Appendix Q

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COMMUNICATIONS STRATEGY 2023

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1 INTRODUCTION

This strategy will focus the communication efforts of the Berwick Town Council to support effective and efficient activity to serve Berwick-upon-Tweed areas and our wider audiences (referred collectively as 'our community').

1.1 Policy context

This policy is advised by the Code of Recommended Practice on Local Authority Publicity ('the Code'). The Code is statutory guidance and the Town Council must have regard to it and follow its provisions.

It also takes account of national guidance, for example 'The Good Councillor's Guide 2018 (National Association of Local Councils – 'The Guide').

1.2 The need for a communications strategy

Strategic communications are essential to the success of any modern organisation, especially in a changing environment with challenging times, and the growth of digital technologies. Berwick Town Council has a duty to understand and communicate effectively with our target audiences. This means to engage effectively with residents, partners, employees and stakeholders. Better communications lead to recognition, trust and respect. As a Town Council, we need to effectively project who we are and what we do. The more people know about an organisation, the more likely they are to rate it positively.

Achieving the council's aims and objectives requires good communication with every individual, group and organisation we work with, or provide services for.

Proper co-ordination is necessary to make sure messages communicated by the Town Council are consistent and accurate. Properly managed communication means the Town Council can create and seize opportunities to communicate with our community and partners to build an accurate and positive reputation.

1.3 What should we be communicating?

Research by MORI, an independent research organisation, and the Local Government Association, identifies the most important drivers of council reputation among local residents as:

- Perceived quality of services overall
- Perceived value for money
- Media coverage
- Direct communications
- Council performance
- Clean, green and safe environment
- Positive experiences of contact with council employees and contractors.

If the council is to build a strong reputation, be trusted by residents, effectively inform and engage our community, and improve customer satisfaction, then these drivers must form the basis of our communications strategy.

There is also a need for both proactive and reactive information:

- Proactively telling people information to influence and change attitudes
- Reactively giving residents and visitors information they want to know

2 COMMUNICATION OBJECTIVES and PRINCIPLES

2.1 Communication Objectives

- Obj. 1. To promote **confidence** in Berwick Town Council as a high-quality organisation, focusing on our key priorities to help make Berwick a premium place to live, work, prosper, and visit.
- Obj. 2. To help ensure the council is **transparent** and able to be held to account through the provision of a range of information about our activities.
- Obj. 3. To use the best **communication tools** to proactively and positively tell the story of Berwick Town Council and to make sure the information we provide is **accessible** for the whole community.
- Obj. 4. To ensure the Town Council is aware of and **responds** in a timely manner to what the people of Berwick and areas want and need to know; **responding** promptly, effectively and efficiently to inquiries from the **media**, stakeholders and our community
- Obj. 5. To ensure our messages are **relevant**, clear and factual for maximum impact and **interaction** between the Town Council and our community.
- Obj. 6. To ensure regular communication between the Town Councillors and the **County Councillors**, for coordinated actions to the benefit of the town and community
- Obj. 7. To ensure our **website** and digital channels guide interaction with our audiences and enhance customer experience and service delivery.
- Obj. 8. To support an informed and engaged **workforce** through relevant and accessible internal communication channels.

2.2 Communication Principles

Five principles underpin this strategy. Our communication channels need to:

- a) Be accessible for all
- b) Be convenient to access
- c) Help manage expectations
- d) Be relevant, clear and factual
- e) Encourage two-way positive engagement and to 'act together'.

3 COMMUNICATION CHANNELS

3.1 Types of Communication

The type of communication channels used will depend on the target audience and the messages to be communicated. These could include:

- 1. Town Council website
- 2. Social Media
- 3. Consultations, surveys and feedback forms
- 4. Correspondence (general)
- 5. Direct responses (email, phone, in person representations)
- 6. Town Council meetings
- 7. Town Council committees or working groups
- 8. Nominated Town Council spokesperson (e.g., for press or social media responses)

- 9. Annual Town Meeting
- 10. Quarterly meetings with County Councillors
- 11. Individual Town Councillors
- 12. Posters, flyers, newsletters (printed and email) to agreed distribution locations
- 13. Notice boards and office front windows cleaned and updated at least monthly
- 14. Features submitted to newsletters of other local organisations
- 15. Networking links with partners/stakeholders.

