

COMMUNICATIONS POLICY

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1 Introduction

- 1.1 Diss Town Council is committed to active community engagement through a wide range of channels, including online and social media.
- 1.2 The Council is committed to the provision of accurate information in respect of its functions, decisions and actions. Accordingly, great care needs to be taken when addressing communications within the Town Council and with outside bodies.
- 1.3 The aim of this Policy is to set out a Code of Practice to provide guidance to staff and councillors about the use of media such as e-mails, blogs, social networking sites, podcasts, forums, messages boards or comments on web articles such as Twitter, Facebook, Instagram, LinkedIn and other relevant social media websites.

2 Aim

- 2.1 The aim of this Policy is to ensure:
 - 2.1.1 Engagement with individuals and communities and successful promotion of Council based services through the use of all media formats;
 - 2.1.2 A consistent approach is adopted and maintained on behalf of Diss Town Council;
 - 2.1.3 That Council information remains secure and is not compromised through the use of social and online media;
 - 2.1.4 That users operate within existing policies, guidelines and relevant legislation;

2.1.5 That the Council's reputation is upheld and improved rather than adversely affected;

2.1.6 That communication is effective, timely, appropriate, useful, engages with a wider audience and utilises cross-promotion of other Council communication tools (e.g. website, newsletter, linking Facebook to Twitter account etc).

3 Scope

3.1 This policy covers all individuals working at all levels within the Council, including all elected and co-opted councillors, the Clerk to the Council and all other employees and volunteers. For ease, the word 'personnel' may be used as a collective term in this document.

3.2 It is also intended for guidance for others communicating with the Town Council.

3.3 This policy supplements and should be read in conjunction with all other policies and procedures adopted by the Council such as the Privacy policy, Disciplinary Procedure, Members' Code of Conduct, the Computer, Email and Internet policy and Data Protection policy. The Council's policy handbook is available at <https://www.diss.gov.uk/about-us>.

3.4 This policy does not form part of any contract of employment and it may be amended at any time.

3.5 The policy covers all of the Council's online media channels, which are currently:

3.5.1 www.diss.gov.uk – website.

3.5.2 E-mail addresses linked to the diss.gov.uk domain name.

3.5.3 Facebook - [@DissTC](https://www.facebook.com/DissTC)

3.5.4 Twitter - [@DissTownCouncil](https://twitter.com/DissTownCouncil)

3.5.5 Instagram – [@disstowncouncil](https://www.instagram.com/disstowncouncil)

3.6 Over time the Town Council may add to the channels of communication that it uses as it seeks to improve and expand the services it delivers. When these changes occur, this policy may be updated to reflect the new arrangements that it uses to communicate with people who live in, work in and visit Diss. The Council will always try to use the most effective channel for its communications.

3.7 The use of new media channels will not replace existing forms of communication. The website and other forms of social media will be used to enhance communication.

4 Legal Obligations

4.1 The Freedom of Information Act 2000 and GDPR applies to public bodies. The FOI Act allows members of the public to request information from the Town Council which must be treated in accordance with GDPR.

4.2 Town Council information is held by Town Council administrators and some is held by Town Councillors, although the length of time that information is held by councillors will not be subject to the Town Council's retention and destruction policies.

4.3 Town Council information held by councillors is subject to the FOI Act and must be made available if requested in accordance with the FOI Act and GDPR.

- 4.4 As Data Controllers of personal data (as defined by GDPR), councils must ensure the confidentiality, integrity and availability of all personal data they hold, even if the data is being processed through personal email accounts or is stored on a privately-owned device.
- 4.5 Personnel must not send, receive or disseminate proprietary data or any confidential information belonging to Diss Town Council to or from a third party unless authorised.
- 4.6 Permission to publish photographs or videos on social media sites should be sought from the persons, parent / guardian or organisations in the video or photograph before being uploaded.

