WHITEHILL
TOWN COUNCIL
Serving Whitehill & Bordon

COMMUNICATION & SOCIAL MEDIA POLICY

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Whitehill Town Council (the Council) Communication & Social Media Policy is based upon three key principles which enable the council to work more effectively.

These are:

Communication – directly communicate important and timely messages, news and information, promote events and improve awareness of services by providing direct digital access to them.

Engagement – seek opinions, share conversations and better engage with residents. We can help to improve residents' knowledge and correct misconceptions.

Collaboration – find more efficient ways of working together and sharing information which can change or enhance the perception of the council and that of specific service areas or projects.

1.0 INTRODUCTION

1.1 The purpose of this policy is to define the roles and responsibilities within the Council for interacting with the media and with the public through social media channels.

1.2 It is not the intention of this policy to curb freedom of speech or to enforce strict rules and regulations. Rather, the intention is to establish a framework for achieving an effective working relationship with both the public and the media. The Council welcomes the opportunity to talk with media channels and, through them, to debate issues in the public arena.

2.0 KEYS AIMS

2.1 The Council is accountable to the local community for its actions and this can only be achieved through effective two-way communications. The media – press, radio, TV, internet – are crucially important in conveying information to the community so the Council must maintain positive, constructive media relations and work with them to increase public awareness of the services and facilities provided by the Council and to explain the reasons for particular policies and priorities.

2.2 The media themselves have a vital role to play on behalf of the local community in holding the Council to account for its policies and actions. It is important that they have access to officers and members and to background information to assist them in this role. To balance this, the Council will defend itself from any unfounded criticism and will ensure that the public are properly informed of all the relevant facts using other channels of communication if necessary.

3.0 THE LEGAL FRAMEWORK

3.1 The Council must comply with all relevant legislation governing communication, information management and publicity. Key legislation and guidance currently includes:

- Local Government Act 1986 and Local Government Act 1988 (publicity provisions).
- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (governing personal data and privacy).
- Online Safety Act 2023 (governing harmful and illegal online content and the Council's responsibilities in moderating and reporting content where necessary).

- Local Government Association (LGA) Model Councillor Code of Conduct (2020, as updated).
- The Code of Recommended Practice on Local Authority Publicity (2011).

3.2 Officers and Members should have due regard for the long-term reputation of the Council in all their dealings with the media.

3.3 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.

3.4 There are a number of personal privacy issues for officers and members that must be managed carefully and sensitively. These include the release of personal information, such as home address, private e-mail address and telephone numbers (although Member contact details are in the public domain), annual leave, disciplinary procedures and long-term sickness absences that are affecting service provision. In all these and similar situations, advice must be taken from the Town Clerk before any response is made to the media. Any personal data must be processed in accordance with the UK GDPR and Data Protection Act 2018.

3.5 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.

4.0 CONTACT WITH THE MEDIA

4.1 When responding to approaches from the media, the Town Clerk is usually the main contact with permission to speak to the media. However, as per committee terms of reference, the Chairman of Committee or Sub-Committee may liaise with third parties regarding the area of responsibility of their Committee or Sub-Committee and thus may have contact with the press.

4.2 Any statements made by any member of officer under this clause 4 should reflect the Council's resolved opinion and set policies.

4.3 If other councillors are contacted directly by the media for comment on behalf of the council, they should consult with the Town Clerk before responding to the request.

4.4 Caution should be exercised when submitting letters to the editor for publication in newspapers. There are occasions when it is appropriate for the Council to submit a letter, for example to explain important policies or to correct factual errors in letters submitted by other correspondents. However, such letters should be kept brief and balanced in tone and correspondence should not be drawn out over several weeks.

4.5 Letters representing the resolved views of the Council should only be submitted by the Town Clerk (in consultation with the Leader) or Leader. However, as per committee terms of reference, the Chairman of Committee may liaise with third parties regarding the area of responsibility of their Committee and thus may write letters to the press. If a member sends a letter to the press as an individual, they should make it clear that the views expressed are their personnel views and not those of the Council (unless such views have been adopted by Council).

4.6 At all times consideration should be given as to how the correspondence may affect the reputation of the Council.

5.0 ATTENDANCE OF MEDIA AT COUNCIL OR COMMITTEE MEETINGS

5.1 The media are encouraged to attend Council and Committee meetings and seating and workspace will be made available.

5.2 Filming or taping of Council or Committee proceedings by the media is permitted in accordance with Standing Orders and the Council Protocol on the Recording of Meetings.

