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 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, 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
Web: www.schoolpro.uk

Greenshaw Learning Trust - School-Specific Telephone Recording Compliance Form

School Information

Field	School Specific Details
School Name	Holmleigh Park High School
Name and contact details of School Data Protection Lead *Who should be contacted with any queries*	Armel Guennec, a.guennec@hphigh.co.uk
Date Completed *This form will be reviewed annually.*	09/11/2026

Telephone System and Recording Details

Question	School's Specific Details
Telephone System/Provider	3CX
Which telephone lines are recorded?	The reception line : 01452 301 381
Where are the call recordings physically stored?	Secure, encrypted, Google Storage location (Cloud)
What are the security measures in place to protect the recordings?	Full encryption. Only a few selected users have credentials to access the storage, through strong password + MFA.

Communication and Transparency

Question	School's Specific Details
How does the school inform people that calls are recorded?	Mandatory automated message at the start of the digital receptionist.
What is the procedure for a caller who requests their call is NOT recorded?	Recording is compulsory and automatic on the main reception line.

Access, Use, and Retention

Question	School's Specific Details
Who has authorised access to the telephone recordings?	Users authorised to request are Headteacher (D.Hudson) and SLT. Access to the cloud storage : The IT Services team (Armel Guennec, Oliver Baxter-Smith, Joe Anderton)
How long does the school retain the telephone recordings?	Recordings are automatically deleted after7 days in line with the GLT Guidance. Recordings related to a formal complaint are kept until after the complaint is resolved. If this is longer than 90 days the recordings will be deleted immediately on resolution of the complaint.
What is the procedure for secure deletion/destruction of recordings?	Automatic deletion on expiry.