



Malin Head Community Association LTD.

Communications Policy 2021

This policy document has been drawn up with reference to the '[Guidance on Charity Communications](#)' from the Charities Regulator and should be read in conjunction with the *MHCA Information & Communications Technology (ICT) Policy 2014 (Reviewed & Revised 2021)* and the *MHCA 2021 Data Protection Policy*.

Designated Data Controller:

Document Prepared by:

Ali Farren (*Centre Manager*)

Róisín M Doherty

Table of Contents

1. Charitable Purpose	2
2. Purpose of Policy	2
3. Stakeholders	3
4. Responsibilities	3
5. Standards for Communication	4
6. Types of Communication	4
6.1 The Website	4
6.2 Social Media Platforms	5
6.3 Advertising – Posters & Flyers	6
6.4 Press	6
6.5 AGM	7
6.6 Workshops, Focus Groups & Questionnaires	8
6.7 Committee Meetings	8
6.8 Emails	8
6.9 Mail	9
6.10 Whatsapp	9
7. Responding to Stakeholder Communications -	10
7.1 Requests for Information	10
7.2 Calls to Action	10
7.3 Complaints	10
8. Communications in a Crisis	12
9. Publication of Policies & Procedures	13
10. Review & Revision Policy -	13
10.1 Record of Reviews & Revisions	13
10.2 Schedule of Reviews & Revisions	13
10.3 Approval & Adoption	13
10.4 Next Scheduled Policy Review	13

1. Charitable Purpose

To establish, promote and operate a community development programme, which will act as a focus and a catalyst for community development for the community at Malin Head and the surrounding areas, with a view to promoting their social, economic, and cultural welfare and general benefit and particularly to empower specific disadvantaged groups to effectively participate in a programme of personal & social development.

Subsidiary / Ancillary Objectives:

- To provide a resource centre and programmes aimed at encouraging and profiting, efforts, ideas, enterprises and creativity whether artistic or literary or otherwise and to further support the work of existing groups in the area and to enable voluntary groups to maximise their effectiveness by providing administrative backup, additional expertise and networking facilities
- To operate workshops and training schemes for the development of art, music, creative writing, culture and associated subjects and provide opportunities for promoting local talent and skills
- To encourage training in community development, leadership, organisational skills and social analysis for the benignity of the entire community and to establish support groups responding to local needs and problems.

2. Purpose of Policy

The Malin Head Community Association is committed to being open and transparent in all its dealings in order to ensure that we build and maintain the confidence of all of our stakeholders. Identifying all stakeholders and having a plan in place to ensure we communicate with them fully and effectively is an important function of good governance. This policy is designed to:

- **Help us achieve our overall organisations Charitable Purpose & Objectives**
- **Promote and further our Mission, Vision & values**
- **Raise awareness of who we are and what we do**
- **Improve communications with all stakeholders**
- **ensure that all stakeholders can communicate easily with us**
- **Improve stakeholder engagement and participation in the MHCA planning process**
- **Influence behaviours and perceptions where appropriate**
- **Increase transparency and ensure greater accountability and consistency**

3. Stakeholders

The Malin Head Community Association recognise stakeholders as being any individuals or groups of people who have a legitimate interest in the work of the association. MHCA stakeholders include:

- Beneficiaries – the people who benefit (directly or indirectly) from any services provided by the charity i.e. The People of Malin Head for whose benefit the charity was established.
- Members - including members of our various user groups and clubs
- Employees and volunteers including committee members
- Partner organisations and supporters
- Funders
- Donors & Sponsors
- Regulators
- Public representatives
- The general public

The MHCA holds a master stakeholder contacts list. The list is maintained and updated by the Data Controller (Ali Farren) in line with the MHCA Data Protection Policy & Procedures. For the purposes of GDPR the list does **not include information pertaining to individuals in their private capacity** but does include individuals professional or business contacts as well as those whose information is in the public domain such as local representatives.

The list records:

- The name of the group, organisation, business or title
- Address
- A primary contact Name
- Telephone Number
- email

The list is not shared publicly but may be subject to GDPR requests.

User groups and clubs are required to record, retain and maintain registration details including current contact information for their individual members as part of the MHCA registration procedure.

