



Standards Committee

Date: FRIDAY, 4 OCTOBER 2019

Time: 11.00 am

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

Members: Ann Holmes (Chair)
Caroline Addy (Deputy Chairman)
Randall Anderson
Judith Barnes (Co-opted)
Henry Colthurst
Nick Cooke (Co-opted)
Mary Durcan
Deputy Jamie Ingham Clark
Alderswoman Susan Langley
Dan Large (Co-opted)
Vivienne Littlechild
Deputy Edward Lord
Alderman Professor Michael Mainelli
Barbara Newman
Jeremy Simons
Vacancy (Co-opted)

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gemma.stokley@cityoflondon.gov.uk

Lunch will be served in the Guildhall Club at 1pm
NB: Part of this meeting could be the subject of audio visual recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public 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 consider the public minutes of the meeting held on 3 May 2019.

For Decision
(Pages 1 - 16)

4. **MINUTES OF DISPENSATIONS SUB COMMITTEES**

To receive the minutes of Dispositions Sub (Standards) Committee meetings held on:

- a) 3 July 2019; and
- b) 4 September 2019

For Information
(Pages 17 - 28)

5. **REVIEW OF DISPENSATIONS POLICY**

Report of the Comptroller and City Solicitor.

For Decision
(Pages 29 - 34)

5.A. **CHAIR'S NOTE - DISPENSATIONS POLICY**

For Discussion
(Pages 35 - 36)

6. **INSURANCE AND INDEMNITIES FOR INDEPENDENT PERSONS**

Joint report of the Comptroller and City Solicitor and the Chamberlain.

For Decision
(Pages 37 - 40)

7. **ANNUAL UPDATE TO MEMBER DECLARATIONS**

Report of the Town Clerk.

For Discussion
(Pages 41 - 44)

8. **THE CITY OF LONDON CORPORATION'S INDEPENDENT SCHOOLS AND PARENT GOVERNORS**

Joint report of the Town Clerk and the Comptroller and City Solicitor, with an excerpt from the minutes of the Policy and Resources Committee meeting held on 4 July 2019.

For Information
(Pages 45 - 66)

9. **LORD MAYOR AND SHRIEVAL GIFTS AND HOSPITALITY**

Report of the Executive Director of Mansion House & Central Criminal Court.

For Information
(Pages 67 - 90)

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

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

12. **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 on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

13. **NON-PUBLIC MINUTES OF THE PREVIOUS MEETING**

To consider the non-public minutes of the meeting held on 3 May 2019.

For Decision
(Pages 91 - 92)

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

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

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STANDARDS COMMITTEE

Friday, 3 May 2019

Minutes of the meeting of the Standards Committee held at Committee Room - 2nd Floor West Wing, Guildhall on Friday, 3 May 2019 at 11.00 am

Present

Members:

Caroline Addy
Randall Anderson
Judith Barnes
Henry Colthurst
Cooke
Mary Durcan
Ann Holmes
Deputy Jamie Ingham Clark
Alderman Susan Langley
Dan Large
Vivienne Littlechild MBE
Deputy Edward Lord
Alderman Professor Michael Mainelli
Barbara Newman
Jeremy Simons

Officers:

Lorraine Brook	- Town Clerk's Department
Gemma Stokley	- Town Clerk's Department
Michael Cogher	- Comptroller and City Solicitor
Edward Wood	- Comptroller and City Solicitor's Department
Chandni Tanna	- Media Officer

1. APOLOGIES

There were no apologies for absence.

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

There were no declarations.

3. ORDER OF THE COURT OF COMMON COUNCIL

The Committee received the Order of the Court of Common Council of 25 April 2019 (separately circulated and tabled at the meeting) appointing the Committee and setting its terms of reference for the ensuing year.

RECEIVED.

4. ELECTION OF CHAIRMAN

The Committee proceeded to elect a Chairman in accordance with Standing Order No. 29.

A list of Members eligible to stand was read and, with both Ann Holmes and Barbara Newman expressing willingness to serve, a ballot was held.

Votes were cast as follows:	Ann Holmes	–	7 votes
	Barbara Newman	–	5 votes

Ann Holmes was therefore duly elected Chairman for the ensuing year and took the Chair. The Chairman thanked the Committee for their support.

VOTE OF THANKS

Proposed by Barbara Newman;
Seconded unanimously;

RESOLVED UNANIMOUSLY:

That the Members of the Standards Committee wish to place on record their sincere appreciation to

Oliver Arthur Wynlayne Lodge

for the courteous and conscientious manner in which he has carried out the duties of Chairman of this Committee since May 2016 and the leadership he has shown in steering it through a significant period of change over the past three years.

SOON after his appointment as Chairman, the decision to commission an independent review of the City Corporation's standards framework was taken in an attempt to re-establish the standing of the Standards Committee in the Court. This review resulted in a number of recommendations with those that were carried altering the composition of the Committee, the role of its Independent Persons and the way in which it handles complaints. A revised Code of Conduct and Guidance to Members came into effect in March 2018.

MORE recently, Mr Lodge oversaw a revision to the organisation's Dispensations Policy and Guidance, with a view to providing an enhanced level of consistency, of requisite information about disclosable pecuniary interests and of the regulations around such interests and dispensations. The new requirements came into effect as of 1st March 2019.

THE Committee also examined how best to promote greater transparency and consistency in terms of both elected and Co-opted Members' Declarations of Interest. Through the Chairman's persistence in this matter, the declarations of all necessary Co-opted Members are now published on the City Corporation's webpages alongside those of Elected Members and have been publicly available since March 2019.

IN taking their leave of their Chairman, his colleagues are united in conveying to Oliver Lodge their thanks for the contribution he has made to their deliberations and wish him every possible success in the future.

FURTHER RESOLVED: That the Town Clerk be authorised to make arrangements for the resolution to be presented in a manner agreeable to the past Chairman.

5. **ELECTION OF DEPUTY CHAIRMAN**

The Committee proceeded to elect a Deputy Chairman in accordance with Standing Order No. 30.

A list of Members eligible to stand was read and, with Caroline Addy, Mary Durcan and Barbara Newman expressing willingness to serve, a ballot was held.

Votes were cast as follows:	Caroline Addy	–	8 votes
	Mary Durcan	–	3 votes
	Barbara Newman	–	1 vote

Caroline Addy was therefore duly elected Deputy Chairman for the ensuing year and took the Chair.

The Chairman took the opportunity to give thanks to those other Members who had now left the Committee – Christopher Boden, Deputy Kevin Everett, Alderman David Graves, Mark Greenburgh, Michael Hudson and Oliver Sells, QC. She went on to welcome those Members who were newly appointed to the Committee – Randall Anderson, Henry Colthurst, Nicholas Cooke, QC, Mary Durcan, Alderman Susan Langley, Vivienne Littlechild and Barbara Newman.

6. **MINUTES OF THE PREVIOUS MEETING**

The public minutes of the meeting held on 25 January 2019 were considered and approved as a correct record.

MATTERS ARISING

Election of Deputy Chairman of Dispensations Sub Committee (page 11) – The Town Clerk reported that, following the resignation of Mark Greenburgh, there was a vacancy for one of the two Deputy Chairmen of the Dispensations Sub Committee. The Town Clerk reported that expressions of interest had been received from both Henry Colthurst and Randall Anderson to fill the position and that a ballot was therefore necessary.

Randall Anderson indicated that he wished to withdraw at this stage. Henry Colthurst was therefore appointed as one of the two Deputy Chairmen of the Dispensations Sub Committee for the ensuing year.

RESOLVED – That, being the only Member expressing a willingness to serve, Henry Colthurst be appointed as one of the two Deputy Chairmen of the Dispensations Sub Committee for the ensuing year.

7. MINUTES OF HEARING SUB (STANDARDS) AND DISPENSATIONS SUB COMMITTEES

The public minutes of the Hearing Sub (Standards) Committee meeting held on 1 March 2019 and the public minutes of the Dispensations Sub (Standards) Committee meetings held on 1 February 2019 and 1 April 2019 were received.

The Chairman clarified that a further Hearing date relating to the case covered at the 1 March 2019 meeting of the Hearing Sub Committee was still to be confirmed. She added that a new member of the Panel would also need to be established as one of the Members who had previously been involved had not been returned to the Standards Committee.

The Town Clerk confirmed that Members would be contacted regarding availability for a future Hearing in due course.

8. OUTSTANDING ACTIONS

The Committee received a report of the Town Clerk setting out updates on a number of outstanding actions.

Code of Conduct

A Co-opted Member reported that they had consulted the website earlier this morning and had searched 'complaints'. She expressed concern that information around how to make a complaint about a Member was not easily accessible and highlighted the need for this to be more clearly signposted in future.

Other Members agreed with this point and highlighted that the relevant complaint form was not only difficult to locate on the website but was also not user friendly. It was currently a PDF form located in the midst of another document. Members requested that users be able to download the form as a Word document going forward.

A Member referred to the wider corporate project currently being undertaken to replace the public website and suggested that these points be fed into the work around this.

The Chairman stated that she had stressed the importance of ease of access to these documents on many occasions and asked that this now be taken forward as a priority.

Annual reminder to Members on updating registered interests

A Member suggested that any communications sent to Members around this should be clearly worded with all Members seriously encouraged to update their registers in a timely manner.

A Member questioned whether this exercise could be undertaken in conjunction with the Chamberlain's related party transactions exercise in future years. The Town Clerk reported that the annual update to Members' registered interests was undertaken as part of the new municipal year whilst the related party

transactions exercise was aligned with the end of the financial year. For this reason, the two needed to remain as separate processes.

RECEIVED.

9. DRAFT ANNUAL REPORT OF THE STANDARDS COMMITTEE

The Committee considered a report of the Town Clerk setting out its Draft Annual Report for onward submission to the Court of Common Council.

A Member referred to the strong views expressed by the wider Court of Common Council around the work of the Standards Committee as well as its constitution and the tenure of some of those appointed. He questioned whether this needed to be reflected in some way within the report or its submission delayed.

Another Member stated that he felt that this was unnecessary and emphasised that the report was intended as an update on the work of the Committee over the past 12 months. He recognised that the Committee were continuing to address a number of issues but was of the view that this should not allowed to hold up the submission of the annual report in any way given that the Committee were obliged to produce this each year.

A Member accepted that the report should be submitted to the Court of Common Council in July 2019 as was customary but underlined the need to add some text to recognise the issues that had been raised by the Court and the work being undertaken to address these. Members were supportive of this approach and the inclusion of a paragraph to recognise that there continued to be a degree of dispute on a number of matters that would inform the work of the Committee going forward and around which there were ongoing discussions.

The Town Clerk clarified that the annual report was intended to be backwards looking and suggested that any ongoing discussions/work around the issues raised by the Court of Common Council in recent months could be highlighted by the Chairman orally in her introduction to provide Members with the necessary assurances. The Co-opted Members were supportive of this approach.

After much debate, the Committee were of the view that it would be preferable to include a reference to the fact some issues in the report were ongoing. Two Co-opted Members wished for it to be noted that they disagreed with this approach.

The Committee were content to delegate the final wording to the Town Clerk in consultation with the Chairman and Deputy Chairman.

A Co-opted Member noted that, in accordance with the report from the Committee on Standards in Public Life to be considered later on the agenda, future annual reports would need to provide more detail on code of conduct complaints going forward.

RESOLVED – That, the Committee:-

- (a) Delegate to the Town Clerk, in consultation with the Chairman and Deputy Chairman, the inclusion of some additional wording within the written report to reflect that ongoing discussions regarding the Committee's work continue;
- (b) Subject to the addition of this wording, approve the contents of the annual report;
- (c) In accordance with the Committee's terms of reference, refer the annual report to the Court of Common Council for information.

10. REVIEW OF LOCAL GOVERNMENT ETHICAL STANDARDS BY THE COMMITTEE ON STANDARDS IN PUBLIC LIFE

The Committee considered a report of the Comptroller and City Solicitor requiring Members to review how well the City Corporation's current arrangements match the recommendations of the Committee on Standards in Public Life around the promotion and maintenance of high standards of conduct by public office holders in local government and to consider any changes to existing processes that may be desirable.

The Chairman stated that the Committee would consider a future report on this containing more detailed recommendations and specific proposals once the Government's response to a number of the points raised had been received and any required legislative changes were implemented. There were, however, some recommendations that could be adopted by individual local authorities sooner. The Committee were asked to highlight areas of interest and particular recommendations that they would like to see brought back for further consideration.

The Comptroller signposted the report from the Committee on Standards in Public Life (CSPL) as the most significant national event regarding Standards since the introduction of the Localism Act 2011. He went on to highlight that many local authorities appeared to be grappling with similar issues to the City Corporation around matters such as disclosable pecuniary interests and Section 31 of the Localism Act. He was of the view that the recommendations within the report were likely to occupy the Standards Committee's work for the municipal year ahead. He urged Members to take the time to read the appended report in its entirety.

The Comptroller and City Solicitor acknowledged that whilst many of the CSPL's recommendations, summarised at appendix 2, were for Government consideration, there were also some matters that the City Corporation might want to take a view on. There were also a number of potential 'quick wins' which could be implemented immediately if Members so wished, such as offering legal indemnity to Independent Persons – something that had recently been provided to the individuals sitting on the City Corporation's Local Government Pensions Board.

Appendix 3 listed a number of best practice recommendations with those applicable to the City Corporation indicated alongside commentary highlighting where the organisation was 'ahead of the curve' on a number of these matters.

The Committee went on to discuss each of the recommendations detailed in Appendices 2 and 3 in turn:

Appendix 2

Rec 1 – It was noted that this recommendation was for the LGA to consider. The Comptroller and City Solicitor clarified that there had been no indication as to the LGA's/Government's response to any of the recommendations proposed to date. Once those responses were known, they would be reported back to Committee.

Rec 2 – Members indicated that they would like to consider the requirements around publishing a home address in an authority's register of interests in more detail.

A Member commented that there were security reasons for some resident Members not wishing to do this. The Comptroller and City Solicitor confirmed that there were provisions in place for an address to be left off of the public register where this could lead to violence or intimidation. He agreed to bring a report back on this issue.

Rec 3 – A Member commented that many elected and Co-opted Members represented a number of different bodies and that this recommendation could create difficulties. He stressed that this would therefore need to be addressed carefully.

The Deputy Chairman underlined that if this recommendation was subsequently adopted by Government this would require the issuing of updated guidance to Members. She questioned whether the proposed presumption that a Member was acting in an official capacity should apply in all circumstances.

The Committee requested that this recommendation and the potential issues around it should feature in a further report of the Comptroller and City Solicitor to the next meeting of the Standards Committee. A Co-opted Member asked that this also have regard to the letter sent regarding social media use at the conclusion of a Complaints Hearing heard by the Hearing Sub (Standards) Committee last year.

Rec 4 – The Committee were of the view that this recommendation was less controversial but again requested that the potential issues feature in a further report.

Rec 5 – It was noted that the City Corporation had already implemented this.

Rec 6 – It was noted that the City Corporation already required any gift or hospitality with a value of £100 or more or totalling £200 or more over a year

from a single source, to be registered. The Comptroller and City Solicitor highlighted that Members may, however, wish to consider whether they wanted to change the limits in line with the CSPL recommendation.

Rec 7 – It was noted that the CSPL's suggested test was consistent with this Committee's published guidance on making sense of the current provision.

Rec 8 – It was noted that this matter had been raised by the Committee previously with a view to introducing a defined term of office for the City Corporation's Independent Persons. A Member voiced the view that he, personally, felt that the recommendation of a fixed term of two year, renewable once, was too short.

The Committee requested a future report outlining the pros and cons of introducing fixed terms of different lengths. Members also requested that the report outline how engaged the Independent Persons were, how they were kept informed and what their views were since the Standards Regime Review had recommended that they no longer regularly attend Standards Committee meetings. The Chairman assured Members that the Independent Persons continued to receive all Committee agendas, partake in Complaints Hearings and were also invited to meet with the Chairman, Deputy Chairman and the Comptroller for six monthly meetings at Guildhall which they found extremely useful.

Rec 9 – The Comptroller and City Solicitor underlined that it was a statutory duty to consult an Independent Person but that there was currently no guidance as to how this should be done. He added that, at the City Corporation, Independent Persons were invited to personally attend Hearings. This meant that their views were already captured in the minutes. However, he agreed to bring a report back on this issue.

Rec 10 – It was noted that this would require a change to primary legislation.

Rec 11 – Members agreed with this recommendation and requested that a report be brought back to this Committee and the Finance Committee regarding the provision of legal indemnities to the Independent Persons for onward approval by the Court of Common Council.

