



ROBERT CLACK SCHOOL

RECORDING MEETINGS POLICY

If printed, copied or otherwise transferred from this website this document must be considered to be an uncontrolled copy.

Policy amendments may occur at any time and you should consult the Policies page on the website for the latest update.

Controlled Document

Title	Recording of Meetings Policy
Author	Data Protection Officer
Owner	Headteacher
Subject	Recording of Meetings
Document Version	Version 3
Created	August 2026
Approved	In accordance with the School's governance arrangements
Review Date	September 2029 or earlier where there is a change in applicable law, statutory guidance or relevant technology

Version Control:

Version	Date	Author	Description of Change
1	17/04/2023	Data Protection Enterprise Ltd www.dpenterprise.co.uk	New Policy
2	August 2023	Data Protection Enterprise Ltd www.dpenterprise.co.uk	Policy Review
3	31/07/2026	Data Protection Enterprise Ltd www.dpenterprise.co.uk	Policy review Added smart glasses and wearable technology, AI transcription and meeting assistants, and online/hybrid meeting requirements. Updated retention, information rights and legislative wording.

Contents:

1. Introduction
2. Purpose of School recording meetings
3. School notification of recording meetings
4. When might parents and/or those with parental responsibility want to record meetings
5. Data Protection legislation
6. Regulation of Investigatory Powers Act (RIPA) 2000
7. Confidentiality and Privacy
8. Human Rights
9. Defamation (Libel or Slander)
10. Harassment
11. School Principles to support Parent and/or those with parental responsibilities recording meetings
12. Parents recording meetings
13. Parents recording meetings using mobile phone features
14. Smart glasses, wearable devices and embedded recording technology
15. AI transcription, meeting assistants and automated summaries
16. Online and hybrid meetings
17. A Parent wants to record meetings

- 18. A parent has been covertly recording meetings
- 19. School storage and retention
- 20. School Disposal
- 21. Information Requests
- 22. Policy Review
- 23. Links with other Policies

1. INTRODUCTION

This Policy provides advice and guidance to staff, governors, parents and those with parental responsibility on recording meetings involving the School. It applies to in-person, telephone and online meetings. In this Policy, 'recording' includes audio or video recording, photography, live transcription, automated note-taking, AI-generated summaries and recordings made through mobile phones, computers, meeting platforms, smart glasses or other wearable devices.

Although the recording of meetings is currently not widespread, when the situation arises the chair of the meeting and other participants need to understand the issues involved and provide a clear and consistent response.

This policy aims to provide clarity around the recording of meetings by both staff and parents and/or those with parental responsibility. It will support existing good practice about how meetings are held, and it should encourage staff to listen to parents about their reasons for wanting to record.

This policy supports the School's safeguarding obligations and aims to maintain trust and mutual respect between all parties. While parents may lawfully record for personal use, the School's approach seeks to balance this right with the privacy and welfare of children, staff, and other attendees.

2. PURPOSE OF SCHOOL RECORDING MEETINGS

Recording may be useful for lengthy meetings and hearings where accurate note-taking is difficult. It may also assist during formal proceedings, such as pupil appeals, complaints, disciplinary or employment hearings. A recording, transcript or AI-generated summary does not replace the approved minutes or other formal record. A person must remain responsible for checking accuracy, correcting errors and approving the final record. A minute or note taker should normally remain in attendance in case of technology failure.

3. SCHOOL NOTIFICATION OF RECORDING MEETINGS

The School must notify those attending meetings or hearings in advance of the intention to record the meeting. This advance notification is helpful in avoiding any issues on the day. Any objections to recording must be considered by the Chair and the Chair will ultimately decide whether the recording is appropriate in light of any objection.

At the meeting, the Chair must also 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. The school cannot covertly record meetings and to do so will be considered a disciplinary offence.

Staff must not covertly record a meeting on behalf of the School. Any exceptional proposal connected with a safeguarding or criminal investigation must not proceed without specific written authorisation from the Headteacher and appropriate legal, safeguarding and data protection advice. Unauthorised covert recording by a member of staff may be treated as a disciplinary matter.

4. WHEN MIGHT PARENTS WANT TO RECORD MEETINGS?

Parents and those with parental responsibility may want to record a multi-agency meeting or a child in need meeting or any other meetings about their child.

