



Lewes
Town
Council

Communications Policy

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| Policy Maker | Communications Officer |
| Responsibility | Communications and Engagement Committee |
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1. Introduction

Our Communications Policy details the general principles which underpin Lewes Town Council's communications, both internal and external. It should be read in conjunction with the Communications Strategy which details the day to day communications work.

1.1. Policy context

1.1.1 This policy is advised by the [2011 Code of Recommended Practice on Local Authority Publicity](#) ('the Code') as issued by the Department for Levelling Up, Housing and Communities (formerly the Department for Communities and Local Government). The code is statutory guidance and therefore councils must have regard to it and follow its provisions. Key requirements of the Code include that publicity by local authorities should:

- be lawful
- be cost effective
- be objective
- be even-handed
- be appropriate
- have regard to equality and diversity
- be issued with care during periods of heightened sensitivity

This Communications Policy also takes into account national guidance for town councils, for example '[The Good Councillor's Guide](#)' (National Association of Local Councils).

1.1.2 Lewes Town Council's Communications Policy and the Communications Strategy govern the relations with the press and media as referred to in *Standing order xx*.

1.1.3 Failure to follow the council's Communications Policy could lead to a breach of the statutory code and the risk of adverse publicity, which could damage the council's reputation. It is important that all councillors and officers understand the implications of this code which this policy explains within a local context.

1.1.4 This policy is effective from *5 June 2024* and replaces the 'Communications Policy @ March 2019'. It will be reviewed *annually*.

1.2. Policy statement

1.2.1 This policy is intended to help councillors and officers make appropriate decisions about communications around their roles, such as (but not limited to):

- comments to the media
- social media posts
- emails (both internal and external)
- blogs
- social media
- radio
- podcasts
- forums
- message boards
- comments on web articles

1.2.2 This policy outlines the standards Lewes Town Council requires councillors to observe, the circumstances in which the council will monitor councillor communications, and the action to be taken in respect of breaches of this policy.

1.3. Who is covered by this policy?

1.3.1 This policy covers all individuals working at all levels with Lewes Town Council, including all elected and co-opted councillors, volunteers, staff and contractors.

1.3.2 This policy supplements all other policies and procedures adopted by the council.

1.3.3 The Town Clerk and all other employees must also comply with employment policies, many of which also refer to communications.

1.4. The scope of this policy

1.4.1 The council is responsible for the effective operation of this policy. All members must comply with this policy to protect the reputation, privacy, confidentiality, and interests of Lewes Town Council, its services, employees, partners and community.

1.4.2 This policy does not form part of any contract of employment and it may be amended at any time.

1.4.3 Behaviour required by the members' [Code of Conduct](#) shall apply to online activity in the same way it does to other written or verbal communication.

1.4.4. All members should ensure that they take the time to read and understand this policy. Any breach or questions should be reported to the Town Clerk or Communications Officer.

2. External communications

2.1 Definitions

External communications includes, but is not limited to: media coverage, press releases, letters, articles, social media posts, publicity, broadcasts.

2.2 Guiding principles

2.2.1 Per standing order 22, the Town Clerk has overall responsibility for all communications from Lewes Town Council. Responsibility for communications can be delegated to the Deputy Town Clerk and the Communications Officer, or other officers for specific tasks.

2.2.2 Councillors do not have the right to communicate on behalf of Lewes Town Council without authorisation.

2.2.3 Unless a councillor is **absolutely certain** that they are reporting the view of the council, they must make it clear to members of the public that they are expressing a personal view. Where a councillor is authorised to speak on behalf of the council, it is their responsibility to ensure they are clear on the corporate position of the council, and that their responses to questions accurately reflect this.

2.3 Press

2.3.1 The Town Clerk will discuss press reports, or comments to the media, with appropriate councillors or the Chair of Council or the relevant committee.

2.3.2 Press reports from the council, its committees or working parties should come from the Town Clerk or delegated officer, or via a reporter's own attendance at a meeting.

2.3.3 Unless a councillor has been specifically authorised by the council to speak to the media on a particular issue, councillors who are asked for comment by the press should make it clear that it is a personal view and ask that it be clearly reported as their personal view, and direct questions on behalf of the council to the Town Clerk and/or Communications Officer.

