

Lesson approach	Audio/ Visual	Data Subject	Purpose
Live not recorded	Audio	Teacher	Where lesson content requires pupil participation/ engagement
	Visual	Teacher	
	Audio	Pupil	
	Visual	Pupil	
Pre-recorded	Audio and/ or visual	Teacher	Where lesson content doesn't require pupil participation/ engagement and safeguarding is managed by another means
Live recorded	Audio	Teacher	To fulfil statutory obligations regarding Safeguarding and the provision of high quality education
	Visual	Teacher	
	Audio	Pupil	
	Visual	Pupil	

Lawful basis	Parent/ pupil notified of approach	Covered in Policy
Legal obligation (to meet statutory obligations to provide remote lessons, maintain safeguarding standards and deliver high standards in teaching during UK wide lockdown/ localised lockdowns/ school closures)	Should. Privacy Notice must be shared as a minimum.	States live remote lessons will be provided
		States consent must be sought from the HTB
Consent from teaching staff	Should. Privacy Notice must be shared as a minimum	Yes
Legal Obligation (i.e. statutory obligations for safeguarding and the provision of high quality education)	Must. Privacy Notice must be shared	Yes
		States consent must be sought from the HTB

Retention period	Comments
NA	The subject /discussions must be for the purpose of fulfilling the requirements of the lesson. Under no circumstances should and personal data nor sensitive personal data (eg health) be discussed during live lessons.
	It may be deemed necessary for either safeguarding or for the provision of high standards in teaching that pupil mics and videos are engaged. Take special care when making your decision to do so as there may be additional risks.
3 years	Ensure Policy is adhered to re safe and secure storage and secure disposal/ destruction at the end of the retention period. Lessons to be shared only for pupil learning purposes (i.e. for no other purposes such as performance management of the Teacher).
Up to 1 year	Increased risks can be associated with the recording of live lessons where pupil audio and video are engaged. Before making your decision to record the live lesson you must carefully think through these risks and satisfy yourself that this is the most appropriate action to take. In doing so, you must consider the following: 1. Is there another less intrusive way in which you can fulfill your safeguarding/ provision of high standards of teaching obligations? If so you MUST adopt these other approaches. 2. Clearly determine that the recording is absolutely NECESSARY for safeguarding and/ or the provision of high standards in teaching. 3. You are not recording the lesson for any other purpose. 4. The recording is safely and securely saved to either onedrive or Sharepoint and no unauthorised access is permitted. 5. The recording can only be shared with pupils from the lesson class and no other third party and only where there are no safeguarding concerns and the sharing is to support high standards of teaching. Where there is a safeguarding matter, the recording must only be shared with authorised personnel and for the purpose of addressing the safeguarding matter 6. Recorded lessons can be subject to a Data Subject Access Request, therefore you must be able to protect the rights of all other data subjects (participants) who feature in the recording (i.e. deletion, redaction, blurring etc). 7. Consider whether it is essential that the full lesson is recorded to fulfil your purpose or whether you can in fact record only parts of the lesson or take screen shots etc. 8. Recordings should be kept for no longer than 12 months unless they're subject to an ongoing safeguarding investigation. Consideration should be given to whether in fact you need to retain the lesson for as long as 12 months, if not then securely delete it at the earliest opportunity.