A Member noted that the Independent Persons role had been expanded beyond the Standards Regime and also encompassed involvement in disciplinary procedures against the organisation's statutory officers. He added that the Establishment Committee would also therefore have an interest in this matter as well as on the term of office and method of appointment for this position going forward.

Rec 12 – It was noted that this would require a change to primary legislation.

Rec 13 – It was noted that this would require a change to primary legislation.

Rec 14 – It was noted that this would require a change to primary legislation.

Rec 15 – The Committee noted that most of the information recommended for publication was already provided in the annual report. They agreed, in principle, that information about the general nature of the complaints received should be provided in future annual reports.

Members requested a future report looking at this recommendation in more detail before any changes were made to the format of the Committee's annual report.

Rec 16 – It was recognised that introducing a power of suspension would require a change to primary legislation. However, it was requested that this issue and any subsequent developments be revisited in a future report. It was noted that, at present, the removal of allowances would not be an option for City Corporation Members. Removal from certain Committees and removal of hospitality could, however, already be recommended in appropriate circumstances if a Member was found to be in breach of the Code of Conduct.

Rec 17 – The Committee noted that this recommendation was for the Government to implement.

Rec 18 – Members were in agreement with this recommendation but noted that it would require a change to primary legislation.

Rec 19 – It was noted that this was not applicable to the City Corporation.

Rec 20 – It was noted that this was not applicable to the City Corporation.

Rec 21 – It was noted that this was not applicable to the City Corporation.

Rec 22 – The Committee indicated that they would like further information around this recommendation.

Rec 23 – The Committee were in favour of adding a named contact for the external auditor and asked that a recommendation be made to the Audit and Risk Management Committee and Establishment Committee along these lines.

Rec 24 – The Comptroller and City Solicitor explained that this matter related to the so-called 'Whistleblowing' legislation and that any amendment would require Government support. Members requested that Officers report back on this matter in due course but felt that the recommendation was a good one.

The Comptroller and City Solicitor added that any change to the statutory position would require a future revision to the organisation's Employee Code of Conduct which, at present, stipulated that staff were not able to lobby Members on employment matters and there could potentially be some crossover here. A Member agreed that this would be sensible and suggested that the Employee Code of Conduct might be updated in those circumstances to suggest that staff should not lobby Members on employment matters unless under the Public Interest Disclosure Act 1998. Another suggestion was that the Government

might want to restrict the number of Members who could be lobbied on employment matters (for example, in the case of the City Corporation, Establishment Committee members only).

Members suggested that any future report around this recommendation be submitted to both this Committee, the Establishment Committee and the Audit and Risk Management Committee.

Rec 25 – It was noted that, should compulsory Member training effectively be introduced nationally through political parties, the City Corporation would be out of kilter. The Comptroller and City Solicitor added that there were, however, alternative mechanisms that might be introduced by the City Corporation in those circumstances such as not allowing a Member to join certain Committee's without first undertaking appropriate training.

Rec 26 – It was noted that this matter was for the LGA.

In summarising, a Member stated that she would strongly advise that the City Corporation adopt the approach of 'comply or explain' in relation to all of the recommendations set out and that, where applicable, these should be adhered to unless there was good reason not to.

Appendix 3

BP1 – Members were of the view that a definition of bullying and harassment and examples around the sorts of behaviour that would be caught should be adopted and that a report should be brought back on this matter.

BP2 – Members considered that this point was already sufficiently covered.

BP3 – It was noted that the Member Code of Conduct had recently been reviewed. Members were of the view that an annual review was too frequent but were content to receive a further report as to how the Code might be reviewed more regularly, on a suitable timescale – possibly every three years - going forward.

BP4 – Members re-emphasised the need to feed into the corporate website review with regard to the accessibility and visibility of the Code of Conduct.

BP5 – It was noted that the City Corporation was already acting in line with best practice.

BP6 – It was noted that the City Corporation was already acting in line with best practice. However, Members requested that the current wording should be reviewed through a further report.

BP7 – It was noted that the City Corporation was already acting in line with best practice.

BP8 – It was noted that the City Corporation was already acting in line with best practice.

BP9 – The Committee requested that more detail be provided on this matter in the form of a future report.

BP10 - Members re-emphasised the need to feed into the corporate website review with regard to the accessibility and visibility of the Complaints Procedure.

BP11 – It was noted that this recommendation was not applicable to the City Corporation. It was, however, suggested that some clarification around ‘self-referral’ of complaints might be useful in a future report.

BP12 – It was noted that this recommendation was not applicable to the City Corporation.

BP13 – It was noted that the Complaints Procedure already addressed conflicts of interest, including those affecting the Monitoring Officer. In such cases, colleagues or those external to the organisation would be asked to undertake the investigation. It was suggested that future consideration could be given to utilising other local authority Monitoring Officers, with each case looked at on its merits.

The Deputy Chairman stated that she was of the view that it paid to be robust in terms of conflicts of interest which could be difficult to manage in practice. She noted, however, that the City Corporation did already have mechanisms in place whereby such conflicts were managed which seemed to work sufficiently well. The Chairman agreed but asked that Officers look to spell out the pros and cons in using other Local Authority Monitoring Officers in a future report.

Members were also of the view that the terms of reference for any external investigation needed to be clear from the outset and adhered to.

RESOLVED –

- (i) That Members note the Review of Local Government Ethical Standards by the Committee on Standards in Public Life at Appendix 1;
- (ii) After reviewing the Recommendations at Appendix 2, Members support steps being taken around the implementation of Recommendations 9, 11 and 23. Members requested further detailed reports in relation to Recommendations 2-4, 6, 8, 15, 16, 22 and 24 going forward;
- (iii) After reviewing the Best Practice Recommendations at Appendix 3, Members requested further reports in relation to Recommendations 1, 3, 6, 9, 11 and 13 going forward.

11. CO-OPTED MEMBER VACANCY

The Committee received a report of the Town Clerk requesting that Members note the vacancy that now exists for a Co-opted Member of the Standards Committee following the recent resignation of Mark Greenburgh and to determine what action, if any, to take at this stage in terms of re-appointing to this vacancy.

In response to questions, the Chairman and Officers clarified why the decision to retain four Co-opted Members of the Committee had been taken and was still relevant. The Chairman reported that two different Co-optees were needed to sit on the two separate complaints stages – assessment and hearing. It was also not unusual for there to be more than one complaint progressing at the same time and for their attendance to be required at relatively short notice. Members were satisfied that the number of Co-optees appointed to the Committee should remain at four.

Members were therefore of the view that the appointment process should commence as soon as possible.

A Co-opted Member again suggested that consideration be given to the inclusion of one of the existing Co-optees on the Selection Panel in an observer capacity. This suggestion was supported by the Committee and it was also felt useful for the existing Co-opted Member to be able to contribute to the deliberations following interviews and to be able to feed into the questions ahead of the interview process.

RESOLVE – That the Committee note the vacancy and request that the Town Clerk commence the recruitment process as soon as possible.

12. INFORMAL MEETING OF THE STANDARDS COMMITTEE 03/04/2019

The Committee considered a separately circulated report of the Town Clerk setting out the main points raised by Members at an informal meeting of the Standards Committee held on 3 April 2019 following the resignation of a Co-opted Member of the Committee and calling for wider discussion amongst the Committee on these.

The Deputy Chairman stated that she felt that there had been a significant amount of unfairness in terms of the treatment of all Members of the Standards Committee, but particularly its Co-opted Members in recent months. She expressed particular concerns around matters being raised at the Court of Common Council, in public session, where Co-opted Members had no opportunity to respond. Wider concern was also expressed around the fact that Members were able to put a Motion to the Court asking for the removal of a Member from a Committee without the Committee in question receiving prior notice of this or being given the ability to address concerns. This often meant that the Court were not provided with all of the necessary facts or recommendations from relevant Committees/Officers. The Chairman agreed that this was something that needed further consideration.

A Co-opted Member stated that there seemed to be a need for the wider Court to be educated as to the role of Co-opted Members in general. He went on to question the appropriate use of the Corporation's email system and whether recent emails had been in breach of the organisation's fair use policy. He hoped that this matter would be addressed. Members agreed that there should be sanctions in place around this behaviour in the same way that there would be for many Members acting in their professional capacities. The Chairman underlined that this should be viewed as a reputational risk not only to those individuals engaging in the behaviour but also to the Corporation. She underlined that these email chains were sent to elected Members only, with Co-opted Members (of any Committee) not given sight of these. There would also appear to be a question around the appropriate processing of individuals details. The Chairman suggested that it would be useful for this Committee to consider a future report as to appropriate/inappropriate Member email use.

In relation to the possibility of this Committee requesting that the Audit and Risk Management Committee consider adding 'Standards issues' to its risk register, the Committee questioned whether the types of issues being discussed were wider than the Standards Committee in terms of appropriate email use, inappropriate behaviour in general and the processing of personal information. A Co-opted Member seconded this view and questioned whether recent events were symptomatic of something wider and a cultural resistance to the Standards regime per se in some quarters.

The Town Clerk clarified that there was a hierarchy in terms of risk with both Corporate and Departmental Risk Registers in existence. It was suggested that the risk might therefore be more appropriately included on the Comptroller and City Solicitor's departmental risk register. A Member clarified that an information security risk already featured on the Corporate risk register.

RESOLVED – That:-

- (i) A future report concerning the appropriate use of email by Members be considered by the Standards Committee;
- (ii) The Committee request a report back on the potential of amending Standing Orders to ensure that any future Motion calling for the removal of a Member from a Committee should not go directly to the Court of Common Council without the Committee concerned being notified of/able to consider the matter in advance;
- (iii) The Standards Committee seek the views of the Audit and Risk Management Committee on any matters it considers to have risk aspects going forward.

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

There were no questions.

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT
PETITION OF RESIDENTS OF THE CITY OF LONDON REGARDING THE
CITY CORPORATION'S CURRENT "STANDARDS" POLICY AND
PRACTICE**

The Committee considered a separately circulated report of the Town Clerk asking that Members consider the petition referred to them by the Court of Common Council.

Mary Durcan and Barbara Newman wished to place on record that they were signatories of the petition.

The Chairman stated that, given the petition was based on criticism of current policy, her main concern was around how much detail on the current policy signatories were actually given. A Member commented that he had been personally informed by a resident who was approached to sign that signatories were provided with no information and when this was questioned, details were refused.

The Chairman stated that the recommendation of the Town Clerk was that this matter should now be referred back to Officers to report back on to the Standards Committee. Further discussions could then be had at this point. The Chairman suggested it might be useful, meanwhile, for her to send a short letter to signatories, which sought to address some apparent confusion regarding policy. Since the vast majority of signatories were residents from the Barbican or Golden Lane Estates, this could be done easily by using their own communication channels; only a few dozen residents would need to be written to individually. It was hoped that this may provide some clarity going forward and help to underline that a major external review of the City Corporation's Standards Regime had only recently taken place and that the new Dispensations regime had only been in operation for 2 months and would be subject to an annual review.

The Committee unanimously supported this suggestion and suggested that the letter be drafted by the Chairman in consultation with the Deputy Chairman and the Comptroller and City Solicitor and Director of Communications. It was felt that the letter should also signpost where recipients might find more detailed information on the City Corporation's Standards regime as a whole.

The Chairman also undertook to circulate the letter to all Members of the Court and all Co-opted Members of the Standards Committee for information.

The Comptroller and City Solicitor confirmed that he was proposing to append the details of all signatories to the report concerning the petition as a non-public document. Members would then need to decide whether to consider this in open or closed session.

RESOLVED – That the petition be referred to Officers to produce a report for further consideration by the Standards Committee at their next meeting.

15. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) 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 I of the Schedule 12A of the Local Government Act.

16. **NON-PUBLIC MINUTES**

The non-public minutes of the meeting held on 25 January 2019 were considered and approved as a correct record.

17. **NON-PUBLIC MINUTES OF HEARING SUB (STANDARDS)**

The non-public minutes of the Hearing Sub (Standards) Committee meeting held on 1 March 2019 were received.

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

There were no questions raised in the non-public session.

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

A question regarding the panel membership at a recent meeting of the Disputations Sub (Standards) Committee held on 1 April 2019 was raised.

The meeting ended at 1.04 pm

Chairman

Contact Officer: Gemma Stokley
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DISPENSATIONS SUB (STANDARDS) COMMITTEE

Wednesday 3 July 2019

Minutes of the meeting of the Dispensations Sub (Standards) Committee held at the Guildhall EC2 at 3.30pm.

Present

Members:

Caroline Addy (Chairman)
Mary Durcan

Jeremy Simons

Officers:

Michael Cogher	- Comptroller and City Solicitor
Edward Wood	- Comptroller and City Solicitor's Department
Antoinette Duhaney	- Town Clerk's Department

1. APOLOGIES

Apologies for absence were received from Judith Barnes (Co-optee).

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

There were no declarations of interest.

3. DISPENSATION REQUESTS

The Sub-Committee proceeded to consider the dispensation requests submitted by Mark Bostock, Susan Pearson, Jason Pritchard and Brian Mooney.

Mark Bostock

The Sub-Committee considered your application for a dispensation relating to a long lease of a flat and lease of a store in the Barbican residential estate.

Details of dispensation sought

To speak and vote for the remainder of your term of office (until March 2021) on any matter which affects your constituents and in which you may have a disclosable pecuniary interest, except for a matter which:

(a) affects you uniquely or more than any of your constituents; and

(b) insofar as regards a dispensation to vote only, falls within the restriction imposed by section 618 of the Housing Act 1985 for as long as that provision remains on the statute book.

Details of dispensations granted

The following dispensations were granted for the remainder of your current term of office (until March 2021):

- (1) To speak on general housing matters, as identified in the dispensations policy, and also car parking spaces and private storage spaces relating to the Barbican residential estate, insofar as those issues affect residents of the Barbican residential estate equally; and
- (2) To speak and vote on planning application (18/00335/LBC) at the Planning and Transportation Committee on 30 July 2019 and any subsequent meeting at which that application is considered; and
- (3) To speak and vote on the setting of council tax; and
- (4) To speak on licensing applications with the same rights as a member of the public, in accordance with the dispensations policy.

Reasons

Under the Localism Act 2011 the Sub-Committee may grant a dispensation only if, after having had regard to all relevant circumstances, it considers that one of the statutory grounds is satisfied. The Sub-Committee considered that the terms of the dispensation sought were too widely drafted and lacked supporting information to enable it to reach such a conclusion.

The Sub-Committee noted the guiding principle in paragraph 5 of the dispensations policy, that Members should generally be granted a dispensation to speak (but not vote) on all matters concerning their Ward where they have an engaged disclosable pecuniary interest, other than when that interest would be directly and materially impacted.

However, the Sub-Committee also noted that this must be subject to the proper exercise of the statutory discretion in each case. The Sub-Committee considered that without a more detailed application it was impossible for them to carry out the assessment of the statutory grounds that the Localism Act requires, or to determine when an interest would be directly and materially impacted in line with the dispensations policy.

This reflects Appendix 3 paragraph (j) of the dispensations policy, which states that a focussed application is more likely to be successful, as this enables the Sub-Committee to consider a specific set of circumstances. You are entitled to submit a revised application. It should be noted that, whilst use of the approved application form is not currently obligatory, it has been designed to assist applicants in including all relevant information.

The Sub-Committee were however satisfied that granting some specific elements of your application would be in the interests of persons living in the City. In relation to (1), the Sub-Committee were informed that you had previously been granted a dispensation until April 2020 in similar terms.

The Sub-Committee noted your change of circumstances, in that at the time of your original application you did not actually hold a lease of a store in the Barbican residential estate. The Sub-Committee also noted that, due to the timescales involved, the Town Clerk had already reconfirmed your existing dispensation under urgency procedures, with an extended expiry date of March 2021. For the avoidance of doubt the Sub-Committee were happy to endorse that decision.

The Sub-Committee considered whether you should additionally be allowed to vote on those matters. In reaching its decision the Sub-Committee had due regard to the dispensations policy, and in particular Appendix 3 paragraph (b), which provides that a dispensation to vote will only be granted in exceptional circumstances. The Sub-Committee did not consider that any exceptional circumstances had been successfully argued in your application and therefore the request to vote was refused.

In relation to (2), the Sub-Committee noted that planning application (18/00335/LBC) would not now be considered until 30 July 2019 at the earliest. The Sub-Committee also noted that since submitting your application you had been advised by the Monitoring Officer that you would not have a disclosable pecuniary interest in the planning application in question.

The Sub-Committee agreed with the Monitoring Officer's assessment but understood your desire for further reassurance on this point. They were also mindful of paragraph 9 of the dispensations policy, which states that an application will not normally be refused simply on the basis that a dispensation is not thought to be necessary. The Sub-Committee considered that this did constitute exceptional circumstances and therefore they were prepared to grant you a dispensation to speak and vote on that planning application.

