Social Media & Digital Communication *Policy*

Archdiocese of Milwaukee

2020

Parish/School Use of Social Media and Digital Communication

Policy Compliance

This policy applies to all clergy, youth ministers, school and parish employees, social media administrators, coaches and volunteers who are employed by, acting as a representative of, or affiliated with an Archdiocese of Milwaukee parish, school or affiliated organization.

It must be understood that, at all times, activities on behalf of the Church in the Archdiocese of Milwaukee on social media or through the use of digital communication must mirror God's love and the teachings of the Church. Online or offline, there must always be respect for human dignity.

Using social media or digital communication on behalf of the Church or in the Church's name should be seen as an educational and evangelizing tool to invite people into a deeper relationship with Jesus Christ through the promotion of school and ministerial programs. Although digital communication and social media are important tools, it is vital that this form of communication should not replace face-to-face interactions in ministry.

Who to Contact with Questions

Clergy, teachers, catechists, principals, coaches, DREs , youth ministers and volunteers: Safe Environment Office (414) 769-3449	**School development or marketing: Schools Marketing Office (414) 769-3453**	**Social media or website administrators: Communications Office (414) 769-3435**

Unacceptable Use of Social Media

Every parish and/or school personnel that manages or contributes to social media sites should be made aware of and abide by this Social Media and Digital Communication Policy of the Archdiocese of Milwaukee.

Social media on parish and school related pages must NOT be used for:

- Selling of goods or services for personal benefit
- Defaming the character of any individual or institution
- Divulging any personal information about children, vulnerable adults or any person that would jeopardize their safety or well-being in any way
- Personal attacks of any kind
- Distribution or to obtain inappropriate or illegal content
- Any other use deemed inappropriate by site administrators

It is discouraged that any staff, parent, student, etc., create a social media page on behalf of the archdiocese, school or parish without prior school or parish permission or without parish or school personnel assigned as an administrator to such a page. Unauthorized sites may be referred to the Electronic Service Provider for possible actions such as removal or deletion of the account.

Any adult using a social networking site who ministers to children or youth should set very strict privacy account settings.

Social Media Administrator Responsibilities

Every parish and/or school should have at least two (2) social media site administrators.

All appropriate individuals at the parish and/or school (e.g., pastor, principal) must be aware of, and give approval for, using a social media site for parish and/or school programs.

Examples of Sites that Require Administrators *(This list is not all inclusive)*

Facebook

Twitter

Instagram

YouTube

WhatsApp

Tumblr

Vimeo

Skype

Google+

Before You Post on Social Media

PERMISSION

Do you have the proper consent form(s) signed, giving you permission to post photos of minors? Make sure parents/guardians have signed the consent form(s).

CATHOLIC FAITH

Keep content focused on education, information and expression of our Catholic faith.

KEEP INFORMATION PRIVATE

Do not give out detailed information about students. Last names and addresses are examples of what to keep private.

MONITOR

After you post content, keep watch. Monitor comments to ensure that replies and comments are appropriate, keeping things positive and everyone safe.

Social Media Administrator Responsibilities/Guidelines

- Two administrators must be appointed. (Must be adults, over the age of 21.)
- Real names must be used. (An administrator of a site must NOT use a pseudonym.)
- Set privacy settings to the most secure setting available.
- All information posted to the site must be true and verifiable.
- Monitor on a regular basis all content, comments, interactions and posts on social media for acceptable use.
- Know your friends, fans and followers for your social media site. If you allow "followers" on your social media site, be sure to familiarize yourself with who they are.
- Delete posts contrary to Church teachings or in violation of the Code of Ethical Standard for Church Leaders.

The adult supervisor(s) of the site should always remain in control of the conversations and comments. Inappropriate material or content that details inappropriate behavior should be addressed and removed from the site. For social media apps or groups for ministry, pay close attention to the site's security and allow only those who are approved participants access to the site

All interactions on social media need to remain transparent. Transparency means anything the administrator(s) of a social media site posts or communicates is visible to anyone who has access to that site.

Social media posts and comments by followers or friends must mirror God's love and the teachings of the Church. Once something is posted on a social media site or online, it becomes available to all and may be impossible to completely remove from the internet.

