



Assessment Sub-Panel of the Panel of Independent Persons

Date: TUESDAY, 30 APRIL 2024

Time: 11.00 am

Venue: HYBRID MEETING

Members: Karen McArthur, Independent Person
Gary Rogers, Independent Person
Rahul Sinha, Independent Person

Enquiries: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **APPOINTMENT OF A CHAIR**

For Decision
4. **MEMBERS' CODE OF CONDUCT AND COMPLAINTS PROCEDURE**

For Information
(Pages 5 - 34)
5. **QUESTIONS RELATING TO THE WORK OF THE SUB-PANEL**
6. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
7. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of the grounds that they involve the likely disclosure of exempt information as defined by Part I of Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

8. **ALLEGED BREACH OF THE MEMBERS' CODE OF CONDUCT**

For Decision
(Pages 35 - 52)
9. **SUBJECT MEMBERS RESPONSES:**
 - a) Subject Member A (Pages 53 - 66)
 - b) Subject Member B (Pages 67 - 84)

- c) Subject Member C (Pages 85 - 86)
- d) Subject Member D (Pages 87 - 110)
- e) Subject Member E (Pages 111 - 114)
- f) Subject Member F (Pages 115 - 116)

For Decision

- 10. **ALLEGED BREACH OF THE MEMBER'S CODE OF CONDUCT -
CONSIDERATION OF REQUEST FOR ANONYMITY**

For Decision
(Pages 117 - 124)

- 11. **NON-PUBLIC QUESTIONS RELATING TO THE WORK OF THE SUB-PANEL**

- 12. **NON-PUBLIC ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

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Adopted by the Court of Common Council on 16 July 2020.



CODE OF CONDUCT FOR MEMBERS IN RESPECT OF THE CITY OF LONDON CORPORATION'S LOCAL AUTHORITY, POLICE AUTHORITY AND NON-LOCAL AUTHORITY FUNCTIONS

1. You are a member of the City of London Corporation ("the Corporation") or a member of a committee of the Corporation (in this Code collectively referred to as a "Member") and hence you shall have regard to the Seven Principles of Public Life –

- a) **SELFLESSNESS:** Holders of public office should act solely in terms of the public interest.
- b) **INTEGRITY:** Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

NB - This Principle applies only to conduct by a Member in their capacity as a Member which may foreseeably lead to the Member being subjected to inappropriate influence in the performance of their duties. It does not apply to contracts of employment, service or other formal and informal business relationships entered into by Members in their private capacities and which are dealt with by the rules on disclosable pecuniary and non-pecuniary interests.

- c) **OBJECTIVITY:** Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- d) **ACCOUNTABILITY:** Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- e) **OPENNESS:** Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- f) **HONESTY:** Holders of public office should be truthful.
- g) **LEADERSHIP:** Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

2. As a Member your conduct shall in particular address the Seven Principles of Public Life by:
- a) Championing the public interest, taking into account the needs of your constituents, including those that did not vote for you, and the community as a whole.
 - b) Dealing with representations or enquiries from residents, City voters, members of our communities and visitors fairly, appropriately and impartially.
 - c) Not allowing other pressures, including the financial interests of yourself or others connected to you, to deter you from pursuing constituents' casework, the interests of the Corporation or the good governance of the Corporation in a proper manner.
 - d) Exercising independent judgement and not compromising your position by allowing individuals or organisations to improperly influence you in the performance of your official duties by means of any financial or other obligations.
 - e) Listening to the interests of all parties, including relevant advice from statutory and other professional officers, taking all relevant information into consideration, remaining objective and making decisions on merit.
 - f) Being accountable for your decisions and co-operating when scrutinised internally and externally, including by constituents.
 - g) Contributing to making the Corporation's decision-making processes as open and transparent as possible to enable constituents to understand the reasoning behind those decisions and to be informed when holding you and other Members to account, and not seeking to prevent any person from obtaining information that they are entitled to by law.
 - h) Restricting access to information when the wider public interest or the law requires it, and not disclosing confidential information, unless you are entitled to by law – refer to the Monitoring Officer if you are unsure.
 - i) Behaving in accordance with all of the Corporation's legal obligations, alongside any requirements contained within the Corporation's policies, protocols or procedures, including on the use of the Corporation's resources.
 - j) Ensuring that, when using or authorising the use by others of the resources of the Corporation, such resources are not used improperly for political purposes (including party political purposes) and having regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.
 - k) Valuing your colleagues and officers of the Corporation and engaging with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance.
 - l) Always treating people with respect, including the organisations and constituents that you engage with and those that you work alongside, and not bullying,

harassing (including sexually harassing), intimidating or attempting to intimidate any person. (See Appendix 1 for definitions of bullying and harassment.)

- m) Not doing anything which could reasonably be regarded as bringing your office or authority into disrepute.
- n) Upholding the Corporation's obligations under the Equality Act 2010 by promoting equality, and not discriminating unlawfully against any person on the grounds of race, gender, disability, religion or belief, sexual orientation or age. The Corporation has adopted the International Holocaust Remembrance Alliance definition of antisemitism (see Appendix 2).
- o) Registering and declaring any private interests, both pecuniary and non-pecuniary, that relate to your public duties in a manner conforming with the procedures set out below.
- p) Providing leadership through behaving in accordance with these principles when championing the interests of constituents with other organisations as well as within the Corporation.

