



CATHOLIC ARCHDIOCESE  
OF MELBOURNE

**“Communication has the power to build bridges, to enable encounter and inclusion, and thus to enrich society. How beautiful it is when people select their words and actions with care, in the effort to avoid misunderstandings, to heal wounded memories and to build peace and harmony. Words can build bridges between individuals and within families, social groups and peoples. This is possible both in the material world and the digital world.” Pope Francis**

## DIGITAL COMMUNICATIONS POLICY

### POLICY ADMINISTRATION SCHEDULE

<b>Policy Owner</b>	Executive Director Stewardship
<b>Who the Policy applies to</b>	All employees, contractors and volunteers of the Catholic Archdiocese of Melbourne (excluding staff of Catholic Education Melbourne, Catholic Development Fund, CatholicCare, Villa Maria Catholic Homes and Schools of the Archdiocese that are subject to an existing and comparable policy).
<b>Approval authority</b>	Executive Director Stewardship
<b>Inaugural Approval Date</b>	January 2020
<b>Next Review date by Policy Owner</b>	January 2022
<b>Related documents and Policies</b>	<ul style="list-style-type: none"> <li>• Safeguarding Children and Young People Policy</li> <li>• Victorian Child Safe Standards</li> <li>• National Principles for Child Safe Organisations</li> <li>• National Catholic Safeguarding Standards</li> <li>• Code of Conduct 2015</li> <li>• Conditions of Employment for Diocesan Employees 2011</li> <li>• Integrity in Ministry</li> <li>• Integrity in the Service of the Church</li> <li>• Workplace Bullying Policy</li> <li>• Sexual Harassment Policy</li> <li>• Privacy Policy</li> <li>• Working with Children Check Protocol</li> </ul>

## **1. PURPOSE AND SCOPE**

The Catholic Archdiocese of Melbourne supports the use of digital communications as a powerful tool for communication and engagement, providing an opportunity to connect with parishes, organisations and individuals to enhance the mission of Catholic Archdiocese of Melbourne in promoting the Good News.

This Digital Communications Policy focuses on best practice engagement via organisational email communication and through social media sites, by personnel within Catholic Archdiocese of Melbourne.

This Policy also provides guidance for personnel within Catholic Archdiocese of Melbourne in relation to personal digital communications activity.

This Digital Communications Policy applies to Staff, Employees, Contactors and Volunteers within Catholic Archdiocese of Melbourne and replaces an earlier version dated 13 April 2015.

## **2. DEFINITIONS:**

<p><b>What is Digital communications?</b></p>	<p>Social Media is the collective of online/digital communication channels dedicated to community-based input, interaction, content-sharing and collaboration.</p> <p>Platforms include among many: Facebook, Twitter, LinkedIn, Instagram, YouTube, Texts and Email.</p> <p>This Policy applies irrespective of whether such platforms:</p> <ul style="list-style-type: none"> <li>• are accessed by computer, mobile phone or other device; or</li> <li>• enable written messages, sharing of photos/videos or voice messaging.</li> </ul>
<p><b>To whom does this policy apply?</b></p>	<p>All 'personnel' working or contributing in a diocesan agency, department and authorised body of Catholic Archdiocese of Melbourne, including:</p> <ul style="list-style-type: none"> <li>• employees – full-time, part-time or casual;</li> <li>• contractors or consultants representing Catholic Archdiocese of Melbourne or working within it.</li> </ul> <p>The Policy does <i>not</i> apply to:</p> <ul style="list-style-type: none"> <li>• priests, deacons, seminarians, brothers and sisters pursuing their vocation within Catholic Archdiocese of Melbourne;</li> <li>• volunteers in parishes and Church organisations; and</li> <li>• staff of Catholic Education Melbourne, Catholic Development Fund, CatholicCare, Villa Maria Catholic Homes and Schools of the Archdiocese that are subject to an existing and comparable policy concerning digital communications.</li> </ul>
<p><b>What communications does this policy cover?</b></p>	<p>This policy covers digital communications, including email and postings on social media, related to work and/or ministry, and all digital communications to which children and young people are likely to have access.</p> <p>Catholic Archdiocese of Melbourne personnel utilise email communication and social media for a multiplicity of good reasons to undertake their work and/or ministry.</p> <p>Major examples include:</p> <ul style="list-style-type: none"> <li>• Official correspondence or communications with parishes, Catholic agencies and groups, government regulatory authorities, other dioceses.</li> <li>• Implementation of policies and procedures of Catholic Archdiocese of Melbourne in activities such as safeguarding, finance, property and human services.</li> <li>• Guidance, direction and conversation on services, celebrations and events that express the mission and purpose of the Catholic Church in Melbourne</li> <li>• Other posts on Social Media or content of communications not otherwise specified.</li> </ul>

