

Policy for Live streaming or filming church services at Harpenden St John Parish

Drafted: 11th July 2022
Approved by PCC: 14th July 2022
Review Date: 14th July 2023 (or two months after any new camera system is introduced, if earlier)

Introduction

This policy is intended to set out how we live stream church services, whilst still ensuring we do not breach safeguarding standards, data regulations or licensing requirements.

It covers both the current arrangement and possible future arrangements, which could include the congregation (as a whole) in view at times in the live stream.

Licensing

What do we need for Church Services and why?

It is St John's Policy to comply with relevant copyright requirements (it is illegal to use copyrighted material without a license). Consequent to this, we will acquire appropriate licenses and ensure that we check whether words, music and other materials we use are either (1) not in Copyright; or (2) covered by one or more of the licenses we possess.

The minimum licenses that we will hold are as follows:

1. **A Church Copyright License** covering St John's for the use of copyrighted material (covered under that license) including music and lyrics in hymn sheets and service sheets. This does not cover streaming of music or the use of DVD clips in recordings.
2. **A Streaming License** covering St John's for live streaming. This is to cover:
 - live worship music performed as part of that stream.
 - the right to show the words on screen.
 - allows us to make recordings of the services available on our website indefinitely provided we keep renewing our streaming licence.

Note: If we wish to use recorded music as part of the stream, additional rights come into play. Commercially available CDs or music recordings cannot be played unless specific permission is granted by the copyright holder.

We will ensure that we comply with the disclosure requirements of our licenses – eg mentions in service descriptions.

If we are to use material that is copyright and not covered by our licenses, then permission must be sought from the owner(s) of any other creative works to be included in the service.

In the case of Weddings, Funerals etc, we make it the responsibility of the service designer to ensure hymns, music etc to be used are legally broadcastable by St John's – whether that

is via coverage from our licenses or other licenses available to the service designer (or that it is copyright free).

Notes:

- If reproducing bible verses, or liturgy, usually there will be copyright information in the front of the publication, and usually they will allow for a certain proportion to be reproduced.
- For any images etc. the same rules would apply as in normal circumstances. Never assume that you can take an image found on Google and use it in a church service or include it in a service sheet or similar without permission.

Data and Safeguarding

Note: Relaying or recording sound only is unlikely to cause an issue as individuals will not normally be identifiable.

If the celebrant is alone, with no congregation, there are no data or safeguarding problems.

If a 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.

The PCC sets the following conditions for St John's to live stream or record a service.

Safeguarding – Congregation

All families with children or young people – and indeed anyone attending are to be able to sit in an area which is not visible in the recording/streaming. We recognise that there may be members of the congregation who prefer to attend in privacy. They may not wish their whereabouts to become known to an abuser for instance.

Note: At the time of approval, our normal practice is not to film the congregation, and only film those celebrating the service (including Intercessors and Readers) and the choir. Future arrangements may change this; it will be our policy to:

1. Only show the congregation “en-masse” and not to focus on an individual or small group, unless that individual / group has given us explicit permission. In this context, Choir members will be treated in the same manner – ie any plan to focus in on an individual member will only occur if explicit permission has been given (note: this does not ‘override’ the implied permission to broadcast given by agreeing to read a lesson et al.
2. To designate a part of the area used by the congregation as “no film” and state where this location is at the entrance to St John's.

It will remain our policy not to film those receiving communion, other than the Celebrant and those that will assist with the Communion such as the Deacon for the Day. The camera should be pointed elsewhere during this time or a full screen static image displayed.

On occasion, we may have non-standard filming arrangements: eg for an in-service Baptism or on Remembrance Sunday. It will be our policy to review our “no film” location for that service and to make sure the revised area is suitably publicised.

Where we film a service that it is not our custom & practice to film then our stance is to make it clear that filming will happen in publicity and if it is to be a one-off for a regular service then prior notice is also to be given.

Safeguarding – Those Leading the service

Adults (other than the vulnerable) leading the service – including the choir (en masse) – are considered to have deemed to give permission to be filmed by agreeing to take on the role. It will be our policy that those visiting St John's (eg a guest President and/or Preacher) are advised at the time of invite that the service is to be live streamed – and if this becomes our intention after the invitation is accepted, they are appropriately advised.

