



POLICY

Policy No. 12 127 22/04/04
Department: Administration

Communications, Correspondence and Social Media

SCOPE AND PURPOSE

A cohesive framework for communications, public relations and correspondence in a small organization.

POLICY OBJECTIVE(S)

1. To guide the conduct and use of electronic communications.
2. To establish a protocol for receipt of and response to Town correspondence and to ensure such correspondence will be handled in a consistent manner.
3. To establish guidelines and limitations to the use of Social Media platforms to promote/ advertise the Town of Nanton and further enhance communications.
4. To establish guidelines for internal communications between Council and staff.
5. To provide guidelines for the live streaming and management of video recordings of Council meetings.

RELEVANT DOCUMENTS AND AUTHORITIES

Logo and Coats of Arms (Branding) Policy
Town of Nanton Records Retention Bylaw
Council Procedures Bylaw
Town of Nanton Code of Conduct Bylaw
Municipal Government Act
Freedom of Information and Protection of Privacy Act

DEFINITIONS

For this policy “**electronic communication**” must be defined as: “any communication via electronic means that involves a text or printable message”.

Chair means the Mayor or chair of the meeting.

Chief Administrative Officer means the CAO of the Town or his/her designate.

Correspondence includes any request for information, request for clarification, conveyance of information or a complaint pertaining to corporate service delivery, received by the Town via any one or more of mail, electronic mail, facsimile, or hand delivered letter, and may include responses thereto.

The following types of correspondence are excluded from the definition of correspondence in

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REPLACES POLICIES: 11-250-20/10/05 AND 12-50-19/02/04

this policy with respect to inclusion on public Council Agendas:

- i) routine service requests directed to individual departments (or mistakenly addressed to Mayor and Council);
- ii) service repairs and disruptions requiring emergency action;
- iii) all matters handled by Human Resources and Payroll Services;
- iv) all matters pertaining to litigation or potential litigation or bylaw enforcement;
- v) all matters protected under Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP); and
- vi) all matters related to the grounds for closing a Council or Committee meeting to the public pursuant to the *Municipal Government Act*;
- vii) correspondence that is deemed by the Mayor and Council or the CAO, or his/her delegate, to be or to include parts that are or may be defamatory, threatening, deliberately repetitious, vexatious or grossly inappropriate.

Council means the Council of the Town of Nanton and in this policy includes all Committees as established by Bylaw.

Council Chambers means the Town of Nanton council chamber.

Open Meeting means any meeting of Council open to the public in accordance with section 197 of the Municipal Government Act.

Posts include content posted to Social Media accounts managed by the Town and or any Contracted Service Provider retained on behalf of the Town for the purpose of marketing and communications services such as: comments, information, articles, pictures, videos, or any other form of communicative content.

Social Media means content created by individuals, using publishing technologies, through and on the internet including, but not limited to Facebook, blogs and Twitter.

Town means the Town of Nanton.

Town's Website means the websites administered and controlled by the Town of Nanton, which may include, but is not limited to www.nanton.ca, web-based video management applications, and social media.

PROCEDURE:

1. ELECTRONIC COMMUNICATIONS:

- a. All Town business-related e-mail correspondence is the property of the Town, is subject to the *Freedom of Information and Protection of Privacy Act* (FOIP) and must not be deleted.
- b. Correspondence that is deemed by the Mayor and Council or the CAO, to be or to include parts that are or may be defamatory, threatening, deliberately repetitious, vexatious or grossly inappropriate do not necessitate a response, broader circulation or acknowledgement, but must be retained.
- c. All e-mails addressed to and received by a majority of Council must be forwarded by the Mayor to the CAO and to the Legislative Services for inclusion in the next regular Agenda or Circulation

package, if it meets the definition of correspondence in this policy. If the e-mail was not received by the Mayor, the Councilors who received it must forward it as aforesaid.

- d. E-mails addressed to a majority of Council may be responded to by the Mayor prior to the next Council meeting if circumstances warrant. Such email responses must be copied to all of Council and the CAO, must not contradict current Council policies, and must note they are subject to Council approval, correction, clarification or further comment. Such responses must be attached to the next Agenda package, subject to Agenda cut-off dates and considerations of confidentiality or other aspects of this policy.
- It should be noted that individuals who correspond with Council via e-mail or other media do not always realise (in a dominantly electronic age) that their messages or requests may automatically go to a public agenda as formal correspondence. If a correspondent subsequently does not wish the record to appear on a public agenda before deadline, it must still be retained for FOIP purposes, but Administration may find an alternate approach to reporting the correspondence in public or resolving the matter without public circulation (if an action by Council **has not** been requested).
 - Members of the public who send and address e-mails to Mayor and Council, particularly if requesting an action that only Council can grant, should always expect that the unabridged contents of their correspondence will likely appear on a public agenda and that a response from the Town will likely not be forthcoming until after a Regular Meeting. Council business must be conducted in properly convened meetings.
- e. All Town business-related e-mail correspondence is to be sent using the unique Town e-mail address assigned to the user.
- f. Personal e-mail addresses must not be used for Town business. In serious or technical situations where a Town address is not available, a personal address can be used if the user's Town address is in the cc or bcc fields.
- g. Electronic correspondence that concerns discussion of Council decisions, or future proposed public agenda items sent by a Councillor shall be copied to all of Council as well as the CAO.
- h. All electronic communications of an informational nature, from one Council member to another, are to be copied to all of Council and do not need to be shared with Administration unless agreed upon either by the sender or by the majority of Council.
- i. Electronic communication from any member of Council to staff is to be copied to all of Council as well as to the CAO.
- j. Electronic communication from any member of staff to any member of Council is to be copied to the CAO.
- k. Electronic communication of direction to current or potential Town consultant(s) or contracted service providers is to be sent by, or at the direction of, department managers only.
- l. The CAO's e-mail is not a default corporate contact for all general public communications and inquiries, nor is it the location to which electronic invoices are sent.

Such practice quickly overwhelms the inbox at various times throughout the year, risking the correspondents' e-mail or bill being missed altogether and can have the opposite effect of what the correspondent intended (typically expedited or prioritized service).

m. The staff directory shall be prominently accessible on the Town website and other media and the CAO shall implement a consistent of policy of immediately forwarding such

correspondence to the appropriate member of staff or contracted service provider for their review, response to the correspondent and potential action.

2. CORRESPONDENCE:

- a. Submissions to Town Office /Staff: Incoming correspondence received by staff from external sources will be compiled in accordance with the terms of this policy. Where appropriate, the terms of other related standard operating guidelines, policies and/or bylaws will also be followed.
- b. Submissions to Members of Council: Incoming correspondence received by a majority of Council from external sources will be forwarded to staff for appropriate handling as noted in section 2 (c) of this policy.

- c. Processing of Incoming Correspondence:

Incoming correspondence will:

- Be acknowledged by the appropriate member of staff to confirm receipt;
- Be date stamped on the date received or, in the case of information received outside of business hours, on the next business day;
- Be scanned and / or filed as appropriate; and
- **When addressed to Council**, circulated appropriately as soon as possible;
- **When operational in nature**: be referred to the appropriate staff members to review and respond accordingly;
- When operational in nature or concerns existing policy, but **incorrectly or unnecessarily addressed to Mayor and Council**: be referred to the appropriate staff members to review and respond accordingly (rather than be placed on a Council agenda for action/response).

- d. Council Agenda Package:

Correspondence to be included in a Council Agenda package must:

- Contain the name and, preferably, the civic address of the correspondent;
- Be date stamped on the date received;
- Be filed in the general filing system;
- Have been reviewed by the CAO or designate with the Mayor prior to the meeting;
- Be addressed to Mayor and Council or a majority of Council;
- Pertain to matters that are **within the purview of the Town of Nanton**;
- Be received prior to deadline established by Council procedure bylaw;
- Generally, follow this guideline for business meeting time management: correspondence that does not ask for any specific executive or policy action will be placed in the **agenda package for circulation (information only)**, where correspondence requesting **executive or policy action** may be placed in the correspondence section for discussion of response or staff directions.

