

CORRINGHAM PARISH COUNCIL

Electronic Communication, Press and Social Media Policy

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Scope

This policy defines the roles and responsibilities of Corringham Parish Council regarding electronic communications, social media and dealings with the Press. It is not the intention of this policy to curb freedom of speech or enforce strict rules and regulations but to provide guidance on ensuring efficient and effective communications between councillors and third parties. Councillors and Proper Officers alike are responsible for ensuring compliance with this and related policies.

A separate policy on Data Breach is available and should be considered in conjunction with this policy.

Introduction

Corringham Parish Council aims to inform the community and the wider local area about what is happening within the Parish through as many communication channels as possible to share important news and information. The Parish Council recognises that electronic communication (email), social media and press publications allow it to communicate efficiently and effectively, facilitate and encourage informed comments from interested individuals and groups and promote a community spirit. The Parish Council aims to use the most effective channel for its communications. It will update this policy to reflect any new arrangements or means of communication it may introduce.

1. Electronic Communication (email)

Electronic communication (email) is used both within the Parish Council and between the Parish Council and the people, businesses and agencies it works with and serves.

Emails received by the Parish Councillors or Proper Officer (i.e., the clerk) may be disclosed following a request under the Freedom of Information Act 2000, or following a subject access request under the Data Protection Act 1998 or during legal proceedings.

Information that is held by someone on behalf of Corringham Parish Council (that is by a Councillor or Proper Officer) will satisfy the definition in Section 3(2)(b) of the 2000 Act and constitute 'information held by a parish council' which a person is entitled to request under the 2000 Act. Therefore, information that relates to the official business of the Council that is held in personal email accounts (for example, Hotmail, Yahoo and Gmail) of Councillors or the Proper Officer is caught by the 2000 Act.

If official business of the Parish Council held in personal email accounts of councillors and the Proper Officer contains personal data, it may come within the scope of a subject access request under the 1998 Act.

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If the personal email accounts of Councillors contain personal data that relates to their activities as a Parish Councillor or campaigning for election, it may come within the scope of a subject access request to the Member under the 1998 Act.

Information in the personal emails of Councillors or the Proper Officer that does not relate to the business of the Council will not be subject to the 1998 or 2000 Act.

If inappropriate internal Parish Council emails are required to be disclosed to persons external to the Council then, at best, they may be considered embarrassing for the Council and, at worst, have other unwanted consequences. If internal emails are defamatory, offensive, or wrongly disclosed confidential information or personal data (which means information that may identify a living individual, such as name, address or telephone number) to those who should not have such confidential information or personal data, this may provide others with a means of legal redress against Corringham Parish Council.

2. Key Principles

All communications from Corringham Parish Council should meet the following criteria:

- Be civil, tasteful and relevant;
- Not contain content that is knowingly unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually-oriented or racially offensive;
- Not contain content knowingly copied from elsewhere, for which the Parish Council does not own the copyright;
- Not contain any personal information, other than necessary basic contact details;
- If official council business, it will be moderated by the clerk to the Parish Council as the Proper Officer.

When writing any communication, always assume it may have to be disclosed to a court or tribunal or the Information Commission because this could happen in some circumstances.

Keep communications relevant and concise. Do not send unnecessary copies or forward messages to others if not strictly necessary. Ensure that email trails have been removed where appropriate.

Always write emails as if they are permanent because even when deleted, they may be retrievable and may be disclosable to a court or the Information Commissioner.

Even if marked private or confidential, internal emails might eventually need to be disclosed when it is lawful to do so, e.g., under the 2000 or 1998 Acts or as part of the requirement on parties to disclose documents in the course of legal proceedings.

Information in communications may not be confidential but may be sensitive information that needs to be respected.

Always respect the privacy of others.

Do not write anything in communications that might be construed as offensive or discriminatory.

Do not make negative comments about an individual, including members of the public, Councillors, Proper Officer, or business suppliers.

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Use a Parish Council signature so that it is evident in what capacity you are writing. Copy in (either carbon copy (CC) or blind carbon copy (BCC) any appropriate officer or Councillor.

Ensure that all devices (computers, laptops, phones) are password protected and, where possible avoid holding an individual's information in a Councillor's home or on a Councillor's personal device. If information containing personal data on behalf of the Parish Council needs to be held, it must be stored securely in a locked room or cabinet, or if on an electronic device, in an encrypted folder.

Ensure that antivirus software and operating systems are up-to-date on all devices used for electronic communication.

3. Correspondence and Communication Procedures

Parish Council Correspondence and Communications with Parish Council Staff

The point of contact for the parish council is the clerk, and all correspondence for the Parish Council should be directed to the clerk. The dedicated email address is clerk@corringhampc.org

The email account is monitored and responded to, and the Parish Council aims to reply to all enquiries as soon as practically possible.

