

## Transparency Notice - Telephone System (X-on – Surgery Connect)

### Purpose of Processing

St Thomas Medical Group is moving to a new telephone supplier from May 2022.

It is hoped that the change in suppliers will improve the patient experience and allow the administration teams to monitor wait times and ensure the call is routed to the correct team.

The telephone system is integrated into our clinical system (EMIS) and will use the caller ID to search for the patient record. Where the phone number appears on multiple records, the telephone system will ask the caller for their birth month to positively identify the patient. This data is not retained by X-on.

Calls to/from our admin teams may be recorded for training or monitoring purposes and if needed to assist in the investigation of a complaint. We will not record calls made between a clinician and a patient.

### Legal basis for processing

Under the GDPR our legal bases for processing are:

Article 6 (1) (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person.

Article 6 (1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Article 9(2)(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in [paragraph 3](#).

### Categories of Personal Data

Biometric data  
Health data

Call recordings will be paused when payments are taken over the telephone.

### Right of Access

Under the current Data Protection legislation, you have a 'Right of Access', this means that you can make a Subject Access Request to receive copies of telephone recordings.

We reserve the right to withhold information where permissible by the UK General Data Protection Regulation (GDPR) 2018 and we will not be able to release the information to you if:

- We no longer have a copy of the requested data
- The request is manifestly unfounded
- The request is manifestly excessive

For more information, please see: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/right-of-access/when-can-we-refuse-to-comply-with-a-request/#:~:text=Yes.%20If%20an%20exemption%20applies%2C%20you%20can%20refuse,see%20how%20it%20applies%20to%20a%20particular%20request.?msclkid=4b49ddcdf9311ec912bf42fe2a31968>

Requests should be directed to [stthomas@nhs.net](mailto:stthomas@nhs.net) for the attention of the Data Protection Officer. Please include your full name and address along with some photographic ID. It would also help to include

### **Data Sharing**

Data will not be shared.

### **Data Retention & Storage**

Call recordings will be encrypted at rest and are accessed through secure encrypted connections, via password-controlled access.

Data is held in UK data centres.

Calls will be retained for 36 months after which they will be deleted.