## **3. DIGITAL COMMUNICATIONS AND CHURCH MISSION**

Catholic Archdiocese of Melbourne recognises that the development of digital communications has provided significant opportunities for evangelisation and spreading of the Church's message, allowing personnel to evangelise the Catholic faith, communicate, share information, build professional relationships and promote Church and Catholic Archdiocese of Melbourne activities.

Catholic Archdiocese of Melbourne understands that the use of digital communications to spread the Church's message should only be undertaken to the extent that it promotes a growth in faith and in communion with others. Accordingly, the overarching principle in all uses of Social Media should be that of human dignity.

The use of digital communications by personnel of Catholic Archdiocese of Melbourne, particularly those identified as representing Catholic Archdiocese of Melbourne, should always demonstrate a Christ-centred love for others and a respect for human dignity.

## **4. POLICY**

### **4.1 General guidelines for the use of Catholic Archdiocese of Melbourne digital communications platforms**

Catholic Archdiocese of Melbourne is committed to safe and responsible use of Catholic Archdiocese of Melbourne's digital communications platforms.

The following "Pastoral and Community Rules" govern engagement on Catholic Archdiocese of Melbourne digital communications platforms utilised within the Archdiocese including parishes.

#### **PASTORAL AND COMMUNITY RULES**

We encourage thoughtful and respectful communication, and ask that you follow these guidelines in relation to digital communications communication:

- Please do not reveal any personal or private information (e.g. age, health status, phone number, email address) for anyone without permission and even then for a sound reason connected with the work of the Catholic Archdiocese of Melbourne.
- Take particular care not to reveal private information or identifying details/photos/videos about children, young people or vulnerable adults. When posting photographs or videos, you must gain permission from those who appear in them, before posting or tagging any photographs or videos. Do not post such photos if the person denies permission to use their image, as there may be legal implications for you and the organisation you represent.
- Never describe individuals by characteristics such as race, cultural heritage, disability, gender or sexual orientation unless there is professional context underpinning the description.
- Please keep your comments respectful - no abusive, bullying, offensive, discriminatory, threatening or defamatory posts.
- Please do not make comments that encourage others, especially children/young people, to engage in activities that are unsafe or illegal.
- Keep it relevant. No spamming or advertising please.
- Be careful about receiving or forwarding videos, images, jokes or other similar material. Such material is not permissible if is pornographic, involves unfair racial, gender or religious profiling, or is otherwise offensive.
- No posting of false, deceptive or misleading content that is in violation of copyright or any law or regulation.
- When speaking about content related to activities or services of Catholic Archdiocese of Melbourne, a voice must be clearly identified, or issued in the 'first person' with a disclaimer to make it clear that the views expressed are as individuals and do not necessarily reflect or represent the views of the Archbishop or Catholic Archdiocese of Melbourne.
- Please comply with the platform terms of use e.g. Facebook, Instagram, Twitter.
- When endorsing Archdiocesan services and activities, you must disclose your relationship with Catholic Archdiocese of Melbourne (for example employee, volunteer etc.) and ensure that endorsements do not contain representations that are deceptive or cannot be substantiated.
- Compliance with relevant legislation including Copyright, Privacy and Anti-discrimination legislation is mandatory.

## 4.2 Digital communications with children and young people

While it is recognised that the utilisation of digital communications has become an effective ministry tool with children and young people in ministry programs, the Catholic Archdiocese of Melbourne is committed to the protection of children and young people from all forms of abuse including abuse through the use of digital communications.

