



Standards Committee

Date: FRIDAY, 15 MAY 2015

Time: 11.30 am

Venue: COMMITTEE ROOM, 2ND FLOOR, WEST WING, GUILDHALL

Members: Judith Barnes (Co-opted Member)
Nigel Challis
Mark Greenburgh (Co-opted Member)
Michael Hudson
Deputy Alastair King
Dan Large (Co-opted Member)
Oliver Lodge
Edward Lord
Felicity Lusk (Co-opted Member)
Virginia Rounding
Alderman Baroness Scotland
Tom Sleigh

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Lunch will be served in the Guildhall Club at 1pm

N.B.: Part of this meeting could be the subject of audio/visual recording.

John Barradell
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES OF THE PREVIOUS MEETING**

To agree the public minutes of the meeting held on 20th February 2015.

For Decision
(Pages 1 - 10)

4. **ORDER OF THE COURT**

For Information
(Pages 11 - 12)

5. **ELECTION OF CHAIRMAN**

To elect a Chairman in accordance with Standing Order No. 29.

For Decision

6. **ELECTION OF DEPUTY CHAIRMAN**

To elect a Deputy Chairman in accordance with Standing Order No. 30.

For Decision

7. **UPDATE- ANNUAL UPDATE TO THE MEMBERS' DECLARATIONS**

At its meeting on 20th February 2015, the Standards Committee approved a number of actions in respect of the Members' Declarations with a view to ensuring that all Members had appropriately responded to the 2014 annual update process.

This report of the Town Clerk sets out how those actions have been progressed since the Committee's last meeting and also proposes new arrangements in respect of the future management of the Members' Declarations.

For Decision
(Pages 13 - 20)

8. **MEMBERS' DECLARATIONS - CO-OPTED MEMBERS**

A joint report of the Town Clerk and the Comptroller & City Solicitor relative to a proposal in respect of the adoption and implementation of a consistent approach to the management and publication of Declarations of Interest by the City Corporation's elected and Co-opted Members.

For Decision
(Pages 21 - 26)

9. **COMPLAINTS REVIEW PROCESS**

At the request of the Standards, this joint report of the Town Clerk and the Comptroller & City Solicitor sets out the City Corporation's current complaints procedure and the governance arrangements in respect of the Sub Committees that are constituted to consider any alleged breaches of the Code of Conduct. The report invites Members of the Standards Committee to consider and comment on the current complaints process.

For Information
(Pages 27 - 46)

10. **DRAFT ANNUAL REPORT OF THE STANDARDS COMMITTEE**

A report of the Town Clerk relative to the Standards Committee's draft Annual Report which, in accordance with the Committee's terms of reference, will be submitted to the Court of Common Council on 25th June 2015.

For Decision
(Pages 47 - 50)

11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

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STANDARDS COMMITTEE Friday, 20 February 2015

Minutes of the meeting of the Standards Committee held at Committee Room, 2nd Floor, West Wing, Guildhall on Friday, 20 February 2015 at 1.45 pm

Present

Members:

Edward Lord (Chairman)
Oliver Lodge (Deputy Chairman)
Judith Barnes (Co-opted Member)
Nigel Challis
Mark Greenburgh (Co-opted Member)
Deputy Alastair King
Dan Large (Co-opted Member)
Felicity Lusk (Co-opted Member)
Alderman Julian Malins

Officers:

Lorraine Brook	Town Clerk's Department
Edward Wood	Comptroller & City Solicitor's Department
William Chapman	Private Secretary and Chief of Staff to the Lord Mayor
Jonathan Pallant	Mansion House

Also present: Neil Asten (Independent Person), Deputy John Bennett (Chief Commoner), Anju Sanahi (Independent Person), Chris Taylor (Independent Person) and Alderman Sir David Wootton were also present at the meeting.

1. **APOLOGIES**

Apologies for absence were received from Michael Hudson and Virginia Rounding.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were none.

3. **MINUTES OF THE PREVIOUS MEETING**

The minutes of the previous meeting held on 28th November 2014 were approved as accurate record subject to a correction to paragraph 1, page 3 which should clarify the abbreviation "MIPIM."

Resolved:- That the minutes of the meeting held on 28th November 2014 be approved as an accurate record subject to a correction to paragraph 1, page 3 which should clarify the abbreviation "MIPIM" and read as: "MIPIM (Le marché international des professionnels de l'immobilier)..."

4. **MINUTES- DISPENSATIONS SUB (STANDARDS) COMMITTEE**

The minutes of the last meeting of the Dispensations Sub (Standards) Committee held on 23rd September 2014 were received.

Resolved:- That the minutes of the last meeting of the Dispensations Sub (Standards) Committee held on 23rd September 2014 be noted.

5. **GIFTS AND HOSPITALITY- CEREMONIAL OFFICEHOLDERS**

Alderman Sir David Wootton was present at the meeting during this item.

The Committee considered a report of the Private Secretary and Chief of Staff relative to the arrangements for ceremonial officeholders in respect of gifts and hospitality, which had been considered by the General Purposes Committee of Aldermen on 10th February 2015. An extract of the minutes of that meeting were tabled for information.

The Private Secretary and Chief of Staff advised Members that following the discussion at the last meeting of the Standards Committee, the proposal as at paragraphs 4 and 8 of the report had been developed and submitted to the General Purposes Committee of Aldermen for consideration. It was noted that a positive discussion has taken place at that meeting and the Committee was broadly supportive of the introduction of the proposed arrangements. Particular interest had been expressed in identifying a method by which reciprocal gifts were clearly identified on the register.

With regards to the receipt of hospitality it was proposed that the same financial thresholds for hospitality apply to the Lord Mayor as for other Members of the Court unless diplomatic, commercial or political sensitivities were a consideration in which case such instances would be brought to the Chairman of the Standards Committee's attention rather than via the published register. Some Members queried why only the Chairman would be entitled to view such information and it was therefore agreed that any instances where hospitality was not declared in the public domain would be reported to the Committee in the form of a non-public report.

A Co-opted Member commented on the current requirements on the Government's ministers and whilst it was noted that full disclosure about the receipt, retention and value of all gifts might be considered ideal, this did not reflect the unique position of the Lord Mayor of London or the reputational implications if certain sensitivities were not taken into consideration. As the Lord Mayor of the day funded the provision of some gifts this too had to be taken into consideration.

It was agreed that the proposal would introduce greater transparency about the gifts and hospitality received by ceremonial officeholders such as the Lord Mayor and, in light of its implementation over the coming weeks, it was felt that the Committee should review the arrangements and scrutinise the register in twelve months' time. It was noted that the introduction of similar arrangements for other ceremonial officeholders such as the Sheriffs would be progressed henceforth in consultation with the Secondary and Under Sheriff.

Resolved:- That –

- (i) the proposed arrangements for the registration of gifts and hospitality for ceremonial officeholders be agreed;
- (ii) the new arrangements, in respect of the Lord Mayor, be introduced as soon as possible and by no later than April 2015;
- (iii) the new arrangements for the registration of gifts and hospitality by the Lord Mayor be reviewed in twelve months' time; and
- (iv) the arrangements in respect of other ceremonial officeholders be progressed in consultation with the Secondary and Under Sheriff.

6. UPDATE- ANNUAL UPDATE TO THE MEMBERS' DECLARATIONS

The Committee considered a report of the Town Clerk which detailed the outcome of the annual update to the Members' Declarations which took place in December 2014 following the introduction of new requirements under the Members' Code of Conduct in respect of the registration of non-pecuniary interests.

The Town Clerk referred to the separately circulated Appendix 1 which included copies of all of the updated Members' Declarations forms which had been received following circulation of the annual reminder to all Members and Co-opted Members in December 2014. It was noted that as at 11th January 2015, 106 elected Members had responded to the request for updates. Whilst it was clear that a number of Members had been fastidious about bringing their Registers of Interest up to date ahead of the 1st January 2015 implementation date, the Chairman expressed some concern that some updates had not taken place and in some instances the on-line Registers contained typographical errors and incomplete details pertaining to non-pecuniary interests.

In light of the current position, and given the number of reminders that had been issued by the Town Clerk since December, it was felt that the issue of non-compliance with the registration requirements should be escalated and a formal communication issued by the Comptroller and City Solicitor, in his capacity as the Monitoring Officer, to all Members. Given that there were a number of different issues that needed to be highlighted, it was agreed that the following correspondence should be circulated by the Comptroller and City Solicitor as soon as possible:

- (i) non-respondents to be sent a request clarifying that a Declaration must be resubmitted to the Town Clerk even in the event that there were no updates to either the individual's statutory or non-pecuniary interests;
- (ii) where a response was manifestly incomplete, the Member concerned would be asked to fully update their Members' Declaration; and
- (iii) in each instance Members would be requested to check their on-line Members' Declaration for transcription errors.

Members would be requested to respond by no later the end of March 2015 and thereafter the Standards Committee would review the position at which point, if necessary, the issue of more formal action would be explored.

It was further agreed that the importance of the annual update process should be flagged in the next Annual Report of the Standards Committee which would be submitted to the Court of Common Council in June 2015. Accessibility of the Corporate Governance documentation should also be explored to ensure that up-to-date information was accessible by both Members and the public.

A Co-opted Member queried why his completed Register of Interests was only retained on file in the Town Clerk's Department and was not available on-line. The Comptroller and City Solicitor confirmed that the statutory provisions in relation to on-line registration only applied to those Co-opted Members who were entitled to vote on matters relating to the City Corporation's local authority or police authority functions; but that this did not preclude the Register of Interests of all Co-opted Members being made available on-line as a matter of policy. There was some discussion about the need for the non-voting Co-opted Members of the Standards Committee to set an example; it was also observed that a number of City Corporation Committees with responsibility for non-local authority functions had voting Co-opted Members, who equally would not be caught by the statutory provisions. It was therefore agreed that for the sake of consistency the Register of Interests of all Co-opted Members should be published on-line. However, concern was expressed that Co-opted Members should be given plenty of notice about such a change. Members also requested confirmation as to whether this change would need to be confirmed by the Court of Common Council. It was therefore agreed that officers would bring a proposal back to the next meeting of the Standards Committee to ensure that a consistent approach to the publication of Co-opted Members' interests was adopted, ideally to be implemented before the summer.

