

BINGLEY TOWN COUNCIL



Bingley Town Council, Myrtle Place, Bingley, BD16 2LF

Communications Policy

Date of review: 28th May 2024

Next review: May 2025

This policy aims to guide Council activity in respect of the media, the use of social media, the use of email and the internet, and events including speaking engagements.

Contents

Why we need a policy?	2
Background documents	2
Who does this policy apply to?	3
Responsibility for implementation of the policy	3
Monitoring and reviewing.....	3
Media Policy.....	4
Introduction	4
Legal requirements and restrictions	4
Media and public involvement in meetings.....	4
Communications with the media and other organisations and councillor responsibilities	5
Social Media Policy	7
Introduction	7
Using Bingley Town Council’s social media sites	7
Using social media	7
Rules for use of social media	8
Monitoring use of social media websites	9
Policy for use of Facebook	10
Email and Internet Policy.....	12
Introduction	12
General.....	12
Email etiquette.....	12
Unacceptable use of the internet	13
Personal use of email and the internet.....	13
Monitoring and privacy.....	14
Editorial Policy for Communications.....	16
Appendix A.....	17

Social media guidelines.....	17
General advice	17
Facebook specific advice.....	17
Twitter specific advice	18
Instagram	18
Actions for councillors	18

Why we need a policy?

Its purpose is:

- To enable the Council collectively to be a reliable, timely, regular and dependable provider of information
- To enable all Council communications to reflect accurately the position of the Council
- To consult, interact, distribute information and be clear and transparent about the Council’s activities and decisions
- To enable residents, electors, other stakeholders and organisations to contact the Council
- To enable the Council to contact residents, electors, other stakeholders and organisations
- To enable residents, electors and organisations to share community information with each other
- To support, guide and assist councillors with their communications, both internal to other councillors and staff and external to members of the public and other organisations
- To meet legislative requirements.

The media policy also assists councillors in abiding by the 7 Nolan Principles (and helps demonstrate they are achieving them):

- Selflessness – act in the public interest
- Integrity – under no obligation to or influence of other people
- Objectivity – act fairly & impartially
- Accountability – submit to public scrutiny
- Openness – open & transparent
- Honesty
- Leadership

Background documents

This policy has drawn from the following, as well as the recommendations of the Events, Media and Communications Sub-Committee:

- The Information Commissioner’s Office guidance under the Model Publications Scheme

- The NALC Parish Council media plan
- The Society of Local Council Clerks Society social media policy
- Applicable parts of the SLCC's advice note on email and internet use.

Who does this policy apply to?

All employees, members and volunteers are expected to comply with this policy at all times to protect the privacy, confidentiality and interests of the Council.

Breach of this policy by employees may be dealt with under the Council's Disciplinary Procedure and, in serious cases, may be treated as treated as gross misconduct leading to summary dismissal.

Responsibility for implementation of the policy

The Council has overall responsibility for the effective operation of this policy.

The Clerk is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to our work.

All employees, members and volunteers should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the Clerk.

Employees will be required to sign that they have received and read this policy document.

Monitoring and reviewing

The Events, Marketing and Communications Committee/Full Council will be responsible for reviewing this policy annually to ensure that it meets legal requirements and reflects best practice.

Media Policy

Introduction

1. Bingley Town Council is committed to the provision of accurate information about its governance, decisions and activities. If information is not available via the Council's media or other policies, the Council's Clerk should be contacted.
2. The Council will, where possible, co-operate with those whose work involves gathering material for publication in any form including use of the internet ("the media").
3. This policy explains how the Council may work with members of the media to meet the above objectives in accordance with the legal requirements and restrictions that apply.
4. The policy covers SEPO (shared, earned, paid and owned) media and communications.