Registering and declaring pecuniary and non-pecuniary interests

3. You must, within 28 days of taking office as a Member, notify the Town Clerk (on behalf of the Corporation's Monitoring Officer) of any disclosable pecuniary interest as defined by regulations made by the Secretary of State, where the pecuniary interest is yours, your spouse's or civil partner's, or is the pecuniary interest of somebody with whom you are living with as a husband or wife, or as if you were civil partners, together with any non-pecuniary interests of yours described in paragraph 7 below and thereafter maintain an up to date register of any such interests.
4. The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 (Appendix 3) currently define disclosable pecuniary interests under the following categories:
 - a) Employment, office, trade, profession or vocation
 - b) Sponsorship
 - c) Contracts
 - d) Land
 - e) Licences
 - f) Corporate tenancies
 - g) Securities
5. Where you believe you have a sensitive interest¹, you should apply to the Monitoring Officer (via the Town Clerk) for exemption from the requirement that details of the interest be published and made available for inspection.

¹ A 'sensitive interest' is described in the Localism Act 2011 as a member or co-opted member of an authority having an interest, and the nature of the interest being such that the member or co-opted member, and the authority's monitoring officer, consider that disclosure of the details of the interest could lead to the member or co-opted member, or a person connected with the member or co-opted member, being subject to violence or intimidation.

6. In addition, you must, within 28 days of taking office as a Member, and thereafter on an ongoing basis, notify the Corporation's Monitoring Officer (via the Town Clerk) of any other pecuniary or non-pecuniary interest which you consider should be included on your Members' Declaration form if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life.
7. In any event you are required to disclose your membership of any:
 - (a) Management board or similar organ of any charity or body directed to a charitable purpose (e.g. a trustee or director) but excluding any charity or other such body administered by the Corporation
 - (b) Club or Society active in the City of London or which relates to any functions of the Corporation
 - (c) Fraternal or Sororal Societies
 - (d) Livery Company, City Company without Livery, Guild or Company seeking Livery
 - (e) Political Party
 - (f) Organisation, one of whose principal purposes includes the influence of public opinion or policy, and which is likely to seek to affect the policy of the Corporation or which may have an impact on its services or stakeholders
 - (g) Professional Association
 - (h) Trade Association
 - (i) Trade Union
 - (j) Management board or similar organ of any organisation not falling within paragraph 3 or sub-paragraphs (a)-(i) above.
8. You must also notify the Corporation's Monitoring Officer (via the Town Clerk) of any gift or hospitality received by you as a Member with a value of £100 or more, or multiple gifts and/or instances of hospitality with a cumulative value of £200 or more when received from a single donor within a rolling twelve month period. Such notification must be made within 28 days of receipt, or within 28 days of reaching the cumulative threshold, as appropriate.
9. Special provision shall be made for the Lord Mayor and other holders of special offices in relation to the registration of gifts and hospitality to be set out in Guidance to be issued by the Standards Committee.
10. Entries shall be retained in the register of gifts and hospitality for three years – older entries will be removed.
11. If an interest has not been entered onto the Corporation's register, then the Member must disclose the interest to any meeting of the Corporation at which they are present, where they have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'¹.
12. Following any disclosure of an interest not on the Corporation's register or the subject of pending notification², you must notify the Monitoring Officer (via the Town Clerk) of the interest within 28 days beginning with the date of disclosure.

² This is where an interest has been notified to the Monitoring Officer but has not yet been entered on the register.

13. Unless dispensation has been granted, you may not participate in any discussion of, vote on, or discharge any function related to any matter in which you have a pecuniary interest as defined by regulations made by the Secretary of State.

14. Your participation in any item of business:

- a) in which you have any other interest; or
- b) that affects a donor from whom you have received any gift or hospitality;

that is registered, or ought to be registered as set out above, will need to be considered by you on a case by case basis. You will only be expected to exclude yourself from speaking or voting in exceptional circumstances, for example where there is a real danger of bias.

15. If in doubt about any of the above matters you are encouraged to seek advice from the Town Clerk or the Corporation's Monitoring Officer.

Definition of Bullying

Bullying may be characterised as: offensive, intimidating, malicious or insulting behaviour; or an abuse or misuse of power in a way that intends to undermine, humiliate, criticise unfairly or injure someone.

Definition of Harassment

Harassment may be characterised as unwanted conduct which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for an individual.

IHRA Definition of Antisemitism

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

IHRA Working Examples

Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for “why things go wrong.” It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
- Applying double standards by requiring of it a behaviour not expected or demanded of any other democratic nation.

- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.

Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

Criminal acts are antisemitic when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries.

STATUTORY INSTRUMENTS

2012 No. 1464

LOCAL GOVERNMENT, ENGLAND

**The Relevant Authorities (Disclosable Pecuniary Interests)
Regulations 2012**

<i>Made</i> - - - -	<i>6th June 2012</i>
<i>Laid before Parliament</i>	<i>8th June 2012</i>
<i>Coming into force</i> - -	<i>1st July 2012</i>

The Secretary of State, in exercise of the powers conferred by sections 30(3) and 235(2) of the Localism Act 2011⁽³⁾, makes the following Regulations.