All personnel have a responsibility when communicating with children and young people to recognise there are a range of strategies that can be utilised to ensure safe and respectful communication via email or social media consistent with the expectations set out in the Catholic Archdiocese of Melbourne Safeguarding Children and Young People Framework.

The following guidelines govern engagement with children and young people:

- Only employees and volunteers who have undergone appropriate screening e.g. Working with Children Check may communicate via email or social media with children and young people on behalf of Catholic Archdiocese of Melbourne
- Before any digital communication, including text messaging, may take place as part of ministry with youth participants older than 13, parents must be informed of the intention of the communication within the context of a program, activity or event and must first grant permission in writing for the child or young person to participate.
- There should be no direct digital communication with children 13 or younger from Catholic Archdiocese of Melbourne personnel in Church-sponsored groups or activities or from adults ministering to them, teaching them or coordinating the program or activity.
- Catholic Archdiocese of Melbourne Personnel must acquire contact information, including a phone number, for the parent or legal guardian of any minor with whom there is digital communication.
- Acceptable hours for communicating with youth via Social Media sites or text message should only be between 8.00 a.m. and 9.00 p.m. Communication outside of these hours may be undertaken, however, in emergency circumstances or if necessary concerning something which is time-sensitive to the ministry or an event.
- It is not permitted for an adult to initiate an online conversation with a minor (under age 18) without permission from the Executive Director Stewardship or a personnel member nominated for the purpose by the Executive Director Stewardship.
- Parents must also have access to everything provided to their children. For example, parents should be made aware of how Social Media is being used, be told how to access the sites, and be given the opportunity to be copied on all material sent to their children via social networking (including text messages). While parents should be provided with the same material as their children, it does not have to be via the same technology (that is, if children receive a reminder via Twitter, parents can receive it in a printed form or by an email list).
- The youth minister or the Executive Director Stewardship must approve each request by youth for membership in the social networking site after verification of current participation or leadership in the youth program.
- Church workers are encouraged to save copies of conversations whenever possible, especially those that concern the personal sharing of a teen or young adult.
- No pictures, images, videos or other releases except those that are newsworthy or of general interest may be identified or linked without permission of the person or persons depicted. See Consent to Photograph a Child or Adult Forms No picture, image or video of any minor may be posted without verifiable consent of the minor's custodial parent or guardian. Verifiable consent can take the form of a written release/permission form, an email from a parent or guardian, or spoken permission by a parent or guardian in the presence of another adult.
- In photographs of youth activities, youth should not be "tagged," or identified by name, or any other identifier, which might cause them to show up in search engines. On the original social networking site, it is recommended that the "no tagging" option be set.
- Because of the potential for inappropriate content or welfare concerns the page/site should be monitored daily by site administrators. Anyone who conducts a site relating to youth should sign up to receive emails about page activity and respond to them throughout the day. A plea for help that goes unanswered can be dangerous for teens and their families and damaging to the parish, school, and/or organisation.
- All ministry leaders should be familiar with Archdiocesan Safeguarding policies and relevant Code of Conduct and Privacy Policies.

Any person wishing to depart from this policy must seek prior approval in writing from the Executive Director Stewardship.

#### 4.3 Representing Catholic Archdiocese of Melbourne

No person may engage in online Social Media on behalf of Catholic Archdiocese of Melbourne unless explicitly authorised by the Catholic Archdiocese of Melbourne.

When communicating through Social Media or sending emails for pastoral or administrative purposes:

- “Pastoral and Community Rules” apply.
- Communications must be relevant and consistent with the mission of the Catholic Church in Australia and the policies of Catholic Archdiocese of Melbourne.
- Exercise caution when engaging in communications/conversations that may be controversial. In such cases, seek prior approval for messages from the Executive Director Stewardship, or relevant Director, manager or supervisor with the delegation to make relevant decisions (hereafter referred to generically as “manager or supervisor”).

