

## CLERGY SOCIAL MEDIA POLICY

Policy Approver(s)	The Bishop of Exeter and their Senior Team
Policy Owner(s)	Diocesan Director of Communications and Engagement
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Related Documents	Diocese of Exeter: Clergy Anti-Bullying and Harassment Policy Diocese of Exeter: Clergy Grievance Procedure
Scope	This Policy applies to all persons beneficed, licensed or otherwise authorised by the Bishop for ministry in the Diocese of Exeter. This includes all clergy holding office under Common Tenure, Qualified Common Tenure and Freehold and applies equally to a Cathedral Clergy, Archdeacons and Bishops.  The Diocese of Exeter reserves the right to amend this policy at its discretion at any time.
Extensions	Individuals identified in Paragraph 2.
Exclusions	Individuals identified in Paragraph 2.

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## 1. Policy Statement

The Diocese of Exeter and the Church of England embraces the use of social media in ministry, acknowledging its value as an important tool in mission. Social media operates as a public forum and communication is immediate, interactive, conversational and open-ended, which sets it apart from other forms of communication. The many and varied social media channels provide unique opportunities for office holders and their parish church(es) to share their faith and good news about the work their church is doing in their local area, allowing them to connect with people where they are and build relationships with those they might otherwise struggle to reach.

However, as well as the many opportunities social media provides, office holders should also be aware of (though not put off by) the associated risks. Participation with online social media should be no different to the standards expected when participating in any other public forum. When used poorly or without careful thought, social media can pose risks to confidential information, as well as the reputation of the office holder, their colleagues and parish and the wider diocese. It can also jeopardise both the office holder and the diocese's compliance with legal obligations.

The policy applies to the use of social media by the office holder for the purposes of executing the duties of the office held and also personal use that may affect the reputation of the office holder, their colleagues, PCC members, PCC employees, parish volunteers, members of their congregation and members of the wider parish community, as well as the reputation of the Diocese of Exeter. This is especially important because, unlike an individual working in a secular role with a clear distinction between their work life and their private life, there is no such clear distinction for office holders in the minds of the public.

Office holders are encouraged to discuss any concerns regarding their use of social media with the Diocesan Director of Communications and Engagement and their Archdeacon as appropriate.

In the event that this policy and the law conflict, the law shall take precedence. If office holders are in any doubt as to what their rights are, they are to discuss matters with their incumbent, Rural Dean, Archdeacon or Bishop as appropriate. If this policy changes as a result of amendments in the law, the changes will be notified to the office holder through the appropriate channel, such as the Bishop's Office, the Diocesan People Services Team, the Church of England National Team, or the Diocesan Communications and Engagement Team amongst others.

## 2. Who is Covered by the Policy?

This policy applies to all individuals who are beneficed, licensed or otherwise authorised by the Bishop for ministry in the diocese. This includes all office holders (stipendiary and non-stipendiary) under Common Tenure, Qualified Tenure and Freehold and it applies equally to Cathedral office holders, Archdeacons and Bishops.

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Employees of the Exeter Diocesan Board of Finance, the Cathedral and National Church Institutions should refer to their own employee handbook or policy document on the use of social media during the course of their employment.

All clergy employed by the Exeter Diocesan Board of Finance (EDBF) are subject to the EDBF Social Media Policy. This policy and the EDBF policy are closely aligned and aim to uphold the same standards of professional conduct for all clergy whether employed or holding office across the diocese.

### 3. Scope of the Policy

This policy is designed to ensure all office holders communicate within the law and in a way that is consistent with their Christian values and those of the diocese. This policy deals with the use of all forms of social media and communications in a digital public space; including but not limited to: Facebook, Instagram, YouTube, LinkedIn, Twitter/X, TikTok, Wikipedia and all other social networking sites. We would also hope that within closed networks such as WhatsApp clergy would also conduct themselves appropriately. This policy covers, but is not limited to, internet posts, blogs, articles, forum comments, vlogs, podcasts, livestreams and video recordings. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.

Further to this, the difference between an office holder's personal opinion and the position of the Church of England is often not clear in the public mind, and office holders should be mindful of this when using social media.

The use of social media does not change the Diocese of Exeter's understanding or upholding of confidentiality, responsibility, good manners and Christian witness. As such, the following areas relating to social media use should be noted:

**Public Domain:** The law views anything shared online as being in the public domain. Sharing thoughts and reflections with friends using social media or email might feel personal and private; but if more than one person can access what has been written, it is highly likely that the law would class it as "published". It is subject to the laws touching libel, defamation, copyright, freedom of information and data protection. If an office holder wouldn't say something in a local newspaper, they shouldn't say it online.

