

Communications Policy 2021 - 2024

(A4431960)

1. Purpose and Intent

Frankston City Council uses a variety of traditional and digital communication channels to inform, educate, engage and consult with the community on Council decisions, policies, programs, services and events.

Council communications should:

- Promote Frankston City as a great place to live, work, learn, visit and invest
- Instil pride in the Frankston City community
- Help improve the reputation of Council and Frankston City

All communications will be written, produced and distributed in an accessible manner. Council will maximise the use of electronic and online communication to reduce printed material where practicable, both for the benefit of the environment and to expedite communicative outcomes.

This Policy provides guidance for the appropriate use of communications tools, including verbal, printed, electronic and online, to help build the positive reputation of Council and to facilitate Council's effective voice within, and on behalf of, the community.

The intent of this Policy is that all official Council communications will be a positive reflection of Council's commitment to informing the community in a manner that is clear, concise, accurate and consistent with Council decisions and policies.

2. Scope

This Policy applies to Frankston City Council Councillors, employees, contractors and volunteers. This Policy relates to all verbal, printed, electronic and online communications. It is aligned with the Councillor Code of Conduct and Staff Code of Conduct.

During a Council election this Policy should be read in conjunction with the Frankston City Council Caretaker Policy. During an emergency it should be read in conjunction with the Municipal Emergency Management Plan.

3. Definitions

Caretaker period (defined in the Local Government Act 1989 as 'Election Period'):

the period that:

- a. starts on the last day on which nominations for that election can be received; and
- b. ends at 6pm on local government election day.

City: the Local Government Area (municipality) of Frankston City.

Council: Frankston City is governed by nine Councillors democratically elected in accordance with the Local Government Act 1989. Collectively, they constitute the Council.

Electronic communication: any communication channel that is transmitted electronically, for example emails and e-newsletters.

Media: print, broadcast (television and radio), online and social media.

Media Relations Staff: Officers within Council's Communications Team who are responsible for responding to and liaising with external media organisations and outlets.

Online communication: any communication channel that uses the internet, for example social media and websites.

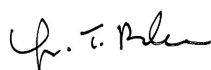
Organisation: led by the CEO, the Organisation manages the day to day operations of Council and implements Council decisions.

Social media: web-based technology, such as Facebook, Twitter, Instagram and YouTube, that allows an exchange of dialogue between organisations, communities and individuals.

Conduct bringing Council into disrepute: Conduct which discredits or damages the reputation of the Council or the City, or which would be likely to cause members of the public to form a negative view of the Council or the City.

4. Authorisation

This Policy is managed by the Community Relations Department, and is approved by Frankston City's Mayor and Council's Chief Executive Officer (CEO):



Mayor, Frankston City

CEO, Frankston City Council

in accordance with Frankston City Council resolution at its Ordinary Council meeting of 19 April 2021.

5. Policy

5.1 Spokespersons

- 5.1.1 The role of Council's official spokesperson applies to all media, including all verbal, printed, electronic and online communications, as per the Scope of this Policy (see Section 3). For clarity this covers all media – including but not limited to printed publications, radio, television, online websites, online groups and social media (including public and private pages and groups).
- 5.1.2 The Mayor is the official spokesperson on decisions made by Frankston City Council and advocacy with governments. The Deputy Mayor is the delegated spokesperson in the absence of the Mayor. The Mayor may appoint another Councillor as the Council's delegated spokesperson if appropriate.

- 5.1.3 The Communications Team may at times engage individual Councillors to feature in communications to promote Frankston City as a great place to live, work, learn, visit and invest (for example, a social media video highlighting local reserves).
- 5.1.4 Councillors are entitled to communicate their own views to the media, constituents and others, but must not actively undermine any decision or position already taken by Council or bring Council into disrepute. Councillors must make it clear that they are expressing their own individual view and not the official position of Council.
- 5.1.5 A Councillor must not communicate in any manner that is likely to defame, slander or attempt to defame or slander another member of Council, Council staff, contractors, volunteers or residents or ratepayers. They must not publish, share, or create communications that are untrue, inaccurate or have the potential offend a person or group, nor encourage others to do so.
- 5.1.6 Councillors are responsible for ensuring that any information or response they provide is accurate and consistent with Council decisions, legislation and policies. Councillors must only share information that is already publicly available.
- 5.1.7 Councillors must notify the Mayor and CEO prior to making any comments in or to media, to ensure the Mayor (or delegated spokesperson) can be prepared to officially respond to subsequent media requests. If prior notification is impractical, Councillors must notify the Mayor and CEO immediately following making any comments.
- 5.1.8 Where a Councillor holds a position with an external organisation they must make clear in any and all communications whether they are representing:
- An official position of Frankston City Council
 - An external organisation
 - Their own individual opinion (in the absence of an official position)
- 5.1.9 In accordance with the Councillor Code of Conduct, care needs to be given to ensure:
- Any statements do not bring Council or the organisation into disrepute
 - Privacy and data security obligations are complied with and only publicly available information is shared
- Any failure to comply may result in action in accordance with the Councillor Code of Conduct.
- 5.1.10 The CEO is the official spokesperson on Frankston City Council's operational matters. The CEO may delegate the operational spokesperson role to a member of the Executive Management Team during any absence. The CEO may appoint another Council officer with

