

## **Brighton & Hove City Council's Response to Consultation on the Code of Recommended Practice on Local Authority Publicity**

### Introduction

In principle, Brighton & Hove City Council ('the Council') welcomes the Government's proposal to replace the existing Codes of Recommended Practice on Local Authority Publicity with a new Code. The various media for publicity have developed significantly since the existing Code was last updated some 9 years ago; equally, in the current financial climate, it is more important than ever that councils justify their expenditure on publicity, and it is right that one of the principles that legitimises local authority publicity should be cost-effectiveness.

The Council is pleased to see the consultation document recognise the use that local authorities have made of publicity not merely to inform the public about council services but also to encourage greater participation<sup>1</sup>. This Council has done much to publicise its democratic arrangements with the local population, aimed at motivating people from all backgrounds to engage with local and national politics. For example, as recently as 23 September, the Council ran a full programme of 'Democracy Day' events across the city, trailed in advance by publicity to maximise public awareness and involvement.

In response to the particular questions posed in the consultation, the Council's submission is as follows.

### **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?**

The seven principles represent a comprehensive set of criteria against which to measure the appropriateness of council publicity. However, whilst the Council does not disagree with any individual principle, there is a risk that in combination the seven principles limit the scope for flair and innovation in its publicity output.

Publicity is worthless if no-one reads or acts on it. Our wish therefore, is that the seven principles are not applied over-zealously.

### **2. Do you believe that the proposed revised Code will impose sufficiently tough rules to stop unfair competition by local authority newspapers?**

This Council does not seek to compete with commercial newspapers. The Council's newspaper, 'City News', is published only ten times a year and therefore does not represent a competitive threat to the city's commercial newspaper, 'The Argus', which is published daily. The majority of advertising

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<sup>1</sup> Paragraph 7 of the consultation refers

in City News is from internal departments. The very small amount of external advertising carried by City News is also mainly from public service partners and does not dilute the revenues of the commercially produced daily.

The Council strongly supports the Local Government Association (LGA) in calling for a review of the duty on local authorities to place specified notices in a third party newspaper circulating in the local area<sup>2</sup>. However, this presupposes that local authority newspapers can be published frequently enough to ensure that any statutory notices appearing on its pages are current. Limiting their frequency to once every three months would restrict the number of such notices these newspapers could carry, leaving councils with the expensive alternative of relying on paid-for space in commercial publications.

The annual cost to the Council of placing statutory notices in The Argus is £110,000 at a time when the circulation of this newspaper has fallen to less than 10,000 in the Brighton & Hove area. It would make more sense financially and as a way of reaching significantly more local people to allow local authorities to print public notices in their own newspaper.

Similarly, it is much more cost-effective to publicise council services in our own newspaper than it would be to pay for advertising space in commercial publications. As a guide, the local paid-for newspaper charges £754 for a half-page advert. If the new Code prevents us from publishing monthly, the Council might on occasions have to resort to commercial publications to communicate important campaigns; it is these publications, not the Council's own paper, that would gain financially.

### **3. Does the proposed Code enable local authorities to provide their communities with the information local people need at any time?**

Reducing the frequency of our newspaper from monthly to quarterly could discriminate against those who rely on the printed version of this publication as their main source of information about council services and initiatives. We know that those in lower socio-economic groups and the more elderly residents in the city are less likely to have internet access at home, are harder to reach and more likely to be cut off from communication with the council.

Nationally, there are 9.2 million adults in the UK who have never accessed the internet (source: ONS). If the Council has to channel an increasing proportion of its publicity via the web, due to our printed newspaper being available just once a quarter, those without internet access will be affected disproportionately. We would not wish to marginalise such people in this way.

The Council publishes 'City News' not only in standard printed format but, for the benefit of those with a visual impairment, as an audio CD. We plan to go

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<sup>2</sup> See LGA press release of 18 October 2010: 'Scrap rules which force councils to pay out £200 million to local newspapers'

further by producing the newspaper in large print from 2011. Users of these special formats would be adversely affected by restrictions imposed on the frequency of publication.

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

This Council does not use professional lobbyists or have stands at political party conferences. Nonetheless, we consider that paragraphs 26 and 27 of the proposed Code are sufficiently clear that the use of such facilities by local authorities would be prohibited.

That said, the Council is pleased the Government recognises the legitimacy of councillors themselves lobbying MPs or Government Ministers<sup>3</sup>. This constitutes an important tool for councillors to represent the views of local people at national level and to influence government policy.

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<sup>3</sup> Paragraph 5 of the consultation document refers

