

Operations Directorate

Director of Governance: Daniel Fenwick



Waltham Forest Town Hall, Forest Road, Walthamstow, E17 4JF
DX: 124540 Waltham Forest

Paul Rowsell
Department for Communities and Local Government
3/J1 Eland House
Bressenden Place
London SW1E 5DU

Ask for: Daniel Fenwick
Our Ref: DFE/RF.62
Your Ref:
Email: daniel.fenwick@walthamforest.gov.uk
Direct line: 020 8496 4295
Direct fax:
Date: 24 March 2015

By email to: paul.rowsell@communities.gsi.gov.uk

Cc: ConductCode@communities.gsi.gov.uk
Martin.esom@walthamforest.gov.uk

Dear Mr Rowsell,

Notice of Statutory Direction under Section 4A(5) of the Local Government Act 1986

Introduction

This document sets out the London Borough of Waltham Forest's ("the Council") representations in response to the Secretary of State's Notice of a proposed Direction under section 4A of the Local Government Act 1986 dated 10 March 2015. The March 2015 Notice follows two previous Notices of a proposed Direction from the Secretary of State (dated 16 April 2014 and 25 September 2014) and two previous sets of representations from the Council (dated 29 April 2014 and 9 October 2014). No formal response has ever been received by the Council to these earlier representations, other than a further Notice five months after the date of the Council's representations. The Council notes that the Secretary of State, in his March 2015 recent Notice, either accepts or does not take issue with the evidence previously supplied by the Council in its responses to the 2014 Notices.

On 19 March 2015, the Council wrote to the Secretary of State asking three simple questions about matters referred to in the Secretary of State's Notice, the answers to which were required to enable the Council to respond effectively. On the same date, Mr Rowsell responded failing to answer the first two questions raised. In relation to the Council's third question as to why the Secretary of State had issued Notices and/or Directions against certain authorities that publish more than quarterly but not others, the Secretary of State indicated that he considered it unnecessary to take any further action in respect of authorities which publish newsletters more than quarterly but less



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than fortnightly (albeit he failed to explain why he has taken no action against the London Borough of Tower Hamlets who publish *East End Life* weekly).

As the March 2015 Notice of a proposed Direction largely repeats the form and rationale (such as it was) of the two previous Notices and, to avoid repeating ourselves, we refer the Secretary of State to the two previous sets of representations as part of the Council's response to the March 2015 Notice. We consider that the majority of the arguments and evidence detailed in the Council's representations on the previous Notices are relevant to the March 2015 Notice. All three sets of written representations should therefore be read together.

Summary

The Council submits that the Secretary of State should not make the proposed direction. It is now accepted that the Council complies with every aspect of the Code of Recommended Practice on Local Authority Publicity ("the Code") other than the requirement to publish newspapers no more frequently than quarterly (see paragraph 28 of the Code). The April 2014 Notice included an allegation that the publication of "Waltham Forest News" ("WFN") did not comply with the principle of even-handedness (paragraphs 19 to 25 of the Code) but following receipt of the Council's written representations on 29 April 2014, the Secretary of State has not repeated this allegation in either the October 2014 Notice or the March 2015 Notice.

The Council has had careful regard to the provisions of the Code as to frequency but has decided to publish its free newspaper WFN 23 times a year because it is the most cost effective way for the Council to meet its various duties to publish statutory notices and other appropriate publicity. Such an approach is consistent with, inter alia, the Council's fiduciary duty to taxpayers to use its resources efficiently and its duties under section 149 Equality Act 2010 and the provisions of the Code on cost effectiveness (paragraphs 10-14) and equality and diversity (paragraphs 31-32).

In such circumstances, any Direction would serve no legitimate purpose. Further, not only is there no factual basis for the making of the direction but such a direction would be unlawful for various reasons including procedural unfairness, irrationality, common law proportionality, *Tameside*/ failure to inform, breach of section 149 Equality Act 2010, breach of section 6 Human Rights Act 1998 (a direction would be a disproportionate interference with residents' Article 10 ECHR rights), unlawful state aid and bias/predetermination.

