

Communications Policy

November 2020



Mackenzie
DISTRICT COUNCIL

Communications Policy

REVISION HISTORY

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Sponsor:	
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1. Purpose

Communications with the public, iwi, partners, and stakeholders is a major part of Council’s activity. Mackenzie District Council employs a wide range of communication channels, and will actively explore new communication channels to ensure we continue to deliver messaging as efficiently and effectively as possible.

- In all communications, Mackenzie District Council staff, elected members and contract representatives will apply the highest possible standards, taking into account the following:
- All communications will be clear, simple and accessible;
- Formal, mandatory communications will comply with all statutory obligations;
- All communications will express fair, unbiased and politically-neutral information;
- All communications will be accurate and complete, based on substantiated facts and expressed consistently with those facts so the target audience may make a full and proper assessment of the subject matter;
- When appropriate the communication must be attractive to the audience (within Mackenzie District Council Brand Guidelines) to ensure it can effectively achieve its desired purpose;
- Communication resources (financial and staff resources) must be applied effectively and efficiently and for legitimate reasons;
- Communication activity and channels will be selected based on their effectiveness in achieving the communication goals, and Council will not favour or endorse any specific channel or provider over others (for example, Council will not offer exclusivity to any member of the media).

2. Scope

This policy applies to any communication by an elected member, an employee or officer of Council in the following circumstances:

- Where the Council meets the cost of that communication;
- Where the person making the communication does so in an official capacity on behalf of the Council or a Community Board.

The policy applies to mandatory and discretionary communications, communications in the Council’s own publications, the news media at large (print, radio, television, online), Council- funded advertisements, and other forms of publicity, electronic (website, social media and email) and hard copy publication. Examples of communications include pamphlets/flyers, posters, radio (advertisements, notices, interviews), newspaper (advertisements, advertorial, column), Council newsletters, media releases and media conferences, educational material, speeches and presentations, website and social media channels.

Consultation is addressed in the Mackenzie District Council Significance and Engagement Policy.

This policy applies to all Council-related engagement with media companies and operators by an elected member, an employee or officer of the Council. This policy does not apply to normal day-to-day correspondence between elected members and their constituents, or using their own resources, which are conducted according to the current version of the elected members' Code of Conduct. The exception to this is during a pre-election period (see Principles 9, 10, 11 and 12 of this policy).

3. Policy

3.1. Responsibility

Effective and efficient management for Council communications activities is the responsibility of the Chief Executive. Operational management is delegated to the Information and Engagement Manager.

Communication contains an element of risk. Where risk or the potential for risk is identified, staff, contractors or elected members should alert the Communications Advisor and Chief Executive to any matter likely to require professional advice. Quality control, editorial policy and editorial supervision are the ultimate responsibility of the Chief Executive.

Council communications should be politically-neutral and for that reason the Chief Executive will (after consulting elected members and operational staff) make final decisions on formal publications.

3.2. Spokesperson

Elected members and the executive team share different elements of the communications function. For example, an elected member is accountable for a decision or action of the Council, community board or committee. The Mayor, Community Board Chair, or elected members are encouraged to act as spokesperson in this instance.

Use of a wide range of spokespeople is encouraged, and the person (manager, employee, and contractor) with the best expertise in a matter may act as a spokesperson for the Council. All media interviews (involving staff and contractors) and press releases will wherever possible be coordinated, facilitated and approved by a member of the communications team.

As a courtesy, elected members are asked to advise the Chief Executive and Communications Advisor of media interviews prior to publication or broadcast (or as soon as possible afterwards), particularly if the Council is likely to receive additional questions on the basis of the interview.

- All media enquiries should be referred to the Communications Adviser, who will co-ordinate the response and notify appropriate staff and elected members.
- Staff and contractors are required to notify the Communications Advisor of any approach by media.
- When a staff member or contractor is approached by media and has not been approved to act as spokesperson, then the Communications Advisor or Chief Executive should be consulted before any comment is made.