In relation to (3) and (4) the Sub-Committee were willing to provide you with the other dispensations that the Town Clerk is able to grant under delegated authority and for which you are eligible. It should be noted that a dispensation to speak on all planning applications as a member of the public until the Ward elections in 2021 is not available to you as you are a Member of the Planning and Transportation Committee.

Susan Pearson

The Sub-Committee considered your application for a dispensation relating to your long lease of a flat in the Golden Lane Estate.

Details of dispensation sought

To speak and vote for the remainder of your term of office (until March 2021) on any matter which affects your constituents and in which you may have a disclosable pecuniary interest, except for a matter which:

- (a) affects you uniquely or more than any of your constituents; and
- (b) insofar as regards a dispensation to vote only, falls within the restriction imposed by section 618 of the Housing Act 1985 for as long as that provision remains on the statute book.

Details of dispensations granted

The following dispensations were granted for the remainder of your current term of office (until March 2021):

- (1) To speak and vote on the setting of council tax; and
- (2) To speak on licensing applications with the same rights as a member of the public, in accordance with the dispensations policy; and
- (3) To speak on general housing matters, as identified in the dispensations policy, insofar as those issues affect residents of the Golden Lane estate equally.

Reasons

Under the Localism Act 2011 the Sub-Committee may grant a dispensation only if, after having had regard to all relevant circumstances, it considers that one of the statutory grounds is satisfied. The Sub-Committee considered that the terms of the dispensation sought were too widely drafted and lacked supporting information to enable it to reach such a conclusion.

Although you specifically mentioned a meeting of the Community and Children's Services Committee on 12 July 2019 in your application, you were only able to say that matters are frequently considered by this committee which affect your constituents and in which you may occasionally have a disclosable pecuniary interest.

The Sub-Committee noted the guiding principle in paragraph 5 of the dispensations policy, that Members should generally be granted a dispensation to speak (but not vote) on all matters concerning their Ward where they have an engaged disclosable pecuniary interest, other than when that interest would be directly and materially impacted.

However, the Sub-Committee also noted that this must be subject to the proper exercise of the statutory discretion in each case. The Sub-Committee considered that without a more detailed application it was impossible for them to carry out the assessment of the statutory grounds that the Localism Act requires, or to determine when an interest would be directly and materially impacted in line with the dispensations policy.

This reflects Appendix 3 paragraph (j) of the dispensations policy, which states that a focussed application is more likely to be successful, as this enables the Sub-Committee to consider a specific set of circumstances. You are entitled to submit a revised application. It should be noted that, whilst use of the approved

application form is not currently obligatory, it has been designed to assist applicants in including all relevant information.

The Sub-Committee were however satisfied that it would be in the interests of persons living in the City to provide you with the dispensations that the Town Clerk is able to grant under delegated authority and for which you are eligible. It should be noted that a dispensation to speak on all planning applications as a member of the public until the Ward elections in 2021 is not available to you as you are a Member of the Planning and Transportation Committee.

Jason Pritchard

The Sub-Committee considered your application for a dispensation relating to your tenancy of a flat from the City Corporation.

Details of dispensation sought

To speak and vote for the remainder of your term of office (until March 2021) on any matter which affects your constituents and in which you may have a disclosable pecuniary interest, except for a matter which:

- (a) affects you uniquely or more than any of your constituents; and
- (b) insofar as regards a dispensation to vote only, falls within the restriction imposed by section 618 of the Housing Act 1985 for as long as that provision remains on the statute book.

Details of dispensations granted

The following dispensations were granted for the remainder of your current term of office (until March 2021):

- (1) To speak and vote on the setting of council tax; and
- (2) To speak on planning and licensing applications with the same rights as a member of the public, in accordance with the dispensations policy; and
- (3) To speak on general housing matters, as identified in the dispensations policy, insofar as those issues affect all of the City Corporation's tenants or leaseholders on your estate equally.

Reasons

Under the Localism Act 2011 the Sub-Committee may grant a dispensation only if, after having had regard to all relevant circumstances, it considers that one of the statutory grounds is satisfied. The Sub-Committee considered that the terms of the dispensation sought were too widely drafted and lacked supporting information to enable it to reach such a conclusion.

Although you specifically mentioned a meeting of the Community and Children's Services Committee on 12 July 2019 in your application, you were only able to say that matters are frequently considered by this committee which affect your constituents and in which you may occasionally have a disclosable pecuniary interest.

The Sub-Committee noted the guiding principle in paragraph 5 of the dispensations policy, that Members should generally be granted a dispensation to speak (but not vote) on all matters concerning their Ward where they have an engaged disclosable pecuniary interest, other than when that interest would be directly and materially impacted.

However, the Sub-Committee also noted that this must be subject to the proper exercise of the statutory discretion in each case. The Sub-Committee considered that without a more detailed application it was impossible for them to carry out the assessment of the statutory grounds that the Localism Act requires, or to determine when an interest would be directly and materially impacted in line with the dispensations policy.

This reflects Appendix 3 paragraph (j) of the dispensations policy, which states that a focussed application is more likely to be successful, as this enables the Sub-Committee to consider a specific set of circumstances. You are entitled to submit a revised application. It should be noted that, whilst use of the approved application form is not currently obligatory, it has been designed to assist applicants in including all relevant information.

The Sub-Committee were however satisfied that it would be in the interests of persons living in the City to provide you with the dispensations that the Town Clerk is able to grant under delegated authority.

Brian Mooney

The Sub-Committee considered your application for a dispensation relating to your ownership of two flats at Queen's Quay.

Details of dispensation sought

To speak and vote for the remainder of your term of office (until March 2021) on any matter which affects your constituents and in which you may have a disclosable pecuniary interest, except for a matter which:

- (a) affects you uniquely or more than any of your constituents; and
- (b) insofar as regards a dispensation to vote only, falls within the restriction imposed by section 618 of the Housing Act 1985 for as long as that provision remains on the statute book.

Details of dispensations granted

The following dispensations were granted for the remainder of your current term of office (until March 2021):

- (1) To speak and vote on the setting of council tax; and
- (2) To speak on licensing applications with the same rights as a member of the public, in accordance with the dispensations policy.

Reasons

Under the Localism Act 2011 the Sub-Committee may grant a dispensation only if, after having had regard to all relevant circumstances, it considers that one of the statutory grounds is satisfied. The Sub-Committee considered that the terms of the dispensation sought were too widely drafted and lacked supporting information to enable it to reach such a conclusion.

The Sub-Committee noted the guiding principle in paragraph 5 of the dispensations policy, that Members should generally be granted a dispensation to speak (but not vote) on all matters concerning their Ward where they have an engaged disclosable pecuniary interest, other than when that interest would be directly and materially impacted.

However, the Sub-Committee also noted that this must be subject to the proper exercise of the statutory discretion in each case. The Sub-Committee considered that without a more detailed application it was impossible for them to carry out the assessment of the statutory grounds that the Localism Act requires, or to determine when an interest would be directly and materially impacted in line with the dispensations policy.

This reflects Appendix 3 paragraph (j) of the dispensations policy, which states that a focussed application is more likely to be successful, as this enables the Sub-Committee to consider a specific set of circumstances. You are entitled to submit a revised application. It should be noted that, whilst use of the approved application form is not currently obligatory, it has been designed to assist applicants in including all relevant information.

The Sub-Committee were however satisfied that it would be in the interests of persons living in the City to provide you with the dispensations that the Town Clerk is able to grant under delegated authority and for which you are eligible. It should be noted that a dispensation to speak on all planning applications as a member of the public until the Ward elections in 2021 is not available to you as you are a Member of the Planning and Transportation Committee.

4. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no further matters raised.

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

There was no urgent business raised.

The meeting closed at 4.55 pm

Chairman

**Contact Officer: Antoinette Duhaney, 020 7332 1408,
antoinette.duhaney@cityoflondon.gov.uk**

DISPENSATIONS SUB (STANDARDS) COMMITTEE

Wednesday, 4 September 2019

Minutes of the meeting of the Dispensations Sub (Standards) Committee held at the Guildhall EC2 at 2.30 pm

Present

Members:

Caroline Addy (Chairman)	Mary Durcan
Judith Barnes (Independent Person)	Vivienne Littlechild

Officers:

Edward Wood	- Comptroller and City Solicitor's Department
Michael Cogher	- Comptroller and City Solicitor
Antoinette Duhaney	- Town Clerk's Department

1. APOLOGIES

No apologies for absence were received.

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

There were no declarations of interest.

3. DISPENSATION REQUESTS

The Sub Committee proceeded to consider the dispensation requests submitted by Mark Bostock, Susan Pearson, Jason Pritchard, Brian Mooney and Joyce Nash. The Chairman drew the Sub-Committee's attention to the agenda supplement which included the correct version of Mark Bostock's dispensation request. The Sub-Committee also noted that with the exception of Joyce Nash, all of the above requests were previously considered by the Sub-Committee on 03.07.19. However, all four applicants had resubmitted their requests.

The Sub-Committee considered the merits of each application in turn and in respect of the applications from Mark Bostock, Susan Pearson, Jason Pritchard and Brian Mooney, the Sub-Committee considered the reasons given by the Sub-Committee when these four applications were previously considered on 03.07.19 Appendix 6 (pages 35-41). The Sub-Committee also had due regard to Appendix 3 (pages 21-22) of the officer report - Factors to be taken into consideration.

Mark Bostock, Susan Pearson, Jason Pritchard, Brian Mooney

Members had mixed views on whether the Sub-Committee's earlier decision in respect of the above four applicants should be overturned. However, in view of the current review of the implementation of the new dispensations policy and process for considering dispensations, Members were unanimous in their view

that these applications should be deferred pending the outcome of the review and decisions taken by the Standards Committee at its meeting on 4th October 2019.

RESOLVED – That the applications from Mark Bostock, Susan Pearson, Jason Pritchard and Brian Mooney be deferred pending the outcome of the current review and decisions taken by the Standards Committee on 4th October 2019. (a meeting of the Sub-committee will then be convened at the earliest opportunity thereafter to consider these applications).

Joyce Nash

Details of dispensation sought

To speak and vote on matters relating to the expansion of the City of London School for Girls onto the Grade II listed areas of the Barbican Estate at the request of resident electors for the period up to the final decisions made by the Planning & Transportation Committee (as discussion could take place on some of the Committees of which Ms Nash is a Member).

Details of dispensation granted

A dispensation was granted to speak and vote on matters relating to the expansion of the City of London School for Girls for the period until final decisions are made by the Planning & Transportation Committee or for the remainder of the current term of office ending in March 2021, whichever is sooner.

Reasons

Under the Localism Act 2011 the Sub-Committee may grant a dispensation only if, after having had regard to all relevant circumstances, it considers that one of the statutory grounds is satisfied.

Members were of the unanimous view that the application from Joyce Nash could be determined as it related to a request to speak on matter which affected Barbican residents equally. Members felt that Ms Nash was no more affected than any other Barbican estate residents in respect of proposals to expand the City of London School for Girls. Furthermore, Ms Nash had no beneficial interest in land and was not a serving Member of the Planning & Transportation Committee, Barbican Residents Committee or the Board of Governors of the City of London School for Girls.

Referring to Appendix 3 - Factors to be taken into account (page 21), Members were satisfied that Ms Nash had a widely held interest which was common to a significant number of Barbican residents and that Ms Nash was less affected than many other Barbican residents who lived closer to the City of London School for Girls. However, the Sub-Committee felt that a time restriction should be placed on the dispensation so that it was not open ended; it was felt that a dispensation until period until final decisions are made by the Planning & Transportation Committee or for the remainder of the current term of office ending in March 2021, whichever is sooner, was appropriate.

The Sub-Committee noted the guiding principle in paragraph 5 of the dispensations policy, that Members should generally be granted a dispensation to speak (but not vote) on all matters concerning their Ward where they have an engaged disclosable pecuniary interest (DPI), other than when that interest would be directly and materially impacted. Members were satisfied that Ms Nash did not have an engaged DPI.

4. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no further matters raised.

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

There was no urgent business.

The meeting closed at 3.48 pm

Chairman

**Contact Officer: Antoinette Duhaney, Committee & Member Services Officer
020 7332 1408, antoinette.duhaney@cityoflondon.gov.uk**

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Committee(s)	Date:
Standards Committee	4 October 2019
Subject: Review of Dispensations Policy	Public
Report of: Michael Cogher, Comptroller & City Solicitor	For Decision

Summary

This report presents for formal consideration the discussion paper on the Dispensations Policy presented to the informal meeting of the Committee on 6th September 2019 together with the minutes of that meeting and further officer comment. These three items, together with the notes from the Chairman, should be considered together.

Recommendation

- (i) the Committee considers this report, the discussion paper, the previous minutes, Chairman's notes, petition and Wardmote resolution and reviews the Dispensation Policy, instructing officers to make such changes, if any, as it considers appropriate.
- (ii) the Committee determines whether to invite the Policy and Resources Committee, Children and Community Services Committee and Barbican Residential Committee to consider, with the advice of the City Remembrancer, taking steps to seek the repeal of s.618 of the Housing Act 1985.

Main report

1. As the Committee will be aware, the Dispensation Policy, in whatever form it takes, must appropriately balance a number of competing factors. These include the need for effective democratic representation, the interests of residents and other stakeholders and freedom of speech on the one hand, with the need to effectively manage conflicts of interests in a lawful and transparent matter, to assist members in avoiding complaints and protecting the Corporation from legal challenge and to properly apply the statutory scheme under the Localism Act 2011. The legal considerations are set out in more detail in paragraph 4(ii) of the Discussion Paper.
2. In all cases, whether granting a wide dispensation for a four year period or a specific dispensation for a single meeting the decision maker must be satisfied that the dispensation is appropriate in all the circumstances and that one of the statutory grounds is made out – usually either that the dispensation is in the interests of the inhabitants of the area or that it is otherwise appropriate in all the circumstances.

3. It must also be remembered that there is no presumption in favour of granting a dispensation. Indeed, the statutory scheme's starting point is that a member with a disclosable pecuniary interest in a matter may not speak or vote. From that position a member may seek a dispensation and an authority may grant one where a statutory ground is made out and the authority considers it appropriate in all the circumstances.

Dispensations to Speak

4. The current Policy's guiding principal reflects the will of the Court that: "Members would generally be granted a dispensation to speak (but not vote) on all matters concerning their Ward where they have an engaged disclosable pecuniary interest other than when that disclosable pecuniary interest would be directly and materially impacted by the matter to be determined..." (Dispensations Policy paragraph 5).
5. In addition, the Town Clerk has delegated authority to grant dispensations to speak on General Housing Matters, which are widely defined at paragraph 17(c) of the Policy and on planning and licensing matters on the same basis as a member of the public (but still allowing representation of constituents).
6. The practical impact of the Policy since 1 March 2019 is set out in Appendix 4 of the Discussion Paper. Dispensation Sub-committees have been reluctant to grant dispensations applied for in very wide terms which would in the Sub-committees' view have prevented them from considering all relevant circumstances and properly applying the statutory scheme.
7. It should also be noted that the function of granting a dispensation can only be properly exercised by the Court, a committee/sub-committee or an officer. It cannot be delegated to the member concerned either explicitly or by implication.
8. Accordingly, the Committee is invited to consider whether any changes to the current approach to speaking should be implemented.

Dispensations to Vote

9. Under the Localism Act a member with an engaged disclosable pecuniary interest may not speak or vote. A dispensation may remove the disability to speak and/or vote. The Corporation has, as it is entitled to do, concluded that allowing voting on a matter where a member has a DPI requires more careful consideration and justification than speaking for obvious reasons – the influence exercised is greater where a member votes in their clear self-interest as is the danger of challenge.
10. The current approach is to grant dispensations to vote only in exceptional circumstances. Since March two such dispensations have been granted, one in relation the City of London School for Girls' proposed expansion to allow equality of representation for Barbican residents and the other in circumstances where the Sub-committee did not believe there was a DPI engaged in the first place i.e. as a safety net.

11. In the case of resident members' whose interest arises from a beneficial interest in property it is difficult to see how an engaged DPI would not also trigger s.618 of the Housing Act 1985 in respect of a decision at a housing management committee or the rule against actual or apparent bias in the case of a planning or licensing decision (see Discussion Paper paragraph 4(b)).
12. One suggestion made on 6th September was that decisions on whether to grant dispensations should be made by the committee in question, with the benefit of advice, at the meeting in question. A written request would still have to be made. Such a change would need to be made by the Court. There are various pros and cons of such an approach. On the positive side decisions would be committee specific and dealt with on the day of the meeting. On the other hand, it would add further work for committees and inconsistencies of approach could arise. Should members wish to explore this further it may be advisable to undertake consultation.
13. The Committee is invited to consider whether any changes to the current approach to voting should be implemented.

