



PITSTONE PARISH COUNCIL

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Social Media & Communications Policy

Statement of Purpose

Social media

The widespread availability and use of social networking applications bring opportunities to understand, engage and communicate with our audiences in new ways. It is important that the Council is able to use these technologies and services effectively and flexibly. However, it is also important to ensure that the Council balance this with its duties to its services users and partners, its legal responsibilities and its reputation.

For example, the Council's use of social networking and online applications has implications for its duty to safeguard children, young people and vulnerable adults.

The policy requirements in this document aim to provide this balance to support innovation whilst providing a framework of good practice.

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 our users are able to clearly distinguish where information provided via social networking applications is legitimately representative of the Council.

Traditional communications

The Parish Council will also continue to communicate and interact with residents via a number of traditional channels as well, including:

- the publication of Pitstone Parish Post village magazine, a number of times throughout the year
- by displaying posters and notices on the 6 notice-boards we own around the village
- via specific door-to-door leaflet drops where appropriate
- by welcoming contact from residents (to either councillors or clerk) via whichever method residents prefer
- by welcoming residents to our meetings and committee meetings
- via paper surveys and electronic surveys
- with general correspondence etc

As is the case with communications that are undertaken via social media channels, it is important to minimise the legal, governance and reputational risks to which the Parish Council is subject when using more traditional means of communication such as email, printed

material and/or the spoken word. It is also vital, given the wide variety of sensitive matters it can be called upon to deal with, that recipients of any communication from the Parish Council (or which might reasonably be perceived as being from the Parish Council), are made specifically aware of the capacity in which any such communication is being sent.

Application of this policy

This policy applies primarily to the Parish Council, although elements may be utilised by the Recreation Ground Charity and Pitstone Parish Charity where appropriate.

Scope

This policy covers the use of social networking applications and other methods of communication by Council employees, Elected Members, and by partners or other third parties (including contractors and volunteers and co-opted working party members) who are, or who might reasonably be perceived to be, acting on behalf of the Council. These groups are referred to collectively as 'councillors' for brevity.

The requirements of this policy apply to all uses of social networking applications and other communication channels which are, or which might reasonably be perceived as being, used for any Council-related purpose (and regardless of whether the applications are hosted corporately or not). They must also be considered where councillors are contributing, whether or not in an official capacity, to social networking applications provided by external organisations.

Social networking applications include, but are not limited to:

- Blogs
- Online discussion forums
- Collaborative spaces
- Media sharing services, for example YouTube
- 'Micro-blogging' applications, for example Twitter.

Many of the principles of this policy also apply to other types of online presence such as virtual worlds and RSS aggregation services and the use of these services should also be discussed with the Parish Clerk.

All councillors should bear in mind that information they share through social networking applications, even if they are on private spaces, are still subject to copyright, data protection and Freedom of Information legislation, the Safeguarding Vulnerable Groups Act 2006 and other legislation. Furthermore, should any legal action ever be taken against the Parish Council, then messages that have been issued under social media, email, etc., can be 'called in' (i.e. their disclosure can be compelled, however privately they might have been sent) so extreme care is always required with the content of such messages. Councillors must also operate in line with the Council's Equal Opportunities Policy.

Use of social networking applications in work time for personal use only is not addressed by this policy.

This policy is based on the Civil Service Code: Principles for Participation Online and advice produced by the Chartered Institute of Public Relations and other sources of good practice.

Enforcement

Any breach of the terms set out below could result in the application or offending content being removed in accordance with the published complaints procedure and the publishing rights of the responsible councillors being suspended.

The Clerk reserves the right to require the closure of any applications or removal of content published by councillors which may adversely affect the reputation of the Council or put it at risk of legal action.

Any communications or content you publish that causes damage to the Council, any of its employees or any third party's reputation may amount to misconduct or gross misconduct to which the Council's Disciplinary Policy applies.

Policy

All proposals for using social networking applications as part of a Council service (whether they are hosted by the Council or by a third party) must be approved by the Parish Council first. Use of social networking applications which are not related to any Council services (for example, contributing to a wiki provided by a professional association) does not need to be approved by the Clerk. However, councillors must still operate in line with the requirements set out below.

