

## Greenshaw Learning Trust Telephone Recording Notice

This statement provides information on the use of telephone recording within the Greenshaw Learning Trust (GLT) and its schools, in line with the GLT Information, Data and Cyber Security Policy. It applies to all schools across GLT.

### Purpose of Telephone Recording

We record telephone conversations based on a legitimate interest to ensure quality, safety, and compliance, unless an individual's rights override this interest (you may ask for your call not to be recorded).

What we collect:

- A recording of the telephone conversation where you use inappropriate or abusive behaviour
- Your phone number
- Date, time and duration of the call.

How we collect and use telephone recordings:

The school has a legitimate interest under UK GDPR Article 6(1)(f) to record incoming telephone calls made to their mainlines, where a caller uses inappropriate or abusive behaviour. If you do not wish for your call to be recorded for this reason, then we would recommend you use alternative means of communication and not engage in appropriate or abusive behaviour towards our staff. Call recordings will be used:

- To prevent abusive, threatening or inappropriate behaviour towards staff. A recording may provide evidence in the event of any threats being made to an individual, school or Trust.
- To support conflict resolution, help ensure staff are treated appropriately, and provide an accurate record of communications in the event of misunderstandings or disputes.
- In the event of a complaint, a call recording may provide additional information to investigate and resolve the complaint.
- Identify staff training needs and to support effective training.

Our lawful basis for recording telephone calls is legitimate interest (UK GDPR Article 6(1)(f)).

**How recordings are used:**

- **Complaints and disputes:** Recordings provide additional information to investigate any allegations in the event of a formal complaint or dispute.

- **Employee safety and well-being:** A recording may be used as evidence if any threats are made to an individual or the school.

#### **Who we might share recordings with:**

Recordings may be shared with an investigating officer to assist them in responding to a complaint or issue. The school may also be required or permitted under Data Protection legislation to disclose your personal data without your explicit consent for legal obligations, such as:

- Law enforcement
- Court proceedings
- Criminal prosecutions
- Regulatory bodies

#### **Requesting Access to Your Personal Data**

Where your call has been recorded you can make a request for your personal information. Please contact the school office.

Depending on the lawful basis used for processing data (as identified above), you may also have other rights as per the UK GDPR.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance, with our Data Protection Officer which is SchoolPro TLC Ltd via [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk), or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

#### **Your Rights and Complaints**

Under data protection law, you have a number of rights regarding your personal data. These rights include:

Where we process your personal data, you have a number of rights under the Data Protection Act 2018, including:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- - the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'

- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.

### **Data Controller Information**

If you have any concerns about our collection or use of personal information, or any other concern about our data processing, please raise this with the school in the first instance. The name of the Data Protection Lead for the school can be found on the school website.

The Greenshaw Learning Trust is the Data Controller for the personal data processed through telephone recordings. You can contact the Data Controller at:

**Data Protection Officer:** SchoolPro TLC

**Email:** [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk)

**Web:** [www.schoolpro.uk](http://www.schoolpro.uk)

## Greenshaw Learning Trust - School-Specific Telephone Recording Compliance Form

### School Information

Field	School Specific Details
<b>School Name</b>	Scott Medical and Healthcare College
<b>Name and contact details of School Data Protection Lead</b> <i>Who should be contacted with any queries</i>	Rob Bromidge ( <a href="mailto:rbromidge@sdcc-smhc.net">rbromidge@sdcc-smhc.net</a> ) Louise Wooller ( <a href="mailto:lwooller@sdcc-smhc.net">lwooller@sdcc-smhc.net</a> )
<b>Date Completed</b> <i>This form will be reviewed annually.</i>	12 March 2026

### Telephone System and Recording Details

Question	School's Specific Details
<b>Telephone System/Provider</b>	Gradwell Communications, 3CX system.
<b>Which telephone lines are recorded?</b>	All the telephone lines are recorded as default, but can be switched off using the browser 3CX client. The client is accessible from the Cloud desktop, which is also available to all Staff.
<b>Where are the call recordings physically stored?</b>	Short-term locally on a 3CX storage box, then archived on Gradwells Servers.
<b>What are the security measures in place to protect the recordings?</b>	Access to the Admin console is very limited to IT admins only, password and 2FA are required to access. Current IT Admins are Rob Bromidge and Adam Church.

### Communication and Transparency

Question	School's Specific Details
<b>How does the school inform people that calls are recorded?</b>	Mandatory automated message when a caller calls the main school number, no message when a call is made to a direct staff number.
<b>What is the procedure for a caller who requests their call is NOT recorded?</b>	The member of staff can disable the call recording via the 3CX Client.

**Access, Use, and Retention**

Question	School's Specific Details
<b>Who has authorised access to the telephone recordings?</b>	Any requests from staff for recordings have to be passed through SMT to obtain authorized access to the audio files.
<b>How long does the school retain the telephone recordings?</b>	Estimate 12 months, but it replaces old files as the storage runs low.
<b>What is the procedure for secure deletion/destruction of recordings?</b>	The files are deleted from the Archive when the memory is low.