

# MARLBOROUGH TOWN COUNCIL

## Electronic Communications and Social Media Policy



### 1. Introduction

Marlborough Town Council uses online tools to provide and communicate information easily, clearly, effectively, appropriately and in a timely manner to the people, businesses and agencies it works with and serves.

The Council has a website, social media (Facebook, Twitter and Instagram) accounts, YouTube channels and uses email to communicate. For a full list see section 6.

The Council will always try to use the most effective channel for its communications and over time may add to the channels of communication that it uses as it seeks to improve and expand the services it delivers. When these change this Policy will be updated to reflect the new arrangements.

The Council's website and social media accounts intend to provide information and updates regarding Council meetings, news, services, events, and activities within our Parish as well as information for tourists, and to promote our town positively. None are intended to be used as discussion fora as this would exclude people who don't use the internet or social media. Ways to hold discussions with Councillors and/or the Town Council remain in person at the 5 High Street office, by phone, email (to the office or Councillors) or Public Question Time at any Council or Committee meeting.

It is important to ensure that the Council balances the opportunities presented by social media platforms with its duties to service users and partners, its legal responsibilities, and its reputation. For example, the Council must be mindful of its duty to safeguard children, young people and vulnerable adults.

### 2. Purpose

This policy aims to provide a framework of good practice to ensure that:

- 2.1. Councillors, staff and members of the public know what to expect from Council online platforms and how to communicate online with Marlborough Town Council.
- 2.2. The Council is not exposed to security, legal or governance risks.
- 2.3. The reputation of the Council is not adversely affected.
- 2.4. People can clearly distinguish where information provided via social media is legitimately representative of the Council.
- 2.5. Councillors and staff (as described in 3.1) are clear about their roles and responsibilities.

### 3. Scope

- 3.1. This policy covers the use of e-mail, websites, social media, and networking applications by staff, Councillors, partners or other third parties (including contractors and volunteers) when they are acting on behalf of the Council. It does not cover staff or Councillors when they are using personal e-mail or personal social media sites.
- 3.2. Where individuals, including those from partner organisations or volunteers, are involved and are acting on behalf of the Council, they will also be expected to comply with relevant Council policies.

- 3.3. This policy covers online and social networking applications including, but not limited to, blogs (for example, WordPress), online discussion forums, collaborative spaces, media sharing services (for example, YouTube), videoconferencing (for example, Zoom) social networking and other online applications (for example, Twitter, Facebook, Instagram, TikTok, WhatsApp groups).
- 3.4. This policy applies to all uses of electronic communications used for any Council-related purpose and regardless of whether they are hosted corporately or not and must be considered where people are contributing online in an official capacity to sites provided by external organisations.
- 3.4. Councillors and staff should bear in mind that information they share online, even if they are on private spaces, are still subject to copyright, data protection and Freedom of Information legislation, the Safeguarding Vulnerable Groups Act 2006, Equal Opportunities and other legislation.
- 3.5. Use of social networking applications by staff in work time and/or for personal use only is not addressed by this policy.

#### 4. Terms of Use of Online Media

Councillors and staff must adhere to these Terms of Use. These apply to all uses of social networking applications including, but not limited to, public-facing applications such as open discussion forums and internally facing uses such as email or social media regardless of whether they are hosted on corporate networks or not.

Comments made on social media platforms sometimes lack transparency or clear audit trails: for example, a @username may be an alias with no contact information provided such as an email address. In addition, users tend to 'share' and comment on posts across multiple sites and profiles. This means it is not always possible to see all comments relating to a topic or post (for example, if someone has shared and commented on a private profile).

For these reasons the Town Council will never use social media to enter debates, discussions to answer questions raised by the public other than to answer simple service-related questions (for example, "*How do I apply for an allotment?*"). Proper routes to raise questions with Council include Public Question Time at any Council meeting or via the Town Council office (in writing, by email or by telephone), or by contacting a Councillor. Contact details for Officers and Councillors are published on the Town Council's website.

Official Council profiles and pages will be managed by staff on behalf of the Town Clerk and will only be used to share information or promote events or tourism. They will not be used to enter into discussions, debates or answer questions other than simple service questions.

Where individuals, including those from partner organisations or volunteers, are involved and are acting on behalf of the Council, they will also be expected to comply with relevant Council policies.

All Terms of Use apply to all types of online communication irrespective of platform.

- 4.1. All proposals for using online communications as part of a Council service (whether they are hosted by the Council or by a third party) must be approved by the Town Clerk first.
- 4.2. Use of online applications which are not related to any Council services (for example, contributing to an online forum provided by a professional association) do not need to be approved by the Town Clerk. However, Councillors and staff must still operate in line with

the requirements set out below.

- 4.3. Where applications allow the posting of messages online, users must be mindful that the right to freedom of expression attaches only to lawful conduct. The Council expects that users of social networking applications will always exercise the right of freedom of expression with due consideration for the rights of others and strictly in accordance with these Terms of Use.
- 4.4. Posts must not contain content that is knowingly unlawful, libellous, harassing, defamatory, abusive, hateful, threatening, harmful, obscene, profane, sexually oriented or racially offensive.
- 4.5. Posts must not be used for actions that would put Councillors or staff in breach of Council codes of conduct or policies relating to Elected Members or staff.
- 4.6. Council profiles, pages or email accounts must not be used for party political purposes or specific campaigning purposes as the Council is not permitted to publish material which 'in whole or part appears to affect public support for a political party' (LGA 1986).
- 4.7. All users (Councillors, staff and public) need to be aware that applications may be closed, or commenting suspended, for a defined period before local or national elections in order to comply with legislation which affects local authorities.
- 4.8. Council profiles, pages or posts must not be used for the promotion of personal financial interests or personal campaigns.
- 4.9. Council profiles, pages or posts must not be used for the promotion of commercial ventures.
- 4.10. Any contributions made by Councillors or staff should be professional and uphold the reputation of the Council.
- 4.11. Councillors and staff should avoid posting to, or commenting on, Marlborough Town Council social media sites as their comments may be perceived to reflect the views of the whole Council and/or could lead to debate in the public domain<sup>1</sup>, and/or leave the Council exposed to reputational risk. They can however do this if they have cleared the content in advance with the Town Clerk or his or her delegated officer, for example, the Mayor or Chair of a Committee may be asked to comment on a matter of public interest. Comments should always represent a corporate or consensus view. Any comments deemed to be in violation of this will be hidden and/or removed (see section 7 'Enforcement').
- 4.12. Members may interact with Town Council social media channels simply to show support, for example to 'like' a post, or to share stories to other platforms with neutral comments, or to add neutral or benign comments to a post, for example to say "well done" against a good news story.
- 4.13. Councillors and staff should think very carefully before posting to other social media platforms with wide readership, for example the Facebook page called Marlborough Notice Board. If they do so they should make it clear in their statement that their comment reflects their own personal views and is not representative of Marlborough Town Council unless this has already been cleared by the Town Clerk, or is signposting to information already

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<sup>1</sup> Please see the introduction, para. 4 for an explanation about the ways Town Council social media sites will and will not be used

published on the Marlborough Town Council website or other channel.

- 4.14. Councillors, if using their own personal social media account profiles, should be aware that anything they say *could* be construed by others as being 'official' Town Council comments even if not intended that way. If there is any doubt, please add clarification such as "...my own personal view".

## 5. Transparency

It is important to ensure that members of the public and other users of online services know when an email account, website or social networking application is being used for official Council purposes. To assist with this, all Councillors and staff must adhere to the following requirements:

- 5.1. Councillors and staff must use their @marlborough-tc.gov.uk email account, and not their personal account, for all correspondence when they are communicating as a Councillor or staff member.
- 5.2. Councillors and staff should clearly identify themselves when using @marlborough-tc.gov.uk email accounts (for example, by providing additional information in their email signature with "*Councillor myname, Marlborough Town Councillor*" or "*Richard Spencer Williams PSLCC, Town Clerk*") and similarly when speaking on behalf of the Council on social media/videoconferencing platforms etc.
- 5.3. The use of the Council's logo or other branding elements should be used where appropriate to indicate the Council's support. The logo should not be used on social networking applications which are unrelated to, or are not representative of, the Council's official position.
- 5.4. Official complaints procedures must be published in a prominent place which is easily accessible to others.

## 6. List of Applications

Marlborough Town Council has a range of online tools that will be used to convey and share information to the public, to tourists or for press announcements.

- 6.1. Email – all official accounts will only use the @marlborough-tc.gov.uk domain. Officers and Elected Members have email addresses which are listed on the Town Council Website. In addition, there is a general enquires address: [enquiries@marlborough-tc.gov.uk](mailto:enquiries@marlborough-tc.gov.uk) .
- 6.2. Website - <https://marlborough-tc.gov.uk/>  
The Town Council's website is the 'landing page' or hub for all council-related information. It provides information about services, useful links for the community and tourist information. It is a repository for information, for example agendas and minutes of meetings; venue hire prices; contact information and from time to time may be used to host public consultations or other relevant items of business.
- 6.3. Facebook @MarlboroughTC is the main Marlborough Town Council Facebook page. From time to time subpages will be created, for example @marlboroughdarkskiesfest to promote the 2021 Dark Skies Festival and used in partnership with the North Wessex Downs AONB, and @MarlboroughinBloom to showcase the town's entry into RHS South West in Bloom.
- 6.4. Twitter : @MTCWilts
- 6.5. Instagram : @VisitMarlborough; used exclusively as a tourist information page

- 6.6. YouTube : Marlborough Town Council is the main channel, with sub channels for Marlborough Dark Skies Fest and Visit Marlborough UK tourist information.
- 6.7. Sending a message/post to us via social media will not be considered as contacting the Council for official purposes and we will not be obliged to monitor or respond to requests for information through these channels. Instead, please make direct contact with the Town Clerk or via the general enquiries email address and/or any Members by emailing or writing to us.
- 6.8. We retain the right to remove comments or content that includes:
- Obscene or racist content
  - Personal attacks, insults, or threatening language
  - Potentially libellous statements
  - Plagiarised material, any material in violation of any laws, including copyright
  - Private, personal information published without consent
  - Commercial promotions or spam
  - Alleges a breach of a policy or the law
- 6.9. The Council's response to any communication received not meeting the above criteria will be to either ignore, inform the sender of our policy or send a brief response as appropriate. This will be at the Council's discretion based on the message received, given our limited available resources. Any information posted on our Social Media pages not in line with the above criteria will be removed as quickly as practically possible. Repeat offenders will be blocked from pages. The Council may post a statement that '*A post breaching the Council's Social Media Policy has been removed*'. If the post alleges a breach of a Council policy or the law, the person who posted it will be asked to submit a formal complaint to the Council or report the matter to the police as soon as possible.
- 6.10. SMS (*texting*). Councillors and staff are reminded that this policy may also apply to text messages.
- 6.11. Video Conferencing, e.g. Teams, Skype, Zoom. Councillors and staff are reminded that this policy also applies to the use of Video Conferencing.

## 7. Enforcement

- 7.1. In accordance with the published complaints procedure<sup>2</sup>, any breach of the terms set out in this policy could result in the application or offending content being removed, and/or the publishing rights of the users being suspended.
- 7.2. The Town Clerk reserves the right to require the closure of any applications and/or removal of content published by Councillors or staff which may adversely affect the reputation of the Council or put it at risk of legal actions.
- 7.3. Any communications or content published that causes damage to the Council, any of its employees or any third party's reputation may amount to misconduct or gross misconduct to which the Council's Disciplinary Policy applies.

## 8. Complaints

Complaints should be made in line with the Town Council's Complaints Procedure which is available from the Town Council website.

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<sup>2</sup> Available at <https://www.marlborough-tc.gov.uk/council/corporate>

## 9. Review

This policy will be reviewed on an annual basis or sooner if any areas require improvement.

Policy adopted: 3 October 2022

## 10. General Data Protection

This policy should be read in conjunction with the Town Council's policies relating to data protection which are available at <https://www.marlborough-tc.gov.uk/council/corporate>

This policy is based on established good practice and guidance from the Society of Local Council Clerks.