Citation, commencement and interpretation

1.—(1) These Regulations may be cited as the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 and shall come into force on 1st July 2012.

(2) In these regulations—

“the Act” means the Localism Act 2011;

“body in which the relevant person has a beneficial interest” means a firm in which the relevant person is a partner or a body corporate of which the relevant person is a director, or in the securities of which the relevant person has a beneficial interest;

“director” includes a member of the committee of management of [a registered society within the meaning given by section 1(1) of the Co-operative and Community Benefit Societies Act 2014, other than a society registered as a credit union];

“land” excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income;

“M” means a member of a relevant authority;

“member” includes a co-opted member;

“relevant authority” means the authority of which M is a member;

“relevant period” means the period of 12 months ending with the day on which M gives a notification for the purposes of section 30(1) or section 31(7), as the case may be, of the Act;

“relevant person” means M or any other person referred to in section 30(3)(b) of the Act;

“securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000⁽⁴⁾ and other securities of any description, other than money deposited with a building society.

Specified pecuniary interests

2. The pecuniary interests which are specified for the purposes of Chapter 7 of Part 1 of the Act are the interests specified in the second column of the Schedule to these Regulations.

Signed by authority of the Secretary of State for Communities and Local Government

Grant Shapps
Minister of State

6th June 2012

Department for Communities and Local Government

⁽³⁾ 2011 c.20.

⁽⁴⁾ 2000 c. 8.

SCHEDULE

Regulation 2

<i>Subject</i>	<i>Prescribed description</i>
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by M in carrying out duties as a member, or towards the election expenses of M.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992⁽⁵⁾.</p>
Contracts	<p>Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority—</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	<p>Any tenancy where (to M's knowledge)—</p> <p>(a) the landlord is the relevant authority; and</p> <p>(b) the tenant is a body in which the relevant person has a beneficial interest.</p>
Securities	<p>Any beneficial interest in securities of a body where—</p> <p>(a) that body (to M's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>

⁽⁵⁾ 1992 c. 52.

EXPLANATORY NOTE

(This note is not part of the Regulations)

Section 30 of the Localism Act 2011 provides that a member or co-opted member of a relevant authority as defined in section 27(6) of the Localism Act 2011, on taking office and in the circumstances set out in section 31, must notify the authority's monitoring officer of any disclosable pecuniary interest which that person has at the time of notification. These Regulations specify what is a pecuniary interest. Section 30(3) of the Act sets out the circumstances in which such an interest is a disclosable interest.

A full impact assessment has not been produced for these Regulations as no impact on the private or voluntary sectors is foreseen.

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Approved by the Court of Common Council on 7 September 2023.



**HOW COMPLAINTS SUBMITTED TO
THE CITY OF LONDON
CORPORATION RELATING TO THE
MEMBER CODE OF CONDUCT WILL
BE DEALT WITH**

INTRODUCTION

1. The Localism Act 2011 requires the City of London Corporation (“the Corporation”) 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 elected members and co-opted members.
2. The Localism Act 2011 only applies to the Corporation in its capacity as a local authority or police authority. The Corporation has, however, chosen to apply the member code of conduct and these arrangements to all of its functions.

MEMBER AGAINST MEMBER COMPLAINTS – PRE-COMPLAINT PROTOCOL

3. Where an elected member wishes to make a complaint against another elected member, there is a strong expectation that they should first seek a resolution to their concern in accordance with the separate pre-complaint protocol. If the concern relates to the conduct of an Alderman, assistance should be sought from the chair of the General Purposes Committee of Aldermen or the chair of the Nominations Committee of Aldermen (“the Aldermanic chairs”). If the concern relates to the conduct of a Common Councillor, assistance should be sought from the Chief Commoner who may, where appropriate, nominate a member who formerly held that office to deal with the matter.

THE PANEL OF INDEPENDENT PERSONS

4. The Corporation must appoint at least one Independent Person under the Localism Act 2011 whose views:
 - (i) must be sought, and taken into account, by the Corporation before it makes its decision on an allegation that it has decided to investigate;
 - (ii) may be sought by the Corporation in relation to an allegation in other circumstances;
 - (iii) may be sought by a member against whom an allegation has been made (“the subject member”).
5. The Corporation has decided to appoint a panel of Independent Persons (“the Independent Panel”) and to give them an enhanced and expanded role in overseeing the complaints process. Whilst the Independent Persons cannot be formal decision-makers under the relevant legislation, the Town Clerk and the Monitoring Officer have delegated authority to implement certain recommendations of the Independent Panel, where indicated in this procedure. If they disagree with a recommendation of the Independent Panel then they must refer the matter to the Court of Common Council. Any recommendation following a hearing and any appeal, that concerns a breach of the code of conduct and an appropriate sanction, will automatically be referred to the Court of Common Council for decision, as set out in this procedure. All of the Independent Persons will be of equal stature but they will select a chair from time to time to liaise on

their behalf with the Corporation. The Independent Panel will provide an annual report to the Court of Common Council on all of the complaints that it has considered during the year.

