Marketing & Media

Press and Media Protocol

2019

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Introduction

The press and media are essential channels of communication for the Council. Stakeholders [residents, staff, Town and Community Councils and partner organisations] use them as the primary source of information about the Council and its services. Social media is also an important method for residents to access information about the Council and its services, and to contact the Council.

This document has been produced to provide Members and Officers with information on the basic protocol for working with the media as well as clear guidance in their roles and responsibilities.

An effective Press and Media Protocol will assist the Council in providing information, promoting its services and developing its image as an open and transparent organisation that is accountable to the local community. The Council will continue to promote a culture of openness and accessibility towards the media.

This protocol explains the principles that the Council adopts, whilst taking into account the national Code of Recommended Practice on Local Authority Publicity in Wales (the Code). Local Authorities are required to 'have regard to the provisions' of this Code in the way they approach communication.

The Code recognises the political nature of Local Government, and takes into account the fact that some Local Authority publicity will deal with issues which are controversial because of particular local circumstances, or because of a difference of view between political parties locally and nationally. However, the principles do not prohibit the publication of information on politically sensitive or controversial issues, nor stifle public debate. It sets out safeguards and ensures the proper use of public funds for publicity.

The Code points out that the main purposes of Local Authority publicity are to 'increase public awareness of the services provided by the Authority and the functions it performs to allow local people to have a real informed say about issues which affect them; to explain to electors and ratepayers the reasons for particular policies and priorities; and in general to improve local accountability'.

This protocol is designed to provide Officers and Members with clear guidance to follow specifically when dealing with the press and media. It applies to all Officers and Members, and also to arms-length companies and partner organisations when they are delivering services on the Council's behalf.

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Principles and objectives

The Council is committed to effective communications so that residents of the county are well informed about Council services, decisions and developments.
The Marketing and Media team undertakes to maintain a steady flow of information to the media, and operate at all times within the Code.
Aims are:

- To be open, honest, accurate and consistent in dealing with the media and to respond to enquiries within journalists' deadlines whenever possible; to provide an explanation in the event it is not possible.
- Maintain and raise public awareness of the services provided by the Authority and the functions it performs.
- Advance and ongoing publicity on matters of public interest; and to provide public information.
- To give those affected by the Council's decisions, policies and priorities the information to understand them and how to participate in consultation and engagement when relevant.
- To ensure Welsh Language Standards are adhered to at all times.
- To have regard to The Well-being of Future Generations Act.
- To have regard to The General Data Protection Regulation (GDPR) (EU) 2016/679
- To promote and highlight the successes and achievements of the Council and its partners.
- To ensure a co-ordinated response from one single point of contact, the Marketing and Media team.
- To ensure that statements and other material published on behalf of the Council (including on the Council's website) are not party political.

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Media enquiries

All media enquiries made to the Council, in whatever form, are to be managed by the Marketing and Media team.
Any member of staff that is approached by a member of the media should immediately forward the request to pressoffice@carmarthenshire.gov.uk or 01267 224900 (ext 4900) and not engage in conversation to avoid providing unauthorised and or inaccurate information or unintentionally acting as a spokesperson of Carmarthenshire County Council.
The Marketing and Media team will only respond to media enquiries from a recognised media organisation that is properly regulated by IPSO, Impress or similar. This is to ensure there will be a proper process for complaints should the need arise. Email enquiries that do not come from a recognised media organisation (for example @gmail, @hotmail etc) will be required to prove they are representing a recognised media organisation.
The Marketing and Media team will not deal with any enquiries that are of a political nature. In these cases, the journalist will be asked to contact the relevant political party leaders directly.
The team will answer non-political enquiries on behalf of the Leader and Executive Board Members on matters relevant to their portfolio. Where journalists contact Executive Board Members directly they are at liberty to respond however are encouraged to provide the Marketing and Media team with a summary of their response.
The Marketing and Media team will not answer enquiries on behalf of ward Councillors, although will assist by offering advice if required.