3.2 Identifying newsworthy items

It is the responsibility of all Councillors and officers to identify newsworthy items in line with the objectives of this communication policy. These will include a range of Town Council decisions, activities and successes. It is the responsibility of the Town Clerk to make the decision as to what channel(s) of communication to use, and whether or not a press release should be issued.(See also section 4.1).

3.3 Website

The Town Council website is an important vehicle for promoting the Town Council to build trust and reputation with the community and help meet council objectives.

3.3.1 The website will:

- a) Contain useful information about Berwick Town Council, its meetings, activities, services, market, possible small grant funding, and contact information
- b) Contain information about Berwick and events that will be useful to residents and visitors
- c) Be engaging and promptly kept up-to-date

3.3.2 The website will not:

- d) contain content that may result in actions for libel, defamation or other claims for damages
- e) be used to process personal data other than for the purpose stated at the time of capture
- f) promote any political party or be used for campaigning
- g) promote personal financial interests or commercial ventures
- h) be used for personal campaigns
- i) be used in an abusive, hateful or disrespectful manner.

3.4 Social media

Social media can also be used by the Town Council as an effective and measurable way to achieve resident engagement and attract publicity.

Councillors and officers need to make sure that:

- engagement with social media users and promotion of council services through social media is positive and accurate
- a consistent approach is adopted and maintained in the use of social media
- Town Council information remains secure and is not compromised through the use of social media
- users operate within existing policies, guidelines and relevant legislation
- the Town Council is not brought into disrepute.

Social media activity does not stand alone. To be effective it needs to be integrated as part of the general communications mix. Any planned campaigns, promotions and activities can be included in social media platforms to increase reach and exposure.

Berwick Town Council's social media policy is attached as an Appendix in section 10

3.5 Town Council and Committee Meetings

- (i) Agendas should be clear and concise, with text relating to each item and not just reference numbers, so that everyone can understand the agenda items. Background papers should contain sufficient information to enable Councillors to make an informed decision, and for the public to understand what matters are being considered and what decisions are to be taken at a meeting.
- (ii) Items for information should be kept to a minimum on an agenda.
- (iii) Where the Town Clerk or a Councillor wishes fellow Councillors to receive matters for "information only", this information will be circulated via the Clerk.
- (iv) The Town Clerk will promptly deal with all correspondence and required actions following a meeting, and distribute confidential draft mins of all meetings within 10 working days after the meeting, to enable all staff and Councillors to catch up with decisions and actions to be taken.

4 INTERACTIONS WITH THE MEDIA

The Town Clerk co-ordinates all formal media enquiries to the Town Council. Councillors and officers who are directly approached by the media should not attempt to answer questions themselves without first establishing the full facts. If Councillors are in any doubt, they should consult the Town Clerk.

4.1 Press releases

The use of press releases is a key technique for publicising Town Council decisions, activities and achievements. An official Town Council press release is made on behalf of the Town Council as a whole; it will be written and issued by the Town Clerk after approval by the Mayor, deputy Mayor or the Councillor nominated as the Press Officer.

Official Town Council press releases will follow a corporate style appropriate for the media being targeted and a central record will be maintained. All releases will accurately reflect the corporate view of the Town Council, contain relevant facts and may include an approved quotation from an appropriate Town Councillor.

Town Council press releases will not promote the views of specific political groups, publicise the activities of individual Councillors, identify a Councillor's political party or persuade the general public to hold a particular view. All official Town Council press releases will be placed on the Town Council's website within one working day of issue.

4.2 Interviews

Any member of staff or Councillor who is contacted by a journalist requesting an interview in their capacity as a representative of the Town Council should refer the matter to the Town Clerk. The situation and the information required by the journalist will inform the choice of person put forward for interview. Officers should never give their opinion on specific Town Council policy but must keep to the corporate line and key messages, their role being to provide expertise and factual knowledge only in support of the Town Council's approved and agreed policies.

