

COMMUNICATIONS POLICY

Contents

1	Introduction	1
2	Aim	1
3	Scope	2
4	Data Protection	2
5	E-mails	3
6	Social Media	4
7	Communication with the Media	4
8	Council Press Releases	4
9	Councillor Press Releases	5
10	Guidance	5
11	Inappropriate Use	6
12	Monitoring	7

1 Introduction

- 1.1 Frodsham Town Council is committed to active community engagement through a wide range of channels, including online and social media.
- 1.2 The Council is committed to the provision of accurate information in respect of its functions, decisions and actions. Accordingly, great care needs to be taken when addressing communications within the Town Council and with outside bodies.
- 1.3 The aim of this Policy is to set out a Code of Practice to provide guidance to staff and Councillors about the use of media such as e-mails, blogs, social networking sites, podcasts, forums, messages boards or comments on web articles such as Twitter, Facebook, Instagram, LinkedIn and other relevant social media websites.

2 Aim

- 2.1 The aim of this Policy is to ensure:
 - 2.1.1 Engagement with individuals and communities and successful promotion of Council based services through the use of all media formats;
 - 2.1.2 A consistent approach is adopted and maintained on behalf of Frodsham Town Council;
 - 2.1.3 That Council information remains secure and is not compromised through the use of social and online media:
 - 2.1.4 That users operate within existing policies, guidelines and relevant legislation;

- 2.1.5 That the Council's reputation is upheld and improved rather than adversely affected;
- 2.1.6 That communication is effective, timely, appropriate, useful, engages with a wider audience and utilises cross-promotion of other Council communication tools (e.g. website, Facebook account etc).

3 Scope

- 3.1 This policy covers all individuals working at all levels within the Council, including all elected and co-opted councillors, the Clerk to the Council and all other employees. For ease, the word 'personnel' may be used as a collective term in this document.
- 3.2 It is also intended for guidance for others communicating with the Town Council.
- 3.3 This policy supplements and should be read in conjunction with all other policies and procedures adopted by the Council such as the Privacy Policy, Disciplinary Procedure, Members' Code of Conduct and such like.
- 3.4 This policy does not form part of any contract of employment and it may be amended at any time.
- 3.5 The policy covers all of the Council's online media channels, which are currently:
 - 3.5.1 <u>www.frodsham.gov.uk</u> website.
 - 3.5.2 E-mail addresses linked to the frodsham.gov.uk domain name
 - 3.5.3 Facebook @frodsham.gov.uk
- 3.6 Over time the Town Council may add to the channels of communication that it uses as it seeks to improve and expand the services it delivers. When these changes occur, this policy may be updated to reflect the new arrangements that it uses to communicate with people who live in, work in and visit Frodsham. The Council will always try to use the most effective channel for its communications.
- 3.7 The use of new media channels will not replace existing forms of communication. The website and other forms of social media will be used to enhance communication.

4 Data Protection

- 4.1 Frodsham Town Council is the Data Controller as defined by GDPR of personal data processed by the Council and Councillors. The Data Protection Officer is the Town Clerk.
- 4.2 Personnel must not send, receive or disseminate proprietary data or any confidential information belonging to Frodsham Town Council to or from a third party unless authorised. Permission to publish photographs or videos on social media sites should be sought from the persons, parent / guardian or organisations in the video or photograph before being uploaded.

5 E-mails

- 5.1 Some personnel will be provided with an e-mail address linked to the frodsham.gov.uk domain name upon their appointment to a position within the Council. Access to e-mail accounts will be removed as soon as a relationship with the Council ceases.
- 5.2 Individuals are responsible for what they post or send. Personnel are personally responsible for any online activity conducted via e-mail addresses linked to the frodsham.gov.uk domain name.