Welsh Language Standards

Welsh Language Standards will be met at all times. All enquiries will be dealt with in the language initiated and bilingual statements and speakers will be available at all times. Where the Member or Officer concerned does not speak Welsh, a deputy or colleague should be fully briefed and prepared to carry out Welsh language interviews when required.

Media response times

The nature of today's media environment, in particular the immediacy of online news and social media, means that set deadlines are very rare. In most circumstances, the media will require a response on the same day, or even sooner.
The Marketing and Media team will prioritise enquiries that require an immediate response, and use a categorisation system to decide when and how to engage Senior Officers and the Executive Board.
The Marketing and Media team should be informed of preferred methods of contact to ensure speed of response, and where possible notified when they have appointed a deputy to deal with media enquiries during periods of their absence.
The Marketing and Media team will aim to answer all reasonable requests within the deadline provided, and will liaise with the media to explain if this is not possible. Where request response times are considered unreasonable, this will be discussed with the media organisation involved so that a more reasonable timeframe is agreed. It will not always be possible to respond to the media within their set deadlines.

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Approvals process

The Marketing and Media team uses a process for categorising media enquiries:

Category A
Request relates to a major incident (declared as a Silver/Gold Command), or a matter with implications for serious reputational damage. Approved response required from the Leader and/or relevant Executive Board Member, and Chief Executive and/or Director within one hour, or response coordinated from Silver/Gold Command.

Category B
Request relates to a high profile incident, an opportunity to promote a high profile Council initiative, or a matter with implications for some reputational damage. Answer is not currently in the public domain. Approved response required from relevant Executive Board Member and Director within four hours (unless a specific deadline is specified). Approved statement copied to the Chief Executive.

Category C
Request relates to a topic without a risk of significant reputational damage, or is not related to a Council priority. Approved response required by relevant Executive Board Member and Head of Service/Third Tier Manager within 24 hours (unless a specific deadline is specified).

Category D
Request relates to information already in the public domain, or to a pre-approved statement. Marketing and Media team to issue a response and notify the relevant Executive Board Member and Head of Service/Third Tier Manager.

The Marketing and Media team should be informed of preferred methods of contact to ensure speed of response, and where possible notified when approvals have been delegated to a deputy or another Senior Officer.
Officers within service areas should be prepared to support the Marketing and Media team with information gathering for enquiries, often at short notice, and may be asked to provide bullet points of relevant details. The Duty Press Officer will draft statements/interview briefs based on this information.
In general, it is the responsibility of the Manager or Head of Service to inform their Senior Officer and Executive Board Member of any issues relevant to their department or portfolio. They may also wish to extend this to ward Members, as they feel appropriate.

Statements

Statements will always be attributed to the appropriate Member and/or Senior Officer. The term 'spokesman/spokeswoman' will not be used.
Where matters are of an operational or service-level nature, a statement will be made by the relevant Senior Officer. For all other matters, including matters of policy, statements will be

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made by the relevant Executive Board Member or Committee Chair. Statements will not be made on behalf of ward Councillors.
'No comment' is not an acceptable response, unless it is absolutely unavoidable. It is preferable to give a holding comment if information is not available in time for a media deadline. A holding comment will be non-committal, but will acknowledge that the Council is giving the matter concerned its attention.
In general, the statement will only be provided to the journalist that has requested it. However, if there are several requests on the same topic the statement may be published on the Council's Newsroom, or included as part of a press release for general issue.
Statements issued by the Council carry the legal defence of 'qualified privilege', so long as they are fair and accurate. This defence also extends to verbal statements made by Local Government Press Officers, so long as they are considered comments.

Interviews

Where an interview is requested by the media on a specific topic, this will be offered to the relevant Executive Board Member and/or Senior Officer.
As with statements, where matters are of an operational or service-level nature, interviews can be given by the relevant Senior Officer. For all other matters, including matters of policy, interviews should be given by the relevant Executive Board Member or Committee Chair.
Efforts will also be made to accommodate media requests for a particular officer, or an officer with particular knowledge or experience on a topic (i.e., about biodiversity).
Interviews will always be given in the language requested. Deputies or colleagues should be prepared and briefed to provide Welsh language interviews where the relevant Executive Board Member, Committee Chair or Senior Officer is unable to.
The Marketing and Media team will provide a brief in advance of the interview to give the relevant Member or Officer as much information as possible to allow them to prepare. This should include information, for example, about whether the interview will be live or pre-recorded, whether it will be a direct conversation with a presenter or with a group of people as a debate.
Consideration will be given to location to ensure it is appropriate to the interview topic.
On occasions, the Marketing and Media team may accompany interviews to offer support or give further detail, and reserves the right to terminate interviews if required. Where this is the case, a clear explanation should be provided, and the journalist given the opportunity to re-submit their enquiry or request.

