

# BRACEBRIDGE HEATH PARISH COUNCIL

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## Policy for online interaction

<b>Contents</b>	<b>Page</b>
1. Purpose	1
2. Scope	1
3. Policy statement	2
4. Definitions	2
5. Responsibilities & review	3
6. Related legislation, policies and guidance	4
7. Who can use social media?	4
8. Benefits and risks	4
9. Safety	5
10. Anonymous posts	5
11. Political bias	5
12. Data protection	6
13. Appropriate use guidelines	6
14. Breaches of policy	7
15. Acknowledgements	7
16. Version control and amendment history	7
17. Appendices	
Appendix 1 – Bracebridge Heath Parish Council website	8
Appendix 2 – Bracebridge Heath Parish Council social media accounts	9
Appendix 3 – Appropriate use guidelines	11

## **1 Purpose**

- 1.1 Bracebridge Heath Parish Council chooses to use online accounts to communicate to an audience on a range of subjects relating to its activities, providing updates, information and news. It also allows the sharing of relevant posts from other sources which have a direct relevance to residents and members of the community.
- 1.2 This policy aims to cover use of online social media. Bracebridge Heath Parish Council uses three distinct methods of online interaction:
  - Email. Direct messages are sent and received to and from individuals or groups of individuals by officers of the Parish Council. Messages may be shared with employees or Members of Council and may be archived for reference. These messages are not normally carried out within a public setting.
  - Website. This is a publicly available set of documents which is accessible by anyone. See appendix 1.
  - Social media. This is a publicly available set of documents which is accessible by anyone.
- 1.3 The Parish Council accepts that social media is a two-way process and welcomes contributions from members of the community. This can take several forms:
  - new posts by members of the community;
  - comments by members of the community in response to posts made by other members of the community;
  - comments by members of the community in response to posts made by representatives of the Parish Council;
  - comments by representatives of the Parish Council in response to posts made by members of the community;
  - comments by representatives of the Parish Council in response to posts made by other representatives of the Parish Council.
- 1.4 This policy provides a structured approach to using social media and will ensure that it is effective, lawful and does not compromise Parish Council information or computer systems/networks.

## **2 Scope**

- 2.1 This policy applies to all Members, Officers, employees and volunteers associated with Bracebridge Heath Parish Council.
- 2.2 It relates to all use of social media and networking, whether inside or outside of official capacities.
- 2.3 A definition and examples of social media can be found in section 4 (Definitions) of this policy. It should be noted that other online network groups and sites are available to members of the local community. Members and Officers of the Parish Council are free to join these groups or make use of these sites but they should be clear that they are commenting in a personal capacity and not on behalf of the Council.
- 2.4 Other forms of social media may be considered as useful to the Council. This policy and guidelines apply equally to any use of social media by Members or Officers of the Council.

2.5 All users must ensure that they use social media sensibly and responsibly, and ensure that its use will not

- adversely affect the Parish Council or its business;
- cause damage to the reputation and credibility of the Parish Council or any individual representative of the Council;
- otherwise violate any Parish Council policies.

2.6 For more detailed coverage of Bracebridge Heath social media accounts, see appendix 2.

### **3 Policy statement**

3.1 Social media can be used by the Parish Council as an effective way to engage with residents and other members of the community.

3.2 The aim of this policy is to ensure:

- engagement with individuals and communities and successful promotion of Parish Council- based services through the use of social media;
- a consistent approach is adopted and maintained in the use of social media;
- that all Parish Council information remains secure and is not compromised through the use of social media;
- that users operate within existing policies, guidelines and relevant legislation;
- that the Parish Council's reputation is upheld and improved rather than adversely affected;
- that communication by use of social media is effective, timely, appropriate and useful ensuring the Parish Council engages with a wider audience and utilises cross-promotion of other Council communication tools.

### **4 Definitions**

4.1 For the purposes of this policy, reference to elected Members/ officers/ employees/ volunteers will be made as 'representatives of the Parish Council' or 'representatives' unless specific groups are identified otherwise.

