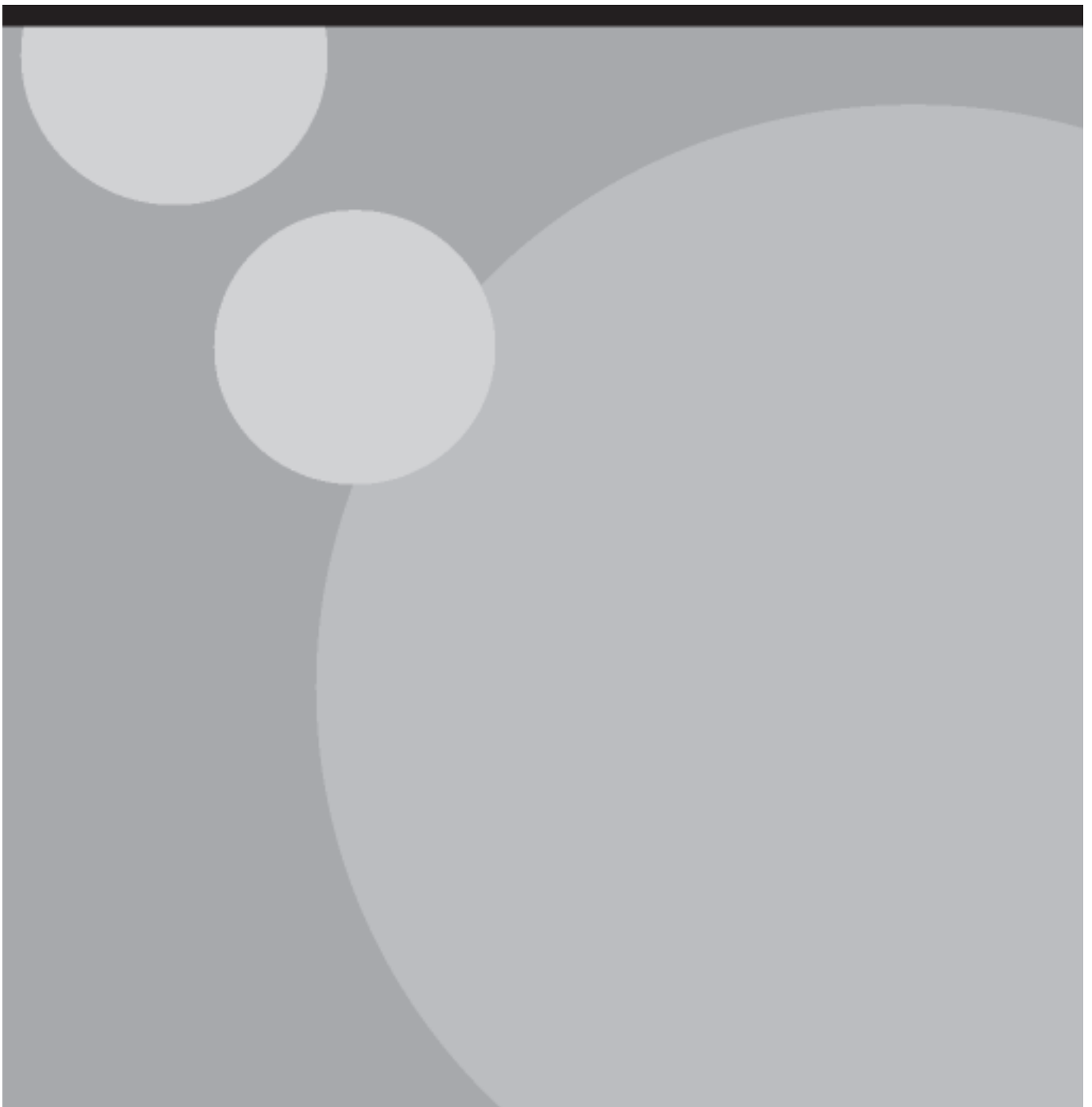




Code of Recommended Practice on Local Authority
Publicity consultation and the Communities and Local
Government Select Committee report on the Code

Government response





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Section 1

Introduction

- 1.1 The *Code of Recommended Practice on Local Authority Publicity consultation*, issued by the Government on 29 September 2010, invited responses on proposals to revise the content of the Code of Recommended Practice on Local Authority Publicity (the 'Publicity Code') to give effect to the commitment in the Coalition Agreement *Our Programme for Government* to 'impose tougher rules to stop unfair competition by local authority newspapers'.
- 1.2 The Local Government Association (LGA) and the National Association of Local Councils (NALC) were both consulted on the proposed revisions to the Publicity Code. The attention of each principal authority in England was drawn to the proposed revisions and a consultation paper with the proposed revised version of the Publicity Code was placed on the Department's web-site.
- 1.3 Responses to the consultation were requested by 10 November 2010. Over 350 responses were received from organisations, local government, publishers, newspapers and members of the public. An index of responses to the consultation can be found at Annex A. This document provides, for each of the questions set out in the consultation paper, a summary of responses received and sets out the Government's response.
- 1.4 In addition to the consultation exercise run by the Department, the Communities and Local Government Select Committee conducted an inquiry into the Publicity Code and on 6 December took evidence from, among others, the Minister for Housing and Local Government. The Select Committee also requested that the Department share the responses to the consultation with them, so that they might be considered as part of the inquiry. The Department did so, and the Select Committee reported its findings on 27 January 2011. The Select Committee's report was not considered as part of the consultation exercise. The Government's response to the Committee's report is in Section 4 of this document.

