

Thame Town Council

Social Media & Media Relations Policy

1. Introduction / Scope

This policy defines the roles and responsibilities within Thame Town Council ('the Council') for working with the media, and the use of social networking applications by Council employees, elected Members and by other third parties (including contractors) on behalf of the Council. This group of individuals are defined through this policy either as Council Representatives, or where relevant more explicitly as Officers, Members.

The Council welcomes the opportunity to talk to the media and, through them, to debate issues in the public arena, which may appear on social networking applications or sites.

The requirements of this policy apply to all uses of social networking applications, regardless of how the applications are hosted, for any Council-related purposes.

They must also be considered where Council Representatives are contributing 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, e.g. Flickr, Vimeo and DropBox *etc.*
- Social media applications, e.g. Twitter, *Instagram* and Facebook *etc.*

In addition to sharing information with the media through press releases and on social networking applications, the Council also uses its own website, e-newsletter, local radio, posters, A-boards, banners, leaflets and other material to publicise its business and factual information.

All Council Representatives should bear in mind that information shared through social networking applications, even if they are private spaces, are still subject to copyright, data protection, defamation and Freedom of Information legislation.

The use of DropBox by Council Representatives on behalf of the Council is permitted only for Council business and the distribution of such information.

Third Party Users (including contractors) will only be allowed to use the Town Council Social Media or DropBox once authorisation has been given by the Town Clerk.

Use of social networking applications in work time for personal use is not addressed by this policy.

2. Objectives / Aims

The objective of this policy is to protect the reputation of the Town Council by providing a framework to achieve a safe and effective use of social media and working relationship with the media.

The Council is accountable to the local community for its actions and this can only be achieved through effective two-way communication. Local accountability relies upon a genuine understanding of the policies and services that the Council provides.

The media – printed, radio, TV, internet, email newsletters, social networking applications – are crucially important in conveying information to the community. The Council must maintain positive and constructive relations with the media, and work with them to increase public awareness of, and explain, its services, policies and priorities.

The media themselves have a vital role to play on behalf of the local community in holding the Council to account for its policies and actions. It is important that they have access to Council Representatives and to background information to assist them in this role. To balance this, the Council will defend itself from any unfounded criticism and will ensure that the public are properly informed of all the relevant facts using other channels of communication if necessary.

To summarise, the key aims of this policy are to utilise the media and social networking applications to:

- Build a relationship of trust and mutual understanding between the Council, the media and the local community;
- Promote and develop the Council's services and achievements through a variety of mediums as outlined in Section 1 of this policy;
- Invigorate local democracy by promoting alternative channels for communicating to, and engaging with, the public;
- Provide professional, informative and factually correct content which is relevant to the local community;
- Enhance the reputation of the Council using a set of agreed values, i.e. this policy, as the cornerstone.

3. Enforcement / Legal Framework

3.0 Misconduct

Any breach of the guidelines could result in the application or offending content being removed in accordance with the Council's complaints procedure. Any communications or content published that causes damage to the Town Council, any of its employees or third party's reputation may amount to misconduct or gross misconduct to which the Council's dismissal policy applies.

3.1 Code of Conduct

The Council has adopted the statutory Codes of Conduct for Officers and Members and all contacts with the media should be conducted on this basis. In particular, Council Representatives should always have due regard for the long-term reputation of the Council in all their dealings with the media. The Code of Conduct also applies to social media. What is unacceptable offline is unacceptable online. Members of the public, Members or Officers may make a complaint about a Member if they breach the Code of Conduct.

3.2 Libel

If a Council Representative publishes an untrue statement about a person which causes “serious harm” to their reputation, they may sue the Council Representative for defamation. This also applies if a Council Representative allows someone to publish something libellous on a website or social networking application (this includes sharing or ‘retweeting’) but does not take prompt action to remove it. A successful claim may result in an award of damages.

3.3 Copyright

Using images or text from a copyrighted source without permission is likely to breach copyright. Always seek permission in advance and if there is any doubt, then avoid publishing.

3.4 Bias and pre-determination

If a Member is involved in determining planning applications, it is best to avoid publishing anything which suggests they have already made up their mind on the matter. This could be challenged as predetermination and bias, which runs the risk of the decision being challenged or invalidated.

3.5 Confidentiality

Confidential documents, papers and private correspondence should not be leaked to the media, or published on social networking applications. If such leaks do occur, an investigation will take place to establish who was responsible and appropriate action will be taken.

