



# Barrowby Parish Council

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## Social Media Policy

### Document control

- **Owner:** Full Council
- **Responsible officer:** Clerk / Proper Officer
- **Adopted:** 11.05.2026 (Minute ref: 8e [26/008])
- **Version:** 2025.1
- **Review:** Annually or earlier if legislation/guidance changes
- **Next review due:** January-March 2027 at Full Council for formal adoption at Parish Council May 2027

### 1. Purpose

This policy sets out how Barrowby Parish Council will use social media, messaging platforms and other digital communication channels in a lawful, professional and responsible manner.

The policy is intended to:

- support effective communication with residents and stakeholders;
- protect the Council's reputation;
- promote respectful and lawful online behaviour;
- ensure compliance with data protection, freedom of information, records management and related legal duties; and
- clarify when messages sent by WhatsApp, text message or similar platforms become Council records.

The policy applies alongside the Council's Code of Conduct, IT and Cyber Security Policy, Data Protection Policy, Privacy Notices, Retention Schedule and any relevant complaints, dignity at work or staff conduct procedures. ICO guidance expects public authorities to manage records properly and be able to locate and retrieve them, whatever channel they are created in.

### 2. Scope

This policy applies to:

- all councillors;
- employees;
- volunteers acting on behalf of the Council;

- contractors or others authorised to post or communicate on behalf of the Council.

It covers:

- official Council social media accounts;
- social media content published in the Council's name;
- private or personal accounts when used for Council business;
- messaging platforms such as WhatsApp, SMS/text, Messenger and similar services when used for Council business;
- comments, direct messages, posts, images, video and shared links;
- digital communications used for engagement, administration or service delivery.

### 3. Principles

The Council will use digital communication channels in line with the following principles:

- **Lawful and respectful** – communications must comply with the law and be respectful, accurate and appropriate.
- **Transparent** – official Council communications should be identifiable as such.
- **Accountable** – users remain personally responsible for what they publish or send.
- **Proportionate** – channels should be used appropriately for their purpose and not as a substitute for formal decision-making.
- **Secure** – personal data and confidential information must be protected.
- **Properly recorded** – important Council business communicated by social media or messaging must be captured where it amounts to a Council record.

These principles reflect ICO records-management expectations for public authorities and wider local government guidance for councillors using social media.

### 4. Official Council accounts

The Council may operate official social media accounts for information sharing, engagement and promotion of Council services, events and notices.

Official accounts:

- remain the property of the Council;
- must be created, administered and, where possible, recoverable through Council-controlled contact details and access arrangements;
- must only be used by authorised persons;
- must be managed securely, including strong passwords and multi-factor authentication where available;
- must not be used for party-political campaigning.

The Clerk / Proper Officer will maintain or oversee a record of official accounts, administrators and recovery details.

## **5. Acceptable use of official channels**

Official Council social media channels may be used for:

- public notices and meeting information;
- service updates;
- community information and events;
- signposting to Council decisions, consultations or external services;
- emergency or urgent public information where appropriate;
- engagement that supports the Council's functions.

Official channels must not be used for:

- unlawful, defamatory, abusive, discriminatory or harassing content;
- personal disputes;
- confidential staffing matters;
- publishing personal data unless there is a lawful basis and it is appropriate to do so;
- pre-determining quasi-judicial matters, including planning or licensing decisions;
- making or announcing decisions that have not been lawfully taken through proper Council processes.

For councillors, LGA guidance stresses that social media can support healthy engagement, but users should think carefully before posting and remain aware of their responsibilities and public role.

## **6. Standards of conduct**

Anyone posting or communicating on behalf of the Council must:

- be accurate and clear;
- be polite and professional;
- distinguish fact from opinion;
- correct significant errors promptly;
- avoid inflammatory, sarcastic or confrontational exchanges;
- avoid posting when angry or upset;
- comply with confidentiality, copyright, data protection and equalities obligations.