With regards to the administrative arrangements for updating the on-line Registers of Interest, the Committee queried whether there was scope for Members to be able to update their own Registers on line. The Town Clerk provided a brief overview of the software that was used to publish the data and advised that whilst she did not think that self-service was viable, this would be explored and the Committee updated at the next meeting. Likewise, in respect of the current format of the on-line form which included a single box in which non-pecuniary interests were logged, the Town Clerk undertook to investigate whether the form could include separate boxes in which each category of non-pecuniary interests could be logged.

Resolved:- That –

- (i) the report be noted;
- (ii) the 2016 annual update to the Members' Registers of Interest take place in April 2016, at the start of the new municipal year;
- (iii) clarification regarding the arrangements for Co-opted Members (voting and non-voting) be submitted to the next meeting of the Standards Committee; and
- (iv) the Comptroller and City Solicitor circulate relevant correspondence to Members in respect of the annual update and, particularly non-compliance, to ensure that all updates and on-line checks were completed before the new municipal year;

(v) an update report on the status of the annual update be submitted to the Standards Committee following circulation of the Comptroller and City Solicitor's communication;

(vi) the potential for Members to update their own on-line Registers of Interest be explored by the Town Clerk; and

(vii) the on-line Register of Interest form be reviewed with a view to including separate non-pecuniary categories within the form.

7. **STANDARDS COMMITTEE- TERMS OF REFERENCE AND FREQUENCY OF MEETINGS**

Members considered a report of the Town Clerk relative to the terms of reference of the Standards Committee and its sub committees and the Committee's frequency of meetings, ahead of submission to the Court of Common Council on 23rd April 2015 and the start of the new municipal year.

It was noted that the terms of reference of the Dispensations Sub (Standards) Committee had not been included in the accompanying appendix to the report but were those as set out on page 45 (Item 8).

It was queried why the membership of the various sub committees was not shown in the accompanying appendix. The Town Clerk explained that this information was not normally contained in the terms of reference, but confirmed that in each case the membership was three elected Members of the Standards Committee and one non-voting Co-opted Member. It was noted that the Assessment, Hearing and Appeal Sub Committees were also required to take into account the views of an Independent Person. It was agreed that the complaints procedure should be brought back to the next meeting of the Standards Committee in order to review the arrangements. One of the Independent Persons present queried why they did not have a similar role in relation to the Dispensations Sub Committee and was advised that this was not provided for under the Localism Act 2011. It was agreed that further consideration be given to the provision of training to Members in respect of assessment, hearing and appeals proceedings.

In respect of the existing terms of reference and the format of the White Paper (which would be submitted to the Court of Common Council on 23rd April 2015), it was agreed that the documentation should be consistent when referring to Co-opted Members such that "Co-opted Member" be used rather than "external representatives" or "non-Common Council Members". Reference should also be made where appropriate to "Co-opted Members of the City of London Corporation's Committees and Boards" rather than "Co-opted Members of the City of London Corporation". Under paragraph (f) in Appendix 1 it should be made clear that these functions would be carried out by the appropriate sub-committee of the Standards Committee. It was further agreed that, in respect of the term of office, this should state: "None of the appointed shall serve on the Committee for more than a maximum of eight years in total."

Resolved:- That –

(i) the Terms of Reference of the Standards Committee be amended to ensure consistency when referring to Co-opted Members such that "Co-opted Member"

be used rather than “external representatives” or “non-Common Council Members” and that co-option be linked to a Committee or Board;

(ii) the Terms of Reference of the Standards Committee be further amended to reflect the fact that the functions under paragraph (f) would be carried out by the appropriate sub-committee of the Standards Committee;

(iii) in respect of the term of office this should state: “None of the appointed shall serve on the Committee for more than a maximum of eight years in total.”;

(iv) the scheduled meeting dates for the remainder of 2015 and 2016 be noted;

(v) the complaints procedure be reviewed at the next meeting of the Standards Committee; and

(vi) further consideration be given to the provision of training to Members of the Standards Committee in respect of assessment, hearing and appeals proceedings.

8. **DISPENSATIONS ARRANGEMENTS - REVIEW**

The Committee considered a joint report of the Town Clerk and the Comptroller and City solicitor regarding the current arrangements in respect of the granting of dispensations by the City of London Corporation to Members who wish to speak and/or vote on matters where they have a relevant interest.

A brief note setting out some of the key matters that would be taken into account by the Standards Committee and the Dispensations Sub (Standards) Committee in determining requests for dispensations was tabled by the Comptroller and City Solicitor.

With regards to Appendix 1 of the report before the Committee, and which detailed those dispensations that had been granted since the introduction of the Localism Act, some Members noted that there were no details regarding the circumstances of the majority of dispensations that had been granted. The Comptroller and City Solicitor confirmed that these block dispensations had been granted to Members where they were likely to consider housing and Council Tax matters (and had a relevant interest in land within the City) in order to emulate the exemptions under the previous standards regime. It was noted that more recent individualised applications had led to the current approach to considering requests, whereby a Member had to submit a detailed written request setting out the reasons for the request and how long the dispensation was required for. Members endorsed this approach in all cases and emphasised how important it was for as much detail as possible about previous dispensation requests to be included in relevant reports so that the Standards Committee and/or the Dispensations Sub Committee could continuously review the granting of dispensations and ensure that there was a consistent approach.

Whilst some Members had previously indicated that it might be beneficial to have some form of written guidance around the granting of dispensations, the Committee agreed that a prescriptive approach was not appropriate and that the circumstances of each request should instead be considered. It was however agreed that reference back to historic considerations was helpful and that the list of requests (granted or rejected) should be further developed to include appropriate detail that would enable the Sub Committee (or the Committee) to ensure that dispensations were considered in a consistent

manner. Likewise, where other protocols might be a consideration, these should be brought to the Sub Committee's attention at the appropriate time, for example the Planning Protocol.

There was some discussion about whether a dispensation was even necessary to speak or vote on Council Tax issues, given the previous guidance from the Department for Communities and Local Government. The Comptroller and City Solicitor advised that, even if the Committee were to come to the same view about this, it would not be determinative. As a breach of the rules regarding disclosable pecuniary interests was a criminal matter, it would not be appropriate for the Committee to refuse to consider a request for a dispensation on this basis where a Member wished to make such a request.

As some of the current dispensations would expire ahead of the Ward Elections in March 2017, it was agreed that all Members should be contacted in December 2016 to ensure that relevant dispensations were in place, where appropriate (where Members wished to speak or vote on housing or Council Tax issues) ahead of the budget report being submitted to the Court of Common Council in early 2017.

Resolved:- That –

- (i) the list of requests for dispensations be submitted to Members ahead of consideration of all future dispensation requests and the details of every request logged henceforth to provide details of why a dispensation was required, by whom and for how long; and
- (ii) as some of the current dispensations would expire ahead of the Ward Elections in March 2017, those Members should be contacted in December 2016 to ensure that relevant dispensations were in place, where appropriate (where Members wished to speak or vote on housing or Council Tax issues) ahead of the budget report being submitted to the Court of Common Council in early 2017.

9. REPORT OF ACTION TAKEN

The Committee considered a report of the Town Clerk relative to the details of a decision taken by the Town Clerk, in consultation with the Chairman and Deputy Chairman of the Standards Committee, since the last Committee meeting on 28th November 2014 in accordance with the City Corporation's urgency provisions (Standing Order 41(b)). The decision concerned the final wording of the revised Code of Conduct Guidance.

Resolved:- That the report of action taken be noted.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were none.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

With the Chairman's consent the following item of urgent business was considered:-

(i) Thanks to outgoing Members of the Committee

In light of his departure from the Committee as of 23rd April 2015, the Chairman thanked, on behalf of the Committee, Alderman Julian Malins for his sage advice and contributions to the work of the Standards Committee. Formerly a member of the Committee in his capacity as a Common Councilman and, over the past two years, in his capacity as an Alderman, the Chairman thanked Alderman Malins for sharing his experience, opinions and knowledge; all of which had been invaluable to the Committee. It was noted that Alderman Baroness Scotland was expected to join the Committee in 2015/2016.

12. EXCLUSION OF THE PUBLIC

Resolved:– That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item No.13

Paragraph No.1

13. EMPLOYMENT TRIBUNAL SUMMARY

The Committee considered a report of the Comptroller and City Solicitor which had been submitted to the Establishment Committee on 18th September 2014 and provided an update in respect of Employment Tribunal cases that had been dealt with by the Comptroller and City Solicitor to the end of August 2014.

The Chairman advised those present that this information had previously been requested by the Committee following a discussion at an earlier meeting about the Employee Code of Conduct, of which the Committee maintained an overview; and the Member/Officer Protocol. Some Members had requested clarification about the volume and nature of Employment Tribunals involving City Corporation employees and consequently this report set out the most recent details, although it was acknowledged that a covering report to the paper would have been helpful to Members.

Following a discussion about the content of the report and the justification for the information being submitted as a non-public report, it was agreed that a tailored report would be submitted to the Committee in the future, possibly as part of the Director of HR's annual report to the Committee, setting out the relevant issues associated with the Member/Officer Protocol. It was further agreed that, as far as possible, the issues falling within the remit of the Committee should be reported to Members in an appropriate format in the future.

Resolved:- That –

(i) the report be noted; and

(ii) the annual report of the Director of HR include relevant details concerning the Member/Officer Protocol and an overview of any Employment Tribunals pertaining to those issues within the scope of the Standards Committee.

14. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were none.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

With the Chairman's consent one item of urgent business was considered whilst the public were excluded.

(i) Chief Commoner- reflection on a year in Office

The Chief Commoner thanked the Chairman for his invitation to attend the meeting in advance of his year in Office coming to an end in April. Those present were advised that no significant issues concerning Members of the Court of Common Council had arisen, or required intervention by the Chief Commoner, during the past ten months.

