



**Committee:** AUDIT COMMITTEE  
**Date:** TUESDAY, 26<sup>TH</sup> OCTOBER 2004  
**Venue:** MORECAMBE TOWN HALL  
**Time:** 6.00 P.M.

**A G E N D A**

1. Apologies for Absence
2. Minutes of the Meeting held on 28<sup>th</sup> July, 2004 (previously circulated).
3. Items of urgent business authorised by the Chairman
4. Declarations of Interest
5. 2004-05 Audit and Inspection Plan Lancaster City Council (Pages 1 - 10)

A representative from District Audit will be in attendance at the meeting to introduce the Plan.

6. Constitutional Arrangements for the Exercise of the City Council's Licensing Functions - report of the Head of Legal Services attached. (Pages 11 - 16)
7. Regulation of Investigatory Powers Act 2000 - report of the Internal Audit Manager attached. (Pages 17 - 20)
8. Media Guidelines Protocol - report of the Chief Executive attached. (Pages 21 - 32)

**ADMINISTRATIVE ARRANGEMENTS**

**(i) Membership**

Councillors M. Thomas (Chairman), I. S. Barker, J. Barry, J. Gilbert, D. Kerr, D. Whitaker and G. K. Wilson.

**(ii) Substitute Membership**

Councillors S. Bray, S. Burns, C. Coates, J. Hanson, P. Gardner, A. Stone and J. Taylor.

**(iii) Queries regarding this Agenda**

Please contact James Doble, Principal Democratic Support Officer, telephone 582057, or alternatively e-mail JDoble@lancaster.gov.uk.

**(iv)** Changes to Membership, substitutions or apologies

Please contact Members' Secretary, telephone 582170, or alternatively email [memberservices@lancaster.gov.uk](mailto:memberservices@lancaster.gov.uk).

MARK CULLINAN  
CHIEF EXECUTIVE  
TOWN HALL,  
DALTON SQUARE,  
LANCASTER LA1 1 PJ

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## Audit and inspection plan Lancaster City Council

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- The Audit Commission's requirements in respect of independence and objectivity

<b>Reference:</b>	Lancasterauditinspectionplan04050.doc – Version 2
<b>Date:</b>	October 2004

## Introduction

This plan sets out the audit and inspection work we propose to undertake in 2004/2005. The plan has been drawn up from improvement planning meetings with you, and our risk based approach to audit planning. This plan reflects the Audit Commission's elements of the co-ordinated and proportionate audit and inspection programme.

## Strategic regulation

Strategic regulation is at the core of the Audit Commission's plans. It is a new more focused and more risk-based approach. Our approach to strategic regulation embodies four key principles:

- it is a force for continuous improvement
- it is focused on outcomes for service users
- it is proportionate to performance and risk
- it is delivered in partnership.

We intend to demonstrate the benefits of strategic regulation in your audit and inspection programme by focussing our key areas of improvement work on outcomes for users and reducing the amount of grant claim work overall through linking the work to an assessment of risk.

## Our responsibilities

In carrying out audit and inspection work we comply with the statutory requirements governing it, in particular:

- for our audit work
  - the Audit Commission Act 1998;
  - the Code of Audit Practice (the Code); and
  - the Local Government Act 1999;
- for our inspection work
  - the Local Government Act 1999.

We have worked with you on the improvement planning process to ensure that the work of the Audit Commission and other inspectors is co-ordinated and targeted at your key areas for improvement.

To clarify the purpose of our different responsibilities we have divided the plan into the following categories:

- improvement
- assessment
- assurance.

## The fee

The fee for our 2004/2005 programme of work is set out below.

Audit area	2004/05 Fee (£)	2003/04 Fee (£)
Improvement	24,695	3,285
Assessment	7,900	14,020
Assurance		
• Accounts	35,135	36,830
• Governance	21,255	20,905
• Use of resources	35,615	26,140
<b>TOTAL</b>	<b>124,600</b>	<b>101,180</b>

*Note: the fee is net of ODPM grant*

Whilst the fee is shown in comparison to the 2003/04 fee the two years are not directly comparable. In 2003/04 the CPA inspection was undertaken resulting in a higher inspection fee, lower use of resources fee, and the 2003/04 audit was also reduced to some extent since it was combined with the 2002/03 audit.

In setting the fee we have assumed:

- you will inform us of significant developments and emerging risks
- Internal Audit meets the appropriate professional standards
- officers will provide good quality working papers
- officers will provide requested information within agreed timescales
- prompt responses to draft reports.

Changes to the plan will be agreed with you.

These may be required if:

- significant new risks emerge
- additional duties are required of us by the Audit Commission
- changes are agreed with the other inspectorates.

In addition to the above fee there will be a fee for the grant claim certification work for 2004/2005. The exact fee for this work will

depend on the number and complexity of claims and at this stage it is difficult to estimate the fee since it is too early to assess the impact of strategic regulation on claims work. We will inform you of the estimated fee as soon as we are able to. The fee for the certification of 2002-03 grant claims was approximately £37,600.

## Improvement

Through our improvement planning meetings with you and the other inspectorates we have reached a shared understanding of your top priorities for improvement. This section sets out the Audit Commission's proposed activity linked to those improvement priorities. This work has been proposed after consultation with the other inspectorates to ensure our work programmes are co-ordinated and proportionate.

Improvement priority	Action proposed
Performance management	We will work with officers and members in developing an approach to performance review at management team and cabinet level. We will also review the new corporate and service planning approach used for 2004/05 in particular focussing on the extent to which it has improved the Council's focus on priorities and outcomes to feed into the further development for the 2005/06 planning cycle.
Democratic renewal	We will continue our work with the Council on this area in particular focussing on alternative ways of operating Full Council meetings.
Access to services	We will complete an inspection of the Council's approach to access to services. This work will be designed to be completed alongside the Council's Best Value Review on this subject to enable us to contribute to the Council's development in this area.
Improvement priority	Action proposed
Organisational change	We will work with officers as they implement the Council's improvement

plans to assist with the effective implementation of organisational change.
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### Voluntary improvement work

Where the council requests additional work to help with the improvement agenda we will be happy to discuss detailed proposals. The fee for this work, undertaken under section 35 of the Audit Commission Act 1998, would be agreed separately with the council.

## Assessment

### Qualitative assessment of continuous improvement

In the autumn of 2004 we will assess the progress the council has made in the last year in delivering its improvement agenda

The Audit Commission will publish an updated comprehensive performance assessment (CPA) for your council and all other councils in December 2004.