4. Responsibilities

The Centre Manager is the primary contact for the association and is responsible for managing the website, social media, day to day e-mail, telephone and postal correspondence with all stakeholders.

The chairperson is ultimately responsible for all Management Committee Communications. The Company Secretary & Minutes Secretary are responsible for day to day communications and the circulation of documentation.

5. Standards for Communication

All communications activity should:

- Reflect the associations stated values
- Use plain English
- Be clear but friendly
- Avoid stereotyping & derogatory collective terminology
- Use gender neutral terms where possible
- Avoid colloquialisms
- Be open and honest
- Avoid repetition and clichés
- Be relevant, accurate, sensitive & timely
- Enable meaningful engagement with stakeholders
- Recognise the importance and value of engaging with members, trustees and staff.
- Ensure that the MHCA listens to members, acts on information received when appropriate and provides feedback.
- Reflect the principles of confidentiality, Data Protection, Freedom of Information and other relevant legislation.

6. Types of Communication

The Malin Head Community Association communicates with its stakeholders in a variety of ways:

- The website
- Social media platforms – Facebook, Twitter & Instagram
- Advertising – Posters & Flyers
- Press – Advertisements, Press releases & Appearances / Interviews
- Annual General Meeting (AGM)
- Workshops and Focus Groups
- Emails
- Mail
- Committee Meetings
- Whatsapp

6.1 The Website

The official MHCA website, www.malinheadcommunity.ie is managed by **Made in Trenbania Ltd.** and the Centre Manager and Secretary have administrative access and are responsible for managing content.

The website features

- A feed link to the MHCA Facebook page with news updates and relevant posts.
- A section on upcoming events
- A contact us section where the public can e-mail the Centre Manager directly.
- Links to current policy documents and reports

6.2 Social Media Platforms

Social media platforms such as Facebook and Twitter are now the primary channels for communicating with stakeholders and promoting awareness of the MHCA, who we are and what we do.

Currently the public accounts are:

- Facebook: www.facebook.com/malinheadcommunity
- Twitter: twitter.com/malinheadcommun
- Instagram: www.instagram.com/malinheadcommunity/

Content is generally made up of news, events, photos and public information notices with links to the relevant MHCA or other official and relevant website pages. All social media accounts are managed by the Centre Manager. Administrative access is granted to the following for moderating purposes:

- **Facebook Admins:** *Ali Farren, Róisín Doherty, Collette O'Doherty & Robert Farren* – Can manage all aspects of the Page. They can publish and send Messenger messages as the Page, respond to and delete comments on the Page, post from Instagram to Facebook, create ads, see who created a post or comment, view insights and assign Page roles. If an Instagram account is connected to the Page, they can respond to and delete comments, send Direct messages, sync business contact info and create ads.
- **Facebook Editors:** *Nell Gallagher, Caroline Harley & Eamon Ward* -Can publish content and send Messenger messages as the Page, respond to and delete comments on the Page, create ads, see who created a post or comment, post from Instagram to Facebook and view insights.
- Twitter: *Ali Farren*
- Instagram: *Ali Farren*

The MHCA moderators adopt the following guidelines that employees and members must observe when participating in social networking sites. It is considered a breach of acceptable staff and member conduct to post on any public or private website or other forum:

- Anything that may harm the goodwill or reputation of the organisation or any disparaging information about the MHCA
- Any disparaging, discriminatory or harassing information concerning any employee, member or stakeholder.
- Any confidential information or intellectual property.
- Any private information relating to a member or employee.
- Moderators may remove any post that they consider inappropriate.

To allow for consistency and transparency the Centre Manager is primarily responsible for replying to direct messages received via social media accounts. The Communications standards as outlined in section 5 of this document apply equally to all forms of communication regardless of how informal they may be.

6.3 Advertising – Posters & Flyers

The MHCA advertises upcoming events on the main billboard opposite the entrance to the centre and by producing and circulating posters to local retail outlets including:

- Malin Head Post Office
- Mullins Shop
- Seaview Stores
- Farrens Bar

From time to time the association may distribute flyers or brochures to targetted groups such as the local primary schools or specific user groups. They may also be made available to interested parties from the above local retail outlets. The MHCA may occasionally (and only when it is deemed as appropriate) billet cars or distributes flyers through blanketed mail shots.