The Chairman thanked the Chief Commoner for his attendance.

NOTED.

The meeting ended at 3.30 pm

Chairman

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<p>YARROW, Mayor</p>	<p>RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 23rd April 2015, doth hereby appoint the following Committee until the first meeting of the Court in April, 2016.</p>
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STANDARDS COMMITTEE

1. **Constitution**

A Non-Ward Committee consisting of,

- one Alderman appointed by the Court of Aldermen
- seven Commoners elected by the Court of Common Council, at least one of whom shall have fewer than five years' service on the Court at the time of their appointment
- four representatives (with no voting rights) who must not be Members of the Court of Common Council or employees of the City of London Corporation

None of the appointed shall serve on the Committee for more than two terms, a maximum of eight years in total.

N.B. Three independent persons are also appointed pursuant to the Localism Act 2011.

2. **Quorum**

The quorum consists of three Members, at least one of whom must be a Co-opted Member.

3. **Membership 2015/16**

ALDERMAN

- 1 The Rt Hon. the Baroness Patricia Scotland of Asthal, Q.C.

COMMONERS

- 3 (3) Nigel Kenneth Challis, *for three years*
- 3 (3) Oliver Arthur Wynlayne Lodge, T.D., B.Sc.
- 2 (2) Michael Hudson
- 2 (2) Alistair John Naisbitt King, Deputy
- 2 (2) Virginia Rounding
- 2 (2) Thomas Charles Christopher Sleigh
- 3 (1) Charles Edward Lord, O.B.E., J.P.

together with four Co-opted non-Common Council Members:-

Judith Barnes (*appointed for a four year term expiring in December 2017*)

Felicity Lusk (*appointed for a four year term expiring in December 2017*)

Mark Greenburgh (*appointed for a four year term expiring in December 2018*)

Dan Large (*appointed for a four year term expiring in December 2018*)

4. **Terms of Reference**

To be responsible for:-

- (a) promoting and maintaining high standards of conduct by Members and Co-opted Members of the City of London Corporation and to assist Members and Co-opted Members to observe the City of London Corporation's Code of Conduct;
- (b) preparing, keeping under review and monitoring the City of London Corporation's Member Code of Conduct and making recommendations to the Court of Common Council in respect of the adoption or revision, as appropriate, of such Code of Conduct;
- (c) keeping under review by way of an annual update by the Director of HR, the City of London Corporation's Employee Code of Conduct;
- (d) keeping under review and monitoring the Protocol on Member/Officer Relations;
- (e) advising and training Members and Co-opted Members on matters relating to the City of London Corporation's Code of Conduct;
- (f) dealing with any allegations of breach of the City of London Corporation's Code of Conduct in respect of Members and Co-opted Members, and in particular:

- (i) to determine whether any allegation should be investigated by or on behalf of the Town Clerk or the Monitoring Officer and their findings reported to the Committee;
- (ii) in relation to any allegation that it has decided to investigate, to determine whether there has been a breach of the Code of Conduct, taking into account the views of an Independent Person appointed under the Localism Act 2011;
- (iii) where there has been a breach of the Code of Conduct, to determine the appropriate sanction, and where this involves removal of a Member or Co-opted Member from any committee or sub-committee, to make an appropriate recommendation to the relevant appointing body;
- (iv) to determine any appeal from a Member or Co-opted Member in relation to a finding that they have breached the Code of Conduct and/or in relation to the sanction imposed; and

BARRADELL.

Committee(s)	Dated:
Standards Committee	15 th May 2015
Subject: Annual Update to Members' Declarations	Public
Report of: The Town Clerk	For Decision

Summary

This report provides Members with a further update, following the submission to the last meeting of the Committee on 20th February 2015, on the annual update to the Members' Declarations which commenced in December 2014 following the introduction of new requirements in the Members' Code of Conduct. The Committee felt that whilst it was clear that a number of Members had been fastidious about bringing their Registers of Interest up to date ahead of the 1st January 2015 implementation date, some updates had not taken place and in certain instances the on-line Registers contained typographical errors and incomplete details pertaining to non-pecuniary interests. Consequently, as a number of reminders had been issued by the Town Clerk since December, it was felt that the issue of non-compliance with the registration requirements should be escalated and a formal communication issued by the Comptroller and City Solicitor, in his capacity as the Monitoring Officer, to relevant Members.

This report provides an update about the status of the Members' Registers of Interest following circulation of correspondence by the Comptroller & City Solicitor (in his capacity as the City Corporation's Monitoring Officer) in March 2015 in respect of non-compliance and incomplete declarations.

This report also updates Members of the Committee in respect of their requests that the following be explored by the Town Clerk:

- (i) the potential for Members to update their own on-line Registers of Interest; and
- (ii) the on-line Register of Interest form be reviewed with a view to including separate non-pecuniary categories within the form.

Recommendations

Members are asked to:-

- (i) note the report; and
- (ii) approve the proposal in respect of the future arrangements for managing Members' Declarations, including the testing and implementation of on-line registration by Members via their intranet page and the introduction of separate categories of non-pecuniary interests within the on-line form..

Main Report

Background

1. At the meeting of the Standards Committee on 20th February 2015, an update report about the Annual Update to Members' Declarations was considered and concern was expressed that a number of Members did not appear to be compliant with the Members' Code of Conduct in respect of their statutory declarations and/or the declaration of non-pecuniary interests. Following that discussion it was agreed that the Comptroller & City Solicitor would write to those Members who did not appear to have fully updated their declarations, where no forms had been received or where confirmation had not been received by the Town Clerk that there were no updates.

Current Position

2. Since the meeting on 20th February 2015, the Comptroller & City Solicitor has written to thirty-five Members about their Members' Declaration (Register of Interest). Two different letters were circulated with the first relative to a response having not been received from a Member in respect of the annual update; and the second concerning, potentially, incomplete declarations.
3. Following circulation of those letters in March, various updates have been received and a number of Members' Declarations – including both the statutory and non-pecuniary categories - have been updated. The current position in respect of responses and updates to the Members' Declarations is set out in Appendix 1 which shows that of the thirty-five Members that were contacted in March 2015, twenty-seven responses were subsequently received and the on-line declarations have since been updated. It is important to note that of the thirty-five Members that were contacted one has since retired from the Court of Common Council. Consequently, eleven Members have not yet responded to the correspondence that was previously circulated by the Comptroller and City Solicitor.
4. Where amendments have been highlighted these have been updated on the committee management system which enables, in the case of elected Members, the changes to be visible to the public straight away via their Members' webpage.
5. With regards to Co-opted Members' declarations, the current position is set out in a separate report to the Committee at Item 8.

Moving Forward

6. At the February meeting the Committee queried whether there was scope for Members to be able to update their own registers of interest on-line. This has been explored by the Town Clerk, as requested, and the position is that the committee management system can be reconfigured to enable the City Corporation's elected Members to update their own registers of interest on-line, via the intranet. Whilst some revisions to the system will be required and

a period of testing would need to be undertaken, possibly involving some Members of the Standards Committee, all elected Members would thereafter be able to update their register of interest via their web page (on the intranet) as and when changes are required. Following an update to the system, an assigned officer group within the Town Clerk's Department would review the amendment and, subject to any queries, publish this to the external facing webpages. Whilst we are aware that a large number of Members do not regularly log on to the City Corporation's IS network (the intranet) and this approach to updating registers of interest might not therefore be widely adopted it could, following a testing period, be profiled amongst Members as an option. Those who prefer to submit amendments to the Town Clerk's Department for entry and publishing could continue to do so.

7. The testing period would be important to ensure that the system works as expected and appropriate auditing functionality is in place to allow the Town Clerk's Department to effectively manage the registers of interest.
8. In respect of the Committee's earlier query as to whether the on-line Register of Interest form could be amended to include specific non-pecuniary categories within the form, this has also been explored by the Town Clerk and such changes can be implemented. With the Committee's approval the data in the existing registers of interest will be migrated into the new form template with a view to this exercise being completed as soon as possible and by no later than the July recess.
9. Following the recent Annual Update process, the next all-Member update will take place in April 2016.

Corporate & Strategic Implications

10. The annual reminder to review and update Members' declarations satisfies the objectives of the Standards Committee in seeking greater transparency about the City of London Corporation's governance framework and those involved in decision-making processes.

Conclusion

11. The annual reminder process is an important exercise to maximise transparency of the City of London Corporation's decision-making processes and those who serve on the City Corporation's committees and sub-committees. This follow-up to the initial update exercise which commenced in December 2014 highlights the on-going lack of understand by some Members about the requirements of the Members' Code of Conduct and suggests that guidance should be circulated to Members periodically and, where appropriate, refresher training to Members about the Code of Conduct should be scheduled through the formal Member Development Programme. The latest Member Development Session about the role of Members and the Standards regime took place on 21st April 2015 and was attended by three Members of the Court of Common Council.

12. Members are invited to note the current position in respect of the annual update and the subsequent reminder exercise that took place in March 2015 and approve the proposal in respect of the future arrangements for managing Members' Declarations, including the testing and implementation of on-line registration by Members via their intranet page; and the introduction of separate categories of non-pecuniary interests within the on-line form.

Appendices

Appendix 1 - current position in respect of responses and updates to the Members' Registers of Interests Annual Update process and the issuing of reminder correspondence by the Comptroller & City Solicitor.