- Council staff and contractors should only comment if they are comfortable with the subject and fully appraised of the facts, and aware of any possible risk.
- Where accurate and complete answers cannot be facilitated immediately, or where a high degree of technical information is involved, or where there is reputational risk to Council, the media can reasonably be asked to wait for an agreed time and provide questions/requests in writing for clarity. Where significant administrative effort and collation is required consider referring the enquiry as a request under the Local Government Official Information and Meetings Act 1987 (LGOIMA).
- Requests for official information should ideally be made in writing (email is acceptable), be clear and specific, and notified to the Records Advisor.
- Key Council stakeholders, including the Mayor, Chief Executive, Community Board and Committee Chairs, will be kept informed of media approaches where appropriate.
- Where there are potential liabilities or reputational risk is identified, the Communications Advisor will advise the Chief Executive.
- All requests for photo or filming opportunities should be discussed with the Communications Advisor.

3.3. Media Relations

In the interests of providing ratepayers, residents and visitors with unbiased, politically-neutral and fair information Council will not favour or endorse any specific channel or provider over others.

- All press releases will be released to all members of the media at the same time.
- If there is a need for an early release, then such releases may be embargoed but issued to all members of the media at the same time.
- Council will not offer exclusivity to any member of the media.
- Council will not enter into negotiations with any member of the media at the exclusion of all others.

3.4. Principles

The following principles are drawn from 'Good practice for Managing Public Communications by Local Authorities (2004)' published by the Controller and Auditor-General | Tumaki o te Mana Arotake.

PRINCIPLE 1

The Council can lawfully spend money on communications to meet a community's justifiable need for information about the Council's role and activities.

- Communications are a necessary and legitimate expense.
- No communication should be undertaken without justification. The criteria is to establish a need for information, to ensure that communication method will be effective in reaching the target audience and ensuring the method is cost effective.
- Communications should be evaluated (annual resident and ratepayer opinion survey).
- Council has an obligation to communicate with those people affected by the Council's actions, which will necessarily require ascertaining who those people are.
- Consultation with the community is fundamental to the working of the Local Government Act 2002.

PRINCIPLE 2

Communications should be consistent with the purpose of local government and in the collective interest of the communities the Council serves.

- The Council is a corporate entity, with a statutory role and purpose. The role and purpose includes promoting the well-being of our communities and always acting in the collective interests of them all.
- Although communications might target only one part of the community, all communications should be justifiable as being in the collective interests of them all.

PRINCIPLE 3

Communications should comply with any applicable Council policies and guidelines.

THE COLLECTIVE POSITION

PRINCIPLE 4

Communications on policies and decisions must reflect the collective position of the Council.

- Council should always speak with ‘one voice’ representing the corporate or collective position. The exception to this is the elected member who has a contrary or opposing opinion as an individual.
- Any authorised spokesperson should be identified in their official capacity in terms of the matter being communicated, e.g. committee chairperson.
- Official communications must meet the Council’s, not the spokesperson’s, objectives and should only reflect the Council’s position, not the personal views, perspective or opinions of the spokesperson. Any elected member can, of course, state their personal position outside of an official Council communication.

PRINCIPLE 5

Communications on Council business should be clearly attributed to the Council as the publisher.

- All official printed Council communications must contain the Council’s corporate logo, e.g. advertisements, brochures, newsletter. All media releases are to be on the formal media release template.
- Communications meeting statutory obligations should state who has authorised its publication (usually the Chief Executive) and should state the statutory provision under which it is being published.
- From time to time the Council might become involved in a joint venture, for example with the Police, Department of Conservation, a community organisation, etc. In those instances, joint communications such as a media release or brochure should feature the logos of both organisations (refer to the Mackenzie District Council Brand Guidelines document). This also applies to the use of business sponsorship, for example advertising a community event. However, no business sponsorship will be entered into without the consent of the Chief Executive under consultation with the Communications Advisor. This is to address any potential associated risks or perception negativity.
- Commercial advertising to offset the cost of a communication to the community is appropriate in the case of politically neutral and/or educational content. No joint venture partner or sponsor should gain, or be perceived to gain, inappropriate commercial or political advantage. At no time will the Council relinquish editorial control or control over the placement or size of logos, slogans and other sponsorship references.
- Mandatory communications must be funded solely by the Council, e.g. Council Community Plan, statutory public notifications, etc.

STANDARDS OF COMMUNICATION

PRINCIPLE 6

Communications must be factual, accurate, complete, fair and politically neutral (for exceptions on neutrality see Principle 9).

