



Website Call Recording Notice

Version 1.1: Updated 7 February 2024

Version 1.2: Updated 20 May 2024

Newcross Healthcare Call Recording Notice

At Newcross Healthcare (hereinafter, "Newcross" or "we" or "us" or "our" or the "Organisation"), we are a dedicated healthcare services provider committed to delivering exceptional care to our community. We uphold the values of privacy, security, and transparency—pivotal in fostering trust and reliability in our relationships with patients, staff, and partners.

In exercising our responsibilities as a healthcare organization, we employ call recording technologies as part of our ongoing commitment to service excellence and operational integrity. Throughout this notice, we aim to articulate the purpose and practices behind our call recording operations clearly and transparently. This notice governs the procedures for telephone call recording conducted by Newcross Healthcare and outlines the management of, access to, and use of these recordings. By implementing this Call Recording Notice, we aim to maintain a high standard of care, ensure the effectiveness of our services, support staff training, and comply with legal and regulatory requirements, all while safeguarding the privacy and rights of our callers. As with every aspect of our operations, we handle personal data in line with the highest legal standards, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all applicable privacy legislation.

Newcross Healthcare is the data controller related to call recordings; we are responsible for your personal data related to call recordings, and we are committed to protecting and respecting your privacy throughout every interaction with our organization.

Section 2: Purpose of Call Recording

These recordings are instrumental in upholding and enhancing the high standard of care expected from us. Through the detailed analysis of call content, we can identify areas for improvement in our service offerings, ensuring that our care solutions continuously evolve to meet the dynamic needs of those we serve. Furthermore, call recordings play a crucial role in the professional development of our staff. By reviewing interactions, our team members gain valuable insights into their performance, enabling

them to refine their communication skills and empathetic engagement with service users and partners alike.

Compliance with legal and regulatory frameworks is another cornerstone of our call recording practice. By archiving conversations, we create a reliable record that aids in the adherence to and verification of compliance with healthcare standards and legal obligations. This proactive approach not only safeguards our operational integrity but also provides a layer of security for both Newcross Healthcare and our stakeholders, by establishing a verifiable audit trail in the event of disputes or inquiries.

Moreover, the strategic use of call recordings facilitates the continuous improvement of our customer service and operational processes. By analyzing calls, we can pinpoint inefficiencies, adapt our strategies to better meet caller needs, and streamline our operational workflows to enhance overall efficiency and responsiveness. In essence, call recording is a vital tool in our mission to deliver exceptional healthcare services, fostering an environment of trust and reliability through transparency, regulatory compliance, and a steadfast commitment to improving patient care and satisfaction.

Section 3: Legal Basis for Call Recording

The legal grounds for recording calls at Newcross Healthcare are based on legitimate interests and explicit consent.

Firstly, Newcross Healthcare relies on the legitimate interest for call recording when such activities are necessary to enhance the quality of care, ensure the security of our operations, and protect the interests of our patients and staff. In these instances, our commitment to transparency and privacy is reflected in our careful consideration of the balance between our legitimate interests and the rights and freedoms of the individuals involved. We ensure that individuals are informed about the recording of calls, the purposes behind it, and their rights in relation to their personal data, thereby upholding the principles of fairness and transparency.

Secondly, Newcross Healthcare acknowledges the importance of explicit consent with call recordings. The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 is a UK-specific regulation that permits businesses to record calls for specific reasons, including proving that a business transaction took place or ensuring the business complies with its regulatory procedures. When doing this, businesses are still required to make “every reasonable effort” to inform parties that they are being recorded, and in this effort, Newcross informs callers when they are being recorded, both for outbound calls as well as inbound calls.

In summary, the legal underpinnings of our call recording practices are designed to ensure that Newcross Healthcare not only complies with but exceeds the requirements set forth by the UK GDPR, the Data Protection Act 2018, and the Telecommunications

Regulations 2000. By adhering to these legal standards, we reinforce our commitment to operational excellence, privacy, and the protection of personal data, thereby fostering an environment of trust and respect with our patients, staff, and partners.