Background Papers

The Members' Code of Conduct (*as agreed on 16th October 2014*)

Lorraine Brook

Town Clerk's Department

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Members	Letters, Guidance, ROI Sent	Register of Interest Returned	Follow Up Date	Date update live	Comment	March 2015 reminder	March 2015 response
						N/A	
Abrahams, George Christopher	3rd December 2014	30th January 2015	28th January 2015	N/A	No changes.	N/A	
Absalom, John David Deputy	3rd December 2014	4th February 2015	28th January 2015	4th February 2015	Changes made. PS.	N/A	
Anderson, Keith Randall	3rd December 2014	15th December 2014	N/A	15th December 2014	Changes made.	Letter 2 - potentially incomplete	Update received 28/04/15.
Anstee, Nicholas (Alderman)	3rd December 2014	29th January 2015	28th January 2015	30th January 2015	Changes made. DA	N/A	
Ayers, Edwin Kenneth Deputy	3rd December 2014		28th January 2015			Letter 1- no form recieved	N/A. Deputy Ayers resigned from the Court of Common Council on 24/04/15.
Bain-Stewart, Alex	3rd December 2014		28th January 2015			Letter 1- no form recieved	Telephone confirmation that no updates required - 14/04/15
Barker, Alfred John Deputy	3rd December 2014		28th January 2015			Letter 1- no form recieved	
Barrow, Douglas Deputy	3rd December 2014	5th December 2014	N/A	8th December 2014	Changes made.	N/A	
Bear, David Michael, Sir (Alderman)	3rd December 2014	28th January 2015	28th January 2015	29th January 2015	Changes made. KO	N/A	
					Changes made. Non-pecuniary updated on 03/02/14 ND.	N/A	
Bennett, John Deputy (Chief Commoner)	3rd December 2014	28th January 2015	N/A	28th January 2015			
Bensted-Smith, Michael Nicholas	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made.	N/A	
Boden, Paul Christopher	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
Bolea, Mark	3rd December 2014	19th December 2014	N/A	19th December 2014	Changes made.	Letter 2 - potentially incomplete (hospitality specific)	Response received.
Bowman, Charles (Alderman)	3rd December 2014	25th January 2015	N/A	26th January 2015	Changes made. LB	N/A	
Bradshaw, John David	3rd December 2014	11th December 2014	N/A	N/A	No changes required.	Letter 2 - potentially incomplete	Update received 28/04/15
Campbell-Taylor, Goodacre William	3rd December 2014	28th January 2015	28th January 2015	29th January 2015	Changes required. LB	N/A	
Cassidy, Michael John Deputy	3rd December 2014	4th December 2014	N/A	4th December 2014	Changes made.	Letter 2- potentially incomplete	Update received 30/03/15
Chadwick, Holden Arthur Roger	3rd December 2014	24th February 2015	28th January 2015	24th February 2015	Changes made. ND	N/A	
Challis, Kenneth Nigel	3rd December 2014	29th January 2015	28th January 2015	30th January 2015	Changes made. PS	N/A	
Chapman, Douglas John	3rd December 2014	5th December 2014	N/A	8th December 2014	Changes made.	Letter 2- potentially incomplete	
Colthurst, Almroth Nicholas Henry	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made.	Letter 2- potentially incomplete	Update received 30/03/15
Cotgrove, Dennis	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
Deane, Cameron John Alexander Deputy	3rd December 2014	9th December 2014	N/A	10th December 2014	Changes made.	N/A	
Dostalova, Karina	3rd December 2014		28th January 2015			Letter 1- no form recieved	Update received - 24/04/15
Dove, Harry William Deputy	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
Duckworth, D'Olier Simon	3rd December 2014	28th January 2015	N/A	29th January 2015	Changes made. PS	N/A	
Dudley, Raymond Martin Dr. Revd	3rd December 2014		28th January 2015			Letter 1- no form recieved	
Dunphy, Gerard Peter	3rd December 2014	8th December 2014	N/A	8th December 2014	Changes made.	N/A	
Edhem, Emma	3rd December 2014	24th February 2015	28th January 2015	24th February 2015	Changes made. PS	N/A	
Eskenzi, Noel Anthony Deputy	3rd December 2014	28th January 2015	28th January 2015	N/A	No changes required.	Letter 2- potentially incomplete	Updates received - 16/04/15
Estlin, Peter (Alderman)	3rd December 2014	8th December 2014	N/A	10th December 2014	Changes made.	N/A	
Evans, Richard Jeffery (Alderman)	3rd December 2014		28th January 2015			Letter 1- no form recieved	Updates received 07/05/15
Everett, Malcolm Kevin	3rd December 2014	19th December 2014	N/A	19th December 2014	Changes made.	N/A	
Fernandes, Anne Sophie	3rd December 2014	11th February 2015	28th January 2015	11th February 2015	Changes made.	N/A	
Fletcher, William John	3rd December 2014	4th December 2014	N/A	N/A	No chages required.	N/A	
Fraser, Barrie William	3rd December 2014	4th December 2014	N/A	N/A	No changes required.	Letter 2- potentially incomplete	Updates received - 31/03/15
Fraser, John Stuart	3rd December 2014	16th February 2015	28th January 2015	18th March 2015	Forms re-sent on 06/0	N/A	
Fredericks, Bernadette Marianne	3rd December 2014	28th January 2015	29th January 2015	29th January 2015	Changes made. DA	N/A	
Frew, Lucy	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made.	N/A	
Garbutt, John (Alderman)	3rd December 2014	19th December 2014	N/A	19th December 2014	Changes made.	N/A	
Gifford, Roger Sir (Alderman)	3rd December 2014	11th February 2015	28th January 2015	11th February 2015	Changes made.	N/A	
Gillon, Flemington Marr George	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
Ginsburg, Stanley Deputy	3rd December 2014		28th January 2015			Letter 1- no form recieved	
Gowman, Alison (Alderman)	3rd December 2014	18th December 2014	N/A	18th December 2014	Changes made.	Letter 2- potentially incomplete (hospitality and gifts spec	Updates received - 11/04/15
Graves, Andrew David (Alderman)	3rd December 2014	9th January 2015		12th January 2015	Changes made. KO	N/A	
					Changes made. Further chnages made on 18th December 2014.	N/A	
Hailes, Russell Timothy (Alderman)	3rd December 2014	8th December 2014	N/A	8th December 2014			
Haines, Warwick Gordon (Alderman)	3rd December 2014	19th December 2014	N/A	19th December 2014	No chnages required.	Letter 2- potentially incomplete	Update received 30/03/15
Haines, Decatur Stephen, Revd. Deputy	3rd December 2014	8th December 2014	N/A	N/A	No changes required.	N/A	
Harris, Nicholas Brain	3rd December 2014	6th January 2015	N/A	6th January 2015	Changes required. KO	N/A	
Hayward, Michael Christopher	3rd December 2014	6th January 2015	N/A	6th January 2015	Chnages required. KO	N/A	
Hewitt, Peter (Alderman)	3rd December 2014	23rd December 2014	N/A	23rd December 2014	Changes made.	N/A	
Hoffman, Tom	3rd December 2014	22nd December 2014	N/A	22nd December 2014	Changes made. PS	N/A	
Holmes, Ann	3rd December 2014	5th December 2014	N/A	16th December 2014	Changes made.	N/A	

					Email received on 181214 seeking clarification. Changes made.	N/A	
Howard, David Sir (Alderman)	3rd December 2014	22nd December 2014	N/A	22nd December 2014			
Howard, Seymour Picton Robert Deputy	3rd December 2014	24th December 2014	N/A	5th January 2015	Changes made. PS	N/A	
Hudson, Michael	3rd December 2014	18th December 2014	N/A	18th December 2014	PS. Changes made.	N/A	
Hyde, Wendy	3rd December 2014	23rd December 2014	N/A	23rd December 2014	Changes made. JM	N/A	
Ingham- Clark, James	3rd December 2014	5th January 2015	N/A	5th January 2015	Changes made.	N/A	
James, Clare	3rd December 2014	4th December 2014	N/A	8th December 2014	Changes made.	N/A	
Jones, Michael Llewellyn Henry Deputy	3rd December 2014	29th January 2015	28th January 2015	29th January 2015	Changes made. DA	Letter 2 - potentially incomplete	
Jones, Percy Gregory	3rd December 2014	3rd February 2015	28th January 2015	3rd February 2015	Changes made ND.	N/A	
Judge, Paul Sir Sherriff (Alderman)	3rd December 2014	28th January 2015	28th January 2015	29th January 2015	Changes made.	Letter 2 - potentially incomplete (pecuniary interests spe	Update received 30/03/15.
Keaveny, Thomas Vincent (Alderman)	3rd December 2014	11th December 2014	N/A	12th December 2014	Changes made. LB	N/A	
King, Naisbitt John Alastair Deputy	3rd December 2014	11th February 2015	28th January 2015	11th February 2015	Changes made.	N/A	
Knowles, Keith Stanley Deputy	3rd December 2014	5th December 2014	N/A	9th December 2014	Changes made.	N/A	
Lawrence, Alfred Gregory	3rd December 2014	16th December 2014	N/A	16th December 2014	No changes required.	N/A	
Littlechild, Vivienne	3rd December 2014		28th January 2015			Letter 1- no form recieved	Update received - 24/04/15
Lodge, Wynlayne Arthur Oliver	3rd December 2014	18th December 2014	N/A	18th December 2014	Changes made.	N/A	Further updates 12/04/15
Lord, Edward Charles	3rd December 2014	4th December 2014	N/A	4th December 2014	Changes made.	N/A	
Luder, David Ian (Alderman)	3rd December 2014	12th December 2014	N/A	12th December 2014	Changes made by KO	N/A	
Lumley Penton Stuart John	3rd December 2014	29th January 2015	28th January 2015	29th January 2015	Changes made. DA	N/A	
Mainelli, Raymond Michael (Alderman)	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
					Forms re-sent on 15th January 2015.		
Malins, Henry Julian (Alderman)	3rd December 2014	23rd January 2015	N/A	23rd January 2015	Changes made CB.	N/A	
Martirelli, Nicholas Paul	3rd December 2014	10th January 2015	N/A	12th January 2015	Changes made. LB	N/A	
Mayhew, Paul Jeremy	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made.	N/A	
McGuinness, Catherine Deputy	3rd December 2014	22nd December 2014	N/A	22nd December 2014	Changes made.	N/A	Updates received on 02/04/15
McMurtrie, Stratton Andrew	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made.	N/A	
Mead Wendy	3rd December 2014	4th December 2014	N/A	4th December 2014	Changes made.	N/A	
Merrett, Allan Robert	3rd December 2014	10th December 2014	N/A	10th December 2014	Chnages made.	N/A	
Mooney, Francis Desmond Brian	3rd December 2014	4th December	N/A	N/A	No update required	Letter 2- potentially incomplete	Email confirmation received on 31/03/15 that no amendments required.
Moore Wynford Gareth	3rd December 2014	3rd December 2014	N/A	8th December 2014	Changes made.	N/A	
Morris, Fenton Hugh	3rd December 2014	8th December 2014	N/A	N/A	No update required.	Letter 2 - potentially incomplete	Updates received on 02/04/15
Moss, Michael Alastair Deputy	3rd December 2014	19th March 2015	28th January 2015	20th March 2015	Changes made. PS	N/A	
Moys, Doreen Sylvia	3rd December 2014	3rd February 2015	28th January 2015	3rd February 2015	Changes made ND.	N/A	
Nash, Caruthers Joyce Deputy	3rd December 2014	4th December 2014	N/A	N/A	No update required	Letter 2 - potentially incomplete	Updates received on 07/04/15
Newman, Patricia Barbara	3rd December 2014	19th December 2014	N/A	19th December 2014	Changes made. PS	N/A	
Owen Ward, Richard John Deputy	3rd December 2014		28th January 2015		N/A	N/A	John Owen-Ward resigned from the Court of Common Council in March 2015
Packham, David Graham	3rd December 2014	13th January 2015	N/A	13th January 2015	Changes made. LB	N/A	
Parmley, Charles Andrew. Dr (Alderman)	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
Patel Dhruv	3rd December 2014	17th December 2014	N/A	18th December 2014	DA. Changes made. Further changes made on 22/02/15.	N/A	
Pembroke, Francescia Marjorie Ann	3rd December 2014	22nd December 2014	N/A	22nd December 2014	Email received on 181214 seeking clarification. Changes made. PS	N/A	
Pleasance, Lindsay Judith	3rd December 2014		28th January 2015			Letter 1- no form recieved	Updates received 06/05/15
Pollard, George Henry James Deputy	3rd December 2014	11th December 2014	N/A	11th December 2014	Changes made.	N/A	
Price, Louisa Charlotte Emma	3rd December 2014	28th January 2015	28th January 2015	N/A	No changes required.	Letter 2 - potentially incomplete	Updates received 31/03/15
Priest, Sofia Johanna Henrika	3rd December 2014	14th January 2014	N/A	14th January 2014	Changes made. PS	N/A	
Pulman, George Albert Gerald Deputy	3rd December 2014		28th January 2015		Spoke on the phone on 18th December- clarification sought.	Letter 1- no form recieved	Updates received - 14/04/15
Punter, Chris	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made.	N/A	
Quilter, Douglas Stephen	3rd December 2014		28th January 2015			Letter 1- no form recieved	No updates required confirmed via email on 30/04/15
Scotland, Patricia (Alderman)	Sent our post-election	22nd January 2015	N/A	23rd January 2015	New form.	Letter 2- potentially incomplete	Updates received - 07/05/15
Regan, David Richard Deputy	3rd December 2014		28th January 2015			Letter 1- no form recieved	Updates received - 16/04/15
Regis Delis	3rd December 2014	23rd December 2014	N/A	24th December 2014	Changes not required.	N/A	
Richardson, McCloud Fox Adam	3rd December 2014		28th January 2015			Letter 1- no form recieved	
Richardson Matthew (Alderman)	3rd December 2014	9th January 2015	N/A	12th January 2015	Changes made. KO	N/A	

