PRE-ELECTION REPORTS

PREPARING A PRE-ELECTION REPORT UNDER SECTION 99A OF THE LOCAL GOVERNMENT ACT
AUGUST 2012
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FOREWORD

This guide represents the last of SOLGM’s good practice resources designed to help local authorities implement the “TAFM” reforms championed by the former Minister of Local Government.

The guide focuses on one of the two substantially new requirements, the pre-election report (the other – financial strategies – was discussed at length in More Dollars and Sense: Financials and the LTP).

The central message of this guide is that, done well, a pre-election report can be a useful contributor to election debate and to the local accountability process. It is a document that is meant to draw the public’s attention to the key spending issues over the coming years, and to the incumbent council’s financial stewardship.

The other message in this guide is that your pre-election report need not and should not be approached as a “stand-alone” document. A wise council will keep the pre-election report in mind as it designs its long-term plan, as the pre-election report can be used to supplement the story that a long-term plan tells the community.

SOLGM would like to thank the following for their work on the guide:

- Diane Brandish, Christchurch City Council
- Katina Conomos, Thames-Coromandel District Council
- Michael Hodder, Rangitikei District Council
- Mike Neild, Taranaki Regional Council
- Janice Nadew of SOLGM, and Ian Carson of ID Media, for their pre-publication work.

Disclaimer

This Guide has been compiled to assist local authorities in setting charges under the authorities of the Local Government Act 2002 and other legislation.

This Guide is not intended to be a substitute for the legislation, or for the policy judgements of elected members backed by appropriate policy, legal and other advice from their officials.

Every effort has been made to ensure that the document is as accurate as possible. However, the Courts are the final arbiter of what the law actually means.

For this reason, neither SOLGM nor any of the other individuals and groups involved in the preparation of this Guide accepts any liability for any loss or damage arising to any organisation from the use of the material contained herein.

Reading or using the material beyond this point constitutes acceptance of the contents of this disclaimer.
1 WHAT IS A PRE-ELECTION REPORT?

1.1 What Is A Pre-Election Report?

“Pre-election reports will enable voters to consider how well the council has performed to date, promote discussion about the issues facing the council in the future, and make it easier for people to vote for candidates whose priorities align with their own.”

Hon Rodney Hide

“The purpose of a pre-election report is to provide information to promote public discussion about the issues facing the local authority.”

Section 99A(4), Local Government Act 2002

A pre-election report (or PER) is the newest and possibly one of the more contentious elements of the accountability framework. The PER was added to the framework as one of the 2010 package of amendments to the Local Government Act.

At the highest level, the purpose of a pre-election report is to stimulate informed debate about local authority funding and expenditure issues during local election campaigns. It is, broadly speaking, the local government equivalent of the Pre-Election Economic and Fiscal Update (PREFU) that central government prepares.

The main difference between the two documents is that the PREFU contains much more information about the economic situation, and less direct requirement to discuss major projects (though the PREFU often will discuss individual projects or expenditure items in explaining the forecasts).

To this end, the PER is designed to act as the reporting mirror for the financial strategy in that it discloses whether the council has met the targets and stayed within the limits contained within that strategy. The limits were never designed to be legally enforceable (in the sense that the limits would be something that councils could never breach), but the reporting requirement provides elected members with a powerful political incentive to stay within the limits (who wants to say they breached a limit nine weeks out from an election)?

The PER also puts ongoing expenditure issues “front and centre” by requiring that councils disclose prospective financial information and details of the major projects scheduled in the next triennium.

But the PER also has another purpose, albeit one that does not appear anywhere in the Local Government Act. It is another opportunity to tell the community how the council is performing and what it expects to do in the coming three years. As we’ll see later, a PER that takes a minimalist, compliance-only view may not be a useful document, and may even raise more questions than it answers.

