## Sending the **right** message



# CaerphillyComms

CCBC Communications & Engagement Strategy 2019 - 2022



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This publication is available in Welsh, and in other languages and formats on request. Mae'r cyhoeddiad hwn ar gael yn Gymraeg, ac mewn ieithoedd a fformatau eraill ar gais.

## WHAT IS THIS DOCUMENT?

This Communications Strategy has been developed to help define the way Caerphilly County Borough Council engages with its residents, partners, businesses and all our other key audiences.

As a council, we're committed to delivering quality, value for money services for Caerphilly county borough residents. The effectiveness of how we deliver our vision is determined, to a significant extent, by the quality of our communications and engagement.

All aspects of our communications and engagement can have an impact on the council's work and reputation. This strategy outlines the approach we will take to ensure our communications and engagement activity is fit for purpose and helps to achieve our vision.

It also defines how we as an organisation will listen and respond to what our audience is telling us in return.

The strategy sets out the principles of how we will communicate with openness and transparency, in a simple, non-technical way that people will be able to understand.

It also sets out the various communication channels and tools we will use to reach as many people as possible with our key messages.



## A DIFFERENT APPROACH...

Local Government is facing significant financial pressures, which are likely to increase over the next few years, therefore the scope of the authority's communications activity may be limited in comparison to previous years, but our challenge is to find new, innovative and cost-effective ways of doing things differently in the future.

The communication landscape has also changed dramatically over recent years and the old, outdated 'SOS' approach ('send out stuff') is simply not good enough in the 21st century.

We must engage in a meaningful way with our audiences using a wide range of communication channels and techniques (both digital and traditional) in order to foster trust and confidence in the organisation.

Our approach needs to be more 'human' and conversational, which better reflects the tone and style of modern social media and digital communication.

Rather than being driven by the demands of the organisation in an ad-hoc, reactive manner, we need instead to adopt a strategic, campaign-based approach to our communications which is aligned to the key priorities and aspirations of the council.

We also need to change the tone of our messages so that our residents are aware of the difficult decisions that lie ahead. Some of these decisions will be unpopular and we will be forced to deliver services in a different way – or not at all. Therefore it is important that our community understands the reasons behind this. We need to address misconceptions, challenge misinformation and help 'set the record straight' whenever we can.

## AN EXCITING NEW AGENDA

As well as the challenges highlighted above, there are also a number of exciting opportunities for the authority to deliver services in a new way in future and effective communications needs to be a key part of this process.

The Cardiff Capital Region City Deal will bring major opportunities for investment and employment to the Caerphilly county borough and it is vitally important that CCBC is seen as a key partner in this exciting new venture. We need to communicate the importance of this partnership to our communities and highlight the benefits it will bring to our area in the future.

The digital landscape is also changing rapidly and there are a number of new and exciting opportunities to do things differently in terms of communication, engagement, customer interaction and service delivery. The Communications Team need to be at the forefront of this agenda.

## FOREWORD BY THE LEADER

"I firmly believe that we are an excellent local authority which has developed a reputation for delivering effective services to all sections of the community from the 'cradle to the grave'.

We need to celebrate our success, promote our good work and ensure that we listen to the community, so that we can adapt to their ever-changing needs. It is also important that we protect and promote our reputation at every opportunity. Therefore it is critical that we have a robust Communications Strategy in place which provides clear focus and direction for the authority over the next three years and beyond.

In addition, the way we communicate as a society is also rapidly changing and we are seeing a greater shift towards digital and social channels. We must keep up with this pace of change and ensure that our communication and engagement activity reflects these emerging trends.

That said, we must also ensure that we take an inclusive approach to the way we communicate. Therefore our communication activity will be tailored to meet the diverse range of needs and abilities of all the people within our community.

This Communication and Engagement Strategy will ensure that we have a planned and well thought out approach to our communication activity in future. It will also ensure that the team has clear direction and purpose so that it can support the needs of the organisation at every level.

We have an award winning Communications Team who have helped play a key role in supporting the organisation through some very difficult times over recent years.

This document is a blueprint for our commitment to communication in the future and will underpin the team's work going forward."

**Cllr Dave Poole** Leader of Council



## INTRODUCTION

Caerphilly County Borough Council is committed to providing a consistent, innovative and cost-effective communication service in order to keep residents and other key stakeholders informed and engaged, as well as helping to improve our reputation.