Rogula Elizabeth	3rd December 2014	18th December 2014	N/A	18th December 2014	Changes made. PS	Letter 2- potentially incomplete	Update received 01/05/15
Rounding Virginia	3rd December 2014	16th December 2014	N/A	16th December 2014	Changes made. LB	N/A	
Russell, Bowater Anthony William (Alderman)	3rd December 2014	15th December 2014	n/A	16th December 2014	Changes made.	N/A	
Scott, Stewart George John	3rd December 2014	4th December 2014	N/A	4th December 2014	Changes made	N/A	
Seaton, Norman Christopher Ian	3rd December 2014	22nd December 2014	N/A	23rd December 2014	Changes made. PS	N/A	
Shilson, Evelyn Robert Giles Deputy	3rd December 2014	19th January 2015	N/A	21st January 2015	Changes made. KO	N/A	
Simons, Lewis Jeremy	3rd December 2014	4th December 2014	N/A	4th December 2014	Changes made	N/A	
Sleigh, Tom	3rd December 2014	18th December 2014	N/A	18th December 2014	Changes made.	N/A	
Smith, Martyn Graeme	3rd December 2014	7th December 2014	N/A	8th December 2014	Changes made.	N/A	
Snyder, Michael Sir	3rd December 2014	11th December 2014	N/A	12th December 2014	Changes made.	N/A	Update received on 02/04/15
Starling, Mary Angela	3rd December 2014	10th December 2014	N/A	N/A	No changes required.	Letter 2- potentially incomplete	Updates received on 08/04/15
Streeter, Thomas Patrick	3rd December 2014	5th December 2014	N/A	8th December 2014	Changes made.	N/A	
Thompson, James David	3rd December 2014	N/A	28th January 2015	28th January 2015	No chnages required.	Letter 2- potentially incomplete	Update received 30/03/15
Thomson, Douglas Michael James Deputy	3rd December 2014	23rd December 2014	N/A	23rd December 2014	Changes made. PS	N/A	
Tomlinson, John Deputy	3rd December 2014		28th January 2015			Letter 1- no form recieved	Updates received - 16/04/16
Tumbridge Richard, James	3rd December 2014	10th December 2014	N/A	11th December 2014	Changes made.	N/A	
Welbank, Michael Deputy	3rd December 2014	28th January 2015	29th January 2015	29th January 2015	Changes made.	N/A	
Wheatley, Delano Henry Peter Raymond Mark	3rd December 2014	11th December 2014	N/A	12th December 2014	Changes made. LB	N/A	
Woodhouse, Philip	3rd December 2014	8th January 2015	N/A	8th January 2015	No chnages.	Letter 2 - potentially incomplete	
Woolf, Fiona (Alderman)	3rd December 2014	15th December 2014	N/A	16th december 2014	Changes made. JD	N/A	
Wootton, Hugh David Sir (Alderman)	3rd December 2014	19th December 2014	N/A	19th December 2014	Changes made. CB	N/A	
Yarron, Drake Colin Alan (Alderman)	3rd December 2014	22nd December 2014	N/A	22nd December 2014	Changes made.	N/A	

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Committee(s)	Dated:
Standards Committee	15 th May 2015
Subject: Members' Declarations - Co-opted Members	Public
Joint Report of: The Town Clerk and The Comptroller & City Solicitor	For Decision

Summary

Under the Localism Act 2011, only Co-opted Members who vote on matters relating to the City Corporation's local authority or police authority functions are required to comply with the requirements of the Code of Conduct and disclose statutory pecuniary interests. The City Corporation currently has over 190 Co-opted Members on City Corporation Committees, of which the large majority are non-voting Co-opted Members.

At the Committee's last meeting in February, where Members considered the declaration arrangements in respect of the City Corporation's elected Members, a query was raised as to why only elected Members' declarations were published on-line and why there was a different arrangement in respect of the management of the Co-opted Members declarations.

It was noted that whilst the statutory provisions in relation to on-line registration only applied to those Co-opted Members who were entitled to vote on matters relating to the City Corporation's local authority or police authority functions, this did not preclude the Register of Interests of all Co-opted Members being made available on-line as a matter of policy. It was subsequently agreed, for the sake of consistency and greater transparency, that a Register of Interest should be completed by all Co-opted Members and thereafter published on-line.

At the Committee's request this reports sets out a proposal in respect of the adoption and implementation of a consistent approach to the management and publication of declarations of interest by both the City Corporation's elected and Co-opted Members. This report also confirms that the Court of Common Council's consent to amend the current arrangements in respect of the management of Co-opted Members' declarations is not required. However, it is recommended that the Policy and Resources Committee and the Court of Common Council be informed of the future proposed changes in advance of implementation.

Recommendations

Members are asked to:-

- (i) note the report; and
- (ii) endorse the proposal in respect of the adoption and implementation of a consistent approach to the management and publication of declarations of

interest by both the City Corporation's elected and each of its Co-opted Members that serve on City Corporation Committees.

Main Report

Background

1. At the meeting of the Standards Committee on 20th February 2015, an update report about the Annual Update to Members' Declarations was considered and a query was raised as to why only the Declarations of elected Members were published on-line and why there was a different arrangement in respect of the management of the Co-opted Members declarations.
2. It was noted that whilst the statutory provisions in relation to on-line registration only applied to those Co-opted Members who were entitled to vote on matters relating to the City Corporation's local authority or police authority functions, this did not preclude the Register of Interests of all Co-opted Members being made available on-line as a matter of policy. It was subsequently agreed, for the sake of consistency and greater transparency, that a Register of Interest should be completed by all Co-opted Members and thereafter published on-line.

Current Position

3. Historically, the City Corporation's Co-opted Members have been categorised as voting or non-voting Co-optees serving on the City Corporation's Committees and only those Co-opted Members with voting rights have been requested to submit a register of interest form setting out their pecuniary interests.
4. During the 2014 annual update exercise, all Co-opted Members were contacted in writing and invited to submit a new or updated declaration. The voting Co-opted Members were reminded that submission was a statutory requirement but the non-voting Co-opted Members were advised that, whilst there was no statutory requirement, they were encouraged to submit a declaration in order to maximise transparency. Since that exercise commenced, fifty-one declarations have been received from the City Corporation's Co-opted Members, both voting and non-voting. To date, where completed registers of interest have been received, these have been retained on hard-copy file by the Town Clerk's Department. A follow-up exercise in respect of the updating of Members' Declarations by voting Co-opted Members has not, to date, taken place.

Proposal – Moving Forward

5. The Standards Committee would like to implement a consistent approach to the management and publication of declarations of interest by both the City Corporation's elected and Co-opted Members. Consequently this would streamline the current arrangements whereby all elected and Co-opted Members, with or without voting rights, would be required, upon taking office,

to submit a Members' Declaration form which would include their statutory pecuniary interest and any non-pecuniary interests that have been introduced as a requirement by the City Corporation.