#### Expected outputs

CPA improvement report
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## Assurance

### Accounts

We are required to give an opinion on your accounts. We will do this by reviewing your core processes for producing the accounts:

- the main accounting system
- the budgetary control procedures
- the final accounts closedown procedures.

We will then undertake detailed testing of the figures in the accounts.

We will undertake the following specific work to address the risks we have identified for 2004/2005. These risks may be liable to change as the 2004/2005 financial year progresses, and we will update our risk assessment and work programme during the year.

Risk	Action proposed
Non-compliance with the new accounting treatment	We will liaise with staff on the new treatment

required following the changes made by the Local Authorities (Capital Finance and Accounting) Regulations 2003.	required during 2004/05 to help to ensure the correct treatment is used.
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<b>Expected outputs</b>
SAS 610 report
Audit opinion
Final accounts report

Our work on your accounts does not seek either to obtain absolute assurance that the financial statements present fairly your financial position or assurance that they are accurate in every regard.

In this context we adopt a concept of materiality. In planning and conducting our audit of your accounts, we seek to ensure that there are no material errors in your financial statements. Material errors are those which might be misleading to a reader of the financial statements.

An unqualified opinion may not be given on financial statements that contain material misstatements. In the course of our work, we may also identify non-material misstatements that we will report to officers for amendment, unless they are clearly inconsequential. If officers do not make the required amendments, we will report the amendments to the Committee approving the financial statements so that there is an opportunity for them to be amended prior to the approval and certification of the financial statements.

## Governance

We are required to determine whether you have adequate arrangements for:

- legality
- financial standing
- internal financial control
- standards of financial conduct and preventing and detecting fraud and corruption.

The work on your governance arrangements will be linked with our improvement work identified earlier in the plan. Additionally we will undertake the following specific work to address the risks we have identified for 2004/2005.

Risk	Audit work proposed
The Council faces a number of challenges including making effective use of the £33m economic development zone monies and developing and then implementing a masterplan for the regeneration of the West End of Morecambe.	We will review the arrangements in place in relation to these projects to ensure effective management and delivery.
Along with other authorities the Council faces significant financial pressures.	We will place particular emphasis on the budget setting process and arrangements for ensuring the sustainability of initiatives such as recycling, the management of under/over spends, linkages with service plans, achievement of planned savings.
Inadequate response to new or key legislation which could lead to unlawful actions and possible financial penalties.	We will review the Council's arrangements in relation to a number of areas including the civil contingencies bill, single status requirements and money laundering.

<b>Expected outputs</b>
Governance report

## Performance management

### Overall arrangements

We will review whether you have adequate arrangements to secure economy, efficiency and effectiveness in the use of your resources.

The work on your overall arrangements will be linked with our improvement and assessment work identified earlier in the plan. Additionally we will undertake the following specific work to address the risks we have identified for 2004/2005.

Risk	Audit work proposed
Poor implementation of new financial systems resulting in loss of functionality and/or	We will review the Council's arrangements for implementing new financial systems

unreliable financial information.	including ensuring that maximum functionality is achieved.
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Additionally, we will follow-up our work from previous years to check progress on the implementation of agreed recommendations, including the 2003 housing inspection.

### Best value

We will undertake a review of your Best Value Performance Plan (BVPP) to ensure it meets the statutory requirement in respect of its content. We will issue an opinion on this plan before the end of December 2004. We will also review and comment on your systems for collecting performance information and in particular BVPIs.

<b>Expected outputs</b>
Performance information report

## Grant claim certification work

The Audit Commission has changed the certification audit regime to reduce the amount of work overall, and better link the work to assessments of risk. The benefits of this approach will begin to be achieved in our certification work later in 2004, and be fully achieved in 2005. The main changes are:

- claims for £50,000 or below would not be subject to certification
- claims between £50,001 and £100,000 would be subject to a reduced, light touch, certification audit
- claims over £100,000 would have an audit approach relevant to the auditors assessment of the control environment and management preparation of claims. A robust control environment would lead to a reduced audit approach for these claims.

## The team

Name	Title
Mike Thomas	Relationship Manager
Mike Thomas	District Auditor
Fiona Blatcher	Audit Manager

Wanda Rossiter	Performance Lead
Dawn Watson	Team Leader
Robert Huntington	IT specialist

We are not aware of any relationships that may affect the independence and objectivity of the team, and which are required to be disclosed under auditing standards.

In relation to the audit of your financial statements, we will comply with the Commission's requirements in respect of independence and objectivity as set out at Appendix 1.

## Further details of our respective Code responsibilities

The Audit Commission's Statement of Responsibilities of Auditors and Audited Bodies gives further information on our respective responsibilities under the Code of Audit Practice.

## Reporting

We will provide reports, or other output as agreed, to the Audit Committee for each of the risk areas identified in the plan. Our key milestones are set out in the planned outputs section. This is prepared in draft form and will be updated regularly as work programs are agreed, and will form the basis of audit progress reports to officers and the Audit Committee.

We are also required to report relevant matters relating to the audit to those charged with governance. The following section on planned outputs shows how we will address this requirement.

## Status of our reports to the council

*Our reports are prepared in the context of the Statement of Responsibilities of Auditors and Audited Bodies issued by the Audit Commission. Reports are prepared by appointed auditors and addressed to non-Members or officers. They are prepared for the sole use of the audited body, and no responsibility is taken by auditors to any Member or officer in their individual capacity, or to any third party.*



## Planned outputs

Our reports will be discussed and agreed with the appropriate officers before being issued to the relevant Committee.

Planned output	Start date	Draft due date	Key AC contact
Performance management report	June 2004	September 2004 (initial feedback in relation to performance review June/July 2004)	Fiona Blatcher
Access to services	June 2004	March 2005	Fiona Blatcher
Organisational change	TBA	TBA	Fiona Blatcher
SAS610 report	August 2005	October 2005	Fiona Blatcher
Audit Opinion	August 2005	October 2005	Fiona Blatcher
Final Accounts report	August 2005	November 2005	Fiona Blatcher
Governance report including financial management	February 2005	June 2005	Fiona Blatcher
			Fiona Blatcher
Financial systems implementation report	To be agreed	To be agreed	Fiona Blatcher
Performance information report	June 2004	August 2004	Fiona Blatcher
Annual audit and inspection letter, (including CPA improvement report)	October 2005	November 2005	Mike Thomas

## The Audit Commission's requirements in respect of independence and objectivity

Auditors appointed by the Audit Commission are subject to the Code of Audit Practice (the Code) which includes the requirement to comply with Statements of Auditing Standards (SAS) when auditing the financial statements. SAS 610.3 requires auditors to communicate to those charged with governance, at least annually, all relationships that may bear on the firm's independence and the objectivity of the audit engagement partner and audit staff.

