



Heddlu Police

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Procedure Document			
Procedure:	Recording of meetings – Office 0365		
Sign off:	Information Management Sub-Group 08.04.21		
Procedure Owner:	Head of ICT		
Author:	[REDACTED] - Information Manager/Data Protection Officer		
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PROCEDURE Document

Recording of meetings via Office 0365

1.0 Introduction

This procedure document has been produced to provide advice to staff on the required processes connected with the recording of meetings via Microsoft Office 0365. They are set in place to ensure the Force's obligations under Data Protection legislation, the Human Rights Act and any other applicable legislation.

2.0 Purpose of recording meetings

Recording of meetings may be made where the accuracy of minute or note taking can be difficult due to the nature, subject matter, complexity or length of the meeting. It may also be used for evidential purposes as required eg hearings organised by the Professional Standards Department (PSD).

Such recordings do not replace the formal record of any meeting, eg minutes and actions. The recording of the meeting may however assist in ensuring the accuracy of the formal record in the event of any dispute. The recording however should not be considered as a replacement to a minute or note taker.

3.0 Detail of the procedure

3.1 When a meeting is held and a decision is made to record the meeting it will be recorded using Office 0365 Teams. There may be occasions where it is necessary to use alternative means of recording eg a dictaphone etc this procedure will also apply in those cases.

3.2 The recording will capture all audio content from the meeting. It will also capture all visual content from the meeting, which will include images of participants when their cameras are switched on (their avatars when not), and any sharing of screens that occurs during the meeting. The meeting chat log is not captured along with the video and audio content package, but is retained as long as the meeting is retained.

There are a number of business benefits in recording such meetings including:

- Assisting in the creation of written records of meetings.
- Enabling invitees and others not attending meetings to retrospectively view the meeting in lieu of their attendance.
- Enabling participants to retrospectively view the meeting to clarify outcomes of particular conversations.



- The recording of such meetings using any technology engages Data Protection legislation as it results in the processing of personal data relating to data subjects (identifiable living individuals).
- This procedure is intended to ensure that such recordings are managed in compliance with Data Protection legislation.

3.3 Meetings invitations will include the following statement:

The Meeting will be recorded using Office 365 Teams. Invitees may wish to view the '*Recording of Meetings Procedure*' document available on the Intranet and Internet, and the Dyfed Powys Police Privacy Notice available on the Force website. (www.dyfed-powys.police.uk/hyg/fpndyfed-powys/privacy-notice/)

3.4 Meeting Management

At the outset of the meeting participants will be advised by the Chair that the meeting is being recorded using 0365 Teams. At the Chair's discretion participants may be reminded of the existence of this procedure and the Force Privacy Notice. 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 objections.

0365 Teams will display the fact that the meeting is being recorded and this will allow any participants joining the meeting after it has commenced to be aware of the recording. The recording will stop at the formal close of the meeting.

There is no restriction arising from Data Protection legislation that requires participants to refrain from mentioning or discussing any individual not invited or participating in the meeting.

The Chair has discretion not to record particular parts of the meeting as required. This may be where the discussion involves sensitive matters and information, or concerns matters of a particularly sensitive nature where there is a risk of serious harm should the recording be accidentally or deliberately disclosed.

The Chair also has discretion to require that some content of the meeting should not be recorded in the minutes due to the nature of that material.

3.5 Information Asset Ownership

The Chair of the meeting is the Information Asset Owner for the recording of the meeting.



3.6 Retention of Recordings

All recordings to be held for 30 days after the following meeting. e.g quarterly meeting would be held for 4 months. Deletion will be authorised by the Chair at the meeting and the deletion decision will be recorded. In exceptional circumstances the Chair could determine that retention will be extended, the reasons for further retention will be recorded.

The responsibility for the review and deletion of meeting recordings sits with the chair and can be delegated to an appropriate person. E.g. Secreteriat.

PSD Retention of Microsoft Teams (M365) Recordings

PSD will seldom use record the recording function on Microsoft Teams to record meetings. If PSD do so it will be in line with this guidance, ie all recordings to be held for 30 days after the following meeting. e.g quarterly meeting would be held for 4 months.

