

COMMUNICATIONS PROTOCOL POLICY

1 INTRODUCTION

This Protocol has been drawn up in accordance with the "Governance Toolkit for Parish and Town Councils" prepared as a partner publication by *Association of Council Secretaries and Solicitors, Society of Local Council Clerks, Standards for England, the National Association of Local Councils and the Local Government Association*. It also takes into account the principles in the National Code for Recommended Practice on Local Authority Publicity 2001.

The Code of Practice aims to help local government communicate effectively and impartially so that legitimate political debate is not stifled. It states "*The main purpose of local authority publicity is to increase public awareness of the services provided by the authority and the functions it performs; to explain to electors and ratepayers the reasons for particular policies and priorities; and in general to improve local accountability*".

Guidance on social media has been included. From an insurance perspective, the Council needs to control and closely monitor the accounts to ensure appropriate use. If a councillor operates a social media page 'as a councillor' insurance cover may be afforded under the Parish Council's insurance policy; however, the councillor would need to follow the Council's guidelines and remove any items which are not the Council's own opinion, or are derogatory in nature. If a Councillor operates a personal social media page, then any issues arising will fall outside the scope of the policy cover as this is not deemed to be Council business.

2 GENERAL PRINCIPLES (COMMUNICATIONS WITH THE MEDIA AND THE PUBLIC)

The Council's communications will be open and honest in dealing with the media.

In accordance with Standing Order No. 25, all requests from the press or other media, for an oral or written statement, or comment from the Council shall be processed in accordance with the Council's policy in respect of dealing with the press and/or other media.

- The purpose of press releases is to increase public awareness of the Parish Council's activities. All press releases must be written by the Clerk, who will, if appropriate, consult parish councillors individually, or the Parish Council as the corporate body.
- Proactive media releases will be issued to promote a decision or work of the Parish Council.
- Reactive press releases will be prepared and issued in response to a specific question or as a rebuttal to an article already published. Such statements should be dealt with in a timely manner.
- Information bulletins (which are posted on the website and notice-boards) will be used when it is necessary to provide vital information to the public very quickly; for example, the outcome of a specific planning application.
- Other press releases will report the decisions and outcomes of the Council's activities, and explain the reasons for them.
- The Clerk will be responsible for clearing all press reports, or comments to the media, in consultation with the Chairman of the Council or the Chairman of the relevant committee.
- The media will on occasions attempt to by-pass the Clerk; however, it is essential that all communications are co-ordinated and managed through the Clerk. Where parish councillors are contacted direct by the media, they should refer them to the Clerk.
- The Parish Council occasionally works with partners, mostly from the public sector, and in these circumstances, their contribution should be acknowledged.
- Press reports from the Parish Council, its committees or working groups shall, in general, be sent from the Clerk or via the reporter's own attendance at a meeting.

Communications Protocol

- In addition to the Clerk, the Chairman, or in his absence, the Vice-Chairman shall be authorised to speak to representatives of the media in respect of Parish Council matters, where specifically authorised so to do.
- Unless a Parish Councillor has been authorised by the Council to speak to the media on a particular issue, Parish Councillors who are asked for comment by the press should make it clear that any views they express are personal and request that this be clearly reported as their personal view.
- Unless a Parish Councillor is absolutely certain that he/she is reporting the view of the Council, they must make it clear to members of the public that they are expressing a personal view. The only clear way of being aware of the Council's view is if the matter has been discussed at a Parish Council meeting, and a decision made on that item.
- It should also be noted that on occasions, the most effective strategy is not to respond to the media.
- Press releases will not be used to comment on national political debates unless of specific relevance to this Parish Council.
- All media releases issued by the Council will include a quotation from the Chairman (or, in his absence, the Vice-Chairman); if it is not possible to contact the Chairman or Vice-Chairman, the Clerk will attribute a quotation to the Chairman.
- The Clerk will be the first point of contact for the media; however, where it is appropriate for an elected Member to represent the Parish Council, the Chairman or Vice-Chairman shall be authorised as the official spokesperson for the Council.
- Individual Members will not be permitted to issue media releases on behalf of the Parish Council.
- In the restricted period before an election, commonly known as "*purdah*" media releases will not include quotes from Members who are due for re-election; this is mainly of relevance to the Borough Council, but it is helpful for parish councillors to be mindful of the provision.
- Remember: One of the key principles of communication is to also communicate when there is nothing to report. Do not create a hiatus between one action and the next. Your audience needs to know the reasons for non-action.