4.2 Social media may have the following characteristics:

- it can cover a wide variety of formats, including text, video, photographs and audio;
- it can allow messages to flow between many different types of device; PCs, phones and tablets;
- it can involve different levels of engagement by participants who can create, comment or just view information;
- it can speed and broaden the flow of information;
- it can provide for one-to-one, one-to-many and many-to-many communications;
- it can allow communication take place in real time, intermittently or with a limited or significant time delay.

4.3 For the purposes of this policy, the term "social media" covers platforms and applications which include but are not restricted to:

- Facebook, Twitter, Flickr, LinkedIn, Snapchat, Instagram, Youtube;

- Tumblr, Medium, WordPress, Blogger;
- Comments facilities within other websites, platforms and applications;
- Online tools, websites, platforms and applications which develop after the implementation of this policy.
- Social media is a term used for online tools, websites, networking forums and interactive media that enable users to communicate with each other by sharing information, opinions, knowledge and interests.

## **5 Responsibilities & Review**

- 5.1 Representatives of the Parish Council using social media should take responsibility for their own privacy settings within any platform or application.
- 5.2 In any biography where the Councillor is identified as a Councillor, the account must state that the views are those of the Councillor in question and may not represent the views of the Parish Council. Where possible, a Councillor should make clear who they are in the profile of any account and whether they are an authorised representative of the Parish Council, unless there are exceptional circumstances, such as a potential threat to personal security. In such instances, the Parish Clerk and media administrators should be contacted
- 5.3 Representatives of the Parish Council are personally responsible for the content which they publish on any form of social media. Publishing, or allowing to be published in the form of a comment, a statement about a person which is damaging to their reputation may be considered libel.
- 5.4 Representatives of the Parish Council must treat others with respect, avoid personal attacks and not make disrespectful, rude or offensive comments.
- 5.5 Representatives of the Parish Council must comply with equality laws contained within the Equality Act 2010 and associated legislation. They must not publish anything that might be considered prejudicial against any section of society. They should be careful that they are not seen to condone or support comments by others that might be considered prejudicial.
- 5.6 The Parish Council social interaction sites may not allow:
  - commercial advertising;
  - requests for commercial recommendations or services;
- 5.7 Councillors must at all times give due consideration on how their posts will affect the reputation of themselves, other representatives of the Parish Council and/or the Parish Council as a whole.
- 5.8 Representatives should consider the intended audience for any comment. They should question whether social media is the most appropriate forum for a post, or if contact directly to the Parish Clerk or to another representative is more relevant.
- 5.9 The Finance and Policy committee is responsible for the review of this policy on a biennial basis or in response to changes in relevant legislation.

## **6 Related legislation, policies & guidance**

6.1 This policy is not a substitute for legislation, regulations and codes of practice but defines how the Council will apply relevant legislation and use social media. Some of the legislation and codes of practices used to inform this policy are listed below:

- **Copyright, Designs and Patents Act 1988;**  
Some aspects of this legislation are relevant to this policy and Councillors including the use of images to which they do not hold the copyright. Information shared should be attributed to the source (i.e. via web link). Councillors must respect fair-use and financial disclosure laws.
- **Data Protection Act 1998;**
- **General Data Protection Regulations;**
- **the Equality Act 2010;**
- **the Local Government Act 1986;**
- **the Electoral Commission.**  
Further information can be found at [www.electoralcommission.org.uk](http://www.electoralcommission.org.uk).
- **the Parish Council's Code of Conduct for Councillors;**
- **Communication policy;**

## **7 Who can use social media?**

7.1 All representatives of the Parish Council may contribute to Parish Council social media accounts. All representatives of the Parish Council are able to set up their own social media accounts. They are responsible for all content which they generate or which they choose to forward or repost.

7.2 It is recognised that representatives of the Parish Council may wish to keep their personal life and official capacities separate. This can be achieved by setting up

- separate email addresses;
- distinct accounts or 'pages' within specific platforms or applications.

## **8 Benefits and risks**

8.1 The following potential benefits have been identified with the use of social media:

- ability to connect with some harder-to-reach groups;
- real-time updates on emerging situations (i.e. as they happen);
- heightened level of interactivity;
- low cost in comparison with traditional forms of media;
- enhanced transparency;
- building a sense of belonging in a neighbourhood;
- increased resident satisfaction levels;
- help to reduce social problems like vandalism or racism.