Schools, parishes, parents, friends and followers must exercise caution with regard to exaggeration, vulgar or inflammatory language, copyrighted materials and derogatory remarks or characterizations. Posts or comments made by social media followers that seek to undermine the Church's teachings should be deleted by social media administrators, with a private message sent explaining how the comment does not align with Church teachings, and questions or concerns may be addressed by calling the school or parish. Administrators should keep in mind that questions regarding Church teachings on social media can serve as an opportunity for evangelization and respectful dialogue. Nevertheless, if a social media follower continues to leave inappropriate comments, it is advised that the school or parish block the user from the social media site. **Comments or content posted on social media that is criminal or poses a potential safety concern must be reported to law enforcement immediately.**

Ministry Note

Adults who wish to use a social media site on behalf of a school or parish in order to connect with the youth to whom they minister should use a closed or private social media group account that youth and their parent(s) and/or guardian(s) may join, as long as they have the permission of the school or parish first, as well as a school or parish staff person as part of the group. Youth and their parent(s) and/or guardian(s) should then be invited to join a group rather than requesting to "friend" an adult on his/her personal account. Parent(s) and/or guardian(s) must have full access to the site and monitor it frequently.

It is encouraged that adults who connect with youth to whom they minister create a separate social media account/ profile to create a line of privacy and maintain healthy boundaries with youth. Individual personal profiles on social media sites should not be used for ministry or work-related projects.

The Archdiocese of Milwaukee recommends that clergy, parish/school employees, parish/school volunteers or lay leaders NOT accept friend requests from minors.

Photos, Videos and Audio Recordings

The child's representative (principal, teacher, DRE, youth minister, etc.) has the responsibility of respecting the wishes of the parent(s) and/or guardian(s) regarding their child's image or likeness being used in any form of marketing, social media or digital communication. The parish or school must make every effort to protect the digital footprint of a child. **The safeguarding standard is to ONLY post or share photos, videos or audio recordings of minors in groups of two (2) or more children.**

Representation of Minors in Groups of Two (2) or More

Sharing photos, videos or audio recordings of children on a parish or school's website, social media platform, parish bulletin or other form of publication is an effective way to update parents, share event results or celebrate accomplishments.

Posting, publishing or otherwise making public the photos, videos or audio recordings of minors is only permissible when ALL of the following requirements are met:

- Parental/guardian permission has been obtained via signed *General Consent Form for Child Photo, Video and Audio Use*
- The image has been reviewed and approved by at least two (2) school/parish staff or designated adult volunteer
- The images are posted after the activity is completed so location information of a minor is not available
- Minors are not identified by name, but rather by group (e.g., soccer team, 4th grade class, etc.)
- All other archdiocesan guidelines represented in this policy are met

Representation of Individual Minors

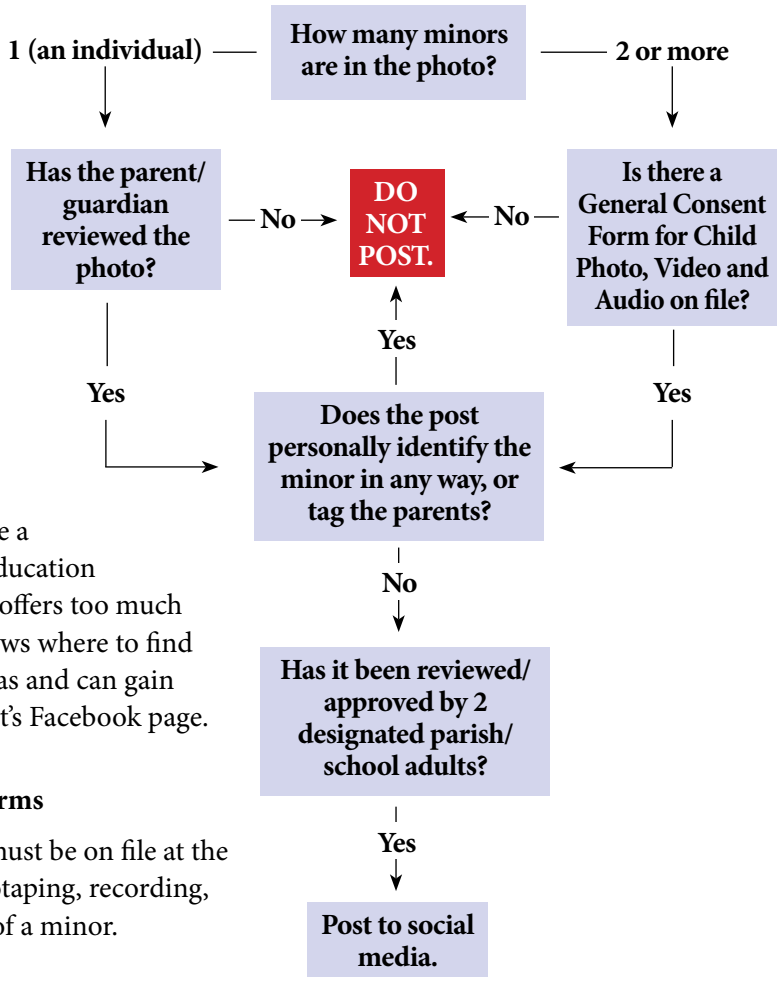
In the occasional instance when a school or parish wishes to share a photo, video or audio recording of a single child for marketing or promotional purposes, please make sure ALL of the following requirements are met:

