

# Cockfield Parish Council

## Electronic Communications and Social Media Policy

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### Electronic Communication General Policy

The use of digital and electronic communication enables the Parish Council to interact in a way that improves the communications both within the Parish Council and between the Parish Council and the people, businesses and agencies it works with and serves.

The Parish Council owns and operates a website and uses email to communicate both internally between councillors and external third parties. The Parish Council will always try to use the most effective channel for its communications. Over time the Parish Council may add to the channels of communication that it uses as it seeks to improve and expand the services it delivers. When these changes occur, this policy will be updated to reflect the new arrangements.

Communications from the Parish Council shall meet the following criteria:

- Be civil, tasteful and relevant;
- Not contain content that is knowingly unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive;
- Not contain content knowingly copied from elsewhere, for which we do not own the copyright;
- Not contain any personal information, other than necessary basic contact details;
- If official council business it will be moderated by the Clerk to the Parish Council to ensure legal/financial/ethical compliance prior to publication.

In order to ensure that all discussions on the Parish Council site are productive, respectful and consistent with the Council's aims and objectives, we ask you to follow these guidelines:

- Be considerate and respectful of others. Vulgarity, threats, abuse of language will not be tolerated.
- Differing opinions and discussion of diverse ideas are encouraged, but personal attacks on anyone, including the Parish Council members or staff, will not be permitted.
- When sharing information from third parties be aware of copyright laws; be accurate and give credit where credit is due. (i.e. Logos, Pictures, Phrase's etc) seek permission if required.
- Stay on topic.
- It is not permitted to use the Council's electronic media for commercial purposes or to advertise market or sell products.

Where necessary, we may direct those contacting us to our website to see the required information, or we may forward their question to one of our Parish Councillors for consideration and response. We may not respond to every comment we receive particularly if we are experiencing a heavy workload.

## Parish Council E-Mail

The Clerk to the council has their own email address (parish.council@cockfield.org.uk.) The email account is monitored mainly during office hours, Monday to Friday, and we aim to reply to all queries within 10 working days.

The Clerk is the primary contact on behalf of the council for dealing with email received and passing on any relevant mail to councillors or external agencies for information and/or action. All communications on behalf of the Council will usually come from the Clerk, Councillors are permitted to publish information/answer a query in some cases (Please refer to the General Communications Protocols below) with a majority vote of the Council, in any case correspondence shall be copied to the Clerk or another Councillor.

Emails sent by Parish Council/Councillors become official and will be subject to The Freedom of Information Act. Emails that are sent on behalf of the Parish Council and any responses received in respect of the email sent should not be deleted to ensure that a complete and proper record of all correspondence is kept. (Retention period of data is 7 years , if a Councillor leaves office, copies of mails should be sent to the Clerk).

It is not required to retain incoming mails that are not relevant to normal Parish Council business or those that may just need a simple confirmation.

### **Parish Councillors E-Mail**

Each councillor shall receive an individual email account for use with council business, it is mandatory that any communication between councillors or external agencies shall use this medium.

Councillor E-Mail address shall be in the following format:

cllr.surname@cockfield.org.uk

Any communication regarding Parish Council business via private/personal email accounts is not permitted and is not endorsed via the Parish Council.

As more and more information becomes available electronically, it is vital that all information is treated sensitively and securely. Parish Councillors are expected to maintain an awareness of the confidentiality of information that they have access to and not to share confidential information with anyone. Failure to properly observe confidentiality may be seen as a breach of the Parish Council's Code of Conduct and will be dealt with through its prescribed procedures (at the extreme it may also involve a criminal investigation).

Councillors should be careful only to cc essential recipients on emails and avoid use of the 'Reply to All' option (whilst ensuring that the people who need to know the information are copied in), and ensure that email trails have been removed.

## **SMS (Texting,WhatsApp,iMessage etc)**

Councillors and the Clerk may use SMS as a convenient way to communicate at times.

All are reminded that policy rules also apply to such messages even though they may be performed on personal devices, relevant communications should be stored and if required access to information shall be made available to the Parish Council, Clerk or any external legal agency on the receipt of an official request.

## **General Communication Protocols**

The following general communication protocols and procedures are primarily applicable to Email messages sent and received by Councillors, the protocols should also be observed for communication by any other means including verbal conversations.

The protocols are intended to protect Councillors and the Parish Council from possible litigation or investigation should information be conveyed that does not express the majority view of the Parish Council, or should bring a Councillor or the Parish Council in to disrepute.

### **1. Financial Matters**

Any communication containing financial information shall be administered only by the Clerk to the Council. Individual Councillors are not permitted to answer a financial question; any correspondence should be forwarded to the Clerk.

Councillors are permitted to acknowledge a receipt of a communication; the acknowledgment should state the matter will be addressed by the Clerk /Parish Council.