Legal requirements and restrictions

1. This policy is subject to the Council's obligations which are set out in the Public Bodies (Admission to Meetings) Act 1960, the Local Government Act 1972, the Local Government Act 1986, the Freedom of Information Act 2000, the Data Protection Act 1998, other legislation which may apply and the Council's Standing Orders and Financial Regulations. The Council's Financial Regulations and relevant Standing Orders referenced in this policy are available via the Council's publication scheme.
2. The Council cannot disclose confidential information or information the disclosure of which is prohibited by law. The Council cannot disclose information if this is prohibited under the terms of a court order, by legislation, the Council's Standing Orders, under contract or by common law. Councillors are subject to additional restrictions about the disclosure of confidential information which arise from the Code of Conduct adopted by the Council, a copy of which is available via the Council's publication scheme. The particularly relevant section is: He/she shall not disclose information which is confidential or where disclosure is prohibited by law.

Media and public involvement in meetings

1. A meeting of the Council and its committees is open to the public unless the meeting resolves to exclude them because their presence at the meeting is prejudicial to the public interest due to the confidential nature of the business or other special reason(s) stated in the resolution. In accordance with the Council's Standing Orders, a person may be required to leave a meeting of the Council and its committees if their disorderly behaviour obstructs the business of the meeting.
2. Where a meeting of the Council and its committees include an opportunity for public participation, the media may speak and ask questions. Public participation is regulated by the Council's Standing Orders. The photographing, recording, filming or other

reporting of a meeting of the Council and its committees (which includes e.g. using a mobile phone or tablet, recording for a TV/radio broadcast, providing commentary on blogs, web forums, or social networking sites such as Twitter, Facebook and YouTube) which enable a person not at the meeting to see, hear or be given commentary about the meeting is permitted unless (i) the meeting has resolved to hold all or part of the meeting without the public present or (ii) such activities disrupt the proceedings or (iii) clause 3 below applies.

3. The photographing, recording, filming or other reporting of a child or vulnerable adult at a Council or committee meeting is not permitted unless an adult responsible for them has given permission.
4. The Council shall, as far as it is practicable, provide reasonable facilities for anyone taking a report of a Council or committee meeting.
5. The Council's Standing Orders will confirm if attendance by the public, their participation, photographing, recording, filming or other reporting is permitted at a meeting of a sub-committee.
6. The Council has adopted a policy 'Guidance for the Recording of Meetings' which is available on the Town Council website or from the Clerk.

Communications with the media and other organisations and councillor responsibilities

1. This policy does not seek to regulate councillors in their private capacity.
2. The Council's communications with the media should always represent the corporate position and views of the Council. If the views of councillors are different to the Council's corporate position and views, they must make this clear.
3. The Council's Clerk, or in their absence, the Chair of the Council (or in their absence the Vice-Chair of the Council) may contact the media if the Council wants to provide information, a statement or other material about the Council.
4. The Clerk, the Chair of the Council, or in their absence the Vice-Chair of the Council, or, if relevant, the Chair of a Committee, will be spokespeople for the Council.
5. Councillors authoring contributions to newsletters of other organisations on behalf of the Council should check any draft with the Clerk before submitting for publication.
6. Councillors invited to speak about the work of the Council to any organisation or group should consult the Clerk about the engagement, before confirming attendance. Any speech or presentations given should be first checked and agreed with the Clerk to ensure the Council's position is accurately reflected.

7. Subject to the obligations on councillors not to disclose information referred to in the section regarding Legal requirements and restrictions above and not to misrepresent the Council's position, councillors are free to communicate their position and views.

Social Media Policy

Introduction

1. This policy is intended to help employees including clerks, RFOs, part-time, fixed-term and casual employees (collectively referred to as employees in this policy), members and volunteers make appropriate decisions about the use of social media such as posts, blogs, social networking websites, forums, message boards, or comments on web-articles, such as on X (formerly Twitter), Facebook, LinkedIn and YouTube.
2. This policy outlines the standards required by employees, members and volunteers when using social media in relation to the Council's activities, the circumstances in which the Council monitors an individual's use of social media and the action it will take in respect of breaches of this policy.
3. This policy supplements the Council's Email and Internet Policy (see below) and, at present, relates to content on the Council's Facebook page and X (Twitter) account.

