Live streaming or filming church services as we reopen

If the celebrant is alone, with no congregation, there are no data or safeguarding problems generally, apart from managing the technology.

If some congregation are attending as well, and the service is to be live streamed or recorded for others to participate in or watch later, there are a number of safeguarding and data protection issues to be taken into consideration. It will be hard to control who sees images streamed or recorded for broadcast and children and vulnerable adults must be protected. Data must be protected and this includes images of attending members of the congregation. Get PCC resolution to confirm agreement to policy conditions of live streaming/ recording. Benefice could have standard conditions and each PCC adopts policy.

General Principles

- Place cameras so that they don’t show more people than is necessary.
- Only people who have given their consent to appear on screen should be shown.
- It should be made clear to everyone at the event (by notices or announcements) that it is being live-streamed or recorded.

Safeguarding

- Generally, cameras should only show those who are participating in the leading of the service.
  - If you do wish to show shots of the congregation, families with children or young people attending should be provided with the option to sit in an area which is not visible in the recording/streaming (eg. use one aisle out of shot or otherwise angle the camera to ensure an area is not visible to viewers).
  - There may also be adult members of the congregation who for a variety of reasons wish to attend in full privacy. They may, for example, not wish their whereabouts to become known to a former partner with whom they suffered domestic abuse. People in these types of circumstances should also be afforded the option to sit in an area not covered by any cameras or recording equipment.
- Anyone coming forward to receive communion or other sacraments should normally be out of shot, both for safeguarding and privacy reasons, but also due to the particular solemnity of this part of a service.
- Relaying or recording sound only is unlikely to cause an issue as individuals will not normally be identifiable.

Data Protection

- If filming or recording is usually done in your church, it should be covered by your existing GDPR consent forms or the legitimate interest base for processing personal data. Otherwise specific consent is needed to film the congregation attending the service (either live-streaming or recorded) as opposed to the celebrant and readers etc delivering the service.
- Before attending a service which is to be streamed or recorded, a notice should be clearly visible at the entrance to the church, informing the congregation that the service is to be live-streamed or film recorded, and advising them of seating areas which will NOT be filmed, if they do not wish to be identifiable during the service. So long as this advance warning is given (put it on the website/social media too) and the notice includes a statement that they
will be presumed to have given consent if they attend the service after seeing the notice, written consent is not needed.

- Announce that the service is being live-streamed/filmed before the start of the service.

Faculty issues

Any installation of permanent CCTV facilities requires a faculty, but temporary installation including attaching to the fabric of the building can be covered by an archdeacon’s temporary reordering licence for a period of up to 24 months, using Form 9. (See Faculty Jurisdiction Rules 2015 Rule 8.2.)

Any queries:- Talk to your archdeacon or the Registry by email to registry@salisbury.anglican.org

18th June 2020 (revised 12 October 2020)