

PCC policy and practice for live streaming or recording of services - guidance and suggested wording

Introduction

In all cases where services or other events are being broadcast on the internet or through the use of social media platforms either by live streaming or recorded for later transmission, it is important that the PCC thinks through and documents its policy and good practice concerning the issues that may arise.

The PCC should consider and document protocols concerning issues arising from the live streaming of services, including safeguarding, data protection and copyright licensing.

The PCC's consideration of these issues will clearly depend on the nature of the live streaming or recording facility. If a camera is to be used in a fixed position which will only have, for example, the Incumbent in view (and no-one else) and if no music or texts other than those of authorised Church of England liturgies are being used, then the consideration should be a relatively straightforward matter. Where members of the congregation are visible (especially if there are children present), some hymns or worship songs are used or where recorded music is played, or where information is given out for example in the notices which may relate to identifiable individuals, a rather wider set of considerations come into play.

Please note that the PCC should consider its policy and practice for live streaming or recording services, even if no fixed equipment is used. If you do wish to use fixed equipment, you will need to obtain a faculty (which may be an Interim faculty).

This template is intended for general guidance only. Please contact your Archdeacon, the Diocesan Registry or the DAC Secretary if you have any queries.

Your context

Section 1 - What do you want to do/what are you currently doing?

- How will services/events be broadcast (i.e. live streamed; recorded; streamed and then made available for a further period)?
- What platform will be used (e.g. YouTube, Facebook Live)?
- If recordings will be kept, how long will they remain available to view?
- Will occasional offices (baptisms/weddings/funerals) be broadcast?
- Will concerts/recitals or other performances or events be broadcast?

Section 2 - How are you live streaming or recording?

Guidance - <https://www.churchofengland.org/resources/digital-labs/blogs/simple-livestream-or-recording-set>

<https://www.churchofengland.org/resources/digital-labs/blogs/guide-getting-started-live-streaming>

- Do you use one or more cameras? Are they fixed or mobile?

- If a single fixed camera is used, does it have only the celebrant/service leader in view?
- Are areas of the church in view including people standing near the front e.g. choir, children returning from separate activities, worship band
- Are areas in the church in view including (parts of) the congregation or particular areas (pulpit; font; organ)?

Section 3 - What is included in the service?

- Are you only using authorised Church of England liturgies without music or other texts?
- If you are using music or other texts, are you clear about the licensing requirements relating to the broadcasting of copyright material or recorded performances using a particular platform? See:
- <https://www.churchofengland.org/resources/digital-labs/blogs/what-you-need-know-about-using-photos-and-video-online> and <https://www.churchofengland.org/resources/digital-labs/blogs/beginners-guide-going-live-your-service-or-event-free>
- Have you obtained the relevant licences? See: <https://uk.ccli.com/streaming/>. Please note that churches using Zoom to stream services need both the CCLI Streaming Licence and the [PRS for Music LOML](#). This is because Zoom doesn't currently have an agreement with PRS for Music as YouTube and Facebook do.

Policy and practice - your document

Based on your answers to the sections above, please write down your policy and practice under the three headings of Safeguarding; Data protection; Copyright Licensing. You may wish to use some of the wording suggested by other parishes (below) or describe your local practice in your own words.

- Discuss your document and practice at a PCC meeting and approve the document, once finalised.
- Ensure you communicate the policy and practice to all those involved in supporting streaming of services (including those participating in readings, music, etc as well as those working the technology)
- Make sure you publicise the policy and arrangements to people attending services in person, including visitors. Make sure everyone is comfortable with the arrangements and especially parents/guardians of children (with consent where required) and vulnerable adults.

Examples of wording

Why a Policy is needed:

- We wish to (a) stream services that cannot be attended by parishioners or the wider community for whatever reason; (b) make recordings of services available for those who wish to see or hear them again; (c) be able to offer streaming for weddings, funerals, baptisms and other such events in church; and (d) support civic events, e.g. services (remembrance, St George's Day) and concerts.
- The platform to be used is [YouTube].
- An operational policy has been drawn up to be used in the varied situations outlined above.

- At all times the safeguarding of the people is our high priority as well as being able to deliver our worship to the wider world.

Safeguarding

As a PCC, we will:

- understand exactly where in the building people entering, leaving or circulating might come into the view of cameras.
- provide for people attending worship to choose whether they place themselves in part of the building that is included in streaming or a part that is excluded
- Notify people in advance, with signage at entrances and on service sheets, that the service is streamed.
- State that streaming does not normally include images of the congregation, but of the ministers and leaders. Any images of the congregation will be distant or in passing. Images of people in close up, praying, or at the communion rail should be avoided.
- Signpost an area of the church which is guaranteed to be free of image recording.
- Obtain written consent from any member of the congregation taking part in the service in a capacity where they will be prominent in the streamed video, ie reading scripture, leading intercessions or children coming to show and tell what they have done in Children's Church or Sunday School.
- Only name people in broadcast intercessions with their consent.
- Make every effort to obtain the formal written consent from all children's parents/carers/guardians prior to broadcasting as best practice (although recognising this is not always achievable in practical terms):
- Children under the age of 13: consent should be gained from their parents;
- Children aged between 13 and 16: consent should be gained from parents and the children themselves;
- Children aged 17: consent should be gained from the children themselves.
- Provide advice on how and who someone should contact if they give consent but subsequently withdraw it. As a PCC we will need an internal process in place to address this in a timely manner (this is usually referred to as 'the right to be forgotten'), with the ability to remove locally stored and online files. It is also important to have this process in place should any urgent or new safeguarding incidents present themselves subsequent to assumed consent.

