



A Blessing to Cuckfield

The Parochial Church Council of Holy Trinity Cuckfield
UK Registered Charity No. 1131432

Holy Trinity Church Cuckfield PCC Social Media Policy

This policy is designed to ensure compliance with the particular and relevant aspects of the Online Safety Act 2025 as they apply in a parish context and to underwrite compliance with UK General Data Protection Regulation (UK GDPR); the Data Protection Act 2018; the Privacy and Electronic Communications Regulations (PECR); the Data (Use and Access) Act 2025; safeguarding obligations; applicable Church of England guidance; charity law obligations;.

Adopted by: The Parochial Church Council ('the PCC') of Holy Trinity Church Cuckfield
Version: June 2026
Review date: Annual review, earlier if legislation, Diocesan, ICO, or Charity Commission guidance changes
Policy owner: PCC/PCC Secretary

1. Purpose of this Policy

The PCC recognises that social media and messaging platforms can support communication, ministry, pastoral connection, evangelism, volunteering, safeguarding awareness, and community life.

This policy exists to ensure that all online communication connected with the parish reflects Christian values of respect, integrity, care, and truthfulness; complies with safeguarding, confidentiality, copyright, and data protection requirements; protects children and vulnerable adults; maintains healthy professional and pastoral boundaries; protects the reputation of the parish, clergy, staff, volunteers, and wider Church.

2. Scope of Policy

This policy applies to clergy, PCC members, employees, volunteers, ministry leaders, church officers, and anyone acting on behalf of the parish.

It applies to official church social media accounts, WhatsApp and instant messaging groups, personal social media use where an individual is identifiable as connected with the parish, use on both church-owned and personal devices.

3. Platforms Covered

This policy includes, but is not limited to Facebook, Instagram, X/Twitter, YouTube, TikTok, LinkedIn, WhatsApp, Signal, Messenger, Threads, Telegram, email lists and groups, websites, blogs, forums, livestreams and future digital communication platforms.

4. Core Principles

All online communication connected with the parish must be respectful, truthful, and appropriate, maintain proper professional and pastoral boundaries, avoid bullying, harassment, discrimination, or intimidation, protect confidential information, comply with safeguarding requirements, comply with GDPR and data protection law, avoid bringing the parish or wider Church into disrepute.

5. Official Parish Accounts

Official parish accounts may only be created or operated with the approval of Standing Committee.

All official accounts must have at least two administrators, the authorised owner and a Safeguarding Coordinator who must be given access; must use secure passwords, use parish-controlled contact details where possible; be recoverable if an administrator or user leaves their role; and be managed in accordance with safeguarding and GDPR requirements.

Only authorised persons (incumbent, or incumbent and churchwardens acting together) may post official statements on behalf of the parish; and individual's personal opinions must not be presented as official parish positions without prior authorisation by them.

6. Content Standards

Content published on official parish platforms must be accurate and lawful; respect copyright and image permissions; be suitable for a public audience; avoid defamatory or inflammatory material; avoid party-political endorsement; reflect Christian values and the mission of the parish.

Photographs or videos of children or vulnerable adults must only be used where appropriate consent has been obtained; and children should not normally be identified by full name.

7. Safeguarding

Safeguarding responsibilities apply online exactly as they do offline.

Church representatives must not engage in private one-to-one messaging with children or young people in connection with church activities; must not use WhatsApp or social media to discuss safeguarding concerns, share confidential safeguarding information online or use disappearing-message functions for church or safeguarding communications.

Any safeguarding concern arising online must be reported immediately to the Parish Safeguarding Officer.

Where communication with young people is necessary, it must be transparent, group-based wherever possible, and supervised by at least two unrelated adults, and authorised by parents or guardians.

Groups involving under-18s must be used only for logistical communication, not pastoral counselling or sensitive conversations.

8. WhatsApp and Instant Messaging

- i. **Authorised WhatsApp Groups:** official church WhatsApp or messaging groups must have a clear purpose, must have at least two administrators, and an identified Safeguarding Coordinator who must be given access; and should include only those who genuinely need access.

Individuals must consent before being added to a group because their phone number will be visible to other members.

The authorised group administrators are responsible for ensuring appropriate conduct, removing inappropriate content, periodically reviewing membership, and closing groups that are no longer required.

- ii. **Unofficial Groups:**

The parish is not responsible for privately created groups that are not authorised parish groups, even if church matters are discussed within them. Individuals may leave such groups at any time.

9. Conduct Expectations

Users must not share confidential information; post offensive or discriminatory material; circulate rumours or complaints; share screenshots or PCC documents or other church documents without consent; share images of children without permission; discuss safeguarding matters in group chats.

Messages should normally only be sent between 8:00 am and 8:00 pm except in emergencies or urgent pastoral/prayer situations.

10. Personal Social Media Use

The parish respects the right of individuals to use personal social media accounts. However, where someone is publicly identifiable as connected with the parish, they must take care that their conduct does not: damage the reputation of the parish; undermine safeguarding standards; breach confidentiality; appear coercive, abusive, or discriminatory.

Individuals expressing personal opinions should make clear that those views are their own by use of the following suggested wording: 'views expressed are my own and do not necessarily reflect those of Holy Trinity Church Cuckfield'. Clergy, PCC officers, and other parish leaders should exercise particular care because their public statements may reasonably be associated with the parish.

11. Privacy, Confidentiality and Data Protection

Confidential information must never be shared on social media or messaging platforms.

This includes safeguarding information; pastoral disclosures; personal contact details; internal parish or PCC discussions; employment matters; complaints or disciplinary matters.

Remember Church-related messages may constitute parish records and may be disclosable under data protection law. Screenshots or copied messages must not be shared externally without appropriate consent or lawful justification.

12. Complaints, Abuse and Online Conflict

Negative or abusive comments should not normally be engaged with personally.

Where appropriate comments may be hidden or deleted; users may be blocked; incidents should be escalated to parish leadership. Anyone experiencing online abuse connected with parish activity should report it promptly so that support can be provided.

Potential reputational, legal, or safeguarding incidents must be escalated immediately to the incumbent, Churchwardens, or Parish Safeguarding Officer.

13. Monitoring

The parish will not undertake routine surveillance of personal social media accounts.

However, publicly available information may be reviewed where there is a safeguarding concern; an allegation of misconduct; a reputational issue; or potential unlawful activity.

Any review will be proportionate and carried out in accordance with data protection law and Church guidance.

14. Breaches

Breaches of this policy may result in removal of administrative privileges; safeguarding action; disciplinary action; referral to statutory authorities where appropriate.

Nothing in this policy prevents any individual from reporting unlawful conduct, safeguarding concerns, discrimination, or abuse through appropriate whistleblowing or legal channels.

15. Related Policies

This policy should be read alongside the PCC's Safeguarding, Bullying & Harassment, and GDPR/Data Protection Policies in particular.

16. 14. Review

This policy shall be reviewed annually, or sooner if safeguarding guidance changes, legislation changes, or significant new technologies/platforms emerge.