3 PARISH COUNCIL CORRESPONDENCE

- The first point of contact for the Parish Council is the Clerk and it is to the Clerk that all correspondence for the Parish Council should be addressed. It is also the Clerk who issues all official correspondence in the name of the Parish Council, using Council letter-headed paper.
- The Clerk should deal with all correspondence following a meeting.
- No individual Parish Councillor should communicate direct with companies/individuals with which the Parish Council has a contractual relationship. All enquiries should be through the Clerk.
- No individual Parish Councillor should be the sole custodian of any correspondence or information in the name of the Parish Council (or its committees/sub-committees). In particular, Parish Councillors do not have a right to obtain confidential information/ documentation unless they can demonstrate a "need to know".
- Where correspondence from the Clerk to a Councillor is copied to another person, the addressee should be made aware that a copy is being forwarded to that other person.
- Correspondence sent on behalf of the Parish Council to the Borough Council shall also be copied to the three Ward Councillors.

4 PARISH COUNCILLOR CORRESPONDENCE WITH EXTERNAL PARTIES

The Clerk sends out the Council's correspondence to other bodies, and correspondence from individual Parish Councillors should be avoided; however, there may be exceptional situations when it is appropriate for a Parish Councillor to issue correspondence in his/her own name. Such correspondence must be authorised by the Parish Council and the correspondence must make it clear that it has been written in an official capacity and has been authorised.

5 AGENDAS FOR PARISH COUNCIL MEETINGS

In accordance with Paragraph 1 (4) (a) of the Public Bodies (Admission to Meetings) Act 1960, agendas will be published no later than 3 clear days before a meeting (this excludes the day of publication and the day of the meeting – Saturdays are included within this calculation).

Where the Clerk or a Parish Councillor wishes fellow councillors to receive matters 'for information only' in respect of items on the agenda, the Clerk should be copied in to the correspondence.

Note: This applies to items on the agenda only. Parish Councillors are entitled to share any other information they wish, with their colleagues. In these circumstances, it can be helpful for the Clerk to be copied in.

6 COMMUNICATION WITH STAFF

- The Council only employs one member of staff, the Clerk. Members and the Clerk need to be conscious of the employer/employee relationship and ensure that professional standards are maintained at all times.
- E-mails: Instant replies should not be expected as the Clerk's contracted hours are worked flexibly throughout the week Monday to Friday; any reasons for urgency should be stated.

7 COMMUNICATION BY E-MAIL (E-mail etiquette extracted from Debrett's)

E-mail has replaced many traditional forms of communication, both oral and written. The writer of an e-mail must remember that their message may be stored permanently, and that there is no such thing as confidentiality in cyberspace.

- Delicate communications should therefore be sent by other means, and the writer must think carefully before hitting 'send' if the message is written in haste or when emotions are running high.
- Avoid sarcasm and subtle humour unless you know that the reader will 'get it'. If in doubt, err towards the polite and formal, particularly where you are not well-acquainted with the recipient.
- Think carefully about using smiley faces, 'kisses' etc. Are these symbols really suitable for the recipient? They are certainly not business-like.
- Using capital letters in e-mail 'shouting' and should be avoided. Use sentence-case format. If you want to emphasise something, try underlining or using italics.
- Aim to stick as closely as possible to the conventions of traditional letter-writing. Close attention should be paid to spelling and grammar, and the habit of writing in lower case throughout should be avoided, particularly for proper nouns.
- A well thought-out subject line will ensure that the message gets the attention it deserves. Do not reply to such an e-mail on a different subject, without changing the subject-line as this causes confusion for the recipient who may well store e-mails in an electronic subject-folder.
- E-mails will often be printed and filed, and therefore close attention must be paid to layout. Again, treating the construction of an e-mail just as you would a 'real' letter is the most effective approach.
- Where there is more than one recipient, list them alphabetically or, in the business environment, according to hierarchy. This applies also to the 'cc' line.
- Take care when selecting 'reply to all'. Although the original e-mail might be suitable for all recipients, there are occasions when the reply is not. As an example, the Clerk might issue an

agenda and other accompanying documents to parish councillors and others, including the press. A councillor might wish to make a comment on the documents and whilst this would be appropriate for councillor colleagues, it might not be appropriate for the other recipients to see those comments.