The council wants to ensure that its priorities, values and ambitions are communicated to, and understood by, all our key stakeholders including our residents, our workforce, our partners and the local businesses community

One of the council's greatest assets is our reputation - our good name and the way people perceive us. Communication plays an important role in both protecting and promoting an organisation's reputation. Establishing and maintaining our reputation helps builds trust with the community and builds confidence in the authority.

In terms of the wider context, Local Government in Wales is changing. Budgets are reducing, the workforce is shrinking and we will be required to deliver our services in a different way over the next few years.

This means that difficult decisions will need to be made and tough, unpopular choices are inevitable. As the organisation changes and responds to these pressures it is essential that we communicate effectively at all times.

In addition to this, the communication landscape is changing at a rapid pace. Social and digital has become the main way of communicating for many people, as well as being their main source of news and information.

It is important that we continue to build on our use of social media as a key tool to engage and converse with our communities - rather than broadcasting **at them**.

Effective communication and engagement is vitally important in helping to influence the behaviour and attitudes of our residents. Just by way of an example, we want people to recycle more and waste less; be fit and active; increase the use of country parks; travel more by public transport; be energy efficient etc - these are just a few behaviours that can be influenced by communication and delivering clear messages.

Effective communication and engagement will help us clearly explain and deliver the organisation's key priorities. It is important that we continuously review, refresh and improve the way that we communicate to ensure we are sending and receiving the right message at the right time

## REACH

We will use a wide range of channels to communicate with our audiences. This includes social, digital and traditional methods.

## ENGAGE

We will ensure that our communication is timely, relevant, informative and uses plain English. We want to create engaging content for all our

## CONVERT

We will work hard to change behaviours and attitudes by providing relevant information so that our audiences are able to make informed and considered choices.

## WHO WE ARE & WHAT WE DO

The Communications Team is based in Penallta House, Ystrad Mynach (with Print and Graphic Design functions based nearby in Tredomen House).



The team provides professional communication support to the whole organisation and is able to offer clients a range of bespoke services across the following areas:

#### **MEDIA MANAGEMENT**

We work hard to promote and protect the council's reputation, as well as keeping our residents informed. We pride ourselves on applying a dynamic, forward thinking approach to proactive and reactive media management. All incoming media enquiries must be handled by the Communications Team who will log and respond with an agreed corporate response. (See Media Protocol – Appendix 1)

#### **ADVERTISING**

In line with statutory requirements, we offer an accurate, on time and professional service. We ensure advertising services are fully compliant by offering advice and guidance where necessary and secure the best discounts through effective negotiation. All the authority's paid for advertising must be placed via the Communications Team who will oversee all aspects of the booking and placement process.

#### **CITIZEN ENGAGEMENT**

Effective consultation and engagement promotes two way communication, which ensures residents are able to influence the way we shape and deliver our services.

Any consultation and engagement activity undertaken by the authority must be done in conjunction with the Communications Team and the Policy Unit to ensure we comply with agreed standards.

#### **EVENT MANAGEMENT**

Showcasing the council's services with a professional approach and careful attention to detail, we create a lasting impression when planning corporate events.

The Communications Team are a key point of contact for any corporate events such as openings, launches, Ministerial & Royal visits, VIP activities etc.

#### **GRAPHIC DESIGN**

Creating professional, efficient, imaginative, cost effective and trustworthy design solutions to assist council services in targeting their audiences and help customers identify with the CCBC brand. All the authority's design requirements are to be undertaken by the in-house team to ensure we comply with agreed standards (eg Welsh Language, corporate branding, equalities etc).

#### INTERNAL COMMUNICATION

Promoting and fostering internal engagement by adopting a whole authority approach through the use of effective internal communication channels. The Communications Team facilitate a range of internal communication activities to keep the workforce engaged and updated.

#### CAMPAIGN MANAGEMENT

Creating effective communications campaigns require clarity, creativity and the highest possible attention to detail – all of which we offer with a tailored service to suit all budgets. The Communications Team can offer expertise in delivering effective integrated campaigns using a range of communication channels - both owned and earned.

#### **CRISIS COMMUNICATIONS**

The team work closely with the senior leadership of the organisation and other partner agencies in emergency situations to ensure all communication is co-ordinated effectively.

