Social Media and Private Communication Policy

Discalced Carmelite Friars, Anglo-Irish Province

1. Policy statement

The Discalced Carmelite Friars of the Anglo-Irish Province will do everything in our power to keep every person we reach online, or communicate with privately, safe from harm, and to respond promptly and openly when concerns arise. This policy applies that commitment to social media and private communication, and sits beneath the Province's overarching safeguarding policy and the Young Adult Ministry Safeguarding Policy, which it supplements rather than replaces.

We hold that every person is created in the image of God and has an inherent right to dignity and bodily integrity. The same closeness and openness that make online ministry fruitful — a group chat that keeps a community connected between gatherings, a direct message that answers a real question, a testimony that moves someone to consider a vocation — can also be misused. This policy exists so that our online presence is a sacred and safe space, exactly as our buildings are required to be.

We commit to:

- a culture in which safeguarding online is everyone's responsibility, and concerns can be raised without fear;
- running every official channel — public or private — through named, vetted administrators who are never a single, unaccountable individual;
- planning every use of social media and private messaging with its risks in mind, before it is used, not after;
- listening to, believing and supporting anyone who discloses harm through an online channel, and reporting without delay;
- following the 'One Church' approach of the Catholic Church in England and Wales, the Church's safeguarding standards in Ireland where they apply, and the eight National Safeguarding Standards of the Catholic Church in England and Wales (the CSSA standards), which this policy is built around and maps to in section 14.

2. Scope

This policy covers every use of social media and every form of private, text-based or video communication connected with the Province's public-facing and vocational work, wherever it is run from and whoever runs it.

People covered: friars, other clergy and religious, lay leaders and volunteers, visiting speakers, contributors to our publications, and anyone the Province authorises to post, moderate or message on its behalf.

Channels covered:

- Public social media accounts run in the name of the Province, a house, the Young Adult Ministry or Living Flame (currently Instagram, with others to be added as they are opened);

- Group chats connected with our ministry (for example the Living Flame WhatsApp group);
- One-to-one private messages, email, and video calls between any leader, friar or representative of the Province and a participant, enquirer or member of the public;
- Comments, direct messages and other interactions received through any of the above.

This policy does not cover a friar's or volunteer's purely personal social media use, except where section 7 (Code of conduct) applies to anyone who also holds a leadership role in our ministry.

3. Legal and Church framework

This policy is written to satisfy the eight National Safeguarding Standards of the Catholic Church in England and Wales, audited by the Catholic Safeguarding Standards Agency (CSSA), as they apply to our online and private communication. Section 14 maps each section of this policy to the relevant standard and its criteria in full.

Church framework

- CSSA National Safeguarding Standards, and the Province's own safeguarding policy, of which this is a supplementary policy.
- The Young Adult Ministry Safeguarding Policy, section 10 (Online communication, images and data), which this policy expands.
- Guidance of the Religious Life Safeguarding Service (RLSS), or the Province's safeguarding provider, on online and digital safeguarding.
- In Ireland, or for activities run with the Irish Region: Safeguarding Children: Policy and Standards for the Catholic Church in Ireland 2016 and the guidance of the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI).

Statutory framework (England)

- Online Safety Act 2023, so far as it bears on content we publish and on our moderation of comments and messages;
- Data Protection Act 2018 and UK GDPR, for any personal data collected through forms, group chats, direct messages;
- Sexual Offences Act 2003, as amended in 2022: a person in a position of trust in a religious setting commits an offence by sexual activity with a 16- or 17-year-old in their care, which extends to online conduct;
- Protection from Harassment Act 1997, where online contact becomes unwanted or persistent;
- Working Together to Safeguard Children (statutory guidance), where a child is involved in or affected by any online contact.

Where this policy and the Young Adult Ministry Safeguarding Policy appear to differ, the stricter provision applies.

4. Definitions

Official channel: any social media account, group chat, mailing list, web form or app run in the name of the Province, a house, the Young Adult Ministry or Living Flame.

Private communication: any one-to-one or small-group message, email, call or video call between a leader and a participant, enquirer or member of the public that is not visible to other administrators.