SUB-PANELS

6. In the interests of fairness and efficiency, the Independent Panel will operate through a different sub-panel for each stage of the process as follows:
 - (i) Assessment Panel;
 - (ii) Hearing Panel;
 - (iii) Appeal Panel.
7. Each sub-panel will consist of three Independent Persons, appointed by the Town Clerk in consultation with the Independent Panel. They may meet physically or virtually, or in a hybrid fashion. Each sub-panel will elect a chair and make recommendations based on a simple majority vote. No Independent Person may sit on more than one sub-panel in relation to the same complaint. Each sub-panel will receive administrative support from the Town Clerk and legal advice from the Monitoring Officer.
8. In addition, the Appeal Panel will be assisted by an elected member, appointed by the Town Clerk, to advise on contextual matters. The appointment will be made in consultation with the chair of the Independent Panel, the Chief Commoner and the chair of the Civic Affairs Sub-Committee.

PUBLIC ACCESS TO MEETINGS AND PAPERS

9. Meetings of the sub-panels will apply the same provisions regarding public access to meetings as the Corporation's local authority committees. Under section 100A of the Local Government Act 1972, meetings shall be open to the public except to the extent that they are excluded. The public may be excluded from a meeting during an item of business whenever it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during that item there would be disclosure to them of exempt information. For more information on exempt information see Appendix 1. In such cases, any member may also be excluded from the meeting in accordance with Standing Orders.
10. Meetings of the sub-panels will also be treated as subject to the same provisions regarding public inspection of agendas, reports, background papers and minutes as the Corporation's committees, under sections 100B-100D of the Local Government Act 1972. However, the Corporation is not required to disclose to the public any document or part of a document that contains exempt information.

SUBJECT MEMBER CONSULTING WITH INDEPENDENT PERSON

11. A subject member is entitled to consult confidentially with an Independent Person at any stage in the complaints process. The Town Clerk will appoint one of the Independent Persons for this purpose on request, in consultation with the chair of the Independent Panel. This will be an Independent Person who has not been and will not be involved in the determination of the complaint, at any stage, and they will be available to support the subject member throughout the complaints process.

CONFLICTS OF INTEREST

12. It is envisaged that the enhanced use of the Independent Panel will limit the possibility for conflicts of interest to arise. No individual (whether an Independent Person, elected member or officer) shall participate in the consideration of a complaint where there is a real or perceived risk of bias, or if they have, or might be reasonably perceived to have, a conflict of interest. This will include declared interests, personal involvement or the involvement of a family member or close associate. A conflict would not normally arise from mere acquaintance, or the sort of relationship that usually exists between members and/or officers of the Corporation.

COMPLAINTS

13. This complaints procedure is publicised on the complaints and corporate governance pages of the Corporation website and explains where code of conduct complaints should be sent. A copy of the complaint form can be accessed via the Corporation's website or can be requested from the Principal Committee & Member Services Manager, Town Clerk's Office (telephone 020 7332 1409). Formal complaints must be submitted in writing although this includes fax and electronic submissions. Help is available from the Town Clerk for people who might be disadvantaged by this requirement.
14. The form covers the following matters:-
 - (i) Complainant's name, address and contact details;
 - (ii) Complainant's status i.e. fellow member, member of the public or officer;
 - (iii) Where the complainant is an elected member seeking to complain about another elected member, confirmation that they have complied with the pre-complaint protocol, or the reasons why not;
 - (iv) Who the complaint is about;
 - (v) Whether the complainant would be prepared to consider informal resolution;
 - (vi) Details of the alleged misconduct including, where possible, the paragraphs of the code of conduct that have been breached, dates, witness details and other supporting information;

- (vii) A warning that the complainant's identity and a copy of the complaint will normally be disclosed to the subject member, unless there are exceptional circumstances.
15. A complainant may, at any stage, withdraw their complaint with the consent of the Monitoring Officer, acting in consultation with the relevant sub-panel. Consent will only be withheld where there is a genuine public interest in continuing to consider the complaint in accordance with this procedure.

CONFIDENTIALITY

16. Members who are complained about generally have a right to know who the complainant is and to be provided with a copy of the complaint. A complainant's identity or any details of their complaint are unlikely to be withheld unless there are exceptional circumstances, for example if the complainant has reasonable grounds for believing that they will be at risk of physical or other harm or detriment if their identity is disclosed. If the nature of the allegations warrant it, then anonymous complaints may also be considered in exceptional circumstances.
17. Requests for confidentiality or for suppression of complaint details should be included in the complaint form. The Assessment Panel will consider the request as a preliminary matter. Where it is not appropriate to give the subject member a full copy of the complaint, the Assessment Panel will consider whether it is possible to give them a summary or a redacted version of the complaint.
18. The Town Clerk will confirm any decision regarding confidentiality to the complainant. If the request for confidentiality is not granted, the complainant will usually be allowed the option of withdrawing their complaint. However, it is important that in certain exceptional circumstances, where the matter complained about is very serious, the Corporation can proceed with an investigation or other action and disclose a complainant's name even if they have expressly asked us not to. It may also be necessary in those circumstances to make a referral to another agency.
19. Where there is a reasonable suspicion that informing the subject member of a complaint may lead to an attempt to interfere with evidence or intimidate witnesses, the Town Clerk may defer notification to enable a proper investigation to take place.
20. Where issues around confidentiality do arise, the procedures as set out in this document shall be modified accordingly.