## **PRINT SERVICES**

Delivering high quality print services to meet deadlines, we offer a full range of printing capabilities using the latest printing technology combined with a skilled and dedicated team. All the authority's print requirements are to be undertaken by the in-house team to ensure we comply with agreed standards (eg Welsh Language, corporate branding, equalities etc).

#### **SOCIAL MEDIA**

Building an effective social media network with thousands of followers, we have been successful in creating a far reaching two way channel of communication. Developing an engaging strategy has allowed us to position the council as one of the leaders in Wales. The Communication Team are responsible for the authority's main corporate accounts and can also advise other departments about social media use.

## **TWINNING**

The Communications Team is responsible for maintaining and fostering the long-standing partnership links with Ludwigsburg (Germany) and Pisek (Czech Republic).



# OUR COMMUNICATIONS OBJECTIVES

Through effective communications and engagement, our key objectives are to:

- Inform and engage with residents, businesses, visitors, partners and other stakeholders about the council's aims and key priorities, the services it provides and how they can get involved in shaping decisions.
- Maintain a strong and recognisable council brand and identity utilising the strategic communications campaigns to effectively do this.
- Promote and uphold the council's reputation.
- Ensure that our workforce is involved and engaged through good internal communications, so that they are well placed to represent and champion the council in the community.

## HOW WILL WE DO THIS?

The communications landscape is ever changing, and to continue to innovate, we will focus on the following:

- 1. Put in place a comprehensive communications strategy that provides clear direction for the council that's what this document is all about.
- 2. Further enhance our digital communications We want to create engaging content across a range of channels especially digital and social.
- 3. Less broadcasting and more 2-way communication and engagement Let's have a real conversation with real people.
- 4. Tailor our communications and engagement to maximise impact using insight to tailor activity to reach different audiences more effectively.
- 5. More focus on positive and proactive communication through a campaign model we do lots of good things that people would love to know more about.
- 6. Help our community understand local government, including our challenges Now more than ever it is important that the community are aware of the pressures facing public services and the need to do things differently in future.
- 7. Maintain a strategic approach to communications and engagement by focussing on the priorities contained in the Corporate Plan.

# OUR 'CRYSTAL CLEAR' COMMUNICATIONS COMMITMENT

As effective, professional communicators we will always strive to achieve best practice and deliver a clear, helpful and informative communications service for the whole organisation.

- Crystal Clear We are completely transparent and unclouded
- Crystal Clear We are straight to the point
- Crystal Clear We want to ensure residents/staff/Cllrs clearly understand their role and responsibilities
- Crystal Clear Our message is simple and delivered in Plain English / Welsh

Our Crystal Clear communications activity will help:

- 1. Set the record straight
- 2. Address misconceptions
- 3. Manage community expectations
- 4. Deliver difficult information and messages
- 5. Myth-busting

Our overall approach means that:

- We will always be open, honest, impartial and factual
- We will communicate in a timely manner with concise, up to date information
- We will avoid jargon wherever possible and communicate in Plain English
- We will engage and listen more not just broadcast as we want to encourage a two way flow of communication.
- We will always strive to ensure value for money in everything we do
- We will listen to feedback and seek insight to help improve the way we communicate
- We will embrace digital communication particularly social media but will not lose sight of the importance of more traditional channels too.
- We will continuously learn, develop and evolve in order to provide a more effective service
- We will be inclusive and accessible in our communication using languages and formats best suited to our audiences



## PRINCIPLES UNDERPINNING THE STRATEGY

We need to have a firm foundation, a set of agreed principles which are reflected in everything we do.

These should be the bedrock of our communications activity and act as a guarantee that our actions are sound and that they fit the values of the council.

#### **STAFF FIRST**

Staff should be well informed about issues which affect the organisation and impact upon them as employees. Being well-informed means they can participate fully in our drive to be an excellent council and an employer of choice. In all our communications activity we will endeavour to provide staff with access to information in advance of the media and the public. Only then can we demonstrate that our staff are valued as employees and ambassadors for the council.

## **GOOD COMMUNICATION IS EVERYONE'S RESPONSIBILITY**

Every employee is involved in communication activity whether formal or informal as an integral part of his or her role. Whether this involves internal or external communications, all employees need to take responsibility for ensuring they communicate clearly and effectively.