specialist technical knowledge to be a delegated spokesperson and/or comment in relation to a specific topic.

- 5.1.11 The CEO must advise the Mayor of any delegation to other Council officers made under section 5.1.9.
- 5.1.12 The Coordinator Communications may include comments from community members and/or Council officers in communications, to add further depth and interest to the communication piece. Where appropriate, Council's official spokesperson (Mayor/CEO/delegate) will feature and will be at least equally represented. Where the communications piece is not directly related to Council activities and instead is a positive representation of Frankston City as a place to live, work, learn, visit and invest, Council's official spokesperson may not feature.
- 5.1.13 Council officers, contractors and volunteers are not authorised to speak on behalf of Council or the Organisation without the express authorisation of the CEO. Public comments made as private community members, via any communication channel, need to clearly outline that they are personal opinions only. In accordance with the Staff Code of Conduct care needs to be given to ensure:
- Any statements do not bring Council or the Organisation into disrepute
 - Privacy and data security obligations are complied with and only publicly available information is shared
- Any failure to comply may result in disciplinary action in accordance with the Staff Code of Conduct.

5.2 Promoting Council business

- 5.2.1 Council's communication channels and resources will be used only to promote and disseminate the decisions, intentions, activities and actions of Council, and will not be used to promote individual Councillor or Officer views.

5.3 Councillors as candidates

- 5.3.1 Council's communications channels and resources will not be used for political advantage by Councillors who are candidates, or representing someone else who is a candidate, in a Local, State or Federal Government election.
- 5.3.2 As per 6.6.7, official Councillor portraits remain the property of Frankston City Council at the end of a Council term. These portraits will not be provided to Candidates for use in any subsequent election periods.

5.4 Promoting Frankston City

- 5.4.1 To support Council's role to promote Frankston City as a great place to live, work, play and invest, Council may at times include local Frankston City businesses, organisations and community groups in Council communications. Council will endeavour to include a range of

different businesses, organisations and community groups as appropriate to reflect and celebrate the diversity and richness of Frankston City.

5.5 Publications and promotional material

- 5.5.1 All publications and promotional material (print and online) about Council decisions, policies, programs, services and events must adhere to Council's branding guidelines.
- 5.5.2 All publications and promotional material should be accurate, informative and written in plain language in line with Council's internal Style Guide. They should be produced and distributed so that they are accessible to the relevant audience. This includes the use of accessible templates.
- 5.5.3 All official Council endorsed strategy documents and policies may (as appropriate) include an introductory message from the Mayor as at the date of publication. This message must be approved by the CEO and Mayor.
- 5.5.4 Council will regularly communicate Council decisions, policies, programs, services and events through a wide range of communication channels. These channels will not be used to promote individual agendas, political or otherwise, or criticise Councillors, Council decisions, community members, members of the government or opposition, or Council Officers.
- 5.5.5 All communications sent directly (i.e. personally addressed) to an individual must comply with Council's Privacy Policy, particularly:
 - The contact details of community members remain confidential and not provided to a third party to be used for other purposes
 - The communication and database are not used to promote anything outside the original purpose to which recipients agreed, unless they consent
 - Recipients are provided with a mechanism to opt out at any time

5.6 Photographs

- 5.6.1 Council must comply with privacy, copyright and freedom of information legislation in regards to photographs.
- 5.6.2 Council must have authorisation to use images of people. The authorisation must specify whether consent has been given for a specific use of the image or ongoing use of the image as a stock photo. A record of the authorisation must be retained in Council's document management system. It is essential there is parental/guardian authorisation in writing for anyone featured under the age of 18.
- 5.6.3 Council photographs must not be passed onto a third party for any purpose, without express written authorisation from the Coordinator Communications. Council photographs are approved for Council purposes only – additional approvals are required prior to supplying to a third party.