The SAS defines 'those charged with governance' as 'those persons entrusted with the supervision, control and direction of an entity'. In your case the appropriate addressee of communications from the auditor to those charged with governance is the Audit Committee. The auditor reserves the right, however, to communicate directly with the Executive on matters which are considered to be of sufficient importance.

Auditors are required by the Code to:

- carry out their work with independence and objectivity
- exercise their professional judgement and act independently of both the Commission and the audited body
- maintain an objective attitude at all times and not act in any way that might give rise to, or be perceived to give rise to, a conflict of interest
- resist any improper attempt to influence their judgement in the conduct of the audit.

In addition, the Code specifies that auditors, or any firm with which an auditor is associated, should not carry out work for an audited body, which does not relate directly to the discharge of the auditors' functions if it would impair the auditors' independence or might give rise to a reasonable perception that their independence could be impaired. If auditors are satisfied that performance of such additional work will not impair their independence as auditors, nor be reasonably perceived by members of the public to do so, and the value of the work in total in any financial year does not exceed a de minimis amount (currently the higher of £25,000 or 20% of the annual audit fee), then auditors (or, where relevant, their associated firms) may undertake such work at their own discretion. If the value of the work in total for an audited body in any financial year would exceed the de minimis amount, auditors must obtain approval from the Commission before agreeing to carry out the work.

The Code also states that the Commission issues guidance under its powers to appoint auditors and to determine their terms of appointment. The Standing Guidance for Auditors includes several references to arrangements designed to support and reinforce the requirements relating to independence, which auditors must comply with. These are as follows:

- any staff involved on Commission work who wish to engage in political activity should obtain prior approval from the Partner or Regional Director
- audit staff are expected not to accept appointments as lay school inspectors
- Firms are expected not to risk damaging working relationships by bidding for work within an audited body's area in direct competition with the body's own staff without having discussed and agreed a local protocol with the body concerned
- auditors are expected to comply with the Commission's statements on firms not providing personal financial or tax advice to certain senior individuals at their audited bodies, auditors' conflicts of interest in relation to PFI procurement at audited bodies, and disposal of consultancy practices and auditors' independence

- auditors appointed by the Commission should not accept engagements which involve commenting on the performance of other Commission auditors on Commission work without first consulting the Commission
- auditors are expected to comply with the Commission's policy for both the District Auditor/Partner and the second in command (Senior Manager/Manager) to be changed on each audit at least once every five years with effect from 1 April 2003 (subject to agreed transitional arrangements)
- audit suppliers are required to obtain the Commission's written approval prior to changing any District Auditor or Audit Partner/Director in respect of each audited body
- the Commission must be notified of any change of second in command within one month of making the change. Where a new Partner/Director or second in command has not previously undertaken audits under the Audit Commission Act 1998 or has not previously worked for the audit supplier, the audit supplier is required to provide brief details of the individual's relevant qualifications, skills and experience.

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**Meeting of:** AUDIT COMMITTEE

**Date:** 26TH OCTOBER 2004

**Report of:** HEAD OF LEGAL SERVICES

**Reference:** HLS

**Title:** CONSTITUTIONAL ARRANGEMENTS FOR THE EXERCISE OF THE COUNCIL'S LICENSING FUNCTIONS

### **PUBLIC/EXEMPT ITEM**

This item is for consideration in the public part of the meeting.

### **PURPOSE OF THE REPORT**

To enable the Committee to consider the appropriate constitutional arrangements for the exercise of the Council's Licensing functions.

### **RECOMMENDATIONS**

**That the Committee makes recommendations to full Council on its preferred option, and that Council be requested to instruct the Monitoring Officer to make the appropriate amendments to the Constitution.**

### **REPORT**

#### **Background Information**

***This report is being considered by the Licensing Regulatory Committee at its meeting on the 7th October 2004, and its views will be reported to this Committee at the meeting.***

The Council currently has a Licensing Regulatory Committee, comprising thirteen members on PR, which deals with all the Council's licensing functions which are expressed by the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 not to be functions of the executive.

Most of the items referred to the Regulatory Committee relate to hackney carriage and private hire vehicle licensing and, to a lesser extent, public entertainment licensing. Occasionally, the Committee considers items relating to such matters as animal boarding establishments, caravan site licences, and street collections. The terms of reference of the Committee also encompass a wide variety of other areas of licensing, for example second hand goods dealers, motor salvage operators, and miscellaneous public health registrations relating to dairy, meat and fish products. Such matters are routinely administrative, and generally do not need to be referred to the Committee.

The Regulatory Committee also has a sub-committee which deals with appeals against the award of penalty points on hackney carriage and private hire licences.

Under the Licensing Act 2003, a new licensing regime is being implemented. Responsibility for liquor licensing passes from the Licensing Justices to the Council, and under the Act, premises will have a single licence which will cover the sale and supply of alcohol, the provision of regulated entertainment and the provision of late night refreshment. This means that the public entertainment and late night refreshment house licences currently issued by the Council will be subsumed in the new premises licence.

Transitional licences will need to be issued by the Council from the 7th February 2005, and the Act is likely to be fully in force by November 2005. It is necessary therefore for the Council to have the appropriate constitutional arrangements in place before February 2005. In practice, because it will be necessary to address Members' training needs before then, it would be preferable to establish the necessary Committee or Committees as soon as possible.

### **Requirements of the Licensing Act 2003**

Under the Act, the Council is the licensing authority, and the "licensing functions" are the Council's functions under the Act.

Under Section 6 of the Act, the licensing authority is required to establish a licensing committee consisting of at least ten, but not more than fifteen, members of the authority. All matters relating to the discharge of the Council's licensing functions, that is, its functions under the Licensing Act 2003, with the exception of the determination and development of the licensing policy, are to be referred to this Committee.

Further, the authority may decide that its licensing committee will discharge additional functions of the authority that are "related to" its licensing (that is, Licensing Act 2003) functions. If a licensing authority chooses to discharge such related functions itself rather than to arrange for the licensing committee to discharge them, it must consider any relevant report prepared by the licensing committee before acting in any such matter (unless urgent). This ensures that the licensing committee will have an input into any matter relating to the authority's Licensing Act 2003 functions. It is also clearly stated in the guidance to the Act that relevant reports from other committees must be considered by the licensing committee and vice versa.