### **2. Planning**

Any communication regarding Planning shall be administered only by the Clerk to the Council. Individual Councillors are not permitted to answer a Planning query; any correspondence should be forwarded to the Clerk.

Councillors are permitted to acknowledge a receipt of a communication, the acknowledgment should state the matter will be addressed by the Clerk /Parish Council Planning Working Group.

### **3. Complaints**

Any communication regarding a complaint against the Council or Councillor shall be administered only by the Clerk to the Council. Individual Councillors are not permitted to answer a query containing a complaint in any form; any correspondence should be forwarded to the Clerk.

Councillors are permitted to acknowledge a receipt of a communication, the acknowledgment should state the matter will be addressed by the Clerk /Parish Council.

### **4. One to One Communications.**

Councillors should avoid one to one communications with outside parties wherever possible where content could be considered contentious, if in doubt discuss with the Clerk or another Councillor before responding and copy them in any response.

Councillors are permitted to answer any general queries if the information provided is within the public domain i.e. redirection to an appropriate person or body, confirmation of dates etc.

Councillors are permitted to answer queries relating to their assigned roles, queries shall be deferred if a proposal to the Parish Council is required to complete an action. Examples of assigned roles include Cemetery, Footpaths, Maintenance, Emergency Response and Allotments.

The Parish Council is continually looking at ways to improve its working and the use of electronic communications is a major factor in delivering improvement. Parish Councillors are expected to abide by the SALC Code of Conduct and this tailored Communication Media Policy in all their work on behalf of the Parish Council.

This policy will be reviewed as and when considered appropriate.

## Cockfield Village Website

### Website Hosting

The Parish Council is committed to operating a website hosted by a 3<sup>rd</sup> party provider, having no other connection with the Parish Council. The current system is a “Content Management System” where the Parish Council itself has direct control of day-to-day editing , updating and maintenance.

The Parish Council permits access to the website to other village organisations for the promotion of village activities and events. These organisations are also bound by this policy, all generated content must adhere to the general rules as listed above.

The Parish Council reserves the right to remove any or all of a local group’s information without notice from the web site if it feels that the content does not meet the Parish Council’s rules and expectation for its website. Where content on the web site is maintained by a local group it shall be clearly marked that such content is not the direct responsibility of the Parish Council.

Any misuse of the website facilities provided to an external organisation will result in an immediate suspension of access.

### Website Content

Subject to the requirements of law, the Parish Council has the sole right to determine what should or should not be included on the website.

### Statutory Content

The website shall be used by the Parish Council to:

- Post Minutes , agendas and dates of PC meetings
- Advertise events and activities
- Publish relevant news

- Share information from community partners i.e. Police, Schools, Health Authority etc.
- Advertise PC Vacancies
- Public referral to the Clerk for PC correspondence
- Any other relevant information for public consumption

### Other Content

The website may also contain other material such as history and geography of the Parish, news of local events or any other material of a non-controversial nature that is appropriate for the Website.

Links to external Website that serve the community with impartial information or news will be considered after request at the discretion of the PC Media working group.

Examples: Group or Club Event, Open Days (Commercial/Education), Local Village Promotions etc.

### Website Control

The Clerk and/or nominated Councillor(s) will have administrative/editing access to the website and will be responsible for maintaining and updating the site.

External groups/persons approved by the Parish Council shall also have Editing access to update their own content only.

The Clerk shall be responsible in ensuring all legal obligations are met.

In the event that an Administrator has managed the Website in a manner contrary to the will of the Parish Council, the Parish Council may require the Administrator to make good any deficiencies or in extreme circumstances pass a motion of "No Confidence" in the Administrator and relieve them of their role.

The Clerk shall then apply to the hosting agency for a new individual password to be issued once a new Administrator has been appointed.

Any person with granted access to the website for the purpose of Administration/Editing shall prove competence to do so prior to access being granted. In the case of Councillor's training shall be provided by the Parish Council, other organisations shall arrange/fund their own training as required.

### Community Broadcast System

The Parish Council operates a community broadcast system, this system provide subscribers to the system with local information via an Email service.

The system is primarily concerned with conveying urgent information that may be useful for local residents, the system is administered by members of the PC Media Working Group.

Messages are categorised by level of importance:

Tier 1 Immediate risk to Health, Property, Livelihood (Blue Light Services)

Tier 2 Facility Closures, Road Closures, Utility Issues, Cancellations

Tier 3 Local Events

Tier 1 events may be posted by all those that have access to the system on receipt of information from a relevant service.

Tier 2 events shall be published by the Clerk after receipt of information.

Tier 3 events shall be published at the discretion of the PC Media Working Group.

## General Data Protection and Privacy Policy

### Data Privacy Policy

Cockfield Parish Council is committed to keeping your personal data safe and secure. As part of this commitment, we've updated our Privacy Policy to meet the high standards of the UK data protection law, known as the General Data Protection Regulation (GDPR).

