

Dunkirk Parish Council – Communications Policy

This Communications Policy was amended and adopted by the Council at its Meeting held on 24 June 2019.

GENERAL AIMS

To establish clear, easy to use, channels of communication in relation to members of the public, other agencies, fellow members, the press and parish council staff. The parish council aims to provide information on important matters affecting the community and to encourage informed comment from interested individuals and groups.

Each parish councillor has a duty to represent, without bias, the interests of the whole community. He / she will always try to help with regard to matters relating to the parish. However, an individual councillor cannot respond to enquiries outside of parish council meetings other than to acknowledge such an enquiry. Neither can an individual councillor, nor the Chairman, make a decision or respond on behalf of the parish council.

COMMUNICATION CHANNELS

Website

In accordance with The Smaller Authorities Transparency Code and to provide parishioners with a clear picture of its activities, the parish council will publish information on its website. This information will include:

- Parish council meeting agendas and minutes
- All items of expenditure above £100
- End of year accounts
- Annual governance statement
- Internal audit report
- List of councillors and committee membership
- Detail of public land and assets

Notice boards

The parish council notice boards will display contact details for the parish clerk, the agenda for the next meeting, any statutory notices and other items of interest. Due to limited space, more comprehensive information is available on the parish council website.

Newsletter and local magazine reports

The parish council does not publish a regular newsletter at the moment; however, its news is included in the local magazine. Writing of this material should be by the Chairman or an appointed parish councillor. All copy must be seen by the Chairman before it is published to ensure it is accurate and fairly represents the council. From time to time, the parish council may wish to generate newsletters, the content of which must be approved by the council as a whole.

Meetings

During every parish council meeting there is an opportunity for members of the public to raise a matter of concern or to comment on an item on the agenda. After the conclusion of the public speaking section however, members of the public are not

permitted to contribute to further agenda items unless permission is granted by the Chairman.

Annual meeting of the Parish Council

This meeting will be held in May each year. It is in effect a normal parish council meeting except that the first item on the agenda has to be 'the election of the chairman'.

Annual Parish Meeting

This is a meeting of the parish and not the parish council. Electors can contribute to the agenda and these meetings can celebrate local activities and debate current issues in the community. Seven clear days' notice of the meeting will be given and the meeting must be held between 1 March and 1 June each year.

Correspondence

All correspondence to the parish council should be addressed to the Clerk. This will ensure that the matter is recorded and passed to the parish council for their attention at the next meeting.

If a parishioner wishes a subject to be raised, and it is appropriate for discussion at a parish council meeting, then the Clerk will have to be notified seven days before the publication of the agenda.

The parish council will determine the response, if any, to correspondence received. The parish council reserves the right not to respond to any correspondents that are taking up a disproportionate amount of the Clerk's time. Advice will be sought upon receipt of vexatious communications and acted upon accordingly.

All official correspondence from the parish council should be sent by the Clerk in the name of the parish council. Correspondence from individual parish councillors should be avoided; however, there may be exceptional situations when it is appropriate for a parish councillor to issue correspondence in his / her own name; such correspondence must be authorised by the parish council and copied to the Clerk and Chair.

COMMUNICATION WITH THE PRESS AND PUBLIC

The Clerk will clear all press reports, or comments to the media, in consultation with the Chairman. The Clerk will be the first point of contact for the media; however, where it is appropriate for a councillor to represent the parish council, the Chairman or Vice-Chairman shall be authorised as the official spokesmen for the council.

Individual councillors will not be permitted to issue media releases on behalf of the parish council unless agreed by the whole council on a one-off basis.

In the restricted period before an election, commonly known as 'purdah' media releases will not include quotes from councillors who are due for re-election.

Press reports from the parish council, its committees or working groups shall be sent from the Clerk or via the reporter's own attendance at a meeting.

Unless a parish councillor has been authorised by the council to speak to the media on a particular issue, parish councillors who are asked for comment by the press

should make it clear that it is a personal view and ask that it be clearly reported as their personal view.

Elected members will be regularly approached by members of the community as this is part of their role. How enquiries from the public are dealt with by councillors will reflect on the council. At no time should councillors make any promises to the public about any matter raised with them other than to promise to investigate the matter. All manner of issues may be raised, many of which may not be relevant to the parish council. Depending on the issue raised it may be appropriate to deal with the matter in the following ways:

- Refer the matter to the Clerk who will then deal with it as appropriate
- Request an item on a relevant agenda
- Investigate the matter personally, having sought the guidance of the Clerk

Unless a parish councillor is absolutely certain that he / she is reporting the view of the council, they must make it clear to members of the public that they are expressing a personal view. The only clear way of being aware of the council's view is if the matter has been discussed at a parish council meeting, and a decision made on that item.

INTERNAL COMMUNICATIONS

E-mails should be kept to a minimum and be appropriate to the work of the parish council.

Councillors should use their designated cllr....@dunkirkpc.org.uk email address for all parish council communication.

Matters for information to the other councillors should normally be directed via the Clerk or Chairman. Instant replies should not be expected from the Clerk or Chairman.

Telephone calls should be kept to a minimum and be appropriate to the work of the parish council.