Section 4: How Call Recordings are Managed

Call recordings are securely stored employing robust security measures, including encryption and access controls, to prevent unauthorized access and ensure that the data remains intact and confidential. Access to call recordings is strictly limited to authorized personnel within Newcross Healthcare who require this information to perform their duties effectively. This may include members of our quality assurance team, who review calls for training and service improvement purposes, and our compliance staff, who ensure that our practices align with legal and regulatory standards.

The duration for which we retain call recordings is set to six months, though some calls may be selected for longer for training purposes or during investigatory situations. This retention policy ensures that recordings are kept only as long as necessary to fulfill their intended purposes or to comply with legal obligations. Once the retention period expires, recordings are securely deleted from our systems, ensuring that personal data is not held indefinitely.

In safeguarding the recordings, Newcross Healthcare adheres to the principles of data minimization and privacy by design. This means that we continuously evaluate our data handling practices, ensuring they are necessary for the provision of our services and that privacy considerations are integrated into the development of our recording technologies and processes.

Section 5: Access to Call Recordings

Newcross Healthcare recognizes the importance of transparency and individual rights in relation to personal data, including data captured in call recordings. In line with our commitment to uphold these principles, we have established clear procedures for granting access to call recordings, ensuring that such access is governed by strict protocols to protect the privacy and security of the information contained within.

Access to call recordings within Newcross Healthcare is controlled and is granted only to authorized personnel who need the information to perform their job functions. This includes individuals involved in quality assurance, customer service improvement, compliance, and, where necessary, dispute resolution. These team members are trained in data protection and privacy policies to ensure that any access to or handling of call recordings is conducted in accordance with legal standards and organizational policies.

In certain circumstances, call recordings may be shared with third parties, such as legal advisors, auditors or regulatory authorities, when it is required for compliance with legal obligations, the protection of vital interests, or the establishment, exercise, or defense of legal claims. Any sharing of call recordings with third parties is conducted under strict contractual arrangements that ensure the confidentiality and security of the data, in full compliance with applicable data protection laws.

Individuals whose calls have been recorded have the right to access their personal data, subject to certain conditions and exemptions under the UK GDPR and the Data Protection Act 2018. Requests for access to call recordings can be made formally to the DPO of Newcross Healthcare. Upon receiving a request, we will verify the identity of the requester to protect the privacy and security of the personal data. We then assess the request in accordance with our data protection policies and legal obligations, ensuring that any disclosure of call recordings is carried out lawfully and securely.

If an individual believes that their personal data has been inaccurately captured in a call recording, they have the right to request correction of the data. Furthermore, under certain conditions, individuals may also have the right to request the deletion of call recordings, especially when the data is no longer necessary for the purposes for which it was collected or when consent is withdrawn and there is no other legal ground for processing.

Newcross Healthcare is dedicated to facilitating the exercise of these rights efficiently and transparently, providing individuals with the means to control their personal data while ensuring that our call recording practices remain compliant and respectful of privacy considerations.

Section 6: Your Rights Under the GDPR

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, individuals have specific rights concerning their personal data. Newcross Healthcare is committed to ensuring that these rights are fully respected and facilitated within the context of our call recording practices. Understanding these rights is crucial for our patients, staff, and partners, as it empowers them to exercise control over their personal information.

- **Right to Access:** Individuals have the right to request access to their personal data, including any call recordings in which they are involved. This enables them to understand how and why their data is being used, and to verify the lawfulness of the processing.
- **Right to Rectification:** If personal data is inaccurate or incomplete, individuals have the right to have it corrected. This ensures that all information held by

Newcross Healthcare, including that contained in call recordings, is accurate and up to date.