They may do this covertly or overtly. Covertly means they do this without asking or making it known to others at the meeting. The recording device may also be hidden. However, the School would request that anyone recording a meeting informs all those present. Overtly means that the person recording the meeting is not hiding the fact that they want to do this. They may ask for permission, or they may just state that they are going to record the meeting.

The person recording might record the whole meeting or conference or just part of it.

The reasons for wanting to record a meeting or conference will be different for each parent or family member and may include that:

- They don't want to forget things that were said and find a recording easier than taking notes.
- They may not want to rely on other people's records of a meeting and want an objective record of their own.
- They may not want to rely on the notes of the meeting and/or they may not want to wait for the notes of the meeting to be sent to them.
- They may have negative feelings about the school and/or other professionals generally.
- They have previously disagreed with the accuracy or completeness of a professional's record and were unable to demonstrate that their version of events;
- They may want to use the recording for other means such as to circulate information as part of a campaign.

Parents and/or those with parental responsibility might:

- Keep the recording for their own records.
- Share the recording with their family and/or friends.
- Ask a Court to consider the recording.
- Publish the recording on social media.

5. DATA PROTECTION LEGISLATION

The UK General Data Protection Regulation (GDPR) and Data Protection Act (DPA) 2018 do not prevent parents recording meetings and conversations because the legislation contains an exemption for:

'personal data that is processed by an individual (natural person) solely for the purposes of their personal, family or household affairs'.

It is also likely that such discussions will include 'special category data' which must be treated with greater care because information about these matters could be used in a discriminatory way and is likely to be of a very private nature. The following categories are defined as special category data:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health
- Sex life or sexual orientation

Anyone posting recordings of a meeting on an online forum or on a social networking site will need to check if the GDPR and DPA 2018 applies. The Information Commissioner may investigate if it is believed that someone has gone beyond the scope of the exemption and the Information Commissioner may take enforcement action against them.

While a parent recording solely for personal, family or household purposes may fall within the domestic purposes exemption, the School must handle any recording, transcript or AI-generated note it makes, receives or retains in accordance with the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. Once received and retained by the School, the material may become part of the School's records and be subject to information rights, disclosure duties and the School's retention schedule.

6. REGULATION OF INVESTIGATORY POWERS ACT (RIPA) 2000

The Act does not prevent parents recording meetings and conferences. RIPA only applies to the actions of the school, for example, it gives some protection to parents in relation to surveillance type activity. However, the School may request anyone recording a meeting to inform the Chair before the meeting commences.

The School will not rely on RIPA as a general authority to record meetings or carry out covert surveillance. Where a public authority or law-enforcement body requests or undertakes covert activity, the School will obtain appropriate advice and follow the applicable legal and safeguarding process.

7. CONFIDENTIALITY AND PRIVACY

Whilst everyone has a right to privacy in respect of their personal and private affairs, it is only the families who private information is likely to be discussed in a meeting around a child. Professionals clearly have a duty of confidentiality in respect of the private information about children, young people, and their families that they are aware of, but there are many rules and regulations which permit or require professionals to share or disclose private information about families to protect children or to prevent the commission of crime.

If a recording is simply made for personal use or for use as evidence in private court proceedings it is unlikely to amount to a breach of privacy.

Parents should be reminded that if a recording includes personal data about other individuals (e.g. staff or other parents), using or sharing it beyond personal use may breach their privacy rights and could be subject to legal action.

8. HUMAN RIGHTS

School staff owe a duty to parents and/or those with parental responsibility in relation to their privacy, however, a recording of a meeting attended by school staff is unlikely to contain information about the school staff's private life and would therefore not be in breach of the Human Rights Act 1998.

9. DEFAMATION (LIBEL OR SLANDER)

Distribution of a recording of something that a person has said is unlikely to be capable of being defamatory of the person speaking, although distribution of a recording of somebody saying something about somebody else could be (if it contained an untruth which was likely to seriously damage the reputation of that person). What is said in a meeting around a child is likely to amount to 'honest opinion' which is a defence to a libel claim.

The reliance upon or playing of a recording in private court proceedings (if permitted) is unlikely to be defamatory, and if its contents are reported in a judgment, it is not defamatory to quote that judgment, although judgments of the Family Court cannot be published without permission of the judge.

