

Communications Protocol

| Section | Title | Page |
|----------------|---------------------------------|-------------|
| 1 | The Aims of the Protocol | 40 |
| 2 | Media Comments – Who Talks? | 40 |
| 3 | Media Releases | 45 |
| 4 | Crisis Communication | 46 |
| 5 | Communications Team Core Duties | 46 |
| 6 | Publications | 47 |

1 The aim of the protocol

- 1.1. An effective communications strategy is essential to ensure that the public understands the work of the Council. It exists to protect the reputation of the Council, to promote its key service campaigns and, on occasion, to defend the Council from inaccurate media (broadcast, print and online news websites) reports.
- 1.2. Good media relations are essential to protecting reputation. While the communications team exists to broker and manage media activity, Officers and Councillors will be called on to help and explain the Council's activities. This protocol sets out some of the key ways this is done.
- 1.3. The Council will work in partnership with the media and always be open, honest and proactive in dealings with them. The Council will also respond quickly to their enquiries and give them access to individuals wherever appropriate.

2 Media comment – who talks?

- 2.1. When responding to media enquiries or requests for interviews, the emphasis is on a quick response and accurate, comprehensive information. Media need responses within hours and the growing prevalence of social media platforms is only intensifying this trend.
- 2.2. Stories will run with or without the Council's comments. It is therefore preferable that the Council comments as soon as possible. The ability to turn around requests for comments/interviews swiftly is more likely to result in the Council being approached for positive publicity purposes by journalists in the future.
- 2.3. All requests for comments or interviews must be directed through the Communications Team.
- 2.4. Appropriate spokesperson
 - a) Councillors
 - i) Councillors are the public representatives of the Council and have a particular role in commenting on policy decisions. The Communications Team will approach for comment those Councillors with a designated remit (usually relevant Portfolio Holders or the Leader). On rare occasions Ward Councillors may be approached on a specific Ward related issue.
 - ii) The Communications Team will endeavour to ensure that Councillors are approached in the first instance to provide comment on policy within the deadline. However, if a Councillor quote cannot be obtained by the deadline an Officer quote which focuses on factual operational issues can be used. The

other alternative is to use the “Council spokesperson” attribution, although this should be regarded a last resort.

- iii) Councillors are entitled to comment to the press on an individual basis if they are approached, but should ideally let the Communications Team know that an approach has been made.
- iv) In instances where a Councillor asks the Communications Team to draft a quote on their behalf, the Communications Team will clear any quotes with either the appropriate Director and Chief Executive before sending to the Councillor.

b) Officers

- i) Officers may respond to the media only at the request of the Communications Team acting on behalf of the Chief Executive. The Communications Team will identify the most appropriate Officer to comment.
- ii) Officers will comment on operational issues only and their comments will usually be restricted to factual information. They must not comment on the appropriateness of policy decisions.
- iii) Officers may only offer personal opinions where the issue is non contentious and does not challenge policy. In the exceptional situation that an Officer has to make a comment on a contentious issue, this must be attributed to, and signed off by, the Chief Executive.

2.5. Beating the deadline

- a) Responses must be provided to a journalist within one working day and every effort should be made to meet deadlines. Given the 24/7 news cycle, weekends fit the same pattern.
- b) The Communications Team will make every effort to ensure that Councillors are offered the opportunity to comment on policy issues as set out in paragraph 2.4 above.
- c) The Communications Team will proactively chase responses from individuals at regular intervals. Councillors and Officers are requested to appreciate that this is necessary due to the short timescales and the risk to the organisation of a poor/non response. In some cases it may be appropriate to organise a press briefing to convey information to a large group of people in a short space of time. The Communications Team can advise on when such a briefing is appropriate.

- d) Officers must not give any comment that could be interpreted as expressing or encouraging support for a political party.
- e) The Communications Team will not provide media comments that could be interpreted as encouraging support for a particular party. Councillors should not seek the advice of the Communications Team in responding to political matters or ask for work to be carried out that compromise the political neutrality of the Communications Team. If in doubt, advice must be sought from the Monitoring Officer.