8.2 The following risks have been identified with the use of social media:

- much of the information within social media is shared in the public domain;
- groups or pages with single or limited interests can be set up easily to present what appears to be a level of expertise. However, there is no guarantee of truth within social media;
- information can be shared immediately. Responses which are not carefully considered may result in unintentionally inflaming a situation;
- information may be shared with other sites and spread far beyond the intended audience;
- it is possible to spend excess time viewing and responding to messages that outweigh any value in the first place.

8.3 In addition, social media can bring further potential risks:

- virus or other malware (malicious software) infection from infected sites;
- disclosure of confidential information;
- damage to the reputation of the council;
- social engineering attacks or “phishing” - the act of manipulating people into disclosing confidential material or carrying out certain actions;
- bullying or witch-hunting;
- civil or criminal action relating to breaches of legislation;
- breach of safeguarding through the use of images or personal details leading to the exploitation of vulnerable individuals.

## **9 Safety**

9.1 Councillors must be aware of their own safety when placing information on the internet and should not publish information which could give details which could leave them vulnerable. Any Councillor receiving threats, abuse or harassment via their use of social media should report it to the Parish Clerk, the social media administrators and/or the police.

## **10 Anonymous posts**

10.1 When commenting online on any matter relating to the Parish Council, representatives should not make anonymous posts nor use a pseudonym to hide their identity. They should make it clear whether or not they are representing the views of the Council. Councillors who fail to identify themselves by name will be deemed to be acting in breach of their official capacity. Such failure may itself be considered a breach of the Code of Conduct for Councillors.

## **11 Political Bias**

11.1 Political blogs cannot be linked from the Parish Council's website or social media accounts. The Parish Council may not promote the online accounts of any candidate or political party during an election period or at any other time. The Parish Council is not permitted to publish material which “in whole or part appears to affect public support for a political party” (Local Government Act 1986).

11.2 The Parish Council online accounts and websites may not allow:

- Electioneering during an election period, a period during which a casual vacancy is active or at any other time;

- Explicit or implicit support for political parties during election periods or at any other time
- 11.3 The Electoral Commission requires that candidates provide a return of expenditure on any form of advertising or campaign literature. This includes online advertising. There are additional requirements, such as imprint standards, for materials which can be downloaded from a website. Accounts may need to be closed or suspended for a defined period before local or national elections in order to comply with legislation which affects local authorities. Full guidance for candidates can be found at [www.electoralcommission.org.uk](http://www.electoralcommission.org.uk)

## **12 Data protection**

- 12.1 Councillors must not disclose information, make commitments or engage in activity on behalf of the Parish Council unless they are authorised to do so. They should not cite or reference customers, partners or suppliers without their prior written consent. They must handle any personal or sensitive information in line with the Parish Council's data protection policies.
- 12.2 Social media sites are in the public domain and it is important that Councillors ensure that they are confident of the nature of the information they publish. Comments posted online are permanently available.
- 12.3 Councillors must not publish or report on meetings which are private or internal or publish exempt committee reports or private papers.

## **13 Appropriate use guidelines**

- 13.1 It is acknowledged that there is considerable potential for using social media which can provide significant advantages. The responsible, corporate use of social media is actively encouraged. The following applies equally to all representatives of the Parish Council.
- 13.2 Appropriate use guidelines have been developed as part of this policy and can be found in appendix 3.
- 13.3 Representatives of the Parish Council are at liberty to set up accounts using any of the tools available but should ensure they are clearly identified as personal and do not in any way imply that they reflect the Parish Council's view. Representatives should present at all times a professional image and not disclose anything of a confidential nature. Comments of a derogatory or libellous nature should not be made and care should be taken to avoid prior to posting or sharing.
- 13.4 Elected Members should be aware that their position may be viewed differently to other members of the community when contributing to other social media which is clearly locally based. Although Councillors may choose to operate their own accounts, they need to continue to be mindful of their corporate responsibility as a Member of Bracebridge Heath Parish Council. The distinction between a personal view and a position as a Councillor may not be obvious to other members of the community. Comments on any form of media which may directly or indirectly criticise the actions/ views of employees, other Councillors or the Parish Council as a corporate body should be considered carefully before posting. As before, users are reminded of their individual responsibility for posts.