ACTION FOLLOWING RECEIPT OF A COMPLAINT – ELECTED MEMBERS ONLY

21. Where an elected member wishes to complain about another elected member and has indicated on their complaint form that they have complied with the pre-complaint protocol, the Monitoring Officer will seek confirmation in writing from the Chief Commoner, or the Aldermanic chairs as appropriate, that they have been contacted by the complainant and that efforts to resolve the concern have been

unsuccessful. No further action will be taken in relation to the complaint and the time limits set out in the following provisions of this complaints procedure will not begin to run until confirmation has been received.

22. Where an elected member wishes to complain about another elected member and has indicated on their complaint form that they have not complied with the pre-complaint protocol, the Assessment Panel will consider any explanation for this that has been included on the complaint form as a preliminary matter. The Assessment Panel will only proceed to assess the complaint in accordance with the following provisions of this complaints procedure where there are exceptional circumstances to justify this course of action.

ACTION FOLLOWING RECEIPT OF A COMPLAINT – ALL COMPLAINTS

23. The Monitoring Officer will acknowledge receipt of a complaint within 10 working days. They may ask the complainant for clarification of their complaint if they are unable to understand the document submitted. They may also obtain further information to assist the Assessment Panel. This might include: copies 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; and any other relevant and readily obtainable documents.
24. Subject to any issues of confidentiality, the Monitoring Officer will also provide the subject member with a copy of the complaint within the same timescale. The letter to the subject member will make it clear that they may seek the views of an Independent Person, should they so wish.

INFORMAL RESOLUTION

25. Where practical and reasonable the Corporation would like to focus on conflict resolution with the aim of achieving outcomes that are fair, just, inclusive and sustainable. Informal resolution is an opportunity for all parties to secure an outcome to a concern or complaint relating to the code of conduct through open and constructive dialogue, supported by an independent third party (not a member or employee of the Corporation, or one of the Independent Persons). This could include: facilitated conversation; coaching, mentoring or training; mediation; team facilitation or team building.
26. All parties concerned must consent, in order for an informal resolution process to be initiated – if any party objects, this process cannot proceed, in the interests of natural justice and fairness. If the complainant has indicated on their form that they would be prepared to consider informal resolution, the Monitoring Officer will, when writing to the subject member about the complaint, ask them to confirm within 10 working days whether they are also willing to enter into such a process.
27. Whilst the views of the parties will normally be decisive, the Town Clerk, acting in consultation with the chair of the Independent Panel, must also agree that a complaint is suitable for informal resolution, in order for this process to proceed. The factors to be taken into consideration are:

- (i) The severity of the alleged conduct and the complexity of the complaint;
 - (ii) Any previous attempts to resolve the situation;
 - (iii) Any stated needs of the parties e.g. in terms of reasonable adjustments;
 - (iv) Any risk to the Corporation's reputation if the matter is dealt with informally;
 - (v) Any risk to the welfare of the individuals involved.
28. The Town Clerk and the Monitoring Officer may liaise with the parties to establish the most appropriate type of informal resolution process in any particular case. The Town Clerk will then make the necessary arrangements in consultation with the chair of the Independent Panel.
29. If at any time during the process, or within 10 working days of its conclusion, any party feels that the informal resolution route has been unsuccessful, they may ask for the formal complaints procedure to be resumed by making a request in writing to the Monitoring Officer.
30. Where the formal complaints procedure is to be resumed, or where one or more of the parties have indicated from the outset that they are not willing to consider informal resolution, the Monitoring Officer will invite the subject member to provide any written response to the complaint within 10 working days. The complaint and any response will then be referred to the Assessment Panel for initial assessment.

INITIAL ASSESSMENT OF COMPLAINTS

31. The Town Clerk will aim to convene the Assessment Panel for the initial assessment of a complaint within 30 working days of the referral from the Monitoring Officer.

ADMISSIBILITY OF COMPLAINTS – CAN ACTION BE TAKEN?

32. The Assessment Panel will firstly satisfy itself that the complaint meets the following tests:-
- (i) It is a complaint against one or more named members of the Corporation;
 - (ii) The named member was in office at the time of the alleged conduct and the code of conduct was in force at the time;
 - (iii) 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;
 - (iv) The complaint is about something that happened or came to light within the last three months, or is connected to alleged misconduct within the last three months, unless there are reasonable grounds for the complaint not having been made within that time period.

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

ASSESSMENT CRITERIA – SHOULD ACTION BE TAKEN?

34. The Assessment Panel will then consider the following criteria when assessing admissible complaints and deciding what action, if any, should be taken:-

- (i) Has the complainant submitted enough information to satisfy the Assessment Panel that the complaint should be referred for investigation?
- (ii) Is the complaint insufficiently serious to warrant further action – i.e. is it too minor a matter to warrant further investigation?
- (iii) Does the complaint appear to be either malicious, politically motivated or vexatious? The Assessment Panel will consider whether the allegation is genuine and serious despite the motivation, or whether in fact it is reasonable to assume that it is not the expression in good faith of a genuine concern.
- (iv) 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? If so, what was the outcome of these processes and is the consideration of a new complaint appropriate?
- (v) Might the complaint still be suitable for informal resolution or mediation?

