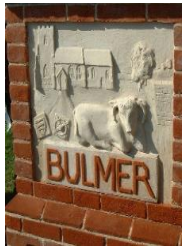




Bulmer Parish Council



Communications & Social Media Policy

COMMUNICATIONS POLICY

This communications policy seeks to ensure that the Council's communications are focused and directed when key messages about the Council's work are shared with residents and other local stakeholders. The Council wishes to provide information, elicit feedback and engage with the community.

This policy also seeks to clarify the roles and responsibilities of all officers and members involved in dealing with colleagues, the public and the press and to provide guidance on how to handle media interest in a professional and objective manner.

As there are always ways in which to improve this document must be seen as work in progress.

The purpose of this policy is to ensure:

- That the Council is not exposed to legal and governance risks;
- That the reputation of the council is not adversely affected;
- That the users of the Council's social media posts are able to clearly distinguish where information provided via social media is legitimately representative of the Council.

The Legal Framework

The law governing communications in local authorities can be found in the Local Government Acts 1986 and 1988. The Council must also have regard to the government's Code of Recommended Practice on Local Authority Publicity. Some aspects of the Code are relevant to this policy:-

- "Any publicity describing the Council's policies and aims [and the provision of services] should be as objective as possible, concentrating on facts or explanation or both."
- "Publicity touching on issues that are controversial, or on which there are arguments for and against the views or policies of the Council... should be handled with particular care. Issues must be presented clearly, fairly and as simply as possible, although councils should not oversimplify facts, issues or arguments."
- "Publicity should not attack, nor appear to undermine, generally accepted moral standards."
- "... local authorities... should not use public funds to mount publicity campaigns whose primary purpose is to persuade the public to hold a particular view on a question of policy."
- In particular, officers and Councillors should always have due regard for the long-term reputation of the Council in all their dealings with the media.

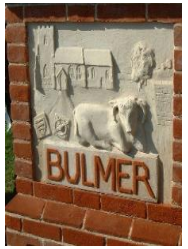
Confidential documents, exempt Minutes, reports, papers and private correspondence should not be leaked to media channels. If such leaks do occur, an investigation will take place to establish who was responsible and take appropriate action.

There are a number of personal privacy issues for officers and Councillors that must be handled carefully and sensitively. These include the release of personal information, such as home address, private e-mail address and telephone numbers (although some Councillor contact details are in the public domain), annual leave, disciplinary procedures and long-term

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sickness absences that are affecting service provision. In all these and similar situations, advice must be taken from the Parish Clerk before any response is made to the public or the media.

It is illegal to use graphics or photographs without permission. Ensure that anyone giving permission to use an image is the original copyright owner and check the licensing agreement of photographs in any existing archives before use. Do not take or use any photographs of children who appear to be under the age of 18 without permission from a parent or guardian. Permission is non-transferable from a third party, such as a school.

Internal Communications

Internal communications between officers and members are just as important as those to the outside world. The Council is also subject to the Freedom of Information Act 2007 and therefore all communications of the Council can be subject to public scrutiny (with certain exemptions).

Communications via Email

Email is now the method of choice for Council communications as it saves both time and money for the Council. Therefore, all communications, including agendas for Council meetings, will be sent by email.

Councillor Email addresses

All Councillors are required to use a dedicated Parish Council email address, to comply with General Data Protection Regulations, which will be made available to the public to enable them to communicate directly with them.

Councillor Communications by Email

- When Councillors communicate with each other by email, they should use the "Reply All" option to ensure that all Councillors are fully aware of all the information which is pertinent to them and the point under discussion.
- Where an item is linked to standard Committee or Working Party business, group members should communicate with each other rather than all Council members. However, if it is felt that the matter is of some importance or is contentious in any way, the full Council membership will be informed of the business in hand.
- This policy is not designed to preclude private and or personal communications between Councillors and/or officers in the daily running of the Council.

Agendas and supporting material to Councillors

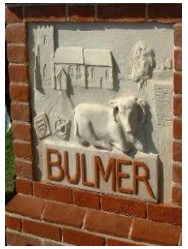
There is a statutory requirement to issue agendas for all Council meetings a minimum of 3 clear days before the meeting. These will be sent by email with supporting materials to all Council and Committee members within the statutory timescale, and published on the Parish Council website and noticeboards.