The Secretary of State's rationale

The sole basis for the proposed Direction appears to be that the fortnightly publication of Council's newspaper, WFN, may somehow amount to unfair competition for the independent local media. The apparent rationale for the proposed Direction appears to be as follows:

- (i) the impact of WFN on the independent press in Waltham Forest “*may not be easy to assess*”;
- (ii) however, “*more or wider circulating local newspapers would be available in the borough if the Council did not publish its own newspaper more frequently than on a quarterly basis*”;
- (iii) further, even if WFN had little or no impact on the local press currently available, the Secretary of State would still as a matter of policy wish to create “*an environment which is as conducive as possible to the flourishing of independent and politically free local media*”. If WFN appeared only quarterly, “*some of the advertising that it currently takes would potentially be available to other local media, and other markets would probably develop for alternative media that would otherwise have been deterred by the existence of a Council newsheet published every fortnight.*”

It is notable that the Secretary of State has, notwithstanding numerous requests to do so, failed to produce evidence that the fortnightly publication of WFN has had any adverse impact on “independent local media”. Moreover, nowhere in the March 2015 Notice does the Secretary of State explain why he rejects the Council’s evidence provided in its previous written representations in the April and October 2014 which clearly establishes that such publication does not have an adverse impact on “independent local media”.

Impact of fortnightly publication of WFN on local independent media

The Council, in its previous representations, has provided clear evidence that there is no causal connection between the decline in *Waltham Forest Guardian* circulation and the move to fortnightly publication of WFN.

The Council also refers to the conclusions of the Communities and Local Government Select Committee that:

“there is little hard evidence to support the view of the commercial newspaper industry that council publications are, to any significant extent, competing unfairly with independent newspapers”.

This Committee suggested that the Secretary of State conduct research to see if there was any evidence to support this link. Without good reason, the Secretary of State declined to do so. The Council also understands that other authorities have provided similar evidence to Waltham Forest that, in their areas, there is little or no evidence base to support the Secretary of State’s position.

Flourishing of local media since WFN commenced fortnightly publication

In addition to this, we would also add the following evidence of a lack of impact on local independent media. These are the current titles known to us circulating in Waltham Forest:

Title	Frequency	Free / Paid	Start Date (where known)	Coverage	Circulation
Waltham Forest Guardian	Weekly (plus website)	Paid	Unknown – pre 2000	Whole borough	2,769 (ABC certified Dec 13 – Dec 14)
Chingford Guardian	Weekly (plus website)	Paid	Unknown – pre 2000	Chingford	Circulation 1,546 (ABC certified Dec 13 – Dec 14)
Chingford Times	Fortnightly (plus online edition)	Paid	June 2011	Chingford	Not known / no ABC rating
Yellow Advertiser	Weekly (plus http://www.walthamstow-today.co.uk/)	Free	Unknown but pre 2003	Across the borough	No circulation figures (No ABC accreditation)
Waltham Forest Echo	Quarterly (plus website)	Free	July 2014	Borough	10,000 copies via shops and Community spaces (not accredited)
Leyton Life	Every 2 months- since December 2014 online only (but not for reasons relate to WFN- see http://www.leytonlife.co.uk/)	Free	2006	Leyton	Not known (not accredited)
The E-List	Monthly (online)	Free	2013	Walthamstow, Leyton & Leytonstone	Not known (copies distributed free via approximately 50 outlets)

What the evidence shows is that there has been a decline in the fortunes (in terms of circulation and advertising revenue) of some existing titles, which is clearly due to changing public habits in terms of where they obtain news and other information, and to the loss of traditional forms of large-scale advertising to online sources. However, this has not prevented other titles from becoming established. Three of the titles above have launched since the Council's free newssheet commenced publishing fortnightly in 2007 (as WF Magazine and then from 2009 as WFN) and *Leyton Life*, launched in 2006, remains in circulation.

Additionally, there is a lively alternative media market via social media, including Facebook and Twitter. Appended to these representations are some examples of social media networks carrying news and information about the borough. There is clear evidence both that a flourishing independent, politically free local media exists in Waltham Forest, and that local democracy is not dependent on the existence or flourishing of printed commercial local media.