Section 2

Local authority publicity, localism and accountability

- 2.1 For a community to be a healthy local democracy, local understanding of the operation of the democratic process is important, and effective communication is key to developing that understanding. Local authority publicity is important to transparency and to localism, as the public need to know what their local authority is doing if they are to hold it to account.
- 2.2 The Government's localism policies are devolving power and responsibility away from Whitehall to local authorities and the public. In order to hold their local authority to account, the public need to have information about what their council is doing and why it is doing it. Publicity produced by the authority is an important part of this, but it is only one part - it is important that there is an independent source of this information too.
- 2.3 The revised Publicity Code contains specific guidance on the frequency, content and appearance of local authority newsletters, newssheets or similar publications. This is to address the problem of unfair competition by taxpayer-funded local authority newspapers to local newspapers, which can have a detrimental effect on them. A healthy free press is also important in providing information to the public to hold their local authority to account.
- 2.4 Under the revised Code local authorities should not retain lobbyists with the intention of the publication of any material designed to influence public officials, Members of Parliament, political parties or the Government to take a particular view on any issue. It is, of course, acceptable for local authorities to retain expert help to give professional advice on technical issues, but the Publicity Code is against the retention of lobbyists for political ends.

Section 3

Review of the Publicity Code

- 3.1 The Code of Recommended Practice on Local Authority Publicity as it applies to England is currently contained in two separate circulars, the original one from 1988 (Department of the Environment: Circular 20/88) being revised in 2001 (Department of the Environment, Transport and the Regions: Circular 06/2001) to update the rules for county councils, district councils and London borough councils in England.
- 3.2 The revised Publicity Code is a significant restructuring of the existing Codes, which it replaces for local authorities in England, updating the language of the Codes and aiming to make it easier to understand. The revised Publicity Code is also a single instrument, rather than two circulars each addressing different tiers of local Government.
- 3.3 The revisions also grouped the guidance into seven principles that require that publicity by local authorities should:
- be lawful
 - be cost-effective
 - be objective
 - be even-handed
 - be appropriate
 - have regard to equality and diversity
 - be issued with care during periods of heightened sensitivity.
- 3.4 The consultation sought views in four key areas:
- Whether the revised Publicity Code encompassed the full scope of guidance required by local authorities
 - If the revised Publicity Code represented a sufficient toughening of the rules to stop unfair competition by local authority newspapers
 - Whether the revised Publicity Code would still enable councils to provide their communities with the information local people need
 - Was the proposed Publicity Code clear enough in prohibiting the inappropriate use of lobbyists, or stalls at party conferences.
- 3.5 The consultation on the Publicity Code ran from 29 September 2010 to 10 November 2010. Both the LGA and NALC were consulted on the proposed revisions to the Publicity Code and, in addition, the attention of each principal authority in England was drawn to the consultation exercise and a consultation paper with the proposed revisions was placed on the Department's web-site.

3.6 The consultation generated over 350 responses, broadly breaking down into the following groups:

Respondent type	Number	%
Principal authorities	130	37%
Individuals	62	18%
Parish councils	44	13%
Organisations	37	11%
Publishers	37	11%
Newspapers	34	10%
Business	7	2%

Principal authorities include councils such as district and borough councils, as well as London borough councils.

Individuals mostly constitute members of the public but also include some councillors writing in a private capacity.

Organisations include representative organisations such as the LGA, NALC and the Newspaper Society and also bodies such as Age Concern.

Businesses include, for instance, printers and distributors for local authority newspapers.

3.7 Many of those who responded did not restrict themselves to commenting on the questions posed in the consultation paper but rather commented generally on local authority publicity, or on a particular aspect of it. In the case of the responses from individuals for instance, residents of Hackney responded with a mixture of positive and negative views on that authority's council newspaper.

3.8 Although the requirement for local authorities to place statutory notices in locally circulated newspapers did not form part of the consultation, many of those responding took the opportunity to offer their views on this issue, those views ranging from requests to ensure that local authorities continue to be required to place statutory notices in newspapers, to wishing to see greater use made of the internet, to local newspapers being required to publish statutory notices at no charge to the local authority.