Written permission (this to include electronic submission by Google form or email) is required before Vulnerable Adults and Children can be involved in leading a live streamed service. Where a general permission has already been given for other activities (eg Junior Church), we do not consider it necessary to obtain further approval.

Permission for Children is to be obtained as follows:

1. Children under the age of 13: consent to be gained from their parents or carers.
2. Children aged between 13 and 16: consent should be gained from both parents / carers and the children themselves.
3. Children aged 17: consent should be gained from the children themselves.

Data Protection

Note: If filming or recording is usually done in a church, it should be covered by 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 livestreaming or recorded) as opposed to the celebrant and readers etc delivering the service.

St John's Policy is:

1. A notice is to be clearly visible at the entrance to St John's 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 seen on camera during the service.
2. So long as this advance warning is given and mentioned 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.

3. The minister will advise Baptisms, Wedding and funerals families of the possible of use of a camera and the data protection and safeguarding implications.
4. This approach will be used at the Parish Eucharists, Daily Office and occasional offices as needed.

Retention of Live Streams

Live Streams will be retained after broadcast for later viewing by those unable to watch at the time. However, this intention is not to be indefinite.

We will adopt a two stage process, which will apply to both live streams and to other uploaded material:

1. It will be hidden from general view by marking as “Private” (YouTube) or other equivalent activity. Marking as “Unlisted” in YouTube (or other equivalents) will not be regarded as delivering this, except in the unlikely scenario that the link address is not believed to be publicly available.
2. It will later be deleted.

We will operate to the following timescales:

1. Specific extracts, one off uploads & lockdown specials can be kept visible indefinitely from the perspective of this Policy ~ it may well be retired for other reasons, including the passage of time and new content on the same topic – eg the Marks of Mission sermons are reasonably kept until the Parish Centre is built.
2. Regular services on special days (eg Christmas) are kept visible until the next time (ie a year for Christmas Day and around a year for Easter so there is always one service visible
3. Special services are kept visible for a year – for Funerals, Weddings et al this will be varied in accordance with the wishes of the family, the happy couple etc.
4. Other services (eg most Sundays) are kept visible for a month.
5. That we will on request, consider marking services as Private earlier and also deleting earlier (but early deletion to be publicised to the safeguarding officer and the vicar, in case of other needs to retain).
6. Content will be deleted twelve months after the times outlined above.
7. It will be acceptable, on specific request to keep them Publicly visible or in a Private state for longer – to be agreed on a case by case basis by the Vicar or a Warden.

The archiving process is to be a monthly one – so, eg, a service on approval day is likely to become Private at the end of August / early September, and be deleted at the end of August / early September 2023.

Outline form

Note 1: the form content may be revised in small ways as needed without need to revise this policy. The St John's Safeguarding Officer, if not the initiator of the change must give this policy

Note 2: the form may be completed on paper or electronically. In the case of children aged between 13 & 16 the electronic form is to be completed twice, once by the child and a second time by a responsible adult.

Live-streaming Permission Form

Please sign below accordingly:

Name: _____

Adult: Child 17+: Child 13 – 16: Child 12 or under:

Role(s): _____

Ongoing: One off: Date: _____

I give permission for my image/person (or my child's image) appearing in the filming/live-streaming of a service used by St John's Church on the internet.

The images will not be used for any other purpose, although we cannot guarantee this in areas beyond our control, for example, websites are available world-wide where UK law would not necessarily apply.

I understand that under the General Data Processing Regulation (GDPR) I have:

- The right to be informed of the purposes for the collection of this data.
- The right to access data held by the church.
- The right to rectify any erroneous data.
- The right to erasure (to be forgotten). However, once a clip/film is published on the internet, it is difficult to fulfil this criterion, should the occasion arise. I am aware of this.
- The right to restrict processing of this data and to object to it being used for any other purpose than that stated, and the right to complain to the Information Commissioner in the case of any misuse or data breach.

Signed – Person: _____

Signed – Person: _____

Date: _____