

1 Do campaigners need to put imprints on materials on closed Whatsapp groups?

What matters in this context is whether you are making your material available to the public or a section of the public.

Typically most groups on Whatsapp are private.

A social media group that is open for anyone to join will be available to the public. However, a group where membership is limited is not necessarily private – for example, a Facebook buying and selling group for people who live in a certain area is still a section of the public.

If a group is made up entirely of people who have signed up to receive your updates, this will not count as public.

2 Does historic content require an imprint or only materials published when the law has come into effect?

The imprints legislation does not apply to historic content published before it came into force. However, if you republish the material now, then that brings it into scope and it could require an imprint.

3 Do councillors need to put an imprint on materials communicating updates to residents from the council?

Assuming this sort of material is organic (ie not a paid advert), then since a councillor is a [relevant entity](#), an imprint will be required if the material is any of:

- election material
- referendum material
- recall petition material

Assuming that the council updates are unlikely to be any of these, an imprint is unlikely to be required.

4 Will councillors have to put imprints on all their digital materials all year round?

The digital imprints regime can apply at any point – there is no regulated period, unlike for example candidate spending.

For a paid advert published at any time, if it is [political material](#) – for example if it is reasonably regarded as intended to influence the public to support the councillor – then it will require an imprint.

For [organic material](#), as a relevant entity a councillor must include an imprint on any material which is either election material, referendum material or recall petition material. This is therefore much more likely in a period where these electoral events are happening.