10. HARASSMENT

If somebody was to use a recording of a meeting or a part of a meeting to harass somebody at the meeting, for example if it was done very aggressively by thrusting a recording device in the face of a participant, or with explicit or implied threats of going public/putting on the internet or by circulating the material in a way designed to cause distress or fear – a court could potentially be asked to make an order stopping that (an injunction).

If a recording were used to harass a professional, it is possible a court could be asked to make an injunction.

11. SCHOOL PRINCIPLES TO SUPPORT PARENT AND/OR THOSE WITH PARENTAL RESPONSIBILITIES RECORDING MEETINGS

The school have identified a set of principles to support recording meetings and conferences:

- Staff will behave professionally in meetings and provide factual, clear, evidence-based information to support discussions and decision making;
- The School will work within the law and statutory guidance around the recording meetings;
- The School will not agree to meetings being recorded if they believe this would cause distress to a child or breach another person's privacy rights unless it is demonstrably necessary and proportionate.
- The School will remind attendees that information discussed at meetings is confidential and that they become responsible for any information that they may take out of the meeting;

- The School will be positive and proactive where the situation arises that someone asks to record a meeting or conference and provide a consistent and clear response;
- The School will work with parents and/or those with parental responsibility when the situation arises to explore with them why they might want to record a meeting;
- If a parent and/or a person with parental responsibility states that they intend to record a meeting the school will inform them of the issues of recording a meeting regarding privacy and the use of private information.
- Where the reason for wanting to record a meeting is to do with any requirements the person has with a learning difficulty, learning disability, sensory or physical impairment, or where English is not their first language, the school will provide additional support to enable the person to understand what is being said and for a record to be made which they can understand;
- The School will ensure that the interests of the child or young person are central to any discussion about recording meetings to ensure that any action taken is not likely to cause the child to suffer significant harm;
- Where the local authority has parental responsibility (when the child is subject to an interim or full care order or a placement order,) the Social Worker will decide what is in the best interests of the child;
- Where the child or young person has the age and understanding to participate in a discussion about whether someone should record a meeting, they will be included in the discussion and their views taken into account;
- Where there is difference in opinion between parents, the chair of the meeting will temporarily stop the meeting to explore the situation with each parent or family member;
- The school will record in the written minutes that the meeting was recorded and by whom;

12. PARENTS RECORDING MEETINGS

The School will ask at in advance of the meeting itself if anyone is recording the meeting to allow time for the other people involved to consider your request and respond.

It might be helpful if you explain why you would like to record the meeting. For example :

- I don't remember things very well and I'm not very good at taking notes.
- The minutes of meetings always come too late.
- I feel worried that things I have said, or others have said might not be accurately recorded.
- I remember and understand better if I can hear things rather than reading them.
- I have a disability which makes it difficult to take notes or affects my memory or concentration.

It might be helpful if you agree to record the whole meeting and to send a copy of the entire unedited recording to the other people at the meeting if they would like it.

It might be helpful if you reassure the people at the meeting that you will only use the recording for your own use, or for court proceedings relating to the children, or in the taking of legal advice, and that you will not publish or distribute the recordings on the internet or otherwise.

The recording you make might contain other people's private information (including your children's') and it is a good idea to make sure that everyone understands that you appreciate their privacy is important.

If you are told you cannot record, you could ask for an explanation to be given so you can see if the reason given is a good one or if there were any practical solution that would resolve the problem. If they give a reason that you think is not a very good one you ask them to reconsider.

13. PARENTS RECORDING PHONE CALLS USING MOBILE PHONE FEATURES

Parents and/or those with parental responsibility may choose to record phone calls with school staff using mobile phone features or third-party applications. While UK law does not prohibit individuals from recording calls they are part of, the School sets out the following guidance and expectations in the interests of transparency, trust, and safeguarding.

School Position on Parents Recording Calls

- Parents are permitted by law to record phone calls they are a party to, for their own personal use, under the domestic purposes exemption in the UK GDPR and Data Protection Act 2018.
- However, the School requests that parents inform staff at the beginning of a call if they intend to record the conversation, in line with the School's values of openness and mutual respect.
- If a parent begins recording without informing staff, this is considered covert recording, and while not unlawful, it may impact trust and future communication arrangements.

Why Parents Might Record Calls

Parents may wish to record calls to:

- Assist with memory or note-taking for complex discussions.
- Ensure accuracy when relaying information to family members.
- Keep a record of agreements or advice given.
- Support legal or advocacy processes related to their child.