2.3.4 Where an officer is authorised to speak on behalf of the council, they must never give their opinion on specific council policy and must remember their role is to provide expertise and factual knowledge in support of the council's agreed policies.

2.3.5 Care should always be taken not to make statements which might be inaccurate or defamatory. The same care should be exercised before publishing statements made by others, eg. by reading out letters from constituents at council meetings or reproducing complaints verbatim in the minutes of a meeting or sharing content by third parties via council channels.

2.4 Use of the lewes-tc.gov.uk website

2.4.1 The Town Clerk will delegate responsibility to the Communications Officer, to maintain and update the council website. The website may be used to:

- Post notices and minutes of meetings
- Publish data according to the The Local Government Transparency Code 2015
- Advertise events and activities
- Post good news stories
- Link to appropriate websites or press page if those sites meet the Council's expectations of conduct provided that their terms and conditions of that website permit it
- Advertise vacancies

- Share information from partners i. e. police, library, district or county council, etc if permitted to do so.
- Announce new information appropriate to the council.
- Post or share information promoting bodies for community benefit such as schools, Scouts, sports clubs and community groups
- Post other items as the council see fit.
- Social media may be used to support the website and its information as above.

2.4.2 The website may not be used to publish material of a deliberately contentious, offensive or disputatious nature, or material that criticises or implies criticism of one or more members of the public, individual councillors, groups of councillors or the council as a whole. Regardless of what has been voted on by council, the website shall not contain any material that is libelous or defamatory or in any way against the law or which could expose the council to legal challenge.

2.5 Social media

2.5.1 Councillors must follow the below rules and not allow their interaction on any websites, blogs, forums or other social media platforms to damage their working relationships with others.

- Do not make any derogatory, discriminatory, defamatory, abusive, obscene or offensive comments.
- Be responsible and respectful; be direct, informative, brief and transparent.
- Always disclose their identity and affiliation to the council.
- Never make false or misleading statements.
- Not present themselves in a way that might cause embarrassment. They must protect the good reputation of the council.
- Be mindful of the information posted on social media sites, and make sure personal opinions are not published as being that of the council.
- Keep the tone of comments respectful and informative, never condescending or rude. Use sentence case format, not capital letters, do not write in red to emphasise points.
- Refrain from posting controversial or potentially inflammatory remarks. Language that may be deemed as offensive relating in particular to race, sexuality, disability, gender, age or religion or belief should not be published on any social media site.
- Avoid personal attacks, online fights and hostile communications.
- Never disclose commercially sensitive, personal, private or confidential information.
- Never publish anyone else's contact details.
- Do not post comments that you would not be prepared to make in writing or face to face.
- Never name an individual third party unless you have written permission to do so.
- Seek permission to publish original photographs or videos from the persons or organisations in the video or photograph before they are uploaded. You must check that there is parental permission before photos of children are used.
- Respect the privacy of other councillors, staff and residents.
- Never post any information or conduct any online activity that may violate laws or regulations, such as libel and copyright.
- Spell and grammar check everything.

2.5.2 If councillors post on social media personally, and not in their role as a councillor, they must not act, claim to act, or give the impression that they are acting as a representative of the council.

2.5.3 The Town Clerk is the designated owner of all social media accounts in Lewes Town Council's name.

- Where a social media account has been set up by another officer, full access will be provided to the Town Clerk.
- Ownership will be transferred where and when deemed necessary by the Town Clerk.
- The opening of any new social media channel in Lewes Town Council's name should be approved by the Town Clerk.
- All social media sites in use should be checked on a regular basis to ensure the security settings are in place.
- The Town Clerk will designate a site administrator who will be responsible for regular monitoring and maintenance of any content on official Lewes Town Council social media channels.

2.5.4 The Communications Officer will be the nominated person to act as moderator. They will be responsible for monitoring of the content on council pages, ensuring it complies with this policy. They may delegate monitoring responsibilities to other officers, but it must be clear when the channels are being monitored.

2.6 Media and social media monitoring

2.6.1 The Communications Officer will monitor media coverage.

2.6.2 Lewes Town Council reserves the right to restrict or remove any content on Lewes Town Council social media platform that is deemed in violation of this policy or any applicable law.

