

OVERVIEW

This document contains the framework and principles for QLDC elected members, employees and contractors engaging with communications and advertising activity and the media.

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1 PURPOSE

Communications with ratepayers, residents and visitors is a major part of the Council's activities. The Council employs a wide range of communications, and is open to new future communication channels, as appropriate to the type of communication activity. More formal, mandatory communications may include notifying Council meetings, public consultation as outlined in the Council's *Significance and Engagement Policy*, or issuing a statutory public notification. Discretionary, less formal communications may include community events, online feedback surveys, press releases, social media posts, and Scuttlebutt (QLDC community newsletter).

In all communications, Queenstown Lakes District Council staff, elected members and contract representatives must apply the highest possible standards, whilst taking into account the following:

- > All communications must be clear, simple and accessible;
- > Formal, mandatory communications must comply with all statutory obligation;
- > All communications must express fair, unbiased and politically-neutral information;
- > All communications must be accurate and complete, based on substantiated facts and expressed consistently with those facts so the audience may make a full and proper assessment of the subject matter;
- > When appropriate the communication must be attractive to the audience (within QLDC Brand Guidelines) to ensure it can effectively achieve its desired purpose;
- > Communication resources (budget and staff) 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).

This policy has been written based on the principles and practice as outlined by the Controller and Auditor-General | Tumuaki o te Mana Arotake *Good Practice for Public Communications by Local Authorities* guidelines.

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 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 newsletter (Scuttlebutt, The Rec Report e-newsletter), press releases and media conferences, educational material, speeches and presentations, website and social media.

Consultation is addressed in the Queenstown Lakes 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 Communications & Engagement Manager, with Council communications coordinated and facilitated by the communications and engagement team.

Communications contains an element of risk. When appropriate, and staff, contractors or elected members should alert the Governance, Engagement & Communications Manager 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

In the Queenstown Lakes District Council, elected members and Council management 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.

A wide range of spokesperson 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 (staff and contractors) and press releases are best coordinated by the communications team or Governance, Engagement & Communications Manager to ensure they are conducted by someone media trained and approved to do so.

As a courtesy, elected members are asked to advise the Chief Executive and Governance, Engagement & Communications Manager 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.

- > Council staff and contractors should only make comment if they are comfortable with the subject and fully appraised of the facts.
- > Staff and contractors are required to notify the Governance, Engagement & Communications Manager, or Chief Executive, of any approach by media.
- > When a staff member or contractor is not confident when approached by media (either on subject matter or trained in engaging with media) or has not been approved to act as spokesperson, then the Governance, Engagement & Communications Manager or Chief Executive should be consulted before any comment is made.
- > Where accurate and complete answers cannot be facilitated immediately or where a high degree of technical information is involved 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 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 delegated Governance Advisor.
- > All media enquiries should be corresponded to the Governance, Engagement & Communications Manager, who can then notify appropriate staff and elected members.
- > Key Council stakeholders, including the Mayor, Chief Executive, Community Board and Committee Chairs, need to be kept informed of media approaches where appropriate.
- > Where there are potential liabilities there should be a file note made.
- > All requests for photo opportunities can be discussed with the Governance, Engagement & Engagement Manager, particularly if we are not aware of the purpose of the photograph.

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 must 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.
- > The Council need never offer exclusivity to any member of the media.
- > The Council will never enter into negotiations with any member of the media at the exclusion of all others.

3.4 PRINCIPLES

The following principles should guide all decisions on official Council communications.

LEGITIMACY AND JUSTIFICATION

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.

- > The 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 (refer to elected members' Code of Conduct).

- > 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 (refer to elected members' Code of Conduct).

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, Upper Clutha Tracks Trust, etc. In those instances joint communications such as a media release or brochure can feature the logos of both organisations (refer to How we look, Queenstown Lakes District Council Brand Guidelines). 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 Governance, Engagement & Communications Manager. 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. For example, Scuttlebutt, Civil Defence brochure, recycling, emergency number magnets. 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 press releases are appropriate, with the provision of an authorised spokesperson for interview if required.
- > Council resources such as Scuttlebutt should not be used to engage in public debate.
- > The exception to this is in response to incitement to commit a crime or acts of civil disobedience on the part of an interest group. In that instance it is reasonable to utilise a Council-funded publication.

COMMUNICATION BY MEMBERS

PRINCIPLE 9

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

- > Members are encouraged to contribute ideas and suggestions to communications such as Scuttlebutt, social media, and the Council website.
- > Final editorial and quality control will be the responsibility of the Governance, Engagement & Communications Manager 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 Infrastructure Committee Chair regarding roading developments, or Community & Services Committee Chair regarding library services 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 Scuttlebutt, 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.

OTHERS

Council surveys should meet acceptable standards in survey and market research (refer to Tatauranga Aotearoa | Statistics New Zealand's *Principles and Protocols for Producers of Tier 1 Statistics*).

4 ACKNOWLEDGEMENT

QLDC acknowledges the use of some materials for this policy from the *Good practice for Managing Public Communications by Local Authorities (2004)* published by the Controller and Auditor-General | Tumaki o te Mana Arotake.