

Frome Town Council Constitution

Chapter 23 WhatsApp policy

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Date Adopted: 25 March 2026
Date of Review: March 2027

A copy of this document is also available in different formats such as large print, audio or in a different language, please contact the office if this is required.

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1. Introduction

Frome Town Council recognises that WhatsApp is a widely used communication tool that can support quick and practical communication. However, it is not designed as a formal record-keeping system and presents challenges for transparency, information governance and data protection.

This policy sets out guidance for the appropriate use of WhatsApp in both internal (staff, councillors and volunteers) and external (residents, partners and community groups) contexts. It aims to ensure communication remains professional, lawful and compliant with the council's obligations under UK data protection legislation and local government law.

WhatsApp should therefore be used sparingly and primarily for practical or logistical communication. It must not replace official communication channels such as email, My Frome, formal meetings or recorded decisions.

2. Purpose

The purpose of this policy is to:

- Enable appropriate and effective communication through WhatsApp where useful
- Define boundaries for internal and external use, particularly in relation to data protection and information governance
- Ensure lawful, respectful and responsible communication in line with council policies
- Protect personal data and uphold the reputation of Frome Town Council

3. Scope

This policy applies to:

- All councillors, employees and volunteers of Frome Town Council
- Any third-party stakeholders (such as residents, contractors or community group leaders) included in council-managed WhatsApp groups

It covers:

- WhatsApp groups and communities (multi-way communication)
- WhatsApp broadcast lists or channels (one-way communication)
- Council communication conducted on either personal or council devices

4. Principles

WhatsApp can be useful for quick operational communication. However:

- It must not replace formal council communication channels
- It must not be used for decision-making or debating council business
- It must not be used to store official records
- It must comply with UK GDPR and data protection legislation

- Messages relating to council business may still be subject to Freedom of Information requests

5. Permitted Uses

5.1 Internal Use (Staff, Councillors and Volunteers)

WhatsApp may be used for:

- Lone working support or safety communication
- Sharing logistical or operational updates for events and activities
- Quick coordination between staff or councillors
- Informal coordination related to council activities or volunteering

WhatsApp must not be used for:

- Decision-making or policy discussions
- Reaching consensus outside formal meetings
- Sharing personal, sensitive or confidential information
- Replacing formal communication channels such as email, reports or meeting minutes

Councillors must not use WhatsApp groups to discuss council business in a way that could amount to collective decision-making outside properly convened meetings.

5.2 External Use (Residents and Community Members)

WhatsApp may be used for:

- Community engagement such as event updates or volunteer coordination
- Sharing alerts or updates through broadcast lists or channels
- Coordination with trusted community partners or project groups

Where possible, broadcast lists or channels should be used instead of groups, as these provide greater privacy.

External WhatsApp communication must:

- Be opt-in only with clear consent
- Avoid sharing participants' phone numbers without permission
- Include clear information on how to leave or opt out

6. Group and List Management

6.1 Creation

Any council-related WhatsApp groups or lists must:

- Be agreed by a manager

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- Be added to the council's WhatsApp group register

Where staff or councillors are invited into external WhatsApp groups in a council capacity, these should also be recorded in the group register.

6.2 Group Administrator Responsibilities

Each group must have a designated administrator responsible for:

- Explaining the group's purpose and rules
- Pinning a welcome message outlining expected behaviour and usage boundaries
- Regularly reviewing membership and activity
- Removing members who leave their role or behave inappropriately

7. Conduct and Behaviour

All users must:

- Communicate professionally and respectfully
- Keep discussions relevant to the group's purpose
- Avoid messaging outside normal hours unless urgent
- Not share screenshots or forward messages outside the group without permission

External groups

Moderators may remove content or members where necessary.

Frome Town Council does not tolerate:

- Harassment or abusive behaviour
- Misinformation or spam
- Offensive or discriminatory language
- Targeting of individuals
- Sharing confidential information

Any behaviour that does not align with the council's values may result in removal from the group.

Frome Town Council groups are for defined purpose only – off-topic posts may be removed

8. Political Content

Council-managed WhatsApp groups must not be used for party political campaigning, promotion of candidates, or lobbying related to elections or referendums.

9. Data Protection and Privacy (UK GDPR)

The council processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Internal Use

- Personal or confidential data must not be shared
- Phone numbers are visible to group members – explicit consent must be obtained before adding individuals

External Use

- Consent must be obtained before adding individuals to a group
- Broadcast lists are preferred as recipients cannot see each other's numbers
- Clear opt-out instructions should be provided in every pinned or welcome message

Any data breach, such as sharing personal information without consent, must be reported immediately to the Town Clerk or Data Protection Officer

10. Freedom of Information and Record Keeping

Information relating to council business may be subject to the Freedom of Information Act 2000 regardless of where it is stored, including on WhatsApp. Because WhatsApp is not a formal records system, it should not be used for storing important council information.

Formal decisions, consultations and key discussions must always be recorded through official channels such as:

- council meetings
- minutes
- reports
- official correspondence

If WhatsApp is used to arrange a meeting or event, outcomes should be recorded elsewhere.

11. Security

Anyone communicating on behalf of the council must:

- Use secure devices
- Enable two-factor authentication where possible
- Keep apps and operating systems up to date
- Avoid using public Wi-Fi for sensitive communication

If a phone with council WhatsApp access is lost or compromised, the Town Clerk must be notified immediately.

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12. Leaving or Changing Roles

Staff, councillors or volunteers must be removed from council WhatsApp groups when they leave their role or change responsibilities.

External groups should also be periodically reviewed to ensure membership remains appropriate.

13. Breaches of Policy

Failure to follow this policy may result in:

- Removal from council-managed WhatsApp groups
- Disciplinary action for employees
- Referral to the Monitoring Officer for councillors
- Investigation and potential reporting to the Information Commissioner's Office (ICO) where a data breach has occurred

14. Policy Review

This policy will be reviewed annually, or sooner if legislation or council requirements change.

Questions about this policy should be directed to the Town Clerk.