Leader: anyone who posts on, moderates, administers or messages through an official channel, whether friar, religious, priest, employee or volunteer.

Enquirer: anyone who contacts the Province through an official channel, including a social media comment or direct message, a group chat, whether or not they go on to have any further contact.

Child: anyone under 18. Young adult: a participant aged 18 to 35, as defined in the Young Adult Ministry Safeguarding Policy.

Adult at risk: as defined in the Young Adult Ministry Safeguarding Policy. Online contact can create or reveal vulnerability that is not visible in person — for example, someone discussing a vocation or a personal crisis late at night, alone, outside any structured setting.

Forms of online harm we watch for include:

- grooming: using an official channel to build a private, exclusive relationship with an enquirer, especially a vulnerable one;
- spiritual abuse conducted online: using the authority of a leader's role, or the urgency of a spiritual or vocational question, to encourage secrecy, dependence or a move to private messaging away from accountable channels;
- harassment, including persistent unwanted contact with someone who has not responded or has asked to stop;
- sharing of images or personal information without consent;
- impersonation, or use of an official channel's name or authority to deceive;
- exposure of children or adults at risk to unsuitable content through an official channel's public reach.

5. Roles and responsibilities

The Provincial holds ultimate responsibility for this policy, as for the overarching safeguarding policy it sits beneath. Day-to-day responsibility for online and private communication sits with:

- the House Safeguarding Lead for the Priory where a channel is based;
- the Young Adult Ministry Coordinator and Safeguarding Representative, for Living Flame's social media and group chats;
- a named Social Media Administrator for each official channel, who need not be a safeguarding specialist but who must have completed the training in section 12 and know the reporting route in section 11.

No official channel may be run by one person alone. Every channel has at least two administrators, so that no single person has unaccountable access to messages, comments or the account's settings, mirroring the "two leaders present" requirement for in-person events in the Young Adult Ministry Safeguarding Policy.

The House Safeguarding Lead and the Young Adult Ministry Safeguarding Representative review the list of channels and their administrators at least twice a year, and whenever a new channel is opened.

6. Setting up and administering official channels

No one administers an official channel, or leads a group chat connected with our ministry, until they have completed the same safer recruitment steps required of any ministry leader under the Young Adult Ministry Safeguarding Policy, section 6, applied here as follows.

1. Agreement of the House Safeguarding Lead or Young Adult Ministry Safeguarding Representative before a new channel is opened, or a new administrator is added to an existing one.
2. Identity check and, where the role involves routine contact with enquirers who may be children or adults at risk, an Enhanced DBS check on the same basis as any other leadership role.
3. Signed code of conduct (section 7) and basic safeguarding training (section 12) before the administrator is given access.
4. A written note of who holds administrator access to each channel, kept by the House Safeguarding Lead, and updated whenever access changes.
5. Removal of access promptly when someone stops leading, including former leaders' access to passwords, linked email addresses and connected devices.

A contributor who appears in our content (a testimony, an interview, a photograph) is not thereby an administrator and does not need these checks, but their own consent and sign-off is required under section 10.

Passwords and account access are never held by one person alone, are not shared outside the administrator group, and are changed whenever an administrator leaves.

7. Code of conduct for online and private communication

Leaders hold a position of trust online exactly as they do in person, and the power difference does not vanish because the contact is by screen. Every leader and administrator signs this code each year, alongside the Young Adult Ministry code of conduct where it also applies to them.

Leaders will:

- keep communication with an enquirer or participant on an official channel wherever possible, so that it is visible to at least one other administrator;
- keep the tone and content of any message professional and ministry-focused, in terms they would be content for the Safeguarding Lead to read;
- respond to messages within a reasonable time, and say plainly when a response will take longer, rather than leaving a vulnerable enquirer without acknowledgement;
- direct a pastoral or spiritual conversation that needs real depth into an appropriate in-person or phone setting, following section 9 of the Young Adult Ministry Safeguarding Policy, rather than conducting it at length over text or direct message;
- report any concern, including about a colleague's online conduct, using section 11;
- treat every enquirer with respect, whatever their age, background, belief or the nature of their question.