5 E-mails

- 5.1 Personnel will be provided with a dedicated diss.gov.uk e-mail address upon their appointment to a position within the Council (including councillors). Access to e-mail accounts will be removed as soon as a relationship with the Council ceases.
- 5.2 These email addresses can be accessed by members of the public via the Town Council website.
- 5.3 Individuals are responsible for what they post or send. Personnel are personally responsible for any online activity conducted via e-mail addresses linked to the diss.gov.uk domain name.
- 5.4 Personnel are restricted to ensuring use of these accounts is for the proper performance of their Council related duties only. These accounts should be the only ones used by personnel in relation to their Council related duties.
- 5.5 Town Council email addresses should not be used by anyone other than the Town Councillor to whom the Town Council email address has been assigned.
- 5.6 Any official Town Council business held by councillors in their own private email accounts is still subject to the Freedom of Information Act and therefore the individual account can be searched for requested information. Deleting or concealing information with the intention of preventing its disclosure following receipt of an FOI request is a criminal offence under section 77 of the FOI Act and the person concealing the information is liable to prosecution.
- 5.7 The use of email to exchange correspondence requires the same professional standards as other forms of communication. You should not send or forward mail which is defamatory or offensive for whatever reason.
- 5.8 The Council will audit and monitor use of the systems to ensure proper and effective business use. Privacy should not be expected in the use of Council email facilities. All email is stored and the Council may inspect an email (including personal emails) at any time.
- 5.9 No account details may be changed without first informing the Town Clerk.
- 5.10 Councillors and staff are not permitted to debate matters of council business by e-mail. The correct procedure is for the debate to take place at a public meeting.

- 5.11 Junk mail is a hazard of internet life and efforts should be made to isolate it at source, if not it should be deleted immediately, and no attachments should be opened. It is important to keep virus protection up to date.
- 5.12 In order to protect from viruses, email attachments which might contain macros (word processor and spreadsheet files) or applications, should not be opened if they are from a sender whom you do not recognise, simply delete.
- 5.13 Be aware that agreements made by email have the same status as letters or formal contracts. The Clerk has the sole authority to purchase or acquire goods or services on behalf of the Council via email.
- 5.14 Email inboxes must be checked regularly to ascertain all correspondence within that system.
- 5.15 Arrangements must be made to ensure that inboxes are checked during times of absence due to holiday or sickness.
- 5.16 It is recommended that e-mails are retained for no more than twenty-four months before they are deleted. Those containing important material should be saved to a separate folder.

6 Email Etiquette

- 6.1 Email is not always the best way to communicate information as email messages can often be misunderstood and the volume of email messages people receive can be prohibitive to receiving a meaningful reply as a result of email overload.
- 6.2 The Clerk and Councillors have the responsibility of deciding whether email is the most appropriate form of communication and should consider the following factors before sending an email:
 - 6.2.1 The Subject - some subjects are too sensitive to be sent via email, e.g. employee information. Careful consideration needs to be given as it is the responsibility of the sender to decide whether or not email is the most appropriate vehicle for communication in these circumstances.
 - 6.2.2 Speed of Transmission - where information is needed to be communicated urgently and the recipient is expecting it then this is fine, however, if an urgent message needs to be sent and the recipient(s) is/are not expecting anything, then it is probably better to use the phone.
 - 6.2.3 Speed of Response - there is no guarantee that an email will be read as soon as it is sent; if the email requires immediate action, then this is probably not the best way to communicate. A read receipt may be used to help people who need a quick response, to note that the mail has been read. Instant replies should not be expected; reasons for urgency should be stated.
 - 6.2.4 Number of Recipients - do not necessarily use reply all as not everyone in the previous communication necessarily needs to receive the email.
- 6.3 When writing an email, it is important to compose the message with the same care and clarity applied to drafting letters and memos, particularly as emails form part of the corporate record under the Data Protection and Freedom of Information Acts.
- 6.4 Information and documents sent to your @diss.gov.uk inbox if distributed further must

be sent from the same email address.

- 6.5 E-mails that are sent to external addresses should include the Council's standard disclaimer and signature format. Always ensure you include your name including the title Cllr and role if appropriate e.g., Town Mayor, Chairman of X Committee, the Town Council Website Address and the disclaimer as shown in the example below:

Cllr Eric Taylor (Town Mayor)
Diss Town Council
www.diss.gov.uk

This email and any files transmitted with it are confidential and may be legally privileged and are intended solely for the use of the individual or entity to whom that they are addressed. If you are not the intended recipient, any use, disclosure, copying or forwarding of this email and/or its attachments is unauthorised. If you have received this email by mistake please notify the sender immediately before deleting it.