## EFFECTIVE INTERNAL COMMUNICATION DRIVES CULTURE CHANGE AND IMPROVES PERFORMANCE

Internal communications is not seen as an 'add on', an activity that is voluntary or a luxury when budgets are tight. Without it, we will not become the council we want to be.

## MANAGERS NEED TO BACK THEIR COMMITMENT TO COMMUNICATIONS

This requires action to break down any 'silo' mentality which may exist. A willingness to use directorate and divisional resources in a different way in order to maximise communication objectives.

## A CAMPAIGNS APPROACH TO COMMUNICATIONS

Our residents do not live their lives within organisational boundaries. In the course of a day, they may be a parent, a carer, a commuter, an entrepreneur and much more besides. They are unlikely to think of themselves as council 'service users' or 'customers'.

A strategic campaigns approach to our communications, that supports our corporate priorities, will help enable more focus on strategic activities and champion the organisation's objectives.

It will help give the organisation a clear voice - a strong narrative with a few overarching key messages, which are what the organisation wants residents, businesses and visitors to 'think' when thinking of Caerphilly County Borough Council.

#### **WEWILL:**

- Build campaigns with clearly defined audiences in mind, to ensure a sharper focus on customers and stakeholder groups, therefore increasing the relevance of the information they receive.
- Develop our campaigns using a series of communications activities with a common objective or theme, and design them with the aim of influencing the audience's perceptions or effect a desired behaviour change.
- Change the focus simply from communications outputs (press coverage, social media reach etc) to real benefits for the community.

The organisation will execute seven strategic communications campaigns each year, which have clearly defined links to the councils Corporate Plan, are fully evaluated throughout and support the seven key Cabinet Commitments.

The campaigns will be developed in line with the Government Communication Services' model, which advocates five clearly defined development areas; objectives, audience/insight, strategy, implementation/tactics and scoring/evaluation.

## THIS APPROACH WILL ALSO ALLOW US TO DEVELOP OUR CAMPAIGNS INTO:

- Being more digital and audience focussed empowering others to generate their own content
- Maximising the Communications Team's resources utilising the campaigns to strongly communicate the council's key messages
- Having solid in-built evaluation techniques to measure effectiveness and impact
- And create genuine change either through perceptions or actual behavioural change

The campaigns approach will develop a story for Caerphilly County Borough Council over the coming years - and help in building the council's 'brand' as a county borough that has much to offer.

The approach will work to complement the council's existing Place/Destination Marketing Strategy, which is delivered by a dedicated Marketing team based within the Communities directorate.

Place/Destination marketing refers to the activity an organisation carries out to differentiate itself from others and promote its unique characteristics, and is particularly used in encouraging increased tourism to an area. This form of marketing activity has clearly defined target audience demographics and often has increasing revenue as its primary aim.

The campaigns model supports this approach by striving to communicate seven key concepts that differentiate Caerphilly county borough and promote its unique characteristics - for example, that Caerphilly is a strong and vibrant place to do business and that it is a place that invests in its young people and future generations.

# DEVELOPING OUR INTEGRATED COMMUNICATIONS CAMPAIGNS FOR 2019-2023

Our communications campaigns for 2019/2023 will support the Wellbeing Objectives outlined in the council's Corporate Plan 2018-2023.

The campaigns will support our corporate priorities, help enable more focus on strategic activities and champion the organisation's objectives.

They are:

## 'IMPROVING... INVESTING... INSPIRING'

Supporting Wellbeing Objective number one - improving education opportunities for all

#### 'A GREAT PLACE TO DO BUSINESS'

Supporting Wellbeing Objective number two - enabling employment

## **'YOUR HOMES, YOUR FUTURE'**

Supporting Wellbeing Objective number three - addressing the availability, condition and sustainability of homes throughout the county borough, and provide advice, assistance or support to help improve people's wellbeing

## **'CONNECTING PEOPLE, CONNECTING PLACES'**

Supporting Wellbeing Objective number four - promoting a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impacts on the environment

## **'HEALTHY LIVES, HEALTHY SPACES'**

Supporting Wellbeing Objective number five - creating a county borough that supports a healthy lifestyle, in accordance with the Sustainable Development principle within the Wellbeing of Future Generations (Wales) Act 2015.

