DIOCESE OF
ALLENTOWN

DIOCESE OF ALLENTOWN
SOCIAL MEDIA AND ELECTRONIC COMMUNICATIONS POLICIES

EFFECTIVE 1 AUGUST, 2025

DIOCESE OF ALLENTOWN

1 August 2025

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 of social communication, 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.

With the new Pontificate of His Holiness Pope Leo XIV, there has been a renewed emphasis on the appropriate and effective use of digital communication and social media to spread the Gospel of Jesus Christ. Under his inspiration, the Diocese of Allentown is adopting these new guidelines to form our conscience and guide our actions in using these tools for each of our ministries. 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
Table of Contents

Section I. Scope

Section II. Definitions

Section III. General Policies

Section IV. Policies for Communications with Minors and Vulnerable Adults

Section V. Policies for Creating and Administering Church Websites and Social Media Accounts

Attachments:

1. Acknowledgement and Consent Form for Social Media and Electronic Communications Policies

2. Acknowledgment and Consent Form for Policies for Creating and Administering Church Websites and Social Media Accounts

3. Acknowledgement and Parental Consent Form for Minors to Receive Communications through Approved Platforms/Applications

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 Church Representative who creates or administers a website or Social Media account 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 other existing Diocesan policies. These policies do not supersede applicable laws governing Social Media and Electronic Communications, but this version of the Social Media and Electronic Communications Policy does supersede prior versions of this policy. 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 and activities.

Church Representative:

A "Church Representative" shall include any person 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 (including, without limitation, paid coaching staff);

Volunteers of the Diocese of Allentown or its parishes, schools, ministries, or related entities (including, without limitation, CYO, youth ministry, and unpaid interscholastic coaches);

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.

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 and Social Media.

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. This term shall include both Personal Social Media and Diocesan Social Media accounts.

"Personal Social Media" shall mean a Social Media account, regardless of platform, that is operated by a Church Representative for his/her personal use, including personal professional development. Personal Social Media shall not be regularly used to promote or communicate about events or activities of the Church.

"Diocesan Social Media" is a Social Media account, regardless of platform, that is operated by a Church Representative, and that is designed to communicate with members of the community and the general public regarding events or activities of the Church. This term may include, without limitation, Social Media accounts created for Church clubs, sports, and/or fundraising activities.

Student:

"Student" shall mean any individual, whether or not a Minor, who is or has been or will be enrolled in any Diocesan school within twelve (12) months of the date of the Electronic Communication or Social Media interaction.

Vulnerable Adult:

"Vulnerable Adult" are those individuals over the age of eighteen (18) who, due to incapacity, mental or physical illness, advanced age, or other factors, are unable to care for themselves, make informed decisions, or seek help independently.

Written Consent:

"Written Consent" shall mean the attached annual consent (Attachment 3), which must be signed and dated by a parent or legal guardian granting consent for the specific communication, event, or series of events. Verbal, electronic or other consents shall not constitute Written Consent for purposes of this Policy. Obtaining Written Consent from a parent or guardian of a Minor or Student shall not excuse adherence to these and other Diocesan Policies.

III. General Policies

A. The following General Policies apply to Church Representatives when using Social Media and Electronic Communications.

1) **Church Teachings** – Due to the nature and mission of the Catholic Church, all Church Representatives 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 expressly 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 to represent the official position of the Church.

4) **Electronic Communication with Minors or Students** – Church Representatives shall not engage in Electronic Communications with Minors and/or Students, except through platforms and applications approved through the Diocese. If in doubt, contact the Secretary for Catholic Health and Human Services & Youth Protection for Guidance.
5) **Posts Involving Minors or Students** – Obtain Written Consent from parents/guardians before posting photos, videos, or personally identifiable information of Minors or Students. For photos or videos of large groups of Minors or Students 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, particularly Minors or Students. 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 or Student, including personal contact information, without Written Consent.
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 written approval; this prohibition includes using 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** – Any Church Representative who creates or administers a website or Social Media account on behalf of the Church or a Diocesan Social Media account must, in addition to following these General Policies, (a) notify the site administrator (principal, pastor, administrator) of the website or Social Media account, the topic thereof, identify the administrators of the website or Social Media account, and provide the site administrator with access thereto, and (b) 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 Church Representatives posting on Diocesan Social Media accounts 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 accounts and Diocesan Social Media accounts separate.
3) Do not use Personal Social Media accounts for Church ministry, service, or employment, and Church Representatives shall refrain from using Personal Social Media accounts while actively engaged in Church-related activities.
4) Do not create unofficial Social Media accounts or websites for any Church-related purposes or for purposes that give the appearance of being an official Social Media account for Church-related purposes. By way of example, and not limitation, unofficial Social Media accounts for clubs and sports shall be avoided.
5) 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, coach, volunteer, etc.).
6) Employees of the Church must be mindful of related employment policies.
7) 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, Students 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, Students and Vulnerable Adults.

