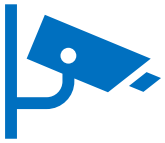

Data Protection Guidelines:

Webcams and Streaming of Ceremonies

Q: Is streaming of Mass and other ceremonies subject to GDPR?

A: In short, yes. Where images of identifiable individuals are streamed, those images are subject to GDPR.

Q: What can a parish do to ensure that streaming is compliant with GDPR?

- **A:** **Control what the webcam records:** Webcams should not stream continuously. Streaming should only be during specified Masses and, where appropriate, other liturgical services. The webcam should be turned off when the ceremony is over.[1]
  - The camera should capture the sanctuary only and generally should not stream images from the body of the church. It may be unavoidable that the first few pews of the church are captured by the webcam. At a minimum the following should be implemented:- (i) there should be an area of the church which is not filmed; (ii) images of the congregation should be wide angled making it harder to identify individuals; and (iii) notices should clearly indicate which seats which are subject to streaming.
  - It is imperative that it is possible to stop streaming during a ceremony. There should be a control panel on the altar to facilitate this.
  - **Signage and Notices**: Place clear signage at entrances, in the sacristy, in the parish newsletter and at other prominent places which advises:- (i) what ceremonies are streamed; (ii) that individuals' images may be broadcast on the internet; and (iii) where to sit to avoid being filmed.
  - **Consent**: Written consent to streaming should be obtained form Ministers of the Word or Eucharist, Altar Servers and others who regularly participate in Mass or other liturgies. Consent can be obtained when those individuals initially volunteer with a parish and should be renewed at regular intervals, e.g., every two years.
  - **Consent in writing should always be obtained before identifiable images of children or vulnerable adults are streamed**. This does not apply to children/vulnerable adults in the congregation but rather when they participate in Mass e.g. as altar servers and also when sacramental ceremonies

[1] Please contact your streaming provider who will be able to put automatic streaming in place at certain times of the day.

are broadcast which clearly identify children. Written consent should be obtained from the child's parents/guardians. If the child/ vulnerable person volunteers on an on-going basis, the consent is obtained when that person initially becomes involved in a parish e.g. altar server application form. Consents must be renewed regularly. It is also advisable to liaise with the parish safeguarding representative when images of children /vulnerable adults are being streamed to ensure compliance with safeguarding requirements.

- **Family Services:** You should always discuss the streaming of a funeral, wedding or baptism with the family before the service is streamed the family objects to the streaming, the ceremony should not be streamed.
- **Monitor numbers using service:** You should obtain regular updates of the number of people who view the streamed services. If the numbers are low, it may be appropriate to reconsider the streaming service.
- **Recordings**: Regular Mass should only be live streamed and should not be recorded. If individuals wish to stream and record a funeral, the recording should be password protected before it is put on the parish website. This is to ensure that only the family and whoever they share the password with, have access to it. The recording should be removed after a maximum of 30 days.
- Recordings should generally be deleted once they are removed from the website. However, a parish may retain a recording if it is historically important.
- If the recording is stored in the cloud, the cloud should be based in the EEA. Please discuss this with your IT provider.

Q: Are there any other considerations?

A: Data Processing Agreement: There must be a written agreement in place between the parish and the streaming operator.

A: Data Subject Access Request: If someone requests a copy of all information a parish holds about them, this includes images recorded and retained. Please contact dpo@cashel-emly.ie for further advice.

- **National Board:** See guidance of the National Board for further advice regarding safeguarding issues that may arise with streaming: www.safeguarding.ie/index.php/guidance

Further Queries

Please contact the Data Protection Officer at dpo@cashel-emly.ie if you have any queries or if you would like any help with notices or consent forms.