Consultation question 1: Do the seven principles of local authority publicity as laid down in the Code encompass the full scope of the guidance required by local authorities?

Consultees' views

3.9 There was broad agreement from those who responded to this question that the revised Publicity Code did adequately cover the full scope of the guidance required by local authorities.

3.10 A common comment from councils responding to the consultation was that prescriptive guidance was not localist and that the approach taken was heavy handed. Some considered that the proposals went beyond what was required to address issues in a very few local authorities.

- 3.11 Parish councils in particular raised the issue of how on-line publicity was dealt with by the proposed Publicity Code. Principal authorities also commented upon the requirement for specific guidance on specific issues, in particular that the guidance covering publicity during the period in the run up to an election could be more detailed, one authority asking if it might not be a good idea to give specific examples of what could, and could not, be issued during the period between the calling of an election and polling day.
- 3.12 Principal authorities also took the opportunity to raise the issue, not consulted upon, of the requirement to place statutory notices in local newspapers, drawing attention to the costs of this and explaining that they considered it a regulatory burden.
- 3.13 Some principal authorities also considered that the revised Publicity Code should contain a specific section on digital, web-based, internet and on-line publicity.

Government response

- 3.14 The view expressed by the majority of those who responded to the consultation, that the seven principles in the Publicity Code do encompass the full scope of guidance required by local authorities, leads the Government to conclude that the revised format of the Publicity Code is a success and that no changes are required to the revised structure or the broad principles.
- 3.15 In answer to the concern that guidance issued centrally from Government to local authorities about publicity is contrary to the Department of Communities and Local Government's localist policies, the Government considers that a key element of localism is giving the public the information that they need to hold their council to account. This requires that information comes not just from the local authority, but also from independent sources. Local newspapers have traditionally been instruments for both holding councils to account themselves and giving the public the information they need to hold their councils to account. Ensuring that local newspapers are not the subject of unfair competition by local authority publications is, Government considers, in accord with localism.
- 3.16 The Publicity Code, as guidance, has to apply to principal, parish and town councils, as well as a number of other types of authority. The guidance, although clear in its principles, is drafted in general terms which allows it to be adapted not just to each type of authority, but also to different models of governance that authorities operate and different formats for publicity. Detailed guidance raises the risk of inadvertently preventing an authority from communicating with its community in a legitimate way as it increases the risk of misinterpretation or incorrect application.

<p>Consultation question 2: Do you believe that the proposed revised Code will impose sufficiently tough rules to stop unfair competition by local authority newspapers?</p>

- 3.17 To give effect to the Government's commitment to stop unfair competition by local authority newspapers, the revised Publicity Code proposed in the consultation contained specific guidance on the frequency, content and appearance of local

authority newsletters, newssheets or similar publications, advising that they: must not appear more frequently than once a quarter; must only include material that is directly related to the business, services or amenities of the council or other local service providers; and should be clearly marked as being published by the local authority. It was proposed that these provisions should also be extended to web-based editions of publications.

Consultees' views

- 3.18 Several local authorities responded to this question by disputing that their local authority publication was in competition with local newspapers, some suggesting that council publications complemented rather than competed with local newspapers. Several of the principal authorities that responded to this question made the point that the restrictions on the issuing of local authority newspapers in the proposed revised Publicity Code resulted from concerns over the practices of a few councils in London.
- 3.19 The LGA were clear in their opposition to the proposals in the Code about local authority newspapers. Although the LGA response explained that the majority of local authorities would not be affected by the proposed revision to the Publicity Code in regard to publications, as they published their newspapers or magazines quarterly (indeed the LGA's research cited in its response to the consultation shows that the most popular frequency among authorities for publishing a newsletter is quarterly) or less frequently, for the around 20% of authorities that the LGA identified as publishing monthly or more frequently, the LGA was of the opinion that these authorities should be permitted to continue to do so.
- 3.20 Individuals responding to this question remarked that controls on the frequency of local authority newspapers will not stop the decline of local newspaper sales.
- 3.21 The view of many parish councils was that they did not believe that newsletters and leaflets published by local councils did, in practice, compete with local newspapers. The National Association of Local Councils passed on feedback from some of their members that while their community newsletters were in no way party political, they were produced more frequently than quarterly and that the proposed restrictions were unreasonable and would mean parish and town councils having to find some other way of providing vital information about, for instance, forthcoming community events. The argument was put forward that newsletters, often just a single sheet of A4 paper, could in no way be seen as unfair competition to the local newspapers and that it was important in terms of getting information out to the community that such publications should be able to issue on a monthly basis.
- 3.22 NALC also pointed out what they considered were inconsistencies in the 'even-handedness' section of the proposed Publicity Code, in particular commenting that a sentence advising that councils should not publicise solely the work of councillors holding executive positions, or who belong to the political group who control the authority, was inconsistent with the passages of the Code that permitted local authorities to publicise the work done by individual members.

