

# PITSTONE PARISH COUNCIL

## Social Media and Communications Policy

### 1. Purpose

#### 1.1. Digital and social media

The use of digital/social media and electronic communication enables the Parish 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.

The Parish Council has a website, Facebook Page, Facebook Group for the youth café, Twitter account and uses email to communicate. We use these channels to provide information and updates regarding activities and opportunities within our parish and promote our community positively.

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 can 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 can clearly distinguish where information provided via social networking applications is legitimately representative of the Council.

#### 1.2. Traditional communications

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

- the publication of Pitstone Parish Post village magazine, several times throughout the year
- by displaying posters and notices on the 7 noticeboards 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.

## **2. 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.

## **3. Scope**

This policy covers the use of social networking applications and other methods of communication by Council employees, Elected (or co-opted) 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.

As more and more information become available at the press of a button, it is vital that all information is treated sensitively and securely. Councillors are expected to maintain an awareness of the confidentiality of information that they have access to, and not to share confidential information with anyone. All councillors should bear in mind that any 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.

#### **4. 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 and/or a breach of the Council's Code of Conduct and will be dealt with through its prescribed procedures (at the extreme it may also involve a criminal investigation).

#### **5. 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.

#### **6. 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.
- Will not be used for the dissemination of political advertising.
- If it is official Council business, it will be moderated by either the Chair of the Council or the Clerk to the Council.

## 7. Guidance for residents interacting with the Parish Council

To ensure that all discussions on the Council digital/social media pages are productive, respectful, and consistent with the Council's aims and objectives, we ask you to follow these guidelines:

- Be considerate and respectful of others. Vulgar, threats or abuse of language will not be tolerated.
- Differing opinions and discussion of diverse ideas are encouraged, but personal attacks on anyone, including the Council members or staff, will not be permitted.
- Share freely and be generous with official Council posts but be aware of copyright laws; be accurate and give credit where credit is due.
- Stay on topic.
- Refrain from using the Council's Facebook page or Twitter site for commercial purposes or to advertise, market or sell products.

Our sites are not monitored 24/7 and we will not always be able to reply individually to all messages or comments received. However, we will endeavour to ensure that any emerging themes or helpful suggestions are passed to the relevant people or authorities. Please do not include personal/private information in your social media posts to us.

Sending a message/post via Facebook or Twitter will not be considered as contacting the Council for official purposes and we will not be obliged to monitor or respond to requests for information through these channels. Instead, please make direct contact with the council's Clerk and/or members of the council by emailing or writing.

We retain the right to remove comments or content that includes:

- Obscene or racist content
- Personal attacks, insults, or threatening language
- Potentially libellous statements
- Plagiarised material, any material in violation of any laws, including copyright
- Private, personal information published without consent
- Information or links unrelated to the content of the forum
- Commercial promotions or spam
- Alleges a breach of a Council's policy or the law

The Council's response to any communication received not meeting the above criteria will be to either ignore, inform the sender of our policy, or send a brief response as appropriate. This will be at the Council's discretion based on the message received, given our limited resources available. Any information posted on our pages not in line with the above criteria will be removed as quickly as practically possible. Repeat offenders will be blocked. The Council may post a statement that 'A post breaching the Council's Social Media Policy has been removed'. If the post alleges a breach of a Council's policy or the law the person who posted it will be asked to submit a formal complaint to the Council or report the matter to the Police as soon as possible to allow due process.

## **8. Parish Council website**

Where necessary, we may direct those contacting us to our website to see the required information, or we may forward their question to one/more of our Councillors for consideration and response. We may not respond to every comment we receive particularly if we are experiencing a heavy workload.

The Council may, at its discretion, allow and enable approved local groups to have and maintain a presence on its website for the purpose of presenting information about the group's activities. The local group would be responsible for maintaining the content and ensuring that it meets the Council's 'rules and expectation' for the web site. The Council reserves the right to remove any or all of a local group's information from the web site if it feels that the content does not meet the Council's 'rules and expectation' for its website. Where content on the website is maintained by a local group it should be clearly marked that such content is not the direct responsibility of the Council.

## **9. Parish Council email**

The Clerk to the council has their own council email address ([parishclerk@pitstone.co.uk](mailto:parishclerk@pitstone.co.uk))

The email account is monitored mainly between 9am and 3pm, Monday to Friday, and we aim to reply to all questions sent as soon as we can.

The Clerk is responsible for dealing with email received and passing on any relevant mail to members or external agencies for information and/or action. All communications on behalf of the Council will come from the Clerk, and/or otherwise will always be copied to the Clerk. All new Emails requiring data to be passed on, will be followed up with a Data Consent Form for completion before action is taken with that correspondence.

Individual Councillors are at liberty to communicate directly with parishioners in relation to their own personal views, if appropriate, copy to the Clerk. NB any emails copied to the Clerk become official and will be subject to The Freedom of Information Act.

These procedures will ensure that a complete and proper record of all correspondence is kept. Do not forward personal information on to other people or groups outside of the Council, this includes names, addresses, email, IP addresses and cookie identifiers.

## **10. SMS (texting)**

Members and the Clerk may use SMS as a convenient way to communicate at times. All are reminded that this policy also applies to such messages.

## **11. Video Conferencing e.g. Skype/Zoom/Teams**

If this medium is used to communicate, please note that this policy also applies to the use of video conferencing

## **12. Council/Councillors terms of use**

Communications including social networking applications:

- 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.

- must not be used in an abusive or hateful manner.
- 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.
- must not breach the Council's Equal Opportunities or Bullying and Harassment policies.
- 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).
- official Council profiles and pages must not be used for the promotion of personal financial interests or personal campaigns.
- 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:

- Officers must only use the official communication addresses of [@pitstonepc.org](mailto:@pitstonepc.org) or [parishclerk@pitstone.co.uk](mailto:parishclerk@pitstone.co.uk) or [www.pitstone.co.uk](http://www.pitstone.co.uk) (or that of their own reputable organisation if they are not employed by the Council) for official Council purposes.
- Only the Parish Clerk should post to the Council's official communication channels or issue official correspondence etc.
- Where social networking applications are being managed by councillors, appropriate feedback and complaints information must be provided to other council members if requested.
- 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.
- Councillors should identify themselves as such where appropriate on social networking applications. For example, through providing additional information in user profiles.
- Councillors should ensure that any contributions they make are professional and uphold the reputation of the Council.
- 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.
- Councillors should be careful only to cc essential recipients on emails ie to avoid the use of the 'reply to all' option if possible and ensure that email trails have been removed but do copy in all who need to know.

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

### **13. 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 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 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 always beyond reproach. 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:

#### **13.1. Conduct when communicating with members of the public or with other organisations**

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.

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 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 matter.

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.

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 to 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.

### **13.2. Confidentiality**

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.

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.

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.

Discussions which take place at those parts of Parish Council meetings which are not open to the 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 at the meeting 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.

## **14. 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.

**15. Review**

This policy was adopted by Pitstone Parish Council on .....31/8/23.....

minute reference .....142/23..... and will be reviewed on at least an annual basis.

Signed on behalf of Pitstone Parish Council by:

*D Nicholls*

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Chairman