6. In order to implement this new arrangement, the following list of actions and timescales is proposed, taking into account the Committee's earlier acknowledgement that the City Corporation's Co-opted Members should be given plenty of notice about any future changes and a realistic timetable for implementation adopted.

Action	Timescale	Comment
The Town Clerk to review the list of Co-opted Members in light of the April meeting of the Court of Common Council.	By no later than mid-June 2015	
Report (for information) to be submitted to the Policy & Resources Committee and the Court of Common Council setting out the new arrangements.	July 2015	
The Town Clerk to write to all Co-opted Members, voting and non-voting, setting out the background to the new arrangements, providing guidance about the new requirements for all Co-opted Members; and specifying a deadline for the return of all declarations.	By the summer recess (late July 2015)	<i>Separate letters to be sent to voting Co-opted Members so that existing declarations can be circulated and refreshed where necessary.</i>
Creation of on-line webpage for all Co-opted Members and individual registers of interest by the Town Clerk's Department.	By mid-September 2015)	<i>These will remain hidden until the declarations go live.</i>
Deadline for receipt of all declarations.	Mid-September 2015	
Updating of on-line registers by the Town Clerk's Department.	On-going as of submission deadline (as above)	
Standards Committee to review progress.	2 nd October 2015	
Publication of Co-opted Members' on-line registers on the City Corporation's webpages, subject to	As of 3 rd October 2015.	

review by the Standards Committee (as above).		
Further actions to be progressed until the end of the year, subject to review by the Committee in October (as above).	TBC	<i>This might include chase up correspondence being circulated by the Town Clerk.</i>

7. Based on the above proposal, the City Corporation's webpages would be amended before the end of the year to include a section detailing the City Corporation's Co-opted Members by name and including a link to their individual register of interest. It is not proposed that any further details be provided other than their committee appointment/s, as if the case with the elected Members' webpages where contact details, biographies and photographs are published.
8. Each Co-opted Member would, by the end of the year, have a register of interests that is accessible by the public, in the same way as elected Members have. The register would include all statutory pecuniary interests and non-pecuniary interests in line with the requirements for elected Members. The Standards Committee can be kept abreast of progress with implementation at its next scheduled meeting in October 2015 to ensure that there is on-going oversight of implementation of the new arrangements.

Implications

9. This proposal represents a significant change for some of the City Corporation's Co-opted Members, specifically the non-voting Co-opted Members who have previously been advised that the registration regime is not mandatory. Clear guidance will therefore need to be drafted by the Comptroller & City Solicitor and circulated to those Co-opted Members with timescales that enable Co-opted Members to raise queries and seek clarification about the new requirements. Given the significance of the proposed changes, consideration should also be given to whether a number of training sessions should be offered to Co-opted Members (potentially around formal meetings) after the recess but ahead of the deadline for submissions.
10. With regard to the voting Co-opted Members guidance will also need to be provided to clarify the new arrangements, specifically in respect of the introduction on-line publication.
11. With regard to the issue of non-compliance, for the majority of Co-opted Members (i.e. those that are not voting Co-opted Members), non-compliance will not constitute a criminal offence. However, non-compliance could be

deemed to be a breach of the Code of Conduct and a complaint could therefore be investigated by the Standards Committee.

Corporate & Strategic Implications

12. The adoption and implementation of a consistent approach to the management and publication of declarations of interest by both the City Corporation's elected and Co-opted Members enhances transparency about the City of London Corporation's governance framework and those involved in decision-making processes.
13. A significant amount of work will be required to implement the proposed arrangements. This work will, with oversight by the Comptroller and City Solicitor, be largely undertaken by the Town Clerk's Department and as such will have to be prioritised around other commitments. Consequently, a phased approach to implementation is proposed which will ensure that there is not only clarity for Co-opted Members about the new requirements, but the timescales for implementation are realistic and the system and procedures for managing and publishing the declarations are given appropriate consideration ahead of going live.

Conclusion

14. The adoption and implementation of a consistent approach to the management and publication of declarations of interest by both the City Corporation's elected and each of its Co-opted Members that serve on City Corporation Committees will ensure that there is a reasonable and consistent approach to the management of declarations of interest. The proposed approach, whereby all Co-opted Members are invited to submit a declaration of interest when they take office and then review this annually during the annual update exercise every April, will mean that all individuals who serve on City Corporation Committees are bound by the same requirements. This will enhance transparency of the City Corporation's decision making arrangements and ensure consistency in how declarations are managed. Publication of the declarations of interest on-line will further enhance transparency about the organisation's decision-making arrangements and highlight the important contribution that Co-opted Members make to the work of the City Corporation.
15. Members are invited to note the current position in respect of the arrangements for managing declarations of interest by Co-opted Members and endorse the proposal in respect of the introduction of new requirements.

Appendices

Appendix 1 – List of Co-opted Members

Background Papers

The Members' Code of Conduct (*as agreed on 16th October 2014*)

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Comptroller & City Solicitor
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Committee(s)	Dated:
Standards Committee	15 th May 2015
Subject: Complaints Process Review	Public
Joint report of: The Town Clerk and The Comptroller & City Solicitor	For Information

Summary

At the last meeting of the Committee on 20th February 2015, following a discussion about the Committee's terms of reference and frequency of future meetings, Members requested a review of the current complaints procedure in respect of alleged breaches of the Code of Conduct by the City Corporation's Members and Co-opted Members.

This report sets out the current complaints procedure and the governance arrangements in respect of the Sub Committees that are constituted to consider any alleged breaches of the Code of Conduct. The report invites Members of the Standards Committee to consider and comment on the current complaints process.

Recommendation

Members are asked to note the report and the existing arrangements in respect of responding to and managing alleged breaches of the Members' Code of Conduct.

Main Report

Background

1. At the meeting of the Standards Committee on 20th February 2015, following a discussion about the Committee's terms of reference and frequency of future meetings, Members requested a review of the current complaints procedure in respect of alleged breaches of the Code of Conduct by the City Corporation's Members and Co-opted Members.
2. The current complaints procedure, as set out in Appendix 1, has existed since it was approved by the Standards Committee on 23rd November 2012, following the introduction of the Localism Act 2011 which required the City Corporation to have arrangements under which written allegations of a breach of the Member Code of Conduct could be investigated and decisions on those allegations could be taken.
3. In November 2012, the previous Complaints Procedure (How Complaints Submitted To The City Of London's Standards Committee Will Be Dealt With) was amended to reflect the changes introduced through the Act, including the

statutory role of the newly created Independent Person/s in the complaints process.

4. At that time it was noted that the informal resolution of some complaints by the Chief Commoner or the Chairman of the Privileges Committee of Aldermen did not prejudice the requirement for all formal written complaints to be dealt with by the Standards Committee. It was also noted that over a 10-year period, prior to November 2012, the Standards Committee had only considered one complaint, which had been deemed vexatious and had been dismissed by the Committee. The alleged breach of the Code of Conduct was considered by an Assessment Sub (Standards) Committee on 24th February 2014 which concluded unanimously that no investigation should take place in relation to any of the allegations and nor was any other action appropriate in the circumstances. The Independent Person was of the same view. No further complaints have been received following the introduction of the revised Complaints Procedure.
5. In approving the revised Complaints Procedure in November 2012, Members noted that the arrangements must be flexible to allow Officers to make minor amendments to the handbook to capture and deal with matters arising in the future. Since this time the procedure, as appended, has been amended slightly in light of the alleged breach that was considered in February 2014. Additionally, the request for a complaint's equality data which was included in the complaint form was removed upon advice from HR.

Current Position

6. The Complaints Procedure is also appended to the new Standards Committee Handbook which is before the Committee for consideration at item 10.
7. Whilst the existing Complaints Procedure fulfils the requirements of the Localism Act 2011, the Standards Committee has requested the opportunity to review the current arrangements, specifically in respect of the arrangements for consulting with the Independent Person/s following an alleged breach of the Code of Conduct.

Corporate & Strategic Implications

8. The Standards Committee's complaints procedure clearly sets out the City of London Corporation's arrangements for the management of alleged breaches of the Code of Conduct by Members and Co-opted Members and ensures that that the organisation's governance framework is robust and transparent.

Conclusion

9. It is important that the City Corporation has a robust and transparent governance framework of which the Complaints Procedure is one aspect. Members are therefore invited to review and comment on the existing procedure.

Appendices

Appendix 1 - Complaints Procedure (How Complaints Submitted To The City Of London's Standards Committee Will Be Dealt With)

Appendix 2 – Complaints Form

Background Papers

Report and minutes - Standards Committee, 23 November 2012

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HOW COMPLAINTS SUBMITTED TO THE CITY OF LONDON'S STANDARDS COMMITTEE WILL BE DEALT WITH

INTRODUCTION

The Localism Act 2011 requires the City of London Corporation (“the City”) to have in place arrangements under which written allegations of a breach of the member code of conduct can be investigated and decisions on those allegations taken. These arrangements apply to both members and co-opted members (referred to in this document collectively as “members”).

The City’s Standards Committee is responsible for these functions and this handbook sets out to explain the arrangements in more detail.

COMPLAINTS

MAKING A COMPLAINT

The City’s complaints process is publicised on the complaints and corporate governance pages of our website and explains where code of conduct complaints should be sent to. This is to ensure that members of the public are aware of the responsibility for handling code of conduct complaints and what the process entails.

A complaints form can be accessed via the website so that anyone wishing to make a complaint can download the form and either return it by e-mail or send in a hard copy. Alternatively, a complaints form can be requested from the Town Clerk’s Office. Complaints must be submitted in writing and this includes fax and electronic submissions.

The form covers the following matters:-

- Complainant’s name, address and contact details;
- Complainant’s status i.e. fellow member, member of the public or officer;
- Who the complaint is about;
- Details of the alleged misconduct including, where possible, dates, witness details and other supporting information;
- Equality monitoring data if applicable;
- A warning that the complainant’s identity will normally be disclosed to the subject member. (N.b. in exceptional circumstances, and at the discretion of the Standards Committee, this information may be withheld).