**Permanence:** Anything said online can be assumed to be permanent. Even if a comment made on a website is deleted, it could still have been seen by other people, re-published, or had a screenshot taken. It is easy to say something in the heat of the moment that is later regretted, but it could remain permanently online for all to see.

**Security:** It is absolutely not safe to assume anything electronic is secure. Privacy settings on social media tools might intend for comments to only be shared with accepted "friends" or "followers" but there is no guarantee that they will not pass (repost) them outside trusted circles.

**Gossip:** Social media can pose a risk to confidentiality and be intrusive. Social media does not change the diocese's fundamental understanding about confidentiality in the life of the

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Church. When telling a story about a situation which involves someone else, it is always useful to pose the question "Is this MY story to tell?" Furthermore, an office holder should ask if the story is likely to cause distress, inconvenience, upset or embarrassment to others if they discover it has been shared in this way. If in any doubt at all, it should not be shared online.

**Representatives:** As office holders, anything done or said in the public domain can be interpreted by the public as representative of attitudes and behaviour in the diocese and the Church of England as a whole. Office holders should be aware that some journalists keep an eye on social media hoping to spot a good church-related story, but controversial, hasty or insensitive comments can attract media attention and be widely shared by individuals. All office holders are responsible for their own online activities, but in the process of posting negative or critical opinions and comments on social media about (for example) a Diocesan initiative, a fellow church leader or the Church of England will only serve to make people outside the Church think badly of the whole institution. Constructive criticism or feedback is best shared privately.

**Separation:** Office holders should keep a clear separation between personal and corporate church accounts. A private account should be clearly marked as such, explicitly stating somewhere prominently the account is purely an expression of "my own views" so there is no suggestion their opinion represents their parish church(es) or the diocese. It would also be sensible, for office holders when using a personal account to consider not posting pictures of themselves in their dog collar or other ecclesiastical attire. If an office holder posts from an account representing their parish church(es) or a church-related organisation, then they must be sure to avoid expressing personal opinions. Any account which carries the logo, address or website of a church or church-related organisation should be seen as a corporate account and an office holder should only speak for that organisation.

**Recommendations:** Office holders should take care with external links. When linking to material, check out the website being linked; is its overall focus and content such that the office holder is happy to publicise and promote it? Many innocuous opinions can be included as part of a broader stream of more extremist material the office-holder may not want to link themselves to.

**Real-time Relationships:** Interactions in the virtual world need to be transparent. Healthy boundaries and practices must be adhered to just as they should be in the physical world. In the virtual world, "friend" or "follower" can mean anyone with whom an individual is willing to communicate through that medium. In the physical world, friend can mean much more in terms of intimacy, self-disclosure, mutuality and expectations for relationship.

In all cases, office holders have a right to free speech, restrained only by the law, the doctrine of the Church of England and the requirement that they may not be members or supporters of any organisation declared by the General Synod to be incompatible with Christian beliefs (currently, the British National Party and National Front are in this category). Office holders frequently give their views on all sorts of issues, from the pulpit, in school assemblies, on civic occasions, and in ordinary everyday interactions in person and

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online. However if such views are badly or insensitively expressed, or if they could be viewed as being of a bullying or harassing nature, under Canon Law they could be construed as ‘conduct unbecoming of a clerk in holy orders’ and result in disciplinary action being taken.

Therefore a breach of this policy resulting from poor judgement or a lack of competence may result in a capability procedure being followed. For more serious or deliberate breaches this may result in a Clergy Disciplinary Measure which could lead to an office holder having their duties suspended or curtailed or their removal from office. Any office holder suspected of committing a breach of this policy will be required to co-operate with any investigation.

An office holder may be required by their Archdeacon, to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action being taken.

#### **4. Responsibility For Implementing the Policy**

The Bishop of Exeter and their Senior Team have overall responsibility for the effective operation of this policy. Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with individual office holders, the Archdeacons, Suffragan Bishops, and the Diocesan Director of Communications and Engagement.

All office holders have a specific responsibility for operating within the boundaries of this policy, ensuring that all relevant individuals who assist them with the execution of the duties of their office understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

In all cases it is the responsibility of individual office holders to identify whether their social media skills and understanding are at the requisite level for their role. Any such training needs should be clearly identified during their Ministerial Development Reviews and outlined in their Continual Ministerial Development plans.