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1 Hon Rodney Hide (2010), Decisions for Better Transparency, Accountability and Financial Management of (sic) Local Government
1.2 The Legal Requirements

The legal requirements for a PER are few, simple, and, for the most part, replicate information that is disclosed in other documents such as the long-term plan and annual report:

- the PER is an obligation placed specifically on the chief executive (as compared with other documents such as the long-term plan and annual report where the obligation is placed on “the local authority”)
- the PER must not have any statements by, or photographs of any elected member – this is to ensure that the document is seen to be as apolitical as possible. So for example, the PER can not have a Mayor/Chairperson’s foreword (as is usually the case with other accountability documents) or a photo of elected members either individually or as a collective
- the PER must be completed and published no less than two weeks before nomination day (so the first PER must be completed and published by 9 August 2013)
- the PER must contain the following information
  - the council level funding impact statement (FIS) taken from the annual reports for each of the three financial years preceding the election and the funding impact statements for each of the three financial years following the election as they appear in the LTP. A local authority with an ordinarily resident population of less than 20,000 may substitute the forecast FIS from the annual plan for the financial year preceding the election, in place of the annual report FIS for the financial year ending in the same year as the election
  - a summary balance sheet based on information in the annual reports for each of the three financial years preceding the election and from the LTP for each of the three financial years following the election. A local authority with an ordinarily resident population of less than 20,000 may substitute a forecast summary balance sheet from the annual plan for the year preceding the election, in place of the summary balance sheet based on the annual report for the financial year ending in the same year as the election. The balance sheet must be presented so as to clearly distinguish public debt and financial assets separately (note that the term financial assets is defined in GAAP)
  - local authorities may use unaudited estimates in place of actuals for the financial year preceding the election (though those local authorities with usually resident populations of less than 20,000 may find it easier to use the information in that year's annual plan)
  - a statement that reports on compliance with the financial strategy in each of the three financial years preceding the election. The report must compare actual performance against your local authority's self-set limits on rates, rates increases and debt, and actual returns on investments with the targets specified in the strategy
  - the major projects planned for the three years following the date of the election.

Figure 1 presents an example of the information in a PER prepared in the normal course of events must contain. The information requirements for the first PER are somewhat different and are shown in Box 1 and Figure 2.

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2 Election day in 2013 is Saturday 12 October. At the time of writing the Minister of Local Government was considering a proposal that nomination day be brought forward a week in which case the due date for the PER would become 2 August 2013. We advise local authorities to plan their projects based on the earlier date, until advised of the outcome of Local Electoral Act review.

3 Strangely, a PER need not include any financial information for the financial year in which the election is held.
Figure 1: Mandatory Contents of a “Normal” Pre-Election Report

Retrospective Information
- funding impact statements for election year -3 and election year -2 (from the annual reports) and either an estimated FIS for election year -1 or the FIS from the annual report for that year
- summary balance sheets for election year -3 and election year -2 (from the annual reports) and either an estimate FIS for election year -1 or data from the annual report for that year
- a report on compliance with the limits in the financial strategy
- a report comparing the actual and target returns on investments

Prospective Information
- funding impact statements for election year +1, election year +2, and election year +3 (from the LTP)
- summary balance sheets for election year +1, election year +2, and election year +3 (from the LTP)
- major projects for the election year +1, election year +2, and election year +3 (no source legislatively specified but in most instances will be the LTP)

(-3) (-2) (-1) (Election Year) (+1) (+2) (+3)

Figure 2: Mandatory Contents of a “Transitional” Pre-Election Report

Retrospective Information
- Cash flow statements for the 2010/11 and 2011/12 financial years and either an estimated cash flow statement for the 2012/13 financial year or the statement from the annual report for that year
- summary balance sheets for the 2010/11 and 2011/12 financial years and either an estimated balance sheet for the 2012/13 financial year or the actual balance sheet from the 2012/13 annual report.

Prospective Information
- funding impact statements for the 2014/5, 2015/6 and 2016/7 financial years (from the LTP)
- summary balance sheets for the 2014/5, 2015/6 and 2016/7 financial years (from the LTP)
- major projects for the 2014/5, 2015/6 and 2016/7 financial years (no source legislatively specified but in most instances will be the LTP)

2010/11 2011/12 2012/13 (Election Year) 2014/15 2015/16 2016/17
Box 1: The Transitional PER

As the first PER required under the Act, the PER prepared in advance of the 2013 local elections has slightly different information disclosures in that the PER need not include:

(i) retrospective annual report FIS for the years 2010/11 and 2011/12 – however it must include either an annual report FIS for 2012/13 or the annual plan FIS for 2012/13 (for those local authorities that have usually resident populations of less than 20,000). The reason for the reduced disclosure requirements is that the first documents that include a mandatory FIS are the 2012/22 LTPs and therefore 2012/13 will be the first year for which any FIS exists in most local authorities.

