



Communications and Media Protocol

Introduction

This protocol acts as a reference tool for any employee or councillor of Credition Town Council (CTC) who engages with the media or communicates with members of the public. It also includes guidance on personal use of social media where it could be deemed to have a negative impact on CTC's reputation.

This protocol applies to all CTC employees and councillors.

CTC receives enquiries from the media, constituents and wider members of the public every year. The purpose of this protocol is to clarify the roles and responsibilities of the Town Clerk, Mayor, all employees and all councillors and provides guidance on how to handle media interest. The aim of the protocol is to ensure that CTC is seen to communicate in a professional and objective manner. In all cases, CTC's outside communications should be:

- Open and honest
- Proactive
- Responsive and timely.

Where this policy relates to an employee, appropriate adopted policies may be used such as the disciplinary procedure.

Where the policy relates to a member, concerns may be dealt with informally by the Town Clerk and/or the Mayor, or a complaint will be referred to the Monitoring Officer.

Definitions

CTC may use artificial intelligence (AI) tools such as Microsoft Co-Pilot to assist with drafting wording for press releases, newsletters, or social media posts. However, AI will not be used to generate imagery or to replace bespoke design work created by staff or professional designers. All AI-generated content will be reviewed and personalised by the member of staff and approved by the Town Clerk before publication to ensure it aligns with CTC's values and policies.

Legal Issues

There are circumstances under which employers can be held legally responsible for content published by their employees. This may include action taken as part of their role for the organisation and material published on official organisation channels or somewhere that has been previously sanctioned by CTC. It is therefore important to make all employees aware of the potential legal issues with regards to communication. It is important that employees are aware that communicating information about CTC cannot be isolated from their working life. For example, any information published online can be accessed around the world within seconds and will be publicly available for all to see.

Employees and councillors should take the following into consideration when using social media:

- Be aware of CTC guidelines for using social media, whether this is for personal use or as a part of their working role (See 'SOCIAL MEDIA')

- Be familiar with the legal areas outlined below before writing or speaking about colleagues or sharing information about CTC
- Ensure that verbal or written information does not disclose privileged or confidential information.

Libel and defamation

Defamation is the act of making a statement about a person or company that is considered to harm reputation, for example, by lowering others' estimation of the person or company, or by causing them to lose their rank or professional standing. If the defamatory statement is written down (in print or online) it is known as libel.

There are exceptions to this - posting a defamatory statement online or recording it on a podcast would both be examples of libel.

Other points to note

An organisation may be held responsible for something an employee or councillor has written or said if it is on behalf of the company or on a company-sanctioned space. Action can also be taken against anyone repeating libellous information from another source, so careful checks are needed before quoting statements from websites. This can also apply to linking to defamatory information. You should consider whether a statement can be proved before writing or using it; in law, the onus is on the person making the statement to establish its truth.

Publicity

The media plays a huge role in informing residents about what CTC does and how it spends their money (this applies to at all tiers of government).

It is therefore vital that CTC communicates effectively with the media and wherever possible will take a positive approach to meeting media requests for information and interviews.

This approach will help achieve the following objectives:

- Ensure that CTC is recognised as one which is open, accountable, accessible and which listens
- Share and celebrate CTC's successes
- Give information about policies and services and about the democratic process so that people feel more informed about the work of CTC
- Handle negative issues clearly and decisively.

Publicity in Election Periods

The rules governing publicity change when an election has been announced. In the period between the notice of an election and the election itself all proactive publicity about candidates or other politicians is halted. This applies to local and national elections. During this period, council publicity should not deal with controversial issues or report views, proposals or recommendations in a way that identifies them with individual councillors or groups of councillors. This is to make sure that no individual or political party gains an unfair advantage by appearing in corporate publicity. In these circumstances, where a quote is required, the relevant officer may be quoted, in accordance with the guidelines in this protocol.

Young People and Publicity

Guidelines should be followed if commissioning photographs of children (i.e. under 18 years of age) or if planning photography of children at events and using visual media for publicity purposes. Please refer to CTC's Safeguarding Policies for further information on this subject.

Tone and Style

All CTC communications should follow a consistent tone and style that reflects professionalism, accessibility, and openness. A friendly, respectful, and informative tone is encouraged, avoiding jargon and using plain language wherever possible.

Digital Accessibility

CTC is committed to ensuring that its digital communications are accessible to as wide an audience as possible. This includes using alt text for images, avoiding overly complex formatting, and ensuring compatibility with screen readers and assistive technologies where feasible.

The Media

The local press generally only covers stories relevant to people living and working in Crediton and the immediate surrounding areas. They include the Crediton Courier (paid for) and community magazines. Other local media include radio stations such as Radio Exe, BBC Radio Devon and Heart, all of which have specific target audiences. Regional media includes newspapers like the Western Morning News and online news sites like Devon Live. It is rare that CTC would be involved in media communications at a national, international or specialist level however the protocol remains pertinent in these cases.