35. These assessment criteria are intended to ensure that complaints are taken seriously and dealt with appropriately, whilst acknowledging that a decision to investigate a complaint or to take other action will expend public resources – an important consideration where the matter is relatively minor.

INITIAL ASSESSMENT DECISION

36. Once the Assessment Panel has applied the assessment criteria it will then do one of the following:-

- (i) recommend that no action should be taken in respect of the complaint; or
- (ii) recommend training, conciliation, mediation or other appropriate alternative action (which, if unsuccessful, does not preclude a subsequent hearing); or
- (iii) request a formal investigation of the complaint in preparation for a hearing; or
- (iv) refer the matter directly to the Hearing Panel, if all of the facts are known and an investigation would not assist in determining the complaint.

NOTIFICATION OF INITIAL ASSESSMENT DECISIONS

37. After the Assessment Panel has made its recommendation, the Town Clerk will write to the complainant and the subject member to confirm the decision and to advise them of the outcome within 10 working days. The decision notice will include the main points of the matter considered, the decision reached and the reasons for that decision.

ALTERNATIVE ACTION

38. If alternative action is proposed, the Town Clerk will additionally seek written confirmation from all involved parties that they consent and will co-operate with the process. In this case, the letter to the parties should outline what is being proposed, why it is being proposed, why they should consent and what it is hoped to achieve. The Town Clerk will then make the necessary arrangements in consultation with the Assessment Panel.

INVESTIGATIONS

39. Where the Assessment Panel has requested that an allegation should be formally investigated, the Monitoring Officer will appoint an investigator in consultation with the Assessment Panel. This may be an officer of the Corporation but will normally be an external investigator. The Monitoring Officer will write to the complainant and the subject member to advise them of the person who will be responsible for conducting the investigation.

INVESTIGATION PROCEDURE

40. Investigations will be conducted in accordance with the relevant protocol, which is included at Appendix 2. They will be conducted in a timely fashion and should normally be concluded within 30 working days. The investigator will produce a report for the Hearing Panel, stating whether there is evidence of a breach of the code of conduct. The report will include all of the relevant evidence that the investigator has relied upon in coming to this conclusion.

HEARINGS

41. The Town Clerk will aim to convene the Hearing Panel within 30 working days from receipt of the investigator's report, or within 30 working days of the referral from the Assessment Panel, if there is no investigation.

HEARING PROCEDURE

42. It is important to remember that the hearing is not being held in a courtroom setting. Whilst the complainant and the subject member may be legally represented and they, or their representatives, will normally be allowed to put questions to any witnesses, this is at all times subject to the chair's discretion to manage the hearing in an inquisitorial rather than an adversarial manner. A copy of the hearing procedure is included at Appendix 3.

FINDINGS

43. Following the hearing, the Hearing Panel will make a finding, on the balance of probabilities, whether the subject member has failed to comply with the code of conduct. If so, the Hearing Panel will also consider what sanctions, if any, ought to be imposed. This may be any one of or any combination of sanctions that are available. The Hearing Panel may additionally consider whether any formal announcement of its findings is called for, such as a statement on the Corporation's website.

SANCTIONS

44. Any sanctions imposed must be reasonable and proportionate in all of the circumstances. The available sanctions for a breach of the code of conduct are:-

- (i) censure;
- (ii) withdrawal of Corporation hospitality for an appropriate period;
- (iii) removal from one or more committees;
- (iv) other action.

CENSURE

45. Censure means a formal expression of severe disapproval, and is distinct from a simple finding that there has been a breach of the code of conduct.

WITHDRAWAL OF CORPORATION HOSPITALITY

46. Corporation hospitality includes committee lunches and dinners, drinks receptions, state banquets, etc. This sanction will normally only be considered where relevant to the nature of the complaint.

REMOVAL FROM COMMITTEE

47. The option of removal from a particular committee or committees includes sub-committees. This sanction will normally only be considered where relevant to the nature of the complaint.

OTHER ACTION

48. There is 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:-

- (i) that the member submits a written apology in a form specified;

- (ii) that the member undertakes specified training;
- (iii) that the member participates in such conciliation as is specified.

NOTIFICATION OF HEARING DECISIONS

- 49. After the Hearing Panel has made its recommendation, the Town Clerk will write to the complainant and the subject member to confirm the decision and to advise them of the outcome within 10 working days. The decision notice will include the main points of the matter considered, the decision reached and the reasons for that decision.
- 50. If the finding of the Hearing Panel is that there has been a breach of the code of conduct, this must be ratified by the Court of Common Council before it takes effect. Following the expiry of the appeal period, if no appeal is received, the Town Clerk will draft a report to the next meeting of the Court of Common Council for decision. The Town Clerk will provide a copy of the report to the parties and advise them of the outcome once the Court of Common Council has met.

APPEALS

- 51. It is possible for either the complainant or the subject member to appeal against the decision at the hearing stage. This may relate either to the finding regarding a breach of the code of conduct and/or in relation to any sanction imposed, but is limited only to: matters concerning new, or undisclosed, evidence; the failure to consider evidence that was available at the hearing stage; or failure to follow due process.
- 52. Written notice of intention to appeal must be received by the Monitoring Officer within 10 working days from the date that the parties received the decision notice. Full written details of the reasons for the appeal must then be received by the Monitoring Officer within a further 10 working days.