Leaders will not:

- move a conversation from an official channel to a personal or private account, number or email address without good reason and another leader's knowledge;
- pursue a romantic or sexual relationship with a participant or enquirer online, or behave in ways that could be read as such, including over-familiar language, excessive messaging, or private compliments on appearance;
- give or invite gifts, payments or links to personal accounts;
- send or request images that are intimate, undignified or inappropriate, or engage in any sexualised conversation;
- use spiritual authority online to direct major life choices, demand secrecy, or discourage someone from seeking advice elsewhere;
- promise confidentiality about harm disclosed online (see section 11);
- message a participant under 18 privately under any circumstances;
- use offensive, humiliating or discriminatory language, publicly or privately, including in jest.

A breach may lead to removal from any leadership or administrator role, and to referral under section 11.

8. Guidance by channel

8.1 Public social media (for example the Living Flame Instagram account)

- At least two administrators at all times, per section 6.
- Comments and direct messages are checked at least every two or three days; anything disclosing possible harm, distress or a safeguarding concern is escalated the same day under section 11, whatever else is in the queue.
- Direct messages from an account that appears to belong to someone under 18 are handled with particular care: no private, ongoing conversation; a short, warm reply directing them to a parent, teacher, chaplain or the safeguarding contact, never a personal number.
- Posts inviting vocation enquiries always carry the official contact route (section 8.5), never a personal number or handle.
- Nothing is posted that pressures, rushes or targets an individual by name without their consent.

8.2 Group chats connected with our ministry (for example the Living Flame WhatsApp group)

- At least two leaders are administrators of any such group, as the Young Adult Ministry Safeguarding Policy requires for in-person events.
- The group's purpose (reminders, event information, community) is stated when someone joins, and members know who the administrators are.
- Personal phone numbers are not shared beyond what the group's platform itself discloses; a member who wants to leave can do so without being asked why.
- Administrators do not use the group for private, one-to-one pastoral conversation; see section 7.

8.3 One-to-one messaging and email

- Used for practical, time-bound matters: confirming a date, answering a factual question, following up after an event.

- A conversation that turns pastoral, emotional or vocational moves to an in-person or phone setting under section 9 of the Young Adult Ministry Safeguarding Policy; the leader says so plainly rather than continuing at length by text.
- Messages with anyone under 18 are copied to, or conducted via, a parent or the Young Adult Ministry Coordinator.

8.4 Livestreams and video calls

- Run on official, ministry-controlled accounts, never a leader's personal account.
- At least two leaders present, with a waiting room or equivalent enabled where the platform allows it.
- Recordings are made only with notice given in advance, and are stored and deleted under section 10.

8.5 The vocations enquiry route

- Enquiries always go through the published form, which sends a copy to the enquirer and sets Reply-To to the enquirer's own address, so a director's reply goes straight back to them, not through an intermediary.
- No enquiry is ever redirected to a leader's personal number or account instead of the published route.
- The data protection terms in section 10 apply in full, including the retention window set out there.

9. Communicating our safeguarding commitment online

CSSA Standard 2 requires that we proactively communicate our safeguarding message, and that we own it rather than treat it as small print. We do this as follows.

- A link to the Province's safeguarding statement and how to report a concern is included in the bio or link-in-bio page of every official social media account, alongside the Living Flame and vocation links already planned there.
- Any public-facing vocations enquiry page carries, at the top, a short standing line that these are real people who will read what is sent, and that an enquiry commits the sender to nothing, with a link to how concerns are reported.
- New administrators and contributors are told, as part of their briefing under section 6, where our safeguarding statement sits online and how a concern reaches the House Safeguarding Lead.
- This policy, and a summary of it in plain language, is published on the Province's safeguarding pages alongside the Young Adult Ministry Safeguarding Policy.
- The House Safeguarding Lead and the Young Adult Ministry Safeguarding Representative review, at the same twice-yearly point as section 5, whether these online safeguarding messages are easy to find and current, and record the review.

This communication plan is reviewed whenever a new official channel is opened, and otherwise on the same annual cycle as section 12.

