

Privacy Notice – Video Lesson Capture

Introduction

This privacy notice is intended to be read by students as well as anyone who has been listed as a permitted contact by a student inclusive of parents, guardians and carers. The term 'student' is inclusive of all provisions including further education, higher education, part and full-time courses and apprenticeships.

This privacy notice describes how we; University Centre Somerset College Group (UCS College Group) collect, use and protect your information. In this context, we are called the data controller.

About the Group

UCS College Group is a group consisting of Bridgwater College, Taunton College, Cannington College and Strobe College as well as University Centre Somerset.

Name: UCS College Group

Email address: dpo@ucscollegegroup.ac.uk

Data Protection Officer: Emma Kilner

UCS College Group are the data controller for the purposes of data protection law, and we are registered with the Information Commissions Office (ICO) Registration Number **Z4677243**.

What video lesson capture means

Video lesson capture is the audio or video recording of a taught session, demonstration, presentation, discussion, assessment or event so that the recording can be used for an identified educational purpose. Recording may take place in the classroom or through an online learning platform.,

The tutor or event organiser will inform the attendees when recording is planned. Where technology permits, an on-screen indicator will show that recording is in progress.

Why we use recordings

- To deliver teaching and learning and provide students with access to taught materials;
- To support revision, recap and independent study;
- To improve accessibility and make reasonable adjustments;
- To record practical demonstrations, presentations or approved events;
- To conduct an assessment and to provide evidence
- To maintain academic standards, quality assurance and respond to an academic query

Personal data we may collect about you

- your image, voice and likeness;
- your name, display name, username or student identifier;
- your questions, comments, opinions, actions and contributions;
- chat messages, reactions and participation information;
- material you present or share, including slides, documents or screen content;
- information about attendance or engagement that can be inferred from the recording;
- assessment evidence, marks or feedback where the recording is part of an assessment.

Special category data

Lesson capture is not intended to collect special category information, such as information about health, disability, ethnicity, religion, political opinions, trade union membership, genetics, biometrics or sexual orientation, or information about criminal allegations or convictions. Please avoid disclosing this information during a recorded session unless it is necessary and you have been asked to do so.

If sensitive information is captured unexpectedly, we will minimise its use and may pause, edit, restrict or delete the relevant part of the recording. If the Group needs to record this information for a planned purpose, it will identify an appropriate additional legal condition under Article 9 UK GDPR or the Data Protection Act 2018 and provide any further information required before recording.

Our lawful bases

The lawful basis depends on why the recording is made:

Purpose	Lawful basis
Teaching, learning, accessibility and educational administration	Public task: Article 6(1)(e) UK GDPR. The processing is necessary for the Group to deliver education and exercise its official functions.
Recording required as part of an agreed assessment or course arrangement	Public task under Article 6(1)(e), or contract under Article 6(1)(b) where the processing is necessary to deliver the relevant contractual education or training service.
Optional events or uses that are not part of the Group's public functions	Legitimate interests: Article 6(1)(f), where applicable. Our interests are to provide useful educational events and resources. We assess necessity, reasonable expectations and privacy impact before relying on this basis.
Compliance with a specific legal requirement	Legal obligation: Article 6(1)(c), where recording or disclosure is required by law.

We do not rely on consent for routine lesson capture. Asking not to appear in a recording is therefore not the same as withdrawing consent. However, we will consider reasonable alternatives and objections in line with section 10 below.

Who can access recordings

- students registered on the relevant course, module, class or event;
- the tutor, assessors and other staff who need access for teaching, support, quality assurance or administration;

- authorised IT and system administration staff where access is necessary to support or secure the service;
- technology suppliers acting on our instructions as data processors;
- professional advisers, regulators, law enforcement bodies or other organisations where disclosure is required or permitted by law.

Assessment recordings will normally be restricted to the student, relevant assessors, moderators and authorised staff. We will not make lesson recordings publicly available or share them for commercial purposes unless participants have been given separate information and an appropriate lawful basis has been identified.

Systems, security and international transfers

Recordings are stored within the College Group's learning and video platforms. Access is controlled through College accounts, role based permissions and other proportionate security measures. Users must not download, copy, edit, publish, or share a recording unless the Group has expressly authorised this.

Some approved suppliers may process information outside the UK. Where this occurs, the Group will ensure that a lawful transfer mechanism and appropriate safeguards are in place, such as UK adequacy regulations or the UK International Data Transfer Agreement or UK Addendum, together with any required risk assessment.

How long we keep recordings

Routine lesson recordings will normally be available only for the period in which they are needed for the relevant course or module and will be deleted no later than the following the end of that academic year or course, unless a shorter period is set by the tutor.

Recordings forming part of assessed work, an academic appeal, a complaint, safeguarding matter or legal claim may be retained for the period set out in the Group's retention schedule or for as long as the matter remains active. At the end of the relevant period, recordings will be securely deleted or anonymised. Copies must not be retained merely because they may be useful in future.

Your choices and right to object

Where practical, you can reduce the amount of your information captured by keeping your camera off, using an appropriate seating area, asking questions outside the recorded portion, or using another participation method agreed with the tutor. Tell the tutor or event organiser before the session if you have a concern, particularly where recording may affect your safety, privacy, disability support or reasonable adjustments.

Where processing is based on public task or legitimate interests, you have the right to object because of your particular situation. We will consider your objection and whether the recording is necessary. We may continue only where the law permits, for example where we can demonstrate compelling legitimate grounds or the information is needed for legal claims. If recording is necessary for an assessment, we will consider whether a reasonable alternative is available, but an objection may not automatically mean that the assessment requirement can be removed.

Your data protection rights

- ask us to correct inaccurate or incomplete information;
- ask us to delete information in certain circumstances;
- ask us to restrict how we use information in certain circumstances;
- object to processing based on public task or legitimate interests;
- receive information you provided in a portable format where the right to data portability applies;
- complain to the Data Protection Officer

These rights are not absolute and exemptions may apply. We will explain our decision if we cannot fully comply with a request. Lesson capture is not used to make decisions about you solely by automated means that have legal or similarly significant effects.

Contact us or make a complaint

If you have a concern about how we have handled personal information, please contact the Data Protection Officer at dpo@ucscollegegroup.ac.uk so that we can investigate and respond.

You also have the right to complain to the Information Commissioner's Office. Information about making a complaint is available at <https://ico.org.uk/make-a-complaint/> and the ICO helpline is 0303 123 1113.