Requests about decisions at Council meetings

Journalists are encouraged to attend public meetings and watch webcasts of meetings (Full Council, Executive Board, Planning Committee, Dyfed Powys Police and Crime Panel). Where an enquiry relates to a debate or decision made at a Council meeting, journalists will be referred to the relevant webcast archive or minutes (when available). No statements will be provided ahead of a debate at a public meeting, instead journalists will be encouraged to attend or watch the webcast/web archive to gather comments from Councillors as part of the debate.

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Detailed requests/Freedom of Information Act

Where a media enquiry asks for heavily detailed information, the Marketing and Media team may suggest that it is submitted via the Freedom of Information Act.
This should only be the case where enquiries cannot be answered through the normal process, where the response may take significantly longer or require a more in-depth process of investigation by the relevant service area.
The team should make contact with the media organisation and explain why it may be necessary to submit the enquiry under the Freedom of Information Act. Where such an agreement is made, the enquiry should be immediately forwarded to the Freedom of Information Officer, and the enquiry will be dated/timestamped at the point on which it was first received by the Marketing and Media team.
The FOIA response should be copied to the Marketing and Media team for its records.

Recording enquiries

All media requests and statements/interviews provided will be digitally recorded by the Marketing and Media team and used for future reference.
This will note a number of details, including the nature of the enquiry, who it was submitted by and when, the response provided, who gave the necessary approval, and explanatory notes.

Out of hours/emergencies

The Marketing and Media team is contactable out of hours in an emergency. Out of hours support will be actioned by the Marketing and Media Manager, Director or Head of Service, or Civil Contingency Officer.
Routine enquiries will only be dealt with during normal office hours.
Where members of the media are seeking assistance in relation to an emergency during evenings and weekends, they should contact the Council's out of hours call provider Llesiant Delta Wellbeing and messages will be forwarded to the Duty Press Officer.
In the event of an emergency, the Marketing and Media team will send a message to media contacts asking that they follow updates on the Council's Newsroom and social media feeds.
In an emergency or ongoing high-profile incident, or where there is widespread disruption owing to extreme weather, the Marketing and Media team will create a 'Situation Update' page on the Council's Newsroom, accessible within the main corporate website.
This will be used as a central place for the publication of news updates throughout the event.
Information will also be shared on the Council's social media feeds.
In most events of this nature, the Marketing and Media team will be involved in tactical or strategic command groups, often working as part of a multi-agency response. Where multi-agency communications are required, agreement should be sought from partners (such as police, Natural Resources Wales etc) wherever possible.

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Press releases

Despite the change in the media landscape, press releases are still an important and effective method of communication.
Press releases will be issued by the Marketing and Media team on an official template from the central email address/inbox 'pressoffice@carmarthenshire.gov.uk' which will give members of the media the necessary reassurance that it is a legitimate press release.
The Marketing and Media team uses a media distribution list of local, regional and national contacts, and has separate distribution lists for specialist topics/trade publications.
All press releases will be published on the Newsroom, on the Council's corporate website.
Press releases will be factual in nature, or in the style of a feature on a particular topic, but will not include anything that could be construed as politically motivated or biased. They will not be used to promote political purposes or parties.
Priority will be given to stories that are high profile, in the public interest, identified as a priority within the Executive Board's forward work programme, or have immediate news value. The Marketing and Media team reserves the right to refuse a request for a press release if it is not newsworthy or does not provide value, in which case they will advise of alternative methods of communication that may provide better coverage or engagement, for example a social media post or a video clip.
Press releases will be written in a 'news style' used by the media to secure maximum coverage.
Press releases issued by the Council carry the legal defence of 'qualified privilege', so long as they are fair and accurate.

