



**STREET PARISH COUNCIL**

**Communications Policy**

**Adopted: 5 December 2023**

**Reviewed: 23 July 2024 Policy & Finance Committee**

**Next Review: Annual Council Meeting May 2025**

| <b>Other Documents Referenced</b>                              |
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| Public Order Act 1986.   |
| Malicious Communications Act 1988                              |
| Terrorism Act 2006   |
| Local Government Act 1972, Schedule 12A                        |
| Common Law Duty of Confidentiality                             |
| Equality Act 2010  |
| Data Protection Act 2018 (DPA)                                 |
| Communications Act 2003  |
| Street Parish Council Document Control Policy                  |
| Street Parish Council Streaming & Recording of Meetings Policy |
| Street Parish Council Standing Orders & Code of Conduct        |

| <b>Document Approved</b>   | <b>Date</b>      |
|----------------------------|------------------|
| Policy & Finance Committee | 28 November 2023 |
| Full Council               | 5 December 2023  |

## **Accessibility Information.**

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## **Glossary.**

Throughout this document the following terms apply:

- Communication refers to the transmission of information by any means including verbal, written, pictorial or in digital form, regardless of the platform used.
- Council refers to Street Parish Council (SPC) unless otherwise stated.
- Officers refers to staff in the employ of Street Parish Council, e.g., the Clerk.
- Councillors refers to any elected or co-opted members of the Council.
- The Public refers to anyone who is not a Councillor or Officer.
- The Press refers to a member of the Public employed by a media organisation.
- Contractor refers to any organisation providing a service to SPC regardless of whether this is a one-off provision or a longer-term contract.
- Stakeholder refers to an individual, group or organisation that may be impacted by Council communications.

## **1. Introduction.**

1.1 This Communication Policy is a public document for Council officers, Councillors, the public, press and contractors. This policy supports the transparency, accessibility, and accountability of Council communications.

## **2. Purpose.**

The purpose of this policy is:

2.1 To provide a commitment to clear, open, and respectful communication between Councillors and between the Council, its Officers, the public, press, contractors, and stakeholders.

2.2 To ensure the targeting of Council communications is consistent and relevant.

2.3 To ensure compliance with all relevant legislative and regulatory requirements and our Standing Orders.

## **3. Scope.**

3.1 This policy applies to all communications generated by the Council and supports the Code of Conduct in SPC Standing Orders.

Examples include, but are not limited to:

- Internal Council emails or printed or verbal communications.
- External Council communications to members of the public, press, stakeholders, or contractors.
- Information published on the Council website.
- Information published on the Council social media pages.

3.2 This policy covers all forms of recording and reporting and all forms of media and supports the Council's Streaming & Recording of Meetings Policy.

#### **4. Policy Statement.**

4.1 Council is committed to being open, transparent, and respectful of others in all our communications, ensuring such communication complies with all legal and regulatory requirements and our Standing Orders.

4.2 Council will, on request, make available summaries of this policy, targeted at relevant audiences using appropriate media.

4.3 Council will seek to balance our obligations for accountability and transparency of communication with our data protection and confidentiality duties. Where information is exempt from disclosure for data protection reasons or subject to a duty of confidentiality, we will seek to edit that information. In the event of a breach involving personal information, we will follow our Data Protection Policy.

#### **5. Legal and Regulatory Requirements.**

5.1 Council will seek to comply with all relevant legal and regulatory requirements and guidance in relation to its communications.

5.2 The legal and regulatory requirements that apply to the Council include, but are not limited to:

- Common Law Duty of Confidentiality
- Equality Act 2010
- Data Protection Act 2018 (DPA)
- Malicious Communications Act 1988
- Communications Act 2003
- Public Order Act 1986.
- Terrorism Act 2006.

#### **6. Accountability.**

6.1. The Council will not tolerate communications that seek to belittle or abuse others, are obscene, seek to misrepresent statements or facts, disclose private or personal information without permission or are made for the express purpose of causing anxiety or distress.

6.2 Council will ensure its communications are relevant to a targeted audience and transmitted in such a way as to allow all members of the target audience to receive and understand the communication.

6.3 The Council will deal with any complaints regarding its communications through the appropriate local and County procedures.

6.4 Should investigation of a complaint reveal an actionable offence under UK law then the Council will pass this on to the relevant authority.

6.5 Council communication should not contain any party political content.

## **7. Communication Planning.**

7.1 This section applies to the targeting of communications to relevant audiences.

7.2 When seeking to communicate to a specific target audience the Council will:

- Establish goals – what is the purpose of the communication and how does the Council wish it to be perceived by stakeholders and audience?
- Identify stakeholders and target audience – who are we trying to influence and what is the most effective way to reach them?
- Develop a key message – what message will resonate most strongly?
- Address the dissemination method – what are the best methods/platforms to communicate the message?
- Develop materials - what form(s) should the message take?
- Decide on a timeline – when should dissemination begin, when should it end, and should it be staggered across different platforms?
- Two-way feedback – track the effectiveness of the message by enabling feedback from the stakeholders and audience and ensuring Council feeds back results in return.
- Review results – use data recovered to plan further communication around the message or end the process.

