Article 6(1)(f) of the General Data Protection Regulations. This includes ensuring service quality, protecting individuals, investigating incidents and managing safeguarding concerns.

Information Sharing and disclosure

Where there is a legitimate or lawful (including statutory) reason to do so, we may disclose call recordings to third parties including the Police and external agencies involved in safeguarding concerns.

Storage and Retention of call recordings

Calls made to the College Contact Centre and Switchboard services will be automatically recorded and saved for a maximum of 28 days upon which they will be automatically deleted.

Where safety and/or security risks are identified the recording may be downloaded and stored securely within college systems.

Any recordings which may need to be used for the purposes of an investigation, that have been downloaded, will be kept securely for as long as is deemed necessary to conduct the investigation.

Recordings constitute the personal data of both the caller and the advisor. Therefore, they will be managed in such a way that the rights of data subjects (caller and advisor) can be fulfilled, and all the obligations of the data controller (BMet) are observed.

What rights do you have?

To be informed	This Privacy Notice provides the information you are entitled to receive
Access	Please contact us if you would like confirmation that your data is being processed and access to your personal data via a Subject Access Request (SAR).
	All SARs are free of charge, however, BMet College will charge a 'reasonable fee' if a request is manifestly unfounded or excessive, particularly if it's repetitive. The fee will be based on the administrative cost of providing the information. Subject Access Request for a Data Subject Form
Rectification	Please inform us of any data which you would like rectified and we will usually respond within a month of the request.
	We will pass on the changes to any third parties who need to change their records and let you know this has been done.

Under the UK GDPR, you have the following rights:

	Data Subject Rectification Request Form
Erasure	You may exercise your right to have your personal data erased in a number of circumstances (e.g. if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Data Subject Erasure Request Form
Restrict Processing	If possible we will inform any third parties to whom your data has been disclosed of your requirement. <u>Data Subject Processing Restriction Request Form</u>
Data Portability	You can request to have the personal data transmitted directly from one controller to another, where technically feasible. Data Subject Data Portability Request Form
To Object	We may stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling). Data Subject Data Processing Objection Request Form
Not to be subject to automated decision- making including profiling	We do not use any automated decision-making.

To exercise these rights please contact the Data Protection Officer at dpo@bmet.ac.uk

Who can I complain to?

If you are dissatisfied with the way that BMet has processed your data or if you feel that we have not complied with your data protection rights, you can complain to the Data Protection Officer in the first instance <u>dpo@bmet.ac.uk</u> so that the College is provided with the opportunity to review the matter and respond to your concerns.

You can also ask the Information Commissioner's Office (ICO) to carry out an assessment to see whether it is likely or unlikely that the College has responded properly. The ICO can be contacted via the following methods:

ICO helpline (Monday-Friday 09:00 – 17:00) Telephone 0303 123 1113. You can chat online to an advisor.

You can visit their website for information on how to make a data protection complaint.

You can also write to the ICO at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Changes to This Privacy Notice

The College will keep this Privacy Notice under regular review and reserve the right to change it as necessary from time-to-time or if required by law. Any changes will be immediately posted on the website.