- 5.6.4 Council cannot use photographs from third parties without authorisation, including photographs from the internet. Authorisation must be gained and Council may be required to credit the photographer or source.
- 5.6.5 The *Freedom of Information Act 1982* gives anyone the right to request a copy of any document held by Council, including photos. All requests must be directed to Council's Freedom of Information Officer.
- 5.6.6 All Councillors will have an official Councillor portrait to be used during their Councillor term. All official Councillor portraits will be up-to-date and consistent in their aesthetic, to present a unified and modern look, in-line with corporate branding. Official Councillor portraits will be taken by a Council photographer within the first month of a new Council being elected. Councillors cannot supply their own image to be used as the official Councillor portrait.
- 5.6.7 Official Councillor portraits remain the property of Frankston City Council at the end of a Council term. These portraits will not be provided to Candidates for use in any subsequent election periods.
- 5.6.8 Images taken by or of Councillors (for example, at community events) may be passed to the Communications Team for use in Council communications, so long as appropriate authorisations have been obtained by people in the image/s (see 5.6.2).

5.7 Speeches

- 5.7.1 The Mayor and/or CEO (or their delegates) are the official spokespersons for Council at events.
- 5.7.2 The Mayor takes precedence at all municipal proceedings within Frankston City.
- 5.7.3 Council resources will support the preparation of speeches for the official spokesperson/s only.
- 5.7.4 Speeches should include a Welcome to Country or Acknowledgement of Country, as appropriate.

5.8 Letters

- 5.8.1 Council letterhead must only be used for the official business of Council and not to promote individual Councillor or officer views that are inconsistent with or contrary to those of Council.
- 5.8.2 Councillors should be mindful of the appropriateness of using Council letterhead (or other Council assets such as email addresses) to write letters of support or recommendation for Frankston City based community groups, businesses and/or individuals. If in doubt, the Councillor should seek guidance from the Mayor.

5.9 Websites and social media

- 5.9.1 Council will use online channels, such as websites and social media, to provide timely and accurate information to the community and also engage with and listen to the community.

- 5.9.2 Council will maintain and periodically upgrade its website to ensure compliance with World Wide Web Consortium (W3C) industry standard accessibility. Emphasis will be placed on ensuring sites are user friendly and easy to navigate, and information is accurate and up to date.
- 5.9.3 Council's corporate website is frankston.vic.gov.au. Council may also maintain additional websites that focus on particular community information needs, such as investment attraction, libraries, visitor attraction or the Frankston Arts Centre.
- 5.9.4 Councillors will each have a profile on Council's corporate website that features their contact information, a photograph, Council Committee memberships and a short biography (maximum 400 words). All biographies must be approved by the Mayor and CEO prior to publication.
- 5.9.5 All Council social media channels must be used in accordance with Council's Social Media Protocols for Officers, Volunteers and Contractors, Frankston City Councillor Code of Conduct, Frankston City Council Staff Code of Conduct and any relevant privacy and records management legislation.
- 5.9.6 All login details to access Council-owned and managed websites and social media platforms are to be retained and managed by relevant Council officers. These will not be provided to Councillors.
- 5.9.7 All official statements from Frankston City Council will be announced first via Council's corporate social media platforms – including decisions made at Council Meetings. This will include reference to the official spokespersons as appropriate.
- 5.9.8 Councillors may continue to utilise their personal social media accounts and websites for non-Council related, personal communication. Councillors who choose to activate a Councillor social media account or website must inform the Mayor and CEO of their decision, and provide a URL link to the page/pages, along with a written statement (email or hard copy) pledging their commitment to administering their social media pages and websites in line with all relevant codes and policies.
- 5.9.9 Councillors who administer a Councillor social media page or website are entitled to promote their page and posts using paid/sponsored post promotion at their own expense, however Councillors must notify the Mayor and CEO when this has occurred, and provide a screenshot of the post within one hour of posting.
- 5.9.10 In instances where there is a potential breach of this policy or relevant code, the Mayor can direct a Councillor to temporarily remove the content in question from their social media channels or website for a period of up to 24 hours to allow investigation into the severity of the alleged breach. In instances where no breach has been identified the Councillors may reinstate the content to their website or social media channels.
- 5.9.11 On all social media accounts and websites, personal and Councillor-branded, Councillors must include in the header or other prominent place a statement that confirms they are

providing their own individual comment and are not speaking on behalf of Frankston City Council. The same statement must be included in each individual post to their Councillor-branded social media pages. When commenting on other social media pages, including groups, Councillors must make it clear they are expressing their own individual view. This does not apply to websites or social media pages which represent a business owned by a Councillor for the purpose of generating income.

