

Live Streaming Policy and Procedure

1. Background

As a precursor to stating the procedure adopted by the St Lawrence Church, Lechlade, Parochial Church Council (PCC), it is appropriate to consider some background discussion that sets out the scope and obligations associated with live-streaming of services.

With developments of mobile 'phone technology it has become possible to live-stream services for the benefit of parishioners unable to attend church in person. In addition, offering the facility for, say, overseas people unable to attend funerals and weddings is now practicable. However, lockdown during the coronavirus pandemic not only accelerated the use of streaming but also enabled shared worship to continue thus providing worshippers with a degree of engagement with the church until gathering in church again was permitted and parishioners felt comfortable attending in person. Even after face-to-face services resumed, streaming remains part of the overall range of worship options at St Lawrence church but the key distinction is that members of our church community are now present while streaming takes place with consequential benefits and risks.

Recognising this development, the Chancellor of the Diocese of Gloucester has set an expectation that churches seeking a faculty for the installation of live streaming equipment shall have a live-streaming policy document and a privacy document to accompany petitions, and will impose conditions relating to them if a faculty is issued. The intentions of the Chancellor were originally set out in '*Guidance from the Chancellor for Petitioners Seeking a Faculty for the Installation of Live-Streaming Equipment*' dated 13th December 2021.

By extension, it makes sense for the PCC to have these arrangements in place when using a mobile 'phone and tripod set up for each service so that the spirit of the Chancellor's expectations is met; this will also stand the PCC in good stead should a permanent installation form part of the ICT provision within the scope of Project Inspire. However, there is other general streaming guidance from the CoFE that establishes the need for measures to be in place to accommodate safeguarding and privacy factors.

2. Benefits of streaming

The pandemic allowed the continuation of services and a form of communal worship; this was found to be of great benefit to many parishioners. Even after the resumption of face-to-face services benefit continued to be accrued by the housebound and those unable to attend for other reasons. Posting recordings on-line also enable catch-up at a later date. These benefits demonstrated the value of the concept of streaming should a lockdown recur.

3. Risks of streaming

Once filmed and published online, the footage or stills from the images are potentially available forever. Taking footage off-line at a future date does not mean that it will not have been captured by one means or another in the meantime and kept for future use and then propagated on social media. Whilst social media has enabled families and friends to keep in touch, especially during the pandemic, regrettably it has also spawned an array of people across the globe who seek to harm others. Those who run church services have a responsibility for the safety of their congregation. They should be alert to the fact that there are people who will deliberately try to cause harm to others through social media.

Parishioners worship in church as equals before God but some may be deterred from attending if their participation is broadcast. Likewise, there may be vulnerable people who enjoy the safety of the church congregation who would not wish their whereabouts to be broadcast.

Accordingly, any church introducing live-streaming must recognise that some members of the congregation will not want to be filmed. This wish must be respected. It cannot be right to turn every service into one where every person who attends risks being filmed regardless of whether they want to be filmed. A balance must be struck, so that either a person can fully participate in a service by sitting in a location that will not be captured and filmed, or the church will provide a range of services, some that are live-streamed and some that are not recorded.

4. Other considerations

4.1 Sensitivities surrounding worship – clearly elements of worship have varying degrees of meaning for Christians, the sharing of communion being particularly significant. Therefore, the PCC recognises the varying and personal sensitivities of individuals participating in forms of worship.

4.2 Performing rights – Christian Copyright Licensing International, states that *“music played during regular worship services (known as Acts of Worship) does not currently require licensing”*. The PCC has the appropriate licence.

4.3 Safeguarding – although most of the service shows just the faces of the clergy, choir and readers, at communion the faces of those sharing the body and blood of Christ may well be seen. Moreover, at St Lawrence we encourage the Sunday School groups to feedback to the congregation details of the activities in which they have participated while the adults have been in the service. Images of children are thus readily accessible via the streamed content of the later stages of a service.

