NARBERTH TOWN COUNCIL
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POL

Social Media and Electronic Communication Policy

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Revised 6 October 2026: WhatsApp group status clarified. Proposed wording remains subject to Council adoption.
Based on SLCC MD193 Social Media and Electronic Communication Policy, February 2025. © SLCC 2025. Localised for Narberth Town Council, updated for Welsh requirements and consolidated with local provisions LP1–LP3. SLCC copyright remains with SLCC; use and adaptation are for the member council.

1. Introduction

1.1 Digital and social media and electronic communication help the Town Council communicate within the Council and with the people, businesses and agencies it works with and serves.

1.2 The Council's confirmed public channels are its website, Facebook page and Instagram account. It also uses Council email accounts. Councillors use an informal WhatsApp group, whose status and use are addressed in section 6. This Policy applies to any additional Council channel adopted in future and will be reviewed when the Council's arrangements change materially.

1.3 The Council's website, Facebook page and Instagram account provide information and updates about Council activities and opportunities within Narberth and promote the community positively.

2. Standards for Council Communications

2.1 Communications from the Council will:

- be civil, accurate, accessible, relevant and, where appropriate, available in Welsh and English in accordance with the Council's Welsh language arrangements;
- be objective and comply with the Code of Recommended Practice on Local Authority Publicity;
- not contain content that is knowingly unlawful, defamatory, harassing, abusive, threatening, harmful, obscene, discriminatory or otherwise inappropriate;
- not reproduce material without permission or another lawful basis;
- include personal information only where it is lawful, necessary and proportionate to do so;
- be published or moderated only by an authorised person;
- not use Council resources for party-political advertising or publicity.

3. Public Interaction on Council Channels

3.1 To keep discussion on Council channels productive, respectful and consistent with the Council's aims, users should:

- be considerate and respectful; vulgarity, threats and abusive language will not be tolerated;
- discuss differing opinions without personal attacks on members of the public, Councillors or staff;
- share official Council posts responsibly, observe copyright, be accurate and credit sources where appropriate;
- stay on topic;
- not use Council channels for commercial promotion, spam or selling products unless expressly authorised by the Council.

3.2 The website and social media channels are not monitored continuously. The Council may not reply individually to every message or comment, but relevant themes and helpful suggestions may be passed to the appropriate person or authority. Personal or private information should not be posted publicly.

3.3 A social media message or post is not formal contact with the Council. Official enquiries, information requests and complaints should be sent to the Clerk at clerk@narberthtowncouncil.gov.wales.

3.4 The Council may hide, remove or report content, and may restrict or block repeat offenders, where content is obscene, discriminatory, threatening, abusive, defamatory, unlawful, off topic, spam, commercial promotion, a copyright infringement, or contains private personal information without a lawful basis.

3.5 Moderation decisions will be proportionate and will not be used to suppress lawful criticism. A person alleging misconduct, a policy breach or criminal conduct may be directed to the Council's complaints arrangements, the Public Services Ombudsman for Wales, the Police or another appropriate body.

4. Town Council Website

4.1 The Council may direct people to information on its website or forward a question to a Councillor, officer or other authority for consideration. The Council may not respond to every comment, particularly during periods of heavy workload.

4.2 The Council may allow an approved local group to maintain clearly identified content on the website. The group is responsible for keeping that content accurate and compliant with the Council's rules. The Council may remove content that does not meet those rules, and the page must make clear where the content is not the direct responsibility of the Council.

4.3 The website will include, so far as required or reasonably practicable under Welsh law and the Council's publication arrangements:

- Council contact details and information about Councillors;
- meeting dates, notices, access arrangements, agendas, supporting papers, decisions and minutes, subject to lawful confidentiality restrictions;
- the register of members' interests and other statutory governance information;
- audited statements of account and other financial and audit information required by Welsh law or the Council's publication scheme;
- policies, procedures and public notices;
- links to relevant public bodies, including Pembrokeshire County Council;
- information about local clubs, societies, organisations, events and Council news where publication is authorised.

4.4 Statutory publications and Council publicity will follow applicable Welsh language, accessibility and alternative-format arrangements. Social media may draw attention to a notice or meeting paper, but it does not replace publication on the Council's website where electronic publication is legally required.

4.5 The website will not include party-political publicity, unauthorised commercial advertisements or unauthorised fundraising publicity.

5. Town Council Email

5.1 The Clerk's Council email address is clerk@narberthtowncouncil.gov.wales. It is monitored mainly during office hours, 10:30–16:30, Monday to Friday. The Council aims to reply as soon as reasonably practicable, and an out-of-office message will be used when appropriate.

5.2 The Clerk is responsible for dealing with email received and for passing relevant correspondence to Councillors or external agencies where there is a lawful and necessary reason to do so. Official Council communications will usually come from the Clerk; otherwise the Clerk must be copied where the communication concerns Council business.

5.3 Before personal data is shared, the Council will identify an appropriate lawful basis, share only the minimum information necessary, and provide relevant privacy information. Consent will be sought only where consent is the appropriate lawful basis; a blanket data-consent form is not required for every referral or disclosure.

5.4 Councillors are provided with Council-owned email addresses and may communicate directly with residents about Council business. They must distinguish personal views from agreed Council positions and copy the Clerk where an official record or action is required.

5.5 Emails held for Council business may form part of the official record and may be disclosable under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, subject to applicable exemptions and data-protection requirements. Records must be retained and disposed of in accordance with the Council's arrangements.

5.6 Personal information must not be disclosed outside the Council unless the disclosure is lawful, necessary, proportionate and limited to what is required. Confidential information must be protected and shared only with people who have a legitimate need to know.