Whether one looks at the matter from the perspective of the wider factors which are causing decline for some local commercial newspapers, or from the perspective of the opportunities which evidently exist for new local media to become established, there is simply no evidence of any correlation with the existence or frequency of publication of

local authority newssheets generally or the WFN in particular. All the evidence suggests that WFN has no material impact.

No adverse impact on advertising

The Secretary of State's position appears to be that advertising from WFN "could" go to other local media and other markets for alternative media would develop, as above. No evidence is cited in support of such a proposition. Such a proposition is misconceived; all the available evidence suggests that the limited amount of advertising placed in WFN would not go to other local media generally (or local print media in particular).

The breakdown of external advertising in WFN for the past two years is set out below:

	Total External revenue	External revenue (public sector)
2013/14	£43,827	22,000 (50%)
2014/15	£40,408	17,083 (42%)

The amount of commercial advertising in both years was at or around £20,000 per annum, which even if it transferred as a whole to the local printed media is unlikely to have a material impact. Moreover, WFN's selling point for advertisers is its ABC verified circulation of 96,000 compared to the *Waltham Forest Guardian's* 4,300 rating. A commercial advertiser has confirmed to us today that they would not move their advertising to *Waltham Forest Guardian* for exactly this reason.

WFN does not take significant public sector advertisements. The local Clinical Commissioning Group uses WFN for advertising but also uses *Waltham Forest Guardian* (e.g. full page advert on 18 December 2014). Other advertisers include occasionally Bart's NHS Trust, North East London Health Trust and North London Waste Authority.

The Council's internal advertising in WFN, which was approximately £15,000 in 2013/14, would not transfer to *Waltham Forest Guardian* due to its low circulation and concentration in one part of the borough, Chingford, which undermines any benefits in terms of inform the public. We may consider alternative media, such as leaflets and outdoor advertising and local community newspapers and websites that more effectively access the communities we need to reach than the local commercial print media. This income does not include statutory notices.

WFN also features a 2 page "*What's On*" of local events and classes etc., which is free to local or voluntary sector organisations. This is not replicated in any local media and the Council has previously submitted evidence in representations from groups who use this service supporting the continued fortnightly publication of WFN.

Cost effectiveness

The Secretary of State's position is that any duty of best value is outweighed by the Government's policy of creating an environment which is as conducive as possible to the flourishing of independent and politically free local media. The Council notes that the Secretary of State's acceptance that publication of statutory notices in the local media "*could cost more*" (page 2, final paragraph). This is an admission that the effect of the proposed Direction is that the Council is required to disregard the most efficient use of its resources at the expense of local council tax payers. It would also breach the "cost effectiveness" principle of the Code. Paragraph 10 of the Code states that:

"In relation to all publicity, local authorities should be able to confirm that consideration has been given to the value for money that is being achieved."

If the proposed Direction were made, the Council would no longer be able to give this confirmation. The Council submits the Secretary of State has paid insufficient or no regard to this principle of the Code.

The Council has previously provided evidence of the additional costs of a move to quarterly publication supplemented by other media, such as leaflets and this remains the case. As stated above, any Council advertising in WFN would go into these necessary costs.

The Council refers the Secretary of State to its previous written representations on cost effectiveness and makes the following further points.

- a. On the most recent figures, only around 1.5 - 2% of Waltham Forest's population buys either of the Guardian newspapers and, even allowing for a larger readership than those that buy the papers, it is unlikely that any statutory notices would reach more than 10% of the population. This means that the underlying purpose of publishing statutory notices – that the public are able to have notice and make representations in proposals that may affect their legal interests – would be severely undermined by the use of either newspaper.
- b. By contrast, WFN has an ABC verified circulation of 96,794 households (Jan-December 2014) (this is out of 101,000 households on the Electoral Register).
- c. The legislative requirements for statutory notices exclude the possibility of publishing such notices only in non-print media. The Council and other authorities have requested that the Secretary of State modernise this position. For so long as publication in newspapers is required, it is irrational to force that to be done in a manner which reduces the likelihood of such notices coming to public attention. Publication of statutory notices in WFN is plainly the most efficient use of public funds.