- **Right to Erasure ('Right to be Forgotten')**: Under certain conditions, individuals can request the deletion or removal of personal data where there is no compelling reason for its continued processing. This might apply to call recordings that are no longer necessary for the purpose they were collected for.
- **Right to Restrict Processing**: Individuals have the right to 'block' or suppress processing of their personal data. When processing is restricted, Newcross Healthcare is permitted to store the personal data, but not to process it further.
- **Right to Data Portability**: This right allows individuals to obtain and reuse their personal data for their own purposes across different services. It applies to personal data provided by the individuals, which is processed based on consent or under a contract.
- **Right to Object**: Individuals have the right to object to the processing of their personal data in certain circumstances, including processing for direct marketing, processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, and processing for purposes of scientific/historical research and statistics.
- **Rights Related to Automated Decision Making and Profiling**: The GDPR provides safeguards for individuals against the risk that a potentially damaging decision is made without human intervention. Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

Newcross Healthcare ensures that all requests to exercise these rights are responded to promptly and in accordance with the GDPR. Procedures are in place to enable individuals to make requests easily and to ensure that their rights are observed without undue delay or expense.

We encourage anyone wishing to exercise their rights or seeking clarification on how their personal data is handled by Newcross Healthcare to contact our Data Protection Officer. Our organization provides clarity and support throughout the process, ensuring that your data protection rights are fully respected and upheld.

Section 7: Changes to the Call Recording Notice

Newcross Healthcare is committed to maintaining the highest standards of privacy and data protection, which includes keeping our policies, including this Call Recording Notice, up to date with legal requirements, industry standards, and organizational practices. To reflect the dynamic nature of data protection legislation and the evolving landscape of healthcare service delivery, this notice may undergo periodic revisions.

Whenever significant updates are made to this notice, we will take appropriate steps to inform individuals affected by the changes. This may include direct communication through email or notifications on our website, ensuring that those impacted are aware of the modifications and understand their implications. The most current version of the Call Recording Notice will always be accessible on our website, providing transparency and ease of access for all stakeholders.

Changes to this notice may arise from numerous factors, including legislative amendments, guidance from data protection authorities, changes in our operational processes, or technological advancements in call recording practices. Our goal in updating the notice is to enhance clarity, strengthen data protection measures, and ensure compliance with applicable laws, thereby reinforcing trust and confidence in our commitment to privacy and security.

We encourage our patients, staff, partners, and other stakeholders to review this notice periodically to stay informed about how we manage call recordings and protect personal data. Your continued interaction with Newcross Healthcare following the posting of changes to this notice will indicate your acceptance of those changes.

For any inquiries or concerns about this Call Recording Notice or our data protection practices, please contact our Data Protection Officer. We provide the necessary support and guidance to ensure your data protection rights are fully respected and upheld.

Section 8: Contact Information

Ensuring transparent communication and facilitating easy access to information about data protection practices is paramount to Newcross Healthcare. Should you have any questions, concerns, or requests related to our Call Recording Notice, or more broadly, our handling of personal data, we encourage you to contact our Data Protection Officer (DPO).

Our DPO plays a crucial role in overseeing data protection strategies and compliance within Newcross Healthcare. They are available to provide clarity on how your personal data is processed, assist with requests to exercise your data protection rights, and address any concerns you may have regarding privacy and data security.

To contact our Data Protection Officer, please send an email to dpo@newcrosshealthcare.com. You may also send your correspondence via post to the following address:

Data Protection Office, Newcross Healthcare Solutions Ltd, Waterside, Berry Pomeroy, Totnes, Devon, TQ9 6LH

We ensure that all inquiries received are handled with the utmost care and attention, reflecting our commitment to your privacy and data protection rights. Our DPO is

equipped to offer guidance, support, and responses to your data protection queries, ensuring that your interactions with Newcross Healthcare are both positive and secure.

We also welcome feedback on our data protection practices and this Call Recording Notice. Your insights and perspectives are valuable to us in our continuous efforts to enhance our data protection measures and service quality. Newcross Healthcare is dedicated to maintaining an open, responsive, and transparent dialogue with all our stakeholders, ensuring that we remain a trusted and reliable healthcare services provider.

For further information, including updates to our policies or practices, please visit our website. Our online resources are designed to provide comprehensive details about our data protection efforts and how we safeguard the personal data of our patients, staff, and partners.