6.0 ELECTIONS

6.1 The Code of Recommended Practice on Local Authority Publicity (2011) contains guidance for providing publicity for Members and for publicity around elections. The code makes it clear that Council resources should not be used on publicising individual members unless it is relevant to the particular position they hold in the Council.

These extracts from the Code illustrate the main points:-

"Publicity about individual councillors may include the contact details, the positions they hold in the council (for example, Town Mayor or Leader), and their responsibilities. Publicity may also include information about individual councillors' proposals, decisions and recommendations only where this is relevant to their position and responsibilities within the Council. All such publicity should be objective and explanatory, and … personalisation of issues or personal images making should be avoided."

"Publicity should not be, or liable to misrepresentation as being, party political. Whilst it may be appropriate to describe policies put forward by an individual councillor which are relevant to their position and responsibilities within the council, and to put forward their justification in defence of them, this should not be done in party political terms, using political slogans, expressly advocating policies of those of a particular party or directly attacking policies and opinions of other parties, groups or individuals."

"The period between the notice of an election and the election itself should preclude proactive publicity in all its forms of candidates and other politicians involved directly in the election."

6.2 In line with practice elsewhere in the country, the Council will not quote any Councillor in a news release or involve them in proactive publicity events during the election period, regardless of whether they are standing for election. The only exception to this (as laid down in the Code of Recommended Practice on Local Authority Publicity (2011)) is during an emergency or where there is a genuine need for a member level response to an important event outside the control of the Council. In this situation, members holding key civic positions should be able to comment.

7.0 PRESS RELEASES

7.1 The purpose of a press release is to make the media aware of a potential story, to provide important public information or to explain the Council's position on a particular issue. It is the responsibility of all officers and members to look for opportunities where the issuing of a press release may be beneficial.

7.2 All press releases are to be factual, non-political, not written to cause offence and must be in accordance with Council policy.

7.3 All press releases are to be issued by the Town Clerk (but may be drafted by other officers, subject to approval) in order to ensure that the principles outline in section three (Legal Framework) are adhered to, that there is consistency of style across the Council and that the use of the press release can be monitored. The Leader will be consulted on all press releases and the Town Clerk may consult other members, following the member/officer protocol guidelines.

8.0 SOCIAL MEDIA

8.1 This policy applies to the use of all social media by any Councillors and employees of the Council.

8.2 The use of digital and social media and electronic communication enables the Council to interact in a way that improves the communications both within the Council and between the Council and the people, businesses and agencies it works with and serves.

8.3 The Council has a website, Facebook page, Instagram, YouTube and uses email to communicate. The Council will always try to use the most effective channel for its communications.

8.4 The Council Facebook and Instagram page intends to provide information and updates regarding activities and opportunities within our Town and promote our community positively.

8.5 Anything written on a Council social media channel reflects on the organisation, but given the relaxed style of social media, it is important not to appear overly formal.

Communications from the Council will meet the following criteria:

- Be civil, tasteful and relevant.
- Not contain content that is knowingly unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive.
- Not contain content knowingly copied from elsewhere, for which we do not own the copyright.
- Not contain any personal information.
- Social media will not be used for the dissemination of any political advertising.

8.6 The Town Clerk has oversight of the Council's Social Media Channel and will determine the designated administrator of the Council's Social Media channels including Facebook and Instagram. All postings should be directed through the office.

8.7 The site is not monitored 24/7 and we will not always be able to reply individually to all messages or comments received.

8.8 The council is under no obligation to moderate posts or comments made by the public on its social media channels. However, the council would not want to be seen to be endorsing comments which are defamatory, false or misleading; insulting, threatening or abusive; obscene or of a sexual nature; offensive, racist, sexist, homophobic or discriminatory against

religions or other groups; promoting illegal activity; or intended to deceive. Such posts to the Council Social Media pages will be removed.

8.9 Occasional negative posts cannot be avoided, but how they are dealt with has implications for the Council's reputation. They should not be ignored, although sometimes no answer is required if it is a rhetorical question, a repetition of an earlier posting, or a post designed to provoke. Individual Councillors should resist from responding directly to these comments. The Town Clerk consulting with the Leader will agree a formal response when required.

8.10 As posts are public it is better to answer them in public, although occasionally it may help to take them onto a private channel.

