

# **St. Paul's Church - Mill Hill**

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Charity no: 1139477



## **Filming and Photography Protocol in collaboration with GDPR Regulations**

Sharing services online is an exciting opportunity to reach out, however, it should be balanced with continuing to provide a safe and secure environment for all. Some members of our community may not feel comfortable appearing in video, and for others it may compromise their safety. Safeguarding, GDPR and creating safe places are all key factors before any recordings are made.

### **We aim to practise considerate filming/photography**

Many members of our community may have given their consent to appear as part of the congregation during filming, however, we must still be considerate to them as they worship together with others. Our camera operators will be sensitive to the congregations' needs and will try hard not to distract or interrupt the act of worship.

As a PCC, we will:

- Notify people in advance, with signage at entrances and/or on service sheets, that the service is being filmed, livestreamed and/or recorded.
- 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 may be included in filming or a part that is excluded
- State that streaming does not normally include images of the congregation, but of the ministers, leaders and anyone taking part in the service eg readers. Any images of the congregation will be distant or in passing. Images of people in close up, praying, or at the communion rail will 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, singing with a choir or children coming to show and tell what they have done in Children's Church or Sunday School.
- Only name people in broadcast intercessions or other notices 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):

- 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.

### **Consent (Adults and children over the age of 16)**

Those appearing in film or photography must give written consent, because attendance at a church service reveals religious belief, which is a special category data under GDPR.

This consent, which also constitutes a photo release consent, is agreed online by adults and is maintained via our Churchsuite Consent Request form. This covers photography in relation to Church events and any publication of images either within traditional or digital media.

A filming consent is also agreed online. Adults are advised to seek non-filming positions within the church if they wish not to be included on live streamed services. Elements of a service which involve movement around the Church e.g. the Eucharist will be filmed to respect the privacy of individuals within the context of worship.

Regular attendees at St Paul's Church only sign this consent once but it is refreshed and updated on a regular basis to ensure that respondents wishes are current. Those completing consent forms are made aware that should they wish not to be filmed, they may be seated in area assigned by either church wardens or sidespeople. Notices are also in position in the church to demarcate the area set aside for those not wishing to be filmed.

New visitors to our Church are made aware of this area before the service begins should they wish to avoid their images being filmed.

### **Consent (Children 16 years and under)**

Filming and photographic images containing children may be used by the church if consent has been given by their parent or guardian, following the same guidelines as above.

### **Consent can be withdrawn – Guidelines to be followed by the church in this event:**

There are any number of reasons why someone may choose to withdraw their consent, and it is not our role to discover why they would like to withdraw, but to make this as easy as possible, as this is their legal right.

- When someone withdraws their consent, videos or images of that person should be deleted everywhere they have been stored or published online and offline, if these images are of that individual only.
- If someone who later withdraws consent appears in a group video (i.e. as a member of the congregation), it is unlikely that the video can be edited. Many churches may find it easiest to remove the video completely, but the church may find it helpful to discuss this with the individual who has withdrawn their consent to see if an alternative solution can be found. However, if the individual insists on removal, the church should comply.

- It is more likely that a church would experience people not giving consent initially, than withdrawing it later, however it is wise to be prepared for this to happen, particularly where children are filmed because they may choose to have these images removed once they get older.

**Should someone wish to withdraw their consent they are asked to communicate this to one of the clergy, Churchwardens or Parish Administrator and the above guidelines will be implemented promptly. The Parish Administrator will then ensure that consent will be removed from our digitally stored consent agreement records.**