



Data Protection Guidelines:

Taking Videos & Photos at Sacramental Ceremonies

Q: Are videos/photographs taken at a Confirmation or First Holy Communion ceremony subject to GDPR?

A: If it is possible to identify individuals from videos/photos taken at a sacramental ceremony, this means that the videos/photos contain “personal data” of the individuals in question and the videos/photos are subject to all the rules of GDPR. This is the case, even where the individuals’ names are not listed with the videos/photos. As these videos/photos contain images of children taking part in a religious event, this constitutes “sensitive personal data” and the parish must ensure that GDPR rules are followed.

Q: What practical steps can a parish take to ensure that the videos/photos it takes comply with GDPR?

A: Ensure that the children and other individuals in the videos/photos are not identifiable, for example:-

- ❖ the video/photo is taken from a distance so that it is not possible to identify who is in the video/photo;
- ❖ the video/photo shows only individuals’ backs and those individuals are not identifiable from the back;
- ❖ no names or other identifying information is published.

A: Obtain consent of those in the videos/photos. Where there are children in the video/photo, written consent of their parents/guardians must be obtained.

Q: How is consent obtained?

A: The consent of parents/guardians must be obtained in writing before taking

videos/photos of children at sacramental ceremonies. See form attached. An announcement should also be made at the ceremony reminding those present that videos/photographs are being taken by the parish.

Points to note:

- ❖ If a parent/guardian does not consent, no photo or video should be taken of his/her child
- ❖ Consent given by a parent/ guardian to the school to take videos/photos only allows the school to take the videos/photos - is not sufficient for the parish to rely on a school consent
- ❖ Children’s names should not be published with the video/photo, even where consent to the publication of the video/photo is obtained
- ❖ If the parish is engaging an external videographer/photographer, there must be a written data processor agreement in place between the parish and the videographer/photographer. Please contact the Diocese’s Data Protection Officer if you require this.

Q: What if the school is taking photo/videos at a ceremony?

A: If the school is taking photos/videos, it is up to the school to get consent. If the school engages the services of a videographer/photographer, again, it is up to the school to engage this person and put the correct written agreement in place. The parish cannot take copies of these videos/photos from the school for use on the parish's social media, without consent.

Q: What if other people take photos at the ceremony?

A: Videos/photos taken for personal use by parents/guardians are not subject to GDPR and, therefore, consent is not required. However, it is advisable to make an announcement at the ceremony asking parents/guardians and other family members to be mindful of others' wishes and not to publish photographs/videos on social media. Individuals other than:- (i) family members; (ii) an official videographer/photographer

engaged either by the school or the parish with appropriate agreement and consents in place; or (iii) school or parish personnel, again, with the appropriate consents in place, should not be permitted to take videos/photos. Any unauthorised individuals who are taking videos/photos at the ceremony should be asked to stop doing so and asked to leave the church.

Points to note:

- ❖ The parish should also contact the Diocesan safeguarding team to see if there are any safeguarding issues that need to be addressed
- ❖ If adults are in the videos/photographs, you will need consent from them also. Please contact the Data Protection Officer if you are unsure how to do this.

Q: How should videos/photos be stored?

A: Videos/photos should be taken with parish owned devices and not with personal devices. No videos/photos should be taken with personal devices.

A: Copies of videos/photos should be transferred from the device taking the video/photo and stored securely on an encrypted device for the retention period.

Q: How long should videos/photos be retained?

A: Videos/photos of sacramental ceremonies are generally taken to spread news of the ceremony in the parish. Therefore, there is no need to keep these videos/photos indefinitely and they should be deleted after 6 months. This also means removing them from the parish website/social media after this period. Any printed copies should be confidentially destroyed.

A: Where the videos/photos relate to a historical event, a small selection of images may be retained for historical purposes and placed securely in the parish archive.

If you have any questions about these Guidelines, please contact the Data Protection Officer at dpo@cashel-emly.ie

THIS IS A TEMPLATE ONLY
IT MAY NEED TO BE AMENDED
TO SUIT THE PARTICULAR CIRCUMSTANCES

Event Specific Consent Form

I understand that images of my child, including photographs, video images and streaming, may be taken at my child's First Holy Communion/Confirmation (delete as appropriate) to spread the news of the sacrament in the Parish, Pastoral Area and Diocese and to record the event for the future. By signing below, I consent to images of my child being taken in this way and to the publication of these images in any hard copy or online publication of the Diocese, Pastoral Area or Parish, including newsletters, websites, social media and streaming platforms.

By signing below, I consent to images of my child being used in this way.

Child's name (in block capitals): _____

Parent/Guardian name (in block capitals): _____

Parent/Guardian Signature: _____

Date: _____