Identifying Newsworthy Items and Handling Media Enquiries

It is the responsibility of everyone working within CTC to identify worthy news items and this should be done as early as possible. These might include Mayoral engagements, CTC events or promoting successes. Ideas for news items should be sent to the Town Clerk or the Events and Town Centre Officer. Staff will co-ordinate all media enquiries into the office. In certain circumstances it may be appropriate for the lead officer, councillor or the Mayor to respond to the enquiry, in line with this protocol. Officers who are directly approached by a member of the media should not attempt to answer questions themselves without gleaning the full facts and should confer with the Town Clerk before responding. However simple, factual queries will be dealt with appropriately by the office. Councillors who are directly approached by a member of the media may respond in accordance with the guidance contained in this protocol. No individual member of staff or councillor should pass comment on leaks, anonymous allegations or allegations about individual staff and councillors. CTC is open and accountable and should always explain if there is a reason why it cannot answer a specific enquiry.

News or Press Releases

News or press releases are one of the key techniques for publicising CTC's activities, decisions and achievements.

There are two types of press releases - Official Council Press Releases and Councillor Press Releases.

Official Council Press Releases

An official Council release is made on behalf of CTC as a whole; it will be written by an officer and authorised by the Town Clerk. It is non-party political and will normally include a quote from the relevant councillor(s). This is usually the Mayor or Committee Chair. Official Council press releases will follow a corporate style appropriate for the media being targeted and a central record will be maintained. All releases will accurately reflect the corporate view of CTC, contain relevant facts and include an approved quotation from the appropriate councillor. Matters of style, presentation, punctuation, grammar etc are the responsibility of the author. Releases will not promote the views of specific political groups, publicise the activities of individual councillors, identify a political party or persuade the general public to hold a particular view. All official council news/press releases will be placed on the council's website within one working day of issue. It should be borne in mind that a news or press release is not always the best way to publicise an activity or event and alternative ways of advertising it should be considered e.g. posters, mailings, websites, social networking etc.

Councillor Press Releases

Councillor press releases are personal and are written and issued by the councillor responsible. This release may or may not be political and should not include the title 'councillor', name of any officer, use the council crest or the council telephone number as a point of contact. It would be beneficial for

copies of intended releases, especially those of a factual nature, to be provided to the Town Clerk. Councillors seeking advice can contact the Town Clerk for advice.

Interviews

Any officer contacted by a journalist requesting an interview should refer the journalist to the Town Clerk, the Mayor or the appropriate Committee Chair. The person put forward for interview will depend on the situation and the information required by the journalist. Officers should never give their opinion on specific CTC policy but must keep to the corporate line and key messages. Their role is to provide expertise and factual knowledge only, in support of CTC's approved and agreed policies.

Media Activity Ahead of Meetings

The media pick up many stories from agendas and reports ahead of meetings. All Council and Committee agendas are automatically published on the CTC website. Members of the media are welcome to attend and regularly do attend meetings. During meetings, councillors should be mindful that any comments and messages are put across in a manner which gives the journalist an accurate picture, rather than relying on the journalist's interpretation of what can be a complex issue or report.

Media Crisis Response

In the event of a crisis or potentially damaging issue, a coordinated response will be led by the Town Clerk (or Deputy Clerk in their absence) in consultation with the Mayor and the relevant Committee Chair. Holding statements should be prepared promptly, and all media contact will be channelled through the Town Clerk unless otherwise agreed.

Non-Council Related Media Activity

Staff and councillors who have contact with the media in a personal capacity or as members of non-council related organisations must not refer to CTC posts and must make it clear to the journalist concerned that they are speaking in a personal capacity or on behalf of the non-council related organisation.

Managing Negative Issues

From time to time, CTC has to respond to negative issues. It is important that these situations are managed carefully to limit the potential for negative publicity. Staff and councillors must alert the Town Clerk as soon as a potentially negative issue which may attract media interest comes to light. They should not wait until contact is made by the media. Staff and councillors must be prepared to work together to prepare holding statements, other information and carry out research even if no media have contacted CTC about an issue.

Correcting Inaccurate Reporting

Should the media (a newspaper or broadcaster) publish/broadcast something inaccurate about CTC, a quick decision needs to be taken on any action necessary to correct it. The issue should be discussed with the Town Clerk to decide what action is appropriate. This could be a letter or news release, a conversation with the journalist concerned, a personal letter to the editor or legal advice. It is also necessary to decide who the most appropriate person is to take the necessary agreed action i.e. the Mayor, Committee Chairman or Officer. It should be noted that in the case of minor inaccuracies which have little or no impact on the message being conveyed, it can sometimes be counterproductive to complain. Each case must be judged individually. Occasionally, CTC will get something wrong. In these cases, damage limitation is the key; this can usually be achieved by holding hands up, apologising, and stating how we are going to learn from the error or put it right.