Section 9 of the Act permits a licensing committee to form one or more sub-committees, each comprising three members of the committee. Regulations made by the Secretary of State may deal with such matters as the proceedings of the licensing committee or its sub-committees and public access, publicity, agendas and records. The licensing committee can sub-delegate the exercise of its functions to a sub-committee or officer.

Functions in respect of which representations or objections have been made may not be delegated to an officer and must be dealt with by either the licensing committee or sub-committee. Appendix A details a proposed delegation of functions based upon the guidance produced by the Secretary of State for Culture, Media and Sport, issued under Section 182 of the Licensing Act 2003.

Some draft Regulations under the Licensing Act 2003 have been published and are presently subject to consultation. However, they do not deal specifically with the composition of the committee and sub-committees. At this stage, it is thought that neither a committee nor sub-committee established under the Licensing Act 2003 is required to have

its membership based on PR. Indeed PR on a membership of three would be extremely difficult.

Further consideration will also need to be given in due course as to whether or not it is appropriate for a sub-committee to include a member for the ward in which the applicant premises is situated. It is not clear whether or not this will be dealt with in Regulations.

### **Proposals and Options**

Some local authorities have decided to have a single Committee to deal with both the Licensing Act 2003 functions and also the residual licensing work. Others are having two separate committees. Legally, there appears to be no right or wrong approach, although there may be difficulties on the applicability of PR, given that the Licensing Act 2003 committee is a special statutory committee and PR seems not to apply to it or to its sub-committees. The residual licensing functions, however, are ordinary Council functions, and any Committee would be an ordinary Committee under Section 102 of the Local Government Act 1972, to which PR would apply.

There will clearly be a considerable workload under the Licensing Act 2003 from February 2005, and in particular for the sub-committees that will consider individual applications.

The current work of the Licensing Regulatory Committee will also continue. The Regulatory Committee's workload with regard to taxi licensing will be ongoing. Its workload with regard to public entertainment licences will continue until November 2005. This means that the main substance of the Regulatory Committee's work will be taxi licensing, and in particular driver applications. Officers have for some time thought that the current Regulatory Committee of thirteen is somewhat large and unwieldy for dealing with such applications, and is a somewhat daunting forum for an individual applicant who will generally be unrepresented. A preferable number for dealing with such applications would perhaps be a maximum of seven.

Accordingly, the following options are set out for Members' consideration:

#### **Option 1**

A Committee to be known as the Licensing Act 2003 Committee, to comprise fifteen members on PR, and to discharge the Council's functions under the Licensing Act 2003.

Sub-committees of three would need to be established as set out in the Licensing Act 2003 to deal with contested applications.

A separate Committee to be known as the Licensing Regulatory Committee, to comprise seven Members on PR, to deal with the Council's residual licensing functions, as at present.

In conjunction with this option, it is recommended that the Penalty Points Appeal Sub-Committee should be disbanded, and that appeals against the award of penalty points should be dealt with by the Council's Appeals Committee. Officers have been concerned for some time that, on the current arrangements, if points are upheld by the Sub-Committee, and the licence holder subsequently appears before the full Committee having exceeded twenty points on the licence, the same Members who upheld the points may be considering whether to revoke or suspend the licence because of those points. This could be perceived as contrary to the principles of human rights and natural justice, and it would be preferable for a separate body to be considering the appeals.

The advantage of this option is that it is clearer constitutionally. Also, Members would be able to develop an expertise in either the Licensing Act 2003 or residual Licensing Act functions. However, there would be nothing to preclude Members from sitting on both Committees should they have sufficient time to devote to both.

### Option 2

One Licensing Committee with 15 members on PR, with terms of reference to deal with all the Council's licensing functions, both under the Licensing Act 2003 and residual licensing.

Sub-committees of three would need to be established as set out in the Licensing Act 2003 to deal with contested applications.

The full Committee would deal with the residual licensing work. There could be a Sub-Committee to deal with penalty points appeals or this work could be transferred to the Appeals Committee as suggested in Option 1 above.

The disadvantages of this option are that a Committee of fifteen is somewhat unwieldy to deal with individual taxi matters. Also, as both a statutory Committee and a Committee of the Council, the Committee would be a hybrid.

### Option 3

As Option 2 above, but with a PR sub-committee of seven to deal with the residual licensing work.

The advantage of this would be that a group of seven is perhaps the optimum number to deal with individual applications. A larger number is too unwieldy.

The disadvantage of this option is that the full Committee would be a hybrid of ordinary and statutory committee. Its Licensing Act sub-committees would not need to be PR, but the residual licensing sub-committee would need to be PR.

### Officers' Preferred Option

The preferred option of the Head of Legal Services is Option 1, as it is constitutionally more clear, and separates the Licensing Act 2003 to be dealt with by a statutory committee, and the residual functions to be dealt with by an ordinary committee.

Whichever option is approved, it is recommended that the number of Members on the Licensing Act 2003 committee should be the statutory maximum of fifteen, to provide the largest possible pool of Members to form the Sub-Committees of three. Further consideration will need to be given in due course to how the membership of the sub-committees is to be determined, and the arrangements to be made to ensure that each sub-committee is quorate.

Also, whichever option is approved, it is recommended that because of the specialist nature of the work under the Licensing Act 2003, the Council's normal rules on allowing substitute members should not apply to the committee carrying out the Licensing Act 2003 functions. It should also be a requirement that Members should not participate in Licensing Act 2003 or residual licensing work until they have received appropriate training.



**FINANCIAL IMPLICATIONS**

The Independent Remuneration Panel would need to consider any Special Responsibility Allowances arising from the chosen option, and this could lead to a recurring increase in the City Council's Revenue Budget.

**LEGAL IMPLICATIONS**

The report has been prepared by the Head of Legal Services.

**COMMUNITY SAFETY IMPLICATIONS**

None

**HUMAN RIGHTS ACT IMPLICATIONS**

All individual applicants must be given a fair hearing in accordance with the Human Rights Act 1998, and the Convention rights of third parties must also be respected.

**RACIAL EQUALITY AND EQUAL OPPORTUNITIES IMPLICATIONS**

None

**SUSTAINABILITY IMPLICATIONS**

None

**MONITORING OFFICER'S COMMENTS**

The Monitoring Officer has been consulted and has no further comments to add.

