



RAMSGATE TOWN COUNCIL COMMUNICATIONS POLICY

Adopted	September 2022
Review	As required

1. OVERVIEW

This strategy will focus the communication efforts of the Town Council and support it to be effective and efficient in its activity to serve Ramsgate residents.

This policy is advised by the Code of Recommended Practice on Local Authority Publicity ('the Code'). The Code is statutory guidance, and the Parish Council must have regard to it and follow its provisions. It also takes account of national guidance, for example 'The Good Councillor's Guide 2020 (National Association of Local Councils – 'The Guide').

During any pre-election period, the Council will comply strictly with the Code of Recommended Practice on Local Authority Publicity. Communications must not promote or disadvantage candidates or councillors, or influence public opinion in relation to an election.

Research by Ipsos MORI for the Local Government Association in 2011, states the most important drivers of council reputation among local residents are:

- 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, effectively inform residents, engage and improve customer satisfaction then these drivers must form the basis of our communications strategy.

There is also a need for proactive and reactive information:

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

2. COUNCILLORS

Councillors may be approached by residents with concerns, complaints, observations, ideas and questions. Indeed, this contact is an essential part of the councillors' role. Councillors will need to be sensitive in their dealings with the public and others as this will reflect on Ramsgate Town Council (RTC). Enquiries may be in person, by telephone, letter or email (in the case of email it must be copied to the Town Clerk & Deputy Town Clerk immediately). Councillors must avoid making any promises to any resident about any matter raised with them. However, Councillors may deal with the matter in the following ways:

- Investigate the matter personally, having sought guidance of the Town Clerk, including the wording of any response which must come from the Clerk;
- Give factual information pointing out the relevant minutes on the Council website.
- Refer the matter to the Town Clerk who will then deal with it as appropriate.
- Ask the Town Clerk to place an item on the agenda to discuss the matter.

If a councillor is in doubt as to how to respond to any enquiry, then the "golden rule" should be to seek guidance from the Clerk.

Guidance on Councillor Interaction

- Councillors should always disclose their identity and membership of the parish council;
- All media enquiries should be directed to the Town Clerk or the Chair in the first instance. The response may be delegated to another councillor or officer with particular knowledge of an issue, keeping the Clerk and Chair updated.
- All media comments must accurately reflect RTC's position on the topic, as adopted in documents e.g. minutes and policies.
- All decisions of RTC recorded in the minutes of open meetings can be quoted and made available to the media.
- The person responding to the media enquiry should have the necessary facts and understanding and be able to speak with some authority, using plain English.
- Councillors should never make 'personal comments' which could injure the reputation of RTC or negatively impact on the credibility of the council or members of the community; this may result in a Code of Conduct complaint that would be dealt with by the Monitoring Officer.
- No comment should be made on any matter which is, or is likely to be, subject to legal proceedings. Should this be the case then advice must be sought from RTC's solicitor before any response is made.
- On the rare occasion that Councillors wish to make a 'personal statement', they must make clear:
 - that their comments are made as an individual and are not necessarily the view of RTC;
 - that other councillors may hold a different view;
 - that the matter may still need to be discussed or resolved by RTC.

3. COUNCIL MEETINGS

The agenda allows any member of the public to bring forward ideas and/or make representations to the Council in a Public Session towards the beginning of the meeting.

A maximum time limit of 3 minutes is allowed per individual; however the Chair has discretion on the time allowed.

The Clerk produces draft minutes normally within 7 days of the meeting. These are then circulated to all councillors. The minutes are approved at the next meeting, and the approved version, incorporating any amendments (as per Standing Orders) is then published on the RTC website.

4. OTHER FORMS OF COMMUNICATION

Different forms of communication will appeal to different ages, social groups and demographics, so it is important to ensure that within reason, all options for increasing communication and participation are reviewed over time in order to communicate effectively with everyone. Risks associated with different methodologies must be considered. At the same time many people still rely on the tried and tested traditional methods – newsletters, leaflets, posters, fliers, and notices etc. which still play a fundamental role that must not be undervalued.

RTC's general communication strategy is overseen by the Finance & General Purposes Committee working together with the Marketing & Communications Officer. Overall control of communication strategy rests with the Council.