RESPONDING TO AN APPEAL

- 53. The Monitoring Officer will forward the full written details of any appeal to the respondent and invite them to submit their own written comments in response to the Appeal Panel. Any written response must be received by the Monitoring Officer within 10 working days from the date that the respondent received the full written details of the appeal.

APPEAL PROCEDURE

- 54. The Town Clerk will aim to convene the Appeal Panel within 30 working days from receipt of the full written details of the appeal. The Appeal Panel will consider the admissibility of the appeal as a preliminary matter. If it is not considered to satisfy the relevant criteria, then the appeal process comes to an end.

55. For admissible appeals, the Appeal Panel may adopt such procedure as it considers appropriate having regard to the nature of the case. The Appeal Panel will normally make its finding on any appeal on the papers and will not hold a completely new hearing of the whole matter. However, the Appeal Panel may decide to hear further oral evidence in a particular case if it deems this necessary. If the Appeal Panel does decide to hear further oral evidence then the procedure will as far as possible follow the hearing procedure included at Appendix 3, with any necessary modifications.

FINDINGS

56. Having due regard to the finding of the Hearing Panel, the Appeal Panel may substitute any alternative recommendation that it considers appropriate, providing it is a recommendation that the Hearing Panel had the power to make. There is no further right of appeal against a decision made following a recommendation of the Appeal Panel.

NOTIFICATION OF APPEAL DECISIONS

57. After the Appeal Panel has made its recommendation, the Town Clerk will write to the parties to confirm the decision and to advise them of the outcome within 10 working days. The decision notice will include the main points of the matter considered, the decision reached and the reasons for that decision.

58. If the finding of the Appeal Panel is that there has been a breach of the code of conduct, this must be ratified by the Court of Common Council before it takes effect. The Town Clerk will draft a report to the next meeting of the Court of Common Council for decision. The Town Clerk will provide a copy of the report to the parties and advise them of the outcome once the Court of Common Council has met.

EXEMPT (NON-PUBLIC) INFORMATION

THE DESCRIPTIONS OF EXEMPT INFORMATION

The descriptions of exempt information under Part VA and Schedule 12A to the Local Government Act 1972 are as follows:-

1. Information relating to any individual.
2. Information which is likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
6. Information which reveals that the authority proposes-
 - (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
 - (b) to make an order or direction under any enactment.
7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

Where, in the opinion of the proper officer, the consideration of a complaint at a meeting is likely not to be open to the public, in order to prevent the disclosure of exempt information, any related papers will be treated as non-public pending a formal decision on the matter. This is in accordance with section 100B(2) of the Local Government Act 1972 and so as to avoid pre-judging the matter.

THE PUBLIC INTEREST TEST

The types of information set out above are only exempt information if and so long as, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information. If the public interest is equal on both sides, then the information must be disclosed – in this sense there is an assumption in favour of disclosure.

The Corporation must consider the balance of the public interest in each individual case, and therefore it is not possible to have a blanket ruling as to whether information relating to a complaint will be exempt or not.

There is no statutory definition of what constitutes the 'public interest'. The public interest can cover a wide range of values and principles relating to the public good, or what is in the best interests of society, and there are often arguments to be made on both sides. A non-exhaustive list of relevant factors to be considered are set out below:-

GENERAL PUBLIC INTEREST IN TRANSPARENCY

There is a general public interest in promoting transparency, accountability, public understanding and involvement in the democratic process.

SPECIFIC PUBLIC INTEREST IN THE COMPLAINT

As well as the general public interest in transparency, which is always an argument for disclosure, there may also be a legitimate public interest in knowing the details of a particular complaint. For example, if the complaint relates to the misappropriation of public funds, or it is alleged that the subject member's conduct has impacted on public services.

DETERRENT EFFECT

If members know – because the Corporation's policy is to publish in an appropriate case – that improper conduct, if it comes to light, will be exposed to public scrutiny then this, in and of itself, can act as a deterrent to misconduct in the first place.

OF INTEREST TO THE PUBLIC

The public interest is not necessarily the same as what interests the public. The fact that a subject member's actions are being discussed, for example in the media, does not automatically mean that there is a public interest in disclosing the information.

THE VIEWS OF THE PARTIES

The public interest test is concerned only with public interests, not private interests. However, the complainant and the subject member may be invited to make representations regarding the public interest in a particular case. For example, if neither has any concerns about information relating to the complaint being disclosed then it is unlikely that the exemption would be maintained.

INFORMATION ALREADY IN THE PUBLIC DOMAIN

If a complaint relates to the conduct of the subject member at a public meeting, then it is unlikely to be treated as exempt because knowledge of the incident is already in the public domain. However if, for example, the conduct may have been caused by an underlying medical condition, then it is likely that this would be exempt information.

PRESENTING A 'FULL PICTURE'

Similarly, there may be cases where allegations have been thoroughly aired, for example in the press and on social media; the coverage may have been partisan and not always accurate. It may be in the public interest to make the full facts known to the public, rather than having snippets referred to and innuendos drawn from those snippets.

