

GUIDANCE 7

GUIDANCE ON THE USE OF TECHNOLOGY MEDIA POLICY

The Irish Franciscan Province needs to assess the benefits of technology and how this can be used safely and effectively, in line with rules that respect the dignity and rights of all users, particularly children and young people. Detailed policies and procedures are provided on the use of technology, including digital and online systems such as:

1. Use of the internet
2. Texting and emailing
3. Photography
4. CCTV and Web cams

The majority of occasions when people use mobile phones or computers or take photographs of children and young people do not provide any cause for concern. However, there are occasions when this is not the case. At the outset, it is important to identify the risks associated with the use of technology, and then to minimise the risks by putting in place measures outlined below.

CONSENT

The consent of parents/guardians/carers and children and young people should always be sought prior to engaging in any activity that involves the use of IT equipment outlined above.

General consent may be sought at the outset and/or it may be decided to ask for permission for set occasions. When seeking consent for the use of images or videos for Church purposes, the following should be considered:

1. The issue of consent for photography/videography for Church purposes should be addressed with parents/guardians/carers and the children and young people prior to the occasion, and the policy should be explained to all families attending.
2. In seeking consent for photos or videos, children and young people and families should be reminded about the rights to privacy and data protection of other children or young people, their families, and the wider community.

3. Those organising an event for Church purposes and who are seeking consent for photography or video usage, should be sensitive to the fact that many parents/guardians or carers are reluctant to allow the general viewing of their children or young people, or of children or young people in their care, on sites such as YouTube, Facebook.

USE OF INTERNET

It is recognised that the internet is valuable and widely used. When used in a Franciscan context, clear guidelines must be developed and inserted into the code of behaviour for each activity involving children and young people.

THE FOLLOWING ARE DEEMED UNACCEPTABLE BEHAVIOURS, AND MUST BE AVOIDED IN EVERY SITUATION

1. Visiting internet sites that contain offensive, obscene, pornographic, or illegal material.
2. Using a computer to perpetrate any form of fraud or piracy.
3. Using the internet or email systems to send offensive and harassing material to others.
4. Using obscene or racist language in computer-assisted communications.
5. Publishing defamatory or otherwise false material generated by oneself or by others through social networking
6. Introducing any form of malicious software into the network being used.
7. Intentionally damaging any information communication technology equipment.
8. Using another user's password or giving that password to a third party.

IT IS IMPORTANT THAT THE FOLLOWING IS MADE CLEAR TO ALL WHO USE THE INTERNET

1. All Franciscan friars, staff, volunteers, and group leaders must be made aware of their responsibility and sign up to appropriate use of the internet as part of a code of behaviour.
2. Responsibility is about safeguarding children, taking care of oneself, one's co-workers, and group leader.
3. Anyone using a shared computer requires their own individual password.
4. Training in appropriate and responsible internet and computer use is imperative in order to follow best practice in all activities that concern children, young people, staff, co-workers, and volunteers.

TEXTS AND EMAILS

It is best practice to contact children or young people only through their parents/guardians/carers. The most efficient way to do this via bulk texting and emailing, as texts and emails are quick and effective methods of communication. There are certain risks associated the use of texting and email, which must be managed.

THE RISKS OF TEXT AND EMAIL MESSAGING FOR CHILDREN AND YOUNG PEOPLE INCLUDE:

1. Inappropriate access to, use of, or sharing of personal details (names, numbers, email addresses).
2. Unwanted contact with children or young people by adults with bad intent, text bullying by peers.
3. Being sent offensive or otherwise inappropriate materials.
4. Grooming for sexual abuse.
5. Direct contact and actual abuse.

THE RISKS FOR ADULTS INCLUDE:

1. Misinterpretation of their communication with young people.
2. Potential investigation (internal or by statutory agencies).
3. Potential disciplinary action.

USING BULK (OR BUNDLED) TEXT AND EMAIL MESSAGING

Contacting children or young people through text or email should be done through their parents/ guardians/ carers. In exceptional circumstances where children or young people need to be contacted directly, bulk texting is the preferred method. This is where the same text or email message is sent to several young people involved with a particular activity or group.

The advantage of this approach is that it presents fewer opportunities for misuse and abuse than personal, one to one texting or emailing arrangements between staff or volunteers and children or young people. Therefore, one to one texting or emailing should be strongly discouraged and should only occur in exceptional circumstances. The same applies to emailing young people.

THE FOLLOWING GUIDANCE IS PROVIDED TO MINIMISE RISK TO ALL IN SUCH CIRCUMSTANCES:

1. Consent must be obtained from children or young people and their parents/guardians/carers prior to sending children or young people text or email messages. Parents/guardians/ carers of younger children should be offered the option to be copied in on texts and emails sent to their child.
2. Children's or young people's mobile phone numbers or email addresses should be stored safely and securely with access by staff or volunteers identified to the young people and parents/guardians/carers as a group leader.
3. All text and email messages must be sent via a bundle to a group of children or young people, i.e., the same standard text message is sent to every member of the group.
4. The text and email messaging system must make it clear to the recipient who sent the message.
5. Young people should not be able to respond. It is to be used only as a one-way communication channel.
6. The text and email message that are sent must never contain offensive or abusive or inappropriate language.
7. All text and email messages must include an opt-out option so children or young people can unsubscribe from email or texts or messages.