Forms of communication include:

- Community Ad Magazine (distributed to every house six times per year)
- Posts on the council website [and social media](#)
- Posters on noticeboards
- Fliers
- Press releases
- Public meetings
- Special open meetings

The Marketing & Communications Officer and Finance & General Purposes Committee will continue to explore ways in which communication could be enhanced.

[The Council's website and digital publications will comply with the Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018. Alternative formats will be provided on request.](#)

5. COMMUNICATION - GOOD PRACTICE

It is important that:

- All communication from RTC is appropriate, timely, of interest to the local community, professional and reflects the decisions and policies of council

- Both the officers and councillors communicating on behalf of RTC need to be aware that all communication(s) reflect(s) on the reputation of RTC in the community Communication and must:
 - have a defined purpose;
 - be civil, tasteful and relevant;
 - not contain content that is knowingly unlawful, libellous, defamatory, abusive, threatening, obscene, profane, sexually oriented or racially offensive; (All communications must also comply with the Equality Act 2010. Communications must not be discriminatory, harassing, or offensive, including in digital and social-media environments. Reasonable steps will be taken to ensure communications are accessible and inclusive.)
 - not unwittingly or knowingly contain content subject to copyright obtained from elsewhere unless it has been used with the express permission of the copyright owner;
 - not contain any personal information, other than necessary basic contact details. In the case of official business, be referred to the Chair or the Clerk prior to release;
 - social media must not be used for the dissemination of any political advertising.

Equally, RTC expects that all incoming communications will meet the above criteria. RTC will not respond to any communication that does not meet the above standards.

Councillors must keep in mind the Seven Principles of Public Life, the Code of Conduct, and the libel and slander provisions of the Council's insurance policy. In exercising its communication functions, the Council will have due regard to the Public Sector Equality Duty under section 149 of the Equality Act 2010.

6. PRESS – MEDIA MANAGEMENT

RTC's general policy for dealing with the press/media is as follows: Where practicable any releases to the press or other media are to be approved by the Council. However, where time constraints make this approach impossible, then the Clerk and/or the Chair/Vice Chair are authorised to deal with the press/media on behalf of the Council. Key points to bear in mind for effective management of media relations:

- Seek to respond to journalists within a reasonable time
- Be helpful, polite and positive and where possible avoid saying 'no comment' as this is always viewed as a reason to delve deeper
- Ensure all statements or responses to hostile enquiries are cleared by the Town Clerk, Chair or Vice Chair (in the absence of the Chair)
- Be pro-active, which includes issuing timely and relevant press releases and pre-empting potential stories arising from council agendas/minutes where possible

7. HARBOUR STREET NOTICEBOARD

The Marketing & Communications Officer will manage all posting of notices to the locked notice boards. These will be updated by the Marketing & Communications

Officer to ensure that members of the community who are less active online are kept aware of key information.

The number and location of noticeboards will be kept under review by the Finance & General Purposes Committee with the Marketing & Communications Officer.

8. ONLINE PRESENCE

RTC operates a council owned website – www.ramsgatetown.org and the Clerk can be contacted on – town.clerk@ramsgatetowncouncil.gov.uk. The website provides key information about the Council, Councillors, Meetings, Agendas, Finance, News, Notices, Policies, and Minutes etc. Online content should be objective, balanced, informative and accurate. What is written on the web is permanent. RTC's website will be kept up-to-date primarily by the Marketing & Communications Officer and colleagues. There is no obstacle to Councillors submitting copy/articles for inclusion on the website.

All communications should, where possible, promote the council website and it is important to ensure that links to the website are provided from other key partners, including Thanet District Council (TDC) and Kent County Council (KCC).

Council-controlled online content, including websites and social-media accounts, must be moderated to address unlawful or harmful content, in accordance with the Online Safety Act 2023.

9. PUBLICATIONS

Community Ad Magazine

The Community Ad Magazine is a bi-monthly publication intended to reach people who are not on social media; it will be populated with the content that's been published on Facebook, [via the website or through submissions from community groups](#).

The Newsletter is delivered to an email mailing list. [Hardcopies can be made available upon request](#).

Consultations

Adhoc leaflet/letter drop consultations can take place as required, however, this should only be signed off by the Chair or in some circumstances the full Council (i.e. a Public Works Loan Board (PWLB) application consultation).