It is not appropriate for the volunteers, employees or contractors to communicate via email or social media where such communication is, or might be, perceived to be made on behalf of the Church, if the communication is:

- embarrassing to the Church;
- inconsistent with the Church's doctrines, beliefs or principles;
- critical of the Church so as to compromise the relationship of trust between the employer or engaging party and the staff member;
- a gratuitous or personal criticism or attack on Catholic Archdiocese of Melbourne or Church leaders and clergy, its staff members, parishioners or affiliated institutions; or
- open to criticism as involving unfair racial, gender or religious profiling,
- likely to compromise public confidence or trust in the Church's moral or theological leadership in the community.

#### 4.4 Email usage

The availability of email by Catholic Archdiocese of Melbourne to clergy and employees is to enable the conduct of activities for Catholic Archdiocese of Melbourne.

Catholic Archdiocese of Melbourne owns any communication sent via email or that is stored on Catholic Archdiocese of Melbourne equipment. Catholic Archdiocese of Melbourne and its authorised staff have the right to access material on your computer at any time. Please do not consider any digital communication, storage or access to be private if it is created, received or stored on Catholic Archdiocese of Melbourne computers or systems regardless of the time or place any such activity occurs.

It is your responsibility, amongst other things, to consider and protect the good reputation of the Catholic Archdiocese of Melbourne.

The following guidelines govern the usage of email by clergy, parish staff, employees, contractors and volunteers of Catholic Archdiocese of Melbourne where there is a connection with the Catholic Archdiocese of Melbourne through use of its resources, systems, networks or time:

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| <ul style="list-style-type: none"><li>• Emails must only be used in accordance with Catholic Archdiocese of Melbourne's policies and procedures of ethical conduct and safety, and in compliance with applicable laws and proper business practices.</li><li>• All data contained within an email message or an attachment must be properly secured according to the Data Protection Standard.</li><li>• Emails identified as a business record shall be retained.</li><li>• Catholic Archdiocese of Melbourne confidential information must not be shared outside of Catholic Archdiocese of Melbourne, without authorization by Executive Director Stewardship, Vicar General or Archbishop at any time.</li><li>• Please keep this in mind, also, as you consider forwarding non-business emails to associates, family or friends. Non-business related emails waste Catholic Archdiocese of Melbourne's time and attention.</li></ul> |
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- Catholic Archdiocese of Melbourne's email system shall not to be used for the creation, storage or distribution of any disruptive or offensive messages, including offensive comments about colleagues, internal processes, race, gender, hair color, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. Employees who receive any emails with this content from any employee should report the matter to their manager or HR immediately.
- Catholic Archdiocese of Melbourne emails should not be automatically forwarded to a third party email system. Individual messages which are forwarded by the user must not contain confidential or files that are the property of Catholic Archdiocese of Melbourne.
- Reasonable and incidental use of the systems for personal emails is permitted. Those sending or receiving emails utilising Catholic Archdiocese of Melbourne equipment or systems should shall have no expectation of privacy in anything stored, sent or received.

#### **4.5 Group emails**

The approval of the Vicar General, Executive Director Stewardship, or Director, Office of the Archbishop, is required before an email can be sent to clergy, parishes or staff groups.

#### **4.6 Monitoring and moderation**

Moderating content refers to reviewing content and deciding if it contravenes the law or 'Pastoral and Community Rules'. To ensure a safe and positive experience for all people engaging with Social Media sites managed by Catholic Archdiocese of Melbourne, we will adopt a consistent approach to moderating user-generated content:

- Social Media platforms of Catholic Archdiocese of Melbourne are monitored by the Director of the Archbishop's Office or nominee; and
- personnel managing Social Media accounts must monitor content daily (during work hours) to ensure that any adverse content is identified as early as possible, and assess content against the Moderation Guidelines below. They should then take any necessary action accordingly.

#### **4.7 Personal use of digital communications platforms**

We respect the right to participate in Social Media in private lives. In doing so, clergy, parishes, employees, contractors and volunteers must not behave in a way that conflicts with either the Catholic ethos or the mission of the Catholic Church in Australia. The same rules apply as those that govern staff engagement on Social Media sites maintained by Catholic Archdiocese of Melbourne.

Many personnel of Catholic Archdiocese of Melbourne will be active in their parishes and communities and in Catholic charities. If you are in any doubt whether the content, tone or positioning of your Social Media activity will have an adverse impact on Catholic Archdiocese of Melbourne, please seek guidance from your manager or supervisor.

