



Parliamentary
and Health Service
Ombudsman

Casework Voice Call Recording

Data Protection & Security Policy

Version 1.4 | February 2026

1 Purpose

- 1.1 This policy considers how to protect the information rights of the people we work with and for, whilst enabling PHSO to deliver value for money and quality complaint handling.
- 1.2 The aim of this policy is to provide clear guidance on when and how we record calls and how we handle the information and data generated by those calls.

2 Principles

- 2.1 PHSO has a long term ambition to record all telephone calls in which complaints are discussed. However, due to difficulties identifying these calls, each type of call e.g., from whom to whom, each class of telephone call will need to be risk assessed, documented and recording approved. At a minimum, PHSO will regard all calls made to and from caseworkers as concerning complaints.
- 2.2 PHSO considers all voice calls between PHSO and complainants or their proxies to be within scope of this policy regardless of technology. Therefore, this policy includes telephone calls that direct dial, initiated via the CMS or from Teams. At present, only calls between Intake caseworkers and complainants/potential complainants are recorded.
- 2.3 PHSO will maximise opportunities to make use of the data we collect to ensure that we are delivering on our statutory roles to handle complaints and improve public services.
- 2.4 PHSO will be upfront and transparent about how we record and derive data from telephone calls. We will always provide people with information on our website and via a recorded message so that members of the public and others can choose whether to proceed or not.
- 2.5 We will not turn off recording on request of a complainant or their proxies. This is to ensure that we include all calls in our quality monitoring, protect staff from verbal abuse and harassment and ensure that the integrity of our call recording data sets.
- 2.6 We will respond to UK GDPR requests to erase or restrict how we use personal information. We will use this mechanism to ensure data protection rights are upheld whilst enabling recording of calls.
- 2.7 Video recording is excluded as of the time this policy was agreed.

3 Audio privacy notices

3.1 Call recording is permitted only when all parties to the call are aware that the call is being recorded and have been made aware of their rights. This includes people who work for PHSO, complainants, their advocates, and other parties. This use of audio privacy notices is in addition to the standard privacy notice available on PHSO’s website.

4 In Scope

- 4.1 This policy applies to calls made to and from individuals employed within casework at PHSO.
- 4.2 This policy covers telephone calls. A telephone call has multiple components such as audio files, timestamps, and voice prints for example.
- 4.3 This policy also includes transcripts. The call itself can be automatically transcribed to create a text record which in turn can be mined to derive useful data about calls as shown in the image below.

Figure 1 Diagram showing data produced by or derivable from telephony



- 4.4 We will transcribe all calls in scope using automated tools which may include machine learning. These transcripts will be retained in two forms as follows:

Personal information

- Transcripts may be attached to complaint files in place of telephony notes in addition to the call's audio recording. Caseworkers may append further notes if appropriate. Transcripts and recordings attached to a complaint record will be treated as casework information and retained according to PHSO's retention policy.

Anonymisation and pseudonymisation

- Transcript data will be pseudonymised to create a canon of transcription data at an appropriate level of granularity that balances the risk of re-deidentification against the usability of the data as an intelligence source.

Example of using transcripts as a data source

PHSO receives 20 calls to Intake on one day, concerning maternity case, A&E, oncology, and GP prescriptions. In each call the complainant mentioned pain relief. PHSO uses machine learning to interrogate the transcripts and the frequency of pain management in complaints is identified.



PHSO begins a systemic investigation into pain management in the NHS.

5 Information and security governance requirements

- 5.1 Transcripts and call audio recordings attributable to an individual's complaint and hence, personal data, must only be stored within PHSO's complaint management systems. Calls that identify an individual that are not linked to a complaint will be kept separately in accordance with the PHSO retention policy.
- 5.2 The security and data protection compliance of telephony, call recording and any automated processing thereof must be reviewed annually. The data protection impact assessment must be reviewed at this point or when a significant change is made.
- 5.3 There must be an audit trail of all uses of personal data including:
- A manager listening to a call for training or quality management purposes.
 - A security officer reviewing a call for abusive or threatening behavior.
 - A caseworker listening to a call for complaints handling purposes.

This is not an exclusive list. These audit logs must be retained as per PHSO's retention policy.

- 5.4 Call recordings (audio files) must not be downloaded from the case management system / complaint file except when an audio file is required to meet a legislative requirement such as a subject access request or as evidence in a legal or criminal matter.

6 Retention

- 6.1 Call recordings, transcripts and other personal information derived from call recordings and linked to a complaint will be kept for six years from the date of the last activity on the case. This includes personal data held within the data warehouse. Call recordings not linked to a complaint will be retained for 30 days whilst the call transcript will be kept for two years from the date of collection this includes the same data in the data warehouse. This parity with casework retention is intended to facilitate managing information rights, ensuring that PHSO can track back to individuals if needed and to maintain a complete information repository if required.

7 Out of scope

- 7.1 There will be no automated processing under Section 22 UK GDPR. Automated processing in this context is about using algorithms to make decisions about an individual.

8 Roles and responsibilities

- 8.1 The Director of Operations is accountable for ensuring that all parties to recorded calls are made aware of the recording of calls at the earliest possible opportunity. Compliance will be monitored by the Privacy team through spot checks and audits.
- 8.2 Managers of staff whose calls may be recorded must ensure that members of staff understand their data protection rights and that they are entitled to make GDPR requests.
- 8.3 All staff must be able to recognise and forward an information rights request to ensure that the information rights team can log and respond to requests within statutory timescales.
- 8.4 Permissions to download audio files from the case management system will be restricted to authorised information rights, privacy, and security specialists.

9 Definitions

Call: a voice, audio or video communication including direct dialed telephone calls, teams or call or other audio/visual real time interaction.

Case Management System: the solution that PHSO uses to track and manage complaints comprising of both Microsoft Dynamics (MSD) and SharePoint Online (SPO) and other M365 components such as Exchange.

Contact: when an individual communicates with PHSO which may be about matters other than a complaint or before a complaint can be made.

Complaint: a case where PHSO has accepted the need to investigate allegations of maladministration against an organisation we investigate

Transcript: the artefact generated when call recording content is transcribed into text

10 Policy information

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Related policies and guidance:

- [Public Privacy Notice](#)
- [Employee Privacy Notice](#)
- [Retention Schedule](#)

11 Version control

Date	Version	Changes	Changed by	Agreed by
20/7/22	Draft 0.4	Added ability to record AJ outbound, responsibility with Dir Ops, retention	AJ/PH	CW, AJ, KB, GK
31/7/22	Draft 0.5	Comments from █████ █████, explanations made, request made by PH for ICT staff who are admins to be able to download audio files	PH	
1/8/22	1	Finalised following discussion with SO, clarified scope and what we mean by 'call' and 'CMS'	SO, AJ	SIRG agreed 20/7/22 subject to resolving any outstanding non-substantial issues
3/3/23	1.1	Update to Retention and Deletion	AD	AJ
16/10/24	1.2	Updates to 2.1	AD	AJ
19/12/24	1.3	Updates to account for changes in call recording retention	AD	SIRG approved updates 7/2/25 for March publication
02/02/2026	1.4	Minor updates to reflect changes to casework retention periods	AD	AD