Quotes

Where matters are of an operational or service-level nature, the relevant Officer can be quoted – the level of seniority will depend on the nature of the story. For all other matters, including matters of decision-making and policy, the relevant Executive Board Member or Committee Chair will be quoted.
Generally, press releases will not include quotes from ward Councillors although they may wish to speak to the media directly.

Approvals

All draft press releases should be fact-checked with the relevant service area, before being sent to the Service Manager or Head of Service, and relevant Executive Board Member, for approval.
A press release with implications for serious reputational damage, or regarding major incident (categories A and B) should also be approved by the relevant Director or Chief Executive and the Leader.
Approval must also be gained from everyone quoted within the press release.
In general, it is the responsibility of the Manager or Head of Service to inform their Senior Officer and Executive Board Member of any issues of relevance to their department or portfolio. They may also wish to extend this to ward Councillors, as they feel appropriate.

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The Marketing and Media team has specialist experience in writing for press, and may on occasions reject requested amends in favour of retaining news style. A full explanation should be given if this is case.

Welsh Language Standards

All press releases will be issued bilingually.
In the event of an emergency, where Welsh translation is not immediately available, press releases may be issued in English, although a Welsh version must follow at the earliest opportunity. In this event, the press release should include advice that a Welsh language version will follow.

Exclusives/media partnerships

The Marketing and Media team works closely with the media to build relationships and secure coverage and exposure of key issues and campaigns.
In order to maximise coverage on a key topic, the Marketing and Media team may, on occasions, pitch a story idea to a particular media organisation or contact and work with them on an 'exclusive' basis. This should only be applied when there is a clear benefit to the Council, and where the same benefit could not be achieved by treating all media equally, or where a media organisation has asked to cover a particular issue and it would not be of widespread interest to other media outlets.
Any paid-for editorial will be arranged and recorded through the Marketing and Media's advertising account. 'Advertorials' will usually be marked as such. All paid-for editorial content will be bilingual, as per Welsh Language Standards. See later section on advertising.

Embargoes

Although used sparingly, embargoes can be used when journalists may need time to prepare their coverage on a particular issue, or when we are working with a partner organisation to release certain information to the media.
Embargoes are not legally enforceable, although most media outlets will abide by them. These should be discussed with the Director/Executive Board Member as part of the approvals process.

Monitoring coverage

Press cuttings will not be routinely made or kept except in relation to a particular campaign, but back copies of some printed publications will be kept by the Marketing and Media team for up to three months.
Online coverage will also be monitored.
Particularly positive or negative media coverage will be brought to the attention of Officers in the relevant service area and the Executive Board Member.

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Errors/clarifications

Where a mistake or misrepresentation has been made in a media article, the Marketing and Media team will seek a retraction, clarification or apology. This may require intervention from the Council's Legal Services team.
If a satisfactory response is not provided, the Council reserves the right to issue its own clarification, and to publish this on the Newsroom and on social media, and to take any further action required. Attention will be drawn to the Editor's Code of Practice [Appendix A], and if necessary representation will be made to the relevant media regulator (IPSO, Impress or similar).

Covering Council meetings

The Marketing and Media team will cover key decisions made at Full Council and Executive Board. Reports will be factual and will not include any political debate. Any quotes made at these meetings will be used 'verbatim', and therefore will not require approval. Where a statement is made outside of the meeting, and used within the press release, it should be made clear that the comments were made following the meeting, and in this instance approval will be sought from the relevant Member or Executive Board Member.
Press releases will be issued as soon as possible following the meeting.
For all other meetings, the team may issue a press release on a newsworthy topic or by request of the Chair, but information in this instance will be gathered from the agenda and minutes.
Reports of Council meetings carry the legal defence of 'qualified privilege'.

