



Telephone Call Recording – Privacy Notice

Attain Academy Partnership (herein referred to as the 'Trust') is the Data Controller for the purpose of data protection law. The 'Trust' comprises of Bocking Primary Academy, Cressing Primary Academy, de Vere Primary Academy, Elm Hall Primary Academy, Gosfield Community Primary Academy, Newlands Spring Primary & Nursery Academy and Rayne Primary & Nursery Academy (herein referred to as the 'Academy').

This privacy notice has been written to explain how the academy use recordings of phone calls. When a call is recorded the academy collect:-

- A recording of the conversation
- Your phone number
- Date, time and duration of the call

1. Introduction

Under data protection law, individuals have a right to be informed about their personal data is processed. We comply with this right by providing privacy notices to individuals where we are processing their personal data.

Attain Academy Partnership, is the 'data controller' for the purposes of data protection law. This privacy notice explains how we collect, store and use personal data about individuals in relation to telephone calls. We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees and service providers in the performance of their duties. Please see below for details of our Data Protection Officer.

The headteacher / head of academy in each academy is responsible for ensuring that their academy complies with Trust's policies and procedures in relation to Data Protection. This policy has been written with consideration given to working practices. By adopting this policy, a reduction in workload has been facilitated by reducing the need for individual academies to interpret the policy locally.

2. Which calls does this refer to?

Incoming and outgoing telephone calls may be recorded for calls made to the academy office and/or heads of school / headteachers telephone extensions only. If you would rather your call was not recorded, then you are advised to contact the academy either in writing or by email.

3. Why are calls being recorded?

The academy has a legitimate interest in recording telephone conversations, unless those interests are overridden by you by asking for your call not to be recorded. Call recordings will be used:

- To investigate and resolve a complaint
- To help protect staff from aggressive, abusive or nuisance calls
- For the detection, investigation and prevention of crime (including fraud)
- Identify staff training needs and to support effective training

It also hopefully means employees feel more protected knowing that any threatening, intimidating or aggressive behaviour can be evidenced and acted upon where necessary.

4. How will call recordings be used?

- Complaints and disputes – Some calls are verbally resolved. In the event of a complaint or dispute, a call recording may provide additional information to investigate any allegations
- Employee safety and wellbeing – A recording may become a piece of evidence in the event of any threats being made to the individual or the academy

5. How the academy inform people that calls are recorded?

Anyone who calls the academy will hear a pre-recorded message informing them that calls are being recorded. This privacy notice also compliments the above information.

6. Who the academy might share a call recording?

The academy may be asked to share a call recording with an investigating officer in order for them to respond to a complaint or issue. The academy may be required or permitted, under Data Protection legislation, to disclose your personal data without your explicit consent, for example if there is a legal obligation to do so, such as for:

- Law enforcement
- Court proceedings
- Criminal prosecutions

7. Your rights

Where the academy process your personal data, you have a number of rights under data protection law including your right:

- Of access – you have the right to ask the academy for copies of your personal information;
- To rectification – you have the right to request the academy to rectify personal information you think is inaccurate or incomplete;
- To erasure – you have the right to request the academy erase your personal information in certain circumstances
- To restriction of processing – you have the right to object to the processing of your personal information in certain circumstances;
- To data portability – you have the right to request that the academy transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

8. How Long do the Academy Keep Telephone Recordings?

Routine telephone conversations will not be kept for longer than 180 days. However, on occasions there may be a need to keep recordings for longer, for example when further investigation is required into the matter being raised or where there has been behaviour that is abusive, offensive, threatening or has caused distress or alarm to the academy or its employees.

9. Complaints

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the academy in the first instance.

If you would like to make a complaint, please contact our Data Protection Officer (See Contact details below).

If you still have concerns following our response you have the right to raise the matter



directly with the Information Commissioner's Office:

Online	https://ico.org.uk/concerns/
Postal Address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Email	https://ico.org.uk/concerns/handling/
Phone Number	0303 123 1113

10. Contact

If you would like to discuss anything in this privacy notice or make a Subject Access Request, please contact the Data Protection officer

Data Protection Officer	Mrs Ellwood
Postal Address	Attain Academy Partnership, c/o Newlands Spring Primary and Nursery Academy, Dickens Place, Chelmsford CM1 4UU
Email	DPO@attain.essex.sch.uk

Please ensure you include the name of the Academy in all correspondence with the DPO

11. Last updated

We may need to update the privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on **4th September 2023 2022**