- 5.9.12 Council officers are not allowed to manage Councillor social media accounts or websites on their behalf, under any circumstances, however Councillors can seek advice from the Coordinator Communications prior to posting should they require clarification as to whether a post on social media, or an update to a website is appropriate.
- 5.9.13 Where a Councillor has a social media account or website that refers to them as a Councillor, in accordance with Council's Election Period Policy this account must be deactivated during an Election Period and may only be reactivated upon the individual being officially sworn in as a Councillor of Frankston City Council.
- 5.9.14 When interacting on social media as a Councillor, Councillors must adhere to sections 5.1.4 through 5.1.8 of this policy, and ensure they:
- Do not actively undermine any decision or position already taken by Council or bring Council into disrepute
 - Make it clear they are expressing their own individual view and not the official position of Council
 - Only provide information that is accurate and consistent with Council decisions, legislation and policies
 - Only share information that is already publicly available
 - Notify the Mayor and CEO of any comments made
- 5.9.15 If a Councillor either is, or plans to be, an administrator of an online group (either upon being sworn in as a Councillor or during their Councillor term), they must seek approval from the Mayor to continue (or begin) doing so.

5.10 Emergency Communications

- 5.10.1 Council is responsible under the Emergency Management Acts 1986 and 2013 which include supporting emergency communications. How Council meets those responsibilities is detailed in the Municipal Emergency Management Plan (MEMP). The Mayor and Councillors have no direct role but may be called upon to assist where appropriate.
- 5.10.2 During times of emergency it is imperative that communications to the community are consistent and accurate. To mitigate misinformation being given to the community all

communication from anyone representing Frankston City Council must be overseen by the Emergency Communications Coordinator. Refer to the MEMP for further detail.

5.11 Media assistance for Councillors (other than the Mayor and Deputy Mayor)

- 5.11.1 Council's communications resources are typically only available to support Council's official spokesperson. At times, individual Councillors may require media support – for example, in an emergency or where a situation may become a significant media issue. The Mayor and CEO may provide approval for the Coordinator Communications and other relevant officers to provide communications advice and resources.
- 5.11.2 Councillors may request communications support at an event or function. Support will only be provided following authorisation from the Mayor and CEO.

5.12 Processes

- 5.12.1 Community Relations (Communications) manages all communication campaigns, media requests for interviews and responses, media liaison and proactive media releases for Frankston City Council.
- 5.12.2 All media enquiries and requests, including those from journalism students, must be referred to the Communications team. No employee, contractor or volunteer is to liaise directly with the media unless they have the express authorisation of the CEO (or delegate). The only approved exception is the authorised person at the Frankston Arts Centre for promotion and publicity purposes. All issues related media queries and requests for speeches must still be referred to the Communications Team.
- 5.12.3 After receiving a media enquiry or request, the Communications team will contact the relevant business area to source accurate and up-to-date information. If the enquiry is about a sensitive issue, the Communications team will seek direction from the CEO or the Mayor and, in some cases, Council.
- 5.12.4 The Communications team will decide, in conjunction with the Mayor and CEO, on an official spokesperson (as per section 6.1 of this Policy). The Communications team will then coordinate for a response to be drafted, fact checked and approved by the CEO and Mayor. The response will then be sent to media and/or the person being interviewed.
- 5.12.5 Business areas must notify the Communications team of any upcoming campaign, announcement, program or changes to laws, etc. which may be of interest to the community. The Communications team will discuss the detail, timing and photograph opportunities with the business area and decide on the best course of action.
- 5.12.6 Councillors and/or Council officers should immediately contact the Communications team if they become aware of a potential or actual media issue or incident. The Communications team will work with the Mayor, CEO and relevant business area on the appropriate action.

5.12.7 All Council social media sites are to be approved by the Manager Community Relations, in accordance with the Communications Policy and Social Media Protocol.

6 Roles and responsibilities

- 6.1 It is the role of Council to support this Policy in actions and decision-making.
- 6.2 The Mayor is responsible for developing a culture among the Council that understands and values the importance of effective media and communications management at the highest levels within Council.
- 6.3 The CEO is responsible for developing a culture within the Organisation that understands and values the importance of effective media and communications management at the highest levels within the organisation.
- 6.4 The Mayor is responsible for ensuring all Councillors are aware of this Policy.
- 6.5 The Manager Community Relations and the Coordinator Communications are responsible for ensuring Councillors, Council Officers, contractors and volunteers are aware of this Policy.
- 6.6 Managers and Coordinators within Council are responsible for ensuring all Council Officers follow this Policy.
- 6.7 The Community Relations Department is responsible for developing, approving and implementing Council's media and external communications strategies with the relevant approvals, in line with communications processes (refer to section 7).
- 6.8 The Mayor, CEO and relevant Community Relations staff should endeavour to create, and maintain positive working relationships with local media outlets. Media enquiries should be responded to efficiently and effectively without bias.
- 6.9 The Communications team:
 - Upholds this Policy in all communications management activities
 - Provides advice to the Mayor and the CEO on media matters and potential media issues
 - Arranges media training for Council spokespersons
 - Provides advice and support to any delegated spokesperson
 - Is the only area authorised to post on corporate social media sites
 - Has oversight of all Council owned and managed social media sites

- Provides final approvals for print and broadcast advertising (excluding public notice, tender, recruitment and the Frankston Arts Centre advertising), speeches (in conjunction with the relevant subject matter expert and the official spokesperson delivering the speech), Frankston City News, promotional flyers/brochures and all email newsletters
- Does not provide administrative support for Councillors' individual social media sites
- Does not provide support or information to individual Councillor campaigns

6.10 The Manager Community Relations (or delegate) is responsible for approving new websites and social media sites relevant to specific target audiences and authorising the appropriate Council Officer(s) to post content on behalf of Council. The Manager Community Relations (or delegate) reserves the right to remain an administrator of any page.

6.11 The Community Relations Department will maintain a database of all logins and passwords of all corporately owned and managed social media sites, website content management systems and e-newsletters.

7 Policy non-compliance

Non-compliance with this Policy has the potential to impact negatively on the reputation of Council and its ability to maintain the continued support of the Frankston City community, Victorian and Australian governments and other Local Councils.

Failure to comply with this Policy will be treated seriously and may incur disciplinary measures in accordance with the Council Staff Code of Conduct and the Councillors' Code of Conduct.

8 Related documents

- 8.1 Frankston City Council Councillors' Code of Conduct 2016 (being revised)
- 8.2 Frankston City Council Staff Code of Conduct 2012 (being revised)
- 8.3 Frankston City Council Municipal Emergency Management Plan
- 8.4 Frankston City Council Election Period Policy
- 8.5 Frankston City Council Media Policy, 1997 (superseded by this Policy)
- 8.6 Peninsula Aquatic and Recreation Centre (PARC) Media Policy
- 8.7 Frankston Arts Board Media Policy
- 8.8 Local Government Act 1989
- 8.9 Privacy and Data Protection Act 2014
- 8.10 Public Records Act 1973
- 8.11 Copyright Act 1968
- 8.12 Freedom of Information Act 1982
- 8.13 Frankston City Council Media Management Protocols 2016
- 8.14 Frankston City Council Social Media Protocols – Council officers, contractors, volunteers 2016
- 8.15 Frankston City Council Logo Usage Protocols 2015

- 8.16 Frankston City Corporate Branding Guidelines, 2015 (being revised)
- 8.17 Frankston City Council Publication Style Guide
- 8.18 Frankston City Council Photography and Photo Library Guidelines 2016
- 8.19 Frankston City News Terms of Reference (being revised)
- 8.20 Frankston City Council Community Engagement Strategy/Plan
- 8.21 Frankston City Council Public Interest Disclosure Policy

9 Implementation of the Policy

This Policy (in conjunction with other Related Documents) will be incorporated into the key decision making processes of Council. Council will develop a range of tools to assist Councillors, Council Officers, contractors and volunteers to understand their role in media and communications management.

10 Document History

Date approved	Change Type	Version	Next Review Date
19 April 2021	Revision	Version 2	April 2025