6.4 Press

Advertising - Advertisements are placed by the MHCA from time to time in one or more of the three main local newspapers:

- Inish Times (Weekly on Wednesday and online)
- Inishowen Independent (Weekly on Tuesday and online)
- Derry Journal, Inishowen Edition (Weekly on Friday and online)

Press Releases - From time to time the MHCA prepare press releases for major announcements or to promote the launch of a new programme or event. The following guidance should be followed when preparing a press release:

- **Headline** – Keep the headline short, simple and informative. A well-crafted headline should tell the story and grab the reader’s attention in just a few words. Writing succinct headlines is a skill and takes practice to get the message across in fewer than ten words.
- **First paragraph** – All the important information should be included in the first section. Reporters may only spend a minute scanning a news release – so identify who, what, why, when and where straight away.
- **Bullet points** – A busy news editor will scan a news release rather than read word by word. Using bullet points will help them pick out important information. Use bullets for facts, statistics and key messages.
- **Quotes** – People’s own words bring a story to life. Quotes are a great way to let a beneficiary or donor convey the impact an organisation, programme or event has made. It’s important, wherever possible, to attribute quotes to a person to ensure credibility and authenticity.
- **Call to action** – Depending on the nature of the story, including a call to action may be important. The objective may be to promote an event or a fundraising campaign or attract volunteers. Including information about this is vital to inspire action.
- **Proof reading** – Everyone makes mistakes and it can be hard to spot your own. There’s no substitute for getting someone else to read what you’ve written to check for errors. Don’t rely on spellcheck alone.

- **Contact details** – If a press release captures the news desk’s attention, they may want to know more. But if there’s no-one around to talk to, they’re likely to lose interest and move on to the next story. Put accurate contact details in the ‘Notes to editors’ section at the end – include phone numbers and email addresses.
- **Provide photos** – The story is more likely to be published if you provide a photo. Large or multiple images can be linked for journalists to download (for example via Dropbox.com) or alternatively note that images are available in the ‘Notes to editors’ section at the end.

Local Media Interviews / Appearances – From time to time members of the association may be invited to comment, be interviewed or to appear on discussion panels for local radio, television or online media outlets.

In these instances the member in question should:

- Be clear in establishing in what capacity they are (or are not) representing the organisation
- Refrain from providing personal opinions or commentary where they may be seen to be in conflict with the associations charitable purpose, objectives or values.
- Refrain from commenting on any issues which may be deemed controversial or which may have party political undertones.
- Be conscious of the Communication Standards as set out in this document.

6.5 AGM

The AGM is held every November at the community centre and is programmed in such a way as to bring together as many members and stakeholders as possible to mix and meet.

All stakeholders are invited to attend the AGM.

- Invitations are e-mailed to those included in the Master Contact List as detailed in section 3 of this document.
- Advertisements are placed in local newspapers
- Posts are shared via social media
- Posters are circulated to local retail outlets

The AGM is an important opportunity to showcase aspects of the organisation and communicate with all stakeholders. Groups and individual members are encouraged to participate fully in the AGM.

The programming of AGM is the responsibility of the Management Committee and there is a timetable for ensuring that members receive the papers in good time and in-line with the articles of association. Minutes of the AGM are circulated to all committee members and a redacted version is available to all other interested parties upon request.

6.6 Workshops, Focus Groups & Questionnaires

From time to time the MHCA may engage in stakeholder consultations. These may take many forms and be formal or informal in structure. Formal consultations will always have a specific objective under a developed brief e.g.

- Programme performance reviews and feedback
- Consultations on specific project proposals
- Consultation before making a significant change to the service the MHCA provides that will impact on members or service users
- Consultation pre formulation of annual or strategic plans
- Consultation pre any revisions to the MHCA charitable purpose or objectives

6.7 Committee Meetings

Papers for management Committee and Board Meetings are confidential. The Company /Minutes Secretary is responsible for ensuring that members receive the papers in good time. Documents are circulated via the MHCA Secretary E-mail account.

Any member or stakeholder may ask or be invited to attend any committee meeting, or part there of, as an 'observer'. Minutes of Management Committee Meetings are circulated to all committee members and redacted versions may be made available to individuals or interested parties upon request. Note: Committee minutes may be subject to GDPR requests.

