



WEST LIMERICK INDEPENDENT LIVING CLG

Telephone Call Recording Policy

Policy Reference	WLILP61
Category	Operational Policies — Data Protection
Version	2.0 (ePrivacy Regulations and legal basis added, cross-references corrected)
Status	APPROVED — by the Board of Directors on 9 October 2026
Supersedes	WLILP61 - Telephone Call Recording Policy - DRAFT v1
Policy Owner	Board of Directors, West Limerick Independent Living CLG
Applies To	All employees, Personal Assistants, Coordinators, Managers and authorised personnel
Related Policies	WLILP5 - Code of Standards, Conduct and Professional Behaviour; WLILP7A - Data Protection Policy; WLILP7C - Data Access Policy; WLILP7D - Data Retention, Rectification and Erasure Policy; WLILP8 - Safeguarding Vulnerable Persons at Risk of Abuse Policy; WLILP53 - Complaints Policy; Employee Handbook; Privacy Notice (Employees); Privacy Notice (Service Users); Service Agreement / Service User Agreement
Review Cycle	In accordance with WLIL's policy review programme, or sooner where legislative, regulatory or operational changes require it

1. Purpose

West Limerick Independent Living CLG records telephone calls to support the safe, effective and accountable delivery of services.

Telephone recordings assist the organisation to:

- maintain accurate records of significant communications;
- support continuity of service delivery;
- clarify instructions or information provided by callers;
- investigate complaints, incidents and safeguarding concerns;
- protect service users, employees and the organisation where disputes arise; and



- meet legal, regulatory and governance requirements.

This policy explains how telephone recordings are managed while supporting compliance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018, the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (S.I. No. 336/2011), which specifically governs the confidentiality and recording of telephone communications in Ireland, and the organisation's WLILP7A - Data Protection Policy.

2. Scope

This policy applies to telephone calls made or received using organisational telephone systems, including:

- office telephones;
- approved mobile telephones used for organisational business; and
- any future telephone systems that include call recording.

It applies to calls involving:

- service users;
- family members and representatives;
- Personal Assistants;
- employees;
- healthcare professionals;
- statutory agencies;
- suppliers and contractors; and
- any other person conducting business with the organisation.

3. Why Calls Are Recorded

Telephone calls may be recorded where there is a legitimate organisational purpose, including:

- coordinating and delivering services;
- confirming care arrangements and service instructions;
- supporting business continuity;
- maintaining accurate records of important communications;
- investigating complaints;



- investigating incidents;
- supporting safeguarding enquiries;
- resolving disputes or misunderstandings;
- supporting legal or regulatory requirements; and
- protecting the safety of service users, employees and the organisation.

Telephone recordings will only be used for legitimate organisational purposes and will not be used for purposes unrelated to the reason for which they were recorded.

The legal basis for this processing is legitimate interests under GDPR Article 6(1)(f) — coordinating service delivery, maintaining accurate records, and protecting service users, employees and the organisation. Where a recorded call with a service user or their representative discusses health, care needs, or a safeguarding concern, this constitutes special category data under GDPR Article 9, and processing relies additionally on Article 9(2)(h) (provision of health or social care), consistent with WLILP7A - Data Protection Policy.

4. Notification to Callers

GDPR's transparency requirements mean callers should normally be informed at the point a call may be recorded, not only through documents they may never have seen. Where the telephone system supports it, callers will be informed that telephone calls may be recorded through an automated telephone message. Where a system does not yet support this, WLIL should prioritise adding it, since notification through Privacy Notices and Service Agreements alone is unlikely to be sufficient transparency for a caller who has not previously seen those documents.

Information regarding telephone recording is also provided through the organisation's Privacy Notices, Service Agreements and other relevant documentation.

Employees are not required to provide a verbal recording notification at the beginning of every outgoing telephone call unless specifically instructed to do so or where required by law.

5. Confidentiality During Telephone Calls

All employees are responsible for protecting confidential information during telephone conversations.