Minutes of Council Meetings

A draft of each meeting's minutes will be emailed to councillors for their comments. One week after sending the draft minutes the minutes shall be uploaded onto the Parish Council website in draft form until they are formally approved. If there are any inaccuracies in the draft minutes, these should be pointed out to the Clerk at the earliest opportunity. Minutes of



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previous meetings for approval at the next meeting will be available for Councillors and/or Committee members to review at the same time as the agenda for the following meeting is posted.

Private Meetings

- Private meetings arranged between representatives of the Council and other organisations enable the Council to liaise with these organisations on specific matters. Meetings must be reported to the Council and representatives should adhere to the known policy of the Council. There should be no decision making by individuals at the meetings.
- An officer will be present wherever possible and take notes of the meeting. The notes should be circulated to all Council members within 3 days of the meeting taking place.

Private Councillor Meetings

- There should be no decision making by individuals involved where the Council is not convened. This goes against both the purpose of the Council and the requirement to be transparent to the public eye. It can also put Councillors at risk of personal liability.
- Councillors are entitled and encouraged to share views with each other, however, decision making shall be left to formal Council meetings, unless a clear mandate to proceed has been minuted. Where such a mandate exists, Councillors must be aware of, and abide by, the scope of the mandate to ensure they do not inadvertently or otherwise stray beyond it.

Recording of Communications

Councillors or committee members who have taken on responsibility for some action which involved written or verbal communication with third parties should lodge a copy of any communication with the Clerk. This is to ensure a consistent and complete set of records are held which adequately reflect Council business and are available for reference should the need arise. These shall include:

- Letters or emails sent and received
- Notes or minutes of any meetings which may have been held or attended
- Notes or minutes of any face-to-face or telephone conversations held

Communications with Parish Council Staff

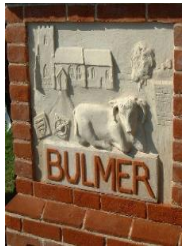
Whilst all Members and Staff are encouraged to develop contact with each other, both Councillors and Staff need to be conscious of the "Employer" and "Employee" relationship and professional standards should be maintained at all times. Both should be aware that requests directly from Members to employees to action given matters whether established Council policy or not, can disrupt established routines and work programmes and could confuse line management. Members wishing to have urgent action to be taken should contact the Parish Clerk who can then re-schedule staff priorities if necessary.

Councillors must not give instructions to any member of staff, unless specifically authorised to do so (for example, 3 or more Councillors sitting as a Committee or Working Group with appropriate delegated authority from the Council). In such circumstances Members who wish to investigate or promote any issue for possible adoption and/or action should, in any event discuss the matter with the Clerk so that preliminary consideration can be given to the legal, financial, technical and staffing implications and to the possible impact and relationship to existing projects or policies in which the Council is currently involved.

Telephone calls should be appropriate to the work of the Parish Council.



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Emails

Instant replies should not be expected; reasons for urgency should be stated. Information to Councillors should normally be directed via the Clerk.

E-mails from Councillors to external parties regarding Council business should be copied to the Clerk.

Councillors should acknowledge their e-mails when requested to do so.

Meetings with the Clerk or other Officers

Wherever possible an appointment should be made.

Meetings should be relevant to the work of that particular officer.

Councillors should ensure that the matter is legitimate council business and not matters driven by personal or political agendas.

External Communications

External communication deals with the way the Council presents itself and its workings to the general public. This includes what is communicated, how it is communicated and when it is communicated.

The Council should aim to cover a number of different delivery mechanisms to achieve the maximum coverage possible to residents and other interested third parties. The list is not exhaustive and some residents will only use limited methods due to their personal circumstances and preferences.

If a Councillor receives a complaint from a member of the public, this should be dealt with in accordance with the Council's adopted Complaints Policy and raised with the Clerk, unless the complaint concerns the clerk in which case it should be raised with the Chairman.

Public Sessions

The Council shall provide an opportunity for members of the general public to participate in Council meetings.

Public Consultations and Open Days

The Council shall provide public consultations and open days to present issues and new projects to the community and to encourage discussion and constructive feedback.