There will be occasions when PSD use the Microsoft Teams recording function to record misconduct proceedings. This will only be used when circumstances necessitate the proceedings have to be conducted remotely. The recording will be saved to the relevant case folder and handled in accordance with the NPCC National Guidance on the minimum standards for the Retention and Disposal of Police Records 2017: PSD Complaints/Conduct and Vetting records.

All records will be allocated a MOPI grouping, which will determine the length of retention and disposal. At the end of the retention period a review will be conducted and if there is a need for a record to be retained for a specified longer period the rationale will be recorded using the National Retention Assessment Criteria (NRAC) form.

During the course of some misconduct proceedings there may be a need to transcribe the recording. If further retention of a record is required following a review and there exists a transcription of the recording, the audio file will be disposed of and the transcript only retained.

3.7 Information Security

The O365 platform is technically secure and access controls mean that only invitees to meetings can access recordings or transcripts.

The potential vulnerability of invitations being issued inappropriately to individuals will be mitigated by invitations being carefully checked before being issued, and the attendees checking at the commencement of and during the meeting that no unexpected parties are present.



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In addition, meeting chairs may require that meeting invitations are issued individually for each of a series of meetings rather than once for a series of meetings. This limits access by individuals only invited to one meeting occurrence to the recording of that particular meeting and no others.

Only Dyfed Powys Police recording equipment will be used to record a meeting.

3.8 Data Subject Rights

3.7 Data Subject Rights

Data Protection legislation gives individuals rights including the Right to be Informed, and Rights of Access, Erasure, Restriction, and Rectification. These are set out in detail in the force's Privacy Notice.

A data subject, whether a participant or not at the meeting, may exercise any of their rights in relation to their personal data captured in the recording of the meeting. Data subject rights applications may be made in writing or verbally and are processed by the Information Management and Compliance Disclosure Unit. The Information Asset Owner of the recording will be consulted prior to any response being made to the request for information.

3.9 Freedom of Information Act 2000 (FOI) & Environmental Information Regulations 2004 (EIR)

Copies of recordings of meetings may be sought under the FOI Act or EIR. Such applications can be made by any individual, but the rights may be limited by the use of exemptions to prevent disclosure in particular circumstances. They are processed by the Information Management and Compliance Disclosure Unit. The Information Asset Owner of the recording will be consulted prior to any response being made to the FOI Act or EIR application.



4.0 Consultation

Consultation		
ICT	Head of ICT Senior ICT Operational Manager ICT Product and Project Manager	29.01.21
IMBA	Information Security Officer Data Protection Advisor Disclosure, Records and FOI Manager	29.01.21
Information Management Sub-Group	Members of Information management Sub-Group	11.02.21
PSD	Senior Manager Professional Standards	05.03.21
Legal Services	Head of Legal Services	05.03.21
Governance and Change	Governance, Demand and Performance Manager	08.03.21

5.0 Monitoring and Review

The Head of ICT will review this procedure every two years. The review will take into consideration any legislative changes and any relevant procedural or structural changes within the Force.

6.0 Related policies, procedures or standards

- Data Protection Policy Guidance Document
- Data Protection Breach Policy
- Information Security Policy
- Freedom of Information Policy
- Information Sharing Policy
- Records Management Policy
- Data Protection Compliance Audit Policy
- ACRO Criminal Records Office Data Protection Breach Policy and Standard Operating Procedure
- College of Policing Authorised Professional Practice (APP) Information Management Guidance
- The National Police Chiefs Council (NPCC) Data Protection Manual of Guidance
- The Information Commissioner's Office's Code of Practice and Guidance

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7.0 Other source documents

e.g. Legislation, Authorised Professional Practice (APP), Force forms, partnership agreements (if applicable)

- The Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Freedom of Information Act 2000
- Human Rights Act 1998

Procedure Author: [REDACTED] Information Manager/Data Protection Officer

Procedure Owner: [REDACTED] Head of ICT