

Pre-election period of sensitivity - guidance

A guide to maintaining impartiality during the pre-election period of sensitivity

March 2021

About this resource

It is critical that all members of the Healthwatch network continue to act in a politically neutral manner.

You will already be aware of the requirements around this, as set out in the [NHS Bodies and Local Authorities \(Partnerships Arrangements, Care Trusts, Public Health and Local Healthwatch\) Regulations 2012](#). The Local Government Association produces [guidance for councils](#) which is useful **because it shows the implications for local authorities and will inform your commissioner's views.**

This resource aims to give you the guidance you need for the duration of the local or national elections. It includes some important points for you, your board and operational team to consider with regards to the period of pre-election sensitivity and information on how Healthwatch England will be operating during this period.

What is the 'pre-election period of sensitivity'?

'This is the period of time before an election when public authorities are limited in what they can do. This is to ensure that they are not seen to favour one political group or interest.

What this means for you

- All members of the Healthwatch network continue to act in a politically neutral manner.
- You will need to carefully consider and make a judgement about the work you have planned for this period. In particular, consider how activity may be perceived in light of campaigning taking place. You should continue to operate as usual and carry out day-to-day activities, such as publishing Enter and View reports and holding public engagement events while being aware of the heightened sensitivity.
- You must not engage in, or advocate for, any party-political activities during this period.
- You should discuss with your board and operational team how you plan to conduct your communications and external engagement during this time. We would also urge your operational team to have a discussion with your local authority commissioner to establish if there will be any specific guidance during this period that the local authority will expect local Healthwatch to comply with.
- There is a shared responsibility across the network to ensure all local Healthwatch act to uphold the reputation of the Healthwatch brand. Therefore, operating in the spirit of the official guidance will help you to avoid compromising your impartiality or reputation.

Implications for staff and board members

- Staff and / or board members may be involved in elections as supporters of political groups or as candidates. In these cases, it is important that they ensure that this is done in their own time and that they do not use any Healthwatch resources to support this activity.
- Healthwatch will also need to ensure that they are not used in a way that might be seen as supporting any campaigning activity.
- If any board members or staff are involved in canvassing, careful consideration should be given about their role in any public-facing activity during this period. You should consider

whether a different person can take part in the activity or whether it can be postponed until after the election.

It will be important to remind your board members and staff about your code of conduct and / or your conflict of interest policy so that they are clear about their responsibilities.

Consultation and engagement

“Promoting, and supporting, the involvement of people in the commissioning, provision and scrutiny of local care services” is a statutory function of Healthwatch and can be continued during this period.

You will need to consider the implications of how this is carried out and may need to adapt your approach to assure that you maintain your impartiality.

Whatever work you are undertaking, it is expected that it should not draw attention away from the election, so you should be careful about how you publicise any engagement activity, even if the subject is not contentious.

During the pre-election period you should also **think carefully** before you:

“Launch any new consultations. Unless it is a statutory duty or considered normal council business, such as budget consultations. Councils should consider carefully before starting any new consultations or publish report findings from consultation exercises, which could be politically sensitive.”

[Local Government Association’s guidance to local authorities](#)

Publications

During this period, you may still be undertaking Enter and View visits and you may want to continue to publish reports on those activities. Material that would normally be considered objective and impartial may well be seen as political and attract criticism in these highly sensitive periods, so you should consider each report separately before publication.

Social media

As ever, in your capacity as a Healthwatch representative, be careful not to issue any personal opinions on social media platforms, for example Twitter and Facebook, or make any comments from your Healthwatch account that could lead you into a political debate.

Avoid offering additional comment or opinion. Candidates and supporters may ask directly about **Healthwatch’s work**, and any comment you make should be purely factual rather than expressing an opinion.

Do not retweet tweets from a political or campaigning organisation that is advocating party political positions, or from a local figure who is standing for election.

Consider removing any applications that share content automatically to your social media channels during the election period.

Media enquiries

It is possible for comments made to the media to be taken out of context or misinterpreted and used in a way that could call into question your political impartiality or that of your local Healthwatch.

If a journalist contacts you during this period

If you are contacted during the pre-election period of sensitivity, you should direct journalists to material already in the public domain – such as previous statements or reports that you have released on issues.

Avoid offering additional comment or opinion, and if a journalist asks questions directly about Healthwatch, any comment you make should reflect previously published materials. This will be important if the journalist is fact-checking something said by a candidate, as you may be perceived as being critical of that candidate.

Journalists will often be working on a short timescale and will want a quick response. Don't be rushed into saying something before you have had time to think about your response. It can be better not to respond at all than being pushed into saying something that does not accurately reflect your views.

Working in partnership

Public sector organisations will be aware of the limitations imposed by the period of pre-election sensitivity, but partners from other sectors may not.

Check that any partnership activity that you are associated with takes account of the heightened sensitivity. For example, if a campaigning organisation wants to launch a report that you have collaborated on, you will need to be assured that it will not be seen as supporting a particular political group or candidate either directly or indirectly.

Healthwatch England activity during this period

Healthwatch England will be subject to the guidance issued by the Cabinet Office which will apply to all Government departments and arm's length bodies. During this time, we will continue with our day-to-day business of supporting the Healthwatch network and taking forward our projects. However, in line with Cabinet Office guidance, we will be reducing our public-facing activities and carefully considering how the work we carry out may be perceived.

Need more information?

If you have any questions about this guidance or any specific issues, talk to the Policy Team.
policy@healthwatch.co.uk