



Catholic Diocese of Sale

**DIOCESAN POLICY ON THE
USE OF SOCIAL MEDIA AND WEBSITES
FOR PARISHES AND DIOCESE**

April 2021

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Definitions

Adults at risk: This is the new term for ‘vulnerable adults’ which is recommended by the National Catholic Safeguarding Standards Version 2 as the focus is on risk factors rather than on the individual. These are adults with diverse circumstances and experiences that increase the risk of abuse which include being elderly, having a disability, having mental illness, having cognitive impairment, having diminished capacity, being culturally and linguistically diverse, experiencing transient risks such as bereavement or relationship breakdown or having an impairment that makes it difficult for that person to protect themselves from abuse or exploitation.

Child: a person who is under the age of 18 years. Throughout this document any reference to either ‘child’ or ‘children’ is a reference to a person or persons under the age of 18.

Church personnel: Clergy, Religious congregations, Diocesan and Parish employees, and Parish volunteers.

Cyberbullying: This is bullying behaviour using digital technology including mobile phones.

Online grooming: Online ‘grooming’ is where an adult sexual predator tries to lower a child’s inhibitions, or heightens their curiosity regarding sex, with the aim of eventually meeting them in person for the purposes of sexual activity. Online predators will focus on the vulnerable and will use all forms of digital technologies such as instant messaging programs, forums and chat rooms to gain trust.

Social media: websites and computer programs that allow people to communicate and share information on the Internet using a computer or mobile phone. These include blogs, podcasts, Facebook, Twitter, Instagram, YouTube and others.

Abbreviations

ACBC	Australian Catholic Bishops Conference
ACSL	Australian Catholic Safeguarding Limited
CDS	Catholic Diocese of Sale
CEOSale	Catholic Education Office Sale
CPSL	Catholic Professional Standards Limited (replaced by ACSL in 2021)
DOSCEL	Diocese of Sale Catholic Education Limited
NCSS	National Catholic Safeguarding Standards
WWCC	Working with Children Check

History of Updates to Policy

Draft Review Date	July 2020
Approval Date by Professional Standards Committee	16 July 2020
Inclusion of Audit tool; changes of CPSL to ACSL and ‘adults at risk’ instead of ‘vulnerable adults’ – approval by Bishop Greg	23 Apr 2021
Date of next major Review	July 2022

1. INTRODUCTION

Social media and websites provide an opportunity for the church to reach out to people online. They provide a conduit to foster 'community' for the Diocese and Parishes. This policy has been produced to address the evolving nature of social media, which has experienced exponential growth in recent years. This policy replaces the two separate policies on Social Media and Websites approved in December 2017.

The following three frameworks underpin this policy:

- Australian Catholic Bishops Conference (ACBC) 'Guide to Social Media for Parishes', released in May 2020 (referred to as the ACBC Guide)
- Australian Government's eSafety Commissioner's 'eSafety Guide'
- Catholic Professional Standards Limited (CPSL)¹ 'National Catholic Safeguarding Standards (NCSS)', released in September 2019.²

Although these frameworks are referenced, this policy seeks to provide specific direction to Parishes and Chancery within the Catholic Diocese of Sale (CDS) on the use of social media and websites. The policy seeks to positively enhance the online presence of the Church and ensure children and adults at risk are not harmed.

It may be amended, withdrawn, suspended or departed from at the discretion of the Bishop or Administrator at any time.

1.1 Definitions

Whilst the reader is familiar with what a website is, social media requires a definition. It is any type of online media that allows discussion and interaction as opposed to broadcast only. There are several types of social media which the Diocese and its Parishes use now or may use in the future and this policy covers all types, for example:

- Social networking (Facebook, LinkedIn, Google+).
- Microblogging (Twitter, Tumblr).
- Photo sharing (Instagram, Snapchat, Pinterest).
- Video sharing (YouTube, Facebook Live, Periscope, Vimeo).
- Private messages sent over online channels, such as direct messaging via Facebook, Twitter and WhatsApp.

¹ As of Jan 2021, CPSL has been replaced by ACSL who will take carriage of the NCSS

² Standard 8 focuses on safeguards to minimise risks to children in the online environment

1.2 Overarching principle

The use of social media and websites to spread the Church's message should occur in a positive manner to promote growth in faith and in communion with others. Accordingly, the overarching principle in all use of social media and websites should be that of human dignity. Care should be taken by staff members to ensure that the innate dignity of each person is upheld.