- 6.6 Always ensure that your Recipient List is appropriate to avoid causing a nuisance to other colleagues.
- 6.7 Email to multiple addresses outside Diss Town Council should be sent as blind copy, (bcc). Messages sent to groups of people must be relevant to all concerned.
- 6.8 Always complete the Subject Line with a clear description of what the email is about as recipients cannot always distinguish between what they need to look at immediately and what can wait. For example, Full Council minutes March 2022 for approval.
- 6.9 Ensure language is simple, unambiguous and to the point.
- 6.10 Avoid using abbreviations and emoticons. Be aware that other colleagues may not know the meaning of informal expressions, such as FWIW (for what it's worth).
- 6.11 Be polite. Terseness can be misinterpreted. Please and thank you go a long way.
- 6.12 Keep the tone of your comments respectful and informative, never condescending or "loud." Use sentence case format, not capital letters, or write in red to emphasis points.
- 6.13 Avoid personal attacks, online fights and hostile communications.
- 6.14 Be patient. Not everyone can respond immediately or necessarily have the confidence to communicate using email.
- 6.15 Never reply in anger. Take a break or sleep on it before responding.
- 6.16 Don't conduct an argument on email - it is unprofessional.
- 6.17 Never 'flame' anyone. A flame is an electronic verbal attack. If a flame is received, then please do not respond in anger as this may be regretted later. Users should not engage in exchanging flames and create a 'flame- war'.
- 6.18 Spell and grammar check everything. Correct any errors promptly.

- 6.19 Always, always read email before sending it and consider the resultant reaction. Ensuring clarity in the message is time well spent.
- 6.20 Be mindful of the information you post on sites and make sure personal opinions are not published as being that of the Council, bring the Council into disrepute or are contrary to the Council's Code of Conduct and other policies.
- 6.21 Respect the privacy of other councillors and residents. Do not disclose confidential matters or criticise Council policies or personnel.
- 6.22 Residents and councillors should note that not all communications require a response.
- 6.23 There will not always be immediate responses to communications as they may be discussed at a meeting so that a response can be agreed by the Town Council. When this is necessary the item will be placed on the next available agenda. Any response will then be included in the minutes of the meeting.
- 6.24 Personnel are expected to refrain from creating unnecessary email congestion by sending messages of a trivial nature.
- 6.25 Users are required to use Out of Office replies within the email system to inform senders of email of absence and expected return to work date and including an alternative contact is helpful.

7 Social Media

- 7.1 The Town Clerk is the designated 'Council' owner of social media channels agreed by the Council and will be an administrator / moderator on all accounts.
- 7.2 Other personnel officially appointed by the Council may assist the Town Clerk to disseminate information. However, all must ensure they follow this policy.
- 7.3 No account details may be changed without first informing the Town Clerk.
- 7.4 Individual councillors are at liberty to set up their own social media accounts but they should ensure they comply with this policy and ensure that a 'personal view' disclaimer is used.
- 7.5 All social media sites used should be checked and updated on a regular basis to ensure that the security settings are in place.
- 7.6 The nominated moderator or moderators shall remove any negative posts which may contain personal and inflammatory remarks, libellous or defamatory information without further comment or notification. Such posts will also be reported to the Hosts (i.e. Facebook / Twitter).

8 Personal Safety & Privacy

- 8.1 Personnel should be aware that the information they post on their personal social media profile can make them identifiable to service users, as well as people they know in a private capacity.
- 8.2 Online sites such as Facebook are in the public domain, and personal profile details can be seen by anyone, even if users have their privacy settings on the highest level.

Also if a user's profile is linked to other sites, any changes to their profile will updated there too.

- 8.3 Personnel who have set their privacy level to the maximum can have their privacy compromised by 'friends' who may not have set their security to the same standard.

9 Communication with the Media

- 9.1 The Town Clerk or Officers authorised by the Town Clerk, Council Leader, Town Mayor and Chairmen of committees are authorised to respond to approaches from the media provided that the statements reflect the Council's opinion and that they are matters pertaining to their remit within the committee terms of reference and roles and responsibilities documents. If an enquiry is received regarding a matter outside of the role's remit, please direct the enquirer to the appropriate member or Officer. This will help to ensure that the principles in the Government's Code of Recommended Practice on Local Authority Publicity are adhered to.
- 9.2 Town Council staff who are directly approached by the media should not attempt to answer questions themselves and should refer the enquiry to the Town Clerk.
- 9.3 The Council should not pass comments on leaks, anonymous allegations or allegations about individual staff and members.
- 9.4 The phrase "no comment" should not be used as a response to a media enquiry. The Council is open and accountable and should always explain if there is a reason why it cannot answer a specific enquiry.

10 Council Press Releases

- 10.1 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.
- 10.2 Any Officer or Member may draft a press release however they must be approved by the Town Clerk in order to ensure that the principles outlined in the Code are adhered to, that there is consistency of style across the Council and that the use of the press release can be monitored.
- 10.3 Official Council releases will follow a corporate style appropriate for the media being targeted and a central record will be maintained.
- 10.4 All releases will accurately reflect the corporate view of the Council, contain relevant facts and may include an approved quotation from an appropriate councillor.
- 10.5 Releases will not promote the views of specific political groups, publicise the activities of individual councillors, identify a member's political party or persuade the general public to hold a particular view.
- 10.6 All official Council releases will be placed on the Council's website.

11 Councillor Press Releases

- 11.1 Councillor press releases are personal and are written and issued by the councillor responsible.

- 11.2 This type of release may or may not be political and should not include the name of any Officer, use the Council logo or the Council telephone number as a point of contact.
- 11.3 Members may not hold themselves out to be acting on behalf of the Town Council and must not communicate as councillor in any other matter than in their official capacity.
- 11.4 Councillors are not permitted to use the title “councillor” in their private capacity.
- 11.5 It would be beneficial for copies of intended releases to be provided to the Clerk. Councillors seeking advice can contact the Clerk.

NOTE: Members should be aware that case law states that the role of councillor overrides the right to act as an individual. This means that councillors should be careful when expressing individual views to the news media. Councillors also have an obligation to respect Council policy once made, while it may be legitimate for a councillor to make it clear that he or she disagreed with a policy and voted against it (if this took place in open session), they should not seek to undermine a decision through the news media.

12 Inappropriate Use

- 12.1 Users must not use online platforms to abuse or inflame others or to harass or threaten anyone. Responding to abuse, harassment or threatening will not be accepted as an excuse for inappropriate language and/or behaviour.
- 12.2 Recipients of abusive or threatening content related to the business of the Council must immediately inform the Clerk, Council Leader or Mayor.
- 12.3 Users must not send or post content containing obscene, abusive or profane language.
- 12.4 Users must not forward emails or attachments without being assured that the information can be passed on.
- 12.5 Users must not publicise the content of email that contain confidential information.
- 12.6 Users must not send emails to Town Council staff, fellow councillors or members of the public that are condescending in nature.
- 12.7 Users must not send, access, display, download, copy or circulate information containing stories, jokes or anecdotes that contain:
 - 12.7.1 pornography or sexually orientated images;
 - 12.7.2 gambling;
 - 12.7.3 gaming (playing computer games);
 - 12.7.4 promotion of unlawful discrimination of any kind;
 - 12.7.5 promotion of racial or religious hatred;
 - 12.7.6 threats including the promotion of violence;
 - 12.7.7 fraudulent or illegal material promotion of illegal and/or unlawful acts;
 - 12.7.8 information considered to be offensive, inappropriate or disrespectful to others;
 - 12.7.9 unauthorised and copyrighted material including music.
- 12.8 Diss Town Council will report to the police all known incidents in which users intentionally send or receive content containing the following:
 - 12.8.1 images of child pornography or child abuse (i.e. images where children are or appear to be under the age of 16 and are involved in sexual activities or posed

- to be sexually provocative);
 - 12.8.2 adult material/pornography that breaches the Obscene Publications Acts (1959 & 1964);
 - 12.8.3 criminally racist material.
- 12.9 The above examples are not a definitive list of the misuse of social media but are examples to illustrate what misuse may look like.
- 12.10 Councillors or residents who have any concerns regarding content in e-mails or placed on social media sites should report them to the Town Clerk.
- 12.11 If inappropriate material is accessed accidentally, users must report this immediately to the Clerk. It can then be taken into account as part of the Council's monitoring procedure.
- 12.12 Councillors must avoid posting views in advance of a decision to be debated by the Council or a committee meeting, that may constitute predetermination or bias. The Localism Act 2011 states that councillors must not have "had or appeared to have had a closed mind (to any extent) when making the decision"., (*See Localism Act section 25*).

13 Monitoring

- 13.1 Misuse of such sites in a manner that is contrary to this and other policies could result in action being taken.
- 13.2 Serious breaches of this policy by a Council employee will amount to gross misconduct and may result in dismissal.
- 13.3 Breaches of this policy by councillors may result in a Code of Conduct complaint being submitted against them.
- 13.4 Serious breaches of this policy by councillors, members of the public or members of any other organisation or company may result in legal or police action.