Once a complaint is received at the City, and the complaint specifies or appears to specify that it is in relation to the code of conduct, then it will be passed to

the Assessment Sub-Committee for consideration. If at this stage (or a later stage) it appears that a criminal offence may have been committed then the relevant allegation will be referred to the police.

A complaint may not necessarily be made in writing, for example it may be a concern raised with the monitoring officer verbally. In such cases, the monitoring officer should ask the complainant whether they want to formally put the matter in writing to the Standards Committee. If the complainant does not, the monitoring officer should consider the options for informal resolution to satisfy the complainant. (For example, a meeting with the Chief Commoner or Chairman of the Privileges Committee of Aldermen).

ACKNOWLEDGING RECEIPT OF A COMPLAINT

The monitoring officer has the discretion to take the administrative step of acknowledging receipt of a complaint and telling the subject member that a complaint has been made about them.

The notification can say that a complaint has been made, and state the name of the complainant (unless the complainant has requested confidentiality and the Standards Committee has not yet considered whether to grant it) and the relevant paragraphs of the code that may have been breached. A copy of the complaint may be provided unless to do so would breach confidentiality where this has been requested.

There is a possibility that by informing the subject member of the complaint, they may interfere with evidence or intimidate witnesses. Whilst this is a remote possibility, the monitoring officer has the discretion, after consultation with the Chairman of the Standards Committee, to defer notification in such exceptional circumstances to enable a proper investigation to take place.

STANDARDS SUB-COMMITTEES

ASSESSMENT, HEARING AND APPEAL SUB-COMMITTEES

In order to carry out its functions efficiently and effectively, and to avoid any conflicts of interest, the Standards Committee has established three separate Sub-Committees for the different stages of the complaints process, being Assessment, Hearing and Appeal Sub-Committees.

MEMBERSHIP

Each of these Sub-Committees will normally consist of four members of the Standards Committee, including three elected members of the City and one non-voting co-opted member, with membership to be determined on a case by case basis. The same members will normally sit on the Assessment Sub-Committee and the Hearing Sub-Committee in respect of a particular allegation, but different members will sit on the Appeal Sub-Committee, if this is required. Each of these Sub-Committees will take into account the views of an Independent Person appointed under the Localism Act 2011.

ACCESS TO MEETINGS AND PUBLICATION OF DECISIONS

Meetings of these Sub-Committees are subject to the same provisions regarding public access to information as any other Committee.

After a Sub-Committee has reached a decision, it will produce a written summary to include:-

- The main points of the matter considered;
- The decision reached; and
- The reasons for that decision.

The written summary will be sent to the relevant parties. A written summary (excluding exempt information heard in non-public session) will be made available for the public to inspect at the City's offices for six years but not until the subject member has been sent the summary.

INITIAL ASSESSMENT OF ALLEGATIONS

PRE-ASSESSMENT REPORTS AND ENQUIRIES

The Assessment Sub-Committee may decide that it wants the monitoring officer, or other officer, to prepare a short summary of the complaint for it to consider. This could, for example, set out the following details:-

- Whether the complaint is within jurisdiction;
- The paragraphs of the code the complaint might relate to, or the paragraphs the complainant has identified;
- A summary of key aspects of the complaint if it is lengthy or complex;
- Any further information that the officer has obtained to assist the Assessment Sub-Committee with its decision – this may include:-

- Obtaining a copy of a declaration of acceptance of office form;
- Minutes of meetings;
- A copy of a member's entry in the Register of Interests;
- Information from Companies House or the Land Registry;
- Other easily obtainable documents.

Officers may also contact complainants for clarification of their complaint if they are unable to understand the document submitted.

Caution should be exercised in order to ensure that pre-assessment enquiries are not carried out in such a way as to amount to an investigation e.g. they should not extend to interviewing the complainant or a potential witness.

Officers should not seek opinions on an allegation rather than factual information as this may prejudice any subsequent investigation. They should also ensure their report does not influence improperly the Assessment Sub-Committee's decision or make the decision for it.

ASSESSMENT SUB-COMMITTEE TERMS OF REFERENCE

- a) The Assessment Sub-Committee is established to receive and assess allegations that a member of the City has failed, or may have failed, to comply with the code of conduct.
- b) Upon receipt of each allegation and any accompanying report by the monitoring officer, the Sub-Committee will make an initial assessment of the allegation and will then do one of the following:-
 - (i) refer the allegation to the monitoring officer, with an instruction that he arrange a formal investigation of the allegation; or
 - (ii) direct the monitoring officer to arrange training, conciliation or other appropriate alternative steps; or
 - (iii) decide that no action should be taken in respect of the allegation.

ASSESSMENT OF COMPLAINTS

Before the assessment of a complaint begins, the Assessment Sub-Committee should be satisfied that the complaint meets the following tests:-

- It is a complaint against one or more named members of the City;
- The named member was in office at the time of the alleged conduct and the code of conduct was in force at the time;
- The complaint, if proven, would be a breach of the code of conduct under which the member was operating at the time of the alleged misconduct.

In the complaint fails one or more of these tests, it cannot be investigated as a breach of the code and the complainant must be informed that no further action will be taken in respect of the complaint.

DEVELOPING ASSESSMENT CRITERIA

The Standards Committee may develop criteria against which it assesses new complaints and decides what action, if any, to take. These criteria should ensure fairness for both the complainant and the subject member.

Assessing all new complaints by established criteria will also protect the Committee members from accusations of bias. In drawing up assessment criteria, the Standards Committee will bear in mind the importance of ensuring complainants are confident that complaints are taken seriously and dealt with appropriately, whilst appreciating that a decision to investigate a complaint or to take other action will cost both public money and the officers' and members' time – an important consideration where the matter is relatively minor.

The following questions constitute the current assessment criteria:-

- Has the complainant submitted enough information to satisfy the Assessment Sub-Committee that the complaint should be referred for investigation?
- Has the complaint already been the subject of an investigation or other action relating to the code of conduct? Similarly, has the complaint been the subject of an investigation by other regulatory authorities?
- Is the complaint about something that happened so long ago that there would be little benefit in taking action now?
- Is the complaint too trivial to warrant further action?
- Does the complaint appear to be simply malicious, politically motivated or tit-for-tat?

INITIAL ASSESSMENT DECISIONS

The Assessment Sub-Committee will normally complete its initial assessment of an allegation within an average of 30 working days to reach a decision on what should happen with the complaint.

The summary at this stage may give the name of the subject member unless doing so is not in the public interest or would prejudice any subsequent investigation.

The monitoring officer will write to the relevant parties to advise who will be responsible for conducting the investigation, if applicable.

The Assessment Sub-Committee may decide that other action (rather than an investigation) would be appropriate and it may ask the monitoring officer to arrange this.

The suitability of “other action” is dependent on the nature of the complaint. Deciding to deal pro-actively with a matter in a positive way that does not involve an investigation can be a good way of resolving less serious matters. Examples of alternatives to investigation are:-

- Arranging for the subject member to attend a training course;
- Arranging for the subject member and complainant to engage in a process of conciliation;
- Instituting changes to a procedure of the City if this has given rise to the complaint.

The Assessment Sub-Committee should always seek the advice of the monitoring officer before it decides on this course of action. It may be useful for the Assessment Sub-Committee to seek written confirmation from all involved parties that they will co-operate with the process of other action proposed. In this case, a letter should be written to parties outlining what is being proposed, why it is being proposed, why they should co-operate and what the Assessment Sub-Committee is hoping to achieve.

The Assessment Sub-Committee can decide that no action is required in respect of a complaint. This could be if they do not consider the complaint to be serious enough, or if a long time has elapsed since the alleged conduct took place, or if there is clearly no case to answer. The decision reached by the Assessment Sub-Committee and the reasons for it should adhere to any assessment criteria that the Standards Committee has previously agreed.

INVESTIGATIONS AND HEARINGS

INVESTIGATION

It is recognised that the monitoring officer may not personally conduct a formal investigation but it will be for the monitoring officer to determine who to instruct to conduct a formal investigation.

There are many factors that can affect the time it takes to complete an investigation. However most investigations will be carried out, and a report on the investigation completed, within six months of the original complaint being assessed. In his report, the investigator will conclude whether or not there has been a failure to observe the code of conduct. Any hearing will normally be held within three months of receipt of the report.

HEARING SUB-COMMITTEE TERMS OF REFERENCE

- a) To hear and determine any allegation that a member has failed, or may have failed, to comply with the code of conduct for members;
- b) Following the hearing, to make one of the following findings:-
 - (i) that the subject member has not failed to comply with the code of conduct;
 - (ii) that the subject member has failed to comply with the code of conduct but that no action needs to be taken in respect of the matters considered at the hearing;
 - (iii) That the subject member has failed to comply with the code of conduct and that a sanction should be imposed.
- c) If the Sub-Committee makes a finding under paragraph b) (iii), it may impose any one of or any combination of sanctions that are available, as set out below.

HEARING SUB-COMMITTEE DECISIONS

If the Hearing Sub-Committee finds that a subject member has failed to follow the code of conduct and that they should be sanctioned, it may impose any one or a combination of the following:-

- censure of that member;

- withdrawal of City hospitality for an appropriate period;
- removal of that member from a particular committee or committees.

The option of removal from a particular committee or committees includes sub-committees. The Hearing Sub-Committee will make a recommendation to the relevant appointing body in each case.

The Hearing Sub-Committee has no power to impose any alternative sanctions, although the willingness of a member to co-operate in the matters listed below may have a bearing on any sanction that is imposed:-

- that the member submits a written apology in a form specified by the Hearing Sub-Committee;
- that the member undertakes such training as the Hearing Sub-Committee specifies;
- that the member participates in such conciliation as the Hearing Sub-Committee specifies.

APPEALS

APPEAL PROCESS

If a member is aggrieved by a decision of the Hearing Sub-Committee to impose one or more sanctions against him, either because he does not accept that he has breached the code of conduct, or because he considers that the sanction or sanctions imposed are disproportionate, he is entitled to appeal to the Appeal Sub-Committee.

Any such request must be sent in writing to the clerk to the Appeal Sub-Committee and received by him within 21 days from the date that the subject member is informed of the decision of the Hearing Sub-Committee. The Appeal Sub-Committee will normally complete its review of the decision within an average of 30 working days following receipt of the request.

APPEAL SUB-COMMITTEE TERMS OF REFERENCE

- a) To determine any appeal from a member in relation to a finding of the Hearing Sub-Committee that they have breached the code of conduct

and/or in relation to the sanction imposed, in accordance with paragraph b);

- b) Having due regard to the decision of the Hearing Sub-Committee, to substitute any alternative decision for that decision that the Appeal Sub-Committee considers is appropriate, being a decision that the Hearing Sub-Committee had the power to make.



COMPLAINT FORM

YOUR DETAILS

1. Please provide us with your name and contact details:

Title:	
First name:	
Last name:	
Address:	
Daytime telephone:	
Evening telephone:	
Mobile telephone:	
Email address:	

Your address and contact details will not usually be released unless necessary or to deal with your complaint.

However, we will tell the following people that you have made this complaint:-

- The Member that you are complaining about;
- The Monitoring Officer of the City of London Corporation.

We will tell them your name and give them a summary of your complaint. We will give them full details of your complaint where necessary or appropriate to be able to deal with it. If you have serious concerns about your name and a summary, or details of your complaint being released, please complete section 6 of this form.

2. Please tell us which complainant type best describes you:

- Member of the public
- An elected or co-opted Member of an authority
- An Independent Member of the Standards Committee
- Member of Parliament
- Local Authority Monitoring Officer
- Other Council officer or authority employee
- Other (please specify.....)

MAKING YOUR COMPLAINT

3. Please provide us with the name of the Member(s) you believe have breached the Code of Conduct and the name of their authority:

Title	First name	Last name	Authority

4. Please explain in this section (or on separate sheets) what the member has done that you believe breaches the Code of Conduct. If you are complaining about more than one member, you should clearly explain what each individual person has done that you believe breaches the Code of Conduct.

It is important that you provide all the information you wish to have taken into account by the assessment sub Committee when it decides whether to take any action on your complaint. For example:-

- You should be specific, wherever possible, about exactly what you are alleging the member said or did. For instance, instead of writing that the member insulted you, you should state what it was they said.
- You should provide the dates of the alleged incidents wherever possible. If you cannot provide exact dates, it is important to give a general timeframe.

- You should confirm whether there are any witnesses to the alleged conduct and provide their names and contact details if possible.
- You should provide any relevant background information.

Please provide us with the details of your complaint. Continue on a separate sheet if there is not enough space on this form.

**ONLY COMPLETE THIS NEXT SECTION IF YOU ARE REQUESTING
THAT YOUR IDENTITY IS KEPT CONFIDENTIAL**

- 5.** In the interests of fairness and natural justice, we believe Members who are complained about have a right to know who has made the complaint. We also believe that they have the right to be provided with a summary of the complaint. We are unlikely to withhold your identity or the details of your complaint unless:
- You have reasonable grounds for believing that you will be at risk of physical harm if your identity is disclosed;
 - You are an officer who works closely with the subject Member and you are afraid of the consequences to your employment or of losing your job if your identity is disclosed;
 - You suffer from a serious health condition and there are medical risks associated with your identity being disclosed.

Please note that requests for confidentiality or requests for suppression of complaint details will not be automatically granted. The Assessment sub-Committee will consider the request alongside the substance of your complaint. We will then contact you with the decision. If your request for confidentiality is not granted, we will usually allow you the option of withdrawing your complaint.

However, it is important that in certain exceptional circumstances where the matter complained about is very serious, we can proceed with an investigation or other action and disclose your name even if you have expressly asked us not to.

Please provide us with the details of why you believe we should withhold your name and/or details of your complaint. Continue on a separate sheet if there is not enough space on this form:

6. ADDITIONAL HELP

Complaints must be submitted in writing. However, in line with the requirements of the Disability Discrimination Act 2000, we can make reasonable adjustments to assist you if you have a disability that prevents you from making your complaint in writing. We can also help if English is not your first language.

If you need any support in completing this form, please let us know as soon as possible.

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Committee	Dated:
Standards Committee – For Information	15 May 2015
Subject: Draft Annual Report of the Standards Committee	Public
Report of: The Town Clerk	For Decision

Summary

The Standards Committee is required to monitor all complaints referred to it and to prepare an annual report on its activity for submission to the Court of Common Council. It should be noted that no allegations of breaches of the Code of Conduct were made to the Committee during the course of 2014/15.

Recommendations

It is recommended that:-

- (a) the contents of the annual report be noted; and,
- (b) in accordance with the Committee's terms of reference, the annual report be referred to the Court of Common Council for information.

Main Report

Background

1. The purpose of this report is to brief Members on the work undertaken over the last year by the Committee.
2. In accordance with the Committee's terms of reference, the Committee is required to monitor all complaints referred to it and to submit an annual report on its activities to the Court of Common Council.

Complaints to the Standards Committee

3. During the period of this report, no allegations of breaches of the Members' Code of Conduct have been made to the Committee during the course of 2014/15.

Activities of the Committee during 2014/15

4. Below is a brief synopsis of the activities undertaken by the Committee in 2014/15.

Code of Conduct

5. The Standards Committee is required to prepare, keep under review and monitor the City of London Corporation's Members' Code of Conduct and make

recommendations to the Court of Common Council in respect of the adoption or revision, as appropriate, of such Code of Conduct.

6. In July 2014 an early version of the revised Members' Code of Conduct was submitted to the Court. There was considerable debate and it was agreed that further consideration should be given to the terms of the draft Code. Consequently, all Members of the Court were invited to attend a special meeting of the Standards Committee in September and an amended version was circulated to all Members for further comment.
7. A revised version of the Code, taking these comments into account, and the introduction of a mandatory registration regime for gifts and hospitality was then submitted and approved by the Court of Common Council at their meeting on 16 October 2014, with the new requirements coming into effect as of 1st January 2015.
8. A Member Development session on the Code of Conduct and Lawful Decision Making, delivered by the Comptroller & City Solicitor, took place on 21st April 2015 and was attended by three Members of the Court. On-going training both informally and formally through the Member Development Programme will continue to be provided to Members on a regular basis.

Membership and composition of the Standards Committee

9. The Standards Committee comprises twelve Members, four of whom are co-opted and are independent from the City Corporation. Whilst Co-opted Members are no longer a statutory requirement and have no formal vote, following the introduction of the Localism Act 2011, the City of London Corporation has agreed to the inclusion of Co-opted Members on the Committee to maximise the breadth of knowledge and experience available.
10. In September 2014, two further Co-opted Members - Mr Mark Greenburgh and Mr Dan Large - were appointed to the Standards Committee. Collectively, the Co-opted Members have regularly attended scheduled meetings of the Committee and continue to play an important role in monitoring and reviewing the City Corporation's governance arrangements. The City Corporation's three Independent Persons have also regularly attended the Committee's meetings.

Annual Update to the Members' Declarations

11. An annual update to the Members' Declarations took place in December 2014 following the introduction of new requirements in the Members' Code of Conduct.
12. Following the Court's consent to the Code of Conduct on 16th October 2014, revised guidance was thereafter approved by the Standards Committee and the annual reminder process commenced in early December 2014. Each of the City of London Corporation's elected Members and Co-opted Members were contacted in writing in December 2014; it was noted that as at 11 January 2015, 106 elected Members had responded to the request for updates.

13. In light of that position, at its meeting in February 2015 the Committee escalated the issue of partial and non-compliance with the registration requirements and a formal communication was issued to a number of Members by the Comptroller and City Solicitor, in his capacity as the Monitoring Officer. In response, a number of further updates were made to those registers of interest where partial or non-compliance had been identified. However, the annual update process has been very slow and a number of Members did not respond to the Committee's request that up-to-date registers be maintained. In advance of the 2016 annual update process, which will take place in April 2016, the Committee will write to all Members in advance to highlight the importance of the annual update process.
14. Where necessary, Members of the Court are routinely submitting updates to their register of interest and the registers are updated on-line.
15. With regard to the registration requirements for the City Corporation's Co-opted Members, this matter is currently being reviewed with a view to the introduction of a system of on-line registration of all declarations made by the City Corporation's Co-opted Members.

Gifts and Hospitality - Ceremonial Officeholders

16. At their meeting in February 2015, the Committee considered a report of the Private Secretary and Chief of Staff relative to the arrangements for ceremonial officeholders in respect of gifts and hospitality, which had been considered by the General Purposes Committee of Aldermen on 10 February 2015 following a discussion of the issue at the previous meeting of the Standards Committee.
17. With regards to the receipt of hospitality, it was agreed that the same financial thresholds for hospitality should apply to the Lord Mayor as for other Members of the Court unless diplomatic, commercial or political sensitivities were a consideration in which case such instances would be reported to the Committee rather than via the published register. The new provisions ensure that there is greater transparency about the gifts and hospitality received by ceremonial officeholders such as the Lord Mayor and, in light of its implementation, the Committee will review the arrangements and scrutinise the register in early 2016. Similar arrangements for other ceremonial officeholders such as the Sheriffs will now be progressed in consultation with the Secondary and Under Sheriff.

Dispensations

18. In February the Committee reviewed the arrangements in respect of the granting of dispensations by the City of London Corporation to Members who wish to speak and/or vote on matters where they have a relevant interest. The Committee concluded that the arrangements, whereby a Member is required to submit a detailed written request to the Dispensations Sub (Standards) Committee setting out the reasons for the request and how long the dispensation is required for, are satisfactory and enable the Standards Committee and/or the Dispensations Sub Committee to be able to continuously

review the granting of dispensations and ensure that there is a consistent approach.

Recommendation

19. It is recommended that:-

- (i) the contents of the annual report be noted; and,
- (ii) in accordance with the Committee's terms of reference, the annual report be referred to the Court of Common Council for information.

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