CTC Newsletter

CTC publishes a newsletter on a bi-monthly basis. Whilst available online, it is also available in hard copy which enables CTC to reach more local people who do not have access to the internet/social media. Content is created in house in consultation with any appropriate councillors. Ideas for articles are welcomed, and these should be passed directly to the Town Clerk or Deputy Clerk.

Social Media

'Social media' is the term commonly given to websites, online tools and other platforms which allow users to interact with each other in some way, by sharing information, opinions, knowledge and interests.

As the name implies, social media involves the building of communities or networks, encouraging participation and engagement.

This protocol will also apply to any new or emerging technologies or systems which may develop in the future. Current examples include (but are not limited to) podcasts, message boards, social networking sites, such as Facebook, X, Instagram and SnapChat, and content sharing websites such as YouTube.

The aims of this protocol are:

- To ensure that social media used to communicate with the public, partners or other stakeholders by all staff in the performance of their duties is aligned to the views of CTC
- To ensure that all CTC media sites are easily identifiable as originating from CTC and correctly apply the council's logo and brand guidelines
- To protect the reputation of CTC while embracing the possibilities of this communications channel
- To ensure that any CTC communication through social media meets legal requirements and is consistent with other communication activities
- To prevent the unauthorised use of CTC branding on employees' or councillors personal social media sites.

CTC recognises that social media is an effective means of communication and will operate a number of social media channels as part of its communications.

CTC aims to use social media to support two-way communication with the community but recognises that it is not always appropriate to respond to every message/comment, publicly or otherwise. For complex issues users should be referred to traditional forms of communication e.g. email or telephone.

Applying this protocol: Council-run channels

- CTC staff considering the use of, or wishing to use, social media as a channel for a project or campaign must first discuss and agree this with the Town Clerk and Mayor
- Social media channels already featuring CTC's logo or branding must comply with brand guidelines
- The unauthorised use of the CTC logo or branding on social media channels may result in action under the disciplinary procedure
- Individual employees must not post any items on sites unless this has been reviewed by the Town Clerk before publication to avoid unintentional errors or misrepresentation. A clear audit trail should be maintained for significant posts.

Applying this protocol: personal use of social media channels

If you already make reference to your employment/involvement with CTC on a personal digital site as defined above, or you intend to create such a site, you should inform the Town Clerk who will advise you of the appropriateness of doing this in line with the advice below:

- Do not engage in activities on the internet that might bring CTC into disrepute

- Do not use the CTC logo on personal web pages
- Do not reveal information which is confidential to the Council - consult the Town Clerk if you are unsure
- Do not include contact details or photographs of service users or staff without their permission
- Under no circumstance should offensive comments be made about CTC, councillors, or colleagues on the Internet. This may amount to cyber-bullying or defamation and could be deemed a disciplinary offence. Social media campaigns Employees or Councillors who are considering social media campaigns should firstly consult the Town Clerk for guidance. Coordinating efforts and using the Town Council corporate account can ensure that the project has a clear purpose, fits into the existing Town Council views and is suitable for the target audience they wish to reach.

Replying to messages and comments on Social Media

Social media channels should be monitored effectively during office hours, acknowledging that all staff are responsible for this and that workloads will vary day-to-day.

Monitoring is essential to ensure that defamatory, abusive or derogatory comments or messages are removed as soon as practically possible. The following steps will be taken to ensure appropriate use of CTC social media platforms:

- Screenshots will be taken before removing such comments to provide an audit trail and evidence if required
- CTC reserves the right to restrict ('turn off') comments on individual posts where comments are irrelevant to the original post, are offensive or trolling in nature (or otherwise not conducive to a balanced discussion), or where they should be directed elsewhere (e.g. a consultation link or to another authority)

Where comments from the public are made on CTC social media posts, the policy is not to respond unless absolutely necessary. Where a reply is considered necessary a standard, single response should be: '[summarise answer to query / signpost to relevant info] and that will not be commenting on this further via social media, so any further questions should be directed to [email] or [relevant meeting].'

CTC reserves the right to post on its social media pages, with commenting disabled features. This will be considered on a case-by-case basis by officers.

CTC reserves the right to turn off commenting on any post, following agreement between the Town Clerk and Chair of the Council which will be documented to provide an audit trail.

Responding to CTC matters via social media should be done using council channels within office hours, unless the enquiry is an emergency or urgent matter.

Where direct messages are received via CTC's social media channels, an automatic reply will be sent advising that messages should be emailed to CTC's main email address, and that social media direct messages will not be monitored or responded to.