(ii) a report on compliance with the financial strategy – as most local authorities will not adopt a financial strategy until the 2012/22 LTPs.

However all transitional PER must include retrospective summary balance sheets. Additionally all PER must include a statement of cash flows as they appear in 2010/11, 2011/12, and 2012/13 annual reports (though local authorities may use estimated information for 2012/13).

There is no prohibition on including other information in the PER. It is over to each individual local authority to decide. However the PER document is produced at a sensitive time for a specific purpose, so any additional material should add to or amplify the story that the mandatory content tells.

There is no direct audit requirement on the PER itself (and given the short window of time between the end of the financial year and the statutory deadline an audit would have been logistically challenging). However much of the financial information in a PER will be drawn from sources that are audited – the long-term plan and annual report. Some members of the public will compare the financial information that is not subject to audit (i.e. the previous year’s estimated FIS and summary balance sheet) with the actual data when the annual report is published (either just before or just after election day).

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2 PREPARING A PER: CONTENT

2.1 The PER and the “Performance Story”

During the policy process that led to the creation of the PER, the then Minister and his officials stated the view that:
“Chief executives will be cautious about being seen to make political comments in the lead-up to an election. It is likely that they will present those reports in a minimalist fashion.”5

Although there is merit in this argument, SOLGM considers that it is a simplistic view to take. There are risks in comments that could be seen as overtly political, but likewise there are also risks in putting financial and non-financial information into the public domain without proper context or explanation. For example, if the council’s debt is forecast to increase, putting numbers out without explanation invites the public and candidates to “create” an explanation. Carefully crafted, politically neutral explanations should not breach either the letter or the intent of the Act.

Places where additional information may well be useful to a reader include:
• the statement of compliance with the limits in the financial strategy – if limits are breached the PER should explain why and whether this is expected to be a “one-off” or something that will continue
• disclosures covering the performance of financial investments and equity securities – if investments are not performing as anticipated some explanation of why, and what action the council proposes to take (if any)
• long-term financial trends – merely showing numbers and reporting on compliance with the limits in the strategy may not in itself be sufficient for the reader. It may be relevant to discuss issues such as how the financials mesh with the overall direction in the financial strategy. For example, a council that began the LTP with an unsustainably low level of rates and high debt might add context to the numbers by explaining that the council is actively attempting to lower its debt, the implication of which is that today’s ratepayers will pay more for local government services
• the major projects – the Act does not specify which information about major projects should go into a PER. It appears that just stating a project name such as “the new Waikikamukau Library” or “the Upper Creek Water Supply Upgrade” would comply with the legislation. However a list of projects, by itself, is probably not a useful basis for debate, even for those readers that refer back to the LTP. You may wish to provide further information such as the cost of the project (either from the LTP or an updated figure if you have one6), and a rationale for the project7.

6 Be wary of this – especially if the cost has increased significantly since adoption of the LTP. You may be leaving yourself vulnerable to claims of “budget blowouts”.
7 Other SOLGM guidance (especially Performance Management Frameworks: Still Your Side of the Deal and Telling Our Stories 2012) strongly suggest that this type of information clearly and concisely explain “what’s in it for the public” or an explanation of how the project will contribute to community wellbeing.
2.2 Selecting Major Projects

Your PER has to identify the major projects for the three years after election year. Selecting major projects for disclosure is an important part of preparing a PER.

The good news is that your local authority will have already done much of the selection as part of the long-term plan process, and that in all likelihood all you will need to do when starting the PER is to review the existing selection for current relevance.

You should be able to find many, if not all, of your major projects in either your long-term plan summary or near the front of your long-term plan (along with the other key issues for consultation).

In addition to those it is generally a good idea to put other projects “through the sieve” once again to ensure that nothing is left out of the PER that should be included. In particular look for any or all of:

- major changes in levels of service
- major levels of cost (or major changes in cost) – this would, for example, catch situations such as network extensions to service growth, where the level of service might not change but the level of cost in providing that level of service certainly would. That might mean a big piece of renewal work qualifies for inclusion in the PER
- some major piece of work that has been added by LTP amendment.