Users must not:

- disclose confidential or exempt information;
- publish personal data without a lawful basis;
- engage in bullying, harassment or intimidation;

- share content that could bring the Council into disrepute;
- present personal political views as the position of the Council.

## **7. Personal accounts and councillors' own social media use**

Councillors and staff may maintain personal social media accounts in a private capacity. However, when referring to Council business, they must take care not to imply they are speaking on behalf of the Council unless authorised.

Where councillors comment on Council matters from a personal account, they should make clear, where appropriate, whether they are expressing a personal view or an authorised Council position.

Personal accounts must not be used to:

- disclose confidential Council information;
- conduct formal Council business in an unmanaged way;
- harass or target residents, councillors, staff or contractors;
- undermine lawful Council decisions or processes through misuse of privileged information.

Councillors should remain mindful of the Code of Conduct and of the public nature of online communication. LGA guidance for councillors highlights the importance of staying safe, engaging constructively and thinking carefully about role and audience when publishing online.

## **8. Moderation and public interaction**

The Council may moderate comments on its official channels where this is lawful, proportionate and consistent with the purpose of the page.

The Council may hide, remove or report content that is:

- abusive, threatening, hateful or discriminatory;
- obscene or indecent;
- defamatory;
- repetitive spam;
- misleading in a way that risks harm;
- unlawful;
- a breach of privacy or confidentiality.

The Council may also block users where necessary to protect staff, councillors, other users or the integrity of the page, but any such action should be proportionate and recorded where appropriate.

Where possible, the Council should avoid debating complex complaints or personal cases in public comments and should direct individuals to a more appropriate formal route.

## 9. Personal data, privacy and direct messages

Social media and messaging platforms must not be used to process personal data or special category data unless there is a clear lawful basis, the use is appropriate, and reasonable safeguards are in place. ICO guidance makes clear that information sharing requires a lawful basis and should be managed carefully.

Users must not:

- request or encourage residents to post personal details publicly where not necessary;
- discuss staffing, complaints, safeguarding, health or other sensitive matters in public comments;
- retain screenshots, direct messages or personal details longer than necessary;
- move sensitive casework into insecure channels without good reason.

Where a resident sends personal information by direct message, the Council should move the matter to a more appropriate and secure channel where practicable.

The Council must also take care not to use email, text or messaging in a way that amounts to unlawful direct marketing. ICO guidance on electronic mail marketing under PECR sets specific rules for marketing emails and texts.

## 10. Clear rule on WhatsApp, text messages and other messaging apps

### 10.1 General rule

WhatsApp, SMS/text messages, Messenger and similar platforms may be used for limited and practical Council communications, such as:

- arranging meeting times;
- alerting members to urgent administrative matters;
- sharing public links or documents already available through approved channels;
- notifying councillors or staff of operational issues.

They must not be used as a substitute for formal decision-making, formal records storage, or confidential case handling unless specifically authorised and appropriate safeguards are in place.

### 10.2 When messages become Council records

A WhatsApp message, text message or similar digital message becomes a **Council record** when it contains or evidences Council business of substance, including for example:

- a decision, instruction, approval or authorisation;
- substantive discussion relevant to Council functions;
- information relied upon in reaching a decision or taking action;

- communications about contracts, finance, staffing, complaints, FOI/EIR, legal matters, data protection or other statutory functions;
- evidence of how the Council responded to an issue, event or incident;
- information that may be needed for audit, accountability, complaint handling, investigation or business continuity.

Whether information is held for FOI purposes depends on its content and context, not simply on whether it sits in an official account. The ICO specifically states that information in non-corporate channels may still be official information if it relates to the public authority's business.

### **10.3 What must happen if a message becomes a Council record**

Where a message becomes a Council record, the sender or recipient must ensure that it is captured into the Council's official record system as soon as reasonably practicable. This may be done by:

- forwarding the message to the Clerk / Proper Officer;
- taking a screenshot and saving it in the appropriate Council file;
- copying the content into a formal note, email or minute where appropriate;
- exporting the relevant message thread and saving it securely.