CTC reserves the right to block any profile who regularly breaches the policy, following agreement between the Town Clerk and Chair of the Council which will be documented to provide an audit trail.

Social Media Tips and Advice

Social Media or Social Networking is both a broadcast medium and a receiving medium. From the business point of view:

- It can be used as a receiving medium to gather opinions about CTC which have appeared on social media networks. As such it is an invaluable tool to add to our understanding of what people think about us
- It is possible to broadcast using the same social media networks to engage with and talk to those who are interested enough to have a view. As such it is a useful and powerful tool.

From a personal point of view:

- Individuals employed by CTC are entitled to use whatever system they like outside of their working time and working persona, to engage in the social aspects of the media – both broadcasting and receiving
- However great care should be taken to ensure the private/work line is not crossed
- It is good practice to follow the stricture of never mentioning work, your opinions of your colleagues or processes and projects on your own private Social Media networks. This aspect is covered in 'LEGAL ISSUES'.

The protocol at Appendix 1 will be used.

Data Protection and Freedom of Information

Councillors are reminded that they must not misuse CTC resources for political or other inappropriate purposes. Should CTC receive a request for information under the Freedom of Information Act 2000 on a topic on which there is correspondence (email or written), normally that correspondence would have to be disclosed, unless it was exempt. The fact that the disclosure of the correspondence may prove embarrassing would not, in itself, prevent disclosure. In addition, care should be taken when processing personal data. The Data Protection Act 1998 prevents the use of personal information other than for the purposes for which it was supplied. Councillors should bear this in mind when using any personal data which may be supplied to them by their constituents.

Internet Acceptable Use Policy

Internet use covers all websites (including the CTC website), networking sites such as Facebook, X, Instagram etc, forums and blogs which may be used by both staff and councillors. If the above are used in an official capacity or for CTC related business, the guidance in this protocol must be adhered to and they must be used in a responsible and appropriate manner.

Under the consideration of Acceptable Use, when acting in the capacity of CTC, websites should not:

- contain content that may result in actions for libel, defamation or other claims for damages
- be used to process personal data other than for the purpose stated at the time of capture
- promote any political party or used for campaigning
- promote personal financial interests or commercial ventures
- be used for personal campaigns
- be used in an abusive, hateful or disrespectful manner
- If social media is used in an unofficial capacity, staff and councillors should restrain from making remarks that could be construed as bringing CTC into disrepute. Please see "SOCIAL MEDIA".

ADMINISTRATION OF INSTAGRAM AND FACEBOOK

CTC encourages open and two-way conversation with constituents, partner agencies, members of the many communities in which it participates and the general public.

Such dialogue is crucial in our effort to engage with members of the public and to support our values of openness, fairness, flexibility and teamwork.

CTC expects all employees and councillors to exercise personal responsibility when participating in social media. This includes not breaching the trust of those with whom you are engaging.

General operating guidelines:

1. Do not publish any information which is not already in the public arena.
2. Be accurate, fair, thorough and transparent.
3. Ask a colleague or councillor to check wording for accuracy.
4. Be mindful that what you publish may be public for a long time.
5. Respect copyright laws.
6. Do not publish or report on conversations that are meant to be private or internal to CTC without permission.
7. Do not cite or reference customers, partners or suppliers without their approval.
8. When you do make a reference, link back to the source where possible.
9. Respect your audience. Do not publish anything that would not be acceptable in the workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory, such as politics and religion.
10. Remember that you are an ambassador for the council and be cordial at all times.
11. Do not correct other contributors' spelling or grammar.
12. If a contributor makes a comment that is defamatory or likely to cause extreme offense, edit or remove it where possible. If this is not possible, report it to the operator of the website. Contact the user to explain why you took this action, and if appropriate ask them to post the comment again without the offensive content.
13. All feedback to CTC through social networking sites should be fed back to the Town Clerk, and as appropriate, Full Council. Feedback that requires a response must be acknowledged promptly. Where action is required, bear in mind that excessive delay will have a negative impact on the council's reputation.
14. Passwords for Town Council social media sites must not be shared with any unauthorised persons and these must be changed when a member of staff leaves office.

Authorisation:

Types of posts authorised employees can send out as part of their daily responsibilities from the official CTC Facebook/Instagram account, though discretion will be exercised by the Town Clerk under CTC's adopted Scheme of Delegation:

- Informing the community about upcoming public meetings
- Sending out updates on improvements/changes on the website
- Posting photos after successful events or before to advertise and raise profile
- Giving out relevant advice in situations such as adverse weather, highway matters or road works
- Sending out notices of unavoidable office closures
- Posting photos of improvements around the town, such as cleaned up bus shelters, repainted public areas and Christmas lights.