Lawfulness of the proposed Direction

It is clear that if the Secretary of State makes the Direction proposed he will be acting unlawfully.

Common law proportionality

The proposed Direction to cease publication of WFN more frequently than quarterly, interferes with the Council's common law/constitutional right to freedom of expression. It also interferes with residents' common law/constitutional law right to receive information about matters of public concern.

In such circumstances, the Court will consider the following four issues to determine if a Direction is lawful:

- Whether the asserted objective of the Direction is sufficiently important to justify limitation of the common law right of freedom of expression;
- Whether the Direction to publish no more than quarterly is rationally contended to the asserted objective;
- Whether a less intrusive measure could have been used;
- Whether having regard to these matters, and the severity of consequences, a fair balance has been struck between the rights of the individual and the interests of the community.

See *Bank Mellat (No 2)* [2014] 1 AC 700

Any decision to issue a Direction would fail all four limbs of the proportionality test. In particular, in the absence of any evidence that the publication of WFN, more frequently than quarterly, damages independent local media either because it is taking away advertising revenue from such newspapers or because its existence somehow suppresses demand for local newspapers. The objective (creating an environment which is as conducive as possible to the flourishing of independent and politically free local media) cannot be said to be either sufficiently important to justify the limitation of the common law/constitutional right to freedom of expression or rationally connected with the objective of preventing unfair competition with local newspapers.

As to the third limb, there are a number of less intrusive measures that would have achieved the intended objective including limiting publication of WFN to monthly publication or permitting publication to occur more frequently than quarterly but subject to the condition that the Council did not take paid advertising from third parties in more than four editions per year. In relation to this, the Council notes that it is apparent from Mr Rowsell's letter of 19 March 2015, that the Secretary of State has decided only to issue Notices against authorities who publish weekly or fortnightly (and not those who, contrary to paragraph 28 of the Code, publish monthly).

It is also unclear why Tower Hamlets, which publishes *East End Life* on a weekly basis, has not been given a Notice of a proposed Direction.

Article 10 ECHR and Section 6 Human Rights Act 1998

The Council's residents have an Article 10 ECHR right, inter alia, to receive information on matters of public concern including the Council's activities and services, see eg *Open Door Counselling and Dublin Well Woman v Ireland* (1992) 15 EHRR 244. WFN currently provides residents with such information. The proposed Direction requiring the Council to publish WFN no more frequently than quarterly interferes with such a right both by itself but also as read with Article 14 ECHR (as the interference would have a disproportionate impact on certain protected groups such as the disabled and certain ethnic minorities). For the reasons set out in relation common law proportionality, this interference is not proportionate to a legitimate aim. It is therefore unlawful as it Direction is incompatible with a Convention right (ie Articles 10 and 14 ECHR), see section 6(1) Human Rights Act 1998.

Failure to inform/Tameside

Prior to issuing a Direction, the Secretary of State is not only required to direct himself properly as to the nature and scope of his decision-making function, but he is also required to take reasonable steps to acquaint himself with the relevant information to enable him properly to perform the relevant function, see *R v Secretary of State for Education and Science v Tameside MBC* [1977] AC 1014, HL. In breach of this obligation, the Secretary of State has failed to inform himself of relevant information. In particular, he failed to inform himself whether or not there was any basis for deciding that WFN damages independent local media.

Breach of requirements of procedural fairness

The Secretary of State has sought representations from the Council on whether or not to make a direction. To enable the Council to effectively make such representations, in a letter dated 19 March 2015, it asked the Secretary of State the following two questions:

"The penultimate sentence of the middle paragraph on page 2 of the notice states that the Secretary of State is "not convinced" by the Council's assertion that additional costs would be incurred as a result of moving to quarterly publication. Please explain the precise basis upon which the Secretary of State disagrees with the Council.

The last sentence of the first paragraph on the same page states that "other markets could have developed for alternative media". Please explain what is meant by this, and in particular what markets and what media are referred to."

Mr Rowsell's response of the same date failed to answer either of these questions. In such circumstances, the Council is not able effectively to respond to the Notice of proposed Direction. This is procedurally unfair and thus unlawful.