SOCIAL MEDIA

The parish council may at some stage investigate the proactive use of social media, including Facebook and Twitter in order to promote the activities of the council. If it is agreed that these are accepted methods to promote council activities then this policy will be amended accordingly to incorporate this with the same protocols applying as listed under Communications with the Press and Public.

Should the parish council need to be reactive on its current or new social media channels, the same protocols will apply as listed under Communications with the Press and Public.

Personal social media channels must not be used to promote or comment on matters regarding parish council business unless it is made absolutely clear that anything expressed is a personal view and not that of the parish council.

THE LAW

Members should be aware that comments at parish council meetings and in the press and public domain are subject to the law, particularly in the areas of slander

(spoken word) and libel (written word). Please note that social media channels are deemed to be in the public domain.

Basically, a member cannot voice or write anything that would defame another person because they are entitled to his / her reputation and good name. Communication of a matter which is untrue and likely to disparage substantially a person's reputation is, on the face of it, defamation.

Defamation is defined as the publication to another person of an oral or written statement which:

- Exposes a person to hatred, ridicule or contempt; or
- Causes him/her to be shunned or avoided; or
- Has the effect of lowering his/her reputation in the estimation of right-thinking Members of the public generally; or
- Injures him / her in their office, profession or trade.

Also, by defaming a company or organisation can lead to legal action as the people connected to it will be defamed in turn i.e. if comment is made suggesting a company or organisation is acting illegally, then this implies illegal actions by the people connected to it.

There are other areas of the law to bear in mind such as copyright, data protection, official secrets, children, employment, and race relations.

Please note that all written material that we produce that is relevant to parish council business is subject to the Freedom of Information legislation. This means it can be requested by a member of the public and if the request is reasonable then it will be released into the public domain.

GENERAL DATA PROTECTION REGULATIONS 2018 (GDPR)

The parish council holds limited personal data.

Permission to hold personal data (for example email addresses) is gained from parishioners before being used. Any group email communications (for example to advertise parish council events) are sent using "blind" copies in order that the email addresses (personal data) are not disclosed.

The parish council's privacy notice can be viewed on the website.

FREEDOM OF INFORMATION

The Freedom of Information Act 2000 provides public access to information held by public authorities. It does this in two ways:

- Public authorities are obliged to publish certain information about their activities; and
- Members of the public are entitled to request information from public authorities.

There are three ways to obtain the information:

Parish council website

The website holds the type of information which the council routinely publishes e.g. minutes and agendas. The information required may already be included in the publication scheme – so please check the documents on the website first.

Inspect documents held by the Clerk

Certain documents can be viewed by contacting the Clerk, either via the facility on the website or by telephone, or in writing. Some documents require some time to locate, so it may be necessary to make an appointment.

Individual written request

If the information is not included in the publication scheme or on the website, then send a written request to:

Clerk – Miss Lizzie Talbot, c/o Dunkirk Village Hall, London Road, Dunkirk, Faversham ME13 9LF. Or email to clerk@dunkirkpc.org.uk.

The request must include your name, address for correspondence, and a description of the information you require.

Council's response to a written request

Within 20 working days of receipt of a written request the parish council will:

- Confirm whether or not it holds the information
- Advise if a fee will be charged
- Provide the information (after any relevant fee has been paid) unless an exemption applies (see 'Exemptions' paragraph).

Fees

The Act only allows the council to charge for answering Freedom of Information requests in the following circumstances:

- Disbursement costs such as printing, photocopying and postage; and
- When estimated staff costs involved in locating and or compiling the information exceed £450. Under these circumstances, the council can refuse the request on the grounds of cost, or charge the applicant £20 per hour, plus disbursements for the estimated work

For the majority of requests, or a series of requests from the same applicant within a 12-month period, it is expected that the charge for locating and compiling information will be less than £450 and therefore, except for disbursement costs, no reimbursement can be sought. However, where costs are estimated to exceed £450 (based on an hourly charge-out rate of £20), the council can decide to:

- Refuse the request; or
- Comply with the request and charge for allowable costs as prescribed in the regulations; or
- Comply with the request free of charge

If the estimated cost of a request is more than £450, and it is decided to release the information and make a charge for the information then a fee notice will be sent to the applicant requesting the appropriate fee. The request will not be answered until the fee has been received.

If the actual cost of completing the request is more than the estimate, then the council will incur the additional cost. Where the cost is less than the estimated cost then the difference will be refunded to the applicant.

For disbursements costs, it is proposed that the council will charge 10p per sheet for photocopying and printing documents, and recover the actual cost of postage or any other transmission costs from the applicant.

Exemptions

Some information may not be provided by the council as there are 23 exemptions in the Freedom of Information Act, for example, personal data about individuals which is protected by the Data Protection Act 1998, or commercially confidential information.
Further Help

For access to information from the council under the Freedom of Information Act, please contact the Parish Clerk (address as before).

More detailed guidance can be found on the website of the Information Commissioner.

Complaints

If you are dissatisfied with the response from the council then you should put your complaint in writing to the Clerk at the address above. If you are still dissatisfied, you may contact the Information Commissioner at:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 01625 545700 Email: mail@ico.gov.uk

Signed:
Name:
Position: Chairman
Date Approved: