

PART 5 – COMMUNICATIONS PROTOCOL

1. Introduction

- 1.1 Medway Council is committed to communicating with the public, keeping residents and partners informed, and involving them in the process of local decision making. Our communications activity should be guided by best practice and must respond to the requirements of the law on local government publicity.

Media relations require a careful and co-ordinated approach in any large organisation.

- 1.2 The benefits of a co-ordinated approach to media relations are clear:
- the Council is presenting a united and co-ordinated message
 - the appropriate spokesperson is identified for each issue
 - the flow of information on media inquiries and releases to Councillors is maintained
 - we can monitor that we are responding promptly to media inquiries
- 1.3 This protocol explains how the Council will achieve a co-ordinated approach to media relations and will ensure that all media relations activity meets legal requirements. It covers:

Section 2 The legal position

- The Local Government Act 1986
- The Code of Practice on Local Government Publicity

Section 3 Medway Council's local protocol

- The role of Medway's Councillors in communications
 - Spokespeople
 - Reporting Cabinet decisions
 - Reporting overview and scrutiny recommendations
 - Reporting Full Council decisions
 - Party political publicity
- The role of Medway's officers in communications
 - The corporate communications team
 - The role of managers and other Council staff
 - The role of political assistants
- Targets for responding to media inquiries
- Communications and publicity with partner organisations

- Assisting others with publicity
- Using external public relations support
- Cost effective publicity
- Monitoring compliance with this protocol and penalties for non compliance

2. The legal position

2.1 Local government communications and publicity are strictly regulated by law and national guidelines. All members and officers must follow these when communicating on behalf of the Council. The following sections describe the relevant law and guidelines.

The Local Government Act 1986 (section 2) (amended in 1988 and 2001)

2.2 The main point of the Act is:

A Council must not publish any material which in whole or in part appears designed to affect support for a political party. It cannot give financial or other assistance to any other organisation to publish such political material.

2.3 The key test is:

- Does the material refer to a political party or persons identified with a political party or promote or oppose a point of view on a question of political controversy which is identifiable as the view of one party and not another.

2.4 However the following factors also need to be taken into account:

- The content and style of the material – there is a greater risk with material which seeks to persuade
- The time and circumstances of publication and the likely effect on those to whom it is directed – there will be a different threshold for material issued close to an election
- Where the material is part of a campaign the effect which the campaign appears designed to achieve
- Material mentioning the name of a political party greatly increases the chance of it being seen as political
- Strident language or emotive terminology is inappropriate

- Verbatim use of language in leaflets or press releases issued by a political party should be avoided
- Publicity designed to support a particular issue rather than a political party can be in breach of the act where the issue is one of political controversy supported by one party and not another or where the publicity appears designed to enhance one party or harm another
- Criticism or support for government policies (as opposed to the party of government) is not in itself unlawful. However, the more directly it is done, the more likely it is that a court would consider the publicity relates to the political party behind the constitutional body.

2.5 This restriction applies to:

- members
- Council employees (including school based staff)
- other organisations and contractors communicating with the media or issuing publicity on the Council's behalf
- communications issued jointly by the Council with partners or by partners on behalf of the Council
- other organisations issuing publicity with Council funding (for example voluntary organisations) including information we display on their behalf. The definition is wide enough to include theatrical productions and artistic events. It will cover attacks on political parties' policies by such organisations.

2.6 'Publicity' should be understood to include any communication addressed to the public at large or to a section of the public or any communication which will or may come in to the public domain:

- Newspapers – including statements and press releases issued by the Council
- Newsletters – including Medway Matters and the Pulse
- Leaflets
- Plans and publications including statutory and other plans
- Posters
- Campaigns

- Advertising
- The web site and other electronic publishing for example digital TV
- Conferences and exhibitions
- Consultation in any form
- General publicity information on t-shirts, carrier bags, badges and the like

2.7 Local authority agendas and minutes are excluded from the Act. However any secondary publication of a Council decision is not. Therefore where for example Council passes an overtly party political motion a Council press release should not quote directly from the minute and must be modified to ensure it does not contravene the Act.

The Code of Practice on Local Government Publicity

2.8 The Code of Practice gives more detailed guidance on principles of good practice. Councils are ‘required to have regard to the provisions of any such code in coming to any decision on publicity.’