USE OF PHOTOGRAPHY

The use of photos on websites and in other online or hard copy publications can pose direct and indirect risks to children and young people. Franciscan friars, staff and/or volunteers wishing to use images of the children or young people they are working with should be aware of the following

1. The Franciscans have responsibility for the use of photography only if they plan to use the photography for Church purposes.
2. Photographs taken at events organised by family and schools such as Communions, weddings, or Confirmations do not fall under the responsibility of the Church or the Franciscans, unless they are being taken for Church purposes.

RISKS TO CHILDREN

A child or young person should not be able to be identified through a photograph. There is also a risk that the photo itself will be used inappropriately by others. Photos can easily be copied and adapted, perhaps to create images of child abuse, which can then find their way on to other websites.

HOW TO MINIMISE RISKS

1. Establish the type of images that appropriately represent the activity and think carefully about images showing children and young people on the Franciscan website or publication.
2. Never supply the full name(s) of the child or young person along with the image(s).
3. Only use images of children or young people in suitable dress and focused on the activity, rather than one particular child.
4. Obtain permission: the permission of parents/guardians/carers, and of the children and young people should always be sought when using an image of a child or young person.
5. The child's or young person's permission to use their image must be recorded (depending on his/her age and ability to give consent). This ensures they are aware of the way the image is to be used to represent the activity.

WHEN USING PHOTOGRAPHERS IN CHURCH CONTEXTS FOR CERTAIN SACRAMENTAL OR CHURCH ACTIVITIES:

1. Ascertain if the photographer requires vetting and, if they do, put them through the process.
2. Provide the photographer with a form of identification that must always be worn.
3. Do not allow unsupervised access to children or young people or one-to-one photo sessions events.
4. Do not allow photo sessions to take place away from the event, e.g., at a child's or young person's home.
5. Inform parents/guardians/carers, children, and young people that a photographer will be in attendance.

RESPONDING TO CONCERNS

Children and parents/carers and/or guardians should be informed that if they have any concern regarding inappropriate or intrusive photography, these should be reported to the Franciscan DLP, or the Franciscan in charge of youth ministry, or the Provincial, to ensure that reported concerns are dealt with in the same way as any other child protection or child safeguarding issue.

USE OF CCTV AND WEBCAMS

The increasing use of CCTV and webcams has significant implications, and it is essential that unless such systems are used with proper care and consideration, they can give rise to concern that an individual's private space is being unreasonably invaded or eroded.

Security of premises or other property is probably the most common use of a CCTV system and, as such, will typically be intended to capture images of intruders, or of individuals damaging property or removing goods without permission. If a data controller is satisfied that he/she can justify the installation of a CCTV system, he/she must carefully consider what it will be used for and if these uses are reasonable in the circumstances. Cameras placed to record external areas should be positioned in such a way as to prevent or minimise recording of passers by, or of another person's private property.

IF USING CCTV IN THE CHURCH OR ON CHURCH PROPERTY, IT IS ESSENTIAL TO CONSIDER THE FOLLOWING:

1. If CCTV cameras are in place, it is important to have very obvious signs informing Church personnel, parishioners, volunteers, and the public of this.
2. All uses of CCTV must be appropriate and fit for a specific purpose. As CCTV infringes the privacy of persons captured in the images, there must be a genuine reason for installing such a system.
3. If installing such a system, the purpose for doing so must be displayed in a prominent place and preferably behind a locked noticeboard where it will not be damaged or removed. In a church, an obvious place would be within the porch and at all entrances.
4. Images captured should be retained for a maximum of 28 days (see Section 2 [1] c [iv] of the Data Protection Act). An exception for a longer duration would be where images need to be retained specifically in the context of an investigation.
5. Tapes should be stored in a secure environment, along with a log of access to them. Access should be restricted to authorised personnel. Similar measures should be in place when using disc storage, with the creation of automatic logs of access to the images.

WEBCAM

There are a number of Data Protection requirements that must be met in relation to broadcasting on the internet. Section 2 (1) c (iii) of the Data Protection Act requires that any data is 'adequate, relevant, and not excessive' and fit for purpose for which it is collected.

Web cameras should be switched on only for the duration of Mass or other liturgy and switched off at the end. There should be no live streaming of churches when there is no Mass or liturgy taking place.

Recording people via a web camera and subsequently displaying such images over the internet is regarded as the processing of personal data. One of the key provisions regarding the processing of such data is that it must be done with the consent or knowledge of the individuals concerned.

Camera shots (images) of the congregation should be wide shots – minimising the possibility of easily identifying individuals with close-up images.

Consent should be obtained of altar servers and others taking part in liturgies (e.g., choirs, musicians, Ministers of the Word and of Holy Communion). In the case of children/young people, it is essential to have the consent of parents and/or guardians.

Signs should be placed at a range of entrances to the church and in other prominent locations, informing people that web cameras are in operation.

Members of the clergy and pastoral workers should sign forms consenting to their image being used for web broadcasting in the course of their regular duties. Copies of consent forms should be kept in the church records