Using Bingley Town Council's social media sites

1. Only the Clerk and named councillors, agreed by the Events, Marketing and Communications Committee, are permitted to post material on a website or social media platform in the Council's name and on its behalf.
2. Councillors must not comment as individuals under the Council's name (for example, posting to the Council's Facebook page and giving their own name as author of the post.)
3. A councillor who wishes to post to the Council's Facebook page or X (Twitter) account under their own name as a guest is free to do so but another councillor, authorised to use the page, must then take the decision to share the post, if relevant and meeting the specified criteria, to the page – or not.
4. Any enquiries received through social media sites can be acknowledged by the named councillors and referred to the Clerk.

Using social media

1. The Council recognises the importance of social media in shaping public thinking about our council and community. It also recognises the importance of employees, member and volunteers joining in and helping shape local government conversation and direction through interaction in social media.

2. Before using social media on any matter which might affect the interests of the Council employees, employees, members and volunteers must:
 - have read and understood this policy and the Council's other media and communications policies, and,
 - have sought and gained prior written approval to do so from the Events, Marketing and Communications Committee.

Rules for use of social media

1. Whenever you are permitted to use social media in accordance with this policy, you must adhere to the following general rules:
 - Do not upload, post, tweet/retweet or forward a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content
 - Any employee, volunteer or member who feels that they have been harassed or bullied, or are offended by material posted or uploaded by a colleague acting on behalf of the council onto a social media website should inform the Clerk or the Chair of the Council or, in their absence, the Vice-Chair
 - Commercially sensitive, personal private or confidential information should never be disclosed. If there is uncertainty about whether the information intended to be shared falls within one of these categories, this should be discussed with the Clerk.
 - Agreed Town Council: only issues that have been discussed and agreed by a committee of the Council or that give information about the Council's meetings, events, agendas, minutes and policy documents can be posted to the Council's social media sites. In addition, items published by central and local government bodies or public health organisations, which give information or advice essential to residents, can be shared. This includes surveys and questionnaires which are deemed to be of value to residents and to Bingley Town Council in its policy making and planning. Such items will be agreed by the Chair of the Council and the Clerk or Deputy Clerk in their absence.
 - Third party content: advertisements for commercial interests will not generally be shared, posted or hosted on the Council's sites. Details of community events run by primarily not-for-profit organisations are acceptable; however, the posting of details of any fund-raising appeals or events must be agreed by the Finance and General Purposes Committee
 - Any content belonging to a third party should not be uploaded, posted or forwarded unless the third party gives consent or the information is already in the public domain
 - Before linking to a third-party website, any terms and conditions of that website should be checked to ensure linking is permitted
 - Be honest and open, but be mindful of the impact any contribution might make to people's perceptions of the Council

- Do not escalate heated discussions. Refer complaints and inquiries to the Clerk giving contact details
- Always consider others' privacy and avoid discussing topics that may be inflammatory
- Councillors need to be aware that if they publish contact details they can be accessed and used widely by people
- Councillors and staff must never publish anyone else's contact details without their permission

Monitoring use of social media websites

1. Employees should be aware that any use of social media websites (whether or not accessed for Council purposes) may be monitored and, where breaches of this policy are found, action may be taken against employees under the Council's Disciplinary Procedure.
2. Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against individual councillors or the Council.
3. In particular, a serious case of uploading, posting forwarding or posting a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will probably amount to gross misconduct (this list is not exhaustive):
 - pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature)
 - a false and defamatory statement about any person or organisation
 - material which is offensive, obscene, criminal, discriminatory, derogatory or may cause embarrassment to the council, members, or our employees
 - confidential information about the Council or anyone else
 - any other statement which is likely to create any liability (whether criminal or civil, and whether for you or the Council); or,
 - material in breach of copyright or other intellectual property rights, or which invades the privacy of any person
4. Any such action will be addressed under the Disciplinary Procedure and for employees may result in summary dismissal.
5. Where evidence of misuse is found the Council may undertake a more detailed investigation in accordance with the Disciplinary Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the investigation. If

necessary, such information may be handed to the police in connection with a criminal investigation.