10. PUBLISHING OF PHOTOGRAPHS AND PRIVACY ISSUES

It is vital however that where photographs are taken at events, particularly those involving local schools and children, that images are not published without the permission of those featured or their parent(s)/guardian(s). Clearance of such images must be sought, e.g. via the school(s) involved, before they are published. Such clearance can be obtained either by a Councillor direct, or via the Clerk, who should be consulted if in doubt.

Councillors and officers should seek permission before sharing photographs, personal achievements, or other identifiable information about members of staff in council communications or on social media, unless the material has already been approved for publication as part of official council business. This does not prevent the Council

from sharing general information about council services or operational work, such as maintenance activity or litter picking, where individual members of staff are not the focus of the post.

11. EMAIL

RTC councillor emails should be considered to be in the public domain. Councillors should ask themselves before they send anything related to their role on the RTC “Would I be happy if this was posted on the RTC Noticeboard?”

Good Practice and Guidance around Use of Email

Councillors are asked to note the following guidance:

Use of email in discussing Council positions on issues.

A core governance rule for all parish council’s is that decisions should as far as possible be taken in public, including any related debates. Councillors should try to refrain from sending views on topics round to other Councillors (individually or in small groups) before discussion on topics at public meetings to ensure the transparency of the RTC’s decision making process.

Rather than bring up a new issue to all RTC colleagues, Councillors should write to the Clerk (optionally with copy to the Chair) who will then decide how to take it forward. The Clerk will make it clear in emails if a matter is for information only or whether a response is required.

Councillors should refrain from passing comment by email of information-only items as it creates unnecessary email traffic.

Where a response is required from the Clerk, councillors are advised to consider whether it is necessary to copy colleagues into the response as colleagues do not want to have large numbers of unnecessary emails in their inboxes.

Transmission of personal data via email.

Please see the approved “Protocol on Release of Confidential Information” for more information.

Although it happens only infrequently, email correspondence between members may, from time to time, include personal data and even sensitive personal data, which needs to be handled carefully. This can arise, for instance, in employment-related and complaints correspondence and similar.

The key guidance in writing emails in such situation is: Be careful when writing communications that include personal data, both in terms of what is said and how it is said. If in doubt, ask yourself whether you (or the town council) would feel embarrassed about your email being made public.

Where the communication includes sensitive personal data, be extremely careful about who the email is addressed to, and err on the side of minimal circulation.

If in doubt, consult the Clerk.

Council communications form part of the Council's records and will be retained or securely deleted in accordance with the Council's retention schedule.

12. THE USE OF SOCIAL MEDIA PLATFORMS NOT CONTROLLED BY RTC

Councillors must be aware that all statements or opinions expressed by them, via any platform to either open or closed groups of individuals and/or the public at large which differ from the decisions and policies of RTC (regardless of the councillor's individual views on the subject) should be very carefully considered since they could be perceived as coming from RTC.

Councillors' use of social media may constitute official council business and may fall within the scope of the Members' Code of Conduct. Online content must comply with the Seven Principles of Public Life and may give rise to standards complaints, regardless of whether the account is described as personal.

13. RESPONDING TO COMPLAINTS & INCORRECT INFORMATION

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. Members 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. Members and Officers must be prepared to work together to prepare holding statements, other information and carry out research even if no one has contacted the Parish Council about an issue. This matter includes negative and incorrect statements seen on social media; a correct statement will be issued on our social media accounts clarify the matter; the Council will not respond directly to the original post.

Should the media publish or broadcast something inaccurate about the Parish Council, a quick decision needs to be taken on any action necessary to correct it. The issue should be discussed with the Clerk to decide what action is appropriate. This 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 in conjunction with the Chair. Occasionally the 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 Council will learn from the error or put it right.

14. FREEDOM OF INFORMATION AND DATA PROTECTION

Requests for information may fall under the Freedom of Information Act 2000. Statutory response times apply. Once a request is received, relevant records must not be altered, withheld, or destroyed.

Requests for environmental information may also fall under the Environmental Information Regulations 2004, which provide separate rights of access.

This policy is governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. All council communications involving personal data must have a lawful basis, be data-minimised, stored securely, and retained or deleted in accordance with the Council's retention schedule. Complex data protection matters must be referred to the Clerk.

Should the 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. The Data Protection Act 2018 prevents the use of personal information other than for the purposes for which it was supplied.

Councillors and officers should be familiar with the Council's GDPR guidance and the "Protocol on Release of Confidential Information"

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