



LCiGB Communications Policy

“In the beginning was the Word...” (John. 1:1)

The LCiGB Communications Policy provides formal guidance and the official rules for communicating in of the LCiGB. This document should be read in conjunction with “The LCiGB Communications Strategy”, a separate document that sets out the goals in the area of communications, is set within the context of the church and lays out a plan for achieving those goals.

1. Introduction

Communication is the foundation of all relationships. While communication seems a matter of fact, like breathing, we often take it for granted, and this may be the reason why some communication goes wrong.

Poor communication can cause serious problems for individuals and for organisations, including congregations. If it breaches certain laws, it can result in litigation, e.g. for defamation or slander. Organisations are, therefore, encouraged to develop and implement communication policies and procedures. Where there is a lack of good formal communication, harmful informal communication often results with negative impact on individuals and on organisations.

A communications policy aims to encourage positive informal and formal communication and to minimise harmful communication. It also provides the means and tools to ensure good communication and limit occurrences of poor or bad communication. Communication policies include procedures to reprimand individuals who breach policy and engage in detrimental communication.

Where breaches of the policy occur, especially those that cross legal boundaries, both individuals and organisations may be liable to litigation and may suffer negative reputational impact, particularly if such events end up in the public domain. Because opinions differ about what constitutes communication that crosses boundaries, clarity about what is acceptable and not acceptable is essential to avoid confusion. Establishing basic ground rules is thus not only advisable but also necessary.

The Lutheran Church in Great Britain (LCiGB) already has (in its rules) some guidance specific to particular roles. For example, Trustees are to avoid undertaking activities that might place the charity’s endowment, funds, assets or reputation at undue risk; and the duties of pastors include “refraining from any action or comments that could bring the LCiGB into disrepute.” However, it is important to give further guidance, particularly as the LCiGB widens the scope of its communication and as new developments occur, e.g. in the areas of electronic communications, e-bulletins, social media (Facebook, Twitter, Blogs), web sites, etc. Developing a communications strategy, policy and procedure is necessary to promote and ensure excellent communication across the LCiGB.

The LCiGB faces a number of challenges when it considers how best to communicate. Many of the LCiGB’s congregations are geographically distant from one another and they vary in



size and membership. Some congregations comprise, or include different national language groups, e.g. Chinese, Polish, Swahili, Scandinavian. The disparate and multi-cultural nature of the LCiGB means that establishing the means to ensure good communication is both important and problematic. The LCiGB is committed to facing this challenge to enable more and better linkages that are beneficial for sharing the Word of God internally and externally. Seeking ways to increase and improve communication in the LCiGB will support the members and the mission of the Church.

2. Context and Scope

As Christians and Lutherans, we are called upon to love our neighbours as ourselves, and to treat people as we wish to be treated. In this context, communication needs to be exemplary and never vindictive or abusive.

The LCiGB must protect its reputation and ensure that incorrect messages do not accidentally or deliberately misrepresent the church.

The context of this policy is corporate and organisational, i.e. it addresses corporate and organisational responsibility and accountability. This applies whether any item of communication is official and formally approved, or individual, if it may be construed as representing (or related to) the LCiGB. If an individual takes responsibility for communicating in the context of the LCiGB, then s/he bears responsibility for the communication under the scope of this policy.

3. Forms of communication

Communication permeates everything we do, and there are many forms and types, including but not limited to:

- verbal, e.g. face-to-face conversations, discussions, telephone, voice-mail or answering machine, etc.
- non-verbal, e.g. facial expressions, body language, signing (deaf), tone of speaker
- written or printed, e.g. emails, letters, electronic blogs, social media comment, etc., as well as documents, reports, photos, videos, etc.

In the church, communication occurs in a wide range of contexts, e.g. discussions, presentations, letters, emails, documents, social media, web sites, worship services, social events, teaching and training (e.g. Bible study, Sunday School), meetings, conferences, retreats, small group gatherings, and many others.

In all contexts, and in all forms, communication in the church should embrace the highest standards, in line with our Christian beliefs, which embrace love and kindness towards one another.

Communications also includes information sharing, and there are clear principles for the effectiveness of providing information.



3.1 Internal direct person to person communication, within the membership of the LCiGB, whether verbal or written, should be

1. inclusive and appropriate for the audience, e.g. the hearing impaired or the blind;
2. culturally aware, e.g. taking account of the variety of cultural and linguistic backgrounds in the LCiGB, and the potential for misunderstandings, ensuring clarification is sought for anything that is not understood or is unclear;
3. non-discriminatory, e.g. towards minorities, or expressing gender bias;
4. accurate and factual, reflecting the purpose;
5. timely and responsive to needs, e.g. as when meeting deadlines, keeping information up to date, etc.;
6. sensitive and kind whilst truthful and honest, i.e. avoiding inflammatory remarks, insults, ridicule, bullying or threatening tone, obscenities, or hate-speak.