Covering Council-led prosecutions

When the Council has successfully prosecuted an individual, business or organisation, the Marketing and Media team will create a summary report of proceedings, including any mitigation, and details of sentencing.
Reports should be issued as soon as possible following sentencing and approved by the prosecuting solicitor and relevant Head of Service.
Fair and accurate reports of judicial proceedings held in public, and published contemporaneously (as soon as is practically possible), carry the legal defence of 'absolute privilege'. Reports are 'fair and accurate' if they:

- Present a summary of the cases put by both sides
- Contain no substantial inaccuracies
- Avoids giving disproportionate weight to one side or the other

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Media access to Council proceedings/premises

Any requests made by the media to access, film or record on Council premises should be made via the Marketing and Media team. An online form is available on the Newsroom section of the Council website which requires relevant details and a copy of public liability insurance. See later section on video/filming.
Filming of Council meetings will not be permitted unless otherwise agreed with the relevant Chair.
Members of the media will be treated in the same way as members of the public so far as access to public/private meetings and exempt items are concerned. See Local Government Act 2000.

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Elections

The period between the notice of an election and the election itself should preclude proactive publicity in all its forms of candidates and other politicians involved directly in the election. Publicity should not deal with controversial issues or report views, proposals or recommendations in such a way that identifies them with individual Members or groups of Members. However, it is acceptable for the Authority to respond in appropriate circumstances to events and legitimate service enquiries provided that their answers are factual and not party political.

Members holding key political positions should be able to comment in an emergency or where there is a genuine need for a Member level response to an important event outside the Authority's control. Proactive events arranged in this period should not involve Members, AMs or MPs.

Specific guidance and advice is available for staff and Members from the Electoral Services team. This may be shared with the media.

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Events

Generally, events should be organised by the relevant service area. The Marketing and Media team will provide PR support where required, including booking a photographer.
The Marketing and Media team coordinates major events on behalf of the Authority and may organise high profile events that cross a number of departments, where there is an opportunity to raise the profile of the Council, or where the Council's reputation could be at risk.

Events where Councillors are required to attend should be arranged by (or with) the Democratic Services Unit to ensure appropriate information and guidance is available for Members.

See Appendix B (Invitations to a Photo Call) and Appendix C (Invitations to Events) for further guidance.

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Social Media

The Marketing and Media team manage social media on behalf of the Authority overall, although some approved accounts are managed by relevant service areas.
Care should be taken to ensure any information published on social media is accurate, fair, legal and appropriate. The Council's Social Media Policy must be adhered to at all times.
As well as being used as a promotion and engagement method, social media is increasingly used by members of the public to contact the Council. This type of enquiry is handled by the customer service team within Marketing and Media.
Further information can be found within the Council's Social Media Policy and Best Practice Guidelines.

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Photography and Filming

Good quality photography and video are an important element of most Marketing and Media work and almost always ensures greater media coverage and engagement on digital channels, such as websites and social media feeds.

The Marketing and Media team operates a photography framework to commission freelance photographers, therefore it is important that any paid photography work commissioned by any department utilises this framework. The team also records video footage of events or interviews with Members, staff, and members of the public, or commissions a private company to record video on their behalf.

The Marketing and Media team will identify whether photographs or video footage is required to accompany a press release (whether it has news value and is likely to be used by the media) or whether the image or video can be used for marketing purposes (i.e., as part of a tourism campaign). If this is the case, the Marketing and Media team will advise and take the lead on bookings.
Where a photograph or video is not required for the media, or marketing purposes identified by the Marketing and Media team, each service area must arrange and pay for such services using the Council's approved framework.

Photographs for media

Photographs intended for use in the media have the best effect when minimal people are included in the frame. The Marketing and Media team will advise about who should be included in the image. This will usually involve the invitation of the Executive Board Member/s and Senior Officers, as well as any partners (See Appendix B – Invitations to a Photo Call). Priority should be given to the Executive Board Member/s or Senior Officer.
The media may have a particular request for an image, and to ensure maximum coverage we will endeavour to meet their request. This may involve images that don't include Councillors. A brief will be agreed with the department and the photographer in advance.
To ensure Marketing and Media maintains control of images they commission from a framework photographer, no members of staff are permitted to take their own versions of a photograph that has been set up. A copy of the agreed photograph can be sent on the relevant service by Marketing and Media.

