



Guidance re streaming a sacramental ceremony.

Following contact from several parishes in relation to live streaming of sacramental ceremonies, we received the following guidance from the Data Protection Officer for the Archdiocese.

It is necessary to obtain parent/guardian consent in order to stream a sacramental ceremony involving children. However, it is important that the consent is informed i.e. the parents/guardians must be given the identity of the platform that will be used for the streaming and any privacy implications of the streaming, for example, who can view the stream, if it can be shared/recorded etc.

It is obviously preferable if the children are not identifiable on the video stream. If they are not identifiable, then data protection rules do not apply. However, I am not sure to what extent this can be guaranteed, and I would not rely on this, so I would always advise that consent is obtained.

It is also preferable if a proper streaming service like TV Church Services or MCN is used. This is because there are more controls on those websites. For example, MCN have a function whereby you can password protect a streaming so that only those who have the password can watch it. This is obviously much better from a privacy perspective. If a ceremony is streamed on a Facebook page, it is more difficult to limit who views it and it may, in certain circumstances, be open to any member of the public. There are a number of different privacy settings which can be applied to a Facebook account. It can be set up so that (i) only "friends" of the Facebook account can view the stream; (ii) certain named individuals can see the stream; or (iii) all members of the public can see the stream. Obviously, it is better to limit this to as few people as possible can view the streaming but, at a minimum, only friends of the Facebook page should be permitted to view it. It is going to be difficult to guarantee this where it is the school's account.

In addition to this, it is difficult to limit what can subsequently happen to a streaming on Facebook i.e. who it can be shared with/forwarded to and whether those individuals can record it. The school should absolutely not keep a recording of the ceremony on Facebook. The video is saved as a default setting so the school will need to delete the recording. If a recording is required, this should be done by a professional videographer.

It is very difficult to advise as to the best angle to record from. This is whatever angle identifies the least amount of people, but this may change from church to church and may depend on what device the service is streamed on and where the person recording the ceremony is standing. Despite any measures that are put in place so that the images are not identifiable, it may be possible to zoom in to identify a particular child. A regular streaming service is usually set up so that only the first few pews are caught by the video. This way, individuals are given an opportunity to sit in another part of the church if they do not want their image streamed. The streaming by the school should be set up in a similar way, though of course, children partaking in the ceremony and those going to communion will still be caught by the camera. If a priest does not want his image recorded and broadcast on Facebook, this should be respected.

If the school is doing the streaming and it is on the school's Facebook page, the streaming is primarily a matter for the school and it is the school who should ensure that data protection laws are complied with. However, the public/congregation may not entirely appreciate this distinction, so if an issue were to arise, they may involve the parish. I would advise that the priest does remind people on the day that the ceremony is being streamed by the school.



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I have attached a consent form for parents/guardians. You will see from the attached, that there are a number of matters in square brackets/highlighted in yellow that the school will have to complete. I am happy to speak directly to any school if that would be beneficial for them as I am conscious that there is a lot of information in this email.

If you have any additional queries, please let me know.

*Kind regards
Michelle O'Riordan
Data Protection Officer*

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