10. Images, content and data protection

Images and personal testimony

- Anyone named, pictured or quoted in our content (a brother's testimony, a photo from an event, a quote in a post) signs off the final text or image themselves before it is published.
- Consent is sought before any photograph is taken at an event, with a visible way to opt out, following section 10 of the Young Adult Ministry Safeguarding Policy.
- At the Kensington Priory, no photograph or video taken for any official channel may include a nursery child or the nursery's areas; anyone filming or photographing on site checks this before shooting, and takes particular care during the nursery's hours on school days.
- No images of anyone under 18 are published without written parental consent, and never alongside their full name or school.
- A contributor may ask for content to be removed or amended after publication; the request is honoured within a reasonable time and without requiring a reason.

Personal data collected online

- Registration, contact and enquiry data (comments, form submissions, group chat membership, the vocations contact form) is collected only as needed for the purpose stated at the point of collection.
- Enquiry data collected through any digital contact form is retained no longer than needed for rate-limiting and delivery troubleshooting, on a configurable retention window defaulting to 90 days, after which it is deleted automatically.
- None of this data is added to a mailing list or used for any purpose beyond passing on the enquiry and sending the confirmation, unless the person separately agrees.
- A short, plain notice at the point of collection states what is collected, who it is sent to, that it is not added to a mailing list, and how long it is kept, with a link to the Province's privacy notice.
- The wording of any such notice, and its retention period, is signed off by whoever handles data protection for the Province before it goes live.
- Safeguarding records arising from an online concern are kept separately, by the Provincial Safeguarding Lead, under the Province's retention schedule, not alongside ordinary enquiry data.

11. Responding to concerns raised online

Any concern arising online — a disclosure in a direct message, a worrying comment, a report about another leader's online conduct — goes to the House Safeguarding Lead or the Young Adult Ministry Safeguarding Representative the same day, exactly as section 11 of the Young Adult Ministry Safeguarding Policy requires for anything arising in person. If someone is in immediate danger, call 999 first.

11.1 When a disclosure arrives by message

- Reply with care, and do not investigate, question in detail or confront anyone by message. A screen is not the place to probe further.

- Do not promise confidentiality; explain gently, if it is natural to do so, that you may need to share what they have said with the safeguarding lead so they can be kept safe.
- Keep the original message; do not delete, edit or forward it informally. Screenshot or save it securely and pass it, with the sender's details, to the safeguarding lead the same day.
- If the conversation can move to a phone call without distressing the person further, a calmer, fuller conversation is often more use to them than more text.

11.2 Online harassment, abuse or targeting of a leader or participant

- Rate-limiting and other abuse protections (honeypot fields, validated email addresses) are built into any form that sends mail to a named individual, precisely so that leaders and vocations directors are not exposed to harassment through our own channels.
- A pattern of unwanted contact from the same person, after being asked to stop, is reported to the House Safeguarding Lead and, where it amounts to harassment, may be reported to the platform and to the police.

11.3 Concerns about a friar, leader or administrator's online conduct

- These bypass the immediate team and go straight to the Provincial Safeguarding Lead, as section 11.2 of the Young Adult Ministry Safeguarding Policy requires for any concern about a friar or leader.
- Access to the channel in question may be suspended while the matter is looked into, without any presumption of guilt, following the Province's existing procedures for managing and supporting a respondent (Standard 5).
- Anyone may also report directly to the police, the relevant local authority, or the CSSA.

11.4 Support

Support for anyone harmed through an online channel, and for anyone who raises a concern, follows the same commitments set out in sections 9 and 11.3 of the Young Adult Ministry Safeguarding Policy. No one who raises a concern in good faith will suffer any detriment.

12. Training, review and quality assurance

12.1 Training

- Every channel administrator and leader completes basic safeguarding training before taking up the role, and this policy and its code of conduct specifically, as part of induction under section 6.
- Training is refreshed annually, and whenever this policy is updated, a change in platform or law requires it, or a concern under section 11 reveals a gap in practice.
- Training is recorded, with dates and attendance, by the House Safeguarding Lead, alongside the training records already kept for in-person ministry roles.

12.2 Monitoring and review

- This policy is reviewed every year by the Young Adult Ministry Coordinator with the House Safeguarding Lead and the Provincial Safeguarding Lead, and after any serious incident, a change in Church or statutory guidance, or a change of platform.