## 'CREATING CARING COMMUNITIES'

Supporting Wellbeing Objective number six - supporting citizens to remain independent and improve their wellbeing

#### 'THE CAERPHILLY CONVERSATION'

Supporting the work of the council's business transformation programme and engagement with residents around the council's Medium Term Financial Plan.

## DIGITAL BY DESIGN

Over the last decade we have seen a digital revolution. People are more connected than ever before and the way they search for and receive information and news has changed significantly as a result.

This strategy sets a clear ambition to drive forward a new approach to digital communication.

We will need to continually develop and build new ways of communicating and engaging with our audiences and stakeholders, to develop strong, enduring and mutually beneficial relationships.

## **OUR DIGITAL OBJECTIVES**

We will effectively manage our digital and social media channels by linking them to our strategic objectives and work streams.

Our main objectives will be to:

- Produce a Digital Contents Planner including key dates for national, local and council related information and initiatives. This will allow us to deliver timely and relevant messages to our target audience using our digital communications channels.
- Build a strong network of residents and stakeholders online to create strong social capital.
- Engage residents in a two-way conversation about our work and their views.
- Share partner and stakeholder messages(Schools, PSB, WG etc).
- Encourage staff and members to support, promote and take part in our online conversations.

- Develop a 'Digital Dashboard' to allow us to review and monitor the usage and effectiveness of our current digital channels. We would use this information to consider discontinuing those channels that are ineffective and to consider using alternative channels.
- Produce a monthly digital report/digest of what featured on our digital channels. What worked and what didn't.

#### **DIGITAL MEDIA AUDIT**

The Communications Team will audit all service area-managed social media channels to review access permissions, frequency and quality of posts. Identify additional services that would benefit from social media. Identify use of additional social media channels, e.g. Instagram, What's App, Pinterest, etc.

Look into place based community social media accounts, e.g. to support the Council's ambition of thinking digital by design and empowering residents to get online and support local communications and engagement on neighbourhood issues such as dog mess, anti-social behaviour or information about local services. It can be used to support Customer Services directly deal with complaints via our social media channels.

## HOW DOES THIS STRATEGY FIT IN WITH THE WIDER PICTURE?

This strategy does not exist in isolation. It is designed to complement and enhance a range of other key strategies that are being delivered across the organisation such as the council's marketing strategy, the Corporate Plan and Wellbeing Objectives as well as the Cabinet's Commitments.

#### **SUPPORTING CABINET'S COMMITMENTS**

The council's Cabinet has agreed a set of commitments and values for CCBC, so it is important that our communications activities are closely aligned to these principles.

#### **CABINET'S COMMITMENTS:**

- We will always do our best to protect jobs and services within the current challenging financial climate.
- We will build on CCBC's reputation as an innovative, high performing local authority.
- We will ensure we have an engaged and motivated workforce.
- We will always strive to ensure CCBC delivers value for money in everything it does.

- We will help protect the most vulnerable people in our society and make safeguarding a key priority.
- We will always welcome feedback and consider the views of residents, staff and other key stakeholders.

We will be open, honest & transparent in everything we do.

#### SUPPORTING CCBC'S STRATEGIC OBJECTIVES

The Local Government Measure 2009 requires all local authorities in Wales to set and publish a set of priorities called Improvement Objectives, however the introduction of the Well-being of Future Generations (Wales) Act 2015 (WBFGA) also places a legal requirement for public bodies to set and publish Well-being Objectives.

As there is a cross over between the two legislations, authorities (including CCBC) are treating the two requirements as one outcome, to publish one set of Well-being Objectives and the Wales Audit Office and Welsh Local Government Association (WLGA) have endorsed this approach.

The council's Well-being Objectives for 2018-2023 have now been agreed and these will have a key influence on the Communication Team's activities – particularly in terms of the 'Campaign' work that is planned over the next 3 years.

Our communications work will be aligned to these 6 key objectives and reflect what is being done to deliver these within the community

# IMPROVING INTERNAL COMMUNICATION

A lot of work is currently being done to improve internal communication and engagement across the organisation.

The authority recognises that effective and meaningful internal engagement can deliver significant benefits in terms of morale, productivity and a sense of building a 'Team Caerphilly' ethos.

We also recognise that our excellent workforce is our biggest asset and many CCBC employees live within the county borough, therefore they are valuable advocates and ambassadors for the authority.