1.3 Scope

All Church personnel in the CDS must ensure that they are familiar with, and comply with the contents of, and support this policy and guidance. It applies to the following:

- Bishop, Priests, Deacons, religious brothers and sisters
- Diocesan employees
- Parish employees
- Parish volunteers such as youth leaders
- Contractors engaged by the CDS.

Exclusions - This policy does not cover:

- staff within the schools of the Diocese of Sale Catholic Education Limited (DOSCEL), the Catholic Education Office Sale (CEOSale) and Catholic Care because there are separate Social Media Policies which apply to these organisations.
- advice on choice of Content Management System, hosting or security for a Parish Website.
- advice on how or when it is appropriate to commence using a particular type of social media tool. These decisions need to be discerned by the Parish for their circumstance after gaining a firm understanding of the tool and its relevance to Parish communication.
- education of children about safe and respectful peer relationships using social media (as per Standard 2 of the NCSS). This is covered separately under a Protective Behaviours Program.
- guidelines for personnel on appropriate online communication with children including emails and social media. This is covered in the Code of Conduct.

2. RISKS

The following are some of the risks associated with the inappropriate use of social media and websites, which this policy aims to reduce:

2.1 Exposure to inappropriate content

Aimed at children, young people and adults at risk, this Policy seeks to reduce the risk of coming across inappropriate content.

2.2 Reputational damage

There could be an adverse impact on the reputation of the CDS. For example, the communication may not be in the style and language which is in line with the identity of the Parish or Diocese. In the social media space, even if personnel do not expressly name the Diocese or the Parish on social media, there may be a connection that can reasonably be made.

2.3 Risk that personnel's behaviour may be called into question

The nature of the online environment is rapidly evolving which creates risks for Church personnel where the line between what is public and private, personal and professional can become blurred. Church personnel may inadvertently place themselves in a situation where the appropriateness of their conduct is called into question.

2.4 Disclosure of confidential information and breach of privacy laws

Penalties apply to the misuse of confidential information and breaches of the Privacy Act (1988). Recent changes to the Privacy Act (1988) include specific rules proposed to protect the personal information of children and other vulnerable groups.

2.5 Posting of offensive, bullying, harassing, and discriminatory material

Cyberbullying can be particularly harmful as it is often a public form of humiliation and many others may be able to see what is written or posted. Once something is published online, it is difficult if not impossible to remove all traces of it.

2.6 Unwanted contact and online grooming

Children may make poor decisions about allowing people into their online lives, believing that those who are 'nice' online will be the same in the real world. Teenagers are particularly at risk because they are more likely to seek out and participate in online discussions about sexual activity. This risk can be reduced by both the recommendations in this Policy and a separate Protective Behaviours Program targeting children and young people.

3. GUIDING PRINCIPLES FOR SOCIAL MEDIA

The following are key guiding principles which underpin social media use.

Fundamentally, parishes need to first discern the appropriate social media tool to suit their needs. (See 4.1). In addition, parishes are encouraged to refer to the ACBC Guide 'Before you start' (p. 5) which outlines the importance of:

- Forming a social media team
- Deciding on the decision-making process
- Resolving to be conversational.

In addition, church personnel must recognise:

- that online behaviour should at all times demonstrate respect for the dignity of each person;
- the need to behave in an ethical manner when using social media (even for personal communication) as those communications can reflect on their role and must be consistent with the Catholic beliefs and professional expectations and standards;
- that when posting for the organisation that they are representing, the post should take on the style and language appropriate for the specific account;
- that social media channels in the Parish and Diocesan context are to focus on open public communication rather than private messaging.

4. GUIDELINES FOR SOCIAL MEDIA

4.1 Steps to be complied with in creating new social media accounts

1. Ensure that the selected social media tool fits the purpose for which it is required.

For example, a Parish is to use a Business page in Facebook rather than a 'personal' profile. Establish a Facebook Business Page to promote the Parish/Diocesan activities broadly first, then use a Facebook 'Group' for community discussion amongst your parish community.

2. Approval is to be obtained first from the Parish Priest and then the Diocesan Business Manager for the creation of official social media accounts.
3. An Agreement must be drawn up between the Parish Priest and Church personnel wanting to set up the social media service. The Agreement will outline:
 - a. named individuals who will be in the social media team;
 - b. the approver or the approval process for each 'post';
 - c. the access privileges to accounts and where the password is stored;
 - d. the commitment to:
 - managing content
 - moderation of comments
 - privacy and security
 - records management;
 - e. the acknowledgement that the direct messaging service is to be closed/not used.
However, in the case where the tool does not allow the direct messaging service to be closed but the case for using the social media channel is strong, then a minimum of two church personnel need to be nominated to monitor the messaging.
4. Prior to any interaction on the platform occurring, there needs to be endorsement by the Business Manager that the Agreement has been made with the Parish Priest.
5. Church personnel wanting to set up the social media service will be required to attend appropriate training before they can be authorised to manage official social media sites.