Safeguarding, Privacy, and Data Protection

- Phone calls between parents and the School may contain personal data or special category data, such as information about a child's health, behaviour, or educational needs.
- Parents are reminded that while recording for personal use is allowed, sharing, publishing, or distributing such recordings (e.g., on social media or in campaigns) may breach:
 - The privacy rights of staff or third parties,
 - The UK General Data Protection Regulation (UK GDPR),
 - The Data Protection Act 2018,
 - And potentially result in legal consequences or action by the Information Commissioner's Office (ICO).
- If a parent shares a recorded phone call with the School, it may become School-held data and be subject to access requests, retention schedules, and legal disclosure.

School Response to Recorded Calls

- The School will continue to behave professionally and respectfully during all phone conversations, regardless of whether a call is being recorded.
- Where the School becomes aware that a parent is recording calls covertly and there is concern about misuse, harassment, or privacy breaches, the School may:
 - Request future conversations be made in writing or through pre-arranged meetings.
 - Involve the Local Authority or seek legal advice.
 - Limit further direct telephone contact, if necessary to protect staff wellbeing or safeguarding obligations.

Support for Parents with Additional Needs

If a parent has a disability, neurodiversity, language barrier, or other need that makes recording calls helpful for their understanding or communication, the School will take a supportive and inclusive approach. Reasonable adjustments (e.g., follow-up written summaries) may also be offered as an alternative to recording.

14. SMART GLASSES, WEARABLE DEVICES AND EMBEDDED RECORDING TECHNOLOGY

Smart glasses and other wearable or AI-enabled devices, including Meta or Ray-Ban Meta glasses, can capture audio, images or video discreetly and may also provide live-streaming, voice-assistant, transcription or AI functions. Their use creates particular privacy and safeguarding risks because children, staff and visitors may not realise that recording is taking place.

Smart glasses or other wearable recording devices must not be used to record, photograph, stream or transcribe a School meeting. They must be removed or switched off and put away before the meeting begins. A status light, verbal command or device setting is not a substitute for openly notifying everyone present and obtaining the School's agreement.

Where a person needs wearable technology because of a disability or accessibility requirement, the School will discuss a reasonable adjustment in advance. Any agreed use must be limited to the necessary function, must not capture people or information beyond what is required, and must be documented by the Chair.

The restriction also applies in other areas of the School where meetings take place and where pupils, safeguarding information or confidential material may be present. Any suspected unauthorised recording must be reported promptly to the Headteacher and the Data Protection Officer and managed under the School's safeguarding, behaviour, staff conduct and data breach procedures as appropriate.

15. AI TRANSCRIPTION, MEETING ASSISTANTS AND AUTOMATED SUMMARIES

The School may use live transcription, automated note-taking or an AI meeting assistant only where the tool and the specific use have been approved in advance. Approval must include appropriate information-security and data-protection checks, contractual safeguards, and a Data Protection Impact Assessment where the proposed processing is likely to result in a high risk to individuals.

The Chair must tell attendees in advance, and again at the start of the meeting, what tool will be used, what it will capture, why it is needed, who will receive the output and how long the recording,

transcript and summary will be retained. A visible meeting-platform notification alone should not be relied upon as the only notice.

Staff and external attendees must not introduce an AI bot, transcription service, personal digital assistant or similar tool into a meeting without the School's prior approval. Free consumer AI services, personal accounts and unapproved applications must not be used to process meeting content or School personal data.

Before an approved AI tool is used, the School must be satisfied that only necessary information will be processed; access is appropriately restricted; data is securely stored; retention, deletion, data location and sub-processor arrangements are understood; and meeting data will not be used by the provider to train or improve a general AI model unless the School has expressly approved a lawful and transparent arrangement.

Particular care must be taken with safeguarding, SEND, health, equality, employment, disciplinary and other special category or highly confidential information. If an approved tool is not suitable for that information, it must not be used, and manual notetaking should be adopted instead.

AI output may be inaccurate, incomplete or misleading. A suitably informed member of staff must check the transcript or summary against the meeting, correct errors and approve the final record. AI output must not be treated as fact merely because it appears authoritative and must not be used as the sole basis for a decision about a pupil, parent, member of staff or other individual.