- Blind copying (bcc) should be used with discernment; it is deceptive to the primary recipient. As an alternative, the e-mail should be forwarded on to the third party, with a short note explaining any confidentiality, after its distribution. If blind copying is essential; eg for a confidential document where all recipients must remain anonymous; then senders should address the e-mail to themselves, and everyone else as 'bcc' recipients.
- If you send an e-mail in error, contact the recipient immediately by telephone and ask them to ignore/delete the message.
- It is polite to reply to e-mails promptly; a simple acknowledgement with a promise that you will give the e-mail your full attention at a given later point is preferable to 'sitting on' the message.
- Never use e-mail to reply to correspondence or an invitation that was not sent by e-mail or does not supply an e-mail address as an RSVP option.
- The Clerk's communication with parish councillors is often crucial to the effective management of Parish Council business. Responses are not always required, but Members should respond if so requested.

8 SOCIAL MEDIA POLICY

Introduction

The use of social media is an increasingly popular communication tool. The Parish Council has already introduced Facebook. The following is intended to provide sufficient guidance to Members to enable them to avoid the 'pitfalls' which are well-publicised. This section will need to be updated when the new website is fully on-line.

People use the Internet to find everything from information about social events and shopping to making connections with friends. People expect to be able to comment and contribute on almost everything from on-line versions of newspapers to items they purchase from on-line retailers.

There is an increasing expectation that local government provides its services on-line with the same level of interactivity which they find everywhere else.

The problem for Councils is that by not engaging with social media, this can represent a greater risk than engaging. Residents of the parish will still use these networks to talk about the Council, whether or not it adds its own voice.

Legal matters to be considered

Defamation: This term covers libel (written) and slander (spoken) and relates to the publication of any untrue statement about a person which is damaging to their reputation, or by making oral comments in an unguarded moment. This also applies if someone is allowed to publish something libellous on the Parish Council's website. If the Parish Council is aware of it and does not take prompt action to remove it, a successful libel claim against the Parish Council will result in an award of damages against the Council.

Data Protection: Avoid publishing the personal data of individuals unless their written permission has been obtained.

Bias and Pre-determination

The Localism Act 2011 sought to remove the concept of pre-determination but it still exists. Although the Parish Council is only a consultee on planning applications, rather than the determining body, it is wise to avoid publishing anything which might suggest that Members do not

have an open mind on these matters. The much-quoted example of pre-determination is “over my dead body!”

Copyright

Placing images or text on the website, from a copy-righted source without permission is likely to breach copyright. Avoid publishing anything unless permission has been granted. Breach of copyright may result in an award of damages against the Parish Council.

Obscene Material. This is a criminal offence and the term ‘obscene’ is defined in S.1 of The Obscene Publications Acts 1959.

Party Political Material:

The Parish Council is apolitical, but it is worth noting that party-political material is a misuse of the Parish Council’s website. There should be no material included which attempts to persuade the public to a particular view.

Code of Conduct Implications:

Councillors can have blurred identities; they may have a social media account on which they comment as both an individual and a councillor. It must at all times be made clear whether councillors are posting as an individual or in their capacity as a councillor.

‘Do’s and Don’ts’ in your capacity as a councillor

- ◆ Refrain from posting controversial or potentially inflammatory remarks. Language which could be deemed as offensive, especially in respect of race, sexuality, disability etc. should not be published on any social media website.
- ◆ Avoid personal attack, on-line fights and hostile communications.
- ◆ Never use an individual’s name unless you have written permission.
- ◆ Be careful what you say and who is likely to overhear it, to avoid potentially slanderous statements.
- ◆ Respect the privacy of other councillors and residents.
- ◆ Be aware not to publish anything which violates laws or regulations.

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Research Sources:

- Governance Toolkit for Parish and Town Councils (published jointly by the Association of Council Secretaries and Solicitors, Society of Local Council Clerks, Standards for England, the National Association of Local Councils and the Local Government Association.
- National Code for Recommended Practice on Local Authority Publicity 2001.
- Connected Councillors – a guide to using social media to support local leadership, published by I&DeA
- Cheshire East Council’s “Social Media Handbook for Councillors”
- Cheshire Association of Local Councils “Do’s and Don’ts of Social Media”