S.618 Housing Act 1985

14. S.618 and its implications are discussed in detail in paragraph 4(b)(i) of the Discussion Paper. As will be seen it presents particular difficulties in granting a dispensation to vote on a housing management committee where a member's DPI arises from a beneficial interest in land e.g. their lease or tenancy. It is difficult to see how this type of DPI would not also engage s.618 and the member would commit an offence were they to vote notwithstanding any dispensation granted by a Dispensations Sub-committee. Whilst s.618 is clearly relevant to the Committee given that a breach of s.618 would also be a breach of the Code of Conduct its existence, since 1957, recognised in Standing Orders is not squarely within the Committee's remit. The Committee may therefore wish to refer the question of seeking repeal to the Policy and Resources Committee, and the Children and Community Services and Barbican Residential Committees who exercise housing management functions.

Procedural & Administrative Matters

15. Some of the procedural and administrative issues which revolve around the use of forms and the efficient and effective management of the process together with some changes which could be considered by the Committee are set out in paragraph 5 of the Discussion Paper.
16. One particular practical issue which has arisen is in relation to the use of the form. The current form was designed in order to assist members in putting the best case possible for a dispensation and to reduce the risk of applications being refused simply on the basis of insufficient information. In practice however some members have refused to use the form. A possible example of a considerably shorter form is therefore included at Appendix 1, although this is obviously subject to any other policy changes.

Conclusion

17. The Committee will see that whilst it retains a wide discretion as to the policy and procedure to adopt it is not an unlimited one and it must strike what it considers to be the appropriate balance between the competing needs of democratic representation and public confidence within an efficient and effective administrative system. It is therefore invited to consider the matters before it and instruct officers as appropriate.

Appendices

- Appendix 1 - Draft Short Form Application

Background Documents

- Comptroller and City Solicitor's report to informal meeting on 6 September 2019
- Chair's note to informal meeting on 6 September 2019
- Minutes of informal meeting on 6 September 2019

Michael Cogher

Comptroller & City Solicitor

Tel: 0207 332 3699

Email: michael.cogher@cityoflondon.gov.uk



REQUEST FOR A DISPENSATION TO SPEAK AND/OR VOTE WHERE A MEMBER / CO-OPTED MEMBER HAS A DISCLOSABLE PECUNIARY INTEREST

The granting of dispensations is a function of the Standards Committee and its Dispensations Sub-Committee. Authority to grant some straightforward applications has also been delegated to the Town Clerk. You are advised to read the policy and guidance on the granting of dispensations before completing this form.

Please complete this form electronically and email it to declarations@cityoflondon.gov.uk. Alternatively, paper forms can be submitted to the Committee and Member Services Team in the Town Clerk's Department, but typed forms should be provided if at all possible.

Name:

Date:

Dispensations available from the Town Clerk

I request a dispensation until the Ward elections in 2021 to enable me:

- ☐ to speak and vote on the setting of council tax
- ☐ to speak as a member of the public on planning applications
- ☐ to speak as a member of the public on licensing applications
- ☐ to speak on general housing matters

Please complete the rest of this form if you are applying for any other dispensation from the Standards Committee

Please describe the nature of the disclosable pecuniary interest(s) that would otherwise prohibit you from speaking and/or voting:

I request a dispensation to enable me to:

☐ speak

☐ vote

on the following matter(s):

for a specific committee meeting or meetings, or for a specific period, as follows:

Please provide any relevant information in support of your application, including a consideration of the statutory grounds for granting a dispensation (paragraph 13) and the additional factors (Appendix 3) set out in the policy:

Note from Chair

Bearing in mind the legal parameters detailed in the Comptroller's report, the following options, in relation to dispensations to speak and procedures, might be considered. These are rooted variously in the Comptroller's discussion paper for the meeting held 6/9/19, and in points raised at that meeting. There might well be other options members wish to consider.

Dispensations to Speak

Members might wish to consider extending 'Dispensations available from the Town Clerk' to include 'speaking as a member of the public on planning and licensing applications' either 'to speak on any licensing and planning applications affecting ward constituents' or 'to speak on any matters affecting ward constituents' or 'to speak on any matters.'

Procedure

Members might wish to consider

- requiring members to take advice, as to the engagement of DPI, from the Monitoring Officer or relevant committee lawyer, prior to submitting an application
- altering the assessment criteria so complaints in relation to speaking and voting will not be investigated, provided that the member has obtained advice in good faith and with full disclosure from the Monitoring Officer or committee lawyer, that a DPI is not engaged.
- setting deadlines for receipt of applications
- providing guidance on what constitutes an urgent application
- removing the requirement that a member may not consider an application for a dispensation for a committee on which they themselves sit
- having pre meetings of committees to decide applications for dispensations to vote
- fixing meetings of dispensations panels at regular intervals for the following year, whilst retaining means of dealing with urgent applications

Forms

- Making use of forms mandatory
- shortening and simplifying form (see appendix 1 OF Comptroller and City Solicitor's report)
- having a minimum period between the submission of identical applications

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Committee(s):	Date:
Standards Committee	4 October 2019
Finance Committee	15 October 2019
Establishment Committee	29 October 2019
Court of Common Council	5 December 2019
Subject: Insurance and Indemnities for Independent Persons	Public
Report of: The Comptroller and City Solicitor and the Chamberlain	For Decision
Report authors: Michael Cogher and Kate Limna	

Summary

This report sets out the position in relation to the potential personal liability of the Corporation's Independent Persons appointed under the Localism Act 2011 when carrying out their duties and the recommendations of the Committee on Standards in Public Life that local authorities provide indemnities to their Independent Persons in relation to their comments during the discharge of their duties. The report proposes that the Court of Common Council should indemnify Independent Persons in respect of any personal liability arising in the circumstances defined in the report.

Recommendation

Members are asked to approve the proposal in this report for onward approval by the Court of Common Council to indemnify and/or insure Independent persons (through the extension of the Corporation's Defamation Cover) against awards of damages or expenses incurred arising out of the disclosure of any comments made in good faith during the exercise of their statutory functions as Independent Persons.

Main Report

Background

1. The Localism Act 2011 requires a local authority to appoint at least one "Independent Person" to participate in the arrangements a local authority must put in place to consider and determine complaints made against a member in relation to its Code of Conduct.
2. An Independent Person must be consulted i.e. their views must be sought and taken into account, by the authority before it takes a decision on an allegation that a member has breached the Code of Conduct that it has decided to investigate. Their views may also be sought in other circumstances including by a member subject to an allegation, and in relation to disciplinary proceedings against the three statutory officers (head of paid service, chief finance officer and monitoring officer).

3. The Corporation currently has three Independent Persons and the Corporation's arrangements for dealing with complaints against members require an Independent Person's views to be sought at the assessment, hearing and appeal stages of a complaint. Independent Persons are not members of the Corporation or any of its committees. They are not therefore protected by the veil of incorporation or current insurance/indemnity arrangements for members and officers. They are therefore at risk of personal liability for the opinions they express should those opinions be found to be defamatory. Whilst the law of defamation itself may provide protection e.g. by the application of qualified privilege, Independent Persons are at risk of being pursued individually with all the implications that entails such as legal costs.
4. When Charles Bourne QC reviewed the Corporation's standards framework in December 2016, one of his recommendations was that the Independent Person should answer questions and express views in the presence of all those attending the hearing. This recommendation was subsequently supported by the Court of Common Council and is reflected in the current arrangements.
5. The Committee on Standards in Public Life ("CSPL") has recently carried out a substantial review of the arrangements for dealing with ethical standards in local government. Its report, published in January 2019, was entitled "Local Government Ethical Standards – A Review by the Committee on Standards in Public Life".
6. Two of the recommendations made by the CSPL in relation to the Independent Persons were as follows:

Recommendation 9: The Local Government Transparency Code should be updated to provide that the view of the Independent Person in relation to a decision on which they are consulted should be formally recorded in any decision notice or minutes.

Recommendation 11: Local authorities should provide legal indemnity to Independent Persons if their views or advice are disclosed. The government should require this through secondary legislation if needed.

7. The CSPL provided some additional commentary in chapter 3 of their report as follows:

We have noted the recent First Tier Tribunal cases which have found that it will often be, on balance, in the public interest to disclose the view or advice of the Independent Person under the Freedom of Information Act 2000. As above we support the Independent Person's advice being made public, which could enhance openness and accountability. However, we are concerned that Independent Persons would not automatically enjoy indemnity if a councillor or member of the public were to take legal action against them, in a same way that a member or officer of an authority would. Local authorities should take steps to provide legal indemnity to Independent Persons if their views are disclosed, and the government should confirm this through secondary legislation if needed.

8. An initial report on all of the recommendations of the CSPL was received by the Standards Committee in May 2019. Members agreed in principle with the provision of a legal indemnity to the Independent Persons and requested that a further report on this issue should be brought back to all of the relevant decision-making committees for onward approval by the Court of Common Council.

Current Position – Immunity and Indemnity

9. Local authority members and officers' benefit from certain immunities. Section 265 of the Public Health Act 1875 (extended by s. 39 of the Local Government (Miscellaneous Provisions) Act 1976) provides that "no matter or thing done bona fide for the purpose of executing a public general act or local act by any member or officer of a local authority or any other person acting under direction of the authority shall subject them personally to any action liability claim or demand whatsoever". This immunity would not apply to Independent Persons.
10. The Local Authorities (Indemnities for Members and Officers) Order 2004 permits indemnities and/or insurance to be provided in relation to any action or failure to act by a Member or officer providing the member or officer is carrying out a function at the request of, with the approval of, or for the purposes of, the authority. The power extends to cases where the member or officer exercises the function in a capacity other than that of a member or officer of the authority, for example, as a member of an outside body. The Order applies to the City Corporation in its capacities as local authority and police authority. As currently drafted the Order would not apply to Independent Persons.
11. However, the general power of competence under section 1 of the Localism Act 2011 would allow the granting of an indemnity and/or insurance to protect Independent Persons against loss, damage and expenses arising out of the disclosure of any comments made in the course of their statutory duties in good faith.

Insurance

12. The Corporation's public liability insurance policy includes cover for the legal costs and liability for damages for civil claims of defamation. Indemnity under the policy extends to employees unless the Corporation wishes to withhold the indemnity. The policy definition of employee encompasses "*any person co-opted, seconded or appointed to assist the [Corporation] in their business*". Application of cover will follow on approval of this report's recommendation.

Corporate & Strategic Implications

13. Members and Officers already have protection in place dating from 2011 and the Pensions Board have recently been granted an indemnity in relation to GDPR.

Conclusion

14. It is recommended that the Corporation follow the recommendations of the Committee on Standards in Public Life and grant an indemnity and/or provide insurance to protect Independent Persons in the circumstances set out above.

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Committees	Dated:
Standards Committee	4 October 2019
Subject: Annual Update to Member Declarations	Public
Report of: Town Clerk	For Discussion
Report author: Gemma Stokley, Senior Committee and Member Services Officer	

Summary

This report provides Members with an overview of the annual update to the Members' Declarations which took place in July 2019.

Each of the City of London Corporation's elected Members and relevant Co-opted Members (those captured by the Code of Conduct) were contacted via email in early July 2019 with a request that they review their existing Members' Declaration and, having re-familiarised themselves with the Code of Conduct and the appropriate guidance, submit any amendments to the Town Clerk's Department by no later than 5th August 2019.

This report sets out the background to the annual reminder process and the outcome of the exercise.

Recommendation

Members are asked to note the report and to consider any further steps it considers necessary to ensure compliance with the Code of Conduct.

Main Report

Background

1. Whilst it is not a statutory requirement for registers of interest to be updated annually, the Code of Conduct requires Members to maintain an up to date register of interests, and the relevant guidance states that Members will be contacted once a year to review and, where necessary, update these. In accordance with good practice, the annual reminder is normally circulated towards the start of each new municipal year.
2. All elected Members and those Co-opted Members who serve on the City Corporation's committees and sub-committees that are captured by the Code of Conduct were contacted via email on 9 July 2019 and reminded about the requirements under the Code of Conduct.
3. All were asked to respond either in writing by no later than 5 August 2019. Where no amendments were required to the existing Members' Declaration

and/or no non-pecuniary interests required registration, Members and Co-opted Members were advised that they should still submit a 'nil response' confirming that this was the case.

Current Position

4. In advance of the Annual Update an up to date list of elected Members and of relevant Co-opted Members was compiled and every time a response has been received, this has been logged accordingly. Where amendments have been highlighted, these have been updated on the committee management system which also enables the changes to be visible to the public via the City Corporation's webpages.
5. A reminder email was sent to all later in July about the importance of this exercise and a short piece was also included within the July 2019 Members Briefing.
6. As at 20 September 2019, just 41 elected Members have responded to the annual reminder and all updates have been made to the on-line register of interest webpages.
7. With regards to the Co-opted Members, 41 responses are still outstanding from a total of 81 Co-optees who are currently captured by the Code. Where updates have been made, all updated forms are also now available online.

Moving Forward

8. The response rates from both elected and Co-opted Members do not compare favourably with those of previous years. In previous years, the Standards Committee have taken further steps in an attempt to ensure compliance which have included writing to individual Members and also issuing reminders via relevant Committee Chairmen.
9. As and when updates are required, including the registration of gifts and hospitality, the changes will be effected immediately so that the on-line declarations remain up to date/ a 'live document' for all.
10. It is proposed that the annual reminder to Members continue to take place each year following the start of the new municipal year. This will complement a more significant exercise of informing Members about the requirements of the Code of Conduct following Ward Elections, the next being in 2021. Member Development sessions regarding the Code of Conduct, good governance and lawful decision-making, as part of the formal Member Development offer to Members, will also continue to take place on a rolling basis.

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.

Other Implications

11. The annual reminder process has required a significant amount of resources, including officer time, to ensure that all Members and Co-opted Members are aware of the requirements of the Code of Conduct, including the new non-pecuniary requirements; and all updates have been entered onto the committee management system and published on-line in a timely manner.

Conclusion

12. 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.

Background Papers

Members' Code of Conduct (as agreed March 2018)

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Committee(s): <u>For Decision</u> Policy and Resources Committee <u>For Information</u> Board of Governors – City of London Freemen’s School Board of Governors – City of London School for Girls Board of Governors – City of London School Standards Committee	Date(s): 4 July 2019 25 September 2019 7 October 2019 9 October 2019 4 October 2019
Subject: The City of London Corporation’s Independent Schools and Parent Governors	Public
Report of: The Town Clerk and the Comptroller & City Solicitor	For Decision
Report author: Polly Dunn, Senior Committee and Member Services Officer Edward Wood, Chief Solicitor	

Summary

This report concerns the management of the City Corporation’s three independent schools, and the extent to which the parents of current pupils can and should be able to serve as Governors. This report recommends making some change to the current constitutional arrangements and presents two options for consideration, depending on whether Members are for or against parental representation on those Boards.

Recommendation(s)

Members of the Policy and Resources Committee are asked to either:

- Recommend to the Court of Common Council that the parents or guardians of any child currently studying at the City of London School, the City of London School for Girls or the City of London Freemen’s School should be ineligible to sit on the Board of Governors for that School; or
- Request that the Board of Governors of the City of London School, the City of London School for Girls and the City of London Freemen’s School consider in more detail whether it is in the Schools’ best interests to allow parental representation and, if so, how this could best be achieved.

Main Report

Background

1. This report relates to the constitutional and governance arrangements for the Boards of Governors (“the Boards”) of the City Corporation’s three independent schools – the City of London School, the City of London School for Girls and the City of London Freemen’s School (“the Schools”).
2. In the last year the Standards Committee has received two requests for a dispensation to enable Members with children at one of the Schools, who had been appointed to the Board of that School, to fully participate in its business. The Standards Committee felt unable to grant those applications and as a result one Member subsequently stood down from his position as Governor and the other is not currently attending meetings, pending further consideration of this matter.
3. Following the second application, the Standards Committee asked that a resolution be sent to the Policy and Resources Committee, in view of that Committee’s overall governance role, on the issue of interests affecting the ability of a Member with children at one of the Schools to serve on that School’s governing body, in order to allow the Policy and Resources Committee to consider the matter further and possibly seek a solution to it. The resolution that was submitted is included at Appendix 1.
4. The Policy and Resources Committee considered the resolution at its meeting on 15 November 2018. The Committee agreed that it was unfortunate that Members with children at one of the Schools were effectively precluded from serving on the Board and that this was contrary to practice at other independent schools or in relation to parent governors more generally. Reference was also made to the way in which the provisions of local government legislation were perhaps inappropriately applied to the City Corporation’s non-local authority business. The resolution was noted and officers were asked to explore a solution to the issue identified.

