



Guidelines for use of IT in a Church Context

AUGUSTINIAN PROVINCE OF IRELAND
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Introduction

The Augustinian Province of Ireland (hereafter referred to as 'the Province') has an ethical and a legal responsibility to maintain the highest standards of practice in the safeguarding of information about its members, staff members and those individuals, donors, agencies and others that interact with the Province.

The Data Protection Acts 1988 and 2018 and the General Data Protection Regulation (GDPR) 2018, govern how we process Personal Data. The aim of these guidelines is to ensure that everyone understands the concepts of data protection and is aware of their own responsibilities in relation to the Province's overall compliance with data protection law.

This document provides guidance regarding the Province's data protection obligations in the areas of email and texts, webcasting, CCTV, social media and photographs/film.

Whether through laptop or mobile device, all friars, volunteers and staff must use the internet appropriately and protect others, particularly children, from sites or materials that contain harmful, pornographic or illegal materials. The core responsibility is safeguarding children, taking care of oneself and one's co-workers.

While our Safeguarding principles and values are not to be compromised irrespective of circumstances, each Prior/P.P. in consultation with the Local Safeguarding Group and Ministry Co-ordinators/Leaders should look to put in place best practices to meet local needs. In short, local practice should reflect Province guidelines.

To summarise, respect the privacy of others: do not publish or cite personal details and photos of children, young people, co-workers, volunteers and friars without their written permissions or that of their parent/guardian in the case of children under 16 years. Parents must be consulted before children or young people under 18 years of age can become involved in church activities. Overall safe and secure storage of contact details and completed Permission Forms should be the guiding standard of practice.



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General:

In line with GDPR 2018, personal data is held by the Province only for as long as necessary for the purpose it was collected.¹ Appropriate security measures are taken to protect against unauthorised access to, or alteration, destruction, or disclosure of any personal data, either manual files or electronic, held by the Province in its capacity as Data Controller. Access to and management of personal data is limited to those who have appropriate authorisation and password access.

The Province is not responsible for individuals who attend events organised by the Province and take photographs/film and/or post comments on social media sites not controlled by the Province.

Consent is a legal requirement for communication under European GDPR Law along with a clear “opt-out” option.

Emails:

- Emails are subject to the GDPR in the same way as postal correspondence; therefore, care should be taken to make sure the email address is correct, and that the message gets to the right person.
- Emails are subject to the same retention schedules as manual correspondence (*See retentions schedules as part of the Augustinian Data Protection Policy*).
- If sending group emails about Church events, care must be taken to ensure all members of the group are over 16 years of age. If below 16 years, consent must be sought from a parent/guardian.
- Attachments in emails must be age appropriate if sent in a group context where some members may be under 18 years.
- A dedicated email address is recommended for events organised by the Province.

¹ See Augustinian Data Protection Policy – available for download on www.augustinians.ie/GDPR - Also European Data Protection Law (GDPR 2018) Art. 5.

Mobile Phone/Texting:

- Consent must be sought from a parent/guardian when members under 16 years are to be included in group texts.
- It is good practice to include parents of children under 16 years in all group texts so that messages are fully shared with everyone at the same time.
- Permission to use mobile phones at events organised by the Province is at the discretion of the organisers.
- A dedicated mobile phone for events organised by the Province is recommended.
- Personal phone numbers of friars, members of staff or volunteers should never be shared with a child under 18 years.
- Each person's contact details are to be stored securely, only shared with appropriate personnel and only used for the intended and agreed purpose.
- The sender of the text or email should always be shown clearly in the message (i.e. no reply needed) and the person receiving the message offered an 'unsubscribe option' each time.
- The use of mobile phones before, during and after church activities should be clearly agreed with participants 16 years or younger and their parent/guardian in advance.

CCTV:

- Where the Province intends to record activity on CCTV clear signage to that effect will be posted in full view.
- The use of CCTV is for security purposes only and will not be used to monitor the work of employees or volunteers.
- Images will be retained for 28 days and then deleted unless subject to an investigation by An Garda Síochána.

Webcasting:

- Webcasting is used to stream liturgical services into the homes of those who are unable to attend Church.
- Streaming will only be carried out for the duration of the liturgical event (e.g. Mass duration).
- Streaming materials will be securely stored, and access restricted to authorised personnel only who will maintain a manual or automatic access log.
- Clear signage to that effect will be posted in full view.
- Cameras are to be pointed directly at the Altar and not at the congregation.

- Where children under 16 years are involved as altar servers, choir members or readers then the consent of a parent/guardian is necessary. This could be covered in a 'General Consent Form' but the specific activities and the purpose for which the images will be used must be clearly set out.
- Circumstances may arise where a family may wish for the live broadcasting to be stopped temporarily, such as during a baptism or a funeral. Those involved should be given this option and an appropriate person delegated to access the control panel (i.e. break and reactivate transmission).
- Whether using tapes or discs, secure storage and access should be restricted to authorised personnel only and a manual or automatic access log maintained.

Photography/Filming

All friars, staff and volunteers should be mindful that the taking of photographs or digital images can reveal a person's religious belief and/or affiliation. Such personal data is regarded as 'special category personal data' and must be treated with appropriate sensitivity based on individual rights to privacy.

- Only those approved by the Province to photograph or film an event on behalf of the Province are permitted to do so.
- Individuals who photograph or film at an event organised by the Province in a private capacity are asked to be mindful of the kind of images they take and to ensure they do not cause hurt or embarrassment to a child.
- The Province is **not responsible** for individuals who attend events organised by the Province and film or photograph. Depending on the event, attendees may be asked not to take photographs or film.
- Photographs/Film will only relate to the activity/event in question.
- Photographs/Film will not focus on an individual child.
- No Photographs/Film will be taken of children engaged in non-public activities such as toileting or changing clothes.
- Children will not be photographed/filmed while distressed.
- Children should not be identifiable to avoid the risk of inappropriate and unsolicited attention.
- Copyright of all images taken by a photographer appointed by the Province at events organised by the Province will lie with the Province.

Social Media:

- Parental/guardian consent will be sought in advance of any postings of images of children under 16 years on Province web or social media sites.
- The Province is responsible only for legitimate uploads to its own web sites.
- The Province is **not responsible** for individuals who attend events organised by the Province and upload related images or comments to their own social media accounts.
- Be honest and open, while mindful of the impact your contribution might make to the public's perceptions and reputation of the Province.
- Do not post or forward a link to any abusive, discriminatory, harassing, derogatory, defamatory or inappropriate content.
- You are personally responsible for content you publish – be aware that it will be public for many years.
- The Province's website or social media sites will be monitored, and any comments deemed to be inappropriate or offensive will be removed, and the contributor blocked from posting.
- A friar, member of staff or Volunteer who receives a friend request from a child should decline the request.

End.