5.7 Emails may be sent outside office hours, including at weekends. There is no expectation that recipients will read, acknowledge or respond to routine communications outside 10:30–16:30, Monday to Friday, excluding bank holidays, and they must not be pressured to do so. These arrangements do not alter separately agreed staff working arrangements.

5.8 Members are encouraged to use Outlook's scheduled sending feature to send routine emails during office hours. Outlook mobile also offers quiet-time settings to silence email notifications outside chosen hours, although emails will continue to arrive in the mailbox. Members wishing to set up these features should contact the Clerk, who can assist with the settings available on their device.

6. Text Messages and WhatsApp

Councillors currently use an informal WhatsApp group. This group is not an official Council communication channel, and adoption of this Policy does not confer that status upon it. The following provisions govern messages concerning Council business exchanged through that group or other informal messaging arrangements.

The Right to Switch Off

6.1 The immediacy of WhatsApp notifications can create pressure to engage, even where no response is expressly requested.

6.2 Councillors use personal mobile numbers for WhatsApp messages concerning Council business, so messages can intrude directly into their personal and family time. Through this Policy, the Council supports Councillors' and staff members' right to switch off from routine Council communications. Respecting that boundary promotes a healthy work-life balance and recognises members' employment, caring and other personal commitments. Responsibility rests with those sending messages to respect these boundaries, rather than relying on recipients to silence their phones.

6.3 Notifications can be particularly intrusive for people whose hearing aids or other assistive devices are connected to their phones, as alerts may be transmitted directly through those devices. This can cause unwanted distraction and distress, especially outside office hours. Respecting the right to switch off supports accessibility and wellbeing as well as personal privacy. Members must not assume that recipients can simply silence or disconnect their phones without affecting personal communications or the use of assistive technology.

WhatsApp Hours and Permitted Use

6.4 The informal WhatsApp group used by councillors may be used for brief factual updates, practical reminders and urgent operational information. Routine messages must be sent only between 10:30 and 16:30, Monday to Friday, excluding bank holidays. Practical meeting reminders must not replace formal meeting notices.

6.5 Outside those hours, messages must be limited to urgent matters requiring attention before the next working day, such as an immediate risk to public safety. This exception does not create an expectation that members or staff will monitor WhatsApp or be available on call.

6.6 WhatsApp must not be used to make Council decisions, commit expenditure, commission work or agree a course of action requiring Council approval or delegated authority. Matters requiring action must be referred to the Clerk through the appropriate Council process.

6.7 Texts and informal WhatsApp groups must not be used for:

- day-to-day discussion of, and views on, Council policies and their implementation;
- evidence of agreement or disagreement, or as an alternative to voting;
- agreement of a specific course of action or financial commitment by the Council;
- formal reports or feedback in place of the required Council reporting process; brief factual updates permitted above do not replace that process;
- proposing agenda items, sharing meeting papers or notifying apologies in advance.

6.8 Councillors and the Clerk may use SMS as a convenient way to communicate at times. This Policy also applies to such messages. These arrangements govern routine communications and do not alter scheduled Council meetings or separately agreed staff working arrangements.

7. Video Conferencing and Multi-location Meetings

7.1 This Policy applies when video conferencing is used for Council communication.

7.2 Formal Council meetings may be held from multiple locations only in accordance with the Council's Standing Orders, its published meeting arrangements and the requirements applying to community and town councils in Wales. Meeting notices must state how the public can access the meeting, and formal papers must be published electronically where required.

8. Recording of Meetings

8.1 Where the Council records a meeting for minute-taking or another authorised purpose, the meeting notice will explain the arrangement. Recordings will be stored securely, accessed only by authorised persons and retained only for as long as required. Unless a longer lawful retention period applies, a minute-taking recording will normally be deleted after the minutes have been formally approved.

8.2 Requests by members of the public or press to film, photograph or record a meeting will be handled in accordance with applicable law, the Council's Standing Orders and any reasonable arrangements needed to protect confidential business, personal data and the orderly conduct of the meeting.

9. Internal Communication and Access to Information

9.1 The Council will continue to improve its working arrangements. Social media and electronic communication are important tools, but they do not replace lawful decision-making, formal records or the authority of the Council as a corporate body.

9.2 Councillors must comply with the Members' Code of Conduct, the UK General Data Protection Regulation and the Data Protection Act 2018 in all work undertaken on behalf of the Council.

9.3 Information must be treated sensitively and securely. Confidential information must not be disclosed without lawful authority, and access should be limited to those with a legitimate need to know. A failure to protect confidential information may breach the Code of Conduct, data-protection law or other legal duties.

9.4 Only essential recipients should be copied into emails. Reply All should be used only where every recipient needs the response, and unnecessary email trails or personal data should be removed before forwarding.

9.5 Councillors are personally responsible for content they create, publish or share. When a Councillor acts, claims to act or gives the impression of acting in their official capacity, the Members' Code of Conduct applies. Some Code provisions may also apply to conduct in a personal capacity, including conduct capable of bringing the office of Councillor or the Council into disrepute.

9.6 When using social media, Councillors should remember that:

- they are elected representatives and should distinguish personal views from agreed Council positions;
- posts can affect the reputation of the Council and may create personal legal liability;
- the Council is the corporate decision-making body and no individual Councillor may make a Council decision through social media;
- some issues are best handled through the Council's official accounts and an agreed message can be critical;
- official Council channels and resources must not be used for party-political purposes;
- there is no need to respond to every comment or post;
- posts must not discriminate or harass on grounds including race, sex, age, disability, sexual orientation, gender reassignment, religion or belief.

9.7 If there is uncertainty about a proposed communication, stop, think and seek advice from the Clerk before publishing or sending it.

10. Review

10.1 This Policy will be reviewed every two years and sooner if legislation, statutory guidance, Council channels or working arrangements change materially.