

# Academic Recording Policy

**Document owner:** Digital Delivery

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**Related Policies:**

- [Interim Learning and Teaching Strategy](#)
- [Data Protection Policy](#)
- [Information Security Policy](#)
- [RCA Policy on Ownership, Protection and Exploitation of Intellectual Property Rights](#)

**Approvals route:**

**SMT: ASC** > Internal review & Approval

Purpose of this policy

This policy defines what type of teaching and learning activities may be recorded and specifies the rights and responsibilities of staff and students, where they have recorded content.

This policy applies to all Royal College of Art academic and professional services staff and students.

Informed consent

All recordings captured within the RCA, by any user, are done so with the assumption that all attendees have given fully informed consent for the recording to take place.

Related documents:

[Consent form with term and distribution options](#) (Template form for Schools to duplicate point 3.15)

## **1. What is classed as recorded content?**

- 1.1.** Recorded content is classed as any video or audio captured as part of teaching and learning activities.
- 1.2.** Recorded content can be captured using many devices or applications; this list provides examples, but is not exhaustive:
  - i. Video Conferencing software such as Zoom, GoogleMeet or similar
  - ii. Screencasting software such as Panopto Capture, Camtasia or similar
  - iii. Where explicit consent is given, mobile phone recordings of lectures or tutorials.
  - iv. Note-taking software such as Otter or Glean, which record audio.

## **2. What we record and Informed consent**

- 2.1.** Recordings made as part of an academic programme offering or professional service should identify, and communicated to participants, what will and will not be recorded and how it will be used; shared with a specific programme or department, College-wide or publicly available.
- 2.2.** Events outside of academic programmes should include a recording statement in the description of the event to inform participants of that the event will be recorded and how it will be used.
- 2.3.** At the start of a recorded event, the chair or moderator must verbally reiterate that recording is taking place.
- 2.4.** Any recordings must have informed consent from all parties who appear in a recording. If an event takes place and a participant wishes to remain anonymous there are clear steps to take to do so:
  - i. In lecture theatres or teaching spaces:
    - Sit outside of the field of view of the camera and/or microphones.
    - Questions can be passed to moderators.
  - ii. In Zoom/Video calls:
    - Ensure camera feeds are turned off during the meeting.
    - Use Chat or 'Q&A' features to pose questions.
- 2.5.** Recorded as Standard:
  - i. Presentations. This includes teaching types such as *lectures* and *briefings*. Any discursive element that involves interaction with the audience should not be recorded as standard.
- 2.6.** Where recording of assessment is required by the programme, these recordings will be available to staff and students until the results have been agreed by ABCD and then destroyed.

**2.7. Recorded with informed Consent (not recommended):**

- i. One-to-One Tutorials - this may only be shared between a tutor and a single student.
- ii. Group Tutorials - consent must be agreed by all participants.
- iii. Please see security guidelines to fully understand responsibilities if you choose to record this content (**Point 4.1**)

**2.8. Where recording should **not** occur:**

- i. Sessions with high interactivity, such as seminars or crits.
- ii. Where it has been identified that there may be reasons it should not be recorded, such as sessions where:
  - There are concerns of an ethical nature.
  - There are legal reasons or concerns (UK-GDPR, denial of consent, copyright, see **sections 4 & 5**)

**2.9. Where a student has an inclusion plan / specific needs which require reasonable adjustments, additional recordings may be made solely for this purpose.**

### **3. How recordings can be used**

#### **Student Use**

- 3.1.** Students may use recordings for their own personal learning for the duration of their enrolment at the RCA.
- 3.2.** Students must destroy any copies of programme recordings which are not covered by **point 3.3**, once their enrolment has ended.
- 3.3.** Students may retain copies of personal recordings but use of these outside of the RCA is limited and subject to all stipulations in **section 2**.
- 3.4.** Students should not use recorded content as a substitute for attendance of in-person events, unless exceptionally agreed with the programme team

#### **Staff Use**

- 3.5.** Staff can create and use recordings for their teaching practice and can allow varied levels of access (Small group, Programme, School or College-wide) with appropriate safeguards in place (see **sections 2 & 4**).
- 3.6.** Programme related recordings are stored in Panopto in a folder which is directly linked to a course on the VLE (Moodle). Access to recordings is via the VLE (Moodle).
- 3.7.** Recordings are managed and administered by that programme team alongside annual VLE (Moodle) administration and are subject to retention terms (**points 3.13-15**).

