Coll Community Council WhatsApp Guidance

Purpose This practical guide helps CCC members use WhatsApp consistently with the Digital Communications, Social Media, Data Protection and Artificial Intelligence Policy v1.5 Final Draft for Adoption. It covers routine sharing, privacy, group administration and official records. WhatsApp does not replace formal CCC procedures. The policy takes effect when formally adopted; this guide does not imply that adoption has already occurred.

Six simple rules

- Use WhatsApp for quick updates, reminders and sharing public information.
- Do not use it to make formal CCC decisions.
- Do not normally use WhatsApp for confidential complaints, highly confidential CCC business or sensitive personal information. Stop and seek advice where appropriate.
- Make clear whether you are sharing information, expressing a personal view or communicating an authorised CCC position.
- Put important CCC information into an official email, report or meeting minute.
- Remember that every message can be copied, forwarded or screenshotted.

WhatsApp can be used for

- Meeting reminders and practical arrangements.
- Transport information and urgent updates.
- Sharing links, public notices and consultation information.
- Routine administrative messages and brief updates.
- Suggesting an item for a future meeting agenda.

WhatsApp should not be used for

- Making formal CCC decisions or agreeing CCC policy.
- Voting on matters that should be considered at a meeting.
- Normally, discussing confidential complaints or highly confidential CCC business.
- Normally, sharing sensitive personal information or confidential documents containing personal information.
- Unnecessary detailed discussion about identifiable people, or serious unverified allegations.
- Circulating confidential correspondence or documents containing personal information without an appropriate reason and safeguards.
- If a discussion becomes important CCC business, move it to official email or a properly convened meeting.

Know what type of group it is

- **Official CCC group** Normally includes all CCC members who wish to participate and should be clearly named.
- **Subcommittee or working group** May be limited to the people involved in that particular body.
- **External forum** May include some CCC members without being an official CCC group.
- Informal group May be a private arrangement even where CCC members participate. Its label does not remove responsibilities when members handle CCC business or information.

Key point A group does not become an official CCC group simply because one or more CCC members participate in it.

Keep the group clear and up to date

- Give the group a clear name and short description.

- Explain whether it is an official CCC group, working group or independent forum.
- Explain the purpose, who participates and that group members may see one another's telephone numbers before adding people.
- Use appropriate administrators and membership relevant to the group's purpose.
- Review membership when roles change and remove people who no longer need access.
- Provide important information by email to members who do not use WhatsApp.

Sharing information

- Members may share information that is already public, such as public notices, links, transport information and funding opportunities.
- Only present a view as CCC's position if it has been agreed and you have appropriate authority to communicate it. Routine administration within an agreed role does not need a separate decision each time. If unsure, check with the Convenor, Secretary or CCC (policy section 13).
- If information is important to CCC business, also send it through the normal official channel, usually email.

What is confidential data

Confidential data is information that is not intended to be shared publicly or widely. It includes:

- Details of a complaint while it is being considered.
- Private correspondence sent to CCC.
- Private telephone numbers, home addresses and personal email addresses.
- Information about a person's health, disability, finances or family circumstances.
- Allegations or criticism concerning an identifiable person.
- Private legal advice or information supplied to CCC in confidence.
- Passwords, account details and security information.

Before sharing, apply the policy's five-question test: Is this legitimate CCC business? Is sharing necessary? Is the information personal, private, sensitive or confidential? Do these recipients reasonably need it? Would I be comfortable if it were forwarded or screenshotted? Public availability or permission alone does not settle these questions. Use the minimum necessary, redact or anonymise where appropriate, and ask if uncertain (sections 4, 8 and 9).

Keeping an official record

- Routine reminders do not normally need to be copied into formal records. Retain information according to its purpose and CCC's current Register of Processing Activities and retention schedule, rather than simply because it is in WhatsApp (section 24).
- Important recommendations, agreed actions or information affecting CCC business should be transferred to an email, agenda paper, report or meeting minutes.

Device and account security

Protect devices with appropriate access controls, use secure passwords and multi-factor authentication where reasonably available, and remove account access when no longer needed. More than one authorised person should have appropriate access to important CCC accounts where practicable (section 14).

If information is sent to the wrong person

Report any suspected personal-data breach internally immediately to CCC's nominated data-protection lead or contact. If unavailable, alert an appropriate office bearer without delay. This includes lost devices, unauthorised access and accidental disclosure through WhatsApp. Seek prompt advice on containing the incident and preserve the relevant details for assessment.

CCC must assess the risk without delay, record the incident and decide whether notification is required. Where required, ICO notification should be made without undue delay and, where feasible, within 72 hours of CCC becoming aware; high-risk incidents may also require affected people to be informed (section 25).

If a concern or complaint is raised

- Consider the purpose and status of the particular group.
- Check whether confidential information was shared.
- Check whether a formal CCC decision was improperly made through WhatsApp.
- Check whether an informal or external group was incorrectly presented as speaking for CCC.
- The existence of a group, restricted membership or sharing public information is not, by itself, normally improper.
- Consider concerns fairly and proportionately under section 26. An honest mistake does not automatically amount to misconduct; assess the information, purpose, recipients, risk and corrective action. The policy normally applies prospectively from adoption (section 6).

Related CCC policy

This practical guide should be read alongside the Coll Community Council Digital Communications Data Protection and AI Policy v1.5 Final Draft for Adoption. Open or download the CCC digital policy

Read the guide with CCC's current Privacy Notice and Register of Processing Activities and retention schedule. If a summary here differs from the full policy, follow the full policy and applicable governance requirements. Main references: sections 7A, 8–11, 13–14, 17, 24–28 and 29.

Sources and further guidance

This guidance is a practical summary informed by the following official sources. It should be applied together with CCC's adopted policies, standing orders and any current guidance issued by Argyll and Bute Council.

- Argyll and Bute Council community councils - Council information and governance material for community councils.
- ICO guide to the data protection principles - Official guidance on lawful, fair and proportionate handling of personal information, including data minimisation.
- ICO guidance on personal data - Explains what counts as personal data and when information can identify an individual.
- ICO guidance on security - Official advice on protecting personal information and using appropriate organisational and technical safeguards.
- WhatsApp privacy information - The service provider's information about privacy, security and use of the platform.

Note: WhatsApp's use of end-to-end encryption does not remove CCC's responsibility to control what information members share, who belongs to a group and how important Council business is recorded.