3.2 External communication, i.e. communicating with non-members of the church, includes all of the above principles, but noting especially the following:

7. unofficial comments made by LCiGB staff and clergy must make it clear that personal opinion is being stated (*NB. Whether or not that personal opinion agrees with LCiGB regulations is then an internal matter.*)
8. personal blogs by individual members of the LCiGB, where church is discussed, must provide a disclaimer stating that the content doesn't represent the views of LCiGB; (*NB. for LCiGB staff and clergy who maintain a personal blog such a disclaimer is compulsory.*)
9. if defamation of LCiGB is evident, members should inform the Chair of the LCiGB Council, the Bishop or Dean and not attempt to defend LCiGB personally.
10. any use of the facilities of LCiGB (the office and its computers) by individuals whether staff, volunteers or members must be for LCiGB business only.
11. responsible persons engaged to undertake internal and external communication tasks on behalf of LCiGB perform those tasks without undue interference, whilst noting that communication may be monitored and is always subject to trustee responsibility to safeguard communication in the church. (*NB. Misconduct may result in disciplinary action.*)
12. flagrant and/or consistent violation of LCiGB's Communication Policy by staff, members, or a congregation, shall be subject to reprimand under the Rules and Regulations, under relevant disciplinary sections.



4. Ground rules of communication

Compliance with ground rules in communicating is not meant to be restrictive. Criticism of the LCiGB is encouraged so long as it is constructive. At the same time, it is important to follow basic principles to comply with the need for high standards and legal compliance. These include, but are not limited to the following:

- Copyright
- Privacy
- Confidentiality
- Data protection
- Safeguarding

More detail about compliance requirements relating to the items listed above should be sought, if in any doubt.

5. What does this mean in practice?

The LCiGB is committed to communicating in the most appropriate manner for diverse groups and individual members, but with limited resources, the use of technical equipment and forms of electronic communication are essential tools to support efficiently the church's mission and ministry. In utilising these resources and electronic systems, it is important that all users are aware of the LCiGB policy regarding proper and responsible use.

In general, it is every user's responsibility to ensure that appropriate business purposes are carried out in a manner consistent with good stewardship and the mission of the LCiGB, i.e. responsibly, professionally and legally, and in a manner that does not compromise confidentiality, sensitive data or personal information, or the security of the LCiGB's resources. Therefore the following rules apply:

1. When undertaking the business of the church, a church email address or official letterhead must be used, and all correspondence must include the registered charity number and the registered company number. *(NB. This is a legal requirement.)*
2. When sending out an email to a group email list, it is important not to breach privacy by revealing the email addresses of individuals to other individuals on the list. Therefore, the email must be "blind copied" to the email group list. *(NB. The personal emails must not be visible in the "To" field of an email.)*
3. When using LCiGB equipment or an email address provided by the LCiGB to engage in social media, professional social networking activity (including but not limited to Facebook, LinkedIn, Twitter, personal blogs), all actions are public and users shall be held responsible for any and all activities.
4. Users shall obtain LCiGB permission prior to establishing any external LCiGB-related social media or professional social network.
5. LCiGB office computers and laptops provided for use to individuals come with software, and no other software shall be loaded, downloaded or received unless



approved by the LCiGB. *(NB. This is to avoid potential breaches of security as well as software licensing laws.)*

6. Users of LCiGB computers, laptops, email addresses, do not have a personal privacy right or a copyright to anything created, received or stored on an LCiGB machine, whether or not the item is designated as private or confidential.
7. The LCiGB reserves the right (without prior notice) to monitor users and to read, listen to and copy files or data contained on any items of its equipment, including but not limited to email messages, internet access records, voice messages, faxes, official employee content on internet discussion groups and personal file directories.
8. The LCiGB reserves the right to access its equipment for the purpose of complying with statutory requirements and internal investigations that may arise when assisting with the management of LCiGB electronic communications systems.

6. Prohibited Use in LCiGB Communications

Examples of prohibited use includes, but is not limited to any use that

1. contravenes any law, statute, regulation or ordinance
2. breaches any policy or procedure of the LCiGB, or interferes with and hinders the mission of the LCiGB
3. jeopardises the safety and security of LCiGB members of staff
4. jeopardises the safety and security of LCiGB equipment
5. jeopardises the tax-exempt status of the LCiGB, or any congregation of the LCiGB
6. jeopardises the charitable status of the LCiGB including the transmission of political or partisan campaign materials
7. contravenes the legal rights of any person or entity
8. creates unauthorised contractual liability for the LCiGB
9. gives the impression that a user is representing, giving opinions, making statements or commitments on behalf of the LCiGB, unless specifically authorised to do so by the LCiGB
10. results in transmission or receipt of immoral, obscene, pornographic, discriminatory, harassing or defamatory material except where receipt is specifically authorised for work purposes
11. interferes with the use of LCiGB resources or the computer resources of another person or entity
12. involves personal financial gain, for example engaging in lotteries, gambling or raffles
13. is inconsistent with norms of professional and business conduct
14. reflects adversely on the LCiGB.