**SECTION 151 OFFICER'S COMMENTS**

The Section 151 Officer has been consulted and has no further comments to add.

**BACKGROUND PAPERS**

None

## APPENDIX A

<b>Matter to be dealt with</b>	<b>Full Committee</b>	<b>Sub Committee</b>	<b>Officers</b>
Application for personal Licence		If an objection made	If no objection made
Application for personal Licence with relevant unspent Convictions		All cases	
Application for premises Licence/club premises Certificate		If a representation made	If no representation made
Application for Provisional statement		If a representation made	If no representation made
Application to vary premises licence/club premises certificate		If a representation made	If no representation made
Application to vary designated premises supervisor		If a police objection	All other cases
Request to be removed as designated premises supervisor			All cases
Application for transfer of premises licence		If a police objection	All other cases
Applications for interim authorities		If a police objection	All other cases
Application to review premises licence/club premises certificate		All cases	
Decision on whether a complaint is irrelevant frivolous vexatious etc.			All cases
Decision to object when Local Authority is a Consultee and not the relevant authority considering the application.		All cases	
Determination of a Police objection to a temporary event notice.		All cases	

**Meeting of:** AUDIT COMMITTEE

**Date:** 26 OCTOBER 2004

**Report of:** INTERNAL AUDIT MANAGER

**Reference:** aud/audcomm/261004

**Title:** REGULATION OF INVESTIGATORY POWERS ACT 2000

### **PUBLIC/EXEMPT ITEM**

This item is for consideration in the public part of the meeting.

### **PURPOSE OF THE REPORT**

To update the Committee on progress regarding the Council's arrangements for managing surveillance activity under the Regulation of Investigatory Powers Act 2000 (RIPA).

### **RECOMMENDATIONS**

- 1. That the report is noted**

### **REPORT**

#### **Introduction**

The Regulation of Investigatory Powers Act 2000 (RIPA) came into force on 25<sup>th</sup> September 2000 to regulate the use of covert surveillance by, amongst others, local authorities. Surveillance carried out in accordance with the authorisation mechanism established by RIPA gives local authorities express statutory protection against breach of privacy claims under the Human Rights Act 1998.

The Council's policy on RIPA was formally approved by Cabinet on 26<sup>th</sup> November 2002.

#### **Report**

At the March 2004 meeting of the Committee, Members of the committee were informed of the results of an audit of RIPA procedures undertaken by the former Senior Solicitor, Looqman Desai. The main purpose of the audit had been to monitor compliance with the policy and to help the Corporate Director (Central Services) ensure effective quality control of RIPA processes. A copy of the policy is available on the Council's Intranet under the "Corporate Forms" section.

The Senior Solicitor's report had concluded that, whilst covert surveillance operations had been properly supported by obtaining the appropriate level of authority, there were a number of areas in which record-keeping and monitoring procedures could be strengthened. These had related to:

- A central register containing copies of all RIPA authorisations and related forms being maintained by the Corporate Director (Central Services);
- Greater diligence in complying with the time-limits relating to the review, renewal and cancellation of authorisations, as set out in the Act and the Council's policy;
- The provision of more detailed and specific information on application forms regarding the necessity for, and purpose of the surveillance;
- The maintenance of a central record of surveillance carried out by the Police with the use of the Council's CCTV systems;
- The provision of quarterly "status" reports regarding both the Council's own RIPA authorisations and the Police's CCTV-related authorisations to the Corporate Director (Central Services).

It was reported to the Committee that all of these matters had been attended to following the report and that Internal Audit would monitor progress through the maintenance of a computerised register of authorisations and the provision of monitoring information to the Corporate Director (Central Services).

Internal Audit has issued quarterly status reports to the Corporate Director (Central Services) regarding the Council's use of RIPA authorisations. The overall statistics for the year ended 31 March 2004 and the half-year ended 30 September 2004 are summarised below. Monitoring information regarding the Police's use of CCTV for RIPA based surveillance was still being collated at the time of writing.

Service/Section	Year Ended 31/03/04		Half-Year Ended 30/09/04	
	Authorisations Raised	Number Active at 31/03/04	Authorisations Raised	Number Active at 30/09/04
Environmental Health	5	0	6	3
Internal Audit	1	0	0	0

*Note: The above statistics refer entirely to authorisations to undertake "Directed Surveillance". The Council has made no use of "Covert Human Intelligence Sources" during these periods.*

Environmental Health's use of RIPA authorisations has related exclusively to the installation of Digital Audio Tape (DAT) recorders to help investigate noise nuisance complaints. The Internal Audit authorisation raised during 2003/04 related to an investigation into the alleged misuse of the Council's Internet service.

The central database maintained by Internal Audit also promotes compliance with RIPA regulations by highlighting review and renewal dates for live authorisations. Whilst there has been an improvement in the standard of record keeping and submission since the Senior Solicitor's audit, some time limits for reviews have been missed and/or required information omitted from the standard forms. It should be stressed that none of these omissions invalidated any of the authorisations. The Internal Audit Manager has reiterated to relevant managers the need for diligence in complying with these issues and will continue to monitor the position.

**FINANCIAL IMPLICATIONS**

None arising from this report

**LEGAL IMPLICATIONS**

Legal issues are dealt with in the body of the report.

**MONITORING OFFICER'S COMMENTS**

The Monitoring Officer has been consulted and can confirm that regular monitoring reports are prepared and reviewed to check compliance with the Council's RIPA policy..

**SECTION 151 OFFICER'S COMMENTS**

The Section 151 Officer has been consulted and has no further comments.

**BACKGROUND PAPERS**

Regulation of Investigative Powers Act 2000 – A Working Policy

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**Meeting of:** AUDIT COMMITTEE  
**Date:** 26 OCTOBER, 2004  
**Report of:** CHIEF EXECUTIVE  
**Reference:** GH  
**Title:** MEDIA GUIDELINES PROTOCOL

#### **PUBLIC/EXEMPT ITEM**

This item is for consideration in the public part of the meeting.

#### **PURPOSE OF THE REPORT**

To present to the Committee the updated Media Guidelines Protocol, to replace the old version in the constitution.

#### **RECOMMENDATIONS**

**That Council be recommended to approve the updated Media Guidelines Protocol for inclusion in the constitution as a replacement to the old version.**

#### **MEDIA GUIDELINES UPDATE**

Members will recall that the Media Guidelines, which form part of the constitution, were updated at the last Audit Committee meeting in July.