8.11 While the private accounts of authority employees and Councillors are their own business, the content posted on them must not affect their professional standing and/or that of the Council.

8.12 Members and Officers should not include any reference to, or post comments about, the council, job roles, colleagues. If however references to your employment or connection with the council are made on a personal social media profile, Members and Officers should ensure the following actions are followed:

- Declare somewhere on your page or biography that the views expressed are yours alone
- Do not bring the authority into disrepute
- Do not reveal any potentially confidential or sensitive information about the authority that you may have come across in your work or role for the Council.
- Do not use any council-owned images or logos
- Do not include contact details or photographs of service users or staff.
- Do not make offensive comments about the authority, members, officers, colleagues or members of the public as this is a disciplinary offence

8.13 The Town Clerk should consult the Leader prior to any action being taken under sub-clauses 8.8 or 8.9.

8.14 The Council may 'like', comment and share social media posts from other third-party organisations, subject to ensuring that they are appropriate to support the positive image of the Council. Any 'like', comment or share must not contravene town council resolved policy or imply policy that is not formally resolved. If the Town Clerk (or a designated administrator appointed by the Town Clerk under clause 8.6) is in any doubt as to whether a 'like', comment or share is inappropriate, they should consult the Leader. This clause allows the Council to strive to be a useful key communicator between third party organisations and residents.

8.15 The Council is committed to ensuring that digital and social media content is accessible. Posts will, where practical, use clear language, include alt text for images and captions for videos, and consider the needs of residents with limited digital access. The Council works towards meeting the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.

8.16 Content posted on official Council social media accounts may constitute a public record. Where required, such content will be retained in line with the Council's Records Management and Retention Policy and may be subject to FOI and EIR requests.

APPENDIX A - UNIVERSAL PRINCIPLES WHEN USING SOCIAL MEDIA.

1. Be human

Be approachable in your language and tone.

2. Be engaging

Respond to questions and talk back when you can move the conversation on or help.

3. Be professional

Remember that you are representing the Council.

4. Share and say where it came from

You can share what others have posted but it is polite to acknowledge and attribute where this has come from.

5. You cannot control, only contribute

You cannot stop conversation amongst residents. You can only contribute to it.

6. Content is king

By creating sharable and engaging content you can contribute to the conversation and be heard.

7. Be authentic

Do not try and pretend to be something you are not. Ghosted accounts are not authentic.

8. Be trusting

We cannot monitor every conversation, letter, phone call or email. Trust your staff and you will gain far more than you will lose.

9. Be strategic

Plan ahead – who do you want to engage with, why and how? What do you want to achieve?

APPENDIX B - Social media policy - Do's and don'ts template from the Local Government Association (LGA).

Do not post any message on social media that you would not happily say in a public meeting.

LGA Policy template: Do's and don'ts at a glance:

Do

• talk to residents, staff and others. And do answer their questions (quickly and honestly)

• trust your teams and staff to use social media

• be responsible at all times

• be respectful at all times, too

• innovate – different approaches work for different people

• have a personality – corporate speak or just issuing press releases will not work well on social media

• share other people's helpful content and links

• credit other people's work, ideas and links

• listen (social media is designed to be a two-way channel, just like any good conversation)

• ask your own questions. Seek feedback from your residents (but make sure you share the results with them)

• have a rota where appropriate – share the load and you will get more from your accounts

• adhere to your existing HR policies – you do not need a separate HR policy especially for social media

• talk to your communications team – they are there to help you

• and more than anything, do use social media in the spirit in which it was intended – to engage, openly and honestly.

Do not

• broadcast or talk at people. Your residents will soon spot broadcasts and respond accordingly

• block social media – social media is not a risk, blocking its use is a risk

• try to cover up mistakes, be honest and you will get more respect for it in the long run

• build accounts and just hope people will come – sometimes it is best to go to the places where your audiences are already having conversations

• assume that social media will look after itself – you will need to invest time, enthusiasm and energy to make it work. And do not leave your accounts unattended for long spells

• post content which will embarrass your council or yourself

• ignore legal advice, it is there to help you

• think that a disclaimer in your bio will save you from potential legal action, it will not

• expect your staff to make do with old technology which can be a barrier to effective working

• share your passwords with anyone other than your communications lead

• forget that social media is 24/7 – just because you leave at 5.00 pm does not mean the world stops or that residents will not be active. If your account is only staffed 9-5 then you should say so on your profile