[Alternative for simple one-camera context]

- A single fixed camera is being used. Those being filmed are the Celebrant, serving team, lesson readers, intercession leaders and churchwardens, all of whom by virtue of offering public worship, have given implied consent to be filmed unless any of them are minors in which case explicit consent has been obtained.
- [Musicians: The choir is [out of range of the camera]. [The choir does not process in view of the camera.] The organist is [not] visible...
- The congregation will not be filmed at any time during the service, and a statement will be displayed in church and on the weekly pew sheet confirming this. In view of the above, no additional safeguarding issues relating to filming are perceived.

Data Protection -

Guidance: <https://trurodiocese.org.uk/resources/policy-governance/data-protection/>
<https://www.parishresources.org.uk/gdpr/>

1. The basis for processing personal data arising from live streaming public services is that worshippers have chosen to make their religious affiliation public in attending public worship. We need not seek the consent of each person attending the services of public worship, but we will ensure that everyone has the opportunity not to be filmed, if that is their wish. Otherwise assent may be assumed.
2. Our publicity, service announcements and signage will ensure that all people attending our public worship services know when the service is being live streamed. [Signage will be placed at entrances and on service sheets to indicate:
 - that the Service is to be live-streamed,
 - that live-streaming does not normally include images of the congregation and
 - that any images of the congregation will be distant or in passing.

Members of the congregation will be advised on entry and via our publicity, where to sit if they wish to be out of camera shot. [As far as is practicable, a route through the church will be provided during services which is guaranteed to be free of image recording.] [Anyone worshipping in church who does not wish to have their image shown shall be free to indicate this and this will be respected].

3. Where possible, the names of those attending [remotely / via Zoom] will be removed from the screen before livestreaming takes place. Where people are joining a Service remotely, advice will be given that, should they not wish their image to be shown, they should switch off their camera.
4. Camera operators will be given clear direction to ensure that the camera angles only capture [description of area] for the [xxx] service [add details for other services as required]. All cameras will point only at ministers and others leading the service (scripture readers, intercessors etc), closely framing them and minimising the risk of images of members of the congregation also being streamed.
5. Personal privacy will be maintained during the administration of Holy Communion. Images of people in close up, praying, or at the communion rail will, as far as possible, be avoided. A gently moving image will be substituted for the live images for the duration of communion, indicating that the live images will resume shortly.
6. There should be contingency planning that includes using alternative images or halting streaming if there is any disruption of a service or a need to evacuate the building.
7. Consent to live streaming [will be assumed for everyone who volunteers to be on a rota of] [has been obtained from] musicians, intercessors, lesson readers and other roles which may arise from time to time in a service [but see section on Safeguarding above].
8. The service will be streamed on the [xxx] platform via [our website and/or Facebook]. Recordings will remain on the website for [1 week / xxx months], after which they will be archived, and access restricted to the website and [platform] administrators. Once archived, recordings will not be broadcast again without the permission of the principal participants and anyone else who can be clearly identified in the images.

Additional and alternative wording

1. Information will be displayed in church about the GDPR requirements for those who will be filmed and our GDPR policy will be updated in future to include live streaming.

2. Weekly notices: These will be given before streaming.
3. Intercession: The sick are not prayed for by name unless they have given consent.
4. Data storage, retention and accessibility. The data, once filmed, is held by the church in accordance with the church's Data Protection Policy and relevant legislation. Streamed data is uploaded to YouTube/Facebook and is covered by their own data protection policies and relevant legislation. Publicly available online data can be viewed, saved and shared openly across social media platforms and whilst we can delete data held locally by ourselves and remove them from public view on social media, the retained files will be covered by the social media provider's data retention policy.

Copyright Licensing - see <https://uk.ccli.com/streaming/>

1. No texts other than those authorised by the C of E will be used.
2. We hold the following CCLI licences... or Our copyright licence has been amended to include live streaming and recording.
3. Service leaders and preachers will ensure that all visual images displayed during services fully comply with copyright.
4. [The Director of Music] will oversee the music and any copyright issues and if required we shall extend our existing CCLI licence. Where musicians are performing live, specific agreement with musicians involved in the service will be obtained, confirming that they are willing to be included in a livestream or recording.

Occasional offices: These are dealt with on an individual basis and will need to be discussed with each party as it occurs as each will have different needs. For example, these events could include processional shots, high altar, chancel and other camera angles. A fee will be set, and it will be possible for recordings to be made available.