1 INTRODUCTION

1.1 This policy has been written to provide clarity for customers and staff about the circumstances in which meetings may be recorded by Stockport Homes, by customers or by partner agencies.

2 BACKGROUND AND CONTEXT

2.1 There will be occasions when customers, partner agencies or staff may want to video or audio record a meeting that takes place because other means of recording, such as note taking, are either unavailable to them or considered to be insufficiently reliable for their purposes. A policy is necessary because there have been requests to record meetings and sophisticated recording devices are readily available which make both overt and covert recording possible.

2.2 The policy complements Stockport Homes’ Data Protection Policy and links to the company’s aim to “Exceed customer expectations and always do the right thing”.

3 KEY PRINCIPLES

3.1 Stockport Homes will not ordinarily permit the recording of meetings. Formal meetings, hearings and appeals are minuted. Full written responses are provided to customer and staff queries and complaints. Opportunities are always available for these written records to be discussed and challenged by the people who were in attendance, so recordings are not normally necessary.

3.2 The making of secret recordings is strictly prohibited.

3.3 Anyone who wishes to record a meeting must make a request to do so, stating their reasons.

3.4 The right of an individual to refuse to be recorded will always be respected. No customer or member of staff will have his or her voice or image recorded against his or her will.

3.5 If a request to record is approved, the content of the recording may only be used by the person who requested it in accordance with Section 36 of the Data Protection Act. It must not be distributed, uploaded to the internet or social media or quoted selectively.

3.6 In the case of recording being approved, the recording itself will be made by Stockport Homes and this will be the responsibility of the meeting’s organiser. The original recording will be retained by Stockport Homes and a copy supplied to the customer, partner agency or member of staff who has requested that the recording is made.
4  APPLICATION OF THE POLICY

4.1 While Stockport Homes does not ordinarily allow recording of meetings the following factors must be taken into account when considering a request:

1. An individual’s right to privacy i.e. to not be recorded if they refuse;
2. An individual’s right to process personal data¹ in accordance with section 36 of the Data Protection Act. This section of the Act allows individuals to keep details about meetings they attend if these are for their own private purposes². Section 36 does not create a right to record, it governs how personal data, whatever format it is in, may be used;
3. The needs of the people attending the meeting i.e. consideration of reasonable adjustments in relation to disability;
4. What other means of recording the meeting are available e.g. verbatim minute taking; and
5. The subject matter of the meeting.

5  EQUALITY IMPACT

5.1 An Equality Impact Assessment has been undertaken to identify any differential impacts that this policy may have on diverse groups. Potentially differential impacts were identified in relation to disability and race. Disability-related issues are dealt with below. Language was identified as a race-related issue and would be addressed through provision of interpreters, referred to in section 5.5.

5.2 The Equality Act 2010 aims to protect disabled people and prevent disability discrimination. It provides legal rights for disabled people in the areas of:

- employment;
- education;
- access to goods, services and facilities; and
- buying and renting land or property.

5.3 Employers or service providers must make 'reasonable adjustments' to allow a disabled person to use their services – this includes removing barriers to participation and supporting the person requesting the adjustment.

5.4 Stockport Homes will fully support making reasonable adjustments where disability is a factor in a meeting participant wanting to record a meeting. These will take account of an individual’s needs and circumstances but typical examples of disabilities where some form of recording may be considered include:

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¹ See Information Commissioner’s Key Definitions of the Data Protection Act
² Data Protection Act – Section 36
• blindness or serious visual impairment;
• deafness or serious hearing impairment;
• learning disabilities, including literacy-related difficulties;
• conditions that adversely affect the ability to concentrate or retain information; and
• cognitive impairments, such as autism.

5.5 Examples of the types of adjustments that will be considered include:

• ensuring the meeting is in an accessible location that has appropriate acoustics, lighting and technology;
• ensuring the time and length of the meeting takes account of individual needs and providing breaks and refreshments as necessary;
• providing meeting materials in the most appropriate format;
• providing personal support to attendees, such as a reader, an interpreter or a remote minute taker – a palantypist;
• providing verbatim note taking;
• in the case of a complaint considering appointing an advocate at Stockport Homes’ cost;
• supporting the right of someone to be formally represented or accompanied by a friend; and
• recording the meeting in accordance with the principles in Section 3.

5.6 This list is not exhaustive and all reasonable options will be considered to ensure people can participate fully in the meetings that they attend. Further information about reasonable adjustments can be found on the Equality and Human Rights Commission\(^3\) and Citizen’s Advice Bureau\(^4\) websites.

6 REVIEWING THE POLICY

6.1 An initial review will be undertaken one year after the policy becomes effective and then on a three-yearly basis.

\(^3\) Equality and Human Rights Commission
\(^4\) Citizen’s Advice Bureau