This Privacy Policy sets out how we collect, use, store and protect your personal data. Our Privacy Policy also sets out clear information about your rights in relation to your personal data. Cockfield Parish Council is the Data Controller for personal data about individuals.

### Key Definitions

**Data processing:** Data processing is any activity that involves the use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties. (for example, a spread sheet created or received that may contain lists)

**Personal data:** Personal data is any information identifying a data subject (a living person to whom the data relates). It includes information relating to a data subject that can be identified (directly or indirectly) from that data alone or in combination with other identifiers Cockfield Parish Council possesses or can reasonably access. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that named person's actions or behaviour.

### How we process your personal information

We do not trade personal data for commercial purposes and will only disclose it if required by law, if it is necessary to arrange a service you have asked us for, or if it is with your consent. We will not use your information for automated decision making or profiling. (AI selections, canvassing etc.)

### Information you give to us

This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, email or otherwise. It includes information you provide when you:

- Use our website
- Register for our promotional events
- Register to receive downloadable information, newsletters or other information
- Send us a request to contact you or when you report a problem with our services

The information you give us may include your name, position, address & post code, email address and phone number.

We will use this information to:

- send you information you have requested
- process responses for services
- inform our decision making activities
- provide you with news and information relevant to your request

If you no longer wish us to use your data in this way, please let us know by clicking the unsubscribe button on our communications or by emailing the Parish Council Clerk.

### Information we collect about you

With regard to each of your visits to our website we will automatically collect the following information:

Information about your visit, including items you viewed or searched for; page response times; length of visits to certain pages for statistical analysis (Use of Cookies).

We will use this information:

- to administer our site so that it works well when you visit (we may also ask you for your opinion to help us do that) and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer

Website tracking data may also be collected by 3<sup>rd</sup> party service providers (including, for example, sub-contractors in technical and delivery services (Hosting Agent), search engines to promote our web visibility in search profiles).

### Legal basis for processing your information

We process your personal information lawfully and fairly in accordance with data protection laws. We may process your personal information where we are:

- performing our business functions and activities generally
- providing services to you
- in receipt of your consent to our processing of your personal information
- presented with a legal obligation to do so or we have a legitimate interest to do so, for Example fraud prevention purposes, Freedom of Information request

### Sharing your information

We may disclose your personal information to third parties, including:

- Our professional advisers and services providers with whom we work collaboratively to bring Services and information you have requested. In all circumstances this will be made clear at the time of collecting your data.
- If Cockfield Parish Council or substantially all of its assets are acquired by a third party, in which case personal data held by us about you will be one of the transferred assets.(Dissolution of Parish Council to higher Authority , temporarily or permanently)

- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### Where we store your personal data

All email information you provide to us is stored in our databases on a secure server located within the EEA (European Economic Area).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website or via email service; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### Retention of your personal data

We will only keep your personal data whilst we are providing a service provision to you, data held shall be reviewed periodically and if no longer required will be deleted.

### Your rights under the GDPR

#### Access to personal information

Individuals who are the subject of personal data held by Cockfield Parish Council are entitled to:

- Ask what information the Parish Council holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the Parish Council is meeting its data protection obligations

If an individual contacts the Parish Council requesting this information, this is called a subject access request or SAR. Subject access requests from individuals should be made by email to the Parish Council Clerk.

We will respond to Subject Access Requests within one month as is the requirement under GDPR. We will always verify the identity of anyone making a subject access request before handing over any information.

#### Correcting personal information

Individuals may ask us to correct any personal information about them that is inaccurate, incomplete or out of date.

#### Deletion of personal information

Individuals have the right to ask us to delete personal information about them where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and that consent has been withdrawn
- You have validly objected to our use of your personal information



- Our use of your personal information is contrary to law or our other legal obligations

### Objecting to how we may use personal information

Individuals have the right at any time to require us to stop using their personal information for direct communication purposes. (Broadcasts, Promotion of village events).

### Restricting how we may use personal information

In some cases, individuals may ask us to restrict how we use their personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold or assessing the validity of any objection made by an individual to our use of their information. The right might also apply where there is no longer a basis for using an individual's personal information but they don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with the individual's consent, for legal claims or where there are other public interest grounds to do so.

### Withdrawing consent to using personal information

Where we use personal information with individual consent the individual may withdraw that consent at any time and we will stop using that personal information for the purpose(s) for which consent was given.

For queries as to whether the GDPR applies to the processing of your personal information or, if the GDPR does apply, and you wish to exercise any of these rights then please contact us. Please use the Contact information on our website.

### Changes to our privacy policy

We keep this privacy policy under regular review and will place any updates on this website.

### Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the ICO (Information Commissioner's Office) who are the regulators of data protection laws in the UK. They can be contacted via their website <https://ico.org.uk/make-a-complaint/>.