The Diocesan Communications and Engagement Team will provide opportunities for office holders to undertake social media communications training, as well as offering support and advice to help them maximise the benefit of their social media use in their parish. Office holders who make use of social media are expected to keep up to date with best practice guidance which the diocese or the national Church of England may publish.

#### **5. Compliance With Related Guidelines, Policies and Statutory Legislation**

Social media must never be used in a way that breaches [Guidelines for the Professional Conduct of the Clergy](#), the [Five Guiding Principles](#), the Clergy Handbook or any other clergy policies such as the Anti-Bullying and Harassment Policy or the statutory requirements of any law applicable to office holders such as the Equality Act 2010 and any data protection legislation.

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If an internet post would breach any of the above guidelines or Clergy policies in another forum, it will also be considered to breach them in an online forum. For example, office holders must not use social media to:

- Breach their or the diocese's obligations with respect to the rules of relevant regulatory bodies.
- Breach any obligations they or the diocese may have relating to confidentiality.
- Breach the Code of Practice relating to Grievance procedures or Clergy Disciplinary Measures.
- Breach the Diocesan Data protection policy (for example, never disclose personal information about a fellow office holder or parochial colleague online).
- Breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as by claiming to be someone other than themselves or by making misleading statements).
- Harass or bully other office holders, EDBF employees, parochial officers, parish volunteers, PCC employees, parish volunteers, members of the congregation or members of the wider parish, or third parties, or in any way be in breach of the Diocese of Exeter Prevention of Bullying and Harassment Policy.
- Unlawfully discriminate against other office holders, EDBF employees, parochial officers, parish volunteers, PCC employees, parish volunteers, members of the congregation or members of the wider parish or third parties in breach of the Diocese of Exeter Equal opportunities policy as stated in the Clergy Handbook.

If an office holder breaches any of the above policies they might be subject to a disciplinary process and the taking of appropriate action up to and including removal from office.

### ***Social Media Use and Safeguarding***

Laws regarding the mandated reporting of suspected abuse, neglect, exploitation of children, youth, elders and vulnerable adults apply in the digital public forums as much as they do in the physical world.

Very clear boundaries must be maintained when communicating with vulnerable adults, children and young people. The law and Diocesan policies on Safeguarding apply in communications with vulnerable adults, children and young people by whatever means, and Safeguarding guidelines apply fully online. If you are in any doubt, always report a matter to the Diocesan Safeguarding Team, who are best placed to make a judgment as to whether an incident meets the threshold.

Any communications with vulnerable adults and young people should only be in public forums and in the view of whole groups, not individuals. Private messages should not be exchanged with vulnerable adults or young people via any form of social media.

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## 6. Responsible Use of Social Media

The following sections of the policy provide office holders with common-sense guidelines and recommendations for using social media responsibly and safely.

### **Protecting the Reputation of the Office, the Office Holder and the Diocese, and Maintaining Political Balance**

Protecting the integrity of the office held and the Church of England's image is a core Diocesan value and any office holder who uses social media in such a way that has the potential to bring their office and the diocese into disrepute may be subject to disciplinary proceedings up to and including removal from office.

An office holder must not post disparaging or defamatory statements about:

- The diocese including the EDBF.
- The Mission Communities, parishes, and individual churches of the diocese.
- The other office holders, laity, parochial officers, and volunteers of the diocese.
- EDBF and parish employees.
- Members of the parish congregations or members of the wider parish community.
- Other denominations, their ministers, employees, volunteers or congregational members.
- Other partner agencies, bodies and external stakeholders.

Office holders are to avoid social media communications that might be misconstrued in a way that could damage their reputation and the reputation of the office, even indirectly.

Office holders are also to avoid social media communications which could imply that their views are the official views of the EDBF, Diocese of Exeter, or Church of England. This is particularly important in a political context and even more so in the six weeks period before an election. An office holder is entitled to their views but it is important for the diocese and the Church of England not to be seen to be backing a particular political party or view. This is a complex area and the relevant Archdeacon or Diocesan Director of Communications and Engagement will be happy to discuss this with anyone who has questions.

