

# ONVU Lesson Capture Privacy Notice



# HALCYON

# Purpose of the System

We use the ONVU Lesson Capture system to support teacher professional development. The cameras allow teachers to reflect on their own practice and, where they choose, share short clips with colleagues for coaching. This helps us deliver high-quality teaching and improve pupil outcomes.

This is **not** a surveillance system. The footage is not used for performance management, behaviour monitoring, or parental access.

## Lawful Basis for Processing

- **Teachers: Public Task** (UK GDPR, Article 6(e)) – schools have a statutory duty to secure high standards of teaching. The Teachers' Standards and appraisal regulations make professional reflection and CPD part of that duty.
- **Pupils: Public Task** – pupils are recorded only incidentally, because teaching cannot be meaningfully captured without the classroom context.

We have considered alternative lawful bases:

- **Consent** was rejected because in a 360° classroom recording it is not technically possible to exclude individual children, and consent could not be considered "freely given" in this context (ICO guidance states that consent is not valid where individuals have no genuine choice).
- **Legitimate Interest** was also considered, but as a public authority carrying out our statutory duties, Public Task is the appropriate basis.

# Why Lesson Capture is Necessary and Proportionate

- Traditional observations are intrusive and often distort normal classroom practice (“Hawthorne Effect”).
- Teacher Standards (2012) require teachers to “reflect systematically on the effectiveness of lessons and approaches to teaching.”
- Professional bodies such as the Chartered College of Teaching and the Teacher Development Trust highlight the benefits of classroom video for authentic professional development.
- Lesson capture enables genuine reflection and evidence-based coaching in a way that alternative methods (in-person observation, portable cameras) cannot achieve.

## Safeguards and Retention

- **Retention:** Recordings are automatically deleted after 30 days unless a teacher creates a short “clip” for CPD purposes. Clips are retained only as long as necessary for the training purpose (normally no longer than one year).
- **Access:** Only the class teacher can view their recording. They may choose to share a clip with another member of staff for coaching. ONVU staff cannot access the content.
- **Security:** Video is encrypted and stored on secure UK/EU servers (Amazon Web Services). Downloading to USB or external storage is disabled for staff.
- **Code of Conduct:** Staff are prohibited from re-recording or copying clips. Misuse is a disciplinary matter.

# Children's Rights and Privacy

- Pupils and parents will be informed when classrooms are fitted with ONVU cameras.
- As processing is on the basis of Public Task, consent is not required. However, parents and pupils may request that specific footage is not retained or shared beyond the automatic 30-day deletion cycle, and we will take reasonable steps to accommodate this.
- Footage will never be shared with parents or external parties, except if required by law (e.g. safeguarding investigation).

## Oversight and Accountability

- A full Data Protection Impact Assessment (DPIA) has been completed and will be reviewed annually.
- We have considered the Surveillance Camera Code of Practice and the Protections of Freedoms Act 2012. We believe there is a pressing educational need for this tool, and safeguards are in place to minimise risk.
- In the event of a data breach, the school will follow ICO reporting requirements and notify affected families without delay.
- Governors will review the system annually. Parents will be consulted on any significant changes.

## Your Rights

Under UK GDPR, you have rights including access to your personal data, correction, restriction, and objection. Parents may submit a Subject Access Request (SAR) on behalf of their child. Where this includes other children's data, the school will manage requests carefully and may arrange supervised viewing or redaction.