The clerk is responsible for dealing with all correspondence and emails and will forward on relevant mail to Councillors or external agencies for information and/or action. All communications on behalf of the Council will usually come from the clerk and otherwise will always be copied to the clerk.

Where correspondence from the clerk to a Councillor is copied to another person, the addressee should be made aware that a copy is being forwarded to that other person.

Councillors should acknowledge their emails when requested to do so.

SMS (texting): Councillors and the clerk may use SMS as a convenient way to communicate at times. All are reminded that this policy also applies to such messages.

From time to time, the clerk may choose to operate a filtering system to monitor offensive or inappropriate material and may quarantine any messages in that category.

No individual Councillor should be the sole custodian of any correspondence or information in the name of the Parish Council, a committee, subcommittee or working party. Councillors do not have a right to obtain confidential information/documentation unless they demonstrate a 'need to know'.

All official correspondence should be sent by the clerk in the name of the Parish Council, making clear it is written in their official capacity as clerk and has been authorised by the Parish Council.

Councillors must not give instructions to any member of staff, unless authorised to do so (for example, three or more Councillors sitting as a committee or subcommittee with appropriate delegated powers from the Council).

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No individual Councillor, regardless of whether or not they are the Chair of the Council, the Chair of a committee or other meeting, may give instructions to the clerk or to another employee which are inconsistent or conflict with council decisions or arrangements for delegated power.

Correspondence with External Parties

Councillors must not send, receive or disseminate proprietary data or any confidential information belonging to Corringham Parish Council to or from a third party unless authorised.

Councillors may be regularly approached by members of the community. Enquiries may be in person, by telephone, letter, email, or social media. When in doubt about how to respond to an enquiry, Councillors should seek the guidance of the clerk.

Emails from Councillors to external parties should be copied to the clerk.

At no time should Councillors make any promises to the public about any matter raised with them other than to say they will investigate the matter. Depending on the issue, it may be appropriate to:

- Refer the matter to the clerk to deal with it as appropriate;
- Request an item on a relevant agenda provided the clerk considers it legal;
- Investigate the matter personally, having sought the guidance of the clerk.

Councillors must ensure that all communication with the public on Council related matters reflects the decisions and policies of regardless of the Councillor's personal views on any subject.

Meetings with the clerk or other officers:- Wherever possible an appointment should be made; meetings should be relevant to the work of the officer; Councillors should be clear that the matter is legitimate council business and not driven by a personal agenda.

Details of meetings, including matters discussed or resolved, should be copied to the clerk should they not be present at the meeting.

A copy of all outgoing correspondence relating to the parish council or a Councillor's role within it, should be sent to the clerk, and it should be noted on the correspondence, e.g., "copy to the clerk", so that the recipient is aware that the clerk has been advised.

If a member of the public requests a copy of any correspondence from a Councillor, the matter should be referred to the clerk who will consider whether the correspondence is in the public domain.

If a suspected or real data breach occurs, the clerk must be informed within 48 hours. A separate policy on Data Breach is available.

Corringham Parish Council will report to the police all known incidents in which users intentionally send or receive emails containing the following:

- images of child pornography or child abuse (i.e., images where children are or appear to be under the age of 16 and are involved in sexual activities or posed to be sexually provocative)
- adult material/pornography that breaches the Obscene Publications Acts (1959 & 1964)
- criminally racist material

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4. Social Media

‘Social media’ is the term commonly given to websites and online tools which allow users to interact with each other in some way by sharing information, opinions, knowledge and interests. This interaction may be through computers, mobile phones and new generation technology such as SmartPhones, Smart Watches.

Examples of social media include:

- Social networking: e.g., Facebook
- Video sharing: e.g., YouTube
- Blogs: e.g., Instagram or Twitter
- Wikis: e.g., Wikipedia

The Parish Council’s social media channels supplement the information published on its and in its newsletter.

- The Parish Council can remind people of important events and alert followers to news.
- The Parish Council can link to interesting and useful information about the Parish and local area published by other people.
- The Parish Council can better communicate with those using mobile devices.

Councillor Use of Social Media

When using any form of social media, Corringham Parish Councillors are obliged to consider whether they are acting in a private capacity, or whether any impression might be conveyed that they are acting for and on behalf of the Parish Council.

The Council has adopted a Code of Conduct which is binding on all members and in using social in an official capacity as a councillor, the Code of Conduct applies.