Users will be informed that their posts may not be published/or may be hidden or deleted if they meet any of the criteria below:

- Comments not topical to the article being discussed
- Comments that are politically motivated
- Profane language
- Material that perpetuates or promotes discrimination of protected characteristics as listed in the Equality Act 2010, including, age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.
- Solicitation of commerce ie, trying to sell items or encourage the sale of products or services not related to the council.
- Illegal conduct or encouragement/support of illegal activities
- Information that compromises or may compromise the safety or security of the public or public systems
- Content that violates the legal ownership interest of any other party

The Town Clerk can instruct officers to immediately, without notice or comment, remove or hide any posts from the council's social media pages if they are deemed inflammatory. Such posts may also be reported to the hosts and the Monitoring Officer for their records. Posts to Lewes Town Council official channels that do not observe these standards may be retained or acknowledged when it would be beneficial to transparency.

2.6.2 Councillors and staff are at liberty to use their own social media accounts on any platform they choose, but these must be identified as personal and make it clear that they do not represent the council. These accounts are the responsibility of the account holder and must comply with this policy and the [electoral commission's guidance on digital imprints](#).

2.6.3 Councillors and staff members should be aware that any use of social media websites (whether or not accessed for council purposes) may be monitored and, where breaches of this policy are found, action may be taken. Councillors and staff should at all times present a professional image and not disclose anything of a confidential nature.

2.6.4 Residents and councillors should be aware that not all communication through social media requires a response, although an acknowledgement should be made if appropriate. Reports of any concerns regarding content placed on social media sites should be sent to the Town Clerk.

2.6.5 Pursuant to Article 6(3) of the Local Authorities (Indemnities for Members and Officers) Order 2004 (SI.3082), a council is able to provide indemnity to members and officers in order to allow them to defend a defamation action. An indemnity cannot be provided for the bringing of such an action by a member or officer.

2.7 Publicity during elections

2.7.1 There are specific rules governing publicity when an election has been announced. In the period between the notice of an election and the election itself (sometimes known as purdah), all proactive publicity about candidates is halted. The pre-election restrictions are governed by Section 2 of the Local Government Act 1986, as amended in 1988. Essentially councils should 'must be sensitive to any publicity that could potentially influence the outcome of an election'. Section 4 of the Act makes clear that councils need to have regard to the Code of Recommended Practice.

2.7.2 During the pre-election period, all council publicity shall be managed by the Town Clerk (or other nominated officer), and any quotes provided in support of press releases will be given by authorised officers.

2.7.3 It is important to note that pre-election rules restrict activity wider than just publicity. Use of council facilities and resources; the member's code of conduct, developing new policies and holding of events (including some meetings) featuring elected officials should all be carefully considered during a period of heightened sensitivity.

2.7.4 . Lewes Town Council will follow the rules [published by the Local Government Association](#) unless there are specific variations applying to Lewes from Lewes District Council or East Sussex County Council.

3. Internal Communications

3.1 Definitions

Internal communications covers the procedures, day to day service operations and statutory meeting arrangements of the council as well as how information is shared within the organisation, in order to achieve the organisation's goals. Further guidance for staff is available in staff contracts.

3.1.1 Lewes Town Council aims to be a paperless operation. Email and Microsoft Teams (virtual meeting and messaging software) are used primarily for the day to day running of the council.

3.1.2 Decisions are made at council and committee meetings.

3.1.3 Staff meetings and one to one sessions enable staff to share information and give feedback. Councillors may be invited to attend where appropriate.

3.2 Meeting agendas for council and committees

3.2.1 Agendas should be clear and concise. They should contain sufficient information to enable councillors to make an informed decision, and for councillors and the public to understand what matters are being considered and what decisions are to be taken at a meeting.

3.2.2 Items for information should be kept to a minimum on an agenda.

3.2.3 Councillors should fill in a business case form before requesting the council undertake a project, motion, activity or event.

3.2.4 In accordance with Standing Order 15 agendas will be published five clear days before a meeting and put in a conspicuous place eg the noticeboard, and on the website, per legal requirements.

3.2.5 In accordance with Standing Order 11 neither the Town Clerk, nor councillors, will disclose confidential information that is exempt under the Freedom of Information Act. The agenda and its supporting papers, and the minutes from a meeting where confidential or

sensitive information is discussed, shall not disclose or otherwise undermine such information which, for special reasons, is not in the public interest.