6.8 Emails

All MHCA emails, whether to staff, members, stakeholders or third parties (for committee e-mails see below) should:

- Only contain content relevant to the recipients
- Only be issued from the Malinheadcom@gmail.com account
- Contain a concise title in the subject field
- Be signed off formally with the name and position of the author, contact information, Logo and the following registration details:

Malin Head Community Association Ltd. (MHCA) is a Registered Charity and a Company Limited by Guarantee

Registered Charity Number (RCN): 20040253

CHY (Revenue) Number: 13164

Companies Registration Office Number: 317308

Group E-mails & circulars – from time to time emails are sent to multiple recipients or to the wider stakeholder mailing list, these should Not contain contact information or mailing list details (all recipients should be entered using the BCC function)

Committee/Trustee E-mails – all e-mails should be sent via the MHCASecretary@gmail.com account or from the malinheadcom@gmail.com with the secretaries accounts cc'd for record and filing purposes.

6.9 Mail

Incoming Mail - The following procedures should be followed regarding mail received by the organisation

- Unopened mail shall be stored in a secure location
- Mail shall be opened in the presence of a minimum of 2 members of staff or committee members
- Mail shall be stamped with a received date and referenced for action where appropriate
- Responses to correspondences received in the mail should be as per sections 5 & 7 of this document.
- Filing – all mail should either be filed or shredded as appropriated

Outgoing Mail – all outgoing mail should be printed on headed paper, be duly signed and dated and include the associations Registered Charity Number. A digital copy should be retained or paper copy filed inline with the MHCA data protection policy & procedures.

6.10 Whatsapp

The MHCA Directors are included with the Centre Manager in a WhatsApp group. This medium is used for informal communications only such as reminders and comparing diaries when planning meetings etc.

7. Responding to Stakeholder Communications -

Upon receipt of any relevant stakeholder communications such as a request for information, a call for action on the part of the MHCA or a complaint, the MHCA will aim to reply in a timely manner. At a minimum an acknowledgement of receipt should be sent within 5 working days with a full written response to follow within 15 working days of receipt of the original correspondence.

7.1 Requests for Information

Requests for information regarding any MHCA programme activities or events should generally be replied to immediately upon receipt. Requests for information regarding third party services may take additional time or require that the request be forwarded on. Where a request is forwarded on to a third party the stakeholder should be contacted and advised of this upon receipt. Where there are any GDPR concerns regarding the request of third party information or personal contact details not already publicly available, a reply should be sent on receipt advising them of this and seeking express permission to forward on their contact details directly to the third person in question.

7.2 Calls to Action

where a communication is received requesting that the MHCA take action on behalf of a stakeholder or take action to address any specific issues, due consideration should be given to the organisations mandate and charitable purpose before making any commitments and responding. It may be more appropriate to redirect such requests to other third party or statutory organisations who are better placed to act.

7.3 Complaints

The Malin Head Community Association views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person or organisation that has made the complaint.

Our policy is:

- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To make sure everyone within the association knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To gather information which helps us to improve what we do.

Definition of a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of the MHCA or the Malin Head Community Centre.

Who can Make A Complaint?

Complaints may come from any User, hirer, contractor or member of the local community and may be received by telephone, email, in writing or in person.

What Might a complaint be about?

The MHCA recognises that, despite its best efforts, there may be occasions when a group or individual may wish to complain about the Associations/ Centre's actions or lack of actions. A complaint may be about the

quality of the facilities, safety of the users, the handling of a particular situation or issue, the handling of personal data, or any other matter.

Confidentiality

All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Complaint Procedure**Tier 1: To The Service Provider**

In the first instance complaints may be made to the service provider. This may be an Instructor, supervisor or attending volunteer or member of staff. If a complaint is made in person or over the telephone and cannot be actioned/resolved immediately the complainant should always be advised to put their complaint in writing either via e-mail or letter. The individual receiving the complaint should alert the centre manager immediately of any complaints which may affect the safety or safeguarding of any user or member of the public.