- 3.23 A number of local authorities who responded to this question expressed the view that while they acknowledged that local newspapers were valuable conduits for information about council services, there was a concern that at a time when local newspapers were restructuring to meet the challenges faced through the decline in advertising revenue and competition from new media, local newspapers were finding it difficult to cover local democratic issues with quality journalism, illustrated by the absence of their reporters from council meetings. Local authorities considered that curtailment of council publications at this time was a considerable risk to getting the public the information they need about their council and suggested support for an industry code of conduct drawn up by LGcommunications and the Chartered Institute of Public Relations local public services group.
- 3.24 The Newspaper Society (NS) considered that the proposed Publicity Code did not go far enough. It suggested an additional principle that local authorities must avoid any direct or indirect involvement in any activity constituting duplication or competition with any media, information and publicity services and initiatives, including advertising and listing services, which are provided by regional and local commercial media companies. In addition the NS suggested a ban on third party advertising in any council publications. Many of the local newspapers who replied to the consultation supported the NS's comments while local newspaper publishers, such as Newsquest, suggested that it was vital that controls are properly policed and enforced, or the changes to the Publicity Code would be ineffective.
- 3.25 Parish councils pointed out that in order to achieve and retain Quality Parish Council status they were required to publish a newsletter *at least* four times a year and that the proposed revised Publicity Code as consulted upon would place a cap on that activity by limiting their publication of newsletters to *a maximum* of four times a year. Parish councils also took the opportunity to reiterate their assertion that parish newsletters could not reasonably be considered competition to local newspapers.
- 3.26 The most common response from the newspaper industry to this question was to ask how the Publicity Code is to be enforced, stressing that vigorous and robust enforcement would be required if the new measures were to work. Several of the responses from the newspaper industry suggested that central Government should enforce the Publicity Code. Organisations responding to this question also raised the issue of enforcement.

Government response

- 3.27 The Government is encouraged that the most popular frequency for the publication of a newsletter is quarterly, and that by publishing to this frequency the majority of authorities already comply with the guidance in the proposed Publicity Code. For the local authorities that do publish more frequently, the Government is not persuaded that such frequency is necessary, and is concerned that this frequency will have a detrimental impact on local newspapers, which could end up depriving the public of access to a free press and removing one of the measures by which councils may be held to account.
- 3.28 The Government considers that quarterly is the right frequency for the publication of local authority newsletters, as it constitutes the right balance between keeping the

public informed about local authority services and any changes to those services, and avoiding unfair competition with daily or weekly local newspapers.

- 3.29 The Government is persuaded by the arguments put forward by parish and town councils that responded to the consultation that parish council newsletters, often a single sheet of A4 paper, do not constitute competition to local newspapers. As a result, the revised Publicity Code as proposed in the consultation paper has been revised further to advise parish and town councils that it is acceptable to publish on a monthly basis.
- 3.30 Further, the Government acknowledges that the Publicity Code proposed in the consultation paper could have been perceived as a disincentive to councils communicating their policies and the reasons for their actions to the public. This is an important function of local authority publicity; the public should be informed not just of what action their authority is taking, but why the authority is taking that action. As a result, the Publicity Code proposed in the consultation document has been revised to remove the possibility of confusion over this issue and is now clear that authorities may communicate, explain and justify their policies and actions to the public.
- 3.31 The Government considers a voluntary code an interesting proposal, but is of the view that the issue of local authority publicity remains contentious enough to require central guidance to ensure that publicity remains value for money for the taxpayer.
- 3.32 The Government considers that, with the changes outlined above, the revised Publicity Code with its focus on value for money and the appropriateness of local authority publicity will have the effect of stopping unfair competition by local authority newspapers. In terms of enforcement, the Government's view is that there is no power in the 1986 Act to provide for any enforcement mechanism in response to any purported breach of the Publicity Code. If members of the public consider that an authority has failed to have regard to the Publicity Code, they should raise their concern with the local authority directly, or contact the authority's auditor.

Consultation question 3: Does the proposed Code enable local authorities to provide their communities with the information local people need at any time?

- 3.33 The proposed Publicity Code is not intended to be an impediment to local authorities communicating effectively with their communities. The Government understands that local authorities have to communicate a wide variety of information, on both a planned and reactive basis. Further, the Government recognises that local authority publicity such as that raising awareness of local authority services or local amenities will not always be demonstrably value for money.
- 3.34 In particular, the Government recognises that local authorities need to continue to issue publicity during the period in the run up to an election or referendum. However, the Government realises that this is a time where there can be particular concern about the use of local authority publicity. The principle of issuing local authority publicity with care during periods of heightened sensitivity, such as elections and referendums, addresses this.