Section 149 Equality Act 2010

The Secretary of State, when deciding whether to issue a Direction, is required to comply with section 149 Equality Act 2010. The requirements of section 149 Equality Act 2010 are now well established. They are summarised in the recent Court of Appeal judgment in *R (Bracking) v Secretary of State for Work and Pensions* [2013] EWCA 1345.

Any decision to issue a Direction to the Council will be unlawful because the Secretary of State has failed to have due regard to the need to achieve the various statutory objectives detailed in section 149 Equality Act 2010. Whilst an Equality Impact Assessment has been completed, this document is panglossian and fails adequately to grapple with the real adverse consequences to various groups with protected characteristics that the Direction will cause. In particular, the conclusion that the Direction is unlikely to have any negative impact because the Council would be able to communicate with members of such protected groups by other means including leafleting fails to take into account the fact that the Council, like other councils, simply do not have the financial resources to utilise such leafleting given the significant cuts in central government funding presided over by the Secretary of State.

Nor can the Secretary of State be said to have had due regard to the need to promote the objectives of section 149, when he takes a step which will be detrimental to those interests, without (for the reasons set out above) any evidence that any countervailing benefit will be secured.

In its representations of 29 April 2014, the Council made detailed submissions as to radicalisation and extremism and the need to reach certain persons who are members of groups that share protected characteristics who were at risk of such radicalization. These submissions have not been addressed by the Secretary of State. We note that the Secretary of State accepts the Council's representations that:

“communication with the community, including groups that display (sic) protected characteristics, would be more effective via a physical publication [ie WFN]” (p.3, final paragraph).

This appears to be recognition that the proposed Direction would weaken communication with members of protected groups, including those vulnerable to radicalization. The Council submits that the events since that date in respect of the radicalization of youth by the Islamic State and the very real risk of young people seeking to travel to Syria / Iraq only heightens the importance of the Council being able to quickly and broadly communicate its nationally regarded Prevent strategy to the whole community. Any Direction, preventing the Council from publishing WFN no more than quarterly would fundamentally undermine such a strategy. In short, it could lead directly to vulnerable youths being radicalized and committing terrorist atrocities either in the United Kingdom or abroad. The arrest of Jamilla Henry at Luton Airport

on Thursday (March 19) by counter-terror police on suspicion of preparing acts of terrorism after landing on a flight from Istanbul and that she was from Waltham Forest, highlights this risk.

By contrast, the Secretary of State provides no evidence that a quarterly publication supplemented by other communication channels will be successful in this role. To take one example provided by the Secretary of State, we consider it unlikely that young Muslims (who are the key “at risk” group) are likely to pick up information in churches. This suggests a lack of specific consideration of the Council’s written representations on its special circumstances in respect of community cohesion and radicalization. Similarly, the Council is of the view that communicating to such groups via its website is unlikely to be effective. It appears that the Secretary of State shares the Council’s views as to the ineffectiveness of communication via the Council’s website. At the LGA conference on 9 July 2014, the Secretary of State said:

“Statutory notices also need to change. But it has been a sterile debate, with the LGA arguing for their complete abolition, replacing them with nothing other than an obscure notice on a council website.

“I am reminded of the passage from the Hitchhiker’s Guide to the Galaxy. As Arthur Dent’s house is being demolished by the council, he’s told by planning officers that the notice has been in the council’s “display department” for the last 9 months.

“A department located... in the basement; in a disused lavatory; without a light; in the bottom of a locked filing cabinet; with a sign on the door, saying: ‘Beware of the Leopard’.”

“...I want councils to work with the newspaper industry to look at new ways we can improve statutory notices and better inform the public. Digital advertising. Social media. Location- specific mobile technology. Pooling statutory notices, so they’re not in a 9 point font at the back of the newspaper, but front up, with weblinks to find out more.

“To take this forward, I want to bring councils and the newspaper industry together to work together on some pilots to show the case for innovation.

“Newspapers need to embrace new technology to survive. But they should not face unfair competition from council newspapers.

“And 21st century independent media offer councils the chance to reach out, inform and engage – an alternative to the depths of obscurity in a council website or lavatory without a light.”

