

Clerks Report to: Broadclyst Parish Council

Date of Meeting: 5 June 2017; **Agenda item:** 17/112

Subject: Media Communications Policy

Purpose of report: to present a revised media communications policy which has been updated to cover the use of social media

Recommendation:

- i. that that report be noted
- ii. that the Council resolves to adopt the revised policy

Financial implications: **Medium:** there is a cost in terms of Officer time to monitor and respond to interactions on social media. Improper use of the Council's social media pages could leave the Council open to prosecution. Although Council is insured against claims involving the internet, claims are subject to a limit of indemnity of £50,000 with £500 excess.

Legal implications: **Medium:** It is an offence to send, deliver, or transmit communications which are indecent, offensive, threatening, or false¹; this extends to social media², however caution requires consideration against the right to freedom of speech³. Case law confirms inappropriate use of social media provides evidence for prosecution under other acts and statutes⁴

Equalities impact: **Medium:** Social media tools may not be accessible to everyone, for example, screen reader software used by a person with a visual impairment may not be compatible. This would cause a negative impact. All posts will be in English which could impact negatively on people whose first language is not English. Therefore, social media must not be used as the sole method of communicating.

Risk: **Medium:** Social media is a platform through which the Council is viewed and is a powerful communication tool. Inappropriate use of social media could lead to loss in public confidence in the Council; an adopted social media policy mitigates against this. The Council is under a statutory duty to maintain high standards of conduct under s.27(1) of the Localism Act 2011 in relation to its members, and has adopted its own Code of Conduct⁵.

Link to Council Action Plan: to distribute local news and community information

¹ Malicious Communications Act 1988; s1

² Communications Act 2003, s127

³ Article 10, European Convention on Human Rights

⁴ the Fabrice Muambe Twitter case which saw the imprisonment of a student under the Crime and Disorder Act 1988.

⁵ <http://www.broadclyst.org/index.php/parish-council/policies>

INTRODUCTION

WHAT IS A POLICY?

The Good Governance Standard for Public Services defines the role of the Parish Council (as a governing body) as “...to direct and control the organisation in the public interest and to ensure accountability to the public.” (The Independent Commission on Good Governance in Public Services, 2004)

Part of achieving this is by identifying and minimising risk to the Council and its operation; a policy is an adopted document which gives guidance and structure to an element of the Council’s operation. Policies do not stand alone, but accompany Standing Orders, which are the Council’s written rules and underpin everything Council does (Tharmarajah, 2013), providing an operational framework for Council, committees, staff and volunteers.

THE EFFECTIVE POLICY

An effective policy should be in plain English and be robust; it should identify what must be done, what to do should certain circumstances arise, what could happen and what the proper response to that situation is. It forms part of Council’s risk management by identifying potential undesirable / harmful outcomes; it sets out prescribed, standardised actions and puts preventative measures in place. A policy can also set out what sanctions could be imposed for non-compliance and breeches.

The aim of this policy is to protect the council’s reputation and its employees.

POLICIES REVIEW

To remain effective, policies need to be reviewed regularly. This is usually in accordance with the review schedule, but with inbuilt flexibility to enable updates and reviews to take place at any time, such as when a change to legislation or working practices is identified. Membership of NALC⁶, SLCC⁷, reading sector publications such as ‘The Clerk’, attending sector-specific conferences such as the Practitioners Conference, and following sector media feeds are all ways in which local councils can be sure to keep up to date with legislative changes.

A review schedule is maintained in the office, a copy of which is appended to this report (Appendix A.)

Council’s existing Media Communications policy was adopted in March 2014 but does not include reference to social media. This has been identified as a weakness in the routine review of this policy. Reports to Council in March and April 2017⁸ highlight the Council’s growing social media presence; putting a notice on the village noticeboard is no longer an adequate way of engaging with the community.

At the 2017 Practitioners Conference (Day, 2017), communication expert Nick Day demonstrated that social media now represents the most efficient way of reaching electors, with a staggering 82%

⁶ <http://www.nalc.gov.uk/> (National Association of Local Councils)

⁷ <http://www.slcc.co.uk/> (Society of Local Council Clerks)

⁸ <http://www.broadclyst.org/index.php/parish-council/meeting-documents/meeting-documents-2017>

of adults (41.8 million) in Great Britain in 2016, compared with 78% (39.3 million) in 2015 and 35% (16.2 million) in 2006 going online almost every day. (Office for National Statistics, 2017). The Community Planning Toolkit echoes this, stating that “Community engagement works best where it is an ongoing cumulative process enabling relationships and trust to build and strengthen over time” (Community Places, 2014) and social media provides an opportunity for Councils to do just this.