EVIDENCE OF WRONGDOING

It is not in the public interest for baseless accusations against members of the Corporation to be publicised. Therefore in order for information regarding a complaint to be disclosed, the suspicion of wrongdoing must normally amount to more than a mere allegation; there should be a plausible basis for the suspicion, even if it is not actually proven at that stage. It is not wrong or unfair in principle to publish allegations, as opposed to ultimate findings, but we will take into account the nature and depth of any investigations undertaken, and the strength of the case against the subject member.

Consequently, it is less likely that information regarding a complaint will be disclosed at the initial assessment stage, particularly where it has been decided that no action should be taken. It is more likely that information will be disclosed if a subsequent investigation reveals a serious case to answer. It is more likely still that information will be disclosed if, after full consideration of all of the evidence at a hearing, or after any appeal, a subject member is found to have breached the code of conduct and a sanction is imposed.

INVESTIGATIONS PROTOCOL

Meeting with complainant

The investigator will interview the complainant to explore the complaint and identify supporting evidence and/or witnesses.

Meeting with subject member

The investigator will interview the subject member to explore the complaint and identify supporting evidence and/or witnesses. The subject member shall have the right to be accompanied by a person of their choice. This may be a lawyer although the process will be an interview with the subject member rather than a hearing involving advocacy.

Interviewing witnesses

All requests for interviews will be made in writing and will include a summary of the matters that investigator wishes to ask the witness about.

Recording of interviews

All interviews will either be recorded, or a full written transcript taken, and the interviewee will be provided with a copy.

Preparation of statements

The investigator may assist the parties and witnesses in the preparation of statements if they so wish, or they may choose to prepare their own statements.

Confidentiality

All interview records, witness statements and other materials produced in the course of the investigation will only be used and disclosed in accordance with the procedures set out in this document.

Retention of records

All interview records, witness statements and other materials produced in the course of the investigation will be retained by the Monitoring Officer for six years following the determination of the complaint and then destroyed.

Provision of draft report

At least 10 working days prior to submitting a final report to the Hearing Panel on whether there is or is not evidence of a breach of the code of conduct the investigator will provide a copy of their draft report to the parties for comment. The draft report will include all of the material gathered during the investigation that the investigator is intending to present to the Hearing Panel.

HEARING PANEL – HEARING PROCEDURE

1. The Hearing Panel will open in public session. It is a matter for the Hearing Panel to determine whether it moves into confidential session with the press and public excluded, in accordance with the provisions of Part VA and Schedule 12A of the Local Government Act 1972. The views of the complainant and the subject member will be sought, if these have not already been received at any pre-hearing review.
2. The Chair introduces the members of the Hearing Panel and others present, and explains the purpose of the hearing, the procedure to be followed and the nature of the meeting.
3. The complainant and the subject member may be legally represented if they wish, or accompanied by some other person, but will be expected to give evidence and answer any questions put to them personally.
4. The complainant and the subject member (and anyone representing or accompanying them) are invited to be present throughout the hearing; other witnesses will enter to give evidence and then withdraw.
5. If there has been an investigation, the investigator presents their report and then answers any questions from the Hearing Panel, the complainant and the subject member (in that order).
6. The complainant and then the subject member will be invited to make an opening statement. The Chair has a discretion to limit the time for opening statements, in appropriate circumstances.
7. The Chair calls witnesses in the order agreed at any pre-hearing review, or otherwise in the order that their statements appear in the papers. The statements will be taken as read rather than read out. Witnesses will be asked to confirm that their statements are true.
8. Immediately after confirming the contents of their statement each witness will be invited to answer any questions from the Hearing Panel.
9. Each witness may then be invited to answer questions (if any) from the complainant and the subject member (in that order). Alternatively, questions may only be allowed to be put through the Chair, with their permission.
10. The Chair has a discretion to manage the hearing in a non-adversarial, fair and efficient manner and may therefore refuse to allow certain questions, or limit the time for questioning, in appropriate circumstances.
11. There will then be an opportunity for the complainant and the subject member (in that order) to make any closing comments if they so wish. Again, the Chair has a discretion to limit the time for closing comments, in appropriate circumstances.

12. All other persons present then withdraw to allow the Hearing Panel to consider the evidence and representations with their clerk and legal adviser and to take legal advice where necessary.
13. Those persons are then invited to return and the Hearing Panel announces its finding as to whether there has been a breach of the code of conduct.
14. If the Hearing Panel considers that there has been a breach of the code it may invite any representations from the complainant and the subject member (in that order) on the appropriate sanction (censure of the member; withdrawal of Corporation hospitality for an appropriate period; or removal of the member from a particular committee or committees). The Hearing Panel may ask all other persons present to withdraw again to allow it to consider the appropriate sanction, then invite them to return to hear the Hearing Panel's recommendation as to any appropriate sanction.
15. The Hearing Panel will endeavour to conclude the hearing in one day but, in exceptional circumstances, may at any stage adjourn the hearing to a different day. This may be necessary, for example, where one of the parties makes a request to introduce additional evidence at the hearing, and more time is needed to consider this. An adjournment may also be necessary where the Hearing Panel, having heard all of the evidence, requires more time to make a recommendation.
16. The final decision of the Town Clerk or the Court of Common Council, together with the reasons for that decision, will be confirmed to the parties in writing following the hearing.
17. This procedure may be varied by the Hearing Panel as it considers appropriate in order to dispose of the matter in a fair and efficient manner.

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