Bias and Predetermination

On 17 April 2014, the Secretary of State issued a press release where he stated that the Council, along with four other councils “have been given a fortnight to explain why steps should not be taken to stop their ‘propaganda on the rates’”. The Secretary of State went on to state that:

“It is scandalous that bloggers have been handcuffed for tweeting from council meetings, while propaganda on the rates drives the free press out of business. Only Putin would be proud of a record like that.

Localism needs robust and independent scrutiny by the press and public, and municipal state-produced newspapers suppress that. ‘Town Hall Pravdas’ not only waste taxpayers’ money unnecessarily, they undermine free speech”.

On 26 September 2014, the Secretary of State issued a further press release relating to the new Notice. In this press release, the Local Government Minister stated:

“Frequent town hall freesheets are not only a waste of taxpayers’ money but they undermine the free press. Localism needs robust and independent scrutiny by the press and public.

Councillors and political parties are free to campaign and put out political literature but they should not do so using taxpayers’ money.”

(emphasis added)

Given the admitted lack of evidence that the publication of WFN and other freesheets “undermine the free press” coupled with, inter alia, the undisputed evidence from the Council that the publication of WFN on a fortnightly basis saves taxpayers’ money rather than wastes it, this press release is clear evidence of both a closed mind on the part of the Secretary of State and a biased attitude towards local authority freesheets including WFN.

It is clear from the statements made by the Secretary of State quoted above that he has not approached the decision as to whether to issue a Direction with the required open mind; the Secretary of State has predetermined this matter from the outset. This is unlawful, see *R (Lewis) v Redcar & Cleveland BC and Persimmon Homes Teesside Ltd* [2009] 1 WLR 83. Further, a fair-minded and informed observer, having considered the matter, would consider that there is a real possibility that the Secretary of State was biased, see *Porter v Magill* [2002] 2 AC 357, para 103 per Lord Hope.

Unlawful State Aid

The Secretary of State provides no reason why he considers the Council’s arguments on State Aid “misplaced”. In light of this, we have no choice but to repeat the points made in relation to this ground in our previous written representations.

Fettering of Discretion

By his announcement of 25 March 2014, the Secretary of State indicated an intention to use his direction-making power to prevent any non-compliance with the frequency provision of the Code. Such an approach, which the Secretary of State has continued to adopt, amounts to an unlawful fetter of his discretion. Further, such an approach is inconsistent with the relevant statutory scheme. Section 4 provides for codes of recommended practice and sections 4A and 4B make enforcement discretionary. Parliament thus clearly intended that non-compliance with the Code by itself should

not be a ground for enforcement; there must instead be a specific reason why non-compliance should lead to enforcement. Given the absence of evidence of any adverse consequences of WFN being published more than quarterly, it is clear that no such specific reason exists. In such circumstances, any Direction will be unlawful.

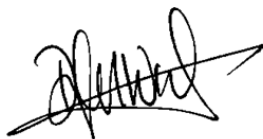
Vires

The statutory purpose of Part II of the Local Government Act 1986 was to ensure political impartiality: see section 2. The Secretary of State's policy of protecting local newspapers from allegedly unfair competition is extraneous to that purpose. Thus the provisions of the Code which pursue that policy (including paragraph 28 on frequency) and directions seeking to enforce them are ultra vires.

Conclusion

In such circumstances, any Direction would serve no legitimate purpose. Further, not only is there no factual basis for the making of the direction but such a direction would be unlawful for various reasons including procedural unfairness, irrationality, breach of section 149 Equality Act 2010, breach of section 6 Human Rights Act 1998 (a direction would be a disproportionate interference with residents' Article 10 ECHR rights), unlawful state aid and bias/predetermination.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Fenwick', with a long horizontal stroke extending to the right.

Daniel Fenwick
Director of Governance
London Borough of Waltham Forest

Cc Martin Esom, Chief Executive.

Appendix: Social media in Waltham Forest

This is a summary of social media networks in Waltham Forest. It is not an exhaustive list. It does not include the social media pages of popular local business, pubs, cafes, restaurants that do have a strong local following and that promote events in Waltham Forest as well as their own business.

