Policy for

Audio Recording of Governance Meetings

Prepared by:	Adopted by Board of Trustees	Signed	Review Date
GSO September 2018	13th December 2018	**S Bowen** --------------------------------- Chair of Board of Trustees	06/09/2020

1. Introduction

Audio recording of meetings is as a form of data processing, as recorded conversations have the potential to capture personal information, including names, addresses, financial details, religious beliefs, and medical records. Under the DPA, individuals must be informed about the purpose of the recording. When it comes to consent, however, tacit consent is assumed under the DPA as long as individuals are informed about the recording and given the option to opt out.

This policy sets out the circumstances where the clerk to The Aspire Educational Trust can record meetings and the steps that are required to ensure that any recording conforms to information legislation. The Board also needs to consider how recording conversations may impact on The Trust's governance. It must not impact on the free and frank exchange of views and ideas.

2. Policy Statement

The term "recording" covers the audio records take on the audio device provided by The Aspire Trust to the clerk to The Trust. The device remains the property of The Trust.
Recording is permitted in governance meetings for which formal minutes are required.

3. Compliance

The Aspire Educational Trust complies with the Data Protection Act, the Freedom of Information Act and associated legislation. The Trust is the data controller and is responsible for any breaches.

Recording of governance meetings is in the public interest as the minutes form a public record of the governance of The Aspire Educational Trust which is required by The Financial Handbook for the accountability of The Trust. Making temporary audio recordings is therefore deemed necessary for fulfilling the legal obligation to which The Trust is subject.

The Chair of a meeting may request that the recording device is switched off at any time. E.g. for any Part 2 items that identify individuals who could request the recording via a SARs request. Recoding this information could lead to the collection of information that the Trust would no longer control.

4. Rationale

Recordings of voices are classed as personal data and subject to the provisions of the Data Protection Act. The Act requires that all data is processed in line with Data Protection Principles. The first principle requires that certain conditions are satisfied in order for personal data to be collected. These conditions are based on the premise that the data use, which in this case is the recording, is necessary for the required purpose and in this case for achieving a legitimate interest. The clerk to the Aspire Trust needs to take an audio record of governance meetings to ensure the accuracy of the minutes of long and detailed meetings. The clerk can attend many meeting in a week and needs the recordings to ensure that in the time needed to write up the minutes of each meetings, no information is lost.
Recordings of meetings are subject to the access provisions of the Data Protection Act, the Freedom of Information Act and associated legislation. They would have to be reviewed in the event of any such requests and may have to be supplied in whole, or in part as a recording or as a transcribed version.

5. Security and Retention

Audio recordings are taken on a mobile device which must be kept secure by the clerk until the recording is destroyed. Recording will remain on the mobile device and not be transferred to any other device by the clerk or anyone else. Only the clerk will play back the minutes and for the intended purpose.

The retention period for the audio recording of governance meetings is until the chair of the committee has checked the minutes. The audio recording will be deleted by the clerk to the meeting as soon as the committee chair has agreed the minutes of the meeting.

The clerk will report the deletion of all recording to The CEO as part of their performance management.