4.2 Access - Passwords and emails for social media accounts

The following must be adhered to:

- Passwords for official social media accounts must be securely stored. Passwords are to be changed when an administrator is replaced.
- At least two members of staff will need to have access to each account and password. One of these needs to be a paid employee or the parish priest.
- Social media accounts should be administered through corporate email accounts i.e. '@cdsale.org.au' or '@sale.catholic.org.au' accounts'. If this is not possible this must be noted and a case made when requesting to open the account to the Business Manager or Parish Priest.

4.3 Managing content

Church personnel must keep the following in mind when planning and posting content:

- Only publish content that is relevant to the Diocese/Parish you are representing.
- Ensure that all content is in line with the teaching of the Catholic Church.
- Post a variety of content including text, images and videos featuring good news stories as well as Parish event information.
- Before posting information in a Parish setting regarding Diocesan announcements/events, ensure it has been announced on the Diocesan Channels/Website first and where possible share from the Diocesan Channels.
- Be consistent with the frequency of posting. The recommended frequency is a minimum of three posts per fortnight per channel.
- Ensure that all photographs and video published have the relevant authority to publish from the subject and/or photographer (Note: written permission required from parents/guardians of minors). Permission forms can be downloaded from the Diocesan Safeguarding page and need to be managed by Parish personnel.

Compliance with Diocesan and Parish Code of Conduct

Church personnel must not post inappropriate material or make commentary that breaches the Code of Conduct (both the Diocese and their Parish).

Endorsements

Comments and posts from official Diocese of Sale Parish accounts must not endorse or make judgements about specific providers, products or services, and must avoid statements that advocate or criticise policies of government or political parties.

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The staff member posting material should consult the Diocesan Business Manager or Parish Priest if they need guidance on a particular matter and specifically if they plan to:

- post material that may be perceived as being made “on behalf” of the Parish for example. any specific commentary on a particular issue, and
- use the Parish’s logo, trademarks, official photographs or any other intellectual property of proprietary materials;
- post any material which may be considered to breach privacy or copyright obligations.

4.4 Moderation of comments

Church personnel who manage official social media sites must ensure the site contains clear moderation guidelines, and hide or remove any discriminatory, defamatory or offensive posts or comments as soon as possible.

4.5 Privacy and Security

Privacy must be protected. Content relating to parishioners may only be published if appropriate consent has been granted. Identifying details, such as phone numbers or home addresses are not to be shared.

It is recommended that Church personnel:

- ensure the privacy settings of their social media profiles are appropriately set to avoid putting their privacy at risk (for example, minimum recommendation for Facebook accounts: settings set to “only friends” and NOT “Friends of Friends” or “Networks and Friends” as these open your content to a large group of unknown people);
- recognise that even if they implement the maximum security settings for their social media profiles, the security settings on social media forums cannot guarantee that communications placed online do not become more publicly available than was intended (personnel should always assume that posts or communications online may become public).

Church personnel must understand that the type of security settings used cannot excuse breaches of this policy if the material posted is inappropriate and becomes more publicly available than was intended.

4.6 Records management

Church personnel who manage official social media sites are responsible for oversight of all social media posting and advertising. The Parish Priest is ultimately responsible for this as outlined in the Agreement. Any deleted posts and comments should be recorded. If a messaging service is being used, then screen shots need to be saved. If the volumes of messages on the messaging service are large, and it becomes unnecessarily burdensome, then Church personnel are encouraged to consult with the Diocesan Business Manager.

4.7 Using Social media with young people

The following guidelines are recommended:

1. Parishes who wish to promote youth activities through social media should carry this out on the Parish's main social media channels.
2. In the case where youth workers wish to have additional 'youth focussed' channels, then this need to be managed by two trained members of staff over the age of 18. These channels need to be approved for operation and work with the same protocols as other social media accounts. (See 4.1)
3. In particular, where young people are involved, it is important to have the capacity to moderate the comments.
4. Parish social media accounts (and not personal ones) can be used to broadcast updates with minors under the age of 18 and not to have ongoing conversations with minors.
5. With respect to Facebook Groups:
 - minors (children under 18) need to sign-up to join using a form with consent from their parents/guardians.
 - It is required that this should be set to 'closed' if there are minors involved. This is to prevent unwanted people being part of the group.