- Parental/guardian permission has been obtained via signed *General Consent Form for Child Photo, Video and Audio Use*
- The image has been reviewed and approved by at least two (2) school or parish staff/designated adult volunteer
- The parent/guardian is provided the image for her or him to review and approve the picture prior to posting or publishing it

  Sample language is provided below.

  > *"Parish/School Name"* would like to use this photograph/video/audio recording of *"minor's name"* for marketing or promotional purposes by *"how the image will be used."* Please let us know if you do not wish us to use this image for these purposes by contacting *"name of school/parish contact person"* by *"this date."* If you do not notify the school or parish by this date, it may not be possible to remove this image from circulation."
- The minor's last name is not published. Last initial is acceptable if needed.
- Personally identifiable information is not published

Choosing Acceptable Photos



Personal identifiable information includes, but is not limited to, a minor's full name, home address, email, telephone number, photograph, video recording, audio recording, creative work or any other form of content that would allow someone to identify or contact the minor or individual.

The parent has the right to review the photo, video or audio recording the school or parish is requesting to use prior to the publication and distribution. It is not permissible to "tag" a photo on social media with a minor's identity or information.

An individual student in a photo may seem like a good idea to promote the school or religious education program, but it can easily be very harmful if it offers too much information. Once posted, a predator now knows where to find the child after school, interests that the child has and can gain more information through accessing the parent's Facebook page.

Photo, Video and Audio Recording Consent Forms

Verifiable consent from a parent or guardian must be on file at the school or parish prior to photographing, videotaping, recording, copying or distributing any image or likeness of a minor.

General Consent Form for Child Photo, Video and Audio Use

Parent(s) and/or guardian(s) must authorize consent for their child to be featured in photos, video or audio recording for use for promotional, marketing, or educational purposes by the parish/school.

Parent(s) and/or guardian(s) only need to sign this form once per year, but can rescind this consent at any time. The form must be kept on file at the school or parish by the onsite safe environment coordinator or school administrator.

Photos, Videos or Audio Recordings on Field Trips

Many times, parent chaperones will take photographs or video of children other than their own on a field trip. Opt-out language has been added to the *Parent/Guardian Permission Slip for Field Trip and Indemnity Agreement* to allow a parent to opt-out of photographs or videos being posted by a chaperone or staff for that specific field trip. All images posted or published by an adult acting on behalf of the parish/school should adhere to the Archdiocese of Milwaukee Social Media and Digital Communication Policy guidelines. It is recommended that all images be posted or published by the classroom teacher or supervisor to the official website or school social media account so that student privacy and parent wishes are respected for all students.

Photographs, videos, social media statuses and tagging should not be done in advance or in real time on social media sites. For example, if a chaperone posts "Going to the Milwaukee County Zoo with the kindergarten class today," the location of the kindergarten class has just been made available to anyone with access to that chaperone's social media account.

Digital and Electronic Communication with Minors

It is advisory for the protection and accountability of all individuals that digital (social media) and electronic communication (email and text) always be transparent. At least two (2) adults should always be included on any electronic communications that involve minors. That may mean that a parent/guardian is included, as well as another parish and/or school employee. It is highly encouraged that parishes/schools utilize app-based group communication systems instead of standard SMS texting. This provides additional security and transparency.

The school and/or parish representative (principal, teacher, coach, DRE, youth minister, etc.) has the responsibility of respecting the wishes of the parent(s) and/or guardian(s) with regard to their child's level of participation in the use of digital communication such as email, text, social media sites or apps where there is communication with an adult on behalf of the ministry of a church or school. This includes the right of the parent(s) and/or guardian(s) to be aware of the content and modes of non-public communications between adults (teachers, catechists, coaches, etc.) and their child.

Digital or electronic communications between an adult and a minor must be accessible to all minors and parent(s) and/or guardian(s) who consist of a particular group. For example, if a coach chooses to communicate with her team and parents via Whats App, and one team member's parent has chosen to receive communication via text instead of the designated app, then the coach must make sure equivalent communication is sent to that team member and her parents so all members receive the same information and no one is excluded from the communications.