Consultees' views

- 3.35 There was no overall consensus among local authorities over whether the proposed revised Publicity Code would enable local authorities to provide their communities with the information that they need. Many felt that they it would and, where a local authority felt it would not be able to communicate effectively as a result of the revised Publicity Code, opinion varied between the Code having a slight effect to it being far too prescriptive.
- 3.36 The LGA responded that for the one in five authorities that produce a newsletter more frequently than quarterly, the result would be a need to print more leaflets to communicate directly with residents. It considered that the most appropriate way of regulating local authority publications would be for the sector to put forward its own code of conduct, and supported the code put forward by LGcommunications.
- 3.37 The LGA also considered that, as drafted, the proposed Code would prevent local authorities from communicating its decisions and justifying its policies to the public.
- 3.38 NALC commented that there was scope in the proposed Publicity Code for clarification of issues, such as publicity about individual members of the council, so that local councils have a very clear understanding of what information they may communicate and the means by which they do this.
- 3.39 Local authorities also expressed concern that, as drafted, the proposed Code would prevent local authorities from communicating their decisions and justifying their policies to the public. This view was also expressed by the Association of Council Secretaries and Solicitors who were concerned that part of the section on 'Objectivity' in the proposed Publicity Code rendered the Code unworkable. They contended that the section advising local authorities that their publicity should not be, or be perceived to be, aimed at influencing the public's opinions about the policies of the authority, should be removed, giving the illustration that a national park authority may well wish to promote the need for affordable housing.
- 3.40 LGcommunications did not consider that the proposed Publicity Code would allow local authorities to conduct the publicity it needs to in order to inform and engage with residents.
- 3.41 Some local authorities responding to this question raised the concern that restricting council publications to quarterly was too extreme a reaction to a very small problem. They also expressed concern that restricting their publication frequency would have a negative impact on their ability to communicate with their communities, in particular harming engagement with harder to reach groups.
- 3.42 In a number of responses, councils quoted surveys they had undertaken showing public satisfaction with council publicity and explaining that, with some local newspapers covering more than one council, authorities were effectively competing for space in local newspapers.
- 3.43 Councils responding to this question also raised the issue of negative press from local newspapers, who focused on stories that were critical of the council meaning

that council publications were an important tool for letting residents of the authority know more about the activities of their council in a more balanced way. Some councils responding were critical of local newspapers for not sending journalists to cover council meetings, but did acknowledge that this was a result of local newspapers not being resourced to cover proceedings.

- 3.44 Individuals responding to this question came forward with a variety of views about how effective local authority publicity is. One response remarked that local authority newsletters were, in effect, junk mail and like in the case of junk mail, members of the public should be given the option of opting out of receiving printed newsletters.
- 3.45 There was strong support for local authority newspapers from those organisations who responded to this question and who were involved in charitable, community or social work. In particular they remarked on increased public interest in their work after being featured in council publications and commented that council publications were happy to devote space to their activities while local newspapers were not.
- 3.46 The Government acknowledges the importance of local councils communicating their policies and reasons for their actions to the public and the Code as consulted upon has been modified to clarify this.

Government response

- 3.47 The majority of local authorities publish newsletters or magazines quarterly or less frequently, which is in line with the revised Publicity Code. The Government's view is that these authorities presumably consider that with this frequency they are able to provide the public with the information they need about the council. The Government is not persuaded that if the remaining minority of authorities adopt this approach it will inhibit their ability to communicate with the public.
- 3.48 In addition, the Government considers that the way in which the public gets information about its local authority is changing with, for instance, increasing use of the internet. Councils should not restrict themselves to blanket leafleting to communicate matters to the public but should take an innovative approach to getting information to those that need it, placing information where users of a service have access to it and focusing resource where it will do the most good. It is not credible for instance that information about a road closure would need to be distributed to every household in the authority.

Consultation question 4: Is the proposed Code sufficiently clear to ensure that any inappropriate use of lobbyists, or stalls at party conferences, is clearly ruled out?

- 3.49 The proposals for a revised Publicity Code included a prohibition on the use of private specialists, contractors or consultants (in short, 'lobbyists') with the intention of the publication of any material designed to influence public officials, Members of Parliament, political parties or the Government to take a particular view on any issue.

- 3.50 The Government considers that the use of lobbyists is related to the use of publicity, in that it is one of the methods by which authorities might spend taxpayers' money to influence people one way or another in relation to political issues and is therefore within the ambit of the Publicity Code.
- 3.51 In addition, the proposed Publicity Code advised that local authorities should not pay to have stands or displays at conferences of political parties to issue publicity designed to influence members of political parties to take a particular view on an issue.