#### **4.8 Breach of policy**

If an employee of Catholic Archdiocese of Melbourne breaches this Policy then he or she will face disciplinary action. There may be a range of consequences including counselling, training, a written warning or termination depending on the severity of the breach. Comparable processes and consequences will follow in the case of persons other than employees bound by this policy.

Where laws are broken while using Social Media, the individual will be personally responsible and liable. Federal and State laws cover such matters as bullying, harassment, discrimination, intellectual property and privacy. If you have any concerns about possible breaches of any laws, please seek guidance from your manager or supervisor who will report it accordingly to senior management.

All inappropriate or unlawful content online relating to Catholic Archdiocese of Melbourne, or content that may breach this policy, should be reported to the Director Human Resources. Catholic Archdiocese of Melbourne will investigate internal or external complaints regarding the use of digital communications.

Catholic Archdiocese of Melbourne may direct clergy, parishes, employees, contractors and volunteers to remove content from a personal website or Social Media platform.

#### 4.9 Determining the Audience: Privacy, Transparency and Common Sense

The application of this Policy does not translate to automatic rules in every possible work situation. Common sense and discretion is required in application of this Policy and others relating to privacy, Internet use and emails.

Some departments and agencies in Catholic Archdiocese of Melbourne have a primary aim to produce external communications and promotions as part of the mission of the Catholic Church in Melbourne. Other departments will be more involved in providing one-on-one advice to parish priests on finance, property or human resources where confidential communications are stock-in-trade.

The application of Policy features prominently in the initiation of messages and posts, but it is equally important to apply privacy in responding to requests initiated in other departments of Catholic Archdiocese of Melbourne. Using hypothetical names, the following example illustrates some of the challenges:

##### **HYPOTHETICAL EXAMPLE:**

On behalf of Catholic Archdiocese of Melbourne, “Suzy” has to provide the date of birth of a parish priest “Father John” to a Government regulator. She seeks the date from “Fred” who holds this information for all priests under lock and key. Fred responds quickly and efficiently, sending an email to Suzy within half an hour with Father John’s date of birth, copying it to “third parties” being his supervisor, Suzy’s manager and to “Tony”, Fred’s cousin whom Father John once baptised.

Suzy is alarmed that someone copied her initial email and Father John’s date of birth to “third parties”. Suzy takes her concern to the Privacy Officer within Catholic Archdiocese of Melbourne who conducts an investigation.

The investigation finds that there are in fact FOUR breaches of privacy:

- Fred had no right to provide Father John’s date of birth to anyone other than Suzy.
- Fred circulated Suzy’s original private email to third parties without her permission.
- When Fred copied the email to his cousin “Tony”, the line between personal and professional use of Catholic Archdiocese of Melbourne communications was blurred.
- Fred exacerbated the situation by using a “cc” facility in his email so that Catholic Archdiocese of Melbourne staff inadvertently obtained Tony’s personal information (name and email address) and, conversely, Tony obtained similar information on key personnel within Catholic Archdiocese of Melbourne. Blind copying with a “bcc” facility would have mitigated this affect.

The investigation suggests that Fred’s response should have been as follows:

- Fred should have provided his reply including Father John’s date of birth to Suzy without copying to anyone else.
- Fred should then have contacted Suzy separately and asked if she was fine with him telling his supervisor and Suzy’s manager that he had fulfilled Suzy’s request (but still not disclosing Father John’s date of birth to them).
- Fred should not have disclosed Father John’s date of birth to his cousin *under any circumstances*.

In determining the audience for Social Media and other communications, make sure you fully understand the options for setting audiences on different Social Media platforms and use them appropriately:

- “cc” and “bcc” when copying email messages:
  - The “cc” facility should only be used when there is a good reason for sharing the responses on an originating email among all recipients (e.g. approval and comment by attendees on minutes of a meeting).
  - “bcc” is useful in mass emails of an informational kind to go to a wide range of contacts where nobody will be offended and you thereby avoid publishing email addresses of persons who will be strangers to each other. Do not use “bcc” to mislead recipients about who is seeing the correspondence. If it is appropriate for another person to see the email, forward on the sent item.
- “closed”, “secret” and “public” groups on Facebook. Posting for “public”, “friends” and “friends of friends”;

- Audience controls on platforms such as LinkedIn, Twitter and Instagram.