The code covers a number of areas which are expanded on below in terms of operation of the code in Medway:

2.9 Publicity for individual Councillors

The Code of Practice was revised in April 2001. A consequence of the amendments is the replacement of previous guidance on publicity for individual Councillors.

- Publicity about individual Councillors can include contact details, the positions they hold in the Council (for example Cabinet member or Overview and Scrutiny Committee chairman) and their responsibilities.
- The code permits the publication of information about individual Councillors’ proposals and recommendations *only where this is relevant to their position and responsibilities within the Council*. Comments on proposals should when made by portfolio holders be relevant to their portfolio and refer to facts only.
- The code accepts it may be appropriate to quote ward Councillors if the issue relates to their ward. Any quotation must remain factual for example “I welcome the decision to spend £... in my ward” or “I will be expressing the views of my constituents at the overview and scrutiny or Council meeting”.
- In all circumstances, publicity should be objective and explanatory and personalisation of issues and personal image making should be avoided. However it will sometimes be appropriate for a member who has been

driving an issue to take credit for their work. As long as the publicity is about the policy and achievements this will usually comply with the code.

- The justification for any proposals or recommendations must not be done in party political terms, expressly advocating the policies of a particular political party or opposing those of another.

The code also stresses that publicity should not be, or liable to misrepresentation as being, party political. While it may be appropriate to describe policies put forward by an individual Councillor which are relevant to their position and responsibilities in the Council, this should not be done in party political terms and should not directly attack the policies and opinions of other parties, groups or individuals.

2.10 The content and style of publicity

Publicity material may be produced to:

- raise awareness of Council services to inform existing clients and attract new ones - in certain cases, such as sport and leisure facilities entertainment provided, attracting tourism or investment promotional material will be appropriate
- support the running of the authority (such as recruitment advertisements)
- explain/justify the Council's policies, generally or on specific topics - for example as a background to consultation

Publicity should be relevant to the functions of the local authority and should not unnecessarily duplicate material produced by other bodies. The new power to promote economic, environmental and social well-being does however give the Council power to issue publicity on matters of local interest, not just about Council functions. In coming to a conclusion on whether this power can be used regard must be had to:

- Is the action likely to promote or improve the well-being of Medway?
- Is the primary purpose of the action to raise money?
- Is what we propose explicitly prohibited by other legislation?
- Are there any explicit limitations and restrictions on the face of other legislation?

To rely on these powers we must be able to answer yes to the first question and no to the following three.

Publicity on the Council's policies and aims should be objective, concentrating on facts.

Where publicity comments on the proposals of other bodies (for example neighbouring Councils, the Government) the comments must be objective, balanced, informative and accurate. The publicity should explain the reason for the Council's view. Councils are allowed to have a view on controversial issues – but publicity must be presented clearly in a balanced, objective, informative and accurate way. A prejudiced, unreasoning or political attack on the proposal or the person putting that proposal forward will never be acceptable. Consultation must be balanced and if options are being given the publicity must explain the pros and cons of each.

There is not a need to give equal text inches to opposing views. However this should usually be proportionate to other publicity. It is good practice to summarise the views the Council disagrees with and direct people to for example a full report or consultation paper setting out those views.

Campaign publicity is acceptable, for example to promote services or to attract tourism or investment. Campaigns can also be used to influence behaviour or attitudes on matters such as health, crime, environmental issues and equal opportunities. Considerable care is required where campaigns are mounted to persuade the public to hold a particular view on a question of policy or where an issue does not concern a specific function of the Council.

Political groups are of course able to issue their own releases – but this must not use any Council resources or imply the release is issued on behalf of the Council and must be at their own expense.

2.11 Making publicity available

The main purpose of local authority publicity is to increase public awareness of services, explain the reasons for particular policies and priorities and generally to improve public accountability.

Information and publicity produced by the Council should be made available to all those who want or need it. Local authorities should not discriminate against or in favour of individuals or groups in the compilation of material for reasons not connected with the efficiency and effectiveness of issuing the publicity.

Where material is produced covering issues affecting vulnerable sections of the community, such as the elderly and children, particular care should be taken to ensure it is unambiguous, easy to understand, unlikely to cause needless concern, and personal details are not divulged.

Local authority newspapers, leaflets or other material distributed unsolicited from house to house and information on the website reach far wider audiences than publicity available on application to the Council. Councils should give particular consideration to the use of electronic and other new media communication systems, but should not rely solely on them, to avoid excluding those without easy access to such systems.

