

FINDOCHTY COMMUNITY COUNCIL

Audio Recording Policy

Use of the Plaud recorder for minute-taking purposes

Authority	UK GDPR / Data Protection Act 2018 / Moray Council Scheme of Establishment (2025–2029)
Lawful Basis	Article 6(1)(e) UK GDPR - Public Task
Version	1.1
Date Adopted	[date]
Review Period	Annual

This policy sets out how Findochty Community Council uses audio recording to assist with the preparation of accurate minutes of council meetings. It applies to all public meetings of the Community Council.

1. Purpose

Findochty Community Council uses a Plaud audio recorder to record its meetings. The sole purpose of this recording is to assist the Secretary in preparing accurate written minutes. The recording is not the official record of the meeting - that role belongs to the approved written minutes.

The Plaud device uses AI assisted transcription to produce a draft transcript from the recording. This transcript is used as a working aid only and is not retained or shared as a document in its own right.

2. Lawful Basis

The processing of personal data through audio recording is carried out under Article 6(1)(e) of the UK GDPR - Public Task. The preparation of accurate minutes of community council meetings is a task carried out in the public interest and is a requirement of the Moray Community Council Scheme of Establishment.

3. Third-Party Processing

The Plaud device transmits audio to a third party AI transcription service to generate the draft transcript. This means that the audio recording - which may include the voices and contributions of members and members of the public - is processed by an external provider.

FCC has satisfied itself that the Plaud service operates in accordance with UK data protection law. Users of the Plaud service should be aware that audio is processed externally as part of the transcription function.

Where any participant has a specific concern about third party processing of their voice, they should raise this with the Secretary before the meeting begins. The council will consider reasonable requests on a case-by-case basis.

4. Transparency

FCC is committed to being open about the use of audio recording at its meetings. The following transparency measures are in place:

4.1 Agenda notice

The agenda for every meeting will include the following statement:

"This meeting will be audio recorded by the Community Council solely to assist in the preparation of minutes. The recording is processed using the Plaud AI transcription service. The recording will be securely stored and deleted once the minutes are approved. The official record of the meeting is the written and approved minutes."

4.2 Chair's announcement

At the start of each meeting, the Chairperson will make the following announcement before proceedings begin:

"Before we begin, please note that this meeting is being audio-recorded by the Community Council solely to assist in the preparation of accurate minutes. The recording is processed using the Plaud AI transcription service. It will be securely stored and deleted once the minutes are approved at the next meeting. The official record will be the written minutes."

5. Who Makes and Accesses the Recording

The recording will be made by the Chairperson, Secretary or another authorised officer of the Community Council. Access to the recording and the draft transcript is restricted to:

- the Secretary, or another authorised member responsible for minute taking
- the Chairperson, where access is needed to resolve a specific dispute about what was said

The recording and transcript will not be shared with any other person except where required by law or where a formal complaint, subject access request, or legal matter makes it necessary.

6. Storage and Security

The audio recording and any draft transcript will be stored securely:

- on the Plaud device, which is password protected
- within the Plaud account, which is protected by a strong password and two factor authentication
- access to the Plaud account is limited to the Secretary or another authorised officer

Recordings will not be stored on unprotected devices, shared drives accessible to non authorised persons, or transmitted via unencrypted email.

7. Retention and Deletion

Recordings and draft transcripts will be deleted as soon as the minutes have been approved at the subsequent meeting. A log of deletion dates will be maintained by the Secretary.

Exception: where a formal complaint, subject access request, freedom of information request or legal matter is in progress at the point the minutes are approved, the relevant recording will be retained until that matter is resolved. The Secretary will note the reason for extended retention in the deletion log.

8. Rights of Participants

All individuals whose voices are captured in a recording have rights under UK GDPR in relation to that data. These include:

- the right to be informed that recording is taking place - met through the agenda notice and Chair's announcement
- the right of access - to request a copy of the personal data held about them in the recording, before it is deleted
- the right to object - to raise concerns about the processing of their personal data

Requests should be made in writing to the Secretary and will be handled in accordance with the Data Protection Policy.

9. Third-Party Recording by Members of the Public or Press

This policy applies only to recordings made by the Community Council using its own equipment.

Any member of the public or representative of the press who wishes to record a meeting must submit a written request to the Secretary in advance of the meeting. The Community Council will consider such requests and respond before the meeting begins. Approval is at the discretion of the council and is not automatic.

10. Review

This policy shall be reviewed annually and updated as required. Any material changes will be approved by the Community Council at a meeting.

Adopted by Findochty Community Council on: _____

Signed (Chairperson): _____

Signed (Secretary): _____