Tier 2: To The Centre Manager

If a complaint cannot be satisfactorily or immediately addressed by a service provider the complainant should be advised to submit their complaint directly to the Centre Manager by, e-mailing malinheadcommunity@gmail.com or in writing to Centre Manager, Malin Head Community Centre, Carnmalin, Malin Head.

Upon receipt of the complaint the centre manager will:

- Immediately deal with any safety concerns that may endanger a Community Centre user or member of the public
- Acknowledge receipt of any complaint within 5 working days via a response in the same medium, clearly setting out the process and likely time it will take to deal with the specifics of the complaint and reply in full.
- Reply with a full written response to any complaint within 15 working days of receipt of the original complaint.
- In the case of a more complex complaint, aim to reply in full within 25 working days, affording time for the complaint to be discussed and considered at the monthly management committee meeting where appropriate.
- Record the complaint in his monthly report (giving due consideration to any GDPR/privacy concerns)

Tier 3: To The Management Committee

If the Centre Manager cannot help or is the subject of a complaint the complainant should be advised to submit their complaint to the Management Committee Chairperson (Hugh Farren) by e-mailing farrensbar@hotmail.com or in writing to the centre address. The timescale for responding to any complaint will be as detailed above.

Tier 4: To Regulatory Organisations

In some circumstances a complainant may feel justified in making a submission to an external regulatory organisation such as the Charities Regulator, Tusla, HSA or Data Protection Commission by visiting their websites. This information should be made available in any relevant responses from the MHCA.

8. Communications in a Crisis

What is a crisis?

A crisis is any situation concerning the Association that is threatening or could threaten to harm people or property, seriously interrupt the work of the charity, significantly damage the MHCA's reputation and/or negatively impact the financial viability of the charity. Examples of a crisis would be: a fire or significant storm damage to charity building(s), financial wrong-doing; inappropriate behaviour on the part of an employee or a volunteer; a scandal involving a member of the Board; a sudden dramatic loss of funding as a result of a perceived problem; or an investigation into the charity by a regulator or other public body e.g. on foot of a complaint.

In responding to any crisis the MHCA will:

- Head off any potential crisis through the established risk analysis procedures
- Ensure that the key spokesperson is the most appropriate person to deal with the specific crisis. Note: the Centre Manager is the primary contact for the organisation but may not necessarily be the best spokesperson depending on the particulars of any potential crisis
- Notify all directors and committee members
- Establish if the crisis is being discussed in the public domain. If so, formulate a plan to monitor what is being said and prepare a formal response
- If approached by the media or other third parties before a formal response is finalised a variation on one of the following statements may be appropriated:
 - *The MHCA Management committee have been made aware of the situation regarding An investigation is underway and a formal statement will be released by the chairperson in the coming days. The MHCA remain committed to their mission, vision and core values.*
 - *This is an evolving situation. There are a number of statutory organisations involved in the investigation and it would be inappropriate to comment at this time. The MHCA are committed to being as open and transparent as possible and will release a full and frank formal statement in due course.*
 - *The recent....events... have resulted in..... The directors and management committee are assessing the impact of this on the organisation and are formulating a plan to..... The MHCA remain committed to to serving their charitable purpose and fulfilling their charitable objectives for the benefit of the people of Malin Head and all of our stakeholders.*

9. Publication of Policies & Procedures

A statement detailing the MHCA Complaints Procedure is displayed clearly on the notice board in the atrium of the Malin Head Community Centre and on the website. A digital copy of this policy document is also from the MHCA website.

10. Review & Revision Policy -

The Data Protection Policies contained in this document will be reviewed biannually by the MHCA Management Committee, or earlier, as soon as practicable, if there is a material change in any matter referenced.

10.1 Record of Reviews & Revisions

Reviews and revisions will be recorded on the Schedule to follow and referenced when approved in the relevant management committee minutes.

10.2 Schedule of Reviews & Revisions

Date	Revision	Reference

10.3 Approval & Adoption

This Policy was unanimously approved and adopted at the Malin Head Community Association Ltd. Management Committee meeting on June 30th 2021. Signing has been deferred due to current Covid restrictions.

Committee Secretary: (Eibhlin Porter) _____ Date: _____

Committee Chairperson: (Hugh Farren) _____ Date: _____

10.4 Next Scheduled Policy Review

June 2023