3.3 Communications with Lewes Town Council staff

3.3.1 Information to councillors should normally be directed via the Town Clerk or a delegated officer.

3.3.2 Councillors must not give instructions to any member of staff, unless specifically authorised to do so (for example, three or more councillors sitting as a committee or working party with appropriate and specific delegated authority from the council).

3.3.3 Members who wish to investigate or promote any issue should first use a business case form and discuss the matter with the Town Clerk, so that preliminary consideration can be given to the legal, financial, technical and staffing implications and to the possible impact and relationship to existing projects or policies in which the council is currently involved.

3.3.4 Emails from councillors should not expect instant replies and reasons for urgency should be stated. Respect to staff's limited hours should be given and as much notice should be given as possible when making requests.

3.3.5 Councillors should acknowledge their emails when requested to do so and reply to meeting requests. Emails to external parties regarding council business should be copied to the Town Clerk and any other officers working on a project.

3.3.6 Wherever possible appointments should be made for meetings with the Town Clerk or other officers, meetings should be relevant to the work of that particular officer. Councillors should be clear that the matter is legitimate council business and not matters driven by personal or political agendas.

3.4 Email and other correspondence

3.4.1 The point of contact for the town council is the Town Clerk, and it is to the Town Clerk that all correspondence for the town council should be addressed.

3.4.2 All official correspondence should be sent by the Town Clerk in the name of the council using council letter headed paper or email.

3.4.3 Contact received by the info@lewes-tc.gov.uk email address or via the 'Contact Us' part of the lewes-tc.gov.uk website will be forwarded to the appropriate member of staff or body.

3.4.4 Most communications with members will be via the official email channels. Where there is an immediate need to speak to someone, from officer to member or member to officer, a phone call may be more appropriate. A brief note should be made by the officer concerned, recording the date and the purpose of the call.

3.4.5 The council will use members' lewes-tc.gov.uk email address for all official mail. GDPR rules will be observed concerning storage of members' personal contact details for any other matters.

3.4.6 Members will use their lewes-tc.gov.uk address for all official matters, including casework and an agreed email signature will be used.

3.4.7 Email requests from members will not be counted as instructions.

3.4.8 Councillors are required to use their council email for council business and not personal email addresses. Likewise, they are required to not use their council email for personal communications, especially speaking to the media.

3.4.9 If councillors receives a comment or complaint from a member of the public, this should be dealt with in accordance with the council's adopted code of practice for handling complaints.

3.4.10 Except where the council has asked the Chair to send a letter, the Town Clerk is responsible for sending all correspondence from the Town Council to other bodies. Correspondence is generally requested or authorised by the Town Council. The Town Clerk will send correspondence on operational or other matters, by delegated authority as the Proper Officer, as described in standing order 15.

3.4.11 Individual members should not communicate with another body, statutory, voluntary or commercial organisation, other than in a personal or ward councillor capacity, unless otherwise agreed.

3.4.12 As the Town Clerk should be sending most of the council's correspondence from the council to other bodies, it needs to be made clear that communications sent from individual members is written in their official capacity and has been authorised by the council.

3.4.13 A copy of all outgoing correspondence relating to the council or a councillor's role within it, should be sent to the Town Clerk (usually in cc of an email), and it be noted on the correspondence, so that the recipient is aware that the Town Clerk has been advised.

4. Accessibility

4.1 Lewes Town Council are keen to assist people who need extra support to read or understand communications from the council, or who need help to communicate with the council.

4.2 Hard copies or large print copies for people with impaired vision, or translations of publications into different languages can be provided on request.

4.3 In accordance with Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, where possible, the lewes-tc.gov.uk website and all documents published on it will be written and designed in a way to be accessible by a screen reader.

4.4 The council will continuously implement improvements to its communications work through renewal and enhanced use of its website, social media and digital approaches to sharing information alongside making hard copies available where required. Transparency will be maintained at all times.

5. Transparency

5.1 The council will comply with the Local Government Transparency Code.

5.2 In compliance with Standing Orders 20 and 21 requests for information held by the council shall be handled in respect of handling requests under the Freedom of Information Act 2000 and the Data Protection Act 1998. Correspondence from, and notices served by, the Information Commissioner shall be referred by the Town Clerk to the council.

5.3 The council has the power to do anything to facilitate compliance with the Freedom of Information Act 2000.

5.4 Council information will be made available to members of the public in accordance with the council's adopted Publication Scheme.