* Klout is a tool that measures social influence across the web. The higher the Klout score, the higher the social influence. It uses an algorithm to calculate the account's on-line influence and takes into consideration, followers, mentions, re-tweets. Klout says the average Klout score is 20 and a score of 50+ puts you in the 95th percentile.¹

Name	What platform?	Date started	Coverage	Klout Score*	Notes
Walthamstow Residents News page	Facebook	2012	8,954 members	NA	Information and discussion Forum
@WFGuardian	Twitter	Sept 2009	5,732 Followers	55	News from the Waltham Forest Guardian in East London: Walthamstow, Chingford, Leyton and Leytonstone
@MPSWForest	Twitter	Feb 2012	5,511 Followers	55	Metropolitan Police Service
@E17ArtTrail	Twitter	Feb 2009	5,293 Followers	53	Twitter account for festival of arts events, open houses, exhibitions and performances hosted by the people of Walthamstow, NE London.
@awesomestow	Twitter	Jan 2013	5,038 Followers	44	Promoting music, art, entertainment, environmental, political and community issues in Walthamstow E17
@WalthamstowLife	Twitter	April 2012	3,771 Followers	48	Info on goings-on in E17
@Walthamstower	Twitter	Dec 2010	3,550 Followers	45	Walthamstow Times is a volunteer-driven website presenting local cultural and art events, reviews, open community & interviews with local creative people
Walthamstow Life	Facebook		3,347 members	NA	"An informal discussion group for anyone with an interest in Walthamstow, London E17."
@E17PopUp	Twitter	Oct 2012	2,234 Followers	37	E17 Pop Up Restaurant Project explores World Cuisine with "skilled chefs invited to cook authentic meals from around

¹ <http://www.businessinsider.com/the-truth-about-your-klout-score-the-math-behind-how-your-phony-number-is-mesasured-2011-12?IR=T>

Name	What platform?	Date started	Coverage	Klout Score*	Notes
					the world.”
@WFCycling	Twitter	Nov 2009	1,974 Followers	51	Waltham Forest Cycling Campaign promotes cycling and campaigns for better conditions for cyclists in the borough. Part of the London Cycling Campaign.
@AppetiteInfo	Twitter	Sept 2012	1,335 Followers	42	Appetite is a festival model for collaboration between food & art enterprise. Currently working on @CultivateWF March & the Walthamstow Garden Party 18-19 July.
@WalthamForestLn	Twitter	July 2014	1,184 Followers	49	A guide to Waltham Forest covering what it describes as its, “award-winning venues, green spaces, new attractions and a thriving cultural scene”
@LeytonVillage	Twitter	July 2012	1,118 Followers	52	“Reporting anything & everything Leyton-related, with rose-tinted glasses and a dose of sarcasm”
@StowResidents	Twitter	Jan 2012	1,115 Followers	33	Walthamstow Stadium Area Residents/Community Association. http://stowresidents.btck.co.uk Waltham Forest Small Business Competition 2013 Finalists
@ChingfordLife	Twitter	Feb 2010	1,009 Followers	36	Chingford website for local businesses and community. News articles, takeaway menus, shops, restaurants, and community info
@WFParentForums	Twitter	Sept 2009	851 Followers	41	Waltham Forest Parent Forum - a voluntary group of parents and carers of disabled children and young people from 0-25 in Waltham Forest
@HealthWatch_WF	Twitter	April 2013	709 followers	38	Health & social care consumer champion in Waltham Forest. Users invited to share their experiences (good or bad) or concerns about services they use.
@WF_NCT	Twitter	June 2012	627 Followers	39	The Waltham Forest branch of the NCT offers support,

Name	What platform?	Date started	Coverage	Klout Score*	Notes
					information & activities for parents & expecting parents
@WF_Renters	Twitter	July 2014	557 Followers	43	An independent group of private renters in Waltham Forest
Walthamstow Times	Facebook	July 2009	8,170 'Likes'	NA	Walthamstow Times is for Stowie's to remember the past, the present & the future
Leytonstone	Facebook		2,150 'Likes'	NA	"Updates on local area"
Leytonstone Life	Facebook		2,772 members	NA	"Discussion and information sharing page"
Chingford	Facebook		2,974 members	NA	Discussion page