- 13.5 If unsure about any aspect of your use of social media, say nothing and seek clarification from the Parish Clerk.

## 14 Breaches of policy

- 14.1 Failure to comply with this policy may result in:
- a formal complaint being made to the Monitoring Officer under the Parish Council's Code of Conduct;
  - disciplinary action in line with the Parish Council's disciplinary policy.
- 14.2 Other violations of this policy, such as breaching the Data Protection Act 1988, could lead to criminal or civil action being taken against the individual(s) involved.
- 14.3 Bracebridge Heath Parish Council reserves the right to request the closure of any applications or removal of any content published by representatives deemed inappropriate, which may adversely affect the reputation of the Council, or put the Parish Council or an individual representative at risk of legal action.
- 14.4 The Parish Council reserves the right to remove the access to contribute to Parish Council online content from any user who breaches the terms of this policy.

## 15 Acknowledgements

The following sources are acknowledged in the creation of this policy:

- Anglesey Parish Council *social media Policy for Councillors* (adopted 13th August 2015)
- Newcastle City Council *Guidance on use of social media by elected members* (January 2016)
- Keighley Town Council *social media Policy For Councillors* (adopted 28 April 2016)
- Mablethorpe and Sutton Town Council *social media Policy 2016-2017*
- East Staffordshire Borough Council *social media Policy for Councillors* (19th May 2017)

## 16 Version control and amendment history

Date approved	Version Number	Revision / amendments made	Review date
06/03/2018	1.0	New policy	06/03/2019
02/10/2018	1.1	Changes to appendix 2, review arrangements	September 2020
10/12/2020	1.2	References to committee names updated	December 2022



## **17 Appendices**

### **Appendix 1- Bracebridge Heath Parish Council Website**

The role of the Parish Council website is to provide information about the Parish Council and the activities of other organisations around the village. It operates as a library of Council agendas, minutes and policies for the benefit of all users.

Maintenance and updating of the Parish Council website is the responsibility of the Parish Clerk.

The Parish Council website does not include any commenting facility and as such is not a forum for ongoing discussion.

The Parish Council website is used to provide a central record of information about the Parish Council. It will offer:

- agenda and dates of forthcoming meetings;
- minutes of meetings of Council and committees;
- contact information;
- information about village organisations and services;
- links to North Kesteven District Council and Lincolnshire County Council
- links to other sources of information of interest to the village community.

Links on the website that are no longer up to date should be removed or archived.

## **Appendix 2 Bracebridge Heath Parish Council social media accounts**

- 1) The Parish Council may choose to operate accounts, pages or groups within any social media platform. It should be noted that any social media account is operated as a service to residents and members of the community and is not a statutory requirement.
- 2) The Parish Council reserves the right to open or close any account, page or group within any social media platform without notice. Administration of Parish Council social media pages or groups shall be at the discretion of members and officers of the Parish Council, committees or sub-committees.
- 3) Definitions within this appendix:
  - i. Facebook group- an online forum for small group communication. Settings can be changed to make the group visible to all or closed. Individual members may change their personal privacy settings but comments that they make may not be visible to all members of a group.
  - ii. Facebook page- a public online presence for an organisation. Pages are visible to all by default.
  - iii. Representative- as given in 4.1 of this policy.
  - iv. Responsible body - may include Full Council, committee or sub-committee of Parish Council.
  - v. Administrator- an individual responsible for the monitoring and management of an online group.

For more information about the differences between Facebook pages and groups, see <https://www.facebook.com/notes/facebook/facebook-tips-whats-the-difference-between-a-facebook-page-and-group/324706977130/>

- 4) Each use of the terms 'Facebook', 'Facebook group' or 'group' within this appendix should be taken to include all Facebook groups and pages operated by Bracebridge Heath Parish Council.
- 5) The Parish Council maintains Facebook groups to communicate with members of the community. The Parish Council has adopted Facebook as an official method of communication. Membership of a group is open to all with an interest in the parish. All representatives of the Parish Council may choose freely whether to join and contribute to each group.

