DIOCESE OF ALLENTOWN

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SOCIAL MEDIA AND ELECTRONIC COMMUNICATIONS POLICIES

EFFECTIVE 1 November 2022

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Dear Brothers and Sisters,

Since the time of Christ, the Church has used the means of modern communication to spread the Gospel of Jesus Christ and fulfill its mission to "preach the Gospel to every creature" (Mk 16:15). Beginning with the spoken word, through the printing press and up to the current age, the Church has fulfilled this mission. In the twenty-first century, the Church again is using the means of modern communication to fulfill the ministry of evangelization.

Holy Mother Church also calls us to be prudent and respectful to all so that we can be effective disciples of Jesus Christ. To this end, the Diocese of Allentown is adopting these new guidelines to form our conscience and guide our actions in making informed and reasonable decisions regarding our use of social media and modern technology. It is my hope that we use these guidelines to continue our protection of those most vulnerable around us, including minors and those who are unable to protect themselves.

As we continue in the twenty-first century, I pray that we all may find the words of Jesus Christ in the Gospel encouraging and a source of comfort. I hope as well that each of us hears the challenge to follow the example of Christ in our lives.

I am grateful to the members of the laity and clergy who have assisted in developing and implementing these policies. In order to emphasize the importance of these policies, "I declare that"

The "Social Media and Electronic Communications Policies" have the force of Diocesan particular law and are binding on the entire Diocese of Allentown.

Sincerely yours in Christ,

+Alfred A. Schlert

✠ Most Reverend Alfred A. Schlert
Bishop of Allentown

Social Media and Electronic Communications Policies
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Attachments:

I. SCOPE

What and Whom do the Policies Cover?

These policies govern the use of social media and Electronic Communications by all Church Representatives (as defined in Section II), including those in the Diocese's parishes, schools, and ministries (Attachment 1).

Any person who creates or administers a website or social media account in his or her role as a Church Representative is also governed by these policies (Attachment 2).

How do the social media and Electronic Communications Policies Work with Other Diocesan Requirements?

These policies are intended to complement – not supersede-existing Diocesan policies. These policies do not supersede applicable laws governing social media and electronic communications. As such, Church Representatives must comply with all applicable federal, state, and local laws and avoid any and all behavior that could result in criminal or civil liability for the Church Representative or the Diocese.

Church Representatives are reminded that they must comply with all Diocesan policies and requirements applicable to their role(s), including, but not limited to the following:

Child Protection and Safe Environment Policies;
Policies and Procedures Regarding Alleged Sexual Abuse;
Employee Handbook;
Information Technology Security Policy;
Confidentiality and Nondisclosure Agreement;
Code of Conduct;
Policies for Catholic Schools; and
School Employee Technology and Internet Usage Agreement

What are Expectations for Compliance?

The Diocese expects full compliance with these policies by all Church representatives. Violations may result in disciplinary action, up to and including termination of employment or removal from ministry or other service.

II. Definitions

For purposes of these policies and attachments, the following definitions apply:

Church:

"Church" shall include the Diocese of Allentown and all entities of the Diocese of Allentown, including, but not limited to parishes, schools, ministries, and related entities.

Church Representative:

A "Church Representative" shall include any person 18 years of age or older[1] who falls within one or more of the following categories:

Clergy (all Bishops, priests, deacons);

Religious (all women and men in consecrated life);

Employees of the Diocese of Allentown or its parishes, schools, ministries, or related entities;

Volunteers of the Diocese of Allentown or its parishes, schools, ministries, or related entities;

Aspirants to the Permanent Diaconate;

Seminarians studying for the Diocese of Allentown or other seminarians from religious communities assigned to ministries in the Diocese of Allentown.

[1] Persons 18 years old and still enrolled in high school while participating in Church activities under the supervision of another Church Representative, are exempt from these policies. Nevertheless, such students are still expected to comply with all laws and use the highest level of discretion. They will be bound by these and other applicable Diocesan policies upon the earlier of (a) 60 days after graduation from (or non-enrollment in) high school; or (b) turning 19 years old.

Electronic Communications:

"Electronic Communications" shall include, but not be limited to, email, texting, instant messaging (IM), direct messaging (DM), online videos, video chatting, group messaging, blogging/microblogging, online posts, file transfers, and other interactive communications.

Minor:

"Minor" shall include any person under the age of 18 years of age.

Social Media:

"Social Media" shall mean any form of web-based, network, or mobile-based technology, application (app), or tool for sharing content or participating in interactive communications or social networking.

Vulnerable Adult:

"Vulnerable Adult" shall mean any person at least 18 years old who, because of impairment of physical or mental function or emotional status, cannot adequately provide for his/her own daily needs or is otherwise unable or unlikely to resist or report sexual abuse, physical abuse, neglect, or exploitation without assistance.

III. General Policies

A. The following General Policies apply to Church Representatives when using social media or Electronic Communications for either Church or personal purposes.

1) **Church Teachings** – Due to the nature and mission of the Catholic Church, all employees are bound to exhibit respect for the teachings and discipline of the Church regarding matters of faith and morals.

2) **Prudence and Respect for Others** – Be prudent, transparent, and use good judgment. Be respectful and treat others with dignity. Do not defame others. Avoid scandalous material, inappropriate language, harassment, threats, and any unprofessional or offensive content or statements.

3) **Official Church Position** – Do not claim to represent the official position of the Church unless authorized to do so. Clergy in good standing and employees of the Office of Communications in the Diocese of Allentown are examples of who is authorized.

4) **Electronic Communication with Minors** – Obtain written permission from parents/guardians before communicating electronically with minors. This includes text messages, phone calls, posts, instant messaging through social media, and all other forms of electronic communication. Church Representatives shall not request or accept personal contact information from minors without written parental/guardian consent. If in doubt, contact the Secretary for Catholic Health and Human Services & Youth Protection for Guidance.

5) **Posts Involving Minors** – Obtain written permission from parents/guardians before posting photos, videos, or personally identifiable information of minors. For photos or videos of large groups or from large, public events (where privacy would not be expected), permission

may not be necessary, but discretion should always be used before posting photos or videos of others. If in doubt, contact the Secretary for Catholic Health and Human Services & Youth Protections for further guidance.

6) **Protecting Confidential Information of Others** – Do not share confidential, health, or personally identifiable information without permission. Be aware of and abide by applicable laws regarding confidentiality, including the Health Insurance Portability and Accountability Act (HIPAA).

7) **Other Confidentiality Obligations** – Be mindful of any confidentiality obligations relating to your ministry, service, or employment with the Church. Do not disclose confidential information of a minor, including personal contact information, without the written permission from the parent/guardian.

8) **Applicable Laws** – Abide by all applicable laws. Be especially mindful of copyright and trademark laws. Do not use others' photos, videos, content, or audio, or use links with their protected content without their approval. (This includes photos and images found via websites).

9) **Disappearing Content Without a Record** – Avoid using features of social media or electronic communications that automatically delete content or cause content to disappear without a record (e.g., Snapchat or other apps).

10) **Transmitting Sensitive Information** – Do not transmit sensitive personal or financial information through unprotected email, web pages that convert form data into email, or web forms using regular hypertext transmission (http:// pages). Avoid transmitting sensitive information over SSL (https://) unless the communication through the server can be verified through third-party services.

11) **Creating and Administering Websites and Accounts** – Anyone who creates or administers a website or social media account in their role as a Church Representative and on behalf of the Church must, in addition to following these General Policies, sign and abide by requirements of the attached Policies for Creating and Administering Church Websites and Social Media Accounts (Attachment 2).

12) **Political Posts** – Be careful to refrain from partisan politics on social media. In accordance with Canon Law and the identity of the Church, clergy should not explicitly endorse political candidates or political parties. Lay employees and volunteers posting on behalf of the Church should also refrain from political endorsements.

B. **Best Practices**

1) Remember that **no social media or electronic communication is truly private.**

2) Keep personal social media account sites separate from account sites for Church ministry, service, or employment.

3) Obtain pastor or supervisor written permission prior to using personal social media accounts for Church ministry, service, or employment.

4) When using social media or the internet for Church or personal purposes, be aware of how your online presence may be viewed in light of your role with the Church (e.g., clergy, religious, employee, volunteer, etc.).

5) Employees of the Church must be mindful of related employment policies.

6) Church Representatives who violate these policies may be subject to disciplinary action, up to and including, termination or dismissal. Disciplinary action may take various forms – from a verbal reproach/counseling to termination of employment or removal from ministry/service.

IV POLICIES FOR COMMUNICATIONS WITH MINORS AND VULNERABLE ADULTS

Communicating online with minors or vulnerable adults requires special consideration. These Policies aim to achieve an appropriate balance between pastoral effectiveness and safety. Maintaining this balance – guided by values of prudence, reasonableness, and transparency – should continue to be the goal as the Church adopts new technologies to communicate with and evangelize minors and vulnerable adults.

Church representatives using social media or electronic communications with minors or vulnerable adults for the purpose of their ministry, service, or employment with the Church should comply with the above General Policies and also the below Policies for Communications with Minors and Vulnerable Adults. Church Representatives must also be in compliance with all applicable Diocesan Child Protection and Safe Environment Policies.

A. **Administrative Access**

1) Two adult employees (including the pastor/principal/administrator) compliant with the Diocese's child protection policies must have full administrative access to all social media accounts to be used with minors or vulnerable adults.

2) These two administrators must sign and abide by the attached Acknowledgements (Attachments 1 and 2).

3) No minor may be given administrative control over account settings with respect to Church-related social media accounts.

4) For parishes or ministries that have only one employee, the second adult may be a volunteer who is compliant with the Diocese's child protection policies and who has agreed to and signed the attached Acknowledgments (Attachments 1 and 2).

B. **Time frames**

1) Set clear and appropriate timeframes for social media and electronic communications involving minors and vulnerable adults.

2) Absent an emergency or necessity (e.g., due to the timing of an event), such communications should occur only between the hours of 7AM and 9PM.

C. **Parent/Guardian Notification**

1) Parents/guardians must be informed in writing of the communications (social media and/or electronic communications) to be used with minors or vulnerable adults.

2) When feasible, the minor/vulnerable adult or the parent/guardian should have the ability to opt out and receive the communications via another method.

D. **Accessibility**

1) Social media and electronic communications with minors or vulnerable adults must include or be accessible by:

   a. the parents/guardians; or

   b. at least two adult Church Representatives compliant with the Diocese's Safe Environment requirements.

E. **Inappropriate Communications**

1) Avoid any communication that might be construed as having inappropriate sexual, romantic, or overly familiar or intimate overtones.

2) Do not reply to any such communication from a minor or vulnerable adult.

3) Promptly notify your pastor/principal/administrator and keep a copy of the communication to provide to him/her.

F. **Content Review**

1) When using Internet resources with minors or vulnerable adults present, Church Representatives must ensure all viewable content is appropriate.

2) This includes taking steps to avoid inappropriate ads, images, or videos from appearing.

3) Review all content in advance.

4) Employees and volunteers of Diocesan schools should also consult any applicable guidance from the Secretariat for Education, Evangelization, and Formation.

G. **Best Practices**

1) Social Media and Electronic Communications involving Minors or Vulnerable Adults should be used only for appropriate outreach, ministry, and education.

2) Pay special attention to monitoring content when Minors (especially teens) or Vulnerable Adults are participating in social media or Electronic Communications. Be vigilant for pleas for help from Minors/Vulnerable Adults and take all reasonable steps to ensure prompt and appropriate responses.

3) Maintain professionalism and appropriate boundaries at all times. Write as though others will read what you wrote and see what you posted.

4) When possible, save copies of Electronic Communications and Social Media posts with Minors/Vulnerable Adults, especially those involving issues personal to the Minor/Vulnerable Adult.

5) Recognize the difference between initiating friend requests with Minors/Vulnerable Adults and accepting them. Adults should never initiate friend requests with Minors/Vulnerable Adults. Accepting friend requests from a Minor/Vulnerable Adult should be carefully considered and must be approved by the parent/guardian of the Minor/Vulnerable Adult prior to any communication.