The constitutions of the School Boards

5. The constitution and terms of reference of each of the three School Boards, as approved by the Court of Common Council, is attached at Appendix 2. Members will note that each of the Boards currently include provision for appointing a number of co-opted Governors with experience relevant to the Board. The co-opted Governors do not count towards the quorum, are not eligible to be Chairman, and any decision taken requires the agreement of a majority of the Common Council Governors present at the meeting and voting. Historically none of the co-optees have been parents of current pupils, and there is no provision for dedicated parental representatives (“Parent Governors”). Equally, however, there is nothing explicit to say that the parents of current pupils are ineligible to serve as Common Council Governors or co-opted Governors.

6. The governing documents of the three Schools (the Scheme and Acts of Parliament) are silent on the precise composition of the Boards. The City of London School and the City of London Freeman's School are subject to statutory provisions regarding the ineligibility of any person with an interest to sit on the Board in question. However this is considered to be restricted to works contracts rather than having a wider application to a parent with a child at the School.

Position under the Localism Act 2011 and the Members' Code of Conduct

7. The City Corporation's Member Code of Conduct applies to both elected Members and co-opted Members, and to all of the City Corporation's functions, not just its local authority or police authority functions. Members must have regard to the Seven Principles of Public Life: Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership.
8. Paragraph 13 of the Code of Conduct, which reflects section 31 of the Localism Act 2011, specifically provides in relation to interests that:

"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."

9. One of the categories of disclosable pecuniary interest specified in The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 is any undischarged contract between a Member (or their spouse/partner) and the City Corporation for goods or services. As a parent of a child at one of the Schools, a Member (or their spouse/partner) will in most cases be party to a contract with the City Corporation for their child's education and will therefore have a disclosable pecuniary interest in much of the business of the relevant Board. This does not prevent a Member from being appointed to that Board but, in the absence of a dispensation, their participation in the work of that Board is likely to be significantly impacted. The City Corporation may be unique in applying this particular governance framework to its three Independent Schools, although all schools will have their own governance arrangements in place.
10. Under section 33 of the Localism Act 2011 the City Corporation may, on a written request, grant a dispensation for up to four years allowing a Member to speak and/or vote in the circumstances described in the dispensation, notwithstanding any disclosable pecuniary interest. The granting of dispensations is a function that the Court of Common Council has delegated to the Standards Committee. Members will know that the Standards Committee recently produced a policy and guidance document on the granting of dispensations, which contains much more detailed information. That policy and guidance document does not specifically address the issue of Members with children at one of the Schools, partly because of this separate work stream.
11. In order to grant a dispensation, one of the statutory grounds must be satisfied. There are only two grounds that are potentially relevant in this case. One is that,

without the dispensation, the number of persons prohibited from participating in any particular business would be so great a proportion of the body transacting the business as to impede the transaction of the business. This ground would not be satisfied at the present time, although could potentially be satisfied in the future if circumstances changed, or the composition of the Boards was altered. The other statutory ground is that it is otherwise appropriate to grant a dispensation. This ground could be made out if, for example, it was felt that the introduction of Parent Governors would assist with the good governance of the Schools.

12. In relation to the previous requests, one Member applied for a dispensation to speak and vote on all core strategic business of the Board where no direct pecuniary interest arose. The other sought a dispensation to speak and vote on all business of the Board, with the caveat that he would not vote on any matter that had a direct financial impact on him as the parent of a pupil, such as school fees. The grounds advanced were generally that: (i) if a dispensation were not granted the Board would be left with a further vacancy and this may impact on its ability to transact its business; and (ii) it was appropriate to grant a dispensation because it was common practice for parents to serve on school governing bodies in both independent and maintained schools, and to withdraw from the business when a specific pecuniary interest arises, and that a majority of the discussions would have no such direct impact.
13. In considering those requests the Standards Committee noted that there were some current Board vacancies, but felt that this was not sufficient to satisfy the first statutory ground. On the second ground, it was noted that the City Corporation had chosen not to have Parent Governors on the Boards, and that the role of a Common Council Governor was different. Regarding the wording used in the applications, the Standards Committee also felt that it was not possible to easily determine in every case what business before the Board was or was not relevant to the disclosable pecuniary interest. Whilst being sympathetic to the possibility of a Parent Governor role, and the content of the applications, both requests were therefore refused. However, there is currently nothing to stop further requests being submitted in the future, either for a Governor's term of office, or for a specific meeting or item of business, and any application would be considered on its own merits, and in line with the new policy.
14. It is also important to bear in mind that the City Corporation has voluntarily chosen to apply its Member Code of Conduct to its City's Cash functions, including its management of the Schools. This has advantages in terms of simplicity and consistency, particularly for those Committees exercising both local authority and non-local authority functions. It may also assist with the public perception of good governance. Ultimately, however, it would be open to the Court of Common Council to adopt alternative arrangements for the Schools, to facilitate the introduction of Parent Governors, if this was considered to be beneficial or necessary. For example, the Court of Common Council could disapply the disclosable pecuniary interest provisions in respect of contracts for education between Members of the Board and the City Corporation.

Feedback from the Schools

15. The jointly held opinion of the Headteachers of the three Schools is provided in a detailed note at Appendix 3, which analyses the issues and compares and contrasts the position with state schools and other independent schools. In summary, they advise that larger, more established independent schools very rarely have current parents on their boards. The Headteachers have serious reservations about allowing elected Members with children at one of the Schools to sit on its Board as a Common Council Governor under the current arrangements, due to potential confusion over roles, concern that this could be seen as 'double standards' by other parents, and the fact that they would be eligible to become Chairman. This option is therefore not recommended.
16. The Headteachers also note that the Boards have not had a chance to discuss how desirable a wider scheme of parental representation is and how best this could be achieved. In the absence of such a discussion, they continue to favour the current system of co-opting parents of recent leavers on to the Boards as this achieves the object of 'parental insight' without the attendant conflicts of interest. Their concerns relate to both the disclosable pecuniary interest issue (on which they consider that almost any item of business for the Boards will have financial implications) but also wider issues around disciplinary action, pastoral care, access to sensitive information, etc. which goes beyond the ambit of any dispensation.
17. This report is also being circulated to all Members of the three Boards for consultation prior to consideration by the Policy and Resources Committee and any additional comments received will be collated and included in the papers for the July meeting (appendix 4).

Options

18. Preserving the status quo is not recommended. One option would be to formalise the current *de facto* bar on elected Members and co-opted Members serving on a Board where they have children or dependents at the School in question by amending the constitution and terms of reference for each of the Boards to make it explicitly clear that a Member in that situation is not eligible to serve. This could be achieved relatively easily through a report to the Court of Common Council, and the greater clarity would prevent any further ad hoc applications to the Standards Committee.
19. Alternatively, if Members wish to explore the option of Parent Governors further, then it is recommended that the Boards should be asked to consider in more detail whether it is in the Schools' best interests to allow parental representation. They could be asked to consider an appropriate method of appointment, and whether elected Members should be able to stand for these roles in the same way as other parents. They could also be asked to consider the appropriate remit of such a role. If the conclusions were positive, a report could subsequently be taken to the Court of Common Council seeking to amend the constitution and terms of

reference for each of the three Boards to include Parent Governors. With such a policy steer, and armed with more information, and as part of a wider framework of safeguards and constitutional changes, the Standards Committee could then be asked to develop guidelines on the granting of an appropriate dispensation to all Parent Governors. If necessary, the disclosable pecuniary interest provisions could be disapplied to contracts for education in these circumstances.

Conclusion

20. The current situation has led to some confusion about whether Members with children at one of the Schools should be permitted to serve on the Board of that School and participate in its business. It is recommended that this confusion is removed, either by making it explicitly clear that the parents of current pupils are not eligible to serve as Governors, or by exploring new arrangements for wider parental representation.

Appendices

- **Appendix 1** – *Standards Committee resolution to Policy & Resources*
- **Appendix 2** – *Constitutions of the three School Boards*
- **Appendix 3** – *Note from the Headteachers of the three Schools*
- **Appendix 4** – *Feedback from City Schools' Governors*

Background Papers

- *Policy and guidance on the granting of dispensations under the Localism Act 2011 and the Members' Code of Conduct*

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Appendix 1

TO: **POLICY AND RESOURCES COMMITTEE**

15 November 2018

FROM: **STANDARDS COMMITTEE**

5 October 2018

THE POSITION OF GOVERNORS AT CITY CORPORATION SCHOOLS

At its meeting on 5 October, the Standards Committee was disappointed that again it had to refuse a dispensation request from a City Corporation school governor who had become a parent at the relevant school. In considering the two recent similar applications, the Committee noted that as a Common Council appointment, the role of Governor of a City Corporation school was different from that of a governor in other schools and, as a consequence of the schools' constitutions, the Localism Act 2011 was applicable and consequently any governor who was also a parent had a disclosable pecuniary interest and a dispensation could only be granted if it met with the criteria set out under the Act.

It appears to the Standards Committee that it is not possible for a governor of a City Corporation school who is also a parent of a pupil at the school to fulfil the role of governor satisfactorily due to the combined impact of the schools' constitutions and the legislation. The Committee hoped that Policy and Resources Committee would consider this matter and seek a solution to it.

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Appendix 2

ESTLIN, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25th April 2019, doth hereby appoint the following Committee until the first meeting of the Court in April, 2020.
---------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

BOARD OF GOVERNORS OF THE CITY OF LONDON SCHOOL

1. **Constitution**

A Non-Ward Committee consisting of,

- one Alderman nominated by the Court of Aldermen
- up to 10 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
- the following ex-officio Members:-
 - the Chairman of the Board of Governors of City of London School for Girls
 - the Chairman of the Board of Governors of City of London Freeman's School
- up to eight co-opted non-City of London Corporation Governors with experience relevant to the Board

The Chairman of the Board shall be elected from the City Corporation Members.

2. **Quorum**

The quorum consists of any five Common Council Governors.

Any decision taken by the Board of Governors shall require the agreement of a majority of Common Council Governors present at the meeting and voting.

3. **Membership (until July 2019)**

ALDERMEN

- 2 Vincent Thomas Keaveny, Sheriff

COMMONERS

- 10 (4) Marianne Bernadette Fredericks
 7 (4) Sylvia Doreen Moys
 3 (3) Dominic Gerard Christian
 2 (2) Caroline Wilma Haines, *for three years*
 2 (2) Alexander Robertson Martin Barr
 4 (2) Keith David Forbes Bottomley, Deputy
 2 (2) Timothy Levene
 10 (2) Charles Edward Lord, O.B.E., J.P., Deputy
 10 (1) Ian Christopher Norman Seaton
 6 (1) James Michael Douglas Thomson, Deputy

together with:-

Ronel Lehmann

Lord Levene of Portsoken

Christopher Martin

Paul Madden

Rosie Gill

Paul Stein

Vacancy

Vacancy

together with the ex-officio Members referred to in paragraph 1 above.

4. **Terms of Reference**

To be responsible for:-

- (a) all School matters;
- (b) the management of the School land and buildings belonging to the City of London Corporation;
- (c) the appointment of the Head and, where appropriate, the deputies and the Bursar.

ESTLIN, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25th April 2019, doth hereby appoint the following Committee until the first meeting of the Court in April, 2020.
---------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

BOARD OF GOVERNORS OF THE CITY OF LONDON SCHOOL FOR GIRLS

1. Constitution

A Non-Ward Committee consisting of,

- up to two Aldermen nominated by the Court of Aldermen
- up to 12 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
- the following ex-officio Members:-
 - the Chairman of the Board of Governors of City of London School
 - the Chairman of the Board of Governors of City of London Freeman's School
- up to six co-opted non-City of London Corporation Governors with experience relevant to the Board

The Chairman of the Board shall be elected from the City Corporation Members.

2. Quorum

The quorum consists of any five Common Council Governors.

Any decision taken by the Board of Governors shall require the agreement of a majority of Common Council Governors present at the meeting and voting.

3. Membership (until July 2019)

ALDERMEN

- 2 Emma Edhem
- 1 Prem Goyal, O.B.E., J.P.

COMMONERS

- 4 (4) Randall Keith Anderson
- 17 (4) Tom Hoffman, M.B.E., Deputy
- 17 (4) Sylvia Doreen Moys
- 18 (3) Richard David Regan, O.B.E., Deputy
- 29 (3) Sir Michael Snyder
- 10 (2) Clare James, Deputy
- 2 (2) Robert Allen Merrett, Deputy
- 1 (1) Dhruv Patel, O.B.E., *for three years*
- 2 (2) Rehana Banu Ameer, *for three years*
- 5 (1) Nicholas Michael Bensted-Smith, J.P.
- 2 (1) Tijs Broeke
- Vacancy*

together with :-

Prof. Anna Abulafia

Dr. Stephanie Ellington

Soha Gawaly

Mary Ireland

Elizabeth Phillips

Vacancy

together with the ex-officio Members referred to in paragraph 1 above.

4. **Terms of Reference**

To be responsible for:-

- (a) all School matters;
- (b) the management of the School land and buildings belonging to the City of London Corporation;
- (c) the appointment of the Head and, where appropriate, the deputies and the bursar.

ESTLIN, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25th April 2019, doth hereby appoint the following Committee until the first meeting of the Court in April, 2020.
---------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

BOARD OF GOVERNORS OF THE CITY OF LONDON FREEMEN'S SCHOOL

1. **Constitution**
A Non-Ward Committee consisting of,
 - up to two Aldermen nominated by the Court of Aldermen
 - up to 12 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
 - the following ex-officio Members:-
 - the Chairman of the Board of Governors of City of London School
 - the Chairman of the Board of Governors of City of London School for Girls
 - up to six co-opted non-City of London Corporation Governors with relevant experience of education

The Chairman of the Board shall be elected from the City Corporation Members.
2. **Quorum**
The quorum consists of any five Common Council Governors.

Any decision taken by the Board of Governors shall require the agreement of a majority of Common Council Governors present at the meeting and voting.
3. **Membership (until July 2019)**

ALDERMEN

2 Susan Langley, O.B.E.
1 Bronek Masojada

COMMONERS

14 (4) John Alfred Bennett, M.B.E., Deputy
10 (4) Michael Hudson
7 (3) Stuart John Fraser, C.B.E.
6 (3) Graham David Packham
15 (2) Roger Arthur Holden Chadwick, O.B.E, Deputy
10 (2) Vivienne Littlechild, M.B.E., J.P.
6 (2) Hugh Fenton Morris, Deputy
10 (1) Elizabeth Rogula, Deputy
6 (1) Philip John Woodhouse, Deputy

Vacancy
Vacancy
Vacancy

together with :-
Nicholas Goddard
Brian Harris
Andrew McMillan
Chris Townsend
Lady Gillian Yarrow
Vacancy

together with the ex-officio Members referred to in paragraph 1 above.
4. **Terms of Reference**
To be responsible for:-
 - (a) all School matters;

- (b) the management of the School land and buildings belonging to the City of London Corporation;
- (c) the appointment of the Headmaster/Headmistress and, where appropriate, the deputies and the bursar.

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Appendix 3: Common councillors, parent governors and potential conflicts for Governing Boards at City Schools – a report of the Headteachers of the three City of London Independent Schools

Background

The three City independent schools have not traditionally had parent governors sitting on their boards. However, both CLS and CLSG have had in the recent past co-opted members of the governing body who were parents of recent leavers. It must be noted that such so-opted governors do not have the possibility to be elected Chairmen, therefore restricting their influence on the board.

The situation has recently arisen at both CLSG and CLSF members of the Court of Common Council who are also parents at the schools have found themselves on the board through different circumstances. As we understand it, following these members being refused dispensations by the Standards Committee, the Policy Committee were asked to consider the issue, and the heads have been asked to comment.

This paper sets out the views of the Heads on the very many implications that a policy change on this matter would entail for the schools. It must be made clear that the three Heads are unanimous in having serious reservations about allowing current parents to sit on the School Boards as members of the Court of Common Council for a number of reasons that will be detailed below.

Practice across the sector

It is common practice in state schools to have a very limited number of parent governors (and staff) on the governing body (between 2 and 4 depending on the size of the governing body). These parent governors are elected directly by other parents in a ballot and they have a limited term of service. The role of parent governors is explicitly to represent the views of parents and to act as a conduit for parental views.