Recordings, transcripts, prompts, summaries, action lists and chat logs created or retained by the School are School records. They must be stored only in approved systems, may be subject to subject access or Freedom of Information requests, and must be retained and deleted in accordance with this Policy and the School's retention schedule.

16. ONLINE AND HYBRID MEETINGS

For meetings held through Teams, Zoom or another approved platform, recording, transcription, captions and AI features must be off by default unless their use has been authorised for that meeting. The Chair must check the participant list, explain any enabled function and ensure that late joiners are notified. Participants must not make separate recordings or invite external recording bots without prior agreement.

Live captions used solely as a temporary accessibility aid should not be saved unless there is a clear need and an approved retention period. Where a transcript or summary is saved, it must be treated as a School record.

17. A PARENT WANTS TO RECORD MEETINGS

There may be good reasons for a parent wanting to record a meeting. In some cases, permitting a parent to record interactions with professionals may reassure them and enable them to engage more effectively with you and others.

As a professional you cannot rely upon the Data Protection Act or RIPA as a reason to refuse permission to a parent to record meetings.

There is no law that says the consent is required before a parent can record meetings, they are participating in.

If you are anxious about what a parent might do with a recording, it might be helpful to have a discussion with them about why they want to record and what they will do with the recording.

18. A PARENT HAS BEEN COVERTLY RECORDING MEETINGS.

You might want to initiate a non-confrontational conversation with the parent about why they feel they needed to record covertly (reasons might range from them being worried they would not be allowed if they asked to wanting to catch you out). You might be able to agree to an open recording of future meetings.

Where covert recording has taken place and the School believes this may breach trust, privacy, or safeguarding expectations, the School may consider limiting future meeting formats, involving the Local Authority, or taking legal advice on the appropriate response. The School may also restrict future attendance to written correspondence if risk is deemed significant.

19. SCHOOL STORAGE AND RETENTION

Any recording, transcript or AI-generated note made or retained by the School must be stored in an approved School system with access limited to those who need it. It must not be stored in a personal account, on a personal device or in an unapproved AI service. For routine meetings, the raw recording, transcript and draft AI output should be deleted once the minutes or formal note have been checked and agreed, unless there is a documented reason to retain them for longer.

For a formal hearing, complaint, safeguarding matter, employment process or legal dispute, retention must follow the relevant record category in the School's retention schedule. A legal hold, ongoing claim or safeguarding need may require longer retention. The reason and review date must be recorded.

20. SCHOOL DISPOSAL

All recordings, transcripts, AI outputs and working copies must be securely deleted from the approved system, recycle bin and any authorised temporary location at the end of the applicable retention period. Where material forms part of a formal decision or outcome, it must be retained under the relevant entry in the School's Record Retention and Deletion Policy rather than under a blanket period.

21. INFORMATION REQUESTS

Staff must be aware that School-held recordings, transcripts, AI prompts, summaries and other meeting records may fall within a subject access request or a request under the Freedom of Information Act 2000, subject to the applicable exemptions and restrictions, including safeguarding, third-party personal data and legal professional privilege. Requests must be forwarded promptly to the Data Protection Officer. Material may also need to be disclosed to relevant parties in a complaint, hearing, investigation or legal process.

Before disclosure, the School will consider the rights of other individuals and may redact, withhold or provide an alternative form of the information where permitted by law.

22. POLICY REVIEW

The DPO is responsible for monitoring and reviewing this policy. Although this policy is reviewed every three years, changes to legislation, national guidance, codes of practice or advice from the Information Commissioner advice may trigger interim reviews. The DPO will highlight any significant legislative developments that may require earlier action or updates to this Policy.

The School will review this Policy where changes to data protection law, AI guidance, recording technology or safeguarding expectations affect its operation.

23. LINKS WITH OTHER POLICIES

This Recording of Meetings Policy is linked to the School:

- Data Protection Policy
- Freedom of Information Policy
- Subject Access Request Policy
- Information Security Policy
- Information Sharing Policy
- Safeguarding and Child Protection Policy
- Complaints Policy
- Behaviour and Anti-Bullying Policy
- Acceptable Use of IT Policy
- Artificial Intelligence (AI) Policy
- Staff Code of Conduct
- Record Retention and Deletion Policy

The Information Commissioner's Office provides a free helpline and a wide range of guidance and resources relating to information rights and data protection. Further information is available from: [Information Commissioner Office \(ICO\)](#)