

VIRTUAL RESEARCH INSTITUTE LLC

Session Recording, Privacy and Safeguarding Policy

Structural safeguards, limited exception recording, private symposium access, and recording-
data controls

Organization: Virtual Research Institute LLC

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Applies To: Students age 13+, parents/guardians, mentors, staff, contractors, guests, and
VRI-controlled online sessions

Policy Statement. This policy establishes VRI's standard non-recording model for routine sessions, the controls for approved recorded one-to-one exceptions, and the rules for private symposium recordings. It is intended to protect students, minimize recording of minors, preserve appropriate evidence when a limited exception applies, and give families clear notice and controlled access.

Relationship to Other Documents. The Policies & Procedures Manual and Student Code establish the public framework. This policy supplies the operational recording and safeguarding controls. De-identified Public Research Archive publication and any separate publicity permissions remain distinct from private program recordings.

Contents

1. Purpose and Policy Objectives
2. Scope and Definitions
3. Routine Session Safeguarding Rule
4. Single-Student Attendance and Approved One-to-One Exceptions
5. Symposium Recordings and Family Access
6. Family Accommodation Options
7. Notice and Acknowledgment
8. Platform and Technical Controls
9. Access, Storage, Security, and Retention
10. Prohibited Conduct
11. Complaints, Incidents, Sensitive Disclosures, and Preservation Holds
12. Roles and Responsibilities
13. Required Records and Communications
14. Institutional AI and Derivative Records
15. Implementation Controls
- Appendix A.** Standard Family Notice
- Appendix B.** Mentor Opening Script

1. Purpose and Policy Objectives

VRI uses structural supervision as the primary safeguard for routine online research sessions. Routine Research Circle and Research Team sessions are not recorded. Recording is limited to a pre-approved one-to-one exception or to a cohort symposium or final presentation event governed by this policy.

- Prevent unsupervised mentor-minor contact during routine sessions.
- Minimize unnecessary collection of video and audio involving minors.
- Use VRI-controlled systems, access restrictions, retention schedules, and preservation holds.
- Give students and families clear advance notice of symposium recording and cohort-family distribution.
- Keep de-identified Public Research Archive publication and any publicity decisions separate from private program recordings.

2. Scope and Definitions

This policy applies to VRI-administered live online sessions in which a mentor, staff member, contractor, guest, or reviewer interacts with one or more students through a VRI-approved platform. VRI does not enroll students under age 13.

Routine session. A scheduled Research Circle or Research Team meeting conducted with at least two students present and not recorded as a standard practice.

Approved one-to-one exception. A specific mentor-minor session approved in writing by VRI before it occurs. Recording through a VRI-controlled account is the required compensating control.

Symposium recording. A private VRI-controlled recording of a final cohort symposium or presentation event that is shared only with approved families in that cohort and is not published in the Public Research Archive.

Preservation hold. A documented instruction suspending ordinary deletion because a complaint, incident, legal issue, insurance matter, payment dispute, or investigation is pending.

3. Routine Session Safeguarding Rule

- Routine Research Circle and Research Team sessions are not recorded.
- At least two students must be present throughout every routine mentor-led session.
- A mentor may not continue a routine session alone with one minor.
- Private breakout rooms or subgroups may not pair one mentor with one minor. A breakout must include at least two students, a second authorized adult, or another VRI-approved supervision structure.
- Mentors must use VRI-approved meeting, chat, communication, and file-sharing systems.
- Mentors must maintain required attendance records and session summaries.
- VRI may conduct periodic live observation or quality review through an authorized administrator.

4. Single-Student Attendance and Approved One-to-One Exceptions

If only one student is present for a routine session, the mentor must end and reschedule the session. The mentor may not improvise a private session, move to a personal account, or rely on informal parental permission.

A one-to-one session may proceed only when VRI approved the exception in writing before the session. The approval must identify the purpose, participants, date or authorized window, platform, recording requirement, and responsible reviewer.

- The session must be hosted and recorded through a VRI-controlled account.
- Local recording and storage on personal devices or personal cloud accounts are prohibited.
- Access is restricted to the Executive Director or another authorized safeguarding or program administrator.
- The recording is normally deleted 90 days after the end of the relevant program term unless a preservation hold applies.
- The student and parent/guardian receive advance notice of the exception and recording.

5. Symposium Recordings and Family Access

- VRI symposiums and final cohort presentation events are recorded through a VRI-controlled account.
- Each family in the cohort receives a secure, account-restricted link and may therefore view presentations by other students in the same cohort.
- The recording is not published in the Public Research Archive and is not a public media release.
- Access is view-only by default. VRI may provide temporary download access or a controlled copy upon a verified request.
- Families may not publicly post, redistribute, screen-record, or use the recording for unrelated purposes.
- Symposium recordings are normally retained for 3 years. Cohort-family access ends when the recording is deleted.
- The recording link should be delivered individually or through a privacy-preserving communication that does not reveal family email addresses.

6. Family Accommodation Options

A family should request a recording accommodation before the symposium when reasonably possible.

- Image-only concern. The student may participate with the camera off, use an approved display name, and present through shared slides. This does not necessarily remove the student's voice, slides, or contributions from the recording.
- Objection to any recorded inclusion. VRI may approve a separate unrecorded presentation or equivalent completion activity. A separate live presentation must include a parent/guardian, VRI administrator, or another approved participant so that structural safeguarding remains in place.
- VRI is not ordinarily required to blur, edit, redact, or reconstruct a completed cohort recording. VRI may do so when necessary for safety, privacy, legal compliance, or correction of an accidental disclosure.