Given the low level of mandatory disclosure that sits against “major projects” and the politically sensitive nature of the PER, it is generally prudent to err on the side of caution in selecting the major projects. In other words – if in doubt whether a particular project is “major”, there will generally be less risk in disclosing the project in the PER, than in leaving it out.

2.3 Neutrality of Content

The document will be released in the pre-election period, take special care that the document is written in a politically neutral and factual way. The principles in the Audit-General’s report Good Practice for Managing Public Communications by Local Authorities are especially relevant to a PER (just as these principles are relevant to the design of an election-year annual report).

The timing of the PER is such that it could potentially be seen as the current elected members “manifesto”. This is one time when a council document should definitely mention that the preparation and timing of the report is a mandatory requirement (chief executives may also want to consider whether a direct reference to their obligations is necessary). Explanations could be given (perhaps under “Basis of Preparation”) that the prospective financial data and discussion of major projects are drawn from the information in the current LTP and that they reflect the policy and service delivery decisions of the current council at that time (or at the time of any LTP amendments).

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8 Office of the Auditor-General (2004), Good Practice for Managing Public Communications by Local Authorities available for download here
9 SOLGM generally considers that referring to legislative requirements as the sole (or even major) rationale for preparing accountability documents sends the community a signal that the council is doing this “because it has to” rather than as a means of seeking community views, or demonstrating how ratepayer funds have been used.
2.4 What about Election Year?

The PER need not contain any information for the election year (so for example, the 2013 transitional PER will not have to include information for the 2013/14 financial year). We understand that the omission of election year was deliberate and based on a view that the public would have only just seen details of prospective financial and non-financial performance through the annual plan process.

We suggest that local authorities should generally include at least the financial content for election year. It aids presentation of trends in financial performance, and also avoids the potential for ratepayer confusion (having to answer the inevitable queries about the omission of election year). We do not see significant additional cost in including information for election year – the information can be taken either from the LTP or the annual plan (the latter is a better option in that the financials will reflect the best available information).

2.5 Basis of Preparation

The PER will not contain a report from the auditor. Sharp-eyed members of the public will notice that and may ask how they can be sure that the information can be relied upon.

Your PER should contain a short explanation to the effect that much of the information in the PER as already been audited. In particular:

- the first two years’ retrospective financial data have been audited as they have been taken directly from the annual report
- the three years’ prospective financial data from the LTP has likewise been audited (and the list of major projects will also have formed a part of that audit as a key piece of underpinning information).

Information that will not have been audited includes:

- the report on compliance with the limits, and achievement of target returns on investment contained in the financial strategy (though much of the financial information that forms the basis for the comparisons will have been audited)
- the financial information for the most recent financial year (unless you are able to prepare a set of financials and get them audited in three weeks)
- any prospective financial information that is over and above the LTP information, and that you choose to disclose.

In preparing the estimated information for election year -1, local authorities are required to take their “best guess”. Our advice is that this best guess should start with the last set of financial information provided to elected members (be it monthly or quarterly) supplemented with your financial people’s best information as an update. In the case of balance sheet information we suggest that existing asset values updated with an appropriate inflator (such as the Construction Cost Index) will suffice.

We suggest that the PER should contain a brief, and non-technical, explanation of the method your local authority has used to generate/estimate the most recent year’s FIS and summary balance sheet. That explanation should also clearly state that this estimate was prepared using the best information available to you at the time the statements were prepared and highlight some areas where material differences may occur between the financial information in the PER and that in the upcoming annual report (for example asset revaluations may impact significantly on asset values).
The risks inherent in presenting unaudited (and estimated) financial information to the public nine weeks before an election are such that we advise local authorities that have the option of using annual plan data (as provided in clause 37, schedule 10) to do so.

“Reforecasting” Prospective Information

The legislation was written on the assumption that prospective financial and non-financial information would come from the relevant years of the LTP, more or less as it appeared in the LTP. Any amendment to the LTP would be reflected in a new set of financials that would be disclosed with the amendment. And don’t forget – a PER will be prepared 13-14 months after adoption of an LTP and just after adoption of the annual plan for the second year of the LTP (in which case that process may provide the time and space for any reforecasting).