Consultees' views

- 3.52 The general view expressed by those who replied to this question was that the proposed Code was sufficiently clear to ensure that any inappropriate use of lobbyists, or stalls at party conferences, is clearly ruled out.
- 3.53 While many of the local authorities that replied explained that the advice about lobbyists in the Publicity Code did not apply to them because they did not employ lobbyists, some did feel that it was inconsistent with the principles of localism for Government to seek to discourage the use of lobbyists.
- 3.54 The LGA disagreed with the advice as drafted in the Publicity Code proposed in the consultation document. They pointed out that clearly it would be inappropriate for councils to spend money on lobbyists when their in-house communication staff could do a similar job, but that bringing in expertise to work on a particular project, for instance to campaign for local transport improvement, can result in significant economic benefits for an area and is often cheaper than employing staff directly. The LGA did not see why councils having a presence at party conferences should be a concern of central Government.
- 3.55 NALC explained that the advice on lobbyists and stalls at party conferences was of virtually no relevance to parish and town councils.

Government response

- 3.56 The Government acknowledges that the revised Publicity Code as drafted in the consultation document was ambiguous about what sort of specialist assistance it was legitimate for a local authority to employ where that skill did not exist inside the authority itself.
- 3.57 It is not the Government's intention to prevent local authorities from employing, for instance, specialist researchers or scientific advisers where necessary. The final version of the revised Publicity Code has been amended to simplify the language of the section giving advice about the retention of lobbyists by using the plain English term 'lobbyists'.
- 3.58 The Government's concern about local authorities having stands or displays at the conferences of political parties to issue publicity designed to influence members of political parties to take a particular view on an issue is that taxpayers are funding the process. Moreover, they are funding a process that the Government considers is not

needed. It is quite legitimate for a councillor to make representations directly to a Minister either in writing, over the telephone or in person, it does not require a taxpayer funded stall at a party conference.

Section 4

Report of the Communities and Local Government Select Committee

- 4.1 In December 2010 the Communities and Local Government Select Committee held a short inquiry into the scope of the Publicity Code and to examine its impact on local government. They considered the version of the Publicity Code that the Government consulted upon, and not the version of the Code laid before Parliament which has been amended to, for instance, allow parish councils to issue newsletters once a month should they wish to do so, and to clarify guidance about the retention of 'lobbyists'.
- 4.2 The Committee asked to see the responses to the Department's consultation and these were supplied as requested.
- 4.3 The Committee heard evidence from representatives of the LGA, NALC and London Councils, along with representatives from the newspaper industry. The Minister for Housing and Local Government also gave evidence.
- 4.4 The Committee published its report on 27 January 2011. A copy is available from the Committee's web-site at:
<http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/>
- 4.5 The Committee observed that they had found little hard evidence to support the view of the newspaper industry that council publications were, to any significant extent, competing with independent newspapers, although they did note there was a concern that such competition might escalate in future. However, the report went on to state that there is a clear concern that some local authorities are using council taxpayer's money to promote their local politicians or policies. The report comments that while there is a case for individual politicians and parties to state their position on particular issues, this should be at their own expense and it is appropriate that the proposed Code should prevent such activities being undertaken at taxpayers' expense.
- 4.6 The Committee believed that, if properly enforced, the provisions in the proposed Code relating to cost-effectiveness, content and appearance are sufficient to deal with the excesses of certain council papers and doubts the need to specify frequency of publication in the Code, especially in the context of localism.
- 4.7 The Committee recommended that the Government review the publication requirements for statutory notices, with a view to making them more cost-effective and to allow councils to be better able to take advantage of new means of publication such as the internet.

4.8 Finally, the Committee was persuaded that the issue of the use of public money on political lobbying is an important one which Government needs to address, but was not persuaded that the Publicity Code is the right tool to apply constraints upon such activity.

Government response

4.9 The Government is pleased that the Committee recognises the importance of the provisions in the Code on cost-effectiveness, content and appearance of publicity. The Government also considers, though, that the frequency of council publications is an important issue. The LGA's research shows that the majority of local authorities publish newsletters quarterly or less frequently, indicating that publishing quarterly is not a bar to effective communication. Moreover, the Government considers that quarterly strikes the right balance between a local authority being able to inform its communities about useful contacts and changes to services and amenities without being competition to local newspapers.

4.10 In the Government's judgement, there is an issue with local authority newspapers constituting unfair competition to local newspapers and the Government is taking action to address this now rather than delaying to conduct further statistical exercises. The consultation exercise did not yield any evidence that would cause Government to revisit the policy.

4.11 The Government considers that the revised Publicity Code supports localism. Local newspapers are important for holding local authorities to account, both directly and by giving the public the information they need to hold councils to account. Local authority newspapers in competition with local newspapers are unlikely to either challenge the authority that publishes them, or to publish information that allows the public to hold the authority to account.

4.12 The Government recognises that, in the version of the proposed revised Publicity Code consulted upon, there was scope for confusion about what does and does not constitute a 'lobbyist'. The version of the Code laid before Parliament uses the plain English word 'lobbyist' to describe a professional retained to gain political advantage for the local authority. This reduces the risk of misunderstanding and recognises that it is quite legitimate for local authorities to retain specialists to advise on, for instance, transport or environmental issues.