Remember that relationships between adults and minors are never that of a friendship or a peer relationship. Interaction on social media sites or through digital and electronic communication should be used strictly for the purpose of educational or ministerial communication.

Parent/Guardian Opt-Out of Digital Communications Form

Ministry Note

We recommend schools/parishes that utilize learning management systems have security settings that do not allow an adult user to alter prior messages sent.

The school and/or parish representative (principal, teacher, coach, DRE, youth minister, etc.) must make parent(s) and/or guardian(s) aware of a parish's and/or school's anticipated use of digital communications. This can take the form of a written letter or an email stating the intended purpose of the site or communication device, as well as how the parent(s) and/or guardian(s) can access the site.

Parent(s) and/or guardian(s) who do not wish to have their child receive any digital communication from an individual/parish/school must opt-out on the *Parent/Guardian Opt-Out of Digital Communications Form.* The parent(s) and/or guardian(s) must indicate on the form how they will receive digital communication from the individual/parish/school.

Archiving Conversations

Parent(s) and/or guardian(s) have the right to review any non-public social or digital communication between their child and an adult employee or volunteer, including but not limited to, a teacher, coach, catechist, pastor, etc.

All employees or volunteers must be aware that all communication between themselves and any unrelated minor is subject to review.

Ministry Note

Should a parent/guardian request to review a group communication, other minors' communications in the group should be redacted.

Mandatory Reporting

A copy of the Archdiocese of Milwaukee's Mandatory Reporting Policy can be accessed on the Safeguarding All of God's Family page at www.archmil.org/MandatoryReporting. For the Spanish version please visit www.archmil.org/MandatoryReporting-Spanish.

Mandatory reporting laws apply to all school employees and clergy. Archdiocesan policy also requires all parish employees and volunteers to report.

Ministry Note

Any communication involving a member of the clergy, employee or volunteer to or from a minor must be stored, with the ability to be retrieved and provided upon request to a parent, law enforcement agency, supervisor, principal, Vicar for Clergy or the Archdiocese of Milwaukee Safe Environment Office. We recommend these communications be kept until the minor reaches 18 years of age.

When to Report Abuse

Laws regarding mandated reporting of suspected abuse/neglect/exploitation of minors/potential threats of violence apply in the virtual world and digital communications as much as they do in the physical world.

Mandatory reporting laws apply not only if there is an occurrence between an adult and a minor, but also applies when there is unlawful or suspicious behavior between two or more minors (e.g., harassment, cyberbullying, sending and/or receiving pornographic images), or a threat of violence to a school or parish or person.

If an action or behavior occurs off-campus or off-site, and the opinion is that it has done or has the potential to do harm or adversely affect or jeopardize the safety of others, action must be taken.

How to Report Abuse

If abuse, neglect, criminal activity or exploitation of minors is occurring or there is suspicion that it is occurring, contact a local law enforcement department immediately. Any instance of abuse involving a person currently under 18 years of age (a minor) should immediately be reported to the civil authorities.

If a report of sexual abuse of minors involving church or school personnel is made to local law enforcement, notification should also be made to the victim assistance coordinator who is available to support abuse survivors. A formal complaint of abuse can be made to the archdiocese by calling the victim assistance coordinator at 414-758-2232.

An alternative way to make a formal report of sexual abuse by church or school personnel for those not wanting to contact the archdiocese is available 24 hours a day/7 days a week through the Aurora Health Care Healing Center by visiting www.aurorahealthcare.org/healing-advocacy-services or calling 414-219-5555.

Threats of Violence

Wisconsin 2017 Act 143 states that any serious and imminent threat of violence in or targeted at a school that threatens the health and safety of a student , school employee or the public MUST be reported to law enforcement authorities immediately via the emergency number. This includes statements made by an adult or a minor, internet or social media postings involving a threat of violence or harm to a person or institution, or any correspondence that indicates a threat such as emails, texts, phone calls, letters, or graffiti.

Policy Non-Compliance or Violation

When reported in good faith, someone reporting suspected activity is protected from civil and criminal liability according to Wisconsin State Statutes 48.981(4) and 175.32(4). Mandated reporters that fail to report abuse or threats of violence are subject to a fine of $1,000 and up to six (6) months in jail according to Wisconsin State Statutes 48.981(6) and 175.32(5).

Children's Online Privacy Protection Act

Be aware of the Children's Online Privacy Protection Act. This federal legislation oversees how websites interact with children under the age of 13. You can find out more at www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule.