

# New Mills Town Council (NMTC)

## WhatsApp Policy



### 1. Purpose

The purpose of this policy is to set clear rules and guidelines for the use of WhatsApp within New Mills Town Council (NMTC). This policy ensures compliance with legal requirements, including data protection regulations, and aligns with the professional standards and community values of NMTC.

### 2. Scope

This policy applies to all NMTC councillors, employees, volunteers, and any authorized individuals participating in NMTC WhatsApp groups or using WhatsApp for council-related communications. It covers all types of messages, including text, images, video, and voice notes exchanged within NMTC-managed WhatsApp groups.

### 3. Legal Basis and Compliance

- The Data Protection Act 2018 and GDPR regulations to ensure lawful, fair, and transparent handling of personal data.
- The Freedom of Information Act 2000, ensuring transparency in public body communications.
- To be used in conjunction with other NMTC policies relating to standards and conduct.

### 4. Formal Decision-Making

WhatsApp groups are for informal discussion and information sharing only. No formal decisions will be made within these groups. All formal decision-making must take place during Full Town Council (FTC) meetings and be properly recorded in meeting minutes. Any discussions in these groups that relate to council business may be subject to Freedom of Information (FOI) requests.

### 5. Approved WhatsApp Groups

Only approved NMTC WhatsApp groups may be used for council-related communications. NMTC Administrator will be an officer for approved groups, and members will be added and removed as part of the on boarding and off boarding process. A list of current approved groups is provided in Appendix 1.

## 6. Acceptable Use

- **Professional Conduct:** All communications must be respectful. Discriminatory, harassing, or offensive language will not be tolerated.
- **Relevant Content:** Discussions must be limited to NMTC business. Off-topic conversations are not allowed.
- **No Endorsements or Advertising:** Commercial or political advertisements or endorsements are prohibited.
- **No Confidential Discussions:** WhatsApp should not be used to discuss sensitive council matters such as personnel issues, legal concerns, or personal data.

## 7. Data Protection and Privacy

- **Lawful Basis for Processing:** Personal data shared in WhatsApp groups must comply with data protection laws. Members must be aware that their phone numbers are visible to other group members.
- **Limited Sharing:** Information shared in these groups should not be distributed outside the group without consent.
- **Consent:** Members must provide explicit consent to be added to groups, and they may revoke this consent at any time.
- **Security:** WhatsApp encryption should not be considered completely secure. Confidential matters should be handled via more secure channels.

## 8. Etiquette and Conduct

- Limit messaging to reasonable hours (e.g. 8 AM – 9 PM) unless it is an emergency.
- Avoid spamming and ensure messages are relevant and necessary.
- Discriminatory language or inflammatory behaviour may result in removal from the group.

## 9. Record Keeping and Auditing

- **No Formal Decisions via WhatsApp:** Important decisions, especially those involving council funds or resources, must be made during formal FTC meetings and documented in official minutes.
- **FOI Requests:** Members must understand that all WhatsApp communications related to NMTC may be subject to FOI requests and could be disclosed if necessary.

## 10. Breaches of Policy

- **Minor Offenses:** Minor breaches, such as off-topic messages or messaging at inappropriate times, will result in a warning from the group admin.

- Major Offenses: Severe violations, such as sharing confidential information or discriminatory behaviour, will result in removal from the group and possible further disciplinary action by NMTC.

## **11. Legal Enforcement and Liability**

- NMTC reserves the right to remove individuals from the group for policy violations. Serious cases may be referred to relevant authorities.
- NMTC is not responsible for damages arising from individual misuse of WhatsApp. Members are personally accountable for the content they share.
- WhatsApp is a third-party platform, and NMTC does not control its security features or guarantee confidentiality.

## **12. Review and Amendments**

This policy will be reviewed annually or as needed based on legal or council requirements.

Agreed by New Mills Town Council on [Date].

**V1 Drafted April 2025**

## **13. Appendix 1: Current NMTC WhatsApp Groups**

### **1. NMTC Councillors Group**

- For informal discussion between NMTC councillors.

### **2. Cllrs & Clerk NMTC Group**

- For focused informal information sharing between NMTC councillors and the Town Clerk.
- Used to raise awareness and share confirmed information without discussion.
- To facilitate council actions, such as responding to resident queries.
- To share polls for councillor availability and consideration of options.
- The Town Clerk may seek informal councillor approval for time-sensitive council expenditure or other urgent decisions, which may require formal approval at the next FTC meeting.
- Messages should be restricted to the Town Clerk's working hours unless the matter is urgent or an emergency.

### **3. Personnel & Clerk NMTC Group**

- For focused informal information sharing between committee members and the Town Clerk.
- To set a dates for committee meetings.

### **4. Chair & Clerk**

- For focused informal information sharing between Chair and the Town Clerk.
- To co-ordinate meetings and communications for council members.

### **5. NMTC TH/Parks Group**

- For focused informal information sharing between NMTC Officers at Town Hall and Park Department.
- To facilitate council actions, such as responding to resident queries.
- Staff are not expected to respond to messages outside of working hours.

### **6. NMTC HLH Group**

- For focused informal information sharing between Clerk, NMTC Staff and Volunteers working at or on events at High Lea Hall.
- To facilitate council actions, such as stock requests or event co-ordination.
- To organise shift cover or make charges to working rotas.