Much work has been done to develop the Corporate Plan and Wellbeing Objectives, as well as the Cabinet's new Commitments, therefore it is appropriate that staff are encouraged to develop their own set of values and behaviours which fit in with and reflect the overarching corporate position.

The creation of a new values and behaviours framework for staff would be the 'last piece of the jigsaw' and will provide the organisation with a clear sense of purpose and direction at all levels.

## THE ROAD TO 2022

## **CCBC }}}2022**

Effective communication and engagement will be a critical element in the delivery of the council's business transformation programme.

The Communications Team plays a lead role in this transformation programme and a significant amount of work has been undertaken over the past two years as part of this agenda including:

**STAFF SURVEY -** A comprehensive staff survey was undertaken in 2017 and the feedback has been provided to employees in a number of ways (Intranet, email updates, printed summaries, team briefings).

**STAFF ROADSHOWS** - Six corporate staff roadshows for employees at all levels across the authority were held in the spring 2018. They followed on from a successful pilot held for staff from the Communities Directorate in 2016.

**AUDIT OF EXISTING INTERNAL COMMUNICATION CHANNELS** - An audit of existing internal communication methods across all Heads of Service has been undertaken.

**CCBC INTRANET** - A cross directorate working group was established in late 2016 to drive the development of a new staff Intranet to replace an old, outdated version. IT Services then developed a pilot Intranet site that was trialled and launched in 2018.

**BLOGS** – The Interim Chief Executive had already established a regular blog and these had been widely welcomed by staff as a way to receive updates and find out more about the real person behind the blog and not just the 'corporate line'. The Leader of Council and the rest of CMT are also now producing regular blogs and the next stage is to explore the use of video blogs.

**'ASK THE CHIEF EXECUTIVE' -** The initiative was launched in January 2017 to enable staff to pose a question, make a suggestion, raise a concern or provide feedback. This can be done online via a dedicated email address or by submitting printed 'postcards' for staff without access to a PC.

**CUSTOMER SERVICE STANDARDS** - The Customer Services Team developed a set of new customer service standards that are being adopted by all staff across the authority (not just customer services staff).

**CABINET COMMITMENTS** - The Communications Unit worked closely with Cabinet and CMT in 2017 on a key piece of work to develop a vision and a clear set of values for the organisation going forward.

## Next Steps.....

**STAFF NEWSLETTER** - It is recognised that the development of a new staff newsletter (printed and digital) would be a beneficial addition to our ongoing communication and engagement work – particularly for hard to reach staff.

**STAFF RECOGNITION AWARDS** - Staff reward and recognition (or lack of) was a key theme that emerged from the recent roadshows and via other feedback channels, therefore the council is keen to pursue the development of a new initiative to formally recognise staff across the organisation.

**GOV DELIVERY** - CCBC is currently using a widely recognised Granicus product called GovDelivery. It is primarily being used for external audiences at present (eg jobs, events, service disruption, traffic updates, school closures etc), but the product is equally effective for use in an internal facing way.

**PLASMA SCREENS** - There are a variety of different TV and plasma screens located at numerous council sites across the county borough. These include libraries, leisure centres, corporate receptions, staff rest areas in depots etc, but at present there is no over-arching strategy to ensure that there is consistency in the quality, frequency or timeliness of the information and messages that they display.



## EVALUATION AND MEASUREMENT

The Communications Unit, like other departments across the organisation, utilise Service Plans and the online monitoring tool Ffynnon to evaluate performance against a series of benchmarking standards.

It is these performance mechanisms which play a key role in measuring current performance and in setting aspirational targets and goals for improving the service and output provided by the Communications Team across the council.

An action plan has been developed to support this strategy which sets out key milestones In terms of our service delivery over the next three years. More detailed quarterly planners are developed to steer the team's workload and these are fed into the council's Corporate Management Team and the Cabinet's PDM meeting for consideration each quarter.

A focus on the importance of monitoring and evaluation should be at the heart of all work undertaken by the Communications Unit

## LEGISLATIVE FRAMEWORK

The Communications Team and its activities are bound by the Welsh Government's Code of Recommended Practice on Local Authority Publicity in Wales in both spirit and in letter.

We are also bound by the council's own constitution along with the various policies and procedures adopted by the organisation.

# WHO TO CONTACT FOR MORE INFORMATION

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