4.13 The Government considers that the prohibition on the use of lobbyists is within the general ambit of the Code as the use of lobbyists is related to the use of publicity in that it is one of the methods by which authorities might spend taxpayers' money to influence people.

4.14 Finally the Government notes the Committee's recommendation that the Government review the publication arrangements for statutory notices with a view to making them more cost-effective and to allow councils to take advantage of the opportunities for dissemination of information provided by the internet. The Secretary of State has been clear that 'in the internet age, commercial newspapers should expect over time less state advertising as more information is syndicated online for free'.

Annex A

Index of responses to consultation

Ackrill Media Group
Age Concern Hackney
Allerdale Borough Council
Alton Town Council
Amber Valley Borough Council
Anglia Newspapers Ltd.
Archant
Arlesey Town Council
Arun District Council
Association of Chief Secretaries & Solicitors (ACSeS)
Association of News Retailing
Association of North East Councils
Association of Professional Political Consultants
Association of Social Care Communicators
Avon and Somerset Police Authority
Aylesbury Vale District Council
Mr P Back
Bangladesh Football Association
Mr G Barker
Barking and Dagenham London Borough Council
Barnsley Chronicle
Cllr Clarence Barrett
Basildon District Council
Basingstoke and Deane Borough Council
Baylis Media
Mr J Beale
Bedfordshire Association of Parish and Town Councils
Bedfordshire Times and Citizen
Rt. Hon. Sir Alan Beith MP
Billingshurst Parish Council
Birmingham City Council
Blackpool Council
Blackpool Gazette
Mr S Blagg
Bolton Council
Tina Borkowski
Botley Parish Council
BPM Media
Mr Brian Bowles
Bridget Bradford
Breckland Council
Brent London Borough Council
Brighton & Hove City Council
Bromsgrove District Council
Mr E Brown
Buckingham County Council
Bucks Herald
F Ruth Cadby
Calderdale Metropolitan Borough Council

Cambridge City Council
Cambridgeshire County Council
Camden London Borough Council
Jacqueline Campbell
James Cannon
Canterbury City Council
Carlisle City Council
Mrs R Cass
Castle Donington Parish Council
Millie Chadwick
Chalgrave Parish Council
Chartered Institute of Journalists
Chartered Institute of Public Relations Local Public Services Group
Chartered Institute of Public Relations
Chelveston-cum-caldecott Parish Council
Cherwell District Council
Chester Police Authority
Chichester District Council
City of Bradford Metropolitan District Council
City of York Council
Clevedon Town Council
CN Group Ltd.
Connect Communications
Corby Borough Council
Coventry Newspapers
Crawley Borough Council
Cumberland and Westmorland Herald Ltd.
Cumbria County Council
Curdworth Parish Council
Mr K d'Arcy
Darlington Borough Council
Daventry District Council
Denham Parish Council
Derby City Council
Derbyshire Times
Derry Journal Newspapers
Didcot Town Council
District Councils Network
Mr P Dodd
Dorset County Council
Dover District Council
Mr Steve Dowding
Draycott Parish Council
Durham County Council
Ealing London Borough Council
East Kent Mercury
East Lindsey District Council
East Midlands Newspapers Ltd.
East Northamptonshire Council
East Staffordshire Borough Council
Eastbourne Herald and Gazette
Eastleigh Borough Council
Enfield London Borough Council
S Enine
Erewash Borough Council
Essex County Council

Express & Star Ltd.
Eyelevel Design Consultants
Penelope Finian
Mr M Foreman
Frodsham Town Council
Gazette Media Company
Mr Richard Gibbs
Mr A Gibson
Mr J Gibson
Gloucester City Council
Goole-Howden Courier
Greater London Authority
Greater Manchester Police Authority
Mr J Green
Greenwich London Borough Council
Mrs S Griffin
Guardian and Independent Series
Guildford Borough Council
Hackney City farm
Hackney Homes
Hackney London Borough Council
Haddenham Parish Council
Hammersmith & Fulham London Borough Council
Harlington Parish Council
Harvington Parish Council
Havering London Borough Council
Headway West London
Hemel Hempstead Gazette
Judy Henderson
Hertford Heath Parish Council
High Peak Borough Council & Staffordshire Moorlands District
Council
Mr D Hill
Holme Valley Parish Council
Hounslow London Borough Council
Hull City Council
Hyndburn Borough Council
Industrial Health Control Ltd.
Iniva
Inspire
Ipswich Borough Council
Isle of Wight Council
Isle of Wight County Press
Islington London Borough Council
Ivybridge Town Council
Mr M James
Rachel James
Mrs S Jenkinson
Daisy Johnson
Cllr Geoff Juby
Keighley Town Council
Mrs Kathleen Kelliher
Kent Association of Local Councils
Kent Messenger
Kentish Gazette
Kettlestone Parish Council
Mr A Key

