



### PRUDHOE TOWN COUNCIL SOCIAL MEDIA AND EMAIL POLICY

ADOPTED at the Ordinary Meeting on 15<sup>th</sup> May 2025

**Highlighted text identifies updates and additions incorporated as of May 2026.**

1.	Policy Statement .....	2
2.	The Scope of the Policy .....	2
3.	<b>Legal and Statutory Considerations</b> .....	2
4.	Responsibility for Implementation of the Policy .....	3
5.	Using Social Media Sites in Our Name .....	3
6.	Using Social Media .....	4
7.	<b>Account Security</b> .....	4
9.	Rules for Use of Social Media .....	4
10.	<b>Accessibility Requirements</b> .....	5
11.	<b>Use of AI and Automation Tools</b> .....	5
12.	Monitoring Use of Social Media Websites .....	6
13.	<b>Handling of Harassment and Abuse</b> .....	6
14.	Rules for the Use of Emails .....	7
15.	<b>Disciplinary Action</b> .....	8
16.	<b>Monitoring and Review of this Policy</b> .....	8
14.	Monitoring and review of this policy .....	9



### 1. Policy Statement

- 1.1. This policy is intended to help all employees, volunteers and Councillors make appropriate decisions about the use of social media such as blogs, social networking websites, forums, message boards, or comments on web-articles, such as X (formerly Twitter), Facebook and LinkedIn and emails. This policy applies to all social media platforms, including new and emerging platforms
- 1.2. This policy outlines the standards we require employees, volunteers, and Councillors to observe when using social media, the circumstances in which we will monitor your use of social media and emails, and the action we will take in respect of breaches of this policy.

### 2. The Scope of the Policy

- 2.1. All employees, volunteers and Councillors are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of our Council.
- 2.2. Breach of this policy by employees may be dealt with under our Disciplinary Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.
- 2.3. Breach of this policy by Councillors may be dealt with under the adopted Code of Conduct and as such will be referred to the Monitoring Officer at Northumberland County Council.

### 3. Legal and Statutory Considerations

#### 3.1 Legal Framework

The Council will abide by all relevant and applicable laws, terms, and conditions to ensure the organisation is not exposed to risks. This includes, but is not exclusively limited to:-

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Online Safety Act 2023
- Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 — the current required standard under these Regulations is WCAG 2.2 AA (which superseded WCAG 2.1 AA in October 2024). Compliance with WCAG 2.2 AA is also required to satisfy Assertion 10 of the AGAR (Practitioners' Guide 2025), which all town and parish Councils must declare compliance with from the 2025/26 financial year onwards
- Equality Act 2010
- Defamation Act 2013
- Computer Misuse Act 1990

#### 3.2 Council Policies

All Council use of social media must be carried out in accordance with the Council's policies and procedures, including, but not limited to, the following:-

- Data Protection Policy
- Equal Opportunities Policy
- Freedom of Information Policy
- IT Policy



### 3.3 Safeguarding

The use of social media platforms must at all times align with the Council's duty to safeguard children, young people, and vulnerable adults, in accordance with all relevant statutory and safeguarding requirements. Prior authorisation must be obtained before publishing images of minors, in line with safeguarding procedures, and appropriate consent must be secured from parents or guardians where required.

### 3.4 Political Neutrality

Employees using social media for official business purposes must remain politically neutral at all times and must not express or imply personal political views or affiliations.

### 3.5 Pre-election Period

During the six-week period preceding a local, general, or European election, commonly referred to as the pre-election period, the Council must avoid any action or communication that could reasonably be perceived as supporting or opposing a political party or candidate.

During this period:-

- The Council may continue to publish essential service announcements via social media; however, responses or comments considered overtly political may be removed where appropriate.
- Existing social media content should be reviewed to identify and manage any material that may be politically sensitive.
- Employees should refrain from publishing content that could be interpreted as seeking to influence voters or public opinion.
- Any responses to political comments or enquiries must remain factual, impartial, and free from personal opinion.
- Where there is any uncertainty regarding the suitability of content, advice should be sought from the Clerk prior to publication.

## 4. Responsibility for Implementation of the Policy

4.1. The Council has overall responsibility for the effective operation of this policy.

4.2. The Clerk is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to our work.

4.3. All employees, volunteers and Councillors should ensure that they take the time to read and understand the policy. Any breach of this policy should be reported to the Clerk/Chair.

4.4. Questions regarding the content or application of this policy should be directed to the Clerk.

## 5. Using Social Media Sites in Our Name

5.1. Only the Clerk or delegated officers, under the direction of the Council, is permitted to post material on the Council website and social media, in the Council's name or on behalf of the Council.

5.2. The Clerk is the nominated Press Officer with the authority to issue press releases. No other member staff or members has the authority to issue public statements on behalf of the Council.

5.3. Employees, volunteers, and Councillors are encouraged to share official press releases and postings made by the Clerk or delegated officers, on behalf of the Council.



### 6. Using Social Media

6.1. We recognise the importance of the internet in shaping public thinking about our Council and community. We also recognise the importance of our employees, volunteers and Councillors joining in and helping shape local government conversation and direction through interaction in social media.

6.2. Before using social media on any matter which might affect the interests of the Council ensure that you have read and understood this policy.

### 7. Account Security

Staff responsible for managing Council social media accounts must:-

- Use strong, unique passwords for each platform
- Enable two-factor authentication where possible
- Never share login credentials via email or any other platform
- Update passwords regularly or when a staff member with access leaves
- Maintain a secure record of access details in line with information security policies

### 8. Using Social Media

We recognise the significant role that the internet and social media play in influencing public perception of the Council and the wider community. We also acknowledge the value of employees, volunteers, and Councillors participating in online discussions and contributing positively to conversations relating to local government and community matters.

Before using social media in connection with any matter that may affect the interests or reputation of the Council, individuals must ensure they have read, understood, and will comply with this policy.

When using social media in a personal capacity, individuals must make it clear that any opinions expressed are their own and do not represent the views of the Council. Employees and Councillors should avoid identifying themselves by their official role or position within the Council when posting personal views online.

### 9. Rules for Use of Social Media

Whenever you use social media, you must adhere to the following general rules:-

- 9.1. Do not upload, post, or forward a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
- 9.2. Any employee, volunteer or member who feels that they have been harassed or bullied, or are offended by material posted or uploaded by a colleague onto a social media website should inform the Chair/Clerk.
- 9.3. Never disclose commercially sensitive, personal private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with Chair/Clerk.
- 9.4. Do not upload, post, or forward any content belonging to a third party unless you have that third party's consent.
- 9.5. Before you include a link to a third-party website, check that any terms and conditions of that website permit you to link to it.
- 9.6. When making use of any social media platform, you must read and comply with its terms of



use.

9.7. Be honest and open, but be mindful of the impact your contribution might make to people's perceptions of the Council.

9.8. You are personally responsible for content you publish into social media tools.

9.9. Do not escalate heated discussions, try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations.

9.10. Do not discuss employees.

9.11. Always consider others' privacy and avoid discussing topics that may be inflammatory.

9.12. Avoid publishing your contact details where they can be accessed and used widely by people you did not intend to see them and never publish anyone else's contact details.

9.13. Be mindful that information published may stay in the public domain indefinitely, without the means for retrieval/deletion.

9.14. Consider whether you are acting in a private capacity, or whether an impression may be conveyed that you are acting for and on behalf of Prudhoe Town Council.

## 10. Accessibility Requirements

- Ensure all social media content is accessible to users in accordance with the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 and complies with the current WCAG 2.2 AA standard. WCAG 2.2 replaced WCAG 2.1 as the applicable standard in October 2024 and is required for Assertion 10 compliance.
- Provide appropriate alternative text for all images and visual content.
- Ensure all video content includes suitable captions, subtitles, or transcripts where appropriate.
- Use clear, concise language and avoid unnecessary abbreviations, acronyms, or technical jargon.
- Ensure sufficient colour contrast is maintained to meet recognised accessibility standards.
- Ensure touch targets, including buttons and interactive elements within social media graphics or linked web content, are appropriately sized for users with limited motor control. WCAG 2.2 Success Criterion 2.5.8 requires a minimum target size of 24 × 24 CSS pixels.
- Where online forms, login pages, or authentication processes are linked from social media, ensure users are not required to complete a cognitive function test, such as a complex CAPTCHA, as the sole means of authentication. WCAG 2.2 Success Criterion 3.3.8 requires an accessible alternative authentication method.
- Ensure any support or help mechanisms provided on the Council website, including contact forms, email links, or telephone numbers, are presented consistently across webpages in accordance with WCAG 2.2 Success Criterion 3.2.6, supporting users with cognitive impairments.
- Format hashtags using camel case to improve readability and accessibility (for example, #TownCouncilMeeting rather than #townCouncilmeeting.)

## 11. Use of AI and Automation Tools

- AI tools may be used to help create content, but all content must be checked by a person before it is published.
- Scheduled posts should be reviewed before they go live to ensure they remain appropriate and accurate.
- Any AI-generated content must be clearly reviewed and must meet the Council's standards and expectations.
- AI tools must not be used to respond directly to residents' enquiries without human oversight.
- Any AI tools used must comply with the Council's data protection requirements and obligations.



### **12. Monitoring Use of Social Media Websites**

- 12.1. Employees, volunteers and Councillors should be aware that any use of social media websites (whether or not accessed for Council purposes) may be monitored and, where breaches of this policy are found, action may be taken against employees under the Disciplinary Procedure and in respect of Councillors, via the adopted Code of Conduct.
- 12.2. Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against the Council and its employees.
- 12.3. In particular, a serious case of uploading, posting, forwarding, or sharing a link to any of the following types of material on a social media website, whether in a professional or personal capacity, will probably amount to gross misconduct (this list is not exhaustive):-
- a) Pornographic material (that is, writing, pictures, films, and video clips of a sexually explicit or arousing nature);
  - b) A false and defamatory statement about any person or organisation;
  - c) Material which is offensive or obscene;
  - d) Material which is criminal, discriminatory, derogatory or may cause embarrassment to the Council, Councillors, or our employees;
  - e) Confidential information about the Council or anyone else;
  - f) Any other statement which is likely to create any liability (whether criminal or civil, and whether for you or the Council); or
  - g) Material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.
- 12.4. Any such action by Councillors will be addressed under the adopted Code of Conduct, and be referred to the Monitoring Officer. Any such action by employees will be addressed under the Disciplinary Procedure and may result in summary dismissal.
- 12.5. Where evidence of misuse is found we may undertake a more detailed investigation in accordance with our Disciplinary Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the investigation. If necessary, such information may be handed to the police in connection with a criminal investigation.
- 12.6. Any breach of this policy should be reported to the Clerk and Chair of the Council.

### **13. Handling of Harassment and Abuse**

#### **13.1. Reporting Procedures**

Employees and Councillors who experience online harassment, abuse, or threatening behaviour connected to Council business must report the matter immediately to the Clerk. Reports should include details of the social media platform used, the nature of the behaviour, and, where known, the identity or account details of the individual concerned. All reports will be assessed promptly and managed in accordance with the Council's Complaints Policy, which sets out the Council's approach to managing unacceptable behaviour.

Screenshots, copies, or other records of abusive or concerning communications should be retained before any content is deleted, hidden, or blocked.

Where communications contain serious threats, including threats of violence or harm, the police should be contacted immediately and the Clerk informed without delay. Communications involving threats of death or serious harm, or the intentional sending of false information designed to cause psychological or physical harm, may constitute criminal offences under the Online Safety Act 2023. The Clerk will advise on whether a formal police referral is appropriate and will ensure relevant evidence is retained to support any investigation.



### 13.2 Actions and Response Measures

Employees and Councillors must not engage with abusive, threatening, or harassing content online. The Clerk will determine the most appropriate course of action in response to serious incidents or repeated unacceptable behaviour.

Legal advice may be obtained where harassment, abuse, or threatening conduct is persistent or severe. Where behaviour falls within the scope of the Council's Vexatious, Persistent, Aggressive and Abusive Complaints Policy, the staged response process outlined within that policy will be followed. This may include written warnings, restrictions on communication, suspension of engagement through specific channels, or referral to the police where necessary. Any decision to restrict or block an individual will be recorded appropriately and communicated in accordance with the policy.

The Council reserves the right to block or restrict access to its social media accounts where an individual's behaviour is abusive, threatening, discriminatory, or persistently unreasonable. Blocking an individual from social media does not prevent them from contacting the Council through alternative official channels. Decisions to block users will be made by the Clerk, formally documented, and reviewed periodically in line with the Council's procedures.

Appropriate support and guidance will be made available to any employee or Councillor affected by online harassment or abuse.

### 13.3 Preventative and Protective Measure

Privacy and security settings on social media accounts should be reviewed regularly to reduce the risk of misuse or harassment.

Employees and Councillors will be provided with appropriate guidance or training on recognising, managing, and reporting online harassment and abusive behaviour.

Accurate records of incidents, actions taken, and responses should be maintained to support effective management and, where necessary, formal investigation.

The Council recognises its duty under the Worker Protection (Amendment of Equality Act 2010) Act 2023 to take reasonable steps to prevent sexual harassment of employees, including harassment occurring through online and digital channels during the course of employment. This duty extends to harassment by members of the public, contractors, service users, or other third parties via social media or related platforms.

The Council also recognises the enhanced legal protections available to public officeholders, including local Councillors, under the Crime and Policing Act 2026. Where online conduct directed at a Councillor in their official capacity amounts to harassment, stalking, intimidation, or behaviour causing fear or distress, the Clerk will provide guidance on the appropriate reporting process and any available legal remedies, including referral to the police or consideration of protective orders where appropriate.

## 14. Rules for the Use of Emails

14.1. Emails are the primary method to promote effective communication on matters relating to Council business and therefore should be used for that purpose only.

14.2 Employees and Councillors should use official Council email addresses for all Council business. Members must use an email address hosted on a Council-owned domain for all official Council business. The use of personal or free consumer email services, such as Gmail, Hotmail, Yahoo, or Outlook.com, for Council correspondence is prohibited in accordance with AGAR Assertion 10 (Practitioners' Guide 2025.)

14.3. While the domain suffix is not required to be ".gov.uk", the email service must be a paid, professionally hosted service operating on a domain owned and controlled by the Council. The use of free consumer email platforms is not permitted because the Council does not have



ownership or control over those services, creating potential risks relating to data governance, records management, and compliance with Freedom of Information and Subject Access Request obligations.

- 14.4. Any Member who is not currently using a compliant hosted email address should contact the Clerk as a matter of priority to arrange appropriate access.
- 14.5. Messages sent by email should be written in accordance with the standards of any form of written communication, and the content and language used in the message must be consistent with Council best practice. Messages should be clear and concise and directed to those individuals with 'a need to know'.
- 14.6. If a sensitive or contentious matter needs to be addressed, consider speaking to the recipient first, by telephone or in person, then follow-up with an email.
- 14.7. Emails should not be used for spreading gossip, or for personal gain, or in breach of any of the Council's policies on Equality, Bullying and Harassment and in keeping with Member's Code of Conduct and an Employee's Contract of Employment.
- 14.8. When responding to a large group of recipients, the 'reply all' facility should be used, but caution should be taken that others have not copied in recipients who should not be disclosed to or who have not agreed to share their contact details.
- 14.9. Confidential information should not be sent externally without the approval of the Chair/Clerk.
- 14.10. Erroneous email messages can give rise to legal action against the Council or individual Councillors. Claims for defamation, harassment, breach of confidentiality or contract could result. It is vital that email messages be treated like any other form of correspondence and, where necessary, copies should be saved and retained. Messages are disclosable in any legal action commenced against the Council or individual Councillors.

### **15. Disciplinary Action**

Misuse of email communications in any of the following areas may result in action being taken under the Council's Disciplinary Procedure or Code of Conduct:-

- Defamatory statements or comments
- Inappropriate, obscene, abusive, or offensive content
- False, misleading, or malicious communications
- Discriminatory content or behaviour contrary to the Council's Equality Policy
- Breaches of confidentiality or unauthorised disclosure of information

### **16. Monitoring and Review of this Policy**

The Clerk shall be responsible for reviewing this policy annually to ensure that it meets the legal requirements and reflects best practice. Changes will be considered by the Council. This review should include:-

- Reviewing compliance with current legislation and regulatory requirements
- Evaluating the effectiveness of the policy in supporting and guiding employees and Councillors
- Taking account of lessons learned from incidents, complaints, or emerging issues
- Considering the impact of new technologies, digital tools, and social media platforms
- Consulting with relevant stakeholders to identify opportunities for improvement



# Prudhoe

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## TOWN COUNCIL

- 13.1. External emails received by individual Councillors should be forwarded to the Clerk, and the Chair if appropriate, who will in turn forward to all Councillors.
- 13.2. Mis-use of emails in the following categories can lead to action being taken in accordance with the Disciplinary Procedure or the Code of Conduct:
  - 13.2.1. Defamation of character
  - 13.2.2. Inappropriate, obscene, or offensive content
  - 13.2.3. Untrue or malicious content
  - 13.2.4. Any discrimination in line with the Council's Equality Policy.
  - 13.2.5. Breach of confidentiality

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