



Horley Town Council

Communications and Social Media Policy

Part 1 – Communications Generally

1. Introduction

The aim of this Communications and Social Media Policy is to set out a Code of Practice to provide guidance to Councillors and Officers about the use of communications, such as, general correspondence, emails, social networking sites, podcasts, forums, messages boards or comments on web articles such as Twitter, Facebook and other relevant social media sites.

Horley Town Council is committed to active community engagement through a wide range of channels, including online and social media.

The Town Council is committed to the provision of accurate information in respect of its functions, decisions and actions. Accordingly, care needs to be taken when addressing communications within the Town Council and to external organisations and other local government authorities, outside bodies or community groups.

2. Town Council correspondence

The point of contact for Horley Town Council is the Town Clerk and it is to the post holder that all correspondence to the Town Council should be addressed. The Town Clerk (or delegated Officer) should deal with the correspondence and will ensure that information or direct enquiry is passed to Councillors as appropriate. No individual Councillor or Officer shall be the sole custodian of any correspondence or information in the name of the Town Council, a Committee, Sub-Committee or Working Group. In particular, Councillors and Officers do not have the right to obtain confidential information/documentation unless they can demonstrate a “need to know”.

All official correspondence should be sent by the Town Clerk in the name of the Town Council using letter headed paper. Where correspondence to a Councillor is copied to another person, the addressee should be made aware that a copy is being forwarded to that other person.

3. Agenda items for Council, Committees, Sub-Committees and Working Groups

Agendas should be clear and concise. They should contain sufficient information to enable Councillors to make an informed decision and for Councillors and the public to understand what matters are being considered and what decisions are to be taken at a meeting. Items for information should be kept to a minimum on an agenda. Where the Town Clerk or a Councillor wishes fellow Councillors to receive matters for “information only”, this information should be circulated via the Town Clerk or delegated Officer.

4. Communications with the Press and Public

The Town Clerk will discuss press reports, or comments to the media with the Chairman and Council Leaders, as appropriate. If the Chairman is absent, the report or comments will be discussed with the Vice- Chairman. Press reports from the Council, its Committees or Working Groups should be from the Town Clerk or an Officer or via the reporter's own attendance at a meeting. Unless a Councillor has been authorised by the Council to speak to the media on a particular issue, Councillors who are asked for comment by the press should make it clear that it is a personal view and ask that it be recorded as their personal view.

When responding to social media comments/statements, the same should apply by advising that this is a personal view and not necessarily the view of the Council. In their reply, a Councillor should report that they are responding on a non-Councillor basis. Unless a Councillor is absolutely certain that he/she is reporting the view of the Council, even if they did not agree with the decision when it was made, the Councillor must make it clear to members of the public they are expressing a personal view. If Councillors receive a complaint from a member of the public, this should be dealt with by the Town Clerk in accordance with the Town Council's Complaints Policy.

5. Councillor correspondence to external parties

As the Town Clerk will be sending most of the Council's correspondence from the Council to other bodies, partners or organisations, it needs to be made clear that it is written in their official capacity and has been authorised by the Town Council unless it is an operational or other matter requiring the Town Clerk to respond by delegated authority as the Proper Officer.

Where after discussion with the Town Clerk, Councillors wish to pursue an initiative on an unofficial/individual basis, they should be mindful of the following:

- a. The need to take care not to give the impression that the initiative has the support of or represents official Town Council Policy;
- b. The dangers of the public or other partners or external bodies in their expectations;
- c. Publicity or media coverage which may reflect on the Town Council.

Accordingly, Councillors should make it clear that they are acting in an unofficial or personal capacity. As a general rule, individual Councillors should not approach another body, statutory, voluntary or commercial organisation, other than in a personal capacity, seeking information which might be related to any Town Council function. Such approaches should be made formally by the Town Clerk or delegated Officer, on behalf of the Councillor in an official capacity. In this respect, Councillors are advised to contact the Town Clerk as above. If a Councillor is dissatisfied with the actions/advice given, then they may ask for an item to be included on the agenda for a Council meeting or appropriate Committee. A copy of all outgoing correspondence relating to the Council or a Councillor's role within it, should be sent to the Town Clerk, and for it to be noted on the correspondence "copy to the Town Clerk" so that the recipient is aware that the Town Clerk has been advised.

6. Communications between Councillors and Staff

Whilst all Councillors and Staff are encouraged to develop contact with each other, both Councillors and Staff need to be conscious of the "Employer" and "Employee" relationship and professional standards should be maintained at all times. Both should be aware that requests directly from Councillors to employees to action given matters, whether established Council Policy or not, can disrupt established routines and work programmes and could confuse line management.

Councillors wishing to have urgent action taken, should contact the Town Clerk who can then reschedule staff priorities if necessary. Councillors must not give instructions to any member of staff, unless specifically authorised to do so (for example, 3 or more Councillors sitting as a Committee or Working Group with appropriate delegated authority from the Town Council). In such circumstances, Councillors who wish to investigate or promote any issue for possible adoption and/or action should, in any event, discuss the matter with the Town Clerk so that preliminary consideration can be given to the legal, financial, technical, and staffing implications and to the possible impact and relationship to existing projects or policies in which the Town Council is currently involved.