All personal information, other than telephone numbers and email addresses, will be published with correspondence submissions unless the author requests in writing for their personal information to be severed under section 22 of the Freedom of Information and Protection of Privacy Act.

e. Outgoing Correspondence:

- FROM COUNCIL: Correspondence sent with direction from Council shall be sent by the person designated and may be included in the regular Council Agenda package subject to CAO approval. In the interests of providing residents with timely responses, emails addressed to a majority of Council may be responded to by the Mayor prior to the next Council meeting. Such e-mail responses must be copied to all of Council and the CAO, shall not contradict current Council policies, and must note they are subject to Council approval, correction, clarification or further comment. Such responses will be attached to the next Agenda, subject to Agenda cut-off dates and considerations of confidentiality or other aspects of this policy;
- FROM STAFF: Correspondence sent in response to operational or existing policy/bylaw inquiries shall have responses signed by the CAO or the appropriate staff member. Responses to incoming correspondence may be included in the regular Council Agenda package subject to CAO approval;
- PUBLIC NOTIFICATIONS: By conventional posting, advertising, website update or Social Media.

3. SOCIAL MEDIA AND WEBSITE:

a. The Town shall use Social Media platforms as time and resources permit to:

- Communicate with residents via a modern medium;
- Provide up-to-date and accurate information;
- Promote and encourage participation in Town programs and activities;
- Provide additional general community information as considered useful by administration, Mayor and Council or the Marketing and Communications Service Provider.

b. Ownership and Management:

- Only one central account shall be used for each platform;
- It shall be made clear that they are maintained by the Town and that they follow this policy;
- Management of these accounts shall lie primarily with the Administration directing the Marketing and Communications Service Provider;
- Content shall be monitored by Administration for policy adherence and the interests and goals of the Town.

c. Guidelines and Limitations of Use:

- Only the Town account will be used to provide information to the public;
- Employees and Elected Officials may request that authorized staff or Contracted Service Providers post information on behalf of “the Town” on any Social Media platform;
- Elected Officials may not post as “The Town of Nanton” and are not permitted to discuss campaigns, issues and other political matters on Town accounts unless done in collaboration with Administration;
- All Town Social Media accounts shall adhere to Town policies and bylaws;

- www.nanton.ca remains the Town's primary and predominant internet presence, providing access to detailed levels of information with respect to services, contacts, notices, bylaws, policies and reports;
- Wherever possible, Town social media accounts shall link back directly to the official Town website for forms, documents and other information;
- Administration controls all website structure and content and provides authorizations, when required, to relevant contracted service providers that additionally edit and/or host the site;
- The web-site shall provide links to third party sites where appropriate at the discretion of Administration.

d. Intended Use and Participation from the Public:

- The Town will strive to share information honestly and openly with the public via Social Media platforms and cross-post, where able, to higher traffic local Social Media platforms;
- The Town will not post untruthful or purposefully inaccurate information. If an inadvertent inaccuracy is posted, the Town will correct it as soon as possible;
- All posts and conversations shall remain civil and respectful;
- The Town will not address individual complaints, concerns or service requests via Social Media platforms;
- Administration, in consultation with employees or a Contracted Service Provider, will determine when an issue raised by others via Social Media or other platforms reaches a 'critical mass' that merits a Town response or information submission on the account;
- The Town does not have a dedicated communications employee and Council, the CAO and public should understand that context of the Social Media platforms and why a forum for issue discussion cannot be responsibly encouraged or moderated on the Town account/ platforms;
- The Town reserves the right to restrict and remove any content that is deemed by Administration to be in violation of this or other policies, bylaws or laws;
- All posts on behalf of the Town and all posts by members of the public are deemed public content and are subject to all applicable laws, policies including Alberta's *Freedom of Information and Protection of Privacy Act* (FOIP).

e. Elected Officials and their own Social Media accounts:

- Social media profiles and websites representing the Mayor and Members of Council are exempt from this policy, as are sites representing individuals and Committees of Council that do not fall under Town employee mandate or this policy.
- Social media profiles and websites representing Members of Council are not official information media platforms on behalf of the Town of Nanton. Any information to be communicated to the Town's followers via social media will be provided by the designated Town staff or contracted service provider.
- Council acknowledges that it is not their role to report directly on Town related business and will use their social media profiles and websites as a secondary information source once matters have been officially released by the Town. Council will use the designated sharing tools on the various social media platforms based on this direction. Council will include an "in my opinion" disclaimer either within the banner of their individual social media site(s) or separately when making follow up posts to the Town's social media postings and when creating original posts pertaining to Town related business.
- Members of Council should not use their personal messaging applications on social media to discuss Town business between themselves or with members of the public.