Photography and filming for campaigns, reports or graphic displays

Where photographs or video are required to support a particular campaign, or for use in corporate documents or displays, there is no requirement to invite Members or Officers. Anyone commissioning photography or filming for this purpose should seek advice from Marketing and Media team about specific requirements. A brief will be agreed with the department and the photographer/production company in advance.

Providing a clear brief

A detailed brief must be provided for all photography and filming commissions, setting out the expectations from the photographer or production company, both in terms of the images/footage required and the agreed time requirement and cost. A template is available for staff on the Intranet.

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The photographer/production company will only supply images or video as per this agreed brief. Please be aware that further requests made on the day may be subject to extra charges.

Use of images and storage of images and footage – copyright and General Data Protection Regulations (GDPR)

Copyright of all images and video supplied to the Council by commissioned photographers or production companies, or shot by staff during their working day (for work purposes), belongs to Carmarthenshire County Council.

Members of staff who take photographs or video during their working day for work purposes will be required to assign the copyright of their images/footage to Carmarthenshire County Council, and must ensure copyright and GDPR legislation is upheld in the same way as contracted photographers or production companies.

Members of staff are not permitted to use their own personal devices or equipment to download or store images or footage for work purposes to ensure compliance with this legislation.

All members of staff have a legal duty to ensure that any images or footage they use for publicity either belongs to Carmarthenshire County Council, has specific consent for use (implied consent or credit is not sufficient), or is clearly marked as copyright/royalty free. Images or footage must not be downloaded from third-party websites, including Google, and used without permission as this could have legal implications for the Council.

Images or footage sent to the media and shared on websites and social media, should only be used in the context of which they were released. In all cases, copyright will remain with Carmarthenshire County Council.

Anyone included in a photograph or video should give their consent and be given a reasonable explanation about how and where the image/footage might be used. This also applies to members of staff using photographs or video within their own publications or digital platforms, or submitting to the Marketing and Media team for use in corporate publicity. Particular care should be taken when re-using images or footage taken more than six months previous to ensure consent is still in place.

To ensure compliance with copyright and GDPR legislation, all photographs and footage must be stored by the Marketing and Media team together with relevant file information to ease retrieval.

See the Marketing and Media team's Privacy Notice for information about storage and use of photographs and video, in relation to compliance of GDPR.

Requests for photography and filming on Council premises

Any person who is not employed by Carmarthenshire County Council and wants to take photographs or film on Council-owned property and land for the purpose of publicity or to share publicly (whether on a commercial or non-commercial basis) should first seek permission from the Marketing and Media team who will liaise with the relevant Service Manager. The Council will need to be satisfied that there is a legitimate reason for the request, that relevant risk assessments have been undertaken, that there is adequate Public Liability Insurance cover for the activity, and that all necessary consents from members of the public are in place to ensure compliance with GDPR.

An e-form is available on the Council's website for media and external companies to request permission for photography and filming. In all cases, we will endeavour to assist and have

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permissions in place before the specified dates, and as such sufficient time should be allowed.

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Advertising

The advertising function is managed centrally by the Marketing and Media team and all requests for promotional advertising and statutory advertising, notices and vacancies should be made to them. This includes printed, social, digital and broadcast. This is to ensure all money spent on advertising is effective value for money to contain corporate spend, and so that it is recorded for audit purposes.

It ensures that there is consistency in the style and content of advertisements, that they are in line with corporate guidelines regarding branding and Welsh Language Standards, and allows the Council to more effectively manage its use of advertising.

Each request to advertise is considered by the Marketing and Media team based on criteria including circulation data, value for money, whether or not it is appropriate to advertise, what means of advertising is the most appropriate, timelines, whether evaluation and monitoring is in place, whether evidence of effectiveness is available, or whether promotion could be achieved via another method such as press, web or social media.

According to the Code of Recommended Practice on Local Authority Publicity in Wales, any decision to take advertising space in a publication produced by a voluntary, industrial or commercial organisation should only be made on the grounds it provides an effective and efficient means of securing the desired publicity.

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