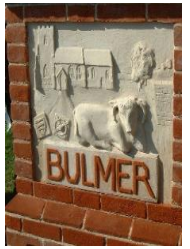
Parish Council Website

Information shall be published on the website as and when required. The website should be reviewed weekly and kept as up to date as possible to ensure residents enjoy visiting the site. Information shall include:

- Agendas of next meetings
- Approved minutes of previous Council meetings
- Annual reports
- Annual returns
- Planning applications to be discussed at the next meeting
- Details of how to contact the Council
- Councillor details
- Council policies
- Other useful information including District and County Council news and links
-



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Bulmer What's Going on Newsletter

The clerk will the Parish Council to the newsletter editor at the appropriate time for publication to ensure important information in the minutes is communicated promptly.

Village Noticeboards

Monthly Parish Council information such as agendas and minutes, together with statutory Parish Council notices shall be displayed on the main Parish Council noticeboard by Coes Meadow at Bulmer Street. The noticeboard at Park Lane allotments shall be used for displaying meeting agendas, annual information such as Councillor contact details, Calendar of meetings and any other community interest notices at the discretion of the clerk. Commercial advertising will not be permitted unless in exceptional circumstances.

Communications with the Press and Public

The Clerk will discuss press reports, or comments to the media with appropriate Councillors or the Chairman. If the Chairman is absent the report or comments will be discussed with the Vice Chairman.

Press reports from the Council, its Committees or Working Groups should be from the Clerk or a nominated Councillor, or via the reporter's own attendance at a meeting.

Unless a Councillor has been authorised by the Council to speak to the media on a particular issue, Councillors who are asked for comment by the press should make it clear that they are giving a personal view and ask that it be recorded as their personal view.

Parish Council Correspondence

The point of contact for the Parish Council is the Clerk, it is to the Clerk that all correspondence to the Parish Council should be addressed.

The Clerk should deal with the correspondence and will ensure that information or direct enquiry is passed to Councillors as appropriate.

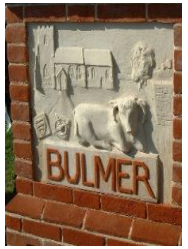
No individual Councillor or Officer should be the sole custodian of any correspondence or information in the name of the Parish Council, a Committee, Sub Committee or Working Group. In particular Councillors and Officers do not have the right to obtain confidential information/documentation unless they can demonstrate a "need to know".

All official correspondence should be sent by the Clerk in the name of the Council using letter headed paper.

Where correspondence is copied by a Councillor or the Clerk to another person, the sender or addressee should be made aware that a copy is being forwarded to that other person.



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SOCIAL MEDIA POLICY

The aim of this policy is to ensure;

- Engagement with individuals and communities and successful promotion of council-based services through the use of social media;
- A consistent and corporate approach is adopted and maintained in the use of social media.
- That users operate within existing policies, guidelines and relevant legislation;
- That the Council's reputation is not damaged or adversely affected.

The Council aims to make use of social media to quickly disseminate information but to carefully control use in order to minimise any risk to the Council.

The policy provides a structured approach to using social media and will ensure that it is effective, lawful and does not compromise Council information, computer systems or procedures.

This policy aims to ensure that users (regardless whether they are using a personal or official account) are using social media responsibly and that its use will not adversely affect the Council or its business; will not damage the Council's reputation and credibility, or otherwise violate Council policies.

Responsibilities

The Parish Clerk is the designated owner of all social media accounts in Bulmer Parish Council's name.

Where a social media account has been set up by another party or Councillor, full access will be provided to the Parish Clerk. Ownership will be transferred where and when deemed necessary by the Parish Clerk.

The opening of any new social media channel in Bulmer Parish Council's name should be approved by the Parish Clerk.

The Parish Clerk will designate a site administrator if required who will be expected to monitor and provide maintenance of any content on the official Bulmer Parish Council social media channels.

Councillors and staff are at liberty to use their own social media accounts on any platform they choose. These must be identified as personal and make it clear that they do not represent the Council.

Any personal social media account used in relation to the Council is the responsibility of the account holder and must comply with this social media policy.

Councillors and staff should at all times present a professional image and not disclose anything of a confidential nature. Comments of a derogatory, proprietary or defamatory nature must not be made, care should be taken to avoid guesswork, exaggeration and colourful language. Guidelines on standards of behaviour expected can be found in this policy.