- Members of the public who insist on communicating via personal social media accounts as opposed to Town e-mail or formal correspondence must have protocol explained and enforced by the Member of Council to avoid lengthy ‘threads’ becoming an expectation and potential public record.
- It is each member of Council’s responsibility to ensure that records of Town business or communications are not stored on personal social media accounts or devices beyond a transitory period. Such records should be transferred to an appropriate platform such as Town e-mail.
- Personal “livestream” video posts concerning municipal business must make clear that they are not official Town livestreams nor necessarily reflect a corporate/Council position or endorsement.
- Any dispute or complaint with respect to social media use by one or more Members of Council is addressed through the procedures of the Code of Conduct Bylaw.

4. INTERNAL/EXTERNAL COMMUNICATIONS

- a. Report recommendations and information briefs are the formal means of communication between administration and Council. Clear, concise and relevant reports provide members of Council with the information they need to make decisions on municipal policies, programs, services and initiatives.
- b. Public announcements must be distributed concurrently to Council, except in urgent situations affecting public health, safety or danger to persons and property.
- c. The Chief Administrative Officer is the sole employee of Council and is the primary contact for all inquiries by members of Council.
- d. The Mayor is generally the Town’s primary spokesperson, unless another member of Council is designated by the Mayor or Council.
- e. Committee Chairs are normally the chief spokespersons for matters dealt with under their Terms of Reference.
- f. The CAO is the operational and administrative spokesperson.
- g. Inquiries regarding matters typically reserved for closed meetings are always referred to the Chief Administrative Officer without comment or reference to confidential matters.
- h. Responses to media inquiries for interview or other official response are coordinated between Administration and the Mayor on a case-by-case basis, with reasonable opportunity for Elected Officials or the CAO to respond accurately to questions, in line with existing policies and public information.

5. BRANDING, LOGOS AND IMAGERY:

Branding, logos, coats of arms and other related imagery is used in Communications in line with the *Logo and Coat of Arms (Branding) Policy*, as amended.

6. VIDEO RECORDING AND LIVESTREAMING OF COUNCIL MEETINGS:



- a. Open Meetings of Council held in Council Chambers or other venues may be broadcast and video recorded in an effort to promote transparency, public participation and access to municipal decision making.
- b. Any Council meetings or portions of Council meetings closed to the public in accordance with section 197 of the *Municipal Government Act* will not be broadcast or recorded.
- c. The official record of Council meetings shall be the written minutes. The keeping of a video recording of a Council meeting or content therein shall in no way detract or undermine the position of approved minutes as the official record of Council decisions.
- d. The Town of Nanton will make every reasonable effort to ensure that live streaming and video recordings are available to the public. However, there may be situations where due to technical difficulties the live streaming and video recordings may be unavailable or delayed. Meetings will not be cancelled, postponed or delayed due to technical issues with live streaming or recording of meetings.
- e. Signage shall be posted to ensure that presenters and members of the public are aware that all Open Meetings of Council are being broadcast, recorded and made available over the internet.
- f. It is intended that the standard camera position will only provide vision of the members of Council who are present at the meeting and those members of administration and the public who are addressing Council at the meeting.
- g. Recordings may be accessible to the public on the Town's website or social media page until such time as it is replaced by the next meeting's recording.
- h. Original unmodified recordings will be classified, stored and retained on a secure server based in Canada for the time period stated in section (g) above, unless this policy is superseded by amendments to the Town's Record Retention Bylaw.
- i. Council meetings are a public forum of statements, questions and answers. Opinions expressed and statements made during a Council meeting are those of the individual making them, and not those of Council. Unless set out in a resolution of Council, Council does not endorse or support the views, opinions, standards, or information that may be expressed by individuals at a Council meeting and which may be contained in a recording.

It is possible that statements could be made which may be regarded as offensive, defamatory, incorrect or contrary to law and may be the subject of potential liability. As the broadcasting and publishing of recordings of meetings increases the potential audience, potential risks may also increase.