### **Conditions of use**

- 6) Certain conditions need to be considered by all members of each group:
  - i. posts must be of direct interest to Bracebridge Heath residents;
  - ii. comments are intended to develop communications with members of the village;
  - iii. all groups will be set as 'public' and visible to all;
  - iv. comments made must be accessible to all who wish to see them, whether members of a group or otherwise;
- 7) The following types of posts and comments are not allowed by the Parish Council on any group;
  - i. advertising for commercial events or services;
  - ii. requests for commercial or service 'recommendations';
  - iii. electioneering;
  - iv. personal comments;
  - v. defamatory or obscene posts.

- 8) Comments which fail to observe the requirements of these guidelines above will be removed without notice.
- 9) Further conditions need to be observed rigorously by all representatives of Bracebridge Heath Parish Council:
  - i. posts by representatives must reflect the status of the Council;
  - ii. at all times consideration should be given as to how any post or series of posts may affect the reputation of any individual representative or the Parish Council;
  - iii. Councillors are elected and as such are responsible to the Code of Conduct adopted by Bracebridge Heath Parish Council.
- 10) Any member of a group is able to post a comment and to respond to the comments of others.
- 11) Any member of a group is able to remove their own post without notice or further comment.

### **Administration**

- 12) Delegation of the administration and monitoring of each group lies with a responsible body.
- 13) Administration of groups shall be renewed annually in May in line with other Parish Council appointments.
- 14) Groups may be administered by volunteers on behalf of Parish Council with the permission of a responsible body.
- 15) Decisions regarding the following issues may be made by any one or more of the administrators of the relevant group:
  - i. acceptance of new members;
  - ii. acceptance or removal of posts or individual comments;
  - iii. removal of the opportunity to make further comments on any individual post;
  - iv. compilation of a 'digest' of posts for reference and archiving;
  - v. delivery of 'administration' posts reinforcing conduct within a group;
  - vi. removal of any individual member of a group.
- 16) Administrators are advised that an archived note of any removed comment and reason for removal is encouraged. However, it is accepted that this is not always possible. There is no requirement to share these notes or reasons with other representatives, members of the group or anyone else.
- 17) In the event of any administrator of a group ceasing to be a representative of a responsible body, they shall be deemed to have resigned as an administrator of the group. They may choose to remain a member of the group.
- 18) A vacant position as administrator of any Bracebridge Heath Parish Council group shall be filled by decision of the responsible body.

### **Complaints**

- 19) Queries or challenges regarding the administration of any Bracebridge Heath Parish Council Facebook group should be addressed for attention in the following order:
  - i. to the administrators of that group;
  - ii. to the responsible body;
  - iii. to the Parish Clerk for full Council.
- 20) If appropriate, complaints may be made in accordance with the Parish Council Complaints Policy.

### **Appendix 3 – Appropriate use guidelines**

The following guidelines will apply to all online participation and set out the standards of behaviour expected as a representative of Bracebridge Heath Parish Council:

- 1 know your obligations: be aware of and recognise your responsibilities identified in this policy;
- 2 comply with other Parish Council policies when using social media;
- 3 remember that you are personally responsible for the content you publish on any form of social media;
- 4 never give out personal details of others such as home address and telephone numbers;
- 5 ensure that you handle any personal or sensitive information in line with the data protection act;
- 6 when using social media for personal purposes, do not imply you are speaking for or on behalf of the Parish Council;
- 7 do not use the Parish Council e-mail address, logos or any other Parish Council identification for personal use;
- 8 make it clear that what you say is representative of your personal views only;
- 9 show respect to all;
- 10 be respectful of Parish Council elected members, contractors and employees;
- 11 social media must not be used for actions that would put councillors in breach of the code of conduct;
- 12 derogatory comments are always wrong; do not use language which would not be acceptable in any situation;
- 13 allow disagreement;
- 14 think before you publish; words cannot be unspoken and a hastily constructed post may be quickly read and duplicated many times;
- 15 if you include photographs or other images, you need to consider whether anyone shown in the photographs or images or who encounters the images might reasonably object;
- 16 particular care should be taken when photographs include young people or vulnerable adults; appropriate steps to ensure safeguarding including obtaining permission from parents or carers must be obtained;
- 17 do not use the Parish Council's online accounts to promote personal financial interests, commercial ventures or personal campaigns, whether or not related to the function of the council;
- 18 show consideration for the privacy of others and for topics that may be considered controversial.