Protecting Student Privacy in Zoom Recordings

General Information about Zoom and Zoom Recordings

Zoom meets BYU’s privacy and security standards, including FERPA and GDPR requirements; however, Zoom’s recording feature is subject to the limitations set forth below.

FERPA: It is acceptable for students to see other students enrolled in the same section of a course and share their personal information in a Zoom meeting.

GDPR: Zoom features an explicit consent mechanism for EU users. Existing or new users coming from IP addresses detected from the EU will be presented with a one-time privacy policy update.

When Recording a Zoom meeting: Although Zoom displays a notification when a meeting is recorded, the meeting host should inform the participants of the following:

1. The Zoom meeting will be recorded
2. Why the Zoom meeting is being recorded (purpose)
3. Whether and to whom the recording will be disclosed (shared)
4. How long the recording will be retained (retention)

If only one Zoom session is recorded, these four points should be announced at the beginning of the meeting. If multiple sessions are recorded, an explanation as to purpose, etc. can be included as a syllabus statement.

If a Zoom recording is used to evaluate student performance as related to the determination of a grade, best practice suggests that recording should be retained for a year. This same guidance applies to other records of student achievement—paper or electronic.

Should I record my live classes and/or meetings when held online?
Most faculty members find that recording classes is their best tool to accommodate students who are unable to attend or who have been instructed to stay home. In a non-COVID environment recordings of a class meeting should be made only when there is a clear educational purpose.

Is a recorded class/lecture/meeting (audio or video) a protected student record?
If a recording includes only the instructor’s voice, image, and/or other personally identifiable information, the recording is not a student record and FERPA does not limit its use. If the recording includes students asking questions, making presentations or leading a class (other than teaching assistants), and/or it is possible to identify students, then the portions containing recordings of the
students do constitute protected educational records. Educational records can only be used as permitted by FERPA or set forth in a written consent signed by the student.

May a recording that includes student participation be posted for other class members to view or listen to?
Yes, but only if access is limited to other students in the same course and section. In that case, FERPA does not require student written consent. This allows instructors to create access for students in the course to watch or re-watch past sessions.

Can an instructor allow individuals outside of a class to access a video of that class that includes student participation?
No, instructors may not share or otherwise allow access to recorded instructional materials that include students’ images, voices or other personally identifiable information without obtaining a FERPA consent from every student.

In order to share materials that include students’ images, voices, personally identifiable information or other educational records, the instructor must obtain a written FERPA consent from each student who can be seen or heard in the recording or whose other educational records will be released. Written consent should be for a specific purpose and not a blanket consent for any and all future use. A form template is available to download:

**Informed Consent for Class Recordings** – Use this form to obtain consent from students when using a class recording for a different section of the same course during the same semester.

**Non-LMS Option Release for Class Recordings** – Use this form to obtain consent from students when using a class recording for any other reason.

**Edited Recordings** — Recordings can be edited to omit any student who has not consented to the use of their voice or image or to de-identify the student in the recording (which can include avoiding or removing any mention of the student’s name, blurring the student’s image, altering voice recordings, etc.). CTL consultants are available to help as needed.

Instructors can also plan recordings so that students (such as those asking questions during a class) are not shown in the video or referred to by name (another way to de-identify the student).