2.6. Purdah

- a) Purdah is the name given to the period that runs from the calling of an election until the close of voting on ballot day. It imposes restrictions on communications activity by local authorities to avoid any accidental risk that it might appear to favour a particular candidate or party.
- b) Following notice of publication of an election, all Council comments will be provided by Officers and will be restricted to factual information. If a political leadership comment is unavoidable (e.g. a civil emergency), representatives of all relevant parties should be invited to comment.
- c) The latest version (31 March 2011) of the DCLG's Code of Recommended Practice on Local Authority Publicity states: "Local authorities should pay particular regard to the legislation governing publicity during the period of heightened sensitivity before elections and referendums" .
- d) It adds: "During the period between the notice of an election and the election itself, local authorities should not publish any publicity on controversial issues or report views or proposals in such a way that identifies them with any individual Councillors or groups of Councillors. Publicity relating to individuals involved directly in the election should not be published by local authorities during this period unless expressly authorised by or under statute."
- e) This does not mean that Council communications activity halts completely. Long-planned events or launches can still go ahead, however, extra care should be given to any release or communications work before it is issued. If in doubt Officers, Councillors and the Communications Team should refer to the Monitoring Officer for guidance.

2.7. Legal action, data protection and confidentiality

- a) Under no circumstance should a "no comment" be issued. However there will be certain circumstances when comment may be difficult such as:

- i) Pending legal action;
 - ii) Pending insurance claims;
 - iii) Personal circumstances of a complainant (e.g. mental health issues);
 - iv) Divulgence of information may put individuals at risk;
 - v) Pending complaints to regulators/arbitrators; and
 - vi) Data protection issues.
- b) These situations do not justify “no comment”. A suitable short statement may express reasons why a detailed response is not possible at this stage. Alternatively, a statement may be made in more general terms avoiding the specific issue.
- c) Staff information
- i) Staff information must not be divulged to the media without the consent of the person concerned. If staff are appearing in photo calls they must be made aware that the picture may feature in local/national newspapers and on websites . The safety of Council Officers is paramount in dealings with the public and media.
- d) Social Media
- i) The Council has an official presence on social media platforms like Facebook, YouTube and Twitter. As well as the principal Council account, there are “sub brands” of the Council including Harlow Playhouse, Pets’ Corner, Parndon Wood nature reserve and the Town Centre Partnership.
 - ii) Material published on them represents the official voice of the Council and no posting should be made without the approval of a Director or the Communications Team.
 - iii) No team may create an individual presence on a social media website without making a business case to be approved by SMB/Directors. It must clearly demonstrate why the team needs an individual identity online.
 - iv) The Communications Team will decide in what circumstances the Council responds to two-way communication or comments on the Council’s work via social media or the web. In no circumstances should employees contribute to these

discussions in a way that gives the impression they are the official 'voice' of the Council.

- v) Many employees will have personal listings on Facebook, Twitter, Linked In and similar sites. Staff should be mindful that any discussion of the Council may breach confidentiality and could also, depending on tone, bring the Council into disrepute. Unauthorised use of the internet or social media by staff, even in their own time, brings with it the risk of disciplinary action, or in the most severe cases, dismissal.
 - vi) There is however clearly an exemption to be made where a member of staff has a legitimate dual role within the Council – for example as an elected trade union official – and so may express reasonable views contrary to Council policy in that context, for example on a trade union website or blog.
 - vii) Social media platforms are a form of global broadcast, despite their often friendly and confessional environment. Do not say anything online about your work or the Council that you would not be prepared to say to a radio interviewer.
 - viii) Access to social media sites is only allowed to Council employees who can clearly demonstrate a work purpose for using them. If in doubt, refer to your line manager.
- e) Reacting to comment on social media/websites
- i) There are a number of Facebook sites that are critical of the Council plus a number of ad hoc blogs set up by individuals. There are also sites operated by the local newspapers that invite comment about on-line articles.
 - ii) The Council will:
 - interact selectively with such sites. There is usually little merit engaging with pressure groups or single issue sites/blogs but each case will be assessed on its merits by the Communications Team which constantly monitors social networking activity.
 - respond to comments on a newspaper site in response to inaccuracies. Councillors will sometimes respond in a personal capacity. Again, each issue needs to be taken on its merits and the usual clearance procedure followed. The Communications Team will initiate such responses.
 - ensure Officers clear any responses to issues on third party social media area with the Communications Team.

Officers cannot respond in a professional capacity to comments on any site without clearance.

- ensure Officers are mindful that emails or correspondence sent to third parties externally may be used on social networking.

