BATTLE TOWN COUNCIL

MEDIA AND COMMUNICATIONS POLICY

1. Introduction

1.1 This Policy has regard to the Code of Recommended Practice on Local Authority Publicity issued under section 4 of the Local Government Act 1986 and overseen by the Ministry of Housing, Communities and Local Government (MHCLG). The Code is statutory guidance and the Council must have regard to its provisions in all publicity and communications activity.

1.2 This Policy also reflects relevant legislation and guidance including:

- The Local Government Transparency Code
- The Data Protection Act 2018 and UK GDPR
- The Freedom of Information Act 2000
- The Equality Act 2010
- The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018
- Other applicable legislation and statutory guidance

1.3 Failure to follow this Policy may expose the Council to reputational, financial or legal risk. All Councillors and Officers must comply with this Policy.

1.4 This Policy should be read in conjunction with the Members' Code of Conduct, Standing Orders, Data Protection Policy, Freedom of Information Policy and other relevant governance documents.

2. Strategic Communications and Publicity

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2.1 The Council is committed to open, transparent and timely communication with residents, stakeholders and the media.

2.2 The Council will adopt a proactive and professional approach to communications, ensuring information is clear, factual, objective and written in plain English.

2.3 A digital-first approach will be taken where appropriate, while ensuring residents who do not use digital channels are not excluded.

2.4 Agendas and supporting documents for Council and Committee meetings will be published in accordance with statutory notice requirements and Standing Orders, subject to confidentiality and data protection considerations.

2.5 Published materials will comply with accessibility requirements and aim to meet WCAG 2.1 AA standards.

3. Principles of Communication

In accordance with the Code of Recommended Practice on Local Authority Publicity, all publicity and communications issued by the Council will:

- Be lawful
- Be cost effective
- Be objective
- Be even-handed
- Be politically neutral
- Be appropriate
- Have regard to equality and diversity
- Be issued with care during periods of heightened sensitivity
- Comply with data protection and freedom of information legislation
- Be accessible and inclusive
- Represent value for money
- Be conducted with an emphasis on sustainability wherever possible

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4. Official Council Press Releases

4.1 Official press releases are issued on behalf of the Council as a corporate body.

4.2 Drafting may involve the Chairman, Vice-Chairman or relevant Committee Chairman; however, the Town Clerk (or nominated Officer) is responsible for approving and issuing all official press releases.

4.3 Press releases must:

- Reflect the corporate position of the Council
- Contain accurate and factual information
- Avoid party-political content
- Not promote the views of specific political groups
- Not identify Councillors by political affiliation

4.4 Press releases will be published on the Council's website and shared with appropriate media outlets. Content may be adapted for social media platforms.

4.5 All press releases form part of the Council's official record and may be subject to Freedom of Information requests.

5. Media Enquiries and Interviews

5.1 All media enquiries must be directed to the Town Clerk in the first instance.

5.2 The Town Clerk, in consultation with the Chairman where appropriate, will determine the appropriate spokesperson.

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5.3 Officers authorised to speak on behalf of the Council must provide factual and professional information only and must not express personal opinions on Council policy.

5.4 Councillors authorised to speak must represent the agreed corporate position of the Council.

5.5 Councillors speaking in a personal capacity must make it clear that their views do not represent the official position of Battle Town Council.

6. Pre-Election Period

6.1 During the period between the publication of the Notice of Election and polling day (the pre-election period), the Council will comply strictly with the Code of Recommended Practice on Local Authority Publicity.

6.2 During this period:

- The Council will not publish material that could reasonably be perceived as supporting or opposing any political party or candidate.
- New or controversial initiatives will not be publicised unless operationally necessary.
- All communications activity will be managed and approved by the Town Clerk.
- Social media activity will be monitored to ensure political neutrality.

7. Social Media

7.1 The Council may maintain official social media accounts on platforms approved by the Town Clerk.

7.2 Ownership and administrative control of all official accounts will remain with the Council.

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If a Councillor has not been specifically authorised by the Council to speak to the media on a particular issue, a Councillor who is asked for a comment should make it clear that it is a personal view and ask that it be clearly reported as such.¶
¶
Publicity during elections¶
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 (purdah), all proactive publicity about candidates is halted.¶
During the purdah period, all Council publicity shall be managed by the Clerk (or other nominated Officers), and any quotes provided in support of press releases will be given by authorised Officers.¶
¶
Social media¶
The Council recognises that for some residents, accessing information via social media platforms is their preferred method. While there are too many social media sites to include all of them, the Council will endeavour to use those which are most widely used, and regularly review the type and number of social media sites used.¶
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Social media sites will be used to support other communications issued by the Council, and will help provide a consistent message across all media formats. To help achieve this, all social media releases will approved by the …

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7.3 All content published via official Council accounts must be approved by the Town Clerk or nominated Officer.

7.4 Councillors' personal social media accounts are not official Council channels. Councillors must not imply that personal views represent those of the Council.

7.5 The Council reserves the right to moderate comments on its social media platforms. Comments may be removed where they are unlawful, defamatory, discriminatory, abusive, misleading or otherwise inappropriate.

7.6 Social media content may constitute an official record and may be subject to data protection and Freedom of Information legislation.

8. Confidentiality and Conduct

8.1 Councillors and Officers must not disclose confidential information, including matters discussed under confidential agenda items or private briefings.

8.2 Councillors and Officers must act with integrity when representing or acting on behalf of the Council.

8.3 Councillors communicating in a personal capacity should avoid using Council branding or titles in a manner that implies they are expressing the official view of the Council.

8.4 Failure by Councillors to comply with this Policy may result in a complaint under the Members' Code of Conduct.

8.5 Failure by Officers to comply may result in disciplinary action.

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Any Councillor failing to follow the guidelines set out in this policy may find themselves in breach of

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9. Crisis and Emergency Communications

9.1 In the event of a major incident or reputational risk, the Town Clerk will coordinate all communications.

9.2 A single authorised spokesperson will be appointed.

9.3 Communications will prioritise public safety, factual accuracy and timely updates.

9.4 The Council will liaise with relevant partner authorities and emergency services where appropriate.

10. Data Protection and Privacy

10.1 Personal data will only be published where there is a lawful basis under the Data Protection Act 2018 and UK GDPR.

10.2 Photographs or recordings of identifiable individuals will only be published where appropriate consent or another lawful basis applies.

10.3 Care will be taken to avoid publishing confidential or sensitive information.

11. Equality, Accessibility and Inclusion

11.1 The Council will comply with the Public Sector Equality Duty under the Equality Act 2010.

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11.2 Information will be provided in alternative formats upon request where reasonably practicable.

11.3 Communications will seek to be inclusive and accessible to all sections of the community.

12. Policy Review

12.1 This Policy will be reviewed at least every two years, or sooner if legislation or guidance changes.

12.2 Responsibility for implementation and monitoring rests with the Town Clerk.

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