If a Councillor makes any comment to the press without checking with the Town Clerk, they must make it clear that they not representing the Town Council but giving a personal view and request that it be clearly reported as their personal view.

4.3 Media coverage of council meetings

Provision is made for members of the media to attend Town Council and Committee meetings. During meetings, Councillors and officers should be mindful that any comments and messages are conveyed in a manner which gives the journalist an accurate picture rather than relying on the journalist's interpretation of what may be a complex issue.

Where a meeting of the Town Council and its committees includes an opportunity for public participation, the media may speak and ask questions. Public participation is regulated by the Town Council's Standing Orders. Both the media and the public are entitled to film and record council meetings held in public.

When a journalist or a member of the public asks a question on Town Council decisions, financing or activities, brief accurate factual information should be provided. If this is not possible at the time, a record of the request should be made and the information provided to the individual at the soonest appropriate opportunity – if they wish, they can provide their name and contact information. If relevant, the information should also be provided in the next Council Newsletter and/or at the next Council meeting.

The Town Council should not pass comments on leaks, anonymous allegations or allegations about individual staff and Councillors. The phrase "no comment" should not be used as a response to a media enquiry. The Town Council is open and accountable and should always try to explain if there is a reason why it cannot answer a specific enquiry.

4.4 Correcting inaccurate reporting

Should the media publish or broadcast something inaccurate about the Town Council, a quick decision needs to be taken on any action necessary to correct it. The issue should be discussed with the Town Clerk, the Mayor, the deputy Mayor or the Councillor nominated as the Press Officer. Action to be taken could be a letter or news release, a conversation with the journalist concerned, a personal letter to the editor or legal advice. It will also be necessary to decide who is the most appropriate person to take the agreed action.

It should be noted that in the case of minor inaccuracies which have little or no impact on the message being conveyed, it can sometimes be counterproductive to complain; each case should be judged individually.

4.5 Managing negative issues

From time to time the Town Council has to respond to negative issues. It is important that these situations are managed carefully so as to limit the potential for negative publicity.

Councillors and officers must alert the Town Clerk as soon as a potentially negative issue, which may attract media interest, is known. They should not wait until contact is made by the media. Councillors and officers must work together to prepare holding statements, other information and carry out research to be prepared, even if no media have yet contacted the Town Council about the issue.

If Councillors receive a complaint from a member of the public, this should be dealt with under the Council's adopted complaints procedure. See Annex in Section 9.

Occasionally the Town Council will get something wrong. In these cases, damage limitation is the key – this can usually be achieved by admitting the mistake, apologising and stating how the Town Council will learn from the error and put it right.

5 FREEDOM OF INFORMATION

- i. Should the Town Council receive a request for information under the Freedom of Information Act 2000 on a topic on which there is correspondence (written or email), that correspondence will normally have to be disclosed unless it is exempt. The fact that the disclosure may prove embarrassing would not, in itself, prevent disclosure. In addition, care should be taken when processing personal data.
- ii. The Data Protection Act 2018 prevents the use of personal information other than for the purposes for which it was initially supplied. Councillors should bear this in mind when using any personal data which may be supplied to them by their constituents.
- iii. No individual Councillor or Officer should be the sole custodian of any correspondence or information in the name of the Town Council, a committee, subcommittee or working party. In particular, Councillors and officers do not have a right to obtain confidential information/documentation unless they can demonstrate a 'need to know'
- iv. The Town Council cannot disclose confidential information or information which cannot lawfully be disclosed. The Town Council cannot disclose information if this is prohibited under the terms of a court order, by legislation, the Town Council's standing orders, under contract or by common law. Town Councillors are subject to additional restrictions about the disclosure of confidential information which arise from the code of conduct adopted by the Town Council, a copy of which is available via the Town Council's website.

6 INDIVIDUAL COUNCILLOR POLICY

The purpose of this policy is to clarify the roles and responsibilities of all Councillors and officers involved in dealing with the media and to provide guidance on how to handle media interest. It is also to ensure that the Town Council is seen to communicate in a professional and objective manner.