- No claim or statement should be made that cannot be substantiated.
- A communication will be complete when it allows the audience to make a full and proper assessment of the subject matter.
- The audience should be able to distinguish fact from analysis, comment or opinion.
- The information will be politically neutral when it presents Council's collective position.

CONSULTATION AND PUBLIC DEBATE

PRINCIPLE 7

Communications about matters under consideration by the Council or that are a matter of public debate should be presented in an even-handed and non-partisan way.

- Communications about matters that will be the subject of a future decision by the Council should be distinctly different from those that follow a decision.
- Communications must avoid pre-determination, be objective, and state advantages and disadvantages.
- Communications must avoid representing the individual elected member's position or that of any political parties.
- Once a decision has been taken the emphasis should be on what has been decided and its implications for the council and the community.
- This principle applies whether the purpose of the communication is to satisfy Local Government Act 2002 requirements or otherwise.

PRINCIPLE 8

If engaging in public debate with an interest group or section of the community avoid Council funded publications.

- If communications are responding to publicity that is unfair, unbalanced or inaccurate, Council should use the new media for the purposes of putting the record straight, including a measure of rebuttal. Balanced written statements or media releases are appropriate, with the provision of an authorised spokesperson for interview if required.

COMMUNICATION BY MEMBERS

PRINCIPLE 9

Members' communications should be relevant to the role of the Council.

- Members are encouraged to contribute ideas and suggestions for publication through Council's communication channels.
- Final editorial and quality control will be the responsibility of the Communications Advisor in the first instance with final approval from the Chief Executive.
- Elected members should refer to Council's Standing Orders and elected members' Code of Conduct, with particular regards to conduct towards each other and the disclosure of Council information.

The following policy has been provided by the Auditor General | Tumuaki o te Mana Arotake (Good Practice for Managing Public Communications by Local Authorities, 2004. Ref 4.38):

- It is not appropriate for a member to use a Council newsletter or website to express views on a matter of Central Government responsibility if that matter has no direct bearing on Council activities.
- It may be appropriate (but only when undertaking formal consultation) for a member to use Council facilities to consult with the public. However, a member cannot use Council facilities to seek political support on an issue yet to be considered by the Council. References to, or the use of a logo or slogan of a political party or grouping are unacceptable.
- Members must not use Council communications for political or re-election purposes (see Principle 12).
- Staff protocols on the use of the Internet, email, and other communication facilities for personal purposes apply to members.

PRINCIPLE 10

Politically motivated criticism of another Member is not acceptable in any Council- funded communication, by a Member. Refer to the Code of Conduct.

- Members are free to use their own resources for such purposes.

MEMBERS' PERSONAL PROFILE

PRINCIPLE 11

Careful consideration and equity must be given to the use of Council resources to raise a Member's personal profile. Refer to the Code of Conduct.

- The Council has a responsibility to let the public know who the elected members are, such as through the council newsletter or website.
- Where appropriate, comments or photo opportunities should include the relevant elected members, for example comment by the Assets Committee Chair regarding roading developments, or Planning and Regulatory Committee Chair regarding building consent service improvements.
- Council may give communications a "human face" to make it more relevant and understandable to the audience, by including elected members' comments and/or photographs as appropriate.

PRINCIPLE 12

A local authority must not promote, nor be perceived to promote re-election prospects of a sitting member. The use of Council resources for re-election purposes is unacceptable and possibly unlawful. Refer to the Code of Conduct.

- Promoting the re-election prospect of a sitting member, directly or indirectly, is not part of the proper role of a local authority.
- Council communications facilities, including stationery, postage, internet, email, etc. cannot be used explicitly for campaign purposes.
- The Auditor General | Tumuaki o te Mana Arotake recommends communications, such as the Mackenzie Messenger, are suspended three months prior to the election. The publishing schedule will be adjusted accordingly during an election year.
- A breach of the Local Electoral Act 2001 can result in an election result being overturned.
- In some cases the use of Council resources, for example the reasonable market value of any materials applied in respect to electoral activity of the cost of printing or postage can be deemed "electoral expenses" (see Local Electoral Act 2001, section 104) but must be declared.



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