3.6 Obscene Material

The publication of obscene material is a criminal offence and must be avoided.

3.7 Freedom of Information

The Freedom of Information Act 2000 requires that local authorities produce a publication scheme specifying the information that the authority publishes or intends to publish. The publication scheme will be of direct relevance to the media by providing a clear picture of what is available when they are seeking information on behalf of the public. The Town Council’s publication scheme can be viewed online at www.thametowncouncil.gov.uk.

3.8 Defamation Act

The Defamation Act 2013 states that councils must not participate in the publication of defamatory material. A defamatory statement is one “which tends to lower a person in the estimation of right-thinking members of society generally or to cause him/her to be shunned or avoided or to expose him/her to hatred, contempt or ridicule, or to convey an imputation on him disparaging or injurious to him/her in his office, profession, calling, trade or business”.

3.9 Sensitive Information

The Council reserves the right to withhold certain sensitive information concerning commercial transactions, for example the purchase and sale of land and property. This applies to its own commercial interests and to the various parties involved in individual business transactions with the Council. So, for example, to protect a negotiating position, details of an offer made for the purchase of a property would not be revealed to the media. This area and other matters are guided by Schedule 12A of the Local Government Act 1972, the Data Protection Act 1998 and exemptions under the Freedom of Information Act 2000.

When the media wish to discuss an issue that is, or is likely to be, subject to legal proceedings then the Town Clerk should be consulted and if necessary legal advice will be taken before any response is made.

3.10 Personal Information

There are a number of personal privacy issues for Officers and Members that must be handled carefully and sensitively. These include the release of personal information such as home address and telephone number (although Member contact details are in the public domain); disciplinary procedures and long-term sickness absences that are affecting service provision. In all these and similar situations, advice must be taken from the Town Clerk before any response **is made to the media.**

3.11 Data Protection

Avoid publishing the personal data of individuals unless their express written permission is given.

3.12 Safeguarding

Avoid publishing anything that could cause safeguarding or vulnerability issues.

4. Terms of Use / Management

The following forms of use apply to all uses of social networking applications by all Council Representatives

- 4.1 New profiles, new groups or use of existing social media sites will only be created with the approval of the Town Clerk.
- 4.2 Any use of the Town Council's social networking accounts on personal devices by Council Representatives must be authorised by the Town Clerk.
- 4.3 Use of existing social media sites or the creation of new profiles and groups will only be agreed if a clear business need and target audience can be proven, and sufficient resources are made available to maintain it and (where appropriate) respond to feedback generated by the service.
- 4.4 Social networking applications:
 - a) 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 Town Council into disrepute.
 - b) must not be used for party political purposes or specified campaigning purposes
 - c) must not be used for the promotion of personal financial interests, commercial ventures or personal campaigns
 - d) must not be used in an abusive or hateful manner
 - e) must not breach the Council's codes of conduct or other policies such as equal opportunities and bullying and harassment.
- 4.5 It is 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 Council Representatives must:

- a) only use @thametowncouncil.gov.uk email addresses for user accounts on official Council business;
- b) publish appropriate feedback and complaints information in a prominent place which is easily accessible to users, and formally log all messages received on social media using the Council's compliments and complaints procedure, where managing social networking applications;
- c) only use the Council's logo and other branding elements where appropriate. The logo should not be used on applications which are unrelated to or are not representative of the Council's official position;
- d) identify themselves as such where appropriate on social networking applications, (for example, through additional information in user profiles);
- e) ensure that any contributions they make are professional and uphold the reputation of the Council;
- f) not promote or comment on political matters or issues that be regarded as such;
- g) use a disclaimer such as "the postings on this site are my own and do not necessarily represent the Council's position, strategies or opinion", if publishing content online relevant to Council business in a personal capacity;
- h) know and follow the Terms of Use of third-party social media sites (such as Facebook) when contributing to them;
- i) comply with data protection, intellectual property and copyright laws;
- k) not publish or report on confidential conversations or business;
- l) monitor social media channels effectively to ensure that defamatory, abusive or derogatory comments are removed as soon as practically possible;
- m) ensure a disclaimer is present on all sites which explain that comments made by the public are not those of the Council;
- n) not publish images of children, unless consent has been given in writing, using an official photograph consent form;
- o) not download any software, shareware or freeware from any social media site, unless this has been approved and authorised by the Town Clerk.

5. Responding to approaches from the media

The media contact the Council for many different reasons, for example to follow up a story after receiving agendas or minutes; to ask for the Council position on a more general story affecting other authorities or organisations; to look for a local perspective on a national story. These approaches are usually made by phone or in person, perhaps following a committee meeting.