- 5.3 Personnel are restricted to ensuring use of these accounts is for the proper performance of their Council related duties only. These accounts should be the only ones used by personnel in relation to their Council related duties.
- 5.4 The use of email to exchange correspondence requires the same professional standards as other forms of communication. You should not send or forward mail which is defamatory or offensive for whatever reason.
- 5.5 The Council will audit and monitor use of the systems to ensure proper and effective business use. Privacy should not be expected in the use of Council email facilities. All email is stored and the Council may inspect an email (including personal emails) at any time.
- 5.6 No account details may be changed without first informing the Town Clerk.
- 5.7 Email to multiple addresses outside Frodsham Town Council should be sent as blind copy, (bcc). Messages sent to groups of people must be relevant to all concerned.
- 5.8 Councillors and staff are not permitted to debate matters of council business by e-mail. The correct procedure is for the debate to take place at a public meeting.
- 5.9 Junk mail is a hazard of internet life and efforts should be made to isolate it at source, if not it should be deleted immediately, and no attachments should be opened. It is important to keep virus protection up to date.
- 5.10 In order to protect from viruses, email attachments which might contain macros (word processor and spreadsheet files) or applications, should not be opened if they are from a sender whom you do not recognise, simply delete.
- 5.11 Be aware that agreements made by email have the same status as letters or formal contracts. The Clerk has the sole authority to purchase or acquire goods or services on behalf of the Council via email.
- 5.12 Email inboxes must be checked regularly to ascertain all correspondence within that system.
- 5.13 Arrangements must be made to ensure that inboxes are checked during times of absence due to holiday or sickness.
- 5.14 It is recommended that e-mails are retained for no more than twenty-four months before they are deleted. Those containing important material should be saved to a separate folder.

6 Social Media

- 6.1 The Town Clerk is the designated 'Council' owner of social media channels agreed by the Council and will be an administrator / moderator on all accounts.
- 6.2 Other personnel officially appointed by the Council may assist the Town Clerk to disseminate information. However, all must ensure they follow this policy.
- 6.3 No account details may be changed without first informing the Town Clerk.
- 6.4 Individual Councillors are at liberty to set up their own social media accounts but they

- should ensure they comply with this policy and ensure that a 'personal view' disclaimer is used.
- 6.5 All social media sites used should be checked and updated on a regular basis to ensure that the security settings are in place.
- 6.6 The nominated moderator or moderators shall remove any negative posts which may contain personal and inflammatory remarks, libellous or defamatory information without further comment or notification. Such posts will also be reported to the Hosts (i.e. Facebook).

7 Communication with the Media

- 7.1 The Town Clerk will co-ordinate all media enquiries into the Town Council office. In certain circumstances it may be appropriate for the Chair of Council to respond to the enquiry.
- 7.2 Members of the Town Council's staff who are directly approached by the media should not attempt to answer questions themselves and should refer the enquirer to the Town Clerk.
- 7.3 The Council should not pass comments on leaks, anonymous allegations or allegations about individual staff and Members.
- 7.4 The phrase "no comment" should not be used as a response to a media enquiry. The Council is open and accountable and should always explain if there is a reason why it cannot answer a specific enquiry.
- 7.5 Only the Town Clerk is authorised to communicate on behalf of the Town Council. Individual members cannot communicate on behalf of the Town Council unless expressly authorised to do so at a council meeting or committee.

8 Council Press Releases

- 8.1 An official Council release is made on behalf of the Council as a whole; it will be written and issued by the Town Clerk.
- 8.2 Official Council releases will follow a corporate style appropriate for the media being targeted and a central record will be maintained.
- 8.3 All releases will accurately reflect the corporate view of the Council, contain relevant facts and may include an approved quotation from an appropriate Councillor.
- 8.4 Releases will not promote the views of specific political groups, publicise the activities of individual Councillors, identify a Member's political party or persuade the general public to hold a particular view.
- 8.5 All official Council releases will be placed on the Council's website.

9 Councillor Press Releases

- 9.1 Councillor press releases are personal and are written and issued by the Councillor responsible.
- 9.2 This type of release may or may not be political and should not include the name of any Officer, use the Council logo or the Council telephone number as a point of contact.