Since then a number of minor amendments have been required, in the main to ensure consistency with the new overview and scrutiny function. The Guidelines have therefore now been updated (changes highlighted) and need to be formally approved for inclusion in the constitution as a replacement to the old version. Members are asked to endorse the proposed changes and refer them to Council for formal adoption.

#### **FINANCIAL IMPLICATIONS**

None directly arising.

#### **LEGAL IMPLICATIONS**

Legal Services has been consulted and has no further comments to add

#### **COMMUNITY SAFETY IMPLICATIONS**

None

**HUMAN RIGHTS ACT IMPLICATIONS**

None

**RACIAL EQUALITY AND EQUAL OPPORTUNITIES IMPLICATIONS**

None

**SUSTAINABILITY IMPLICATIONS**

None

**MONITORING OFFICER'S COMMENTS**

The Council's Constitution includes the Media Guidelines as a local protocol to supplement its Codes of Conduct. It is best practice to regularly review existing local protocols and this report suggests recommended changes to consider prior to being referred to full Council for their endorsement.

**SECTION 151 OFFICER'S COMMENTS**

The Section 151 Officer has been consulted and has no comments to add.

**BACKGROUND PAPERS**

Media Guidelines





**LANCASTER CITY COUNCIL**  
*Promoting City, Coast & Countryside*

# **MEDIA GUIDELINES**

**Gill Haigh  
Communications Manager**

**October 2004**

## **Aims and Objectives**

The long-term aim of the Council's Communications Strategy is to build and maintain a positive reputation for Lancaster City Council in the eyes of the public, its Councillors and employees as well as key partners in the public, private and voluntary sectors.

In order to achieve this aim a key area of our focus is on the local media.

Research carried out by MVA in the Lancaster District in 2002 found:

- 71% of residents cited the local press as the main way in which they currently received information about the Council
- 22% cited local radio.

When asked how they would like to receive information about the Council the local media was the most popular choice, followed closely by Council leaflets through the door and a Council newspaper

The media therefore plays a huge role in informing residents about what the council does and how it spends their money. In return, it's important the city council communicates effectively with this key provider of public information.

In doing so our objectives are to:-

- enable the Council to be one which is open, accountable, accessible and which listens;
- give information about the Council's policies and services and the democratic process so people feel more informed about the work of the Council;
- build up the Council's role as community leader and advocate for the community;
- handle negative issues clearly and decisively. Where we feel criticism of the Council is unfair we should use opportunities available to explain our case, either to the editors or to the readers/listeners. In cases where we are wrong we should hold our hands up and move the story forwards eg explain how we have already addressed the issues;
- improve the employees' view of the Council. Many employees base their views of the Council on what they read in the paper. We recognise our staff can be our best ambassadors. Therefore, in addition to improvements in internal communications, it is vital that all external communication regarding the Council bears this factor in mind.

Of course, this will require input on various fronts and ties in with the wider Communications Strategy as well as the Consultation Strategy

This document sets out guidelines for:-

- 1. Dealing with media enquiries**
- 2. Generating media interest**
- 3. Developing relationships with the local media**
- 4. Managing negative issues**
- 5. Monitoring and evaluating the media coverage of the Council**
- 6. Providing media support to our partners**

## **1. Co-ordinating Media Enquiries**

The Council should ensure that local citizens are informed about the Council's policies, services and decisions. It must be open and transparent in its dealings with the press.

The City Council receives approximately 1,200 enquiries from the media every year and issues approximately 500 press releases. It also organises dozens of press launches and photo opportunities. In order to co-ordinate and manage all of this activity it is important that it is all channelled through a central point, the Communications Office.

### *Media Enquiries - Officers*

The Communications Officer, with support from the Communications Manager, will act as one-stop shop for all media enquiries. This will involve taking the enquiry, working with relevant Officers/Councillors to agree a response and then the Communications Team passing that response back to the relevant journalist.

Occasionally, the Communications Team will ask an Officer to talk directly with the media, for example to explain a technical issue or to give an in-depth background for a feature.

If you are approached for a comment by the media, other than on an occasion agreed with the Communications Team, please refer the journalist to the Communications Officer.

### *Media Enquiries – Councillors*

Where the journalist requires a quote from a politician, the Communications Officer will inform them of the appropriate Cabinet Member/Overview and Scrutiny Board Chairman/Task Group Chairman or Committee Chairman

## **2. Generating Media Interest**

There are a number of ways of generating media interest – press releases, press launches, photo opportunities etc. The most commonly used form is the press release

### ***i) Press Releases***

In co-operation with the Communications Officer, Services should adopt a proactive approach to issuing service-specific press releases.

Press Release writers should follow the Press Release Writing Guide available on the intranet.

Other than in exceptional circumstances all press releases should include just one quote (see below for guidance on who to quote).

Other than in exceptional circumstances all releases should be emailed to the Communications Officer who will place them on the corporate template and issue them to the relevant media via the Newsflash Media Monitoring system. The Communications Officer will also place them on the website and intranet.

All press releases, and any other form of communication with the media, should be cleared with the Communications Officer and, if appropriate, relevant Cabinet Members. In the case of matters relating to Overview and Scrutiny Function, Planning, Licensing and the Standards Committee, they should be cleared with the Communications Officer and relevant Chair.

All media enquiries relating to that press release should be channelled through the Communications Office who will work with the appropriate Officer to put together an agreed response.

## *Press Releases Ahead of Cabinet/Committee/Council Consideration*

The media "pick up" many stories from agendas and reports ahead of meetings. Whilst it would be inappropriate to offer a "comment" by the Council ahead of quasi judicial meetings, such as Licensing and Planning, it is appropriate for:

- A Cabinet member who has submitted a report for the public part of a Cabinet meeting to issue a release or statement ahead of that meeting
- For the chair of Overview and Scrutiny Committee, Budget and Performance Panel and Task Groups to issue a release or statement ahead of one of these meetings.

However these comments should be limited to providing information rather than anticipating an outcome or expressing a view as to a preferred outcome from the meeting.

It is also appropriate for Officers to issue a statement/s outlining a summary of a report. In this way reporters will be more likely to use the readily provided Council statement which provides a brief and accurate summary of a report or clarification of an issue.

Of course, there is no reason why a political group or political representative should not make a comment, should they wish to do so.