Kickburton Parish Council
Mr R King
Kirklees Council
KM Group
Mr K Kondakor
Mr A & Mr P Kraft
Lambeth London Borough Council
Lancashire County Council
Lancashire Evening Post
Lancashire Publications Ltd.
Lancaster and Morecambe Newspapers Ltd.
Landford Parish Council
Leeds City Council
Leicester City Council
Leicestershire County Council
Leighton Buzzard Observer
Lewes District Council
LG Communications
Lincolnshire County Council
Little Snoring Parish Council
Local Government Association
London Councils
Luton News & Dunstable Gazette
Mr Jonathan Lyons
Maldon District Council
Manchester City Council
Mansfield Chad
Mrs Karen Marsden
Matlock Mercury
Mr P Mayer
Mayor of London/London Assembly
Media Wales
Medway Council
MEN Media
Mepal Parish Council
Mr B Metcalf
Milton Keynes Citizen
Milton Keynes Council
Mr Ines Miskin
Mrs A Morland
Morton Newspaper Group
Cllr Mike Nason
National Association of Local Councils
National Union of Journalists
Ncjmedia
Neath Port Talbot County Borough Council
Newbury Town Council
Newcastle City Council
Newham London Borough Council
Newport Pagnell Town Council
News Letter
Newsfax International Ltd.
Newspaper Society
Newsquest Hertfordshire
Newsquest North and East London
Newsquest South and West London

Newsquest South West
Mrs P Newton
NHS Lambeth
Norfolk County Council
North Dorset District Council
North East Derbyshire District Council
North East Lincolnshire Council
North Hykeham Town Council
North Somerset Council
North Warwickshire Borough Council
North Yorkshire County Council
Northampton Borough Council
Northamptonshire Newspapers
Northeast Press Ltd.
Northumberland Association of Local Councils
Nottingham City Council
Nottinghamshire County Council
Okeford Fitzpane Parish Council
Oundle Town Council
Oxford City Council
Oxfordshire County Council
Packington Parish Council
Peterborough Today
Ponteland Community Partnership
Ponteland Town Council
Poole Borough Council
Portsmouth City Council
PR Copywriting and Consultancy
Premier Newspapers
Cllr Robert Pritchard
Mr B Proctor
Reading Borough Council
Redcar and Cleveland Borough Council
Redditch Borough Council
Ribble Valley Borough Council
Rosedale East and West Parish Council
Rotherham Advertiser
Rotherham Metropolitan Borough Council
Rushcliffe Borough Council
Salford City Council
Saltash Town Council
Sandwell Metropolitan Borough Council
Scarborough Evening News
Scottish Provincial Press Ltd.
Seaham Town Council
Selby Times
Sheffield Telegraph
Shildon Town Council
D Skrytek
Judy Smith
Society of Local Council Clerks
South Yorkshire Fire and Rescue Authority
South Yorkshire Newspapers
Southwark London Borough Council
Southwater Parish Council

Cllr. Roland Spencer
St. Albans City and District Council
St. Edmundsbury Borough Council
St. Helens Council
St. Joseph's Hospice
St. Mary's Secret Garden
St. Stephen in Brannel Parish Council
St. Anne's on the Sea Town Council
St. Helens Council
Staffordshire County Council
Stevenage Borough Council
Stithians Parish Council
Stockport Council
Streatham and Clapham High School
Suffolk Coastal and Waveney District Council
Surrey Communications Group
Sussex Newspapers
Sutton London Borough Council
Mr J Taylor
Telford & Wrekin Council
Tendring District Council
Mr Michael Ter-Berg
Thanet District Council
Thanet Extra
The Distribution Company
The News, Portsmouth
The South Yorkshire Times
The Star
Thirston Parish Council
Three Rivers District Council
Thurrock Council
Tower Hamlets London Borough Council
Trafford Council
Mark Travis
Trinity Mirror Huddersfield
Trinity Mirror North Wales
Trinity Mirror North West and North Wales
Trinity Mirror plc
Cllr L Turner
Tweeddale Press Ltd.
Wakefield Council
Waltham Forest London Borough Council
Wandsworth London Borough Council
Warwickshire and West Midlands Association of Local
Councils Warrington Borough Council
Warwickshire Rural Community Council
Warwickshire County Council
Waterloo Action Centre
Watford Borough Council
Mrs Maggie Watson
Tim Webb
Mr Paul Webbewood
West Lancashire Borough Council
West Sussex County Council
West Sussex Network of Public Relations Officers

Westminster City Council
Wigan Council
Mr J Williams
Wokingham Borough Council
Woodley Town Council
Worcester City Council
Worksop Guardian
Mr Jonathan Wragg
Mrs J Wright
Wyre Borough Council
Yapton Parish Council