Caveat: Safar and Mahdi (Safar and Mahdi, 2012) note that network distances can have very little in relation to geographical distances. Sole reliance on social media responses could give Council a view which is not truly representative of its local electorate.

There have been two recent examples where the Council has been in the public eye more than is usual: national media interest in parish precept increases, partly due to parishes taking on devolved services (BBC, 2017) and locally in the unprecedented level of growth in the Exeter and East Devon Growth Point⁹

EVIDENCE OF ONLINE ENGAGEMENT

In March 2017, the Parish Housing Needs Survey was promoted on Facebook using the ‘boost post’ feature. Statistics for the post show it reached 1,826 people, resulting in 455 engagements¹⁰. The response to the housing needs survey before social media promotion was a worryingly low 6% from 2,000 surveys. What isn’t quantifiable is whether or not the respondents would have taken part in the survey in any case, but when one considers the extra promotion only ran for the last 7 days of a 6-week consultation period it’s reasonable to conclude these engagements were ones which would not have happened otherwise.

A recent image of the village gateway flower-bed shared on Twitter reached 2,253 people, instigating a conversation with a Canadian resident; social media observes no geographical or social bounds.

POLICY PREPARATION

The existing policy is robust and offers guidance and clarity over how to respond to a wide range of situations. When researching wording for social media policies, content from published policies by Cornwall Council¹¹, Bruton Town Council¹² and Hazlemere Parish Council¹³ was considered. Having evaluated the policies of these 3 Councils of differing sizes and operation it became apparent that the media policy content was very similar and so no further research was pursued.

Adoption of the updated policy (see appendix B; section 17 contains the insertion which relates specifically to social media) will provide clarity on the use of social media, as well as setting out sanctions for failing to observe the Council’s adopted policy.

⁹ <http://www.exeterandeastdevon.gov.uk/>

¹⁰ An ‘engagement’ is a click that results in the reader interacting with the website link

¹¹ <https://www.cornwall.gov.uk/council-and-democracy/council-news-room/the-communications-team/social-media/>

¹² <http://brutontowncouncil.gov.uk/policies/social-media-policy/>

¹³ <https://www.hazlemereparishcouncil.org.uk/policies-and-documents/social-media-policy/>

MONITORING AND PERFORMANCE MANAGEMENT

“A relevant authority must promote and maintain high standards of conduct by members and co-opted members of the authority.” (Localism Act 2011, 2011)

The Parish Council has adopted a Code of Conduct for its Members and staff, both of which should act in such a manner as to uphold the principals of public life and to not bring the Council into disrepute. Whilst the Codes cover general behavior “...behave as to give [...] the impression that you are acting as a representative of the Council”, neither Code relates specifically to social media communications.

As highlighted at the beginning of this report, monitoring interactions via Council’s social media pages has an officer time factor. An adopted medial policy which includes clarification on how to respond to public comments mitigates against potentially time-consuming activity which does not make best use of officer time under cost-benefit analysis.

Corporate social media pages therefore require skilful management, deserving the same level of professionalism automatically applied to traditional methods of communication; a solid policy guides and enables Council Members and Officers in this process.

EQUALITIES IMPACT

Social media will present some barriers e.g. people who use assistive technology that is not compatible but it will not be used as the only form of communication.

The policy promotes good practice and so will protect all equalities groups from bullying, harassment and victimisation.

CONCLUSION

The updated policy provides a useful toolkit to enable Council Members and staff, some of whom may not be familiar with social media, to use sites such as Facebook, Twitter, and Pinterest to promote its work, advertise community events, and to engage with a wider section of the community than it has in the past.

This concludes my report to Council.