Councillors must adhere to the following Terms of Use. The Terms of Use below apply to all uses of social networking applications by all councillors. This includes, but is not limited to, public-facing applications such as open discussion forums and internally-facing uses such as project blogs regardless of whether they are hosted on corporate networks or not.

Where applications allow the posting of messages online, users must be mindful that the right to freedom of expression attaches only to lawful conduct. The Council expects that users of social networking applications will always exercise the right of freedom of expression with due consideration for the rights of others and strictly in accordance with these Terms of Use.

Terms of Use

Communications including social networking applications:

1. must not be used to publish any content which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claims for damages. This includes but is not limited to material of an illegal, sexual or offensive nature that may bring the Council into disrepute.
2. must not be used in an abusive or hateful manner.
3. must not be used for actions that would put councillors in breach of ~~Council codes~~ of conduct or ~~policies~~ relating to Elected Members or staff.
4. must not breach the Council's Equal Opportunities or Bullying and Harassment policies.
5. official Council profiles and pages must not be used for party political purposes or specific campaigning purposes as the Council is not permitted to publish material which 'in whole or part appears to affect public support for a political party' (LGA 1986).
6. official Council profiles and pages must not be used for the promotion of personal financial interests or personal campaigns.
7. official Council profiles and pages must not be used for the promotion of commercial ventures.

Where individuals, including those from partner organisations and other volunteers, are involved and are acting on behalf of the Council, they will also be expected to comply with the relevant Council policies.

It is also important to ensure that members of the public and other users of online services know when a social networking application is being used for official Council purposes. To assist with this, all councillors must adhere to the following requirements:

1. Officers must only use the official communication addresses of [@pitstone_pc](https://twitter.com/pitstone_pc) or parishclerk@pitstone.co.uk or www.pitstone.co.uk (or that of their own reputable organisation if they are not employed by the Council) for official Council purposes;
2. Only the Parish Clerk should post to the Council's official communication channels or issue official correspondence etc;
3. Where social networking applications are being managed by councillors, appropriate feedback and complaints information must be provided to other council members if requested;
4. The use of the Council's logo and other branding elements should be used where appropriate to indicate the Council's support. The logo should not be used on social networking applications which are unrelated to or are not representative of the Council's official position.
5. Councillors should identify themselves as such where appropriate on social networking applications. For example, through providing additional information in user profiles.
6. Councillors should ensure that any contributions they make are professional and uphold the reputation of the Council.
7. Members, if using their own social media account profiles (or when communicating via any traditional means), must ensure that they are, and are seen to be, either speaking in a personal capacity or simply providing details of works undertaken or policies agreed by Pitstone Parish Council and not speaking on behalf of the Council.

All users need to be aware that applications may be closed for a defined period before local and national elections in order to comply with legislation which affects local authorities.

Communications by Council and by councillors

As a public and publicly-accountable body, the workings of the Parish Council must be, and must be seen to be, transparent. Equally, the matters that the Parish Council are called upon to deal with can be and often are sensitive or private, and the detail of such matters must accordingly be kept confidential by councillors.

The Parish Council is subject to the same legal requirements as both trading companies and the general public with regards to data protection, copyright, defamation, bullying and harassment and, in fact, 'the law of the land' generally. Furthermore, third parties who deal with the Parish Council have a proper expectation that the council as a corporate body (and councillors individually) will respect the confidentiality both of the terms of their dealings with the Parish Council, and of any additional information imparted about their business or affairs generally during the course of such dealings.

The general rule-of-thumb is accordingly that anything dealt with by the Parish Council must be treated as confidential, save to the extent that it is properly discussed in, or reported at, or minuted as having been considered during, the 'open' element of any Parish Council meeting.

In addition, the reputation and propriety of a public and publicly-accountable body such as the Parish Council (and of individual councillors) must be beyond reproach at all times. It is also therefore necessary to ensure that any formal communications by and with the Parish Council are made only via the proper channels, and that other communications which are not from the Parish Council are not portrayed – and could not reasonably be perceived – to be coming from it.