However local authorities can (and do) carry over projects from one year to another for a variety of reasons10 – lack of available resources, inclement weather and the like. Some changes in circumstances do not necessarily generate amendments to an LTP (such as changes to the cost of an activity).

In these cases the actual set of affairs could be significantly or materially different from that in the LTP. It may then be desirable for your local authority to present updated financial forecasts, rather than a legal necessity.

If you choose to reforecast, your PER will need to include both the updated information and the information from the long-term plan – you cannot substitute one for the other. Each should be clearly distinguished from the other – so the LTP information might be labeled “LTP” and the updated information labeled “forecast” or similar.

If your local authority chooses to produce additional prospective information then it’s important to:
- explain why a new set of forecasts is necessary – what factors have changed (what change in assumptions, or movement of a project etc) and
- give a broad indication of the impact of the change.

10 A recent Auditor-General’s report noted that in the 2009/10 financial year about 78 percent of the capital programme.
3 PREPARING A PER: PROCESS

3.1 Links between the PER and the Long-Term Plan

The PER is the reporting mirror for some of the key elements of a long-term plan (especially those in the financial strategy). The ideal place for your local authority to start the production of the next PER is in the preparation of the LTP. In particular, keep thinking about the PER as you approach the following aspects of the LTP:

- **the financial strategy** – remember that ultimately your local authority has to report on compliance with the limits on rates and debt at a “sensitive” time in the political cycle. Ensure that the LTP is designed with some scope for contingencies so that the number of breaches of the limits is minimised. Ideally breaching the limits would be the result of circumstances such as an unexpected opportunity or other unexpected event – rather than more mundane issues such as small cost changes or carryovers between years

- **financial forecasts** – in previous years there has been an observable trend for LTPs to get amended at the end of their first year of operation. The end result often being that the proposed rates increase for year two is lowered as projects are deferred into later years and the like. With the PER focusing on years three–five of the LTP deferral into those years may not be as available an option. It’s a truism, but the place for careful thinking about sequencing of expenditure is as the LTP is initially developed

- **the capital programme** – many LTPs show a capital programme that reaches a peak in either year three or year four of the LTP. Don’t forget that that years three and four of the LTP are also two of the years that must be shown in the PER. A capital programme that peaks in years three and four of the LTP will show up in the prospective FIS for the year after election year, and in the list of major projects. Be sure that there is a genuine case for putting such expenditure in years three and four of the LTP, and its not just to keep the rate rises for years one and two to “acceptable” levels. This is also a powerful driver for realism in the capital programme for the first couple of years, unachieved capital work that carries over could also provide an avoidable headache when preparing the PER

- **the LTP summary and the “front end” of the LTP** - these each focus on the major issues and options for which your local authority is seeking community input. Many, though not all of the matters you place in your summary revolve around proposals for major projects – your community will expect that these appear in your PER (assuming they fit within the timeframe that the PER covers).

3.2 A PER Development Timetable

Your PER can be started well in advance of the end of the financial year before election year. Those local authorities that have (and take up) the option of using annual plan data for the year preceding election year could theoretically start as early as adoption of the annual report for election year -2.

Much of the information in the PER should be easy to collate. The prospective financial and project information already exists in the LTP, the retrospective FIS and summary balance sheets for election year -3 and election year -2 already exist in the annual reports for that year. With this information you should also be able to make a start on writing your report on compliance with your financial strategy.

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11 These two years appear in Figure One as “election year +1” and “election year +2”.
The two main logistical challenges that preparing a PER will raise are:
- preparing an estimated FIS, and an estimated summary balance sheet for the year preceding election year in the time between the end of that financial year and late July – this is one challenge that every local authority with a usually resident population of 20,000 or more will face
- making a decision as to whether “reforecasting” the prospective information is necessary and managing that process – though no local authority is under any obligation to reforecast.

3.3 Presentation

Your local authority could comply by simply placing all the required information in a wordfile, and turning the resulting document into a PDF with little or no further thought about the design aspects. Taking such an approach would not encourage the public to read and consider the issues in your PER – and would not sit well with the purpose of the PER.

This is not to say that local authorities should produce PER that look like a cross between the type of annual report that a company listed on the NZX would produce and a travel brochure.