This policy does not seek to regulate Town Councillors in their private capacity but does provide advice and guidance on their sensible use of conventional and social media. The Town Council's communications with the media seek to represent the corporate position and views of the Town Council. If the views of individual Councillors are different to the Town Council's corporate position and views, it is the responsibility of every Councillor to make this distinction clear.

Subject to the obligations on Councillors not to disclose information referred to in Section 5, and not to misrepresent the Town Council's position, Councillors are free to communicate their own position and views.

6.1 Councillor communications

In all cases, the Town Council's approach, in accordance with the Code and the Guide, is that all individual Councillor communications should:

- a) be lawful
- b) be objective
- c) be even-handed
- d) be appropriate
- e) have regard to the Town Council's policies, particularly Equality and Diversity
- f) be issued with care during periods of heightened sensitivity (e.g., elections)
- g) be cost effective

If in doubt, never say anything you will be uncomfortable repeating in court.

6.2 Councillor correspondence to external parties

As the Town Clerk should be sending most of the council's correspondence from a Councillor to other bodies, it needs to be made clear that it is written in their official capacity and has been authorised by the Town Council. A copy of all outgoing correspondence relating to the council or a Councillor's role within it, should be sent to the Clerk, and it be noted on the correspondence, e.g., "copy to the Clerk" so that the recipient is aware that the Clerk has been advised.

6.3 Councillor communication with Town Council Staff

Councillors may only give instructions to a member of Council staff, if authorised by a committee or sub-committee with appropriate delegated powers from the full Council. In any case, even if an individual Councillor has been given delegated authority, they may only give instructions to the Clerk or a member of Council staff which are consistent with Council policies and decisions.

7 PUBLICITY DURING ELECTIONS

The rules governing publicity change 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 and other politicians is halted. This applies to scheduled local, or national elections, plus referenda.

During this period Town Council communications should not deal with controversial issues or report views, proposals or recommendations in a way that identifies them with individual Councillors or groups of Councillors. This is to make sure that no individual Town Councillor or political party gains an unfair advantage by appearing in corporate publicity. In these circumstances, where a quote is required, the relevant officer may be quoted, in accordance with the guidelines in this policy.

The Electoral Commission requires that candidates provide a return of expenditure on any form of advertising or campaign literature – this includes web advertising. There are additional requirements, such as imprint standards, for materials which can be downloaded from a website. Full guidance for candidates can be found at www.electoralcommission.org.uk

Accounts may need to be closed for a defined period before local and national elections in order to comply with legislation which affects local authorities.

Political blogs cannot be linked from the Town Council's website and the Town Council will not promote Councillors' Twitter accounts during the election purdah period.

Town Councillors are reminded that they must not misuse Town Council resources for political or other inappropriate purposes. Any queries regarding publicity during a purdah period should always be referred to the Town Clerk for further advice.

8 EVALUATION and REVIEW

The Town Clerk with the Finance and Administration Committee of Berwick Town Council (BTC) will oversee implementation of this communication strategy through an annual communications action plan with clearly stated priorities and delegated tasks.

Evaluation will be in March each year with a report ready for the annual Town Meeting in May.

Evaluation will be based on:

- a) Evidence of completion of annual communications action plans
- b) Evidence of improved trust among residents
- c) Increase in number of residents attending council, committee and annual town meetings
- d) Number of recorded responses to questions raised by the public at council meetings (see section 3.5)
- e) Increase in Town Council's social media following
- f) Accuracy of Town Council press releases (see section 4.1)
- g) Proportion official Town Council press releases placed on the Town Council's website within one working day of issue.
- h) Proportion of positive (instead of negative) letters about BTC in local newspapers
- i) Proportion of positive (instead of negative) comments about BTC in social media
- j) Information from surveys of residents in Berwick and areas, if available from a reliable source.
- k) See also evaluation of the Complaints Policy and Procedure.

Baselines for the above indicators need to be established and recorded each year in the report for the annual Town Meeting.