Where it is important to target a particular audience, consideration should be given to using the communications networks of other bodies, such as voluntary organisations, and making use of electronic communications systems.

2.12 Cost effective publicity

The code emphasises the need for publicity to be cost effective. This and the Local Government Act 1999 covering best value reinforce the need to assess all publicity to ensure it offers value for money.

2.13 Advertising

Advertising can be a highly intrusive and expensive medium. In certain circumstances, however, it will be the most cost-effective means of publicising a local authority's activities to promote the social, economic and environmental well-being of an area.

The primary consideration on whether to use advertising should be cost-effectiveness.

Advertisements are not normally likely to be appropriate as a means of explaining policy or commenting on proposals.

Advertising in media covering an area significantly wider than the authority's is not likely to be an appropriate means of providing information, rather than attracting people to the authority's area or to use its facilities.

The attribution of advertising material, leaflets and other forms of publicity that reach the public should be clearly set out.

It is not accepted to pay for advertising as a disguised means of subsidy to a voluntary, industrial or commercial organisation.

Any decision to take advertising space in a publication produced by a voluntary, industrial and commercial organisation should be made only on the grounds that it provides an effective and efficient way of securing the desired publicity.

Local authorities should never use advertising as a means of giving financial support to any publication associated with a political party.

2.14 Publicity in the run up to elections

The Council must not issue proactive publicity about candidates and other politicians directly involved in an election from the time the notice of an election is served until after the election itself. Publicity on controversial issues or where the views of individual groups or Councillors can be identified should also be avoided. The best practice is to avoid mention of any Councillor who is seeking re-election. If it is necessary to do so that publicity

should be balanced with a reference to the relevant politicians from opposing parties. Proactive events should not involve politicians up for election. A comment in reaction to a decision which has been made can be used providing it is a factual comment subject to the balance set out above.

The same extent of control does not apply to by-elections. Subject to compliance with the Act and code publicity about individual Councillors who are not involved in the by-election is permitted.

3. Medway Council’s local communications protocol

- 3.1 The following sections describe the local protocols for communication and publicity adopted by the Council. These take into account the legal framework and good practice.

The role of Councillors in communications

- 3.2 Spokespeople

Executive functions and agreed Council policy

The Leader, Deputy Leader and Cabinet portfolio holders collectively hold executive (decision making) positions. These members will be the designated spokespeople on executive functions and agreed Council policy on behalf of the Council to the press, broadcast and other media.

The Leader and each Cabinet member have portfolios - the relevant portfolio holder will be the nominated spokesperson on the area of his/her special responsibility. Where a portfolio holder is for any reason unavailable the Leader or Deputy Leader will determine the most appropriate spokesperson.

It is possible that situations may arise, for example emergencies, when a member who does not have Cabinet responsibilities may act as spokesperson. An example would be a ward member speaking either solely or in conjunction with another spokesperson on behalf of the Council in response to an incident in the area they represent.

Overview and scrutiny and other standing Committees

Other members of the Council have been designated with special responsibilities

- Chairs of the Overview and Scrutiny Committees
- Chair of the Planning Committees
- Chairs of remaining standing Committees (Licensing, Employment Matters Appointments) when appropriate
- The Mayor (or Deputy Mayor in his/her absence)

These members may, subject to this protocol, comment on behalf of the Council to the press, broadcast and other media, on all matters relating to their special responsibilities.

The role of spokespeople

Any member acting as Council spokesperson is speaking for the Council and not in a party political capacity.

In addition to acting as Council spokespeople, members with special responsibilities will also represent the Council at official events such as openings and launches and at events run by partner agencies.

3.3 Ward members

Ward members have an important role in communicating with their constituents. However ward members too must bear in mind the restrictions on publishing political material using Council resources.

When using Council headed paper or e-mailing using Council resources or a medway.gov e-mail address the correspondence should **not** include an overtly party political stance.

Groups are mechanisms recognised by the Council and in law. There is a distinction to be made between a political group of the Council and a political party. As such members may, if they wish, sign their letters with reference to 'member / of x group'. Members should however be aware that reference to any political affiliation will increase the likelihood of correspondence being perceived as party political. It is not appropriate to give party membership – for example labour / conservative/ liberal democrat member for x.

If members wish to make political statements in correspondence Council headed notepaper should not be used.

The Medway logo must not appear on notepaper which includes the logo of a political party or group. This could be interpreted that the group or party stance is that of the Council.

3.4 Reporting Cabinet decisions

An IT database has been established on the Council's website to publish the decisions of Cabinet. However, this may not necessarily reflect the detail and full implications of the issues discussed and there will be a need to publicise and expand on these executive decisions through news releases and the Council's website.

Issues for discussion by Cabinet will be published in the forward plan. The agenda and papers for the meeting are made available to the media and public in advance. Releases issued prior to a Cabinet meeting will be factual

only. If an approach is made by the media for an interview before Cabinet – it will be for Cabinet leader or portfolio holder to decide whether or not they wish to comment.

Cabinet representatives and the media team will identify any individual issues warranting other media and website publicity after each meeting. It is possible that journalists attending the meeting or reading the press release will also request interviews with Cabinet members and every effort will be made to accommodate this.

The media team in corporate communications will liaise with the Leader/Deputy Leader and relevant portfolio holder to prepare news releases following Cabinet meetings. Cabinet news releases, as with all others, should be issued as promptly as possible after the meeting/event to maximise coverage and to ensure they remain contemporaneous.

Releases will be factual, outlining the decision, the context in which it was made, issues relating to it and any action to be taken. Any quotes included will relate to the member's Council responsibility and will not be party political. Releases on Cabinet decisions will outline the call-in procedure.

The media team will respond to media inquiries about decisions of Cabinet, referring journalists, wherever appropriate, to the Leader or portfolio holder.

A digest of Cabinet decisions will be included in the Pulse.

3.5 Reporting overview and scrutiny recommendations

Overview and scrutiny business and recommendations are also reported on the website. Overview and scrutiny Committees deal with two main types of business – policy development and scrutiny of Cabinet and officer decisions.

(i) Policy development

Releases will be issued, if necessary, in advance. Any media inquiries beforehand will be referred to the relevant chair. If publicity is required on policy investigations this can be discussed with communications staff.

Publicity about overview and scrutiny will focus on factual information about the issue/s under scrutiny, those involved, how the process works and the recommendations made. It will explain the process for the recommendations being considered by Cabinet.

(ii) Scrutiny of decisions

News releases may be issued following consultation with the relevant chair prior to scrutiny consideration of all called-in items to maintain the flow of information about decisions made and implemented. The release will focus on factual information about the decision and how call-in works. Publicity, if issued following scrutiny deliberation will focus on factual

information about the issue/s called in, those involved, how the process works and the recommendations made. Where the course of action recommended is contrary to that proposed by Cabinet, this will be explained and the process for resolving the issue and making a final decision outlined.

Where an issue is referred to Full Council for decision, publicity will be restricted to the process involved. No proactive publicity will be issued until a final decision has been made.

If publicity is required for any matters being scrutinised by overview and scrutiny this should be discussed with the communications team.

A summary of the recommendations made by Overview and Scrutiny Committees will be included in the Pulse.

3.6 Reporting the decisions of Full Council

The decisions of Full Council are included on the Council's website. A press release will also be issued after each Full Council summarising the decisions made.

Releases will be factual, outlining the decision, the context in which it was made, issues relating to it and any action to be taken. Any quotes included will relate to the member's Council responsibility and will not be party political. Releases will give contact details for the communications team.

3.7 Party political publicity

All parties are of course free to issue their own releases. No Council resources however must be used in their preparation or distribution. If Council resources are used the publicity is covered by the restrictions on political neutrality in the 1986 Act and are subject to the code.

4. The role of officers in communications

4.1 The political neutrality of officers

- All officers must operate within the legal restrictions on publicity described in section 2.
- All officers must, in carrying out their jobs act in a politically neutral way.

Senior officers above spinal point 44 (except school based staff) are also bound by the Widdicombe laws on political neutrality included in the Local Government and Housing Act 1989 which restricts their political activity outside work.

Senior officers may not:

- seek election as an MP or Councilor
- act as a political agent or sub agent
- participate in branch activities of a political party
- speak to the public or a section of the public with the apparent intention of affecting public support for a political party
- write artistic work which could have similar impact

Under the Council's local protocol, particular officers fulfill specialist roles.

4.2 The role of the communications team in media and public relations

The media team is responsible for media relations for and on behalf of the Council. This includes:

- issuing proactive press releases
- responding to day-to-day inquiries from the media by issuing statements and/or arranging interviews with members or officers as appropriate

Any manager or employee who receives a media inquiry must redirect it to the media team in communications.