7. Email and Phone Communication

Instant replies to emails and phone requests should not be expected and reasons for urgency should be clearly stated. Information to Councillors should normally be directed via the Town Clerk or delegated Officer. Emails from Councillors to external parties regarding Council business should be copied to the Town Clerk. Councillors should acknowledge their emails when requested to do so.

8. Meetings with the Town Clerk or other Officers

Wherever possible, an appointment should be agreed and made in advance. Meetings should be relevant to the work of that particular Officer. Councillors should be clear that the matter is legitimate Town Council business and not matters driven by personal or political agendas.

Part 2 – Social Media

1. Introduction to Social Media

As Horley Town Council takes on additional responsibilities, it will seek to grow its social media presence to maintain positive interaction with residents on local government matters and to support the local community. This Communications and Social Media Policy provides a framework for the appropriate and safe use of corporate (i.e. Town Council operated) social media channels by Councillors and Officers.

2. Scope

This Communications and Social Media Policy sits alongside the Press Protocol used by the Town Council as well as the Council's Standing Orders in informing Councillors and Officers of acceptable practice when operating Council social media accounts. It applies to all employees and elected Councillors of Horley Town Council.

3. Policy Statement

This Communications and Social Media Policy provides a framework for the appropriate use of social media and will ensure that its use is effective, lawful, and does not bring the Council into ill-repute. It will also ensure that Council computer networks and stored information remain uncompromised.

4. Aims of Social Media

This Communications and Social Media Policy will clearly set out how social media can be managed effectively and how any risks can be avoided or mitigated. Social media offers great potential for building relationships and improving Council interaction with local residents. The Town Council aims to use social media channels to:

- Improve engagement with individuals, communities, and to successfully promote Council services;
- Apply a consistent and corporate voice across Town Council social media platforms;
- Operate within existing policies, guidelines, and relevant legislation;
- Ensure that the Council's reputation is never damaged or adversely affected via online communications;
- Rapidly disseminate information to interested parties;
- Adopt a structured approach to using social media that will ensure its use is effective, lawful, and does not compromise Town Council information or its computer systems and networks;
- Encourage users (regardless of whether they are using a personal or official account) to use social media sensibly, responsibly, and in a manner that will not adversely affect the Town Council or violate its policies.

5. Risks Posed by the Use and Misuse of Social Media

The following risks associated with social media use have been identified:

- Breach of GDPR through the accidental or malicious disclosure or loss of personal data processed by the Council;
- Breach of Safeguarding regulations through the dissemination of media relating to minors and other vulnerable people without obtaining appropriate consent;
- Reputational damage to the Council caused by the clumsy or malicious handling of sensitive topics;
- Harassment or abuse of staff, Councillors, and residents through online comment and messaging systems;
- Infection of computer devices from infected sites and malicious links;
- Social engineering attacks and online scams
- Civil or criminal legal action arising from the failure to comply with relevant legal requirements.

6. Responsibilities of Officers and Councillors to Mitigate Risk

Many of the risks relating to the use of social media bear resemblance to the risks and challenges faced by the Council on a regular basis, namely the risks relating to breach of GDPR, breach of safeguarding, risk of reputational damage (albeit that social media has the potential for greater fallout from the poor handling of sensitive topics), and the potential for harassment or abuse as mentioned above.

Horley Town Council's social media channels will be administered by Council Officers. Councillors are welcome to contribute content but generally will not have direct access to

Council operated accounts. The Town Council's social media accounts shall remain separated from the personal, social media accounts of Councillors and Officers, currently facilitated by a Town Clerk Facebook account.

Officers and Councillors involved in the creation and operation of the Council's social media channels should follow the following guidelines:

1. Be aware of and recognise the risks identified in this Communications and Social Media Policy.
2. Remember that you are personally responsible for the content you publish on any form of social media on behalf of Horley Town Council.
3. Never give out the personal details, such as home addresses and telephone numbers, of any person unless you have their express consent. Ensure that any personal or sensitive information is processed in line with the Council's Data Protection Policies.
4. Social media sites are available in the public domain and it is important to ensure that you are confident about the nature of the information you publish. Permission must be sought if you wish to publish or report on meetings or discussions that are meant to be private or internal to Horley Town Council. Do not cite or reference customers, partners, or suppliers without prior approval.
5. Do not use insulting, offensive, or racist language or engage in any conduct that would not be acceptable in the workplace. Show consideration for others' privacy and avoid topics that may be considered objectionable or inflammatory such as politics or religion.
6. In the six-week run up to an election (the "pre-election" period), local or general – councils must not do or say anything that can be seen in any way to support any political party or candidate. It is good practice for Councillors and Officers to avoid using the Council's social media channels in any way that could be construed as favouring a candidate or party and extra care should be used during election periods.

7. The Law and Social Media

This Communications and Social Media Policy, as well as the Council's response to harassment and abuse via social media, is informed by the [Crown Prosecution Service's Guidance on Communications sent via Social Media](#), as well as the following legislation:

- Data Protection Act 2018 (notably including GDPR)
- The Protection of Freedoms Act 2012
- Regulation of Investigatory Powers Act 2000
- Computer Misuse Act 1990
- Crime and Disorder Act 1998
- Human Rights Act 1998

8. Evaluation and Review Date

This policy will be regularly reviewed and updated by Horley Town Council.

This Communications and Social Media Policy was adopted by Horley Town Council on 2 March 2021.

Policy Review Date: 2024