This Communication Strategy will be reviewed every three to five years by the Finance and Administration Committee, and all final decisions on content and changes will be taken by the full Town Council

Approved by full Town Council _____

Date for next review: _____(in 5 years' time)

APPENDICES

9 COMPLAINTS POLICY and PROCEDURE

Complaints are valuable because they provide a chance to put things right if there has been an error, and to make sure that the same mistake is not repeated. It is essential that complaints are dealt with positively. The Town Council is keen to hear people's comments and is committed to making full use of complaints information to contribute to continuous service improvement.

9.1 Definition of a complaint

A complaint is any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Town Council or its staff which affects an individual customer or group of customers.

The complaints procedure will deal with matters of maladministration. This may be if the Town Council does something the wrong way, fails to do something it should do, or does something it should not do. Some examples include:

- Neglect or unjustified delay
- Malice, bias, or unfair discrimination
- Failure to tell people their rights
- Failure to provide advice or information when reasonably requested
- Providing misleading or inaccurate advice
- Inefficiency, ineffectiveness, bad and unprofessional practice or conduct.

The complaints procedure will not deal with:

- Complaints for which there is a legal remedy or where legal proceedings already exist.
- Complaints about employment matters the Town Council operates alternative procedures to deal with grievances or disciplinary matters against staff.

9.2 Equal Opportunities

The Town Council is committed to equal opportunities. Complaints feedback will be used to highlight discriminatory practices, and to promote equality of opportunity.

Complaints by members of the public of discrimination and/or harassment against the Town Council will be dealt with through the complaints procedure unless it is a complaint that should be dealt with through a statutory procedure.

9.3 Complaints Officer

The Complaints Officer for the Town Council is the Town Clerk. Their main duties are:

- i. The day-to-day operation and management of the procedure, including providing a reference point for staff queries on informal complaints.
- ii. To oversee, and undertake where necessary, the investigation of formal complaints at the first stage, within the relevant time scales.
- iii. To maintain a record of all complaints received including details of the nature of the complaint, action taken, outcome, and time taken to resolve.
- iv. To identify improvement points arising from any complaints.
- v. To identify staff training issues.

Certain types of complaint should be referred directly to the Mayor or to Northumberland County Council. These will be complaints about individual Councillors.

9.4 Complaints Procedure

- i. If a complaint about procedures or administration is notified orally to a Town Councillor or to the Town Clerk and they cannot satisfy the complainant fully forthwith, the complainant shall be asked to put the complaint in writing to the Town Clerk and the complainant assured that it will be dealt with promptly after receipt. If a complainant prefers not to put the complaint to the Clerk, s/he shall be advised to put it to the Mayor. On receipt of a written complaint the Mayor or Town Clerk, as the case may be, shall (except where the complaint is about his/her own actions) try to settle the complaint directly with the complainant but shall not do so in respect of a complaint about the behaviour of the Clerk or Councillor without first notifying the person complained of and giving him/her an opportunity for comment on the manner in which it is intended to attempt to settle the complaint.
- ii. Where the Mayor or Town Clerk receives a written complaint about his or her own actions s/he shall forthwith refer the complaint to the full Council. The Mayor or Town Clerk shall report to the next meeting of the Council any written complaint disposed of by direct action with the complainant.
- iii. The Clerk or Mayor shall bring any written complaint which has not been settled to the next meeting of the Council and the Clerk shall notify the complainant of the date on which the complaint will be considered, and the complainant shall be offered an opportunity to explain the complaint orally at the meeting.
- iv. The Council shall consider whether the circumstances attending any complaint warrant the matter being discussed in the absence of the press and public but any decision on a complaint shall be announced at the Town Council meeting in public.
- v. As soon possible after the decision has been made, the decision and the action to be taken shall be communicated in writing to the complainant.
- vi. The Council shall defer dealing with any written complaint only if it is of the opinion that issues of law or practice arise on which advice is necessary to seek from NALC or other sources, legal advice or it is to be /being investigated by a statutory body. The complaint shall be dealt with at the next meeting after the advice has been received or the result of the aforementioned investigations being known.