Church representatives using Social Media or Electronic Communications with Minors, Students 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, Students 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, one of which must be the pastor/principal/administrator, and who is compliant with the Diocese's child protection policies must have full administrative access to all Diocesan Social Media accounts to be used with Minors, Students 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 Diocesan 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).
5) All Electronic Communications must only be made using platforms and/or applications approved by the Diocese.

B. **Time frames**

Set clear and appropriate timeframes for Social Media and Electronic Communications involving Minors, Students and Vulnerable Adults. 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 7PM.

C. **Parent/Guardian Notification**

1) Parents/guardians must provide Written Consent for communications (Social Media and/or Electronic Communications) to be used with Minors, Students 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, Students or Vulnerable Adults must include or be accessible by:
    a. the parents/guardians; and
    b. at least two adult Church Representatives compliant with the Diocese's Safe Environment requirements.
2) All Electronic Communications must only be made using platforms and/or applications approved by the Diocese.

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, Student, or Vulnerable Adult.
3) If a Minor, Student or Vulnerable Adult communicates with you in a manner that might be construed as having inappropriate sexual, romantic, or overly familiar or intimate overtones, you shall promptly notify your pastor/principal/administrator and keep a copy of the communication to provide to your pastor/principal/administrator.

F. **Content Review**

1) When using Internet resources with Minors, Students 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) All content must be reviewed in advance before it is published.
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, Students or Vulnerable Adults should be used only for appropriate outreach, ministry, and education.
2) Pay special attention to monitoring content when Minors (especially teens), Students, or Vulnerable Adults are participating in Social Media or Electronic Communications. Be vigilant for pleas for help from Minors, Students, 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, Students, or Vulnerable Adults, especially those involving issues personal to the Minors, Students, or Vulnerable Adults.
5) Recognize the difference between initiating friend requests with Minors, Students Vulnerable Adults and accepting them. Church Representatives should never initiate friend requests with Minors, Students or Vulnerable Adults who are not immediate family. Accepting friend requests from a Minors, Students or Vulnerable Adults should be carefully considered and a Church Representative must receive Written Consent the parent/guardian of the Minor, Student or Vulnerable Adult prior to accepting such request.
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. If a Church

Representative is unable to strictly comply with all technical aspect of this Policy due to an emergency situation, the Church Representative shall promptly inform the pastor, principal or administrator of the circumstance and the Church Representative shall keep a copy of the Electronic Communications and/or Social Media posts to provide to the pastor, principal or administrator.

7) Online gaming often involves social networking. Church Representatives 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 (including, without limitation, clubs, programs and sports teams) (Church-related purposes), 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 these 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 websites and Social Media accounts for Church-related purposes at all times.
2) Never give a Minor, Student or unauthorized person any administrative control over account settings for websites or Social Media accounts for Church-related purposes.
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 Diocesan 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 Diocesan 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 website or Diocesan 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).
3) Church Representatives have an obligation to comply with COPPA. If any Church Representative has questions on compliance with COPPA, they should contact the Secretary for Catholic Health and Human Services & Youth Protection or the Executive Director of Human Resources and Information Technology for guidance.

H. **Best Practices**

1) Use Church websites and Diocesan Social Media accounts only for appropriate outreach, ministry and education.
2) Remove inappropriate posts and comments promptly from Church websites and Diocesan 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. Posts and comments that contain personal attacks; lewd, vulgar or obscene content; discriminatory or harassing content; promote violence or illegal conduct; relate to online gambling; harass third parties; contain materials protected by copyright; and/or contain inappropriate or incriminating images depicting sexual harassment, vandalism, stalking, drinking, drug uses, criminal activity or other inappropriate behavior must be promptly removed.
3) All posts and comments should be marked by Christian charity and respect for the truth. They should be on-topic and presume the goodwill 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) or no names.
5) Minors, Students and Vulnerable Adults should not be tagged without parent/guardian Written Consent.
6) When using Internet resources with audio for a group or audience, try to have closed captioning available for those who might require it.
7) The Diocese does not actively monitor Personal Social Media accounts for Church Representatives. Nonetheless, should the Diocese's attention be brought to a Personal Social Media account that demonstrates violation of this policy, violation of other Diocesan policies, lack of respect for the teachings of the Catholic Church, unlawful discrimination, other unlawful act(s), the Church Representative may be subject to disciplinary action.