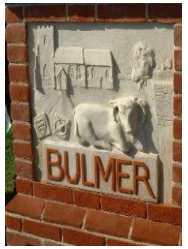
Monitoring content and measuring engagement

The Parish Council reserves the right to restrict or remove any content on the Parish Council social media platform that is deemed in violation of the social media policy or applicable law. Users will be informed that their posts may not be published/or may be deleted if they meet any of the criteria below;

- Comments not topical to the article being discussed;
- Comments that are politically motivated;



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- Profane language;
- Material that perpetuates discrimination of protected characteristics as listed in the Equality Act 2010, including age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnerships, pregnancy and maternity;
- Solicitation of commerce i.e.; Trying to sell items or encourage the sale of products or services not related to the Council;
- Illegal conduct or encouragement/support of illegal activities;
- Information that compromises or may compromise the safety or security of the public or public systems;
- Content that violates the legal ownership interest of any other party;

Users may include any staff member acting as Bulmer Parish Council on social media channels but on some channels this may also include members of the public who have the opportunity to post on Bulmer Parish Council's page.

Posts to Bulmer Parish Council official channels that do not observe these standards may be retained or acknowledged when it would be beneficial to transparency. As anything put online will in practice remain online even when deleted, it is often better not to try to hide it, rather deal with it openly and recognise the 'offence'. If and when this may be required is at the discretion of the Parish Clerk.

Impact on the Council's post will be monitored, so far as each platform allows, e.g., to ascertain the number of reposts stimulated to assist in measuring engagement.

The law and social media

There are two ways to think about the harmful acts which may be committed using social media, a) either they are new acts, or b) they are acts already prohibited by criminal law but now committed in the "new" forum of social media as opposed to elsewhere.

Harassment, malicious communications, stalking, threatening violence, incitement, defamation etc are all unlawful and have been for a long time.

The Director of Public Prosecutions has published guidelines for the application of current statute law to prosecutions involving social media communications. The guidance is structured by conduct, relating different sorts of conduct to different potential offences, some of the statutes which have a bearing are:

- Data Protection Act 1998
- Freedom of Information Act 2000
- Human Rights Act 1998
- Equalities Act 2010
- Defamation Act 2013
- Malicious Communications Act 1988
- Communications Act 2003

Guidelines on the use of Social Media

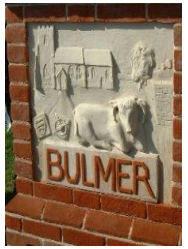
Standards of behaviour expected as a representative of Bulmer Parish Council (official and personal accounts)

- Be aware of your responsibilities as defined in this social media policy;
- Remember you are responsible for the content you post on social media;
- Never give out personal details, such as home address and telephone numbers. Contact details should only be given out when they are in the public domain and even then, it is best practice to exchange such contact details outside public social media channels;

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- Know your obligations. You must comply with other council policies when using social media;
- Show respect to all. Be respectful of the authority, employees and other members of the council;
- Be aware that social media networks are rapidly growing in popularity and are used by all ages in society;
- Always remain aware of web security, ensure you use a secure password and keep your computer or other hardware secure from viruses;
- Ensure that any mobile device you use to access social media is also secure to avoid others using your device to post under your own name;
- Do not get involved in an argument online, neither party tends to come off well. Limited space and a short time frame in which to phrase a response can inflame a situation. Try to introduce a constructive discourse by asking for useful feedback or assistance to change, or acknowledge the complaint and try to take the diffusion offline;
- Online there are individuals who purposefully start and perpetuate an argument. If someone is refusing to act rationally or unwilling to discuss offline be alert to this. If you identify such a situation the best response, having once given the opportunity to discuss rationally is to cease this interaction.

Standards of behaviour expected as a representative of the Parish Council

Official channels:

- Channels will only be operated during business hours;
- Keep the content relevant to the audience:

Appropriate content may include

- Any Bulmer Parish Council project or project in which the Council is working in partnership;
- Sharing projects from partners relating to the above;
- Sharing information in the local public interest;

Avoid where practical any linking of professional and personal social media accounts within web enabled devices and applications. It is appreciated that some platforms such as Facebook will not work correctly without a certain amount of linkage between personal profile and business pages, however, care should always be taken to ensure you are responding as the correct entity at all times.

Personal accounts

Use a disclaimer. When using social media for personal purposes, you must not imply you are speaking for the Council. Make it clear that what you say is representative of your personal views only.

When responding to social media comments/statements the same should apply by advising that this is a personal view and not necessarily the view of the Council. When responding a Councillor should report that they are responding on a non- Councillor basis.

Unless a Councillor is absolutely certain that he/she is reporting the view of the Council, whether or not they agreed with the decision when it was made, they must make it clear to members of the public they are expressing a personal view.