4.4 Privacy/ data protection – this has become a growing area of regulation in recent years and the Chancellor has indicated that the PCC must identify the ‘lawful basis’ to make the recordings compliant with data protection law. The relevant lawful basis will likely be ‘legitimate interests’, which would allow the recordings to be made so long as the PCC can show that (a) there is a legitimate interest in doing so; (b) the recording is necessary in the sense that it is a proportionate way of achieving that legitimate interest; and (c) the interests and rights of the individual do not override the legitimate interests. This assessment must be set out in the procedure.

Policy

St Lawrence PCC undertakes to make reasonable endeavours to comply with the Church of England's guidance on live-streaming to take into account mandatory aspects as well as the sensitivities surrounding personal worship within the church community.

Specific local arrangements to achieve compliance consistently are set out in the following procedure.

These arrangements will be reviewed annually by the PCC or earlier in the event of any concerns being raised.

Procedure

1. Guidance from the Chancellor gives a strong steer on typical arrangements that must be taken into account by a PCC. In recognition of those obligations the position at St Lawrence is as under:

1.1 Position of the camera:

- a single camera (within a mobile 'phone) is located by the front pew on the centre north side opposite the pulpit;
- streaming commences no more than 5 minutes before the service starts by which time most people will be in their seats;
- the whole service will be streamed and the camera turned off within 2 minutes of the final blessing and the departure of the minister to the west door.

1.2 Camera use:

- the majority of the streaming will show the minister, those delivering the reading and Gospel, the person leading prayers and the preacher; throughout, in the background the choir will be visible;
- the PCC undertakes to inform these people that they will be visible on the streamed service;
- the PCC has determined that there are no parts of the service that will not be streamed; therefore, filming will not be stopped at any point other than the end of the service.

1.3 Availability of live-streamed material:

- as a general principle, streamed services will remain on-line for a period of one year;
- if only edited sections of a service, such as a sermon, are to be retained, these will be edited so that only the preacher will be shown plus any members of the choir who may be visible in the background.

1.4 Live streaming notice:

- the PCC has consulted with the congregation about participation in live streaming. This was initially undertaken in July 2022 and the outcome confirmed by the PCC on 20th July 2022;
- a statement setting out the position of the PCC shall be published on the church website;
- all publicity concerning any service where streaming will occur shall contain a reference to live-streaming; this will be achieved by having a blanket notice on the church website, inclusion on email circulars and a note added to service books and sheets as well as on any PowerPoint text/images projected on the screen;
- a clear notice setting out the position re live-streaming of a service will be displayed so that anyone entering the church may be made aware of local practice; this includes the implications of being filmed, broadcast on-line and being able to be viewed by anyone;
- attendees who wish to sit in an area where they will not be filmed must be directed by the Sidesmen to a suitable location;
- at the start of the service, it shall be announced that the service is being live-streamed and, where this is the case, that it will be recorded and available to download on-line.

1.5 Safeguarding:

- the Parish Safeguarding Officer has been involved in the drafting of this policy and procedure and shall be included in any review;
- specific arrangements to avoid filming of an 'at risk' child or vulnerable person are that leaders of children's activities will be aware of circumstances (provided that they have been advised by parents/carers) and will take necessary steps to avoid filming.

1.6 Special events:

- special occasions such as weddings, baptisms, funerals shall take into account the specific wishes of those participating before a decision is made on live-streaming. Wishes of those affected shall form part of the liaison ahead of a service.

1.7 The PCC's lawful basis for recording services:

- the PCC argues that there is a legitimate basis for recording specific services so that those unable to attend may share in worship within the St Lawrence community;
- recording nowadays is an easy task from a technological point of view and the vast majority of parishioners have access to some form of device to view the services in privacy at a time convenient to themselves;
- reasonable measures are in place to protect the privacy of individuals who may be present when recording takes place and, in the event of any concern being upheld, the PCC will remove the recording from the church website/social media channel.

1.8 Storage of recordings:

- any service will be held on the live streaming service provider's server for the duration of its availability on-line. Thereafter the recording will be removed.

1.9 Review:

- the PCC shall undertake and minute an annual review of this policy and procedure. The review shall include a genuine examination of compliance and any modifications that might be required in order to fulfil the objectives set out by the Chancellor.
- reference shall be made in the Annual Report of the PCC to review of this policy and procedure.

Approved by the St Lawrence, Lechlade Parochial Church Council 20th July 2022