6. Anyone who notices any use of social media by other employees or volunteers in breach of this policy is asked to report it to the Clerk.

Policy for use of Facebook

The following text has previously been reproduced on the Bingley Town Council Facebook page – and may serve as guidance for other social media sites.

The Bingley Town Council Facebook pages intends to:

Provide information and updates regarding activities and opportunities within Bingley Parish and promote positive comments from residents within the parish.

In order to ensure that all discussions on the Bingley Town Council page are productive, respectful and consistent with the Council's goals, we ask you to follow these guidelines:

- Be considerate and respectful of others. Vulgarity, threats or abuse of language will not be tolerated.
- Differing opinions and discussion of diverse ideas are encouraged, but personal attacks on anyone, including Bingley Town Councillors or staff, are not.
- Share freely and be generous, but be aware of copyright laws; be accurate and give credit where credit is due.
- Stay on topic.
- Refrain from using the Facebook page for commercial purposes or to market products.

The site is 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.

Sending a message/post via Facebook 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 the Facebook channel. Instead, please contact the Council through the Clerk on enquiries@bingleytowncouncil.gov.uk

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

- Obscene or racist content
- Personal attacks, insults, or threatening language
- Potentially libelous statements
- Plagiarized 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

Non-compliance will not be tolerated and may result in a ban.

Bingley Town Council is not responsible for the accuracy of content posted by any subscriber in any forum; opinions expressed in comments on Bingley Town Council social media forums do not necessarily represent those of Bingley Town Council.

All comments, once posted, become the property of Bingley Town Council and we reserve the right to reproduce, distribute, publish, display or edit. Derivative work can also be created from such postings or content, and used for any purpose, in any form and on any other media.

Bingley Town Council is not responsible, liable for and does not endorse the privacy practices of Facebook or any linked websites. Your use of Facebook and any linked websites is at your own risk.

Bingley Town Council assumes no responsibility or liability for any injury, loss or damage incurred as a result of any use or reliance upon the information and material contained within or downloaded from these websites.

Facebook may occasionally be unavailable and we accept no responsibility for this lack of service.

The presence of any advertisement on Facebook is not an endorsement of the authenticity or quality of the goods, services or website and Bingley Town Council will not be held responsible for any claims arising in that respect.

We will not engage in/with, and we discourage posts or comments on, issues of a party political nature.

This comment policy may be revised at any time.

By choosing to comment and/or utilise any Bingley Town Council social media site, users are deemed to agree to this policy.

Email and Internet Policy

Introduction

1. Employees, members and volunteers need to be aware that communications via email, and internet usage undertaken in the name of the Council or on Council systems carry inherent risks including potential defamation, the spreading of viruses, cyber-attack, breach of contract, breach of copyright, breach of data protection legislation, breach of privacy and unlawful discrimination.
2. At the same time, the Council's right to monitor email and internet usage must be exercised in accordance with the law, in particular GDPR, the Data Protection Act 1998 and the Human Rights Act, as monitoring is usually intrusive and employees have a right to some privacy within the workplace.

General

1. The Council provides employees, members and volunteers with email and internet access as required for the performance and fulfilment of job responsibilities and therefore usage should be restricted to these activities.
2. The Good Councillors Guide says that councillors have a duty to be well informed and therefore Councillors are expected to check their email accounts regularly and ensure that they read any supporting documents issued via this medium as information for a meeting in which they will play a part in decision making.
3. Employees are expected to use email and the internet sensibly and in such a manner that it does not interfere with the efficient running of the organisation. Employees may be asked to justify the amount of time they have spent on the internet or the sites that they have visited. The Council trusts employees not to abuse the latitude given to them, but if this trust is abused it reserves the right to impose a time-limitation on work-related internet use.
4. The Council reserves the right to deny internet access to any employee at work, although in such a case it will endeavour to give reasons for doing so.
5. Employees should download files only onto computers with virus-checking software and should check how long the download will take. If there is any uncertainty as to whether or not the software is virus-free or whether or not the time the download will take is reasonable, the relevant line manager and the Council's IT support should be consulted.