### **Personal Use of Social Media**

An office holder is, at all times, responsible for the content of their social media postings, for upholding the reputation of their office, and the reputation of the Church of England in the diocese. This includes the impact such postings may have on the ability of other office holders to exercise the duties of the office they hold or the EDBF's ability to conduct its business. The diocese advises all office holders to be circumspect in any social media posting, and if in doubt not to post or publish.

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The diocese asks all office holders to be aware of the effect of circulating or posting commercial, personal, or political solicitations, or promoting outside organisations unrelated to the diocese and its activities on the office holder's reputation as well as the reputation of fellow office holders, parochial colleagues and the diocese.

Office holders should make it clear in social media postings, or on their personal profile, that they are speaking on their own behalf. They should write in the first person and use a personal email address.

Office holders should be careful of posting photographs and be aware of what photos they appear in which others may post (either with their knowledge or without).

An office holder should remember that what they publish will be available to be read by the general public for a long time.

If an office holder discloses their affiliation with the EDBF on their profile or in any social media postings, they must state that their views do not represent those of the EDBF. An office holder should ensure their profile and any content posted are consistent with the responsibilities and authority of the office held.

An office holder should never post comments about sensitive business-related topics, such as the performance of EDBF employees.

If any office holder sees content on social media that disparages or reflects poorly on any office holder, or the diocese including the EDBF they should inform the Diocesan Director of Communications and Engagement and their Archdeacon if appropriate. All office holders are responsible for protecting the reputation of fellow office holders and all those involved in the activities of the Church of England in Devon.

### **Respecting Intellectual Property and Confidential Information**

An office holder must not do anything to jeopardise Diocesan confidential information through the use of social media.

In addition, office holders must avoid misappropriating or infringing the intellectual property of other companies and individuals, which can create liability for them as individuals and for the diocese.

Office holders should not use EDBF or other companies' logos, slogans or other trademarks, or post any confidential or proprietary EDBF information without prior written permission.

### **Giving Personal References/Endorsements on Social Media**

When an office holder writes a personal reference/endorsement on social media, that reference/endorsement would be considered to be in the public domain, unlike a letter of reference which can only be seen by those to whom it is addressed, or an endorsement given during a privately held conversation. When an office holder is asked to provide a personal professional reference/endorsement for a fellow office holder, parochial colleague or member of their congregation on a social media site such as, but not limited to, LinkedIn,

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which refers to their ecclesiastical or pastoral relationship/experience, the office holder should consider whether the giving of such a reference/endorsement would impact their ability to carry out fairly the duties of their office and whether giving such a reference/endorsement may be viewed as showing favouritism or preferential treatment to a particular individual.

The office holder should also consider whether providing the reference/endorsement would be viewed by others to be representing the view of the PCC, congregation or wider parish where the office is held. It may in some circumstances be prudent for the office holder to obtain the approval of the PCC or Archdeacon to publicly endorse a fellow office holder, parochial colleague or member of the congregation.

Similar consideration should be given when an office holder publicly endorses a business, service provider or a charity on social media, especially if they have any family or financial connection (whether formal or informal) to the business, service provider or charity.

When an office holder is asked to provide a personal reference/endorsement for someone entirely unrelated to the duties of their office and unknown to their parochial colleagues or members of the congregation, then they should consider how their reference/endorsement might be viewed by the local parish community and by those outside the parish and whether it could cause any difficulties for the office holder in the carrying out of their duties or those of their parochial colleagues. If in doubt the office holder should err on the side of caution and seek further guidance if necessary from the PCC or Archdeacon.

When an office holder chooses to write a public reference/endorsement on social media they should make clear the reference/endorsement is being given in a purely personal capacity rather than in their official capacity as an office holder thereby making it clear they are not representing the views or opinions of their parish or diocese. An office holder may also wish to add a disclaimer such as, "This reference/endorsement is given in good faith but without any liability on behalf of the writer or the Diocese of Exeter".

### **Use of Online Meeting Facilities**

Clergy are advised to show due care in their use of online conference platforms and to ensure that they are aware of and use the privacy functions. National Church provides this guidance for the safe use of such on-line meetings.

If a meeting is compromised with malicious and distressing content, office holders are to ensure that the incident is reported to the police and to the Diocesan Safeguarding Team.

See here more information on Communications and Engagement in the diocese and the Clergy Social Media Policy. In addition the Church of England has published social media advice aimed at tackling offensive behaviour and misleading content so as to encourage a positive atmosphere for online conversations.

<https://www.churchofengland.org/help/social-media-guidelines> .