The risk to minors of being on social media sites such as Facebook Groups set to 'closed' is relatively low. Consent is also required from their parents / guardians. However, it is not feasible to safeguard minors who follow parish Instagram or Facebook pages as Church personnel are not able to 'police' activity on these platforms other than moderate comments.

4.8 Boundaries between Parish and personal use

It is recognised that Church personnel may use social media in their personal life. It is strongly recommended that there are separate social media accounts for Parish and personal use, where possible.³

With respect to the personal use of social media, church personnel must:

1. Not bring any Parish or the Diocese into disrepute or interfere with, or compromise their duties or responsibilities to the Parish or Diocese;
2. Comply with the Diocesan Safeguarding Policy and Code of Conduct as well as the Parish Code of Conduct. In particular:
 - the expected behaviours when posting personal comments that relate to, or can be identified as relating to, Diocesan or Parish issues (e.g. discussing or referencing the Parish priest or other individuals or children or anything related to, or reflecting upon a Parish).
 - making inappropriate contact with members of the parish communities. Church personnel over the age of 18 should not use social media to connect with minors (those under 18 years of age) using a personal account.⁴ The only exception is connections to minors to whom they are related and the connection is approved by the parent (For example when a Parish Priest is talking to his niece).
3. To be hyper vigilant to ensure that there is careful consideration as to what is being said on personal accounts about the Church. In particular:
 - not posting any material about the Parish on personal accounts (For example if a decision is made at the parish Council meeting and this decision is broadcast on a Church member's personal account before it is formally announced by the Parish Priest or respective authority).

4.9 Maintaining a record of current status

Parishes should keep a record or log of current status of all social media accounts as per the example given in the Audit tool in the Appendix.

³ This currently breaches the guidelines of Facebook that prefers not to have dual identities for the same person. This is not an issue with other social media accounts such as Instagram.

⁴ Parish social media accounts can be used to contact minors under the age of 18 provided the parents/ guardians are also included in the conversation.

5. GUIDING PRINCIPLES FOR WEBSITES

The following are key guiding principles that apply to websites:

Websites are now a standard communication tool for information and promotion of Church communities and their activities. A website in the Diocesan and Parish context is an online representation of the life of that community. It should therefore be dynamic; current and seek to present the church community in the spirit of the Gospel.

6. GUIDELINES FOR WEBSITES

These guidelines aim to ensure consistency and quality in communications for both the Diocese website and the websites of the individual Parishes. The Diocese provides a page for the basic details of each parish within the Diocesan website (see 6.6). However, Parishes wanting to establish their own websites need to provide the resources and funding for the establishment and maintenance of these websites. The costs are to be borne by Parishes alone. The Diocese cannot assist with the maintenance of Parish websites.

Similar to the considerations for setting up a social media account, parishes wanting to establish their own website need to undertake the following steps.

6.1 Steps to be complied with in creating Parish owned websites

1. Parishes need to be clear about the purpose of establishing a website. It is recommended that a **budget plan** is developed for the website **before** commencement. The following are to be considered in this plan:
 - Set up of the website, including: Costs of hosting, website design and content structure, graphic design, and quality content writing.
 - Maintenance of the website – from a technical perspective, including: on-going hosting costs, updates to the content management system, domain registration
2. Approval is to be obtained from the Parish Priest for the budget plan. The Diocesan Business Manager is to be notified.
3. The budget plan which has previously been approved (from a cost perspective) can now be expanded to provide more detail. In particular:
 - a. named individuals who will be responsible for content creation and maintenance;

- b. the approver for the content;
 - c. the access privileges to accounts and where the password is stored;
 - d. the commitment to:
 - managing content – both at creation but more importantly ongoing maintenance
 - moderation of comments
 - privacy and security
 - records management;
4. Prior to the commencement of the development of the website, the plan must be endorsed by the Parish Priest and Diocesan Business Manager.
5. The domain name is to be provided to the Diocesan Business Manager. In the case that the domain name changes or the website is closed down, the Diocesan Business Manager should be similarly advised.

6.2 Website Administrators

Website administrators appointed by the Diocese are the only staff members with permission to make changes to the Diocese of Sale website.

6.3 Content Development and Approvals

Content needs to be faith based, and must positively promote the parish and/or Diocese. It must be kept current. Any updates, additions or changes to website content must adhere to the organisational style, and be approved by the appointed 'approver' prior to publication.

Maintenance of the website from a content perspective is important. There needs to be processes in place to check the content regularly, such as a website content calendar.

