



ODST
Oxford Diocesan
Schools Trust

Bampton CE Primary School and Nursery

Learning together with Respect, Friendship and Perseverance



School Vision Statement

We endeavour to enable all individuals in our school community to learn together, grow in respect, tolerance and understanding of the world in which we live and embrace Christian values, to be the best that we can be.

Title of Policy	Recording Meetings Policy
Date Adopted by the Governing Body	May 2022
Review Date	May 2025
Signed by the Chair of Governors	

RECORDING MEETINGS POLICY

Safeguarding related

1	Central policy: trust-wide, applicable at Trust and school levels and therefore provided at ODST central level.
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Original document	Estates, Health & Safety Committee	14 Mar 2019	Version 1
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1. INTRODUCTION

- 1.1 This policy is intended to provide clarity for users to our academies, employees of the Trust, governors, Trustees and other stakeholders, around the circumstances in which meetings may be recorded by ODST, by our users or by partner agencies.

2. BACKGROUND AND CONTEXT

- 2.1 There will be occasions when users, as highlighted above, may want to video or audio record a meeting that takes place because other means of recording, such as note-taking, are either unavailable to them or considered to be insufficiently reliable for their purposes. A policy is necessary because there have been requests to record meetings and sophisticated recording devices are readily available which make both overt and covert recording possible.
- 2.2 This policy complements ODST's General Data Protection Regulation (GDPR) Policy. GDPR principles will apply if recordings are likely to result in "personal data" being retained.

3. KEY PRINCIPLES

- 3.1 In normal circumstances, meetings will not be recorded. It should not be regarded that meetings will automatically be recorded. Formal meetings, hearings and appeals are minuted. Full written responses are provided to users, staff queries and complaints. Opportunities are always available for these written records to be discussed and challenged by the people who were in attendance, accordingly recordings will not normally be necessary.
- 3.2 The chair of the given meeting will ultimately decide, if a request is deemed appropriate, that the meeting will be recorded and, prior to the meeting starting, make clear to attendees that secret recordings are not acceptable. If such recording is discovered during the meeting, it is at the chair's discretion whether to continue with or terminate the meeting at that time. As far as possible, the recording should be immediately deleted. If this is not possible, a clear statement about data protection needs to be made to the person found recording the meeting.
- 3.3 The right of an individual to refuse to be recorded will always be respected. No user or member of staff will have his or her voice or image recorded against his or her will. The decision not to record a meeting rests with the chair of that meeting.

3.4 If a request to record is approved, the content of the recording can only be used by the person who requested it for the purpose agreed and on the basis that the processing will comply with the seven key principles of GDPR – Article 5(1) (see below.) It must not be distributed, uploaded to the internet or social media or quoted selectively.

Article 5 (1) of GDPR sets out the seven key principles as:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

3.5 In the case of recording being approved, the recording itself will be made by ODST/school staff and this will be the responsibility of the meeting’s organizer. The original recording will be retained by ODST/school staff. Files of recordings will be stored securely on servers with access limited only to those who have a need to access the recordings. A copy will be supplied to whoever has requested that the recording is made.

3.6 All recordings will be securely disposed of at the end of the retention period.

4. APPLICATION OF THE POLICY

4.1 While ODST does not ordinarily allow recordings of meetings, the following factors must be taken into account when considering a request:

- an individual’s right to privacy (ie to not be recorded if they refuse);
- which lawful grounds under GDPR Article 6 would apply to the processing;
- the needs of the people attending the meeting (ie consideration of reasonable adjustments in relation to disability);
- what other means of recording the meeting are available (ie minute taking);
- the subject matter of the meeting.

5. EQUALITY IMPACT

5.1 An Equality Impact Assessment should be undertaken to identify any differential impacts that this policy may have on diverse groups. Potentially differential impacts were identified in relation to disability and race. Disability-related issues are dealt with below. Language was identified as a race-related issue and would be addressed through provision of interpreters, referred to in Section 5.5 below.

5.2 The Equality Act 2010 aims to protect disabled people and prevent disability discrimination. It provides legal rights for disabled persons in the areas of:

- employment;
- education;
- access to goods, services and facilities;
- buying and renting land or property.

5.3 Employers or service providers must make “reasonable adjustments” to allow a disabled person to use their services – this includes removing barriers to participation and supporting the person requesting the adjustment.

5.4 ODST will fully support making reasonable adjustments where disability is a factor in a meeting participant wanting to record a meeting. These will take account of an individual's needs and circumstances but typical examples of disabilities where some form of recording may be considered include:

- blindness or serious visual impairment;
- deafness or serious hearing impairment;
- learning disabilities, including literacy-related difficulties;
- conditions that adversely affect the ability to concentrate or retain information;
- cognitive impairment, such as autism.

5.5 Examples of types of adjustments that will be considered include:

- the meeting is in an accessible location that has appropriate acoustics, lighting and technology;
- ensuring the time and length of the meeting takes account of individual needs and providing breaks and refreshments as necessary;
- providing meeting materials in the most appropriate format;
- providing personal support to attendees, such as a reader or an interpreter;
- providing note-taking;
- supporting the right of someone to be formally represented or accompanied by a friend in line with the policy under which the meeting is called;
- recording the meeting in accordance with the principles in Section 3.

5.6 This list is not exhaustive, and all reasonable options will be considered to ensure people can participate fully in the meetings that they attend. Further information about reasonable adjustments can be found on the Equality and Human Rights Commission¹ and Citizen's Advice Bureau² websites.

6. REVIEWING THE POLICY

6.1 An initial review will be undertaken one year after the policy becomes effective and then on a three-yearly basis.

¹ <https://www.equalityhumanrights.com/en>

² <https://www.citizensadvice.org.uk/>