As a rule of thumb SOLGM suggests that if your local authority wants to produce an effective PER it would devote about as much effort to the presentation of the PER as it would to presenting an annual report summary. However, the tight timeframe between the availability of the last information and the statutory deadline for publication and availability precludes a full-scale publication effort (and in practice political sensitivities would probably preclude preparing something that could be seen as a “glossy”).

But some attention should be given to presentation. This does not necessarily mean masses of colour and photos.

The PER should be clearly laid out and that some attention should be given to:
- short simple sentences – ideally no more than 10-12 words per sentence, and no more than one idea per sentence. This document is intended for a lay audience as opposed to the professional and specialist audience
- avoiding the financial, policy and engineering jargon
- using attractive, easily readable and generous fonts (10 point font size is really the minimum)
- using blank space
- supplementary techniques for presenting the financial information – requirements to show FIS and summary balance sheets means a tabular format will be required, but there is no reason why this could not be supplemented with line graphs etc.

3.4 Resources

Many of the same resources for production of summary statements of proposals (LTP summaries etc) will be required for production of the PER. While the PER will draw on resources from across your local authority, the bulk of the actual drafting should be left to a single person (as opposed to drafting by committee).
There is not necessarily a “right place” in the organisation where this responsibility should sit, but whoever the final person is, that person should ideally:

- be skilled in plain English writing
- have a reasonable understanding of the range of content in the LTP without being overly focused on the detail
- have a reasonable knowledge of the local community.

The best skill set for content you have to lead the process will be a person from your “communication” area. Those local authorities that have a communication person or team should view drafting the PER as core business for that person/team. If your council does not have a communication person or team then your executive needs to decide if you are going to bring in an external resource or free up an appropriately skilled internal resource.

The wider organisation should get to input into the PER after the first draft i.e. as peer review. The purpose of a peer review should not be to redraft or make editorials. Rather the purpose of a peer review is to identify any unaddressed issues, or any issues of consistency or clarity.

After making amendments from the peer review of the first draft, bring a sample group of people from outside the process together to view the final draft. This will provide a clear indication of how the plan will be perceived by the public and any major queries/issues they may have as a result. Address these issues, make amendments and review final draft.

3.5 Approval Process

The PER is meant to be an apolitical document. The council does not have to formally adopt it before it can be published, as a matter of law only the chief executive’s approval is necessary.

However, things are never this simple. The chief executive is a direct employee of the council, and as such is accountable to the council for the performance of their duties including the preparation of a PER. Also most chief executives have “no surprises” clauses (or variations on this theme) in their employment contracts.

We suggest that chief executives should give elected members a reminder of:

- the purpose of the PER and
- the requirements (which includes such potentially contentious disclosures as whether the council complied with its own financial strategy).

That reminder should come well in advance of the preparation of the report. The reminder should also include a proposed process for preparation of the PER (and note that, by law, the final decision to adopt the PER is strictly the chief executive’s).

One appropriate time to do this might be in the time between preparing the annual plan and the hearings/final deliberations on the annual plan.

We also suggest that elected members should be given a draft of the PER “for their information”. But that draft should be qualified with a similar explanation about the purpose and requirements of the PER.
Distribution/Publication

The LGA requires that the PER be prepared and “published” – a slightly different wording from that which applies to other accountability documents (these must be “made publicly available”). On the face of it the wording of the requirement suggests that your local authority need only place the document on a publicly accessible page on your website without further comment (what is known in central government as a “soft release” of information).

However, this is not consistent with either the purpose of the pre-election report, or the general principles of local accountability embedded in the Local Government Act. Consideration should be given to:

- publishing an electronic (and readily downloadable and printable) copy of the PER on your local authority’s website
- preparing a small number of hard copies for placement in libraries, council service centres and the like
- publicity that the PER is available through the council’s regular networks for communicating with the community. As a document that has potentially “controversial” content, that publicity might limit itself to advising availability and 2-3 really key messages (but presented without embellishment)
- a communication to the media explaining what the PER is and does, and what it is not intended to do. Again, 2-3 really key messages, presented without embellishment, will help get the organisation’s side of the story out.

12 Publicly available is defined in the LGA as ensuring that the document (or a copy) is accessible to the general public and that your local authority has publicised the fact that the document is available and explained how copies can be obtained.