



LIONHEART
EDUCATIONAL
TRUST

RECORDING POLICY

**This policy applies to all schools in
The Lionheart Educational Trust**

Approved by Trust Board:

September 2026 – September 2028



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1.0 Purpose

- 1.1 Recordings of voice, video and still images that depict living persons are classed as personal data and are covered under the Data Protection Act 2018 (DPA).
- 1.2 The Lionheart Educational Trust (Trust) has established the following Recording Policy to clearly set out expected behaviours from all persons attending meetings concerning the business of any school within the Lionheart Educational Trust 'the Trust'.
- 1.3 Any persons wishing to use a recording device must read and understand the Acceptable Use Policy, the Mobile Phone Policy and the Data Protection Policy in conjunction with this policy.
- 1.4 For the avoidance of doubt and as most devices are multi-purpose 'Recording' and 'Recording Device' means any electronic device that is capable of playing or recording audio files, video files or taking photographs.

2.0 Policy

- 2.1 This Recording Policy applies to all Trust Staff and any person including parents, carers and authorised adults engaged in any Trust activity.
- 2.2 For the purposes of this policy, the term "Staff" means all members of Trust staff including permanent, fixed term, and temporary staff, governors, trustees, secondees, any third-party representatives, agency workers, volunteers, interns, agents and sponsors engaged with the Trust in the UK or overseas. This policy also applies to all members of staff employed by any of the Trust's subsidiary companies.
- 2.3 This policy has been produced to provide clarity to staff and other stakeholders, including parents, carers and governors, regarding the use of recording devices and the expected standards of conduct during meetings and hearings.
- 2.4 This policy is intended to support compliance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Human Rights Act 1998 and other relevant legislation.

3.0 Purpose of recording meetings

- 3.1 Recording may be of use for lengthy meetings and hearings where maintaining accurate minutes or notes may become difficult over an extended period. It may also be useful for evidential purposes during official Trust hearings.
- 3.2 Such recordings do not replace the formal record of any meeting but may assist with its preparation or accuracy, including through the use of Trust-approved automated transcription. Any automated transcript must be reviewed for accuracy and treated as a supporting working record only. Recording and transcription technology must not replace a minute or note-taker, as technical failures and transcription errors cannot be ruled out.
- 3.3 The Trust will remain mindful of legislation surrounding this topic including the Data Protection Act 2018 and the Equality Act 2010. If a member of staff wishes to record a meeting whether formal or informal due to health reasons (known as a reasonable adjustment recording), the member of staff should discuss this with relevant parties prior to the commencement of the meeting to seek approval from all parties in attendance.



- 3.4 Where a reasonable adjustment recording has been approved, the Chair or minute-taker of the meeting should make a request to IT Support so that a Trust approved device can be issued to be used for this purpose.
- 3.5 Parents/Carers or members of the community attending Trust meetings may wish to make a recording for their own records or to facilitate the meeting due to health or disability reasons (known as a reasonable adjustment recording). The parent/carer/member of the community should discuss this with the member of staff organising the meeting, prior to the commencement of the meeting, to seek approval from all parties in attendance. Should the recording be approved, they may make a recording on their own device but must agree in advance that the recording is to be used solely for their own purposes and that the recording will not be shared with anyone or posted online via any means.

4.0 Notification of recording

- 4.1 Requests to record meetings should normally be made in advance. Advanced notification will allow all parties to raise objections in a timely manner.
- 4.2 Those attending meetings or hearings must be informed in advance of the intention to record the proceedings. This requirement applies to all stakeholders, including staff, parents, carers, governors and trustees.
- 4.3 Any request on the day or at the time of the meeting to record the event or hearing will only be considered in exceptional circumstances.
- 4.4 Any objections to recording of hearings must be considered by the Chair and the Chair will ultimately decide whether the recording is appropriate in light of any objection. There are a number of reasons why an audio recording of a meeting may not be appropriate, such as:
- Information is presented by someone who is using sign-language.
 - Information is presented by someone who has a speech impediment and cannot clearly be heard on an audio recording
 - Information is presented by a student who cannot be recorded for legal reasons
 - Information is presented that it is not appropriate to record for safeguarding reasons.

The above is not an exhaustive list. In all cases the decision of the Chair is final.

- 4.5 The Chair must notify all attendees that recording will take place, prior to the commencement of the recording. The recording must stop at the formal close of the meeting or hearing. Attendees who were not present at the start of the meeting must also be notified that recording is taking place at the point where they arrive at the meeting.
- 4.6 The Trust prohibits all persons from entering into all forms of covert recording. Covert recording means monitoring carried out in a manner designed to ensure those subject to it are unaware that it is taking place. This means that staff members must not secretly record workplace interactions with or between colleagues, managers, students or parents using a recording device. This includes but is not limited to 1:1s and appraisal meetings, team meetings, consultation meetings, investigation meetings or grievance and disciplinary hearings.
- 4.7 Where such recordings come to light, the Trust will determine on a case-by-case basis whether they may be considered as evidence in any internal process and whether any disciplinary action is appropriate.



5.0 Security of devices

- 5.1 Any Trust owned device used to record a meeting or hearing must comply with the Trust's IT Security Policy.
- 5.2 If a person other than a member of staff wishes to record a meeting for personal use as per 3.5 above then they must ensure that the device used has an appropriate level of security so that the data remains protected in the event that the device is stolen.

6.0 Storage and retention

- 6.1 Files of recordings taken on Trust devices must be stored on secure Trust servers with access limited only to those who have a need to access the recordings. The storage of data must comply with the Trust Data Protection Policy.
- 6.2 Recordings should be retained in accordance with the Trust's Data Retention Schedule. Where no specific retention period exists, recordings should be deleted as soon as they are no longer required for the purpose for which they were made.
- 6.3 Any recording made on behalf of the Trust pursuant to this policy shall remain the property of the Trust and must not be copied, shared, downloaded or transferred except where authorised and required for legitimate Trust business purposes.

7.0 Information requests

- 7.1 Staff must be aware that any recordings of meetings or hearings will be subject to the Freedom of Information Act 2000 and Data Protection Act 2018, where relevant, subject to the standard exemptions from disclosure under those pieces of legislation. Any such requests received should be forwarded to the Data Protection Officer. Where it relates to a dispute, copies of recordings may be shared with relevant parties as part of the normal disclosure process as set out in the Trust's Data Protection Policy.

8.0 Disposal

- 8.1 All recordings must be securely disposed of at the end of the retention period in line with the Trust's data retention policy.

9.0 Review

- 9.1 This policy will be reviewed periodically as it is deemed necessary to ensure that it remains appropriate and up to date. These reviews will be no less frequently than every two years. The policy review will be undertaken by the Head of IT and approved by the Chief Operating Officer.