Employees must:



- verify the identity of callers before discussing confidential information where appropriate;
- avoid discussing confidential information where conversations may be overheard;
- ensure speakerphone is used only where appropriate;
- limit voicemail messages to the minimum information necessary;
- maintain service user confidentiality at all times; and
- comply with the Staff Code of Conduct and Data Protection Policy.

6. Storage and Security

Telephone recordings are confidential organisational records.

Recordings will be stored securely using approved organisational systems with appropriate technical and organisational safeguards.

Access will be restricted to authorised personnel who require access as part of their role.

Unauthorised copying, downloading, sharing or disclosure of recordings is strictly prohibited.

7. Access to Recordings

Access to telephone recordings may be granted only where there is a legitimate business requirement.

This may include:

- Senior Management;
- Service Coordinators;
- personnel responsible for complaints, safeguarding or compliance;
- authorised personnel dealing with legal or regulatory matters; and
- other authorised persons approved by management where appropriate.

Access will be limited to the minimum necessary for the purpose involved.

8. Use of Telephone Recordings

Telephone recordings may be used to:

- clarify communications;
- verify information or instructions;



- investigate complaints;
- investigate incidents;
- support safeguarding investigations;
- assist internal reviews;
- respond to legal or regulatory requests; and
- provide evidence where appropriate.

Telephone recordings support organisational records but do not replace the requirement for employees to complete case notes, service records, incident reports or any other required documentation.

9. Unauthorised Recording

Employees must not:

- use personal mobile telephones or personal recording devices to record work-related telephone conversations;
- use personal applications to record organisational calls;
- make unauthorised copies of recordings;
- remove recordings from organisational systems; or
- disclose recordings without appropriate authorisation.

Any unauthorised recording or disclosure may result in disciplinary action.

10. Staff Responsibilities

All employees are responsible for:

- understanding this policy;
- protecting confidential information;
- using recordings only for authorised purposes;
- maintaining secure access credentials;
- reporting any suspected misuse or unauthorised access immediately; and
- complying with all related organisational policies.

11. Retention



Telephone recordings will be retained only for as long as necessary and in accordance with the organisation's Data Retention Policy and any applicable legal or regulatory requirements.

Recordings that are no longer required will be securely deleted.

12. Requests for Access

Requests for access to telephone recordings will be managed in accordance with the organisation's Subject Access Request (SAR) Procedure and Data Protection Policy.

Where recordings contain information relating to more than one individual, the rights of all parties will be considered before any disclosure is made.

13. Complaints, Safeguarding and Legal Proceedings

Telephone recordings may be reviewed where necessary to:

- investigate complaints;
- investigate safeguarding concerns;
- investigate incidents;
- support disciplinary or grievance procedures where appropriate;
- comply with legal obligations; or
- respond to requests from An Garda Síochána, the courts, regulators or other authorised bodies where required by law.

14. Monitoring and Compliance

The organisation may monitor access to telephone recordings to ensure compliance with this policy.

Unauthorised access or misuse may result in disciplinary action and, where appropriate, referral to the relevant statutory or regulatory authority.

15. Related Policies

This policy should be read in conjunction with the organisation's:

- Employee Handbook;



- WLILP7A - Data Protection Policy;
- Privacy Notices;
- Service Agreement;
- WLILP5 - Code of Standards, Conduct and Professional Behaviour;
- WLILP7D - Data Retention, Rectification and Erasure Policy;
- WLILP7C - Data Access Policy;
- WLILP53 - Complaints Policy; and
- WLILP8 - Safeguarding Vulnerable Persons at Risk of Abuse Policy.

16. Policy Review

This policy will be reviewed in accordance with the organisation's policy review programme or sooner where required by legislative, regulatory or operational changes.

Approval

Approved by the Board of West Limerick Independent Living CLG on 9 October 2026.

Signed on behalf of the Board, on its instruction, by the General Manager:

Margaret O'Brien O'Connor, General Manager

Date signed: 09-10-2026