Approaches from all national press, radio or TV stations or specialist press should be directed to the Town Clerk who will discuss the nature of the story and then contact the appropriate Council Representative asking them to respond.

To ensure that the balance of committee debate is not compromised, Members are encouraged not to speak to the media between the distribution of committee papers and the close of the meeting.

All Council Representatives should respond in a helpful manner to approaches from the media and with respect for their deadlines. Everyone in the media works to tight deadlines, but if necessary take five minutes to gather your thoughts and call back promptly. Always make it clear whether you are expressing your own opinions or those of the Council.

It should never be appropriate to say “no comment”. If necessary provide a holding response or find someone who is in a better position to comment, i.e. the Town Clerk.

6. Proactive approaches to the media

As well as responding effectively and punctually to requests for information from the media it is important to be proactive in seeking out stories that provide a more rounded picture of the work that goes on behind the scenes. As the local media all receive copies of agenda papers, most of their approaches relate to items being discussed by committees. They are less likely to be aware of individual projects and initiatives, the receipt of grants, appointment of new staff, VIP visits, human interest stories, etc.

The Council produces a weekly e-newsletter in line with the guidance set out in the policy. The e-newsletter allows the Council to effectively distribute regular, factual and relevant information to the local community and media. The Council also produces an annual Town Guide which is updated on a yearly basis, following requests from the public, to ensure that all information is factually correct and relevant. All requests for information to be updated or included must be approved by the Town Clerk.

It is important to obtain advice from the Town Clerk on any issues that are likely to be complex or contentious or to be sustained for any length of time, preferably before the issue becomes public knowledge. In such a situation the Town Clerk will work with the relevant Council Representatives to produce a communications plan which will ensure that balanced, timely information is provided to keep all parties informed.

For some major issues it may be useful to run briefing sessions for the local media to give them a fuller understanding of the issues and to provide an opportunity for them to ask questions.

Caution should be exercised when submitting letters to the editor for publication in newspapers. There are occasions when it is appropriate for the Council to submit a letter, for example to explain important policies or to correct factual errors in letters submitted by other correspondents. Letters representing the views of the Council should only be submitted by the Town Clerk. If Council Representatives choose to use the letters page to express their own opinions on council policies they are strongly encouraged to check the facts first with the appropriate Council Representative. It should always be made absolutely clear whether the views put forward are those of the Council or of an individual Member. At all times consideration should be given as to how the correspondence may affect the reputation of the Council.

7. Press Releases

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 Council Representatives to look for opportunities where the issuing of a news release may be beneficial. Any Council Representative may draft a press release but it may only be issued when it has been signed off by the Town Clerk.

Press releases for partnership projects require particular care and it is important that the draft text is agreed by all relevant parties. The lead partner would normally issue the release but the particular role of Thame Town Council should be clearly stated.

8. Setting the record straight

The media are at liberty to report stories using any angle they feel is appropriate and we can only hope to influence them through continuing our good working relationships. Limitations of time and space mean that you should expect serious editing of your quote or interview. Assume that anything you say to a journalist will be reported. There is no such thing as 'off the record.'

There may be occasions when you feel you have been misquoted or where important facts have not been accurately reported or where you feel the reporting has been particularly unfair. This can often be rectified using the 'corrections' column in a newspaper or, if the complaint is serious enough, by a short broadcast setting out the facts or apologising. This would normally be dealt with through discussions with the editor.

Where comments are made on social media, the policy is not to respond unless absolutely necessary.

In all cases where it is felt necessary to set the record straight advice should be taken from the Town Clerk before any action is taken.

9. Care during periods of heightened sensitivity

The period just before local elections, when there are restrictions on local authority publicity and rules concerning media reporting of the election campaign, is traditionally known as the 'purdah' period. However, it is now more often referred to as the 'pre-election' period and is defined as beginning with the last date for publication of notice of the election.

During the period between the notice of an election and the election itself, local authorities should not publish any publicity on controversial issues or report views or proposals in such a way that identifies them with any individual Members or groups of Members. Publicity relating to individuals involved directly in the election should not be published by local authorities during this period unless expressly authorised by or under statute. It is permissible for local authorities to publish factual information which identifies the names, wards and parties of candidates at elections.

10. Advice and training

All Council Representatives should be made aware of this policy and how it affects them through induction, training and update programmes and through discussion with the Town Clerk.