What this means in practice is as follows:

Conduct when communicating with members of the public or with other organisations

1. No individual or group of councillors has the power to speak for the Parish Council, or commit it to a particular viewpoint or course of action. The point-of-contact for the Parish Council is the Clerk, and – unless specific authorisation to the contrary has been given by the Clerk – it is via him or her (only) that communications may be sent to, or issued by, the Parish Council. This reflects the requirements of the 1972 Local Government Act which bestow upon the corporate body of the parish council the powers to fulfil its functions, and which require the appointment of a clerk as the conduit for so doing.
2. When communicating with any third party on a matter that relates (or which might reasonably be perceived as relating) to the business of the Parish Council, all councillors must make it clear that they are writing or speaking in their personal capacity and are not committing, and cannot commit, the Parish Council to any particular course of action, decision or viewpoint. Furthermore, nothing said or done by any councillors must convey the impression that the individual in question is in any way representing the views of the Parish Council on any particular matter.
3. Councillors may however, by way of exception to paragraphs 1 and 2 above, provide to third parties details of works undertaken or policies agreed by the Parish Council, albeit only to the extent that those matters are not required to be treated as confidential by the other provisions of this policy.
4. Irrespective of paragraphs 1 to 3 above, and whether or not it has been the subject of a decision by the Parish Council, any matter which is deemed by the Clerk or the Chairman to be of an especially sensitive nature shall be subject to further restriction, namely that councillors will not (even in their personal capacity) be permitted to communicate with any third party about the matter in question. Instead, councillors must if asked merely indicate that they are unable to comment, and refer any questions or communications about such matter to the Clerk who will, if appropriate, formulate a response on behalf of the Parish Council.

Confidentiality

1. Any matter that is being dealt with by the Parish Council must be treated as confidential, save to the extent that it is properly discussed in, or reported at, or minuted as having been considered during, the 'open' element of any Parish Council meeting.
2. Any communications between councillors that relate to Parish Council business shall not – unless specifically authorised by the Clerk – be copied, blind-copied, forwarded or otherwise shared in any way with any third parties.
3. Any communication relating to Parish Council business, that takes place with councillors who have other interests in the matter in question, shall be received by such councillors on the basis that the communication relates only to the business of the Parish Council; and that communication may not be disclosed to the other party which is interested in the matter in question (or, indeed, to any third party which is not). For the avoidance of doubt the provisions of section 4 of the Code of Conduct regarding the involvement of otherwise-interested councillors shall apply equally to closed sessions as to open ones.
4. Discussions which take place at those parts of Parish Council meetings which are not open to the general public shall remain confidential, and shall not be disclosed by any councillors to any third party outside the confines of the meeting concerned. Prior to the commencement of any closed session all councillors present must reaffirm, in writing if required by the Clerk or Chairman, that in accordance with section 2 of the Code of Conduct they will respect the confidentiality of information received and of the discussions which are to take place in that session. The Clerk may minute and report to third parties

any decision taken in closed session, in the same way that such decision would have been minuted and reported had it taken place in an open meeting.

General Guidelines for Conduct

- Council should avoid getting drawn into debate or argument, especially online. State the Parish Council position clearly once and then withdraw from any ongoing debate.
- Councillors should consider all electronic posts carefully before issuing – the golden rule being that if you have to think about it, or it might be misinterpreted etc, then don't post it. Posts should be factual and positive. The same principle applies to any other form of electronic, written or verbal communication undertaken by councillors.
- Everyone is entitled to their point of view and the Parish Council welcomes constructive criticism as well as positive feedback. However, bullying/ harassment/ trolling towards individual councillors will not be tolerated and individual members reserve the right to take appropriate action. Where this is directed via the Council's official electronic channels, the Parish Council reserves the right to respond once with a clear statement of its position and then to refrain from entering further debate.
- Councillors should remember that any time they are discussing Parish Council business, they must make it clear whether they are doing so as an individual or, for the limited purposes for which this is permissible, as a councillor.

Review

This Social Media and Communications Policy was adopted by Pitstone Parish Council on minute reference and will be reviewed on at least an annual basis.

Signed on behalf of Pitstone Parish Council by:

Chairman