Council records must not remain solely in private phones or personal messaging apps.

### **10.4 Transitory messages**

Purely administrative and short-lived messages that do not contain substantive Council business, such as "Running 10 minutes late" or "Please see agenda link", do not normally need to be retained as Council records unless they form part of a wider issue, dispute, incident or evidential trail.

### **10.5 Group chats**

Council-related WhatsApp or messaging groups must not be used:

- to make decisions outside properly convened meetings;
- to seek consensus in a way that bypasses lawful governance;
- to share confidential or sensitive information unless clearly authorised and secure;
- to conduct staffing, complaint or legally sensitive discussions informally.

Where a Council-related group chat includes substantive Council business, relevant messages must be captured as records.

This approach is consistent with ICO records-management expectations and with the principle that public authorities must be able to locate and retrieve official information across communication channels.

**Simple rule:**

If a WhatsApp or text message is merely administrative, it will not normally need to be kept. If it records a decision, advice, instruction, substantive discussion, or anything the Council may later need to evidence, explain, disclose or rely on, it should be treated as a Council record and copied into the Council's official record system.

**11. Meetings, decisions and predetermination**

Social media and messaging platforms must not be used to:

- make formal Council decisions outside lawful meeting arrangements;
- create the appearance that decisions have already been made;
- coordinate improper collective decision-making outside meetings;
- prejudice the Council's handling of planning, complaints, procurement, staffing or other sensitive matters.

Particular care should be taken in relation to planning and other quasi-judicial matters. Councillors must not post in a way that suggests predetermination or bias.

**12. Records retention and capture**

The Council will manage social media and messaging records in line with its Retention Schedule and records-management arrangements.

The Clerk / Proper Officer will ensure that, so far as reasonably practicable:

- important social media posts and messaging records are captured where they amount to Council records;
- records can be located and retrieved when needed;
- duplicate or trivial material is not kept longer than necessary;
- official records are not left indefinitely in unmanaged platforms.

ICO records-management guidance expects public authorities to have arrangements for the creation, keeping, retrieval and disposal of records.

**13. Security**

Access to official accounts and Council-managed messaging channels must be secured appropriately.

Where possible, the Council will use:

- strong unique passwords;
- multi-factor authentication;
- limited administrator access;
- up-to-date devices and apps;
- prompt removal of access when roles change.

Compromised accounts, suspicious messages, impersonation attempts or accidental disclosures must be reported immediately under the Council's IT / Cyber Security Incident Report Procedure and, where relevant, its Personal Data Breach Procedure.

#### **14. Training and awareness**

Councillors and staff using social media or messaging for Council purposes should receive proportionate guidance or training covering:

- professional standards and conduct;
- handling criticism and abuse;
- records and retention;
- data protection and confidentiality;
- safe use of messaging apps;
- predetermination and reputational risk.

LGA guidance provides practical support to councillors on using social media effectively and safely.

#### **15. Breach of this policy**

Breach of this policy may lead to:

- removal of posting or administrator access;
- internal action under the Council's relevant procedures;
- referral under the Code of Conduct process, where applicable;
- referral to the police, ICO or another authority where appropriate;
- contractual action in the case of contractors or external service providers.

#### **16. Related policies and documents**

This policy should be read alongside:

- Code of Conduct;
- IT, Email and Cyber Security Policy;
- Data Protection Policy;
- Privacy Notices;
- Records Retention / Document Retention Schedule;
- Personal Data Breach Procedure;
- IT / Cyber Security Incident Report Procedure;
- Complaints Policy;
- Dignity at Work / Bullying and Harassment Policy;
- Media / Communications Protocol, if adopted.

#### **17. Policy review**

This policy will be reviewed at least annually, and sooner if required by:

- legislative or regulatory change;
- updated ICO or other official guidance;
- changes to Council communication channels; or
- incidents, complaints or identified weaknesses in practice.