Accordingly, the Chair has the discretion and authority at any time to direct the termination or interruption of the live streaming and recording of the meeting if they consider it prudent or advisable to do so. Such direction will only be given in exceptional circumstances.

- j. The Chair may:



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- direct the Chief Administrative Officer to terminate or interrupt the recording of a Council Meeting if they consider it advisable to do so due to content that is deemed inappropriate; or
 - direct the Chief Administrative Officer to remove recordings or portions of recordings from the Town's Website where they consider it advisable to do so due to content, they deem inappropriate to be published.
- k. Inappropriate material as referenced in section (j) considered to be inappropriate may include, but is not limited to, material that may:
- be false or misleading communication which damages the reputation of another individual or organization;
 - infringe copyright;
 - breach the privacy of an individual or unauthorised disclosure of the personal information of an individual;
 - be offensive;
 - constitute discrimination;
 - constitute hatred of a person or group of people and is likely to offend, insult, humiliate or intimidate;
 - disclose confidential or privileged information;
 - otherwise violate the Town's Communications Policy
- l. The Chief Administrative Officer or designate has authority, in consultation with the Mayor, to permanently or temporarily remove from the Town Website recorded or posted meeting material that is subsequently deemed or found to be considered inappropriate which may include, but is not limited to, material that may:
- be false or misleading communication which damages the reputation of another individual or organization
 - infringe copyright
 - breach the privacy of an individual or unauthorised disclosure of the personal information of an individual
 - be offensive
 - constitute discrimination
 - constitute hatred of a person or group of people and is likely to offend, insult, humiliate or intimidate
 - disclose confidential or privileged information
 - otherwise violate the Town's Communications Policy.
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- m. The rationale for this action in section (l) shall be explained to Council at a subsequent Closed Meeting.
- n. Unless otherwise indicated, copyright to the recordings of meetings made available on the Town's Website is owned by the Town of Nanton. Permission is granted to produce or reproduce the recordings posted on the website or social, or any substantial part of such recordings, for personal, non-commercial, educational and news reporting purposes only, provided that the copied material is not modified or altered and ownership of the material is attributed to the Town.
- o. For certainty, no person may use the recordings for commercial activity, political party advertising, election campaigns, or any other politically partisan activity. Unless expressly authorized herein, no part of the recorded materials posted on the Town's Website may be reproduced except in accordance with the provisions of the Copyright Act, as such Act

may amended or replaced from time to time, or with the express written permission of the Town.

- p. For reasons of confidentiality and legislative compliance, contracted service providers or other third parties that are in attendance to produce live broadcasts and recorded meetings must terminate or suspend the broadcast and leave Council Chambers with other public attendees once Council has recessed the Open Meeting to hold a Closed Meeting. It is expected that the majority of livestreams or recordings will not resume for final business and adjournment in those circumstances.
- q. Physical attendance by the public for the reconvening of the Open Meeting after a Closed Meeting will not be impacted. Online attendees can inquire if any resolutions were passed after resumption by contacting the Town Office or reviewing resulting minutes.
- r. Regular Meetings and standalone Committee of the Whole meetings are the Town's priority for livestream events and recordings. While always accessible to the public in-person, livestreams and video recordings may not be a standard expectation, for logistical and scheduling reasons, for other Committees or the Municipal Planning Commission.
 - Municipal staff require no less than one week's advance request from the Mayor or a Committee Chair if they wish a particular Committee or Municipal Planning Commission meeting to be livestreamed as additional preparations are required, including but not limited to, additional staff being present to prevent the business on the agenda becoming secondary to the logistics of the meeting being livestreamed. Livestreaming must not become a reactive or haphazard process.

7. REVIEW:

This policy should be reviewed at least once during every term of Council for prospective update, revision or renewal.

THIS POLICY WAS CONSIDERED AND ADOPTED BY COUNCIL ON APRIL 4, 2022
BY RESOLUTION NO. 12 – 127 – 22/04/04

SUPERCEDES: Policy No. 11 - 250 - 20/10/05; Video Recording and Livestreaming of Council Meetings
Policy No. 12 – 50 – 19/02/04; Communications, Correspondence & Social Media

MAYOR

Date

CHIEF ADMINISTRATIVE OFFICER

Date



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