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.

DIOCESE OF ALLENTOWN
OFFICE OF CATHOLIC HEALTH,
HUMAN SERVICES, AND YOUTH PROTECTION
OFFICE OF THE SECRETARY
POST OFFICE BOX F
ALLENTOWN, PENNSYLVANIA 18105-1538

Attachment 1

DIOCESE OF ALLENTOWN 2025
SOCIAL MEDIA and ELECTRONIC COMMUNICATIONS POLICIES
ACKNOWLEDGMENT and CONSENT FORM

To be signed by all clergy, religious, employees, volunteers, aspirants, and seminarians of the Diocese of Allentown. By signing below, I acknowledge, and agree to the following:

1. I have received, read, and understand the Diocese of Allentown's "Social Media and Electronic Communications Policies" (the "Policies").
2. I agree to abide by the Policies, as they may be updated from time to time.
3. I understand that any violation of the Policies may result in disciplinary action, including termination of employment or removal from ministry, or other service.

Printed Name: _____ **Date:** _____

Signature: _____

Diocesan Location: _____

DIOCESE OF ALLENTOWN
OFFICE OF CATHOLIC HEALTH,
HUMAN SERVICES, AND YOUTH PROTECTION
OFFICE OF THE SECRETARY
POST OFFICE BOX F
ALLENTOWN, PENNSYLVANIA 18105-1538

Attachment 2

DIOCESE OF ALLENTOWN POLICIES FOR CREATING AND ADMINISTERING CHURCH WEBSITES AND SOCIAL MEDIA ACCOUNTS

ACKNOWLEDGMENT AND CONSENT FORM

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 read and sign the Acknowledgment Form.

By signing below, I acknowledge and agree to the following:

I have received, read, and understand the Diocese of Allentown's *Social Media and Electronic Communication Policies* and *Policies for Creating and Administering Church Websites and Social Media Accounts* (collectively, the "Policies").

I understand and agree to abide by the Policies, which may be updated from time to time.

I understand that any violation of the Policies may result in disciplinary action, including termination of employment or removal from ministry or other service.

Church-related websites or Social Media accounts shall be owned by the Diocese of Allentown or the parish, school, or ministry for which the website or Social Media account was created or used. Neither I, nor any other individual, shall have or assert any ownership rights in any such websites or Social Media accounts, regardless of the name or contact information under which the website or Social Media account was created or registered.

I understand and agree that if I assert personal ownership rights over or take steps to exclude the Diocese of Allentown from accessing any website or Social Media account created or used for or on behalf of the Diocese, the Diocese shall be entitled to injunctive relief and to recover from me all costs and expenses incurred in pursuing relief, including attorneys' fees

I understand and agree that the Diocese shall have the authority to access all content and administrative controls of any website or Social Media account created or used for, or on behalf of, the Diocese or its parishes, schools, or ministries.

I hereby irrevocably consent to giving the Diocese full access to and control of any and all websites and Social Media accounts created or used for or on behalf of the Diocese or its parishes, schools, or ministries.

Date _____ Signature of Clergy/Religious/Employee/Volunteer _____

Location _____ Printed Nam _____

Attachment 3

DIOCESE OF ALLENTOWN PARENTAL WRITTEN CONSENT FORM

ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA

I, _____(insert name of parent or guardian), the parent or legal guardian of

_____ (insert name of Minor or Student), hereby consent to

_____ (insert name of parish, school, organization, club, sport team) to:

I _____DO or _____DO NOT authorize _____ (insert name of parish, school, organization, club, sport team) to use Minor or Student's name, image and/or quotes on Social Media pages related to _____ (insert specific event, series of events, sport, club, or purpose).

I _____DO or _____DO NOT authorize _____ (insert name of parish, school, organization, club, sport team) to communicate with Minor or Student using Electronic Communication platforms or applications approved by the Diocese related to _____ (insert specific event, series of events, sport, club, or purpose).

[CHECK APPLICABLE BOXES]

The Diocese of Allentown, the school, parish, or organization noted above, and their employees and volunteers shall not be liable for the release of any images, names, or other information permitted by this Written Consent. In no event shall this Written Consent be valid for more than twelve (12) months from the date executed.

I understand that I have the right to cancel or revoke the aforementioned permission at any time by contacting the pastor, principal, and/or administrator of the relevant school, parish, organization) in writing.

Printed Name: _____ **Date:**_____

Signature: _____

Diocesan Location:_____