Evaluation and Review 9.5

The Town Clerk with the Finance and Administration Committee of Berwick Town Council (BTC) will oversee implementation of this Complaints Policy and Procedure. Evaluation will be based on:

- a) Record of all complaints received including details of the nature of the complaint, action taken, outcome, and time taken to resolve
- b) Improvements implemented arising from complaints received
- c) Staff training undertaken based on complaints received

Approved by full Town Council _____

Date for next review: (in 5 years' time)

10 SOCIAL MEDIA and ELECTRONIC COMMUNICATIONS POLICY

10.1 Policy context

The aim of this policy is to set out a Code of Practice to provide guidance to Councillors, council staff and others who engage with the Council using online communications, collectively referred to as social media.

Social media is a collective term used to describe methods of publishing on the internet. This policy covers all forms of social media and social networking sites which include (but are not limited to):

- Town Council Website
- Facebook other social networking sites
- X (previously known as Twitter) and other micro blogging sites
- YouTube and other video clips and podcast sites
- Email

10.2 Social media policy and other Town Council policies

The use of social media does not replace other existing forms of communication.

The principles of this policy apply to Councillors and council staff and also applies to others communicating with the Town Council.

The policy sits alongside relevant existing polices which need to be taken into consideration.

The current Code of Conduct applies to online activity in the same way it does to other written or verbal communication.

Individual Councillors and council staff are responsible for what they post in a council and personal capacity.

In the main, Councillors and council staff have the same legal duties online as anyone else, but failure to comply with the law may have more serious consequences.

10.3 Social media may be used to

- Distribute agendas, post minutes and dates of meetings
- Advertise events and activities
- Good news stories, linked website, or press page
- Vacancies
- Re-tweet or share information from partner agencies such as Principal Authorities, Police, Library, Health etc.
- Announcing new information
- Post or Share information from other local community groups such as schools, sports clubs, community groups and charities
- Refer resident queries to the clerk and all other Councillors

10.4 Social Media Code of Practice

When using social media (including email) Councillors and council staff must be mindful of the information they post in both a personal and Council capacity and keep the tone of any comments respectful and informative.

Online content should be accurate, objective, balanced and informative.

When using social media Councillors and council staff must not:

- hide their identity using false names or pseudonyms
- present personal opinions as that of the Town Council
- present themselves in a way that might cause embarrassment to the Town Council
- post content that is contrary to the democratic decisions of the Town Council
- post controversial or potentially inflammatory remarks
- engage in personal attacks, online fights and hostile communications
- use an individual's name unless given written permission to do so
- publish photographs or videos of minors without parental permission
- post any information that infringes copyright of others
- post any information that may be deemed libel
- post online activity that constitutes bullying or harassment
- bring the Town Council into disrepute through content posted in any capacity
- post offensive language relating to race, sexuality, disability, gender, age, religion or belief
- conduct any online activity that violates any laws, or regulations, or constitutes a criminal offence

10.5 Social media and the law.

- i. Publishing untrue statements about a person which is damaging to their reputation is libel and can result in a court action and fine for damages.
- ii. This also applies if someone else publishes something libellous on your social media site. A successful libel claim will result in an award of damages against you.
- iii. Posting copyright images or text on social media sites is an offence. Breach of copyright will result in an award of damages against you.
- iv. Publishing personal data of individuals without permission is a breach of Data Protection legislation is an offence.
- v. Publication of obscene material is a criminal offence and is subject to a custodial sentence.
- vi. Councillor's views posted in any capacity in advance of matters to be debated at a Town Council or committee meeting may constitute Pre-disposition, Pre-determination or Bias and may require the individual to declare an interest at council meetings
- vii. Anyone with concerns regarding content placed on social media sites that denigrate Councillors, council staff or residents should report them to the Town Clerk.
- viii. Misuse of social media content that is contrary to this and other policies could result in action being taken.
- ix. The Town Clerk, or delegated officer, is nominated as moderator of the Town Council's social media output and is responsible for posting and monitoring content to ensure it complies with this Social Media & Electronic Communications Policy.
- x. The moderator will have authority to remove any posts made by third parties from the Town Council's social media pages which are deemed to be defamatory or libellous .

Approved by full Town Council _____

Date for next review: _____(in 5 years' time)