The media team will offer advice to members with responsibility as Council spokespeople and managers on the most appropriate approach to media issues. They will also advise on the appropriateness and legality of any proposed proactive and reactive publicity, if necessary seeking further advice from the Council's legal officers.

(i) Proactive releases

The media team may issue proactive press releases in a range of circumstances and in conjunction with others, for example emergency services. For example:

- to inform about a member decision/recommendation
- to publicise how to access a service – particularly if changes are being made
- to publicise an event
- to promote a campaign or raise awareness of a topic of local interest

- to pass on good news for Medway
- to publicise Medway's good practice and to raise Medway's profile in support of the Council's core values and other objectives
- to publicise an inspection report – good or bad
- to publicise the fact that consultation is taking place and how to become involved in it
- to inform residents what to do in cases of an emergency or to give safety alerts
- to give forward notice of things likely to disturb residents for example road-works
- to announce an appointment, election, reshuffle
- to appeal (in the case of a missing person)

The content of proactive releases is drawn up in consultation with relevant officers to ensure factual accuracy.

(ii) News releases

All news releases issued by the media team will be copied on email (or by post where a member is not on the email) to the relevant portfolio holder and any other member that the portfolio holder thinks is relevant, and made available in accordance with the 'sharing information on media inquiries and releases' protocol (paragraph (v) below)

Where issues relate to matters of decision by the Leader and/or Cabinet, a draft release will be emailed to the Leader or portfolio holder in advance of release, so that the content can be discussed and agreed.

(iii) Statements/response to media inquiries

The media team will, in consultation with relevant officers, issue statements in response to media inquiries. If the inquiry relates to a matter of agreed Council policy rather than simple factual checks the media team will liaise with the relevant portfolio holder.

Where the media team is informed by the journalist making the inquiry that they are responding to a political group issued release the officers' response will be limited to any factual clarification only. The journalist will be given details of the portfolio holder or relevant spokespeople (as relevant depending upon which group has issued the release). The media team will inform the relevant member that an inquiry has been received and that a journalist may make contact on the issue. The response to a release issued by a political group thus remains with politicians, ensuring

that officers' political neutrality cannot be called into question.

(iv) Proactive public relations, marketing and campaigns

The public relations team are responsible for proactive public relations, marketing and campaigns. Any officer wishing to develop proactive public relations or campaign publicity proposals must discuss ideas with the communications team.

The communications team will not issue any release or promotional material if the content appears to be in breach of the publicity code or other legislation.

(v) Sharing information on media inquiries and releases

Copies of all news releases issued and a summary of media inquiries will be sent to the Leader, Deputy Leader, Cabinet, group leaders, nominated media contacts and corporate management team on a daily basis or at the earliest opportunity.

(vi) Media monitoring

Current resources do not permit the Council to buy a media monitoring service. The media team will prepare a weekly digest of stories relevant to the Council covered in the local and national papers. They will also list broadcast media coverage where the interviews have been arranged through the media team/they know coverage is planned. This weekly digest will be published in the Pulse.

4.3 The role of managers and other Council staff

Any manager or employee who receives a media inquiry should redirect it to the media team. It is not appropriate for officers to initiate contact with the media or respond to media inquiries independently without first consulting with the media team.

The media team may offer an officer for media interview where the subject matter is purely factual or a journalist is seeking a background briefing. In other circumstances where comments are required on matters of Council policy or the outcomes of member decision making (see above) the most appropriate spokesperson is likely to be a member – that decision will be made by the media team in consultation with the Leader/relevant portfolio holder or Chief Executive and directors in the absence of the Leader or portfolio holder.

The only exceptions to this are publicity issued for arts and theatre activities and programmes - this is handled by the arts team, and publicity on adult education courses - this is handled by community and adult education. However, any arts and theatre and adult education publicity concerning

Council policy or other matters beyond publicising shows/exhibitions/courses will be handled centrally as described above.

Staff should not under any circumstances go to the press with grievances of any kind – these should be handled through normal line management arrangements or by using the whistle blowing policy.

4.4 The role of political assistants

Section 9 of the Local Government and Housing Act 1989 permits the appointments of assistants for political groups (not for political parties). The purpose of the appointment must be to assist in the discharge of functions by members of a political group as members of the authority. The Act does not permit political assistants to be used in any additional political or other activity.