Practice is not consistent across independent schools regarding parent governors. Larger, more established independent schools very rarely have current parents on their boards, whereas smaller schools (particularly prep schools) who find it harder to attract board members with relevant skills tend to draw more heavily on the parent body. It is certainly far more common to find alumni on governing bodies of larger independent schools than current parents.

Within comparable schools, the most widespread approach is the one that CLSG and CLS have so far followed: to co-opt parents of recent leavers on to the board. These parents are co-opted because of their specific skills and because of their relevant

knowledge of the organisation. The fact that their child has now left the school prevents them from having the many conflicts of interest detailed below.

Potential Conflicts

Clarity of role and legitimacy of parental representation

Because of the way this situation has arisen, the question being currently asked (should Common Council member who are parents be allowed to serve on the school boards) is in many ways the wrong one. The real question that boards should consider is whether anything has changed that would make it advisable and beneficial for school boards to include current parents, something which the schools have so far consciously refrained from doing.

Allowing Common Council member parent to sit on the board is likely to be misinterpreted by parents as the governing body wanting to create a conduit for parental views. The individual in question may find themselves seen by parents as their “go to” governor to represent their views, a situation with which they (and the Headteachers) may not feel comfortable. Many parents will also question to what extent this is legitimate representation since the parent body has not been consulted on the choice.

When it is made clear to parents that parental representation is not the intention, the governing body may well have to deal with the fallout from unmet expectations. It will be seen as cynical to argue that the governing body does not include current parents as a matter of principle but allows CC members who are parents to serve on the board. Many of our very articulate parents will rightly argue against such double standards.

It would be preferable for boards of governors to consider whether it is in the school’s best interests to allow parental representation on the board and if this is agreed, then to create a position to which current parents (whether Common Councilmen or not) can apply setting out transparent mechanisms for the process of election.

Financial conflict of interests

It would seem obvious that a parent governor would have a vested interest in discussions around school fees, staff salaries and salary increases. Indeed almost any item discussed and voted on by governors will have financial implication. Please note that such financial implications do not exist for parent governors in the state sector, where parental presence on governing bodies has been long established.

In addition, it is not impossible that a parent governor could find themselves in arrears with the school, creating a very sensitive situation for the Headteacher.

Sensitivity of Information

This is the area of greater difficulty; the amount of sensitive information that governors are privy to can create serious conflicts of interest for parent governors. For example, it would be unwise for a parent Governor to sit on a Bursary Committee as such a committee could reveal sensitive information about a family well known to the parent. The same could potentially apply to the statutory annual review of safeguarding: while discussions are always anonymised, it is not impossible for a parent governor to recognise the individuals involved. Finally, a parent Governor could have a conflict of interest regarding sensitive issues pertaining to staff, not least if the staff member taught the Governor's child.

There is no easy way to manage such conflicts other than asking the parent governor to withdraw from discussions: that inevitably limits the contribution they can make to the board, compared to other governors.

The role of governors' children

Parent Governors can become compromised through their children. This could be, for example, when a disciplinary line has to be taken with a child in the school or when there is a significant pastoral issue that arises that needs intervention. If the child in question is the governors' child, it puts the Headteacher and the board in a difficult situation.

At the same time, tensions can also arise when a Governor's child comes into conflict or tension with another child or when a child of the parent governor is privy to information that they should not have.

There is certainly a responsibility that goes with being the child of a Governor in a school regarding behaviour and that parent governors should always think of carefully before agreeing to take on the role.

Position of Chairman and Deputy Chairman

Should parents who are Common Councilmen be allowed on the school boards, there is currently nothing stopping them from becoming the Chairman and Deputy Chairman of those boards.

For the reasons outlined in the previous sections, this eventuality is fraught with difficulties and could make the relationships between Chairman and Headteacher at least very complicated and potentially untenable and would not be in the best interest of the schools.

A crucial difference with the rest of the sector

There is one final point of crucial importance.

On the rare occasions when current parents serve on the boards of independent schools, their appointment is subject to the approval of the Chair and the Head. That means that a case-by-case analysis can be undertaken in relation to any possible conflict of interests. Since elections from the Court of Common Council take place independently of the Chairman and the Head, there would be no way of controlling for such issues as have been outlined so far. If someone with appropriate skills was to be considered for a school Board who happened to be a parent, appointing them as a co-opted member allows for Board and Head to have oversight, thereby managing these issues. A change in relation to the rights of members of the Court of Common Council would remove *any* control over which parents might end up serving on the Board, thereby making the potential problems raised in this paper particularly significant.

It is the case that such controls do not exist for state schools, but the difference is there are firstly no financial implications and secondly that the appointment of parents governors is conducted as a democratic process that is fully transparent and therefore has a different legitimacy. Needless to say, the process does not stop some of the conflicts of interests described in this paper, and as many headteachers in the state sector know, careful and skilled management of such situations is often required. We would continue to argue that a recent former parent is the best way to ensure input from the parental body without any conflicts of interest.

Conclusion

Lifting restrictions for Common Councilmen who are current parents to serve on the boards of the independent schools is not a step that should be taken lightly. The Heads of the schools are not in favour for the reasons outlined in this paper. The potential for conflict of interest is significant and should not be underestimated if the best interest of the schools are to be prioritised.

The Boards have not had the chance to discuss how desirable parental representation is and how best to achieve it. However, it appears that the current system of appointing parents of recent leavers achieves the objectives of having “parental insight” on the board without the conflicts of interest that current parents cannot avoid. In the absence of such a discussion, it would be best to retain the current system.

Appendix 4: Feedback from the City Schools' Boards of Governors

Below is the anonymised collection of feedback on the Parent Governor report submitted to Policy & Resources for 4 July 2019. Responses were received from Governors of all three City Schools.

Number	Comment
1	<p>Where there is a conflict of thought on the Board it is the wishes of the Headteachers that should take priority. They are the ones most likely to be compromised in an adverse situation and I feel their paper is very well balanced and thought through.</p> <p>There are plenty of other schools in the City of London Family that CC's could approach to join a governing body if they are committed to the role.</p>
2	<p>I think we should reflect best practice in other schools and allow parental representation subject to non-involvement where there is financial interest (i.e. fees). I think we should not overly complicate process but look at the right outcome and then ensure it is possible with appropriate governance.</p>
3	<p>My conclusion is that a Common Councilman who happens to be a parent becoming a Common Councilman Governor is an untenable position.</p> <p>That's not to say parents should not be able to have an input - there are recognised parent groups - (at CLSG it's the Friends) and we have two examples on CLSG Board of former parents appointed as Co-Opted Governors, one of whom was a teaching practitioner and who made a hugely valuable contribution to the board over circa 9 years and the current one being a fund raising expert helping us with our current bursary appeal/targets. Involvement of former parents and indeed former pupils can continue to be accessed via the Co-Opted Governor route.</p>
4	<p>Appendix 3 'Report of the Headteachers of the three City of London Independent Schools' states the following 'The role of parent governors is explicitly to represent the views of parents and to act as a conduit for parental views'. My experience is that this is not the role of a Parent Governor. Governor Induction training courses run by the National Governors Association make it very clear to all Governors that they are appointed to the Governing Body, not to represent any other interest or Community Group. In effect the concept is that the Parent Governor appointment, together with Community Governor appointments, or Partnership Appointments are to bring balance and diversity of skills and experience from divergent stakeholders. The Parent Governor is appointed to the Governing Body based on the Nolan principles of public life, and together with the rest of the Governing Body act as a 'critical friend' to the Head Teacher/Senior Leadership Team. They do not, and should not act as a conduit for parental views, which are handled by the Leadership team via normal governance channels.</p>

	<p>Financial conflicts of interest also exist in State Schools where they are carefully managed, alongside Safeguarding, and other sensitive information. In the School where I was Chairman we asked all parents to voluntarily contribute on a monthly basis to our school fund which over time helped with purchases for the School, such a School minibuses, Sports hall equipment etc. In the State Sector it is illegal to ask for payment for education, but voluntary contributions of this nature are allowable - on average half of parents contributed throughout their child's time at the school. I give this example as these type of sensitive matters also exist elsewhere. Another example in the selective environment would be in relation to selective school admission tests where potential conflicts have to be managed. In addition, even if the state sector the concept of bursaries exist as 'school fund' monies are used for hardship cases to help parents with the cost of school uniform, books, computers etc. All again handled with great sensitivity.</p> <p>The core of the debate here is that this concept differentiates 'Parent Governors' from any other type of Governor. All Governors are appointed to the Governing Body on an equal basis who fulfil their fiduciary duties on a collective basis. In my experience, the pool of experience in the Parental stakeholder group can prove fruitful. Election of Governors can be managed by the Chair of the Governing Body outlining what skill set is required for the Governing Body vacancy, (Digital, Financial, etc. and asking for nominations which meet the identified skill set as identified by a skills matrix) A process could then be that there is either an election by parents, or interviews conducted by the Chair of Governors and Head Teacher.</p>
5	<p>I have experience of parent governor elections to State Schools where, as you write, there is no financial implication. However, in my experience, rarely is a parent governor 100% independent. There is often a reason why that parent stood for election and, when their child leaves that school, the parent governor quickly disappears too.</p> <p>If P & R want to go down the road of demolishing the current structure of governing boards of City Schools, then as well as parent Governor appointments, we shall need to have Staff governors, not only teachers, but also admin/support. I already have one of my City Schools bending my ear back that teachers should be represented on Board,</p> <p>I am very much opposed to the Conclusion of the paper for P & R on 4 July, in the first sentence. It must be made explicitly clear that the parents of current pupils are not eligible to serve as governors'</p>

**Excerpt from the minutes of the Policy and Resources Committee's meeting held
4 July 2019**

8. THE CITY OF LONDON CORPORATION'S INDEPENDENT SCHOOLS AND PARENT GOVERNORS

The Committee considered a joint report of the Town Clerk and the Comptroller & City Solicitor concerning the management of the City Corporation's three independent schools and the extent to which the parents of current pupils could and should be able to serve as Governors.

During discussion, a wide range of views were expressed in respect of the suitability of Members with children at the School serving as Governors, with comparisons drawn to the situation at other independent schools. The benefits that such Members might bring through their particular experience as parents was noted, as was the increased likelihood of a more active involvement with the daily business of the School. Equally, the challenges of managing conflicts of interest were noted.

The Comptroller & City Solicitor provided clarity in respect of the current position, confirming that such Members were currently eligible to serve as Governors. However, the decision taken by the Court of Common Council to apply the provisions associated with local government legislation to all areas of the Court's business meant that such parent Governors would have an engaged pecuniary interest through their contract with the School in respect of the child's education. The affected Member would, therefore, be so conflicted as to severely limit their ability to participate in the majority of business before the relevant Board of Governors. This was at odds with the position at other independent schools. Members would, therefore, need to make a decision in respect of the continued application of local government rules and the provisions of the Localism Act to the business of the independent schools.

Following further debate, the Town Clerk urged caution in respect of unpicking the current arrangements in respect of local government legislation and its application through the Code of Conduct in isolation. It was suggested that the implications of such a step should be considered in the round and that this should, therefore, be looked at as part of the forthcoming governance review. Members agreed that this would be prudent.

RESOLVED: That the parents or guardians of any child currently studying at the City of London School, the City of London School for Girls or the City of London Freeman's School should continue to be eligible to sit on the Board of Governors for that School; subject to the current provisions of the Code of Conduct and pending the outcome of a review into the application of local government legislation to non-City Fund areas of the City Corporation's activity.

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Committee(s)	Dated:
Standards Committee	4 October 2019
Subject: Declaration of Gifts and Hospitality in relation to the special provision made for the Lord Mayor and Shrevialty as Ceremonial Office Holders	Public
Report of: Executive Director, Mansion House and Central Criminal Court Report Author: Vic Annells	For Information
<p style="text-align: center;">Summary</p> <p>To update the Committee on the Lord Mayor and Shrevial declaration of gifts and hospitality for the year 2018/19.</p> <p style="text-align: center;">Recommendation(s)</p> <p>Members are asked to note the report.</p>	

Main Report

Background

1. Following the meeting of Standards Committee on 20th February 2015 it was agreed that as of 1st April 2015 gifts and hospitality which breached the threshold, as applied to all Members, would be declared unless they fell within the caveat outlined within the previous report of 'special provision' for the Lord Mayor and Shrevialty as ceremonial office holders.
2. The last report on gifts and hospitality was made to the Committee at its meeting in October 2018.

Current Position

3. Since the last report, the Lord Mayor has made declarations at broadly three monthly intervals, declaring gifts and hospitality publicly via the internet page - <http://www.cityoflondon.gov.uk/about-the-city/the-lord-mayor/Pages/default.aspx> The gifts and hospitality are detailed on separate documents.
4. Members will be aware that the Shrevialty commences in September 2018, therefore, the attached appendices summarise the Shrevial year of Alderman and Sheriff Vincent Keaveny and Sheriff Liz Green.
5. The Lord Mayor and Shrevialty have no separate declarations to make to the Committee under the special provision. All gifts and hospitality have been declared in the attached appendices.

Appendices

- Appendix 1 - Gifts – Lord Mayor, November 2018 to January 2019
- Appendix 2 - Gifts – Lord Mayor, February 2019 to April 2019
- Appendix 3 - Gifts – Lord Mayor, May 2019 to July 2019
- Appendix 4 – Gifts - Shrevial, September 2018 to July 2019

- Appendix 5 – Hospitality – Lord Mayor, November 2018 to April 2019
- Appendix 6 – Hospitality – Lord Mayor, May 2019 to August 2019
- Appendix 7 – Hospitality – Shrevial, September 2018 to August 2019

- Appendix 8 – Overseas Hospitality – Lord Mayor, Overseas December 2018 to September 2019

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DECLARATION OF GIFTS - LORD MAYOR (ESTLIN)
9th November 2018 to 31st January 2019

Gift	Donor	Date received	Did LM GIVE gift at the time of receipt?
Visitors' Book	International Bankers' Company	09.11.2018	No
Claret Jug	Ironmongers' Company	09.11.2018	No
School Cup	King Edward's School, Witley	09.11.2018	No
Membership Card for London Youth Zones and framed photo	The Young Members of Onside Youth Zones	09.11.2018	No
Engraved silver photo frame	Chartered Accountants' Company	09.11.2018	No
Watercolour painting	Trust for London	09.11.2018	No
Book and Donation	Educators' Company	09.11.2018	No
Luggage Labels	Guild of Human Resources	09.11.2018	No
Hamper of Groceries	Farmers' Company	10.11.2018	No
Football	Nigerian Bank	10.11.2018	No
Bible	Dean of St Paul's	11.11.2018	No
Ceremonial Hat	Feltmakers' Company	13.11.2018	No
Books: History of the HAC and Reflections of a Regiment, The Great War in Pictures	HAC	13.11.2018	Yes
Whittington Silver Spoon	Mercers' Company	13.11.2018	Yes
Tommy Silhouette	Steve Sherry, CE, RBL Industries	15.11.2018	No
Watercolour of Grocers' Camel	Grocers' Company	15.11.2018	Yes
Coleman Street Ward Street Sign	Mark Grove	16.11.2018	No
Model of coopered cask and bottle of Coopers' Whisky	Coopers' Company	16.11.2018	Yes
Book: Island Poké Cookbook by James Gould Porter	In Bow Lane at Switching on of lights	20.11.2018	No
Book: Grasp the Solution by Chris Griffiths	Chris Griffiths, Wales	22.11.2018	Yes
Bottle of Penderyn Welsh Whisky	Welsh Government, Jeremy Miles AM	22.11.2018	Yes
Photographs of Aldermen	Mike Williams - Photographer	26.11.2018	No
Cake	Bakers' Company	26.11.2018	Yes
Hermes Tie	Amin Bilal	27.11.2019	No
Book: Frida Kahlo	HE The Mexico Ambassador	27.11.2018	Yes
Box of teas	Mr Yuan Chen, President of the China Association for International Friendly Contact	27.11.2018	No
Silver coloured ball point pen engraved	Gold and Silver Wyre Drawers' Company	27.11.2018	Yes
Illuminated Oath	Queen's Remembrancer	28.11.2018	
Boar's Head	Butchers' Company	28.11.2018	No
Quill Pen / Foundation Pen	Scriveners' Company	29.11.2018	Yes
Singapore Tea set	Dr Yuhyan Park	30.11.2018	Yes
Silver photo-frame	Guild of Freeman	30.11.2018	No
Royal London Yacht Club 175th Anniversary Book	Royal London Yacht Club	03.12.2018	No
Pack of playing cards	Makers of Playing Cards' Company	06.12.2018	Yes
2019 Calendar	Ministry of Foreign Affairs of Japan	10.12.2018	No
Book - Frida Kahlo	Banco Mexico (Central Bank of Mexico)	13.12.2018	Yes
Silver Dagger	HE The Ambassador of Kuwait	18.12.2018	Yes