The Communications Officer and Service Heads will liaise before agendas and reports are issued to the media to discuss whether such an approach is required regarding specific items

## *Press Releases Following Cabinet/Overview and Scrutiny Committee/Task Group/Committee & Council Meetings*

When relevant Corporate Directors, Service Heads, appropriate Cabinet members, chairs of Overview and Scrutiny, Budget and Performance, Task Groups and Committees and the Communications Officer will liaise at the report deadline stage to discuss issuing positive press releases following a meeting. It is important that press releases are issued to the media as soon as possible after the conclusion of a meeting - not normally more than 24 hours after the conclusion of a meeting. (See below for who should act as spokesperson).

## *Press Releases Requested by Councillors*

It is perfectly acceptable for a Cabinet Member/Overview and Scrutiny Chairman, Task Group chair or Committee Chairman to request an Officer to produce a press release relating to their role outlined above.

However, Officers should not produce press releases for Councillors on individual ward or party political issues or in advance of a decision of a properly constituted councillor meeting.

## *Logos*

The City Council Logo forms part of the Press Release template and therefore all Council press releases carry the Council logo and crest. However, when issuing a press release with a partner it may be appropriate to create another press release template carrying both the Council logo and the logo/s of the other partner/s involved.

## *Equal Opportunities and Race Equality Policies*

When drafting press releases or selecting photographs, all Officers should be mindful of the Council's Equal Opportunities and Race Equality Policies  
Publicity should avoid stereotyping of roles and should demonstrate the Council's commitment to providing equality of services and opportunities to people of either sex, any colour, sexuality, all races and people with disabilities

Advertisements and information about services should be circulated widely and, wherever necessary, communicated in appropriate community languages

### **ii) Who should act as official spokesperson?**

#### *Technical/Factual Information*

When providing information of a technical/factual nature (such as planning technicalities, new Benefits policies) on a topic yet to go to Cabinet/Overview and Scrutiny/Committee/Council, which has been to one of the above or which does not go to any of them, it is appropriate to use an Officer

#### *Commenting on an Issue*

Where a comment is required on a subject that has been to Cabinet/Overview and Scrutiny/Task Group/Committee/Council then the relevant Cabinet Member, Overview and Scrutiny Chairman/Committee Chairman, Task Chairman or Council Chairman will normally act as the Council's Spokesman.

If the appropriate Member is not available/contactable for interview at the requested time it may be appropriate to use an Officer. In these circumstances Officers must clear this with the Communications Team before giving any interviews.

#### *Partners*

Where the Council is involved in issuing a press release as part of a partnership arrangement eg the Community Safety Partnership, the Partnership's arrangements for who to quote should be followed. This would normally be the Chair of that organisation. **In the case of a press release being prepared on behalf of a number of partners it may be appropriate to offer each partner an opportunity to be quoted.**

#### *Political*

If it is necessary, from a factual point of view, for a press release to identify by name one or more of the political Groups on the Council, then either a Spokesperson for that political Group(s) should be provided with the opportunity to comment in the press release issued on behalf of the Council or no politicians should be quoted at all. Group Leaders contact details will normally be provided to the media on request and Political Groups will determine their own spokespersons

### **iii) Media Events/Launches/Receptions**

Anyone organising an event to which the media is to be invited should liaise with the Communications Team in the first instance, providing details of times, venues and who is being invited. This will ensure that the no two events are taking place at the same time. In this way we will reduce the risk of spreading the media too thinly and maximise opportunities of gaining positive publicity. In addition it will ensure the Communications Team is fully up-to-speed in the event of any media enquiries.

Each occasion will require a different audience but, in general, one or more of a combination of the following would normally be invited: Cabinet Member, Chairman of the Overview and Scrutiny Committee, Chairman of the Regulatory Board, Ward Councillor(s)

Guidelines to assist Officers setting up a media reception etc are available on the intranet. The Communications Team is also happy to help.

***iv) Photo Opportunities***

*Creating Photo Opportunities*

The general rule is that where photo opportunities arise the relevant Councillors are invited. Depending on the issue this could be one or a combination of the following: Cabinet Member, Chairman of Overview and Scrutiny Committee, Chairman of the Regulatory Board, Ward Councillor(s).

However, our goal is to achieve positive publicity for the Council as a whole and therefore some degree of flexibility is necessary in order to achieve that goal.

For example, photographic opportunities often arise at short notice. By needing to contact the relevant Councillors to arrange a time when all can be present, there are times when a photo opportunity and therefore positive publicity may be lost

There are also times when it is appropriate to include Officers for photo opportunities (see examples below).

There are also times, depending on the story, when the photographer may wish to reduce or increase the number of people who'd normally be invited to take part in a photo opportunity.

Anyone organising a photo opportunity should liaise with the Communications Officer to discuss how it should be handled

**Example a:**

Photograph as a result of a Cabinet/Committee/Overview and Scrutiny/Regulatory Committee Meeting:

The appropriate Cabinet Member/s and Overview and Scrutiny Chairman/Task Group/Regulatory Committee Chairman would normally be invited.

**Example b:**

Large/high profile events eg Bus Station Launch, Millennium Bridge Launch etc. Appropriate Cabinet, Overview and Scrutiny Chairmen and Regulatory Committee Chairmen and Ward Councillor/s would normally be invited.

**Example c:**

Civic-related photo opportunities eg Council signing up to a charter/declaration/handing over a cheque/receiving a cheque etc. The Leader of the Council or appropriate Cabinet Member and the Mayor or Deputy Mayor should be invited to act as representative of the Council

**Example d:**

Quirky photo opportunity to highlight a Council story/not high profile issue eg Environment Co-ordinator distributing Local Agenda 21 Consultation by bike or launch of Town Hall Tours, Children's Festival – Officers and/or Leader of the Council or appropriate Cabinet Member would normally be invited

Details of any photo opportunities should also be cleared with the Communications Officer ahead of any invites being sent out to the media.

*Taking Photos for the Media*

On occasions the media will not be able to turn up to a photo opportunity but will accept contributed photographs. For advice about taking photographs for the media please contact the Communications Office. Similarly photographs should be submitted to the media via the Communications Office.