- 3.8. Staff may use their recordings for their own performance review, peer-teaching or for teaching observation practice.
- 3.9. Recordings will not be used as part of staff performance reviews or disciplinary purposes without the consent of the staff member, except in the case of alleged gross misconduct.
- 3.10. Staff can request their recordings to be removed from circulation where a clear justification has been provided and agreed under the [RCA Policy on Ownership, Protection and Exploitation of Intellectual Property Rights](#). This must be communicated to students.
- 3.11. Recordings may not be used to substitute for staff taking part in industrial action without their express consent.
- 3.12. Recordings may not be used in place of, or to cover, staff in a room where the event/session would normally be held unless the recording was made for this purpose or consent is given by the staff member.

### Retention of Recordings

- 3.13. **Recorded as standard:** Recordings made by regular contracted staff are retained in perpetuity and managed and shared under the [RCA Policy on Ownership, Protection and Exploitation of Intellectual Property Rights](#)
- 3.14. **Recorded with informed Consent** (not recommended): These recordings are only retained for the duration of a specific academic intake and administered by that programme team alongside annual VLE (Moodle) administration.
- 3.15. **Guest Speakers:** Recordings made as part of a programme by a Guest Speaker should be negotiated at point of engagement. Guest speakers should complete a consent form to outline their consent for level of access and retention requirements. The School will be responsible for managing this process.
- 3.16. **Students:** Retain access to their personal recordings for the duration of their enrolment. Upon convocation access to recording storage is removed.

### Use by the RCA

- 3.17. Learning analytics and data collected from recordings may be used to better understand, review and improve the student experience and services offered by the RCA.
- 3.18. Recordings may be requested for alternate use, such as by another programme, with the consent of the recording author. Any recording under consideration must be reviewed for security and privacy purposes, and edited where required, before being used; such as removing Q&A at the end of a talk.
- 3.19. Recordings may be reviewed under Student Code of Conduct policy if an allegation of gross misconduct has been made.
- 3.20. Recordings may be used by academic programmes or services for business continuity in exceptional cases, such as but not limited to, the loss of estate, natural disaster or pandemic or similar event. Where this may apply, consent of

the recording author where it is reasonably possible to do so should be sought. The author retains the right to refuse use of their recording provided a legitimate reason is submitted and as such the RCA will comply with this request.

#### **4. Security and Privacy**

- 4.1. Recordings are processed in accordance with the [Data Protection Policy](#) and [Privacy Notices](#). All users have responsibilities to adhere to the Data Protection Regulations 2018 and maintain confidentiality and integrity of information. Staff must complete the Mandatory Data Protection and Information Security training as part of their contract of employment.
- 4.2. If there are concerns about a recording they can be reported in one of the following ways:
  - i. A breach of the Data Protection and privacy: [DPO@rca.ac.uk](mailto:DPO@rca.ac.uk)
  - ii. Copyright law and IP policy (See section 5): [copyright@rca.ac.uk](mailto:copyright@rca.ac.uk)

#### **5. Third Party Copyright and access**

- 5.1. Third party content may fall into 'Fair Dealing' or exception if used for illustration or instruction.
- 5.2. All third party content must be accompanied by a visible citation and/or clear attribution on screen when used.
- 5.3. Staff and students must liaise with Library and/or Special Collections where it unclear if third party content can be captured as part of a recording, this is not limited to:
  - i. Copyright Licenced audio or video content
  - ii. Commercial content
- 5.4. Recordings which are potentially identified of breaching this policy can be reported as of section **point 4.2**.

#### **6. Accessibility and Student Experience**

- 6.1. The Equality Act 2010 and Web Content Accessibility Guidelines (WCAG) outline the RCAs responsibilities in regard to making reasonable adjustments to learning content so that it is accessible for all audiences. To ensure both are met, recordings and/or live events should be accompanied by:
  - i. Subtitles should be enabled during all live events.
  - ii. Closed captions are available for all recorded content.
  - iii. Sign Language Interpreters can be used where there is an identified need during live events.
  - iv. Where possible, text versions of audio or video recordings should be made available on the VLE (Moodle).