6.4 Privacy

Confidential information should not be uploaded to the Diocese's website. Content relating to activities and staff, such as news items and images, may only be published if appropriate consent has been granted.

6.5 Online forums

Having online forums on a Parish or Diocesan website is not recommended unless the forum can be moderated appropriately with pre –publication checks/moderation (it does not appear live until the moderator approves the content). The responsibility for moderation is that of the parish.

6.6 Parish pages on the Diocesan website

There will be a webpage for each parish. It is the responsibility of the parish to inform the Diocese of changes to the content when required. The Diocese undertakes to update the content as soon as is practicable. A guide regarding this process will be made available to parishes.

6.7 Parish Websites

Parishes need to ensure their websites are current and well–maintained. Parishes need to ensure the website content management system and the content itself are maintained, kept current and relevant.

The individuals who will act as administrators of the site need to be named in the website plan. At least two parish staff should act as administrators for the site and, where necessary, volunteers can assist with the upkeep of the website under the direction of the Parish Priest.

If opting to upload photos or videos or live streaming to the website, written permission for minors' images must be sought.

6.8 Maintaining a record of current status

Parishes should keep a record or log of current status of website responsibilities, settings and maintenance as per the example given in the Audit tool in the Appendix.

7. CONCLUSION

The use of electronic communication tools such as social media and websites are continuing to evolve. Social media activities may be visible to current, past or prospective Church personnel which includes parishioners, their children and grandchildren going into the future. This Policy addresses the risks anticipated by these activities and the Catholic Diocese of Sale will continue to monitor these developments in line with advice from frameworks published by authorities such as the ACBC, eSafety Commissioner and the ACSL.

7.1 References

ACBC, Guide to Social Media for Parishes, Australian Catholic Media Council, May 2020.

CPSL⁵, National Catholic Safeguarding Standards, Edition One 2019.

eSafety Guide, eSafety Commissioner, Accessible at <https://www.esafety.gov.au/>. References accessed in June 2020.

⁵ Published initially by CPSL but from Jan 2021 the carriage of the National Catholic Safeguarding Standards has been assumed by ACSL.

8. APPENDIX – Audit Tool for Parishes

Parishes should keep a record or log of current status of all their social media accounts as well as website logins (and other maintenance) as per the completed example below.

8.1 Social Media and Website Audit/Record Keeping tool (example)

Account Name/Website and purpose	Type and purpose	Responsible person and role	Settings and service standards	Contact Details and email linked for the social media	Last audited	Additional notes from audit
www.SunnyParish.org.au	Main Website	Fr Bob Smith - Administrator Mary Cross – Parish Secretary Administrator	Web support company: Crunchco Contact: Ann Smith 04073068467 Yearly subscription Hosted in Australia	sunnyparish@bigpond.com	9/3/2021	
www.facebook.com/Sunnyparish	Facebook Page Main Facebook presence for the Parish to promote parish activity	Fr Bob Smith - Administrator Mary Cross – Parish Secretary Administrator Doug Valent - Editor	Personal Message service closed	Email address listed sunnyparish@bigpond.com	9/3/2021	
www.facebook.com/Sunnyyouth	Facebook Page Page to support Youth Activities	Geoff Brown -youth Worker	Personal message service open Questions are answered by geoff within 24 hours Facebook page is linked to Instagram for duplicating posts	Sunnyyouthbigpond.com Geoff uses a different Facebook just for work to manage this account	9/3/2021	Another staff member should also be added to this admin team if not regular oversight required

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www.facebook.com Sunny Parish mums	Facebook group Communication group for playgroup and other family activities	Mary Cross-Administrator Sally Field Karen Smith	Closed group with entry through answering questions Admins approve posts before published	Mary Cross Sally Field -parish family worker Karen Smith -playgroup volunteer		
www.facebook.com/sunnykitchen	Facebook page Promotion of charity kitchen	Mary Cross-Administrator Sue Green - Sunny Kitchen volunteer coordinator	Facebook for fortnightly roast dinner Message service open to take enquiries	sunnykitchen@bigpond.com	9/3/2021	Second administrator needed for this page * Action at staff meeting
www.instagram.com/sunnyparish	Instagram To share image of life in Sunny Parish	Fr Bob Smith - Administrator Mary Cross – Parish Secretary Administrator	Direct Messaging not used	sunnyparish@bigpond.com	9/3/2021	
Sunny Parish YouTube	YouTube To stream mass and post information videos	Fr Bob Smith - Administrator Bob Jones – Volunteer tech	Used for streaming of Mass once a week Masses removed after two weeks	sunnyparish@bigpond.com	9/3/2021	