- 9.3 Members may not hold themselves out to be acting on behalf of the Town Council and must not communicate as Councillor in any other matter than in their official capacity.
- 9.4 Councillors are not permitted to use the title "Councillor" in their private capacity.
- 9.5 It would be beneficial for copies of intended releases to be provided to the Clerk. Councillors seeking advice can contact the Clerk.

NOTE: Members should be aware that case law states that the role of Councillor overrides the right to act as an individual. This means that Councillors should be careful when expressing individual views to the news media. Councillors also have an obligation to respect Council policy once made, while it may be legitimate for a Councillor to make it clear that he or she disagreed with a policy and voted against it (if this took place in open session), they should not seek to undermine a decision through the news media.

10 Guidance

- 10.1 As a local council Frodsham Town Council has a professional image to uphold and how personnel conduct themselves publicly and online impacts this image.
- 10.2 Be responsible and respectful; be direct, informative, brief and transparent.
- 10.3 Always disclose your identity and affiliation to Frodsham Town Council. Never make false or misleading statements.
- 10.4 You should not present yourself in a way that might cause embarrassment to the Council.
- 10.5 Be mindful of the information you post on sites and make sure personal opinions are not published as being that of the Council, bring the Council into disrepute or are contrary to the Council's Code of Conduct and other Policies.
- 10.6 Avoid personal attacks, online fights and hostile communications.
- 10.7 Respect the privacy of other councillors and residents. Do not disclose confidential matters or criticise Council policies or personnel.
- 10.8 Residents and councillors should note that not all communications require a response.
- 10.9 There will not always be immediate responses to communications as they may be discussed at a meeting so that a response can be agreed by the Town Council. When this is necessary the item will be placed on the next available agenda. Any response will then be included in the minutes of the meeting.

11 Inappropriate Use

- 11.1 Users must not use online platforms to abuse or inflame others or to harass or threaten anyone. Responding to abuse, harassment or threatening will not be accepted as an excuse for inappropriate language and/or behaviour.
- 11.2 Recipients of abusive or threatening content related to the business of the Council must immediately inform the Clerk or Chair.
- 11.3 Users must not send or post content containing obscene, abusive or profane language.

- 11.4 Users must not send, access, display, download, copy or circulate information containing stories, jokes or anecdotes that contain:
 - 11.4.1 pornography or sexually orientated images;
 - 11.4.2 gambling;
 - 11.4.3 gaming (playing computer games);
 - 11.4.4 promotion of unlawful discrimination of any kind;
 - 11.4.5 promotion of racial or religious hatred;
 - 11.4.6 threats including the promotion of violence;
 - 11.4.7 fraudulent or illegal material promotion of illegal and/or unlawful acts;
 - 11.4.8 information considered to be offensive, inappropriate or disrespectful to others;
 - 11.4.9 unauthorised and copyrighted material including music.
- 11.5 Frodsham Town Council will report to the police all known incidents in which users intentionally send or receive content containing the following:
 - 11.5.1 images of child pornography or child abuse (i.e. images where children are or appear to be under the age of 16 and are involved in sexual activities or posed to be sexually provocative);
 - 11.5.2 adult material/pornography that breaches the Obscene Publications Acts (1959 & 1964):
 - 11.5.3 criminally racist material.
- 11.6 Councillors or residents who have any concerns regarding content in e-mails or placed on social media sites should report them to the Town Clerk.
- 11.7 If inappropriate material is accessed accidentally, users must report this immediately to the Clerk. It can then be taken into account as part of the Council's monitoring procedure.

12 Monitoring

- 12.1 Misuse of such sites in a manner that is contrary to this and other policies could result in action being taken.
- 12.2 Serious breaches of this policy by a Council employee will amount to gross misconduct and may result in dismissal.
- 12.3 Breaches of this policy by councillors may result in a Code of Conduct complaint being submitted against them.
- 12.4 Serious breaches of this policy by councillors, members of the public or members of any other organisation or company may result in legal or police action.