3 Media releases

3.1. The Communications Team will draft all Council news releases and will work corporately and with individual services. Wherever possible, the release should support the Communication Team's campaign activities for the year. These are set out in the communications work plan, which is available from the Communications Team.

a) Presentation and timeliness

- i) Where a release is tied to a Committee meeting, it should be prepared in advance assuming acceptance of the recommendations. These releases must not be issued until after the meeting and clearance by relevant individuals.

b) Councillor involvement

- i) In most cases the Portfolio Holder will be quoted in the release, especially where it concerns policy decision. In some instances, of conveying basic operational information, an Officer may be quoted. The Communications Team will usually prepare quotes for the release for approval by relevant Councillors.

c) Clearances

- i) Media releases should be checked for factual accuracy in the first instance by the operational Officer.
- ii) The release will then be circulated for comment to the relevant Director and the Chief Executive.

3.2. Circulation

- a) Releases should be copied by email to Directors/all relevant Councillors by email prior to being issued. They should then be posted on the Council's website/intranet as soon as possible. Relevant press releases will also be circulated soon after issuing to the Council's partner organisations so they are aware of any key local issues.

4 Crisis communications/difficult issues

4.1. Alerting the Communications Team

- a) If the Communications Team is aware in advance of a difficult issue, it can be managed in a timely and co-ordinated way through press statements, interviews or press briefings. Information can be prepared which explains the situations in a way to which the public can relate and create better understanding of difficult situations.
- b) The Communications Team will work closely with lead Councillors and the relevant senior Officers to ensure that they are kept informed of the situation and sign off any responses.
- c) A quick response to difficult issues is mandatory and for the most sensitive situations a full crisis management plan is required.
- d) There will be times when Council staff are made aware in advance of negative stories. This will be communicated to staff using one of the Council's internal communications channels. This is important in maintaining good relations with staff and to avoid staff reading or hearing about Council issues first hand from the media.

4.2. Right of reply

- a) On occasions, there will be articles/broadcast items that the Council does not feel reflect its position accurately. The Council aims to make every effort to correct inaccuracies.
- b) Formal complaints should be restricted to inaccurate items only and not because the Council simply does not agree with the "angle" of the article. If it is felt that the angle of the article does not present a fair picture, other measures can be used such as requesting follow up press interviews for lead Councillors.
- c) There are formal forms of redress such as a complaint to the editor or to the Press Complaints Commission. The Communications Team can advise on formal redress if necessary.
- d) Care should also be taken over responding to letters in the press. A balance needs to be achieved between rebutting negative issues and protracting an issue. The Communications Team will not routinely draft response letters but can advise on content and courses of action.

5 Communication Team Core Duties

5.1. Daily Issues

- a) The Communication Team produces a list of key media/marketing/internal communications tasks by 9.30am every day. This is sent to senior managers. The daily issues list reflects the Council's main campaigns but should also reflect the Council's response to relevant news stories of the day.

5.2. Media summary

- a) The Communications Team issues a media summary by 9.30am which is a digest of news stories relevant to local authorities. It covers print, radio and new media and also includes a regional section relevant to Harlow/Essex.

5.3. Harlow in the News

- a) Every Friday, the Communications Team produces a summary of the Council's references in the media for the week. It records the item and whether the coverage of the Council is positive or negative in tone. Media is 'scored' according to tone and a monthly tally is collated.

6 Publications

- 6.1. Harlow Times is the Council's main public publication and is published quarterly. It is designed to explain the work of the administration and to be factual and readable to a lay audience.
- 6.2. The Council's magazine is not a substitute for local newspapers and does not work in competition with them. Its role is to explain how the Council is fulfilling its role. It may cover topics in which the media has no interest or does not have the time/space to report.
- 6.3. The Government's view on Council publications has changed significantly since the election of the Coalition Government in 2010 and this is reflected in the revised code of practice for local government publicity, first issued by the DCLG on February 11, 2011.
- 6.4. Many of the changes were aimed at ensuring that Council magazines or newspapers does not threaten the viability of independent local media, either through publishing too frequently (i.e. weekly) or by distorting the advertising market by channelling money away from local newspapers.
- 6.5. While Harlow Times does not infringe the new recommendations on the regularity of Council publications, there are other more general provisions to be aware of. The revised code states that advertising must not be sought as a form of subsidy, should be clearly identified within the magazine as being advertising and should not be used in any publication owned or controlled by a political party. Advertising in Harlow Times has historically been limited to one or two display adverts and a page of free listings for local businesses. However, given the sensitivities around the

cost of local authority publications, this is an issue which should be kept under review.

- 6.6. The Council also produces a Weekly Information Bulletin for staff and Councillors which is used to keep everyone informed about both internal and external events. It is currently published every Friday. Items for the Bulletin need to be with the communications team by close of play Wednesday.
- 6.7. Full details of the code can be seen at <http://www.communities.gov.uk/publications/localgovernment/publicitycode2011>