Wherever possible, ensure your manager or supervisor understands and authorises the proposed audience for your posts or messages.

#### 4.10 Password Protection

Authorised employees engaging in digital communications on behalf of Catholic Archdiocese of Melbourne are responsible for maintaining the integrity of their system password. A system is accessed by a username. Employees will be held accountable for any Social Media attributed to their username. Employees are not to use another person’s password without approval from Catholic Archdiocese of Melbourne

### 5. RELATED LEGISLATION

Links:	
Legislation	<ul style="list-style-type: none"> <li>• Privacy Act 1988 (Cth)</li> <li>• Privacy Amendment (Notifiable Data Breaches) Act 2017</li> <li>• Victorian Child Safety Legislation (various Acts)                             <ul style="list-style-type: none"> <li>○ (<a href="https://www.cam.org.au/Professional-Standards/Child-Protection">https://www.cam.org.au/Professional-Standards/Child-Protection</a>)</li> </ul> </li> <li>• Crimes Act 1958 (Vic)</li> <li>• Wrongs Act 1956 (Vic)</li> <li>• Spam Act 2001 (Cth)</li> </ul>

### 6. RESPONDING TO DIGITAL COMMUNICATIONS

Level	Comment	Description	Examples	Response process	Issues log?
1	Positive	Anything favourable	“I think you do great work” “Great video/story”	Say thanks! (Optional: screenshot and share with team and manager / supervisor)	×
2	Neutral	Neither good nor bad	“I had a similar experience”	Commenting is optional	×
	Neutral	Enquiry within knowledge base	“Can anyone access this service?” “Is this service free?”	Acknowledge and respond appropriately.	×
	Neutral	Enquiry requiring specialist response	“What can I expect from a counselling session?”	<p><b>Take a screenshot.</b> Reply: “Our [program] is better placed to answer your question. Let me ask them and get back to you.” Email program to provide written response. Post response along with “If you have any other questions, please email [branch]@cam.org.au”</p> <p>Note – if the question is of a personal nature, suggest a private message with their contact details</p>	✓

Level	Comment	Description	Examples	Response process	Issues log?
3	Negative - respond	Service/organisation complaints	"I left a message with the receptionist and no one called me back"	<b>Take a screenshot.</b> "Thanks for your feedback; we're always looking to improve our services. I've passed this on to a relevant officer, but if you'd like a direct response, please send me a private message with your contact details" Forward screenshot to the relevant officer.	✓
	Negative - respond	Forced adoption	"You forced me to give my baby up for adoption"	<b>Take a screenshot.</b> "Your comment has been passed on to our relevant officer but if you'd like a direct response, please send me a private message with your contact details" Forward screenshot to the relevant officer.	✓
	Negative - respond	Complaints about the Church/Catholic Archdiocese of Melbourne	"It's disappointing that Catholic Archdiocese of Melbourne has not commented on ...?"	<b>Take a screenshot.</b> If appropriate (i.e. if complaint is of a specific nature), forward screenshot to your Director.	✓
4	Negative - ignore	Negative comment by a "troll" (deliberate trouble-maker)	"All priests are paedophiles"	<b>Take a screenshot.</b> The rule of thumb is "do not feed the trolls" however repeated behaviour may escalate to Level 5.	✓
5	Negative - remove	Offensive, malicious or spam (it breaches our 'Pastoral and Community Rules')	"[Person's name] is a %^&*"	<b>Take a screenshot.</b> Never respond in similar, offensive language. Remove the comment and explain that it has breached "Pastoral and Community Rules". Warn the offender and block if repeated.	✓
6	Crisis	Legal or criminal ramifications (e.g. threat of violence, breach of confidentiality, defamation, PR disaster)	"I'm going to break into your office."	<b>Take a screenshot.</b> Escalate immediately to your Director or supervisor to assess whether the matter demands referral to the police.	✓

SOURCE: adapted from a similar table in *Social Media Procedure* in use for CatholicCare personnel.