7. Personal Computer and Personal Email addresses

Outside of LCiGB, it is recognised that a user has privacy rights when it comes to online activity conducted on a personal computer with a personal email address. However, what is



published on personal online site should never be attributed directly or indirectly to the LCiGB and should not appear to be endorsed by or to originate directly or indirectly from the LCiGB. If a user chooses to directly or indirectly disclose his or her church affiliation on a social network, or if the affiliation is commonly known, then such communication no longer would be regarded as personal.

8. Avoiding Harassing Behaviour

Information that is shared via electronic means is generally public information that can be viewed by others, and users are expected to respect the LCiGB, its employees, members, and congregations. When communicating about the LCiGB or LCiGB-related matters, users should not send or display any information that may be construed as offensive or harassing, such as (but not limited to) pornographic images, sexual references, racial slurs, comments regarding an individual's gender, age, sexual orientation, religious beliefs, national origin, disability or any other characteristic protected by law, or comments that threaten or intimidate. Any behaviour that can be construed as such must be reported to the Council of LCiGB.

9. Speaking or Writing on behalf of the LCiGB & Issues of Confidentiality

All contact with news media is coordinated centrally in the LCiGB by the Bishop, the Dean and The Council. Unless specifically instructed, users are not authorised, and, therefore, are restricted from speaking to news media or others on behalf of the LCiGB. Users are expected to protect the privacy of the LCiGB and its employees and clients and are prohibited from disclosing personal employee and non-employee information or any other non-public information to which they have access. Such information includes but is not limited to confidential or restricted information about the LCiGB, its employees, members, or congregations.

In the event that such information must be disclosed, prior written consent must be obtained from the LCiGB.

Users are responsible for ensuring that all information they share in LCiGB-related internet discussion groups, chat rooms, blogs or social networking sites is accurate and factual and that any personal opinions they express are clearly identified as "personal" and not the opinion of the LCiGB.

10. Recommendations, references for colleagues

Employment-related recommendations, comments, or references about current or former employees can have legal consequences, *even if* a user is making the recommendations personally and not on behalf of the LCiGB.

Therefore, users **MUST** clear all potential recommendations, references and comments with the Council of the LCiGB if they refer to anyone who is, or was, ever associated with the LCiGB.



11. Photographs

Photographs that include people, where individuals remain unidentifiable, e.g. with personal information such as names, may be used on publicity materials and web sites. However, it is recommended to ask permission of individuals prior to allowing a photo that includes them to be used in such a way. Wherever a description of the photo includes personal identifying detail (i.e. the individual's name), then that photo **cannot be used** without that individual's expressed written consent (email consent is acceptable).

Photos of children or vulnerable adults (whether identified by name or not) must **never be used** without written consent of the parent or guardian.

12. Whistleblowing and Reporting

The LCiGB expects and encourages individuals to report any violations (or possible or perceived violations) of this policy either to a line manager, or to a trustee, the Bishop or the Dean. See also the LCiGB's Whistleblowing Policy on its web site (at the bottom of the page): <http://www.lutheranchurch.co.uk/page/congregations>

13. Disciplinary Action

The LCiGB takes seriously any breach of this policy and of its rules, and shall investigate and respond to any report of violation. Contravention of this Policy may result in disciplinary action, which may include termination of employment or removal from responsible office.

14. Guidance and regulations

As a registered charity and a registered company limited by guarantee, the LCiGB is obliged to consider and follow guidance and regulations apply by The Charity Commission and Companies House. The LCiGB takes seriously such guidance for good practice and abides by relevant regulations.

In the UK, the LCiGB is also obliged to following statutory regulations, as found in the following:

- Copyright, Designs and Patents Act 1988
http://www.copyrightservice.co.uk/copyright/p01_uk_copyright_law
- Data Protection Act 1998
<http://www.legislation.gov.uk/ukpga/1998/29/contents>
- Computer Misuse Act 1990
<http://www.legislation.gov.uk/ukpga/1990/18/contents>
- Human Rights Act 1998
<http://www.legislation.gov.uk/ukpga/1998/42/contents>
- Freedom of Information Act 2000
<http://www.legislation.gov.uk/ukpga/2000/36/contents>



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- Equality Act 2010
<https://www.gov.uk/guidance/equality-act-2010-guidance>

The LCiGB hereby acknowledges the ELCA ideas and wording that has contributed to this document, in particular that contained in the ELCA's guidance, "ELCA Personnel Policies of the Churchwide Organization", section "19.0 Electronic Communications Policy", found on pp 42-44.

The LCiGB Council adopted this policy at its meeting held on 10.10.15.