- The House Safeguarding Lead and Young Adult Ministry Safeguarding Representative evaluate the effectiveness of our online safeguarding communications (section 9) using the same evidence as in-person communications: feedback from those who engage with our channels, website and page traffic, and any pattern in concerns raised under section 11.
- Findings, and any resulting changes to this policy or to practice, are recorded in the annual report to Trustees alongside in-person safeguarding activity.
- Lessons from any concern or incident involving an online channel are drawn out and fed back into training, following the same process as for an in-person disclosure.

13. Contacts and appendices to prepare

13.1 Contacts

The Province's published UK safeguarding contacts apply to online concerns exactly as to any other (see the Young Adult Ministry Safeguarding Policy, section 13.3). Confirm these are current, and add the House Safeguarding Lead's and Young Adult Ministry Safeguarding Representative's preferred contact method for an online concern specifically (for example, a dedicated email address separate from any public inbox).

13.2 Appendices to prepare

- ☐ A: Channel administrator sign-off form (code of conduct, section 7)
- ☐ B: List of current official channels and their administrators (section 5)
- ☐ C: Contributor consent and sign-off form for testimonies, quotes and images (section 10)
- ☐ D: Data protection notice for online forms and group chats, for sign-off by the Province's data protection lead (section 10)
- ☐ E: Online safeguarding concern record form (section 11)
- ☐ F: Short, plain-language public summary of this policy for publication alongside the Young Adult Ministry Safeguarding Policy (section 9)

14. Mapping to the CSSA National Safeguarding Standards

This table shows where each of the eight standards, and their criteria, is answered in this policy.

Standard	Criteria	Where answered here
1. Leadership, Governance, Ministry and Culture	LGC1 Leadership; LGC2 Governance; LGC3 Ministry and Culture	Section 1 (policy statement and zero-tolerance commitment); Section 5 (roles, oversight, named leads); Section 6 (governance of who may run a channel)
2. Communicating the Safeguarding Message	CSM1 Communication plan; CSM2 Leadership engagement and ownership	Section 9 in full

Standard	Criteria	Where answered here
3. Engaging With and Caring for Those Who Report Harm	EC1 Compassionate response and access to support; EC2 Leadership engagement	Section 11.1 and 11.4; underpinned by Young Adult Ministry Safeguarding Policy sections 9 and 11.3
4. Effective Management of Allegations and Concerns	EF1 Clear, accessible, reviewed reporting processes	Section 11 in full, especially 11.3; reporting route cross-referenced to Young Adult Ministry Safeguarding Policy section 11
5. Management and Support of Respondents	SMR1 Management; SMR2 Support	Section 11.3 (suspension of channel access without presumption of guilt, referred into the Province's existing respondent-support procedures); full process remains in the Province's safeguarding policy
6. Robust Human Resource Management	HRM1 Safer recruitment; HRM2 HR management and support	Section 6 in full (safer recruitment applied to channel administrators); Section 5 (no channel run by one person alone)
7. Training and Support	TS1 Training; TS2 Leadership oversight of training	Section 12.1 in full
8. Quality Assurance and Continuous Improvement	QA1 Quality assurance; QA2 Continuous improvement	Section 12.2 in full; this policy itself, reviewed annually

A full audit response for each standard's detailed questions (as in the Carmelite Priory Kensington SEF) should cite this policy, together with the evidence named in section 13.2, as the online and private-communication evidence for Standards 1, 2, 4, 6 and 7 in particular, and as supporting evidence for Standards 3, 5 and 8 alongside the Province's wider safeguarding documentation.

15. Approval

Approved by the Provincial of the Anglo-Irish Province:

Fr. Jim Noonan OCD

Fr. Jim Noonan, OCD

Date: 19 October, 2026

Next review: 19 October, 2027

Sources

- Young Adult Ministry Safeguarding Policy, Discalced Carmelite Friars, Anglo-Irish Province (19 October 2026)
- Self-assessment for Baseline Audits, Level 2 Religious Life Groups: The Carmelite Priory, Kensington (working draft, 19 October 2026)
- National Safeguarding Standards, Catholic Safeguarding Standards Agency