Approved Corringham Parish Council Social Media

- i. Corringham Parish Council has a website (www.corryingham.parish.lincolnshire.gov.uk). It may direct those contacting the Council to its website to see required information if it is in the public domain.
- ii. Corringham Parish Council maintains a Facebook page <https://www.facebook.com/CorrPCLincs/> to promote activities and events and as a communication and broadcast tool. Comments posted on, and messages received on the Facebook page, are views of individuals and do not represent the views of the Parish Council. Request for something to be posted on the Parish Council’s Facebook page, should be directed to the Parish Clerk. Acceptable corporate Facebook content includes,
 - Marketing campaigns
 - Consultation documents
 - News feed and emergency information
 - Event listings
 - Key dates
 - Short debates & quick comments on hot topics and relevant news (discussion board)
 - Polls and information gathering
 - Useful links

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5. Social Media Moderation Policy

The Parish Council Facebook page is reactively moderated. The Council cannot accept responsibility for the content of any comment. The Council reserve the right to remove comments received on Facebook that:

- Contain abusive, obscene, indecent or offensive language, or link to obscene or offensive material
- Contain swear words or other sorts of profanity
- Are entirely removed from the topic of conversation or are not relevant to the item posted on the wall
- Contain abusive language and/or inappropriate comments directed towards an individual involved in the thread, other organisations or the page administrator
- Constitute spam or promote or advertise products, except for an event, publication, or similar item that directly relates to the subject of discussion.
- Are designed to cause a nuisance to the page administrator or other users

For serious and/or persistent breaches of the moderation policy, the Parish Council reserve the right to prevent users from posting further comments and reserves the right to take any necessary steps to protect members of the Parish community and will delete any comments referencing the Parish Council, which are deemed abusive or offensive in anyway.

If appropriate, the clerk will respond as quickly as possible to all questions received via social networking sites. All formal requests, comments, enquiries or complaints should be emailed to the clerk using the contact details on the website.

The Parish Council may monitor forums and blogs to gain indirect feedback. The Parish Council may post replies on forums or blogs to answer queries or address factual corrections, but would generally take a cautious approach before getting involved in contentious issues.

6. Dealing with the Press and Media

Key principles for dealing with the Press verbally, members and officers should be aware of the following:

- Be informed and certain of all the facts before commenting.
- Be fully aware of Parish Council Policy when making comments on behalf of the Parish Council and that comments reflect that policy.
- Only discuss items that are in the public domain.
- Be aware of Data Protection laws.
- Ensure that comments and views will not bring the Parish Council, its Councillors or its staff into disrepute and ensure that comments are neither libellous nor slanderous.
- Be calm.

A Councillor must not disclose information of a confidential nature. This includes any discussion with the Press on any matter which has been discussed under confidential items on Parish Council or Committee agendas or at any other private briefing.

A Councillor should act with integrity at all times when representing or acting on behalf of the Parish Council. Should the media wish to discuss an issue that is, or likely to be, subject to legal proceedings, then legal advice should be sought before any response is made.

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When speaking or providing written material to the Press and Media, Councillors should make clear the capacity in which they are providing the information. For example: as Chairman, as an individual (i.e., letter to press for publication).

Never use the prefix "Councillor" when writing to the Press as an individual or refer to your position on the Parish Council as this implies that Council policy is being stated. A copy of any written material sent to the Press and Media by a Councillor, as representing the Parish Council, must be forwarded to the clerk.

If the Press or media approach a Councillor for comment on a controversial subject, consideration and care is required not to be led into stating something not intended. If unsure about any particular policy, A Councillor should state "no comment" and ask the Press to contact the Parish Council.

Councillors should be aware that case law states that the role of Councillor overrides the rights to act as an individual. This means that Councillors should be careful about expressing individual views to the Press or media, whether or not they relate to matters of Parish Council business.

Councillors can talk to the media but must ensure that it is clear that the opinions given were their own and not necessarily those of the Parish Council. Councillors also have an obligation to respect Parish Council policy once made and whilst it may be legitimate for a Councillor to make clear that they disagreed with a policy and voted against it (if this took place in an open session), they should not seek to undermine a decision through the Press.

A Councillor should not raise matters relating to the conduct or capability of an Officer at meetings held in public or before the Press.

Purdah

In the six week run up to an election, whether local, general or European, councils have a duty to avoid doing or saying anything that could be viewed in any way to support any political party or candidate. The period is known as purdah.

The Parish Council will continue to publish important service announcements using social media but will monitor and potentially have to remove responses if they are overtly party political.

Meetings of Council and Committees

Facilities will be provided at meetings when requested for the Press to take notes of the proceedings.

As provided in the Parish Council's Standing Orders, both the Press and Public may be excluded from a meeting whilst certain confidential matters (as provided for in the relevant legislation) are under discussion.

Related Policies

Data Breach Policy

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