7.3 The process outlined in 7.2 may be triggered by decisions made in Council meetings or proposals brought forward by individual Councillors, stakeholders, or members of the public.

## **8 Dealing with the Press.**

8.1 Good relations with the Press are very important to ensure Council communications reach as wide an audience as possible both with positive messages and when responding to negative profiling.

8.2 It should be noted that the Press are more likely to contact the Unitary Council regarding matters of national or regional policy rather than the Parish Council. However, it should not be assumed that this will always be the case and SPC should have an agreed position on any regional or national pronouncements to enable a consistent response to the press from Officers and Councillors.

8.3 Council must appoint a named individual and alternate to be first port of call for Press enquiries and have them receive training to enable them to deal effectively with such enquiries. The individuals must be of sufficient seniority to ensure the Press will take their input seriously. As an example, the Clerk/Deputy Clerk and the Chair or a Councillor appointed as Communication Lead.

8.4 Any Press communications must ensure that:

- The content is the agreed position of the Council.
- Confidential items pursuant to any Data Protection legislation are redacted.
- No obscenities or actionable remarks are included.
- No images or audio of children or vulnerable adults (safeguarding) are included unless the relevant permissions have been obtained.
- Nothing unrelated to the purpose of the communication is included.

- The content is deemed, “newsworthy” and likely to be of interest to the Press.

8.5 Records of Press communications will be retained in line with Council Document Control Policy.

8.6 Requests for a spokesperson to appear on the record in a podcast, radio or television production must be made through the Clerk who will convene a meeting of interested Councillors to agree the Council’s message, responses and who the spokesperson will be.

## **9 Roles and Responsibilities**

9.1 The Clerk of the Council has responsibility for administration and compliance of this policy. Their contact details can be found in the Accessibility paragraph on page 2 above.

9.2 The Chair, in conjunction with the Clerk, will direct any investigation into a complaint made under this policy unless they are themselves the object of the complaint, in which case the Vice Chair and, or Deputy Clerk will direct the investigation.

9.3 Councillors and Officers will refrain from commenting to the Press unless putting the agreed position of the Council.

9.4 Any contact by the Press to an individual Councillor or Officer must be transferred to the persons appointed in 8.3 above if there is no agreed Council position.

9.5 The Officer responsible for the Council website and Social Media pages must screen all items to be posted to ensure such items comply with this policy.

9.6 Councillors and Officers will refrain from conducting debates on Council business via email or any other communication method. As a guide, requests for information or clarification will result in replies giving such information or clarification or appropriate signposting. Anything that results in multiple replies with differing views or opinions should be viewed as debate and the subject put forward to the Clerk for inclusion in the next Council agenda.

## **10 Social Media and Website Content**

10.1 Items to be posted on the Council website or social media pages must go through the Officer responsible for such content.

10.2 Council does not monitor the personal websites or social media accounts of Officers or Councillors. However, it is expected that Officers and Councillors will, as elected representatives of the community, ensure that any content they post complies with the principles set out in the Code of Conduct contained in the Standing Orders and paragraph 6.1 above.

10.3 The restriction in 10.2 applies for the entire period of an Officer’s employ or a Councillor’s term of office and is not limited by their hours of engagement.

10.4 Content must not be edited in such a way that could lead to misinterpretation of or infringe the core values of the Council. This includes editing an image or views expressed in a way that may ridicule or show a lack of respect towards a person, stakeholder, or contractor.

10.5 Audio, video or still images must not breach any Data Protection legislation.

10.6 Any content posted to personal accounts must not include any items that would be subject to an exclusion of Press and Public in a Council meeting under Local Government Act 1972, Schedule 12A.

10.7 Councillors and Officers will not post content relating to sensitive community items, such as planning applications, on their personal accounts until decisions relating to them have been made and implemented.

10.8 Councillors, Officers stakeholders and contractors should report any severely critical content they encounter on their personal pages related to the Council to the Clerk to formulate a response. They must not respond in a knee-jerk fashion thereby possibly exacerbating the situation.

## **11 Compliance**

11.1 Council Officers, Councillors, the public, and press must comply with this Policy.

## **12 Review**

12.1 This policy will be reviewed every 2 years from its initial approval date by full Council, to ensure it remains fit for purpose and in line with any changes to legal and regulatory requirements, relevant guidance, and best practice, subject to clause 12.2.

12.2 Should any significant change in relevant legislation occur before the allotted review date then the Policy will be reviewed at once and the ongoing review date altered to reflect the new date of approval.