Angie Hurren

MILCM

Broadclyst Parish Council Clerk

29 May 2017

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Appendix A – Policy review schedule

Broadclyst Parish Council					
POLICY AND PROCEDURE REVIEW SCHEDULE					
	Policy	Review	Last	Last	Review
	Adopted	Frequency	Review	Updated	Due
Anti-bribery Policy	Nov-13	2-yearly	Mar-15	N/A	Mar-17
Anti-harrassment Policy	Nov-13	2-yearly	Mar-15	N/A	Mar-17
Data protection policy	Feb-14	2-yearly	Mar-15	N/A	Mar-17
DBS Data Handling Policy	Sep-14	2-yearly	Mar-15+	Mar-15+	Mar-17
Equalities Policy	Feb-14	2-yearly	Mar-15	Mar-15+	Mar-17
Freedom of Information Policy	Feb-14	2-yearly	Mar-15	Mar-15+	Mar-17
Media Communications Policy	Mar-14	2-yearly	Mar-15	N/A	Mar-17
Code of Good Practice for Planning	Jan-15	Annually	Apr-16+	Apr-16	Apr-17
Employees Code of Conduct	Nov-13	2-yearly	Mar-15	Mar-15	May-17
Delegation Scheme*	Jan-16	2-yearly	N/A	N/A	Jun-17
Employees handbook	Jan-10	2-yearly	Mar-15	Jan-14	Jun-17
Vegetation Clearance Policy	Sep-15	2-yearly	Oct-17	N/A	Sep-17
Grievance Procedure	Nov-13	2-yearly	Oct-15	N/A	Oct-17
Health and Safety Policy	Nov-13	2-yearly	Mar-15	N/A	Oct-17
Meeting Protocols	Oct-14	Annually#	Oct-16	Oct-16	Oct-17
Anonymous Comms. Policy	Nov-15	2-yearly	N/A	N/A	Nov-17
Delegation of Powers to Clerk	Mar-15	2-yearly	Dec-15+	Dec-15	Dec-17
Lone Workers Policy	Dec-15	2-yearly	N/A	N/A	Dec-17
CCTv Policy	Mar-14	2-yearly	Jan-16	N/A	Jan-18
Financial Regulations	Dec-13	Annually	Jan-17	May-14	Jan-18
Risk Management Policy	Feb-14	Annually	Jan-17	Jan-17	Jan-18
Standing Orders	May-13	Annually	Jan-17	Aug-14	Jan-18
Training Policy	Mar-14	2-yearly	Jan-16	Jan-16	Jan-18
Complaints procedure	Mar-14	2-yearly	Feb-16	N/A	Feb-18
Members Code of Conduct	Apr-14	2-yearly	Apr-16	N/A	Apr-18
Record Management Policy	Mar-14	2-yearly	Apr-16	N/A	Apr-18
Recording of Meetings Policy	Sep-14	2-yearly	Oct-16	N/A	Oct-18
Whistleblowing Policy	Nov-13	2-yearly	Mar-17	N/A	Mar-19

Key:

* Policies marked with an asterisk to be reviewed after each Annual meeting of the Council

+ Policies marked + have been updated outside of the review schedule as changes have been identified as needed

frequency of review changed

Reflection:

We live in a world which is rapidly evolving, yet the local government sector operates within a legislative framework which does not always keep pace with other rates of development. Councils are sometimes unfairly accused of being slow and out of touch with modern times, yet this can arise through operational constraints rather than poor governance.

There is much debate around the topic of “are humans lazy by nature?”, with many studies concluding that yes, we are inherently lazy, stemming back to our ancestral need to conserve energy output for the next hunt. The internet feeds beautifully into this evolutionary programming, with home delivery and social media enabling the couch-potato to not just exist but thrive in his natural habitat.

Is the couch potato lumbering along like just another creep of Darwin’s tortoises? No, far from it – like sitting ducks, they kindly provide a captive audience to social media page-managers who can penetrate their lives in ways which range from the subliminal to deliberately provocative in order to stimulate a response. Once trained, the dedicated follower will exhibit a Pavlovian response to clickbait; “liking”, commenting on, and sharing our news; generally interacting in a manner which contrasts sharply with their usual indifference.

As with all good inventions, there is a down-side. The birth of Six Degrees, the very first social media site which was launched in 1997, also bore its twin - the keyboard warrior. The ease with which opinions can be shared presents an often-irresistible chance for amateur judges and juries to pronounce sentence on the world.

Reviewing and writing this policy has led me to conclude that Social media is a powerful and useful tool for today’s Local Council, but as with all tools it is imperative one understands how to use it in the proper manner. The social media policy is the instruction book; its content provides PPE for its users.