

Privacy Notice for Telephone Call Recording



23/03/2026

Introduction

1 This Privacy Notice applies to Bath Spa University enquirers, applicants, students, staff, and other parties that may phone the University. Bath Spa University (the **University**) is a public university which has its main campus at Newton Park, Newton St Loe, Bath, BA2 9BN.

2 We are committed to safeguarding the privacy of our callers; this Notice sets out how we will treat your personal information when you call us via telephone. We are the data controller which means we are responsible for deciding how we collect and use your personal information.

3 Please see the [policy section of our website](#) to access our full Data Protection Policy and our further privacy notices (including privacy information for our website users).

What data do we hold?

4 You will be informed at the start of the call if the conversation is being recorded. We collect and process call recordings and follow up information from you for the purposes described below, including quality and assurance . This includes:

- a voice recording of a phone call to or from a university number.

Why do we process your personal data, and what is the legal basis for that processing?

5 The legal basis we are relying on for collecting and processing the information for each of the purposes is as follows:

PURPOSE OF COLLECTING INFORMATION	LEGAL BASIS FOR PROCESSING INFORMATION
Legitimate Interest	Processing is necessary for the University’s legitimate interests in ensuring accurate information is provided, supporting training and development, investigating complaints, and maintaining a record of interactions where appropriate.
Vital Interests	Should a caller identify they are in danger, or they have put others in danger, then we would share the call recording with whoever is appropriate including those requirement to provide an emergency response.

Who has access to your personal data?

6 Your personal data will only be shared internally or to third parties who have been appointed by the University to provide a specific service on behalf of the University in connection with university-based enquiries, including IT support. Access to call recordings is strictly limited to authorised staff such as line managers, supervisors, Quality Assurance staff, IT system administrators, complaints investigators. Access is logged and monitored, and recordings cannot be downloaded or shared outside of approved processes.

7 We will share your personal data with third parties where required by law, where it is necessary to administer the University's relationship with you in connection with telephone calls or where we have another legitimate interest in doing so.

8 We may also share your personal data with third parties if we have a legal obligation to do so.

9 We may share your personal data with third party service providers who act on our behalf such as IT services providers and our professional advisers. Where it is necessary to do so, we may need to share your information with them, so that they can carry out the services we have requested.

Transfer of Data to Other Countries

10 Occasionally the University may be required to share your personal data with organisations either based in the UK/European Union (EU), or in countries outside the EU that have equivalent levels of protection. These transfers of data are usually necessary in order to meet contractual responsibilities with you and would only happen once we were assured that the appropriate safeguards were in place.

Information Security and Retention Period

11 Your personal data is collected and stored in line with relevant Data Protection law, and is stored securely using processes and systems that comply with the University's strict information security and Data Protection principles.

12 We will only keep the information that you provide for as long as is necessary for the purpose for which it is processed and in accordance with relevant legislation. This is because we have chosen the shortest period to allow time to review for quality and training. We will then dispose of your information within 28days unless this period needs to be extended e.g. for a specific investigation or complaint.

Automated Decision Making

13 Information collected will not be used for automated decision-making or profiling individuals.¹

Your rights

14 You have various rights in relation to your information, including:

14.1 The right to access the information we hold;

14.2 The right to request rectification or erasure of the information that we hold;

14.3 The right to request that we restrict what we are doing with your information;

14.4 The right to object to what we are doing; and

14.5 The right to request your information in a portable format.

15 Please note that some of these rights may not apply to the information that we hold about you, and we may need to collect some form of proof of identity before acting on your request.

16 Where call recordings contain the personal data of multiple individuals, we may need to take steps to protect third-party privacy when responding to access requests.

17 Where we have relied upon your consent to process your information, you also have the right to withdraw your consent at any time.

18 If you would like to exercise any of these rights, or have any other questions about this Notice, please contact the University's Information Governance Team at data-protection@bathspa.ac.uk.

19 You also have the right to make a complaint to the Information Commissioner's Office about how we use your information, although we would ask that you get in touch with us first in order that we can try to put things right. How to contact the Information Commissioner's Office can be found at <https://ico.org.uk/concerns/>.