Political assistants can support Councillors in preparing press releases for their group if those releases relate to members' work as Councillors. Releases prepared in this way must of course not purport to come from the Council. Political assistants may not issue press releases in their own right.

Political assistants may not assist with general press releases for the local/national political party or releases that are not associated with the functions of the group on the Council.

5. Targets for responding to media inquiries

- 5.1 The media team has a target of responding to all media inquiries within a maximum 24 hours. Some inquiries may require an even quicker response to meet press deadlines. In the case of TV and radio, responses are required almost instantly and sometimes hourly. The media team will make clear the priority of the inquiry when media staff contact members and officers. Responding on target is only possible with the co-operation of all members acting as spokespeople and all officers asked for information. It can be damaging to the Council's reputation to fail to respond to inquiries.

6. Communications and publicity with partner organisations

- 6.1 Increasingly the Council is working in partnership with other agencies. This includes issuing joint communications and publicity. The terms of this protocol and local government publicity law **must** be followed when the Council issues such joint publicity. This is the case even if publicity is issued jointly with organisations not themselves covered by local government publicity law. Any officers discussing potential joint communications activity with other agencies must ensure that partners understand that compliance with this protocol is a condition of any joint arrangements.
- 6.2 The communications team will ensure that all appropriate checks are carried out on any such publicity, and reserves the right to withdraw the Council from joint publicity arrangements if this protocol is not being followed.

7. Assisting others with publicity

7.1 The principles of the publicity code should also be taken into account if the Council is assisting others to issue publicity. The Council must:

- incorporate the relevant principles of the code in published guidance for application of grants
- make the observance of that guidance a condition of the grant or other assistance
- monitor to ensure the guidance is observed.

7.2 It is appropriate for local authorities to help charities and other voluntary organisations by arranging for pamphlets and other material produced and paid for by the organisation to be available for collection by the public in public libraries and other suitable locations. Such material should not offend against any legal provision.

8. Using external public relations and publicity support

8.1 The Council's in house public relations and design teams provide high quality, cost-effective services in comparison to external providers. However, they may not always have the capacity to take on all public relations and design work.

Officers should wherever possible predict their needs and plan ahead to maximise the use of in house resources.

8.2 In terms of design and print, a select list of external providers has been drawn up by corporate contracts and corporate communications. They have negotiated competitive rates for the Council as part of a wider consortium. If external design or print services are to be purchased, companies from this list **must** be used. It is not permissible to go to other companies.

8.3 In terms of public relations support, any appointment of external agencies must follow agreed Council contract procedures. A member of the public relations team should be fully involved in the selection process from the outset. Clear written working arrangements between the external provider and the Council's public relations team must be established to ensure that all releases are cleared with the Council's media team to ensure compliance with this protocol prior to issue.

8.4 **Any external public relations agency acting on behalf of the Council must abide by the terms of this protocol and local government publicity law. These must be conditions of any appointment and written into the contract defining the service the Council will receive and it would be good practice to test their knowledge of the Act and code as part of any evaluation process leading to appointment.**

9. Cost effective publicity

9.1 Local authorities are accountable to the public for the efficiency and effectiveness of their spending on publicity, in the first instance through their audit arrangements. National guidelines state that publicity must be justifiable and cost-effective and in deciding on the nature or scale of publicity, Councils must take into account:

- Whether it is statutorily required or discretionary
- The purpose to be served by the publicity where it is statutorily required
- Whether the proposed cost is in keeping with the purpose and expected effect of the publicity.

All officers should bear in mind these guidelines when planning or commissioning publicity either through the in house team or external providers.

10. Monitoring compliance with this protocol and penalties for non compliance

10.1 Compliance with this protocol will be monitored on an ongoing basis by the communications team. They will liaise as necessary with legal officers and the monitoring officer. It is though the responsibility of all members and staff to understand their responsibilities and obligations under local government publicity law and this local protocol.

10.2 Failure to comply with the code can result in:

- Complaints through the Council formal complaints procedure
- Complaints to the Local Government Ombudsman alleging maladministration
- Complaint to the external audit service over the Council's expenditure
- Judicial review of the Council's decision
- Damaging and unwanted media attention over unlawful publicity
- Reference to the Council's Overview and Scrutiny Committees for a possible investigation