7. Notice and Acknowledgment

Symposium recording is disclosed as a program practice through advance notice, not as optional publicity consent. Registration and onboarding materials must clearly distinguish:

- non-recorded routine sessions and the two-student structural safeguard;
- recorded approved one-to-one exceptions;
- private symposium recording and cohort-family distribution;
- de-identified Public Research Archive notice; and
- optional media, testimonial, and publicity permission.

8. Platform and Technical Controls

- Use a VRI-owned or VRI-administered platform account.
- Disable local recording and participant recording permissions whenever technically available.
- Use authenticated access, waiting rooms, unique links, and controlled screen sharing where available.
- Disable automatic transcripts, AI summaries, facial recognition, emotion analysis, and similar derivative features by default.

- Use role-based access and multi-factor authentication for administrators.
- Maintain access logs or audit history where available.

9. Access, Storage, Security, and Retention

Record category	Access	Ordinary retention
Routine sessions	No recording created	Not applicable
Approved one-to-one exception recording	Authorized VRI personnel only	90 days after term end
Symposium recording	Authorized VRI personnel and approved cohort families	3 years after symposium
Preservation-hold material	Persons authorized for the matter	Until hold release and then applicable schedule

- Recordings must remain in VRI-approved encrypted cloud storage.
- Files should use non-identifying or minimally identifying names.
- Recordings may not be emailed as attachments or copied to personal drives.
- Temporary exports must be deleted promptly after the approved purpose is complete.
- A family download request must be verified. Once a family downloads a file, it is outside VRI's technical control, but redistribution restrictions remain applicable.

10. Prohibited Conduct

- Personal or local recording by a mentor, student, parent, guest, or staff member without written authorization.
- Downloading, copying, screen-recording, photographing, transcribing, posting, or redistributing a session outside the approved process.
- Uploading raw recordings to general-purpose AI tools or using recordings for model training, biometric analysis, sensitive-trait inference, or synthetic media.
- Using a private symposium recording for advertising or publicity without separate written permission.
- Editing or selectively presenting a recording in a misleading manner.
- Retaliating against a person who raises a privacy, recording, or safety concern.

11. Complaints, Incidents, Sensitive Disclosures, and Preservation Holds

When VRI receives a complaint or identifies a concern, the designated reviewer must determine promptly whether related recordings, chats, attendance logs, session summaries, and files should be preserved. A recording is evidence, not automatic proof, and must be evaluated with context and other relevant records.

A mentor must not promise secrecy or conduct an independent investigation when a student discloses abuse, exploitation, self-harm risk, threats, medical information, or another sensitive matter. The mentor must follow VRI incident-reporting and escalation procedures.

12. Roles and Responsibilities

- Executive Director: policy authority, written exception approval, high-risk access decisions, and final institutional action.

- Safeguarding or Program Lead: incident review, preservation holds, access logs, and restricted-record handling.
- Mentors: two-student rule, approved channels, no personal recording, attendance records, session summaries, and immediate escalation of concerns.
- Operations or Technology Administrator: account controls, access provisioning, secure storage, deletion, audit evidence, and family-link administration.
- Students and families: approved access, no redistribution, timely accommodation requests, and prompt reporting of concerns.

13. Required Records and Communications

- Registration acknowledgment containing the routine-session safeguard and symposium notice.
- Mentor safeguarding and recording acknowledgment.
- Approved one-to-one exception record.
- Symposium access list and delivery log.
- Recording access log and download-request record.
- Preservation-hold record and deletion log.
- Public Research Archive notice and any separate optional media or publicity permission requested for a specific use.

14. Institutional AI and Derivative Records

- Raw recordings will not be uploaded to ordinary AI tools for routine analysis, summarization, assignment, or quality review.
- A purpose-specific exception requires a documented purpose, approved registered system, minimum-necessary data plan, restricted access, and a defined deletion date.
- An approved transcript or summary is a separate record with its own access and retention rules and does not extend source-record retention without a documented reason.

15. Implementation Controls

- Configure the approved meeting and storage systems.
- Train mentors on the two-student rule, one-student attendance response, approved exception process, and symposium notice.
- Implement the registration and mentor acknowledgments.
- Create access, download-request, preservation-hold, and deletion procedures.
- Audit compliance before the first live term and after any material platform or policy change.

Appendix A. Standard Family Notice

Routine Research Circle and Research Team sessions are not recorded and require at least two students to be present. VRI symposiums and final cohort presentations are recorded through a VRI-controlled account and shared by secure, restricted link with the families of that cohort. Other cohort families may therefore view your student's presentation. Access is view-only by default, download may be provided upon request, and the recording is normally retained for 3 years. The recording may not be publicly posted or redistributed. Camera-off participation or a separate unrecorded presentation may be requested in advance.

Appendix B. Mentor Opening Script

Before a routine session: "This routine VRI session is not recorded. Our safeguarding rule requires at least two students to be present. Please use only the approved meeting, chat, and file systems."

Before a symposium: “This VRI symposium is being recorded through a VRI-controlled account and will be shared by restricted link with the families in this cohort. It is not a public recording and may not be redistributed.”