6) Use common sense and good judgment. There may be times when a life- threatening or safety emergency requires immediate action that cannot reasonably allow strict compliance with all technical aspects of these Policies. Life and safety concerns should be appropriately addressed while making all reasonable attempts to comply with these Policies.

Pastors/supervisors should be promptly informed of any emergency situations.

7) Online gaming often involves social networking. Those who minister to or work in pastoral settings with Minors/Vulnerable Adults should take care in their involvement in online gaming and protect their online game identities so appropriate boundaries are maintained.

V. POLICIES FOR CREATING AND ADMINISTERING CHURCH WEBSITES AND SOCIAL MEDIA ACCOUNTS

Any Church Representative creating or administering a website or Social Media account on behalf of the Diocese or any of its parishes, schools, or ministries, must comply with the following Specific Policies as well as the Diocese's General Policies governing Social Media and Electronic Communications.

A. **Pastor/Supervisor Approval** - Obtain written approval of your Pastor or Supervisor before establishing a website or social media account for Church-related purposes.

B. **Administrative Access**

1) Ensure that at least two adult employees, (including the pastor/department head/canonical administrator) have full administrative access to all Church-related websites and Social Media accounts at all times.

2) Never give a minor or unauthorized person administrative control over account settings for Church-related websites or Social Media accounts.

3) For parishes or ministries that have only one employee a second adult may be a volunteer who is compliant with the Diocese of Allentown's child protection policies, and who has agreed to and signed the attached Acknowledgments (cf. Attachments 1 and 2).

C. **Content Monitoring**

Administrators must register to get email alerts of activity and monitor content on a regular basis, promptly reporting any problematic material to the appropriate pastor/supervisor/department head/canonical administrator and the Diocese's Executive Director of Human Resources and Information Technology.

D. **Privacy and Restrictions**

1) Be familiar with the terms of use, age restrictions, and privacy options and controls for each website and social media account.

2) Limit who may post on public sites and pages and who may access non-public sites and pages (e.g., a Facebook page set up for a parish ministry would generally be limited to those actively involved in the ministry).

E. **Ownership**

1) Church-related websites and social media accounts shall be owned by the Church or the parish, school, or ministry for which the website or social media account was created and used.

2) No individual shall have ownership rights in any Church-related website or social media account, regardless of the name or contact information under which the site or account is registered.

F. **Handling Hacks**

1) Have a plan of what to do if a Church-related website or social media account is hacked.

2) Report the situation to the appropriate pastor/supervisor/department head/canonical administrator, as well as the Diocese of Allentown's Executive Director of Human Resources and Information Technology.

3) Suspend public view of the site/account until the issue is resolved to avoid additional problems.

4) Web Forms & Sensitive Information - When creating and managing web forms that capture sensitive information (e.g., registration forms), be sure to use a qualified web-solution provider or person who understands the demands of secure transmissions and can ensure that the website can appropriately handle such security. If in doubt, contact the Diocese's Executive Director of Human Resources and Information Technology.

G. **COPPA**

1) COPPA is federal legislation that imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age.

2) Be aware of, and ensure, all website and social media account administrators understand the Children's Online Privacy Protection Act (COPPA).

H. **Best Practices**

1) Use Church-related websites and social media accounts only for appropriate outreach, ministry and education.
2) Remove inappropriate posts and comments promptly from Church-related websites and social media accounts. Use good judgment in determining what content remains on a Church- related site/account. Consider posting rules of conduct such as those used by USCCB.

3) All posts and comments should be marked by Christian charity and respect for the truth. They should be on-topic and presume the good will of other posters. Discussion should take place primarily from a faith perspective.

4) Consider using a "no-tagging" option on accounts. Alternatively, avoid using full names in captions. Use first names only (e.g., John 5.) or no names.

5) Minors/Vulnerable Adults should not be tagged without parent/guardian permission.

6) When using Internet resources with audio for a group or audience, try to have closed captioning available for those who might require it.

We thank you for your service to the Church and for helping the Diocese of Allentown share the Gospel message of Jesus Christ prudently, faithfully, and joyfully.