**v) Campaigns/Sustained Coverage of Topic**

The Service Head and the Communications Officer will liaise to discuss the potential for sustained coverage of topics eg Recycling, the Regeneration of Morecambe, Luneside East

By drawing up a media strategy/campaign on a particular topic the Council can pinpoint what particular aspect it wants coverage of and more accurately time when it wants any coverage to appear in the media

Such a campaign can be targeted generally at all/majority of the local media locally or it can be targeted at a specific newspaper/radio as a 'joint' Council/newspaper and/or radio campaign

**vi) Success Stories**

All Officers should play their part in keeping the Communications Officer up-to-date on success stories eg successful grant bid, completion of a project, employee development etc

**vii) Human Interest Stories**

The media are always interested in 'human interest' stories. These might not relate specifically Council issues but are nevertheless an important tool in building up a positive image of the Council, its Councillors and employees and making us appear 'human' to those outside the Council

Examples of human interest stories: Unusual hobbies of individuals, special achievement of an individual eg first woman refuse collector, member of staff marrying another member of staff, bizarre holiday location/experience, two sets of twins born to staff on same day etc

Officers and Councillors should take the initiative to inform the Communications Officer of relevant stories.

**viii) Mayoral Publicity**

The Communications Officer and Member Services will work closely to encourage increased publicity for mayoral activities. This will include:

The continued publication of the Weekly Mayoral List

A weekly press release highlighting the key events in greater detail - to be sent to all media

Asking the Mayor to alert us to any unusual/interesting experiences/incidents/events she comes across in her duties

Enabling the mayor to become more "interactive" in terms of photo opportunities whilst always recognising the need to maintain and follow the mayoral protocol

### **3. Developing Relationships with the Media**

The City Council's Communications Team is in contact with a vast array of media from local papers to national and international television stations. However, the main day-to-day contact is with the local media:

Lancaster Guardian  
Morecambe Visitor  
Lancaster and Morecambe Citizen  
Lancashire Evening Post  
Westmorland Gazette  
Bay Radio  
Radio Lancashire  
Granada Television  
BBC North West  
Virtual Net (local web based newspaper)

The Council's relationships with the local media are generally good. Take up of press releases is high and the percentage of media requests for Council comments is, on the whole, good and improving. However, it is important to maintain and develop our relations with the media and to be responsive to their changing needs.

#### *i) Deadlines*

If we want a chance of getting our side of the story included in the media it's imperative that we meet the deadlines we are given. Further information on the local media deadlines is available from the Communications Section of the Intranet, but a basic rule of thumb is that all Officers contacted by the Communications Team regarding a media enquiry should treat it as a priority.

#### *ii) Meet the Media Events*

An annual Meet the Media event will continue to be held to introduce new Cabinet Members/Review Board and Committee Chairmen to the media.

#### *iii) Media Briefings/Press Launches*

When relevant, media briefings should be arranged, to brief the press on an issue of importance to the public eg new Licensing Regulations, Comprehensive Performance Assessment, Budget etc. This will also provide an opportunity for lead Officers and Councillors to build relations with the media.

Officers organising a media briefing or press launch should liaise with the Communications Officer regarding the organisation of the event.

#### *iv) Annual Media Survey*

An annual survey of the local media will continue to be carried out to ascertain the media's views on the level of service the Council provides and to learn how they feel we could improve that service.

#### *v) Councillor Contacts*

A Council 'contacts' list of the Leader of the Council, Cabinet Members, Review Board Chairmen and Committee Chairmen will be prepared and circulated to the local media. Photographs of all Councillors will also be provided to the photography departments of the local media.

#### *vi) Media Awareness Training*

In-house Media Awareness Training courses are provided to all interested staff (please contact the Training Officer for more details). This helps to improve the overall quality of service provided by the Council to the media.



#### **4. Managing Negative Issues**

From time-to-time the Council has to respond to negative issues. It is important that we 'manage' these situations so as to limit the potential for negative publicity.

##### *i) Alerting the Communications Team*

When Management Team and/or Service Heads become aware of a potentially damaging/negative issue they should immediately alert the Communications Officer.

Service Heads and the Communications Officer should work together to prepare an appropriate position statement/response. Wherever possible this should be done ahead of a story breaking. The response can then be used, if the potentially damaging issue is to be used by the media. In order to ensure that the Council's position is outlined to Councillors, briefings on difficult issues should be circulated to appropriate Councillors and staff.

##### *ii) Developing Database of Briefing Material*

A database with briefing material on a wide range of issues will continue to be developed to assist this process.

##### *iii) Briefing the Media*

On occasion it may be necessary to brief the media personally or to hold a press briefing to 'manage' a breaking story. The Communications Manager will take a decision on this in conjunction with other relevant Officers

##### *iv) Correcting Inaccurate Reporting*

The Council should make every effort to correct inaccurate reporting of Council issues. Discussion with the Communications Officer should take place in order to examine the most appropriate form of action eg personal contact, personal letter to the editor, open letter, legal advice.

Officers should act as spokesperson on any factual information and the relevant Cabinet member should act as spokesperson should a comment be required.

Officers need to respond quickly to requests for information from the Communications Officer to provide an accurate and full briefing of an inaccurate report.

##### *v) When the Council gets it wrong*

Occasionally the Council will get something wrong. In terms of damage limitation the best policy is generally to hold our hands up, apologise and draw a line under the episode by moving the story forward, outlining how we are going to/are already learning from error/how we are putting it right. This kind of situation should be handled in consultation with the Communications Officer

##### *vi) Leaked Items*

Occasionally 'confidential' Council items are 'leaked' to the media.

The Council policy is that normally it does not comment on leaked or confidential items.

However, if an item which is not 'confidential', but which has yet to go into the official public forum eg Cabinet/Review Boards/Council, is 'leaked' it may be appropriate for the Council to issue a comment. Each case will be judged individually.

In both scenarios the Communications Officer should be made aware and be involved in discussions on how to/whether to respond.

##### *vii) Political Issues*

There are occasions where an issue becomes 'political'. In these circumstances an official Council response will not be given but Political Groups can comment directly.

## **5. Monitoring and evaluating**

The Communications Team will continually monitor the media perception of the Council using the aims and objectives set out under aims and objectives section (P2) and a media monitoring software system, Newsflash.

Reports of news coverage, how enquiries and releases have been used (positive, neutral or negative) will be circulated electronically to all Group Leaders, Group Administrators, Cabinet Members/Overview and Scrutiny Chairman and Committee Chairmen, individual members *upon request*, the Chief Executive, Directors and Service Heads on a twice weekly basis.

A more comprehensive report evaluating media coverage will be produced annually.

Detailed monitoring reports, specific to a service or subject, can be provided on request.

Press releases will also be circulated to the above list via e-mail regularly.

All press releases will continue to be posted on the Intranet and website as soon as they are issued.

Copies of all newspapers are available for viewing in the Communications Office. Cuttings of any national coverage or reports of any radio or television interviews should be passed to the Communications Office.