Email etiquette

1. The following points should act as a guide to appropriate email usage:

- It is good practice to use an agreed email signature, including a waiver clause
- Emails must be written using appropriate business language
- Emails must not contain or circulate any offensive, libellous, indecent or obscene material or anything that breaches the Council's Equality Policy
- Emails must adhere to rules regarding confidentiality, e.g. when sending to multiple addressees private emails should be bcc'ed to avoid giving out personal data
- Users must be aware of the possibilities of importing viruses into the system and should not open suspect attachments or click on links unless absolutely certain that they are safe
- Emails should not contain attachments larger than 5 MB
- The recipient's email address should be double-checked to ensure it is correct
- All users should check whether it is appropriate to "reply all" or copy "to all"

Unacceptable use of the internet

The following is deemed to be unacceptable use of or behaviour on the internet:

- Allowing non-authorized users to access the internet using an employee's log-in or while logged on
- visiting internet sites that contain obscene, hateful, pornographic or otherwise illegal material
- passing on such material to colleagues or external people
- using the computer to perpetrate any form of fraud, or software, film or music piracy
- using the internet to send offensive or harassing material to other users
- downloading commercial software or any copyrighted materials belonging to third parties, unless this download is covered or permitted under a commercial agreement or other such licence
- hacking into unauthorised areas
- publishing defamatory and/or knowingly false material about the Council, its employees, members or members of the public on social networking sites, blogs, Wikis or any other online publishing format
- undertaking deliberate activities that waste staff effort or networked resources
- introducing any form of malicious software into the Council's network
- gambling online
- disclosure of any confidential information without express consent
- any other area that the Council reasonably believes may cause them problems

Personal use of email and the internet

1. The Council understands that on occasion employees, members and volunteers may need to send or receive personal emails using their Council address. Similarly, employees may need to use the internet for personal purposes.
2. When sending personal emails, employees, members and volunteers should show the same care as when sending Council-related emails. Employees may access the internet at work for personal purposes provided that:

- such use is limited to no more than 30 minutes in any day
 - the internet is not used to access offensive or illegal material
 - they do not enter into any contracts or commitments in the name of or on behalf of the Council
3. Employees are prohibited from using their own personal devices or software on Council owned systems.
 4. All electronic and communication systems, including PC's, laptops, mobile telephones and PDA's (personal digital assistants) and all communications and stored information sent, received, created on, or contained within Council equipment is the property of the Council.
 5. The use of memory sticks is prohibited due to the potential risk of these being lost (even encrypted memory sticks can be decoded so are never risk-free).

Monitoring and privacy

1. The Council reserves the right to monitor employees' emails or internet usage, but will endeavour to inform an affected employee when this is to happen and the reasons for it.
2. The Council considers the following to be valid reasons for checking an employee's email:
 - If the employee is absent for any reason and communications must be checked for the smooth running of the organisation to continue
 - If the Council suspects that the employee has been viewing or sending offensive or illegal material, such as material containing racist terminology or nudity (although the organisation understands that it is possible for employees inadvertently to receive such material and they will have the opportunity to explain if this is the case)
 - If the Council suspects that an employee has been using the email system to send and receive an excessive number of personal communications
 - If the Council suspects that the employee is sending or receiving emails that are detrimental to the Council
 - When monitoring emails, the Council will, save in exceptional circumstances, confine itself to looking at the address and heading of the emails. Employees should mark any personal emails as such and encourage those who send them to do the same. Where possible, the Council will avoid opening emails clearly marked as private or personal
 - The Council reserves the right to retain information that it has gathered on employees' use of email for a period of one year
3. The Council considers the following to be valid reasons for checking an employee's internet usage:

- If the Council suspects that the employee has been viewing offensive or illegal material, (although the organisation understands that it is possible for employees inadvertently to view such material and they will have the opportunity to explain if this is the case)
 - If the Council suspects that the employee has been spending an excessive amount of time viewing websites that are not work related
 - The Council reserves the right to retain information that it has gathered on employees' use of the internet for a period of one year
4. Emails and internet use may also be monitored for the purposes of the prevention or detection of crime, apprehension or prosecution of offenders and collection or assessment of any tax or duty.
 5. The Council is subject to Article 8 of the Human Rights Act, which creates a right to respect for private and family life. Care will be taken to ensure that any monitoring is not excessive. The extent of any monitoring will be made clear and a privacy impact assessment may be undertaken.
 6. Employees are advised that if monitoring identifies potential breaches of this policy, this may lead to formal disciplinary action. Serious breaches may amount to summary dismissal for gross misconduct.

Editorial Policy for Communications

The primary function of Bingley Town Council's communications is to tell the community about the Town Council's activities.

Where possible, all communications will refer to the Town Council rather than individual councillors, unless particularly warranted.

Communications, including social media and the newsletter, will not feature local groups unless there is a reason to do so.

All communications will be authored by the Town Council.

Appendix A

Social media guidelines

General advice

- Recognise that posts are more likely to be seen at these times:
 - weekdays: 7-9am & 5-7pm
 - Saturday: same as weekdays excluding older and younger people
 - Sunday: 1-3pm
- News stories should be shared as soon as possible to get the most response.
- When writing posts: start the sentence with the most important information first. Use simple syntax (I.E., avoid using contractions and commas) and keep it short.
- Use hashtags relevant to the area/subject. Try and use hashtags other people are using instead of inventing your own (e.g., #Bingley will reach more people than #BingleyTownCouncil).
- Emojis (when used in the right context) can help to draw attention to the text
 - Frome Town Council sets a good example as to how to do this.
- Always use images as part of posts (where appropriate) - squares work best on Facebook/Instagram. Landscape works best for X (Twitter).

Facebook specific advice

- Aim to fit text within 2-3 lines.
- If you're writing a larger amount of text: try and start the first sentence with something snappy to grab people's attention.
- Try and post a link without having the web address in the post (can depend on what device you use).
- Use no more than 4-5 emojis.
- Use no more than two hashtags.
- Schedule Facebook posts to ensure they're within the times stated above (unless it's something to be posted immediately):
<https://www.facebook.com/help/389849807718635>
- Facebook groups are a good way of reaching out to people - some parish councils have set up their own Facebook groups which could be considered.
- The public facing Facebook page is the furthest reaching tool when it comes to advertising events etc.
- Facebook is the most widely used with 51% of adults using it more than once a day.

X (Twitter) specific advice

- Keep text simple and direct.
- Use hashtags where applicable. Hashtags are a lot more relevant on X (X recommends using around 3).
- Use as many emojis as you please. X is more personality driven.
- Only ¼ of adults use X regularly, the rest use it less than once a week.

Instagram

- Keep text simple and direct (there's no limit here but you can't use paragraphs).
- Use hashtags where applicable. Hashtags are also relevant to Instagram.
- Use as many emojis as you please. Instagram is also more personality driven.
- Use engaging photos. Photos with people enjoying themselves are the most effective.
- If Infographics are used, make sure they're used at a ratio no higher than 1:1 (too many infographics can make the account look as if it's controlled by a 'robot').
- The number of users is ⅓ of Facebook. But 63% use Instagram regularly.

Actions for councillors

- Set up either a WhatsApp, Facebook or other suitable chat between the admins so that they can keep each other in the loop.
- To consider ways of publicising what we agree for press release to be also posted on social media.
- To consider the use of Infographics.
- To consider what social media account we should use and for what.
- To advise councillors to watch other social media accounts similar to our own in order to keep up to date with current trends.