Gift	Donor	Date received	Did LM GIVE gift at the time of receipt?
4+4 prs gloves	Glovers' Company	18.12.2018	No
Wooden lattice bell from St Paul's	Turners' Company	18.12.2018	Yes
Blue/green ceramic vase	HE The Ambassador of South Korea	19.12.2018	No
Bottle of Hankey Bannister	HE The Ambassador of Thailand	19.12.2018	No
Model of air plane (Hannibal - Handley Page HP42-E)	Mr Alex Cruz, British Airways 100	19.12.2018	No
Bottle BRL Chairman's Choice Single Malt Whisky from the Glendullan Distillery	Mr Terry Whittles, Chairman, Royal British Legion	20.12.2018	No
Basket of Groceries	HE The Ambassador of Iraq	20.12.2018	No
Large box of chocolates	HE The Ambassador of UAE	20.12.2018	No
Small red and white model aeroplane, model van and AI car	Mr Li Haiwei from JD.com	20.12.2018	No
Hamper	Reignwood UK	21.12.2018	No
Book	HE The Canadian High Commissioner	21.12.2018	No
Hexagon Box of Turkish Delight	HE The Ambassador of Turkey	24.12.2018	No
Bottle of Johnnie Walker Black Label Blended Scotch Whisky	The Deputy High Commissioner of India	24.12.2018	No
Box of tea from Ette Tea Company	HE The High Commissioner for Singapore	24.12.2018	No
Bottle of Indian Whisky	HE The High Commissioner for India	03.01.2019	No
Beehive in Uganda	Wax Chandlers' Company	10.01.2019	Yes
NRSV Bible	City Deanery Synod	10.01.2019	No
2 Dartington Wine Glasses, engraved	Dyers' Company	10.01.2019	Yes
Photo Album to be filled over the year.	Richard Smith from Sharp Photographers	10.01.2019	No
Model Dhow and Book: History	Kuwait Finance Minister	13.01.2019	Yes
Model Dhow and Book: History	National Bank of Kuwait	13.01.2019	Yes
Decorative bowl	Gatehouse Bank, Kuwait	13.01.2019	Yes
Books: History, and Calendar	Sheikh Mubarak al Sabah, Kuwait	13.01.2019	Yes
Book: History	HSBC, Kuwait	14.01.2019	No
Glass model dhow	Kuwait Banking Association	14.01.2019	Yes
Glass Ornament	Deloitte, Dubai	15.01.2019	No
Book: History	CEO, Etihad Credit Agency, Dubai	15.01.2019	Yes
Silver Salver and brooch	Coleman Street Ward Club	17.01.2019	No
Book: Men of Metal, a Company History	Armourers and Brasiers' Company	18.01.2019	Yes
Paperweight and scarf	TMW Fintech from India	22.01.2019	No
Cow Bell	Mayor of Morzine	25.01.2019	Yes
Limited Edition Tie	Dr Hamad Al Suwaid from UAE	28.01.2019	No
Honorary Degree DSc	City, University of London	29.01.2019	No
Book: State Bank of India and Historic Buildings in India	State Bank of India	30.01.2019	Yes

DECLARATION OF GIFTS - LORD MAYOR (ESTLIN)
1st February to 30th April 2019

Gift	Donor	Date received	Did LM GIVE gift at the time of receipt?
Box of chocolates	William Curley	06.02.2019	No
Book: The Governance of China Part I and II	HE The Ambassador of China	08.02.2019	No
Hangul Lacquer Ware Jewellery Box and small promotional photo book.	Vice Finance Minister, Seoul	12.02.2019	Yes
Small green wallet, small porcelain container with rouge, small painted stone	Chairman of the Financial Services Commission, Seoul	12.02.2019	Yes
2 wooden tea cups and saucers	Governor of the Financial Supervisory Services, Seoul	12.02.2019	Yes
2 Small Glasses in presentation box, Tokyo 2020 t-shirt	Governor Koike, Tokyo	14.02.2019	Yes
Model of Hong Kong Star Ferry	Mr Paul Chan, Financial Secretary, Hong Kong	18.02.2019	Yes
Small leather credit card wallet	OCBC, Singapore	21.02.2019	Yes
Silk screen	Finance Minister of Nepal	22.02.2019	No
Kashmir Scarf	Finance Minister of Nepal	22.02.2019	No
Silver Coaster	City Livery Club	26.02.2019	No
Coin in presentation wooden box	President of Slovenia	01.03.2019	Yes
Book: History of the Company	Edinburgh Company of Merchants	04.03.2019	Yes
Book: Compendium of Malt Whisky	John McElwee from Edinburgh	05.03.2019	Yes
Silk screen	HE The Ambassador of Nepal	13.03.2019	No
Silk scroll in brown envelope	R5X stakeholder, Shenzhen	18.03.2019	Yes
Small framed print of a horse: book on Shenzhen	Mayor of Shenzhen	18.03.2019	Yes
Fan and tea in gift box	Wang Qunbin, Fosun International, Shanghai	19.03.2019	Yes
Framed Certificate of launch of Cloth Link programme	Lujiazui Financial City, Shanghai	19.03.2019	No
Porcelain Picture - green and white design	Mayor of Shanghai	20.03.2019	Yes
Sunburst design painted on plate	Mr Geo Guofo, Group Chairman, Shanghai Pudong Development Bank	20.03.2019	Yes
Book on The Bank of China	President and Mr Sun Yu, Bank of China	21.03.2019	Yes
Yellow and red stuffed "cow"	Headmaster of School, Beijing	21.03.2019	No
Magnum of Gin	Cotswolds Distillery, Dan and Katia Szor	21.03.2019	No
Certificate of visit to Creditease,	Creditease	22.03.2019	Yes
Pen and USB stick from The Palace Museum	UK-China Green Technology Investment Gateway	23.03.2019	No
Silk Book of Stamps	Mayor of Beijing, Chen Jining	23.03.2019	Yes
Book: Upscale	Ms Parveen Dhanda – Head of Programmes & Late Stage, Tech Nation	26.03.2019	No
Mug and 2 coasters	Treloar	27.03.2019	Yes
Brown coloured heavy bud vase	China Development Bank	28.03.2019	Yes
Silver butter knife with flowers handle and commemorative coin	Governor of Western Australia	29.03.2019	No
Leather document case	Leathersellers' Company	02.04.2019	Yes

Gift	Donor	Date received	Did LM GIVE gift at the time of receipt?
Hand crafted framed picture	HE The High Commissioner of Bangladesh	04.04.2019	No
Promotional zip bag of bags	Bank of East Asia	04.04.2019	No
Book on Istanbul	Turkey Wealth Fund	07.04.2019	No
Glass Gavel	Borsa Istanbul	08.04.2019	Yes
Glass Dish	Secretary General, TUSIAD	08.04.2019	Yes
Sand Dune Tower with Clock and Upper Oryx with Silver Base	HH The Amir of Qatar	10.04.2019	Yes
Marble commemorative ornament	Qatar Financial Centre	10.04.2019	Yes
100: Bank of East Asia: A Century of Innovation, Progress and Commitment 1919 - 2019	Bank of East Asia	15.04.2019	No
Pewter Jug	Pewterers' Company	15.04.2019	Yes
Packet of coffee	HE The Ambassador of Honduras	23.04.2019	No
2 Champagne flutes, engraved	Fuellers' Company	24.04.2019	Yes
Carpet	Governor of Central Bank, Qatar	30.04.2019	No
The Dinner Book of the London Drapers' Company	Drapers' Company	30.04.2019	No
MOET	Andrea Eccles	30.04.2019	No

DECLARATION OF GIFTS - LORD MAYOR (Estlin)
1st May to 31st July 2019

Gift	Donor	Date received	Did LM GIVE gift at the time of receipt?
Champagne & Truffles	Kathryn and Charlie	02.05.2019	No
2 Bottles of wine	Charlie Holland	02.05.2019	No
Painting by Samar Albader, Large Chinese antique blue/white dish, selection of 9 books on Islamic Art and Craft in the Al Sabah Collection	HE Sheikh Nasser, First Deputy Prime Minister and Minister of Defence, Kuwait	02.05.2019	Yes
Book: History of the Company	Brewers' Company	02.05.2019	Yes
Basket of Fruit and flowers	New Spitalfields Market Tenants' Association	03.05.2019	Yes
Wine, Coffee beans, Earl Black tea, Whiskey, Coffee, Green tea	HE Ambassador of Nepal	07.05.2019	No
Book: Trekking Colombia	HE The President of Colombia	07.05.2019	Yes
Book: Goldwork and Shamanism	Governor, Bank of Colombia	07.05.2019	Yes
Pack of coffee and Book: Trekking in Colombia	Brigard & Urrutia, Colombia	07.05.2019	No
3 Bags Coffee Beans and Book: Brazil visto docen (photos of Brazil)	Sao Paulo Stock Exchange	08.05.2019	Yes
Set of playing cards (Concorde)	Makers of Playing Cards' Company	09.05.2019	No
Doughnuts	Master Baker	13.05.2019	No
Brown china tea set	Bank of China Video Team	21.05.2019	No
Salt and pepper dishes on wooden stand by Gordon Robertson	Pewterers' Company	21.05.2019	No
Silver Gild Key	Security Professionals' Company	24.05.2019	Yes
Jar of Honey and Wooden cased watch	Mayor of Tallinn	27.05.2019	Yes
Bottle of Finnish Gin	Mayor of Helsinki	28.05.2019	Yes
Book: "Wonders beyond Numbers" about Maths - Johnny Ball	Actuaries' Company	30.05.2019	Yes
Book: History of the Company	Feltmakers' Company	05.06.2019	Yes
Framed photo of Master's Certificate Ceremony	TT Barton - CLG	10.06.2019	No
Apples to commemorate Queen Elizabeth II's birthday	Ambassador of Korea to the UK	10.06.2019	No
Books: selection of soft backs	President, Islamic Development Bank	11.06.2019	Yes
Book: 200 years of UK Singapore Relations, Modern picture of Singapore House Fronts; bag of edibles	Singapore Minister Tharman	13.06.2019	No
Water Bottle	Barclays Rise	14.06.2019	No
Blue flowers on white porcelain vase (12") on black pedestal.	Vietnamese Finance Minister	04.07.2019	Yes
Red perspex plaque	ACCA, Jakarta	10.07.2019	No
Black framed and mounted silver wire picture	Bank Mandiri, Jakarta	11.07.2019	Yes

Gift	Donor	Date received	Did LM GIVE gift at the time of receipt?
Chinese Stock Certificate	Shanghai Stock Exchange	12.07.2019	Yes
Book of Chinese stamps	Fosun Group	12.07.2019	Yes
Hangzhou Silk Wall hanging	Vice Governor, Hangzhou	13.07.2019	Yes
Box set of porcelain cups on gold coloured base	Hu Chunghua, Vice Premier of the State Council, PR China	17.07.2019	Yes
Raffia vase	President of Colombia	18.06.2019	Yes
Bottle: "Ancestral"	Cass Business School	18.06.2019	No
Dow Plaque on wooden plinth for 120th; Gold British house in Kuwait in frame; Set of HMQ Coronation Stamps in Kuwait: booklets	HE Sheikh Mohammad Abdulla Al-Sabah from Kuwait	19.06.2019	Yes
Mug	Canadian Association of Alternative Assets and Strategies, Toronto	25.06.2019	No
Bottle of Gin, maple syrup, T-shirt	Fintech Growth Syndicate, Toronto	25.06.2019	No
Book and Chocolates; 1871 Framed plaque	Mayor of Chicago	26.06.2019	Yes
Coffee; bamboo straws	CNN Indonesia Journalist	03.07.2019	No
Paperweight and Glass Tankard	Billingsgate Market	05.07.2019	Yes
Small pewter horse and cart	Carmen's Company	17.07.2019	No
Set of Lake Havasu Coins	Arizona Students	18.07.2019	Yes
Book: Livery Halls of the City of London	Chartered Architects' Company	19.07.2019	No
Bottle of Wine "Sir Ian Botham" - shiraz Boroza Valley	The Cook Society	19.07.2019	No
Book on Zhejiang	Department of Foreign Affairs, People's Government of Zhejiang Province, PR China	19.07.2019	No
Jug with silver collar	Water Conservators' Company	22.07.2019	No
Book: History of the Company	Gun Makers' Company	22.07.2019	Yes
Mug and Book	Brigantes Breakfast	25.07.2019	Yes
Inscribed silver Pen Knife and metal silhouette of elephant	Cutlers' in Hallamshire	26.07.2019	Yes
Box of helmet chocs.	McLaren	26.07.2019	Yes
100 Year Anniversary Book	British Airways	31.07.2019	No

DECLARATION OF GIFTS - SHRIEVALTY (KEAVENY & GREEN)
September 2018 to July 2019

Gift	Donor	Recipient
Gloves	Glovers' Company	SHs
Reformed Characters' book	Reform Club	SH1
Whisky and tea set	Silk Road Rally	SH2
FWK - visitors' book, Farmers' - fountain pen, Walbrook Ward Club - fruit bowl (glass), City Livery Club - silver and woode bottle	Presentation of addresses	SH2
Silver salver	London Solicitors'	SH1
Silver picture frame	Guild of Freeman	SH1
Visitors book	Farringdon Ward Club	SH1
British wool duvet, mattress topper and two pillows	Woolmen's	SH1
Wool fabric for a suit	Woolmen's	SH1
Wine coaster	City Livery Club	SH1
Hand tied flower arrangements given to each lady	Leadenhall Market	SH2 & C1
Fan Makers' Company book	Fan Makers' Company	C1 & C2
A book	Inspiring Leadership Trust	SH1
Double pack of playing cards	Makers of Playing Cards	SHs & Cs
Silk scarves	Fan Makers' Company	C1, SH2
Book	Fan Makers' Company	SH1
Book	Cordwainers Ward	SH1
A basket of chocolates and sweets	Embassy of Qatar	SH1
Glassware	Dyers' Company	SH1, SH2
2 engraved champagne glasses given	Fuellers' Company	SH2 & C2
Leatherbound needle set	Needlemakers' Company	SH2, C1
A quill pen in a presentation case and a fountain pen	Scriveners' Company	SHs

Gift	Donor	Recipient
A pen holder/small vase	Fruiterers' Company	SHs & Cs
A small china bowl	Gardeners' Company	SHs & Cs
Basketmakers' book	Basketmakers' Company	SH2
Bottle of Raven port	Yeoman Warders	SH2
Two mugs and four coasters	Treloar Trust	SHs
Roots and Branches book	Drapers' Company	SHs
A small silver coloured dish	Drapers' Company	Cs
A pair of gloves	Glovers' Company	SHs
Books on the history of the Apothecaries	Apothecaries	SH1 & C2
Apothecaries Scarf	Apothecaries	SH2 & C1
Johnstons of Elgin wool scarf	Woolmen's Company	SH2
Salt and pepper pots	Frisian Isles Delegation	SH2
Hand-made Gloves	Framework Knitters'	SH2
Little wooden pot	Turners' Company	SH2

DECLARATION OF HOSPITALITY
Lord Mayor – Peter Estlin

09th November 2018 – 30th April 2019

DATE	EVENT	LOCATION
13/11/2018	Gresham Dinner of Mercers (LM, SH1, SH2)	Mercers' Hall
14/11/2018	Carpenters' Company Dinner (LM, SH1, SH2)	Carpenters' Hall, Throgmorton Avenue, London, EC2N
15/11/2018	Grocers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Grocers' Hall
16/11/2018	Coopers' Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
19/11/2018	Coleman Street Ward Club Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
21/11/2018	Stationers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Stationers' Hall
26/11/2018	Bakers' Company Banquet (LM, SH1, SH2)	Egyptian Hall
27/11/2018	Gold and Silver Wyre Drawers' Company Dinner (LM, LMS, SH1, SH2, C1)	Egyptian Hall
28/11/2018	Educators' Company Dinner (LM, LMS, SH2, C2)	Egyptian Hall
05/12/2018	Cutlers' Company Boar's Head Feast (LM, LMS, SH1, SH2, C1, C2)	Cutlers' Hall, Warwick Lane, London, EC4
06/12/2018	Makers of Playing Cards Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
10/12/2018	Bloomberg Dinner (RLM – Alderman Sir Alan Yarrow)	Long Parlour
10/12/2018	Guild of Freeman Banquet (LMLT – Alderman Ian Luder, SH1, SH2, C1)	Guildhall
13/11/2018	Fan Makers' Company Dinner (LMLT - Alderman Sir Andrew Parmley, SH1, SH2, C1, C2)	Egyptian Hall
18/12/2018	Turners' Company Livery Dinner (LM, SH1, SH2, C2)	Saddlers' Hall
19/12/2018	Royal Society of St George Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
20/12/2018	British Red Cross Concert and Dinner (LM, LMS, SH1, SH2, C1, C2)	St Paul's Cathedral
08/01/2019	Lord Mayor's Annual Gresham Lecture and Dinner inc travel (LM, LMS, SH1, SH2, C1, C2)	Guildhall
09/01/2019	Dyers' Company Dinner (LM, SH1, SH2)	Leathersellers' Hall
17/01/2019	Garrick Dinner with HM Judges (LM, LMS, SH1, SH2, C1, C2)	Garrick Club, 15 Garrick St, London WC2E 9AY
18/01/2019	Armourers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Armourers' Hall, 81 ColemanStreet, London, EC2
23/01/2019	ASEAN Dinner (LMAR - Alderman Nicholas Lyons)	House of Lords
29/01/2019	Livery Academy Awards (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall

30/01/2018	TheCityUK Annual Dinner inc travel (LM, SH1, SH2)	Plasterers' Hall, One London Wall, London, EC2Y 5JU
01/02/2019	HAC Mess Club Dinner (LM, LMS, SH1, SH2)	Honourable Artillery Company, Armoury House, City Road, London, EC1
04/02/2019	Needlemakers' Company Dinner (LM, LMS, SH1, SH2, C1 & C2)	Egyptian Hall
06/02/2019	Ironmongers' Company Dinner (LM, SH2)	Ironmongers' Hall, Barbican, London
07/02/2019	Skinners' Company Dinner (LM, LMS, SH2, C2)	Skinners' Hall, Dowgate Hill, London, EC4
07/02/2019	Co-operation Ireland Dinner (RLM – Alderman Sir David Wootton, SH1, C1)	Egyptian Hall
11/02/2019	Arts Scholars' Company Banquet (LMLT – Alderman Sir Andrew Parmley)	Clothworkers' Hall
11/02/2019	Abu Dhabi Sovereign Wealth Fund (Mubadala) Private Dinner (Alderman William Russell)	Private Dining Room
13/02/2019	Fruiterers' Company Dinner (LMLT – Alderman Sir David Wootton, SH1, SH2, C1, C2)	Egyptian Hall
15/02/2019	Gardeners' Company Dinner (LMLT – Alderman Sir Roger Gifford, SH1, SH2, C1, C2)	Egyptian Hall
18/02/2019	Dinner for the Mayor of Chicago (LMLT – Alderman Charles Bowman)	Long Parlour
25/02/2019	Mencap Fundraising Dinner (RLM – Alderman Sir Alan Yarrow, SH2, C2)	Salon
27/02/2019	International Bankers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
05/03/2019	Haberdashers' City Livery Dinner (RLM – Alderman Sir Andrew Parmley)	Haberdashers' Hall
05/03/2019	Solicitors' Company Dinner (RLM – Alderman Sir Alan Yarrow, SH1, C1)	Egyptian Hall
06/03/2019	Guildhall Lodge Meeting and Dinner (RLM – Alderman Sir David Wootton)	Egyptian Hall
08/03/2019	Cordwainers' Company Dinner inc travel (LM, LMS, SH1, SH2, C1, C2)	Clothworkers' Hall
11/03/2019	Guild of HR Charity Banquet (LM, LMS, SH1, SH2, C1, C2)	Fishmongers' Hall
11/03/2019	University of Bristol Alumni Awards (LM, LMS)	Egyptian Hall
13/03/2019	Carmen's Company Dinner (RLM – Alderman Ian Luder)	Egyptian Hall
15/03/2019	Masons' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
18/03/2019	Plumbers' Company Dinner (LMLT – Alderman Ian Luder)	Egyptian Hall
19/03/2019	CISI Dinner 2019 (LMLT – Alderman Sir Alan Yarrow)	Long Parlour
26/03/2019	Future Fifty Dinner (LM)	Salon
01/04/2019	City, University of London Rector's Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
02/04/2019	Leathersellers' Company Dinner (LM, SH1, SH2)	Leathersellers' Hall
03/04/2019	Clothworkers' Company Dinner (LM, LMS, SH1, SH2, C1)	Clothworkers' Hall, Mincing Lane, London, EC4
03/04/2019	Carers Trust Reception and Dinner (RLM – Alderman Sir Andrew Parmley)	Old Ballroom / Long Parlour
04/04/2019	Insurers' Company 40th Anniversary Dinner (LM, LMS, SH2, C2)	Egyptian Hall

05/04/2019	Scriveners International Union of Notaries Dinner (LM, LMS, SH1, C1)	Egyptian Hall
12/04/2019	Environmental Cleaners' Dinner (RLM – Alderman Sir David Wootton, SH1, C1)	Egyptian Hall
15/04/2019	Pewterers Company Dinner inc travel (LM, LMS, SH1, SH2, C1, C2)	Pewterers' Hall, Oat Lane, London, EC2V 7DE
23/04/2019	Royal Society of St George 125 Anniversary Banquet (LM, LMS, SH2, C2)	Guildhall
25/04/2019	Qatar Day VIP Dinner (LM)	Guildhall
25/04/2019	Chartered Secretaries and Administrators' Company Banquet (RLM – Alderman Alan Yarrow, SH1, SH2, C1)	Egyptian Hall

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DECLARATION OF HOSPITALITY
Lord Mayor – Peter Estlin

01th May 2019 – 31st August 2019

DATE	EVENT	LOCATION
08/05/2019	Interfaith Iftar Dinner (Representing the Lord Mayor: Alderman Tim Hailes)	Guildhall
09/05/2019	London International Disputes Week Gala Dinner (LMLT – Alderman Sir David Wootton)	Egyptian Hall
14/05/2019	Furniture Makers' Company Dinner (LM, LMS, SH1, C1)	Egyptian Hall
17/05/2019	Blacksmiths' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
20/05/2019	Arbitrators' Company Dinner (RLM – Alderman Sir Alan Yarrow, SH1, SH2, C1, C2)	Egyptian Hall
20/05/2019	RHS Chelsea Flower Show Charity Gala Dinner (LM, LMS)	The Royal Hospital Chelsea, London SW3 4SR, England
21/05/2019	Festival of The Sons of The Clergy Dinner (SH2, C2)	Merchant Taylors' Hall
22/05/2019	Wheelwrights' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
23/05/2019	Ironmongers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
24/05/2019	Bridewell Royal Hospital Fundraising Dinner (LM)	Egyptian Hall
30/05/2019	Actuaries' Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
31/05/2019	Farriers Company Banquet (LM, LMS, SH2, C2)	Egyptian Hall
03/06/2019	State Banquet given in honour of the President of the United States of America (LM, LMS)	Buckingham Palace
04/06/2019	Barclays Japanese Client Dinner (LM)	Old Ballroom
05/06/2019	Coachmakers' Company Banquet (RLM – Alderman Sir Andrew Pamley)	Guildhall
05/06/2019	Feltmakers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
06/06/2019	Vintners' Company Dinner (LM, LMS)	Vinters' Hall
06/06/2019	Loriners' Company Banquet (RLM – Alderman Sir Alan Yarrow, SH2, C2)	Egyptian Hall
10/06/2019	Institute of Directors City of London Branch Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
12/06/2019	Save the Children Fund Summer in the City Dinner (LM, LMS)	Plasterers' Hall
13/06/2019	Gresham 500th Anniversary Lecture and Dinner (LM, LMS, SH1, SH2, C1, C2)	Guildhall
13/06/2019	TeachFirst Dinner (RLM – Aldermen Sir David Wootton)	Plasterers Hall
17/06/2019	Barbers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Barber Surgeons Hall
18/06/2019	China Construction Bank Dinner (LM)	Private Dining Room, MH
21/06/2019	Apothecaries' Society Dinner (SH1, SH2, C1, C2)	Apothecaries' Hall, Black Friars Lane, London EC4V 6EJ

24/06/2019	Curriers' Company Dinner (SH1, SH2, C1 & C2)	Leathersellers' Hall
27/06/2019	Glaziers' Company Dinner (LMLT – Alderman Sir Roger Gifford, SH1, SH2, C1, C2)	Egyptian Hall
01/07/2019	Green Finance Summit Dinner (LM)	Egyptian Hall
04/07/2019	Information Technologists' Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
05/07/2019	Girdlers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Girdlers' Hall
05/07/2019	Lightmongers' Company Dinner (RLM – Alderman Sir Andrew Parmley)	Egyptian Hall
08/07/2019	City Livery Club Dinner (LMLT – Alderman Sir David Wootton, LMS, SH1, SH2, C1, C2)	Egyptian Hall
09/07/2019	125th Anniversary of the Bar Council Reception and Dinner (LMLT – Alderman Sir David Wootton, SH2)	Guildhall
10/07/2019	Tin Plate Workers' Company Installation Banquet (SH1 representing LM – Alderman and Sherriff Vincent Keaveny, C1, SH2)	Egyptian Hall
15/07/2019	India Day VIP Dinner (LM, SH1)	Guildhall
17/07/2019	Chartered Accountants' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
19/07/2019	Guild of Young Freemen Banquet (LM, LMS)	Charterhouse
20/07/2019	Wills Hall Association Dinner (LM, LMS)	Wills Hall, Bristol
24/07/2019	Marketors' Company Banquet (RLM – Alderman Sir David Wootton, SH1, SH2, C1, C2)	Egyptian Hall
26/07/2019	Cutlers' in Hallamshire Forfeit Feast (LM, LMS, SH1, SH2, C1, C2)	Cutlers' Hall, Church Street, Sheffield, S1 1HG
01/08/2019	HAC Detachment of the City of London Police Special Constabulary Centenary Dinner (LM, LMS)	HAC

DECLARATION OF HOSPITALITY
Sheriffs – Alderman Vincent Keaveny and The Hon Elizabeth Green

28th September 2018 – 31st August 2019

DATE	EVENT	LOCATION
02/10/2018	Horners' Company Banquet (LMLT, SH1, SH2, C1, C2)	Egyptian Hall
03/10/2018	Glovers' Company Banquet (LMLT, SH1, SH2, C1)	Egyptian Hall
04/10/2018	Distillers' Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
05/10/2018	Pikemen and Musketeers Ladies Night Ye Feast (LM, LMS, SH1, SH2, C1, C2)	Armoury House, City Road, London EC1
10/10/2018	ORT UK Dinner (SH1)	Egyptian Hall
11/10/2018	Security Professionals Company Dinner (SH1, SH2, C1, C2)	Egyptian Hall
18/10/2018	Woolmen's Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Ironmongers Hall
19/10/2018	Framework Knitters' Company Banquet (LMLT, SH1, SH2, C1 & C2)	Egyptian Hall
24/10/2018	Upholders' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
26/10/2018	Engineers' Company Dinner (RLM, SH1, SH2, C1, C2)	Egyptian Hall
31/10/2018	Glass Sellers' Company Dinner (RLM, SH1, SH2, C1, C2)	Egyptian Hall
01/11/2018	Reform Club Livery Dinner (SH1, SH2 & C2)	Reform Club, 104 Pall Mall, London SW1
02/11/2018	BRI Event: Networking Reception & Hot Buffet Dinner (SH2 & C2)	Painters' Hall, 9 Little Trinity Lane, EC4V 2AD
06/11/2018	CURRIERS' COURT & LIVERY DINNER (SH1 & SH2)	Cutlers Hall
07/11/2018	City Livery Club Dinner (SH1, SH2, C1, C2)	Ironmongers Hall
08/11/2018	Goldsmiths' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Goldsmiths Hall
13/11/2018	Gresham Dinner of Mercers (LM, SH1, SH2)	Mercers Hall
14/11/2018	Carpenters' Company Dinner (LM, SH1, SH2)	Carpenters' Company Dinner
14/11/2018	Grocers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Grocers Hall
16/11/2018	Coopers' Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
19/11/2018	Coleman Street Ward Club Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
20/11/2018	Joiners and Ceilers Banquet (SH2 & C2)	Innholders 'Hall
21/11/2018	Stationers' and Newspaper Makers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Stationers' Hall
26/11/2018	Bakers' Company Banquet (LM, SH1, SH2)	Egyptian Hall
27/11/2018	Gold and Silver Wyre Drawers' Company Dinner (LM, LMS, SH1, SH2, C1)	Egyptian Hall
28/11/2018	Educators' Company Dinner (LM, LMS, SH2, C2)	Egyptian Hall
29/11/2018	Inspiring Leadership Trust Gala Dinner and Leadership Awards (SH1 & C1)	Goldsmiths Hall

04/12/2018	Her Majesty's Reception for the Diplomatic Corps (LM, LMS, SH1, SH2, C1, C2)	Buckingham Palace
05/12/2018	Cutlers' Company Boar's Head Feast (LM, LMS, SH1, SH2, C1, C2)	Cutlers Hall
06/12/2018	Makers of Playing Cards Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
10/12/2018	Guild of Freeman Banquet (LMLT, SH1, SH2, C1)	Guildhall
13/12/2018	Fan Makers' Company Dinner (LMLT, SH1, SH2, C1, C2)	Egyptian Hall
18/12/2018	Turners' Company Livery Dinner (LM, SH1, SH2, C2)	Saddlers' Hall
19/12/2018	Royal Society of St George Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
20/12/2018	British Red Cross Concert and Dinner (LM, LMS, SH1, SH2, C1, C2)	St Paul's Cathedral
07/01/2019	Feltmakers' Plow Monday Dinner (SH1 & SH2)	Armourers' Hall
09/01/2019	Dyers' Company Dinner (LM, SH1, SH2)	Leathersellers' Hall
15/01/2019	Farmers' Company Banquet (SH1, SH2, C1 & C2)	Goldsmiths' Hall
16/01/2019	Fuellers' Company Dinner (SH2 & C2)	Central Criminal Court
16/01/2019	Woolmen's Company Alms Court Meeting and Dinner	Barber Surgeons' Hall
18/01/2019	Armourers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
21/01/2019	Solicitors' Company Dinner (SH1)	Cutlers' Hall, Warwick Lane, London. EC4M 7BR
24/01/2019	Pattenmakers' Company Dinner (SH1, C1)	Egyptian Hall
29/01/2019	Livery Academy Awards (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
30/01/2019	TheCityUK Annual Dinner (LM, SH1, SH2)	Plaisterers' Hall
31/01/2019	MagnaMasters' Fourth Gala Dinner (SH1 & C1)	Drapers' Hall
01/02/2019	HAC Mess Club Dinner (LM, LMS, SH1, SH2)	Honourable Artillery Company
02/02/2019	London Mayors' Association Annual Dinner (SH2, C2)	Corinthia Hotel, Whitehall Place, London SW1A 2BD
04/02/2019	Needlemakers' Company Dinner (LM, LMS, SH1, SH2, C1 & C2)	Egyptian Hall
06/02/2019	Ironmongers' Company Dinner (LM, SH2)	Ironmongers Hall
07/02/2019	Skinners' Company Dinner (LM, LMS, SH2, C2)	Skinners' Hall
07/02/2019	Co-operation Ireland Dinner (RLM, SH1, C1)	Egyptian Hall
11/02/2019	The Guild Of Nurses House Of Commons Dinner (SH1 & C1)	Terrace Dining Room A, House of Commons, London SW1A 0AA
13/02/2019	Fruiterers' Company Dinner (LMLT, SH1, SH2, C1, C2)	Egyptian Hall
15/02/2019	Gardeners' Company Dinner (LMLT, SH1, SH2, C1, C2)	Egyptian Hall
18/02/2019	City of London Circle Meeting and Dinner (SH1)	Lansdowne Club, 9 Fitzmaurice Place, London W1
19/02/2019	Founders' Civic Dinner (SH1 & C1)	The Founders' Hall
20/02/2019	Khulisa Fundraising Dinner (SH2)	Central Criminal Court

25/02/2019	Mencap Fundraising Dinner (RLM, SH2, C2)	Mansion House
25/02/2019	Fletchers' Ladies Banquet (SH1 & C1)	Trinity House
27/02/2019	International Bankers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
28/02/2019	World Traders' Tacitus Lecture, Reception and Dinner inc travel (RLM, SH2, C2)	Guildhall & Armourers' Hall
05/03/2019	Solicitors' Company Dinner (RLM, SH1, C1)	Egyptian Hall
05/03/2019	Saddlers Company Court & Livery Dinner (SH2)	Saddlers' Hall
06/03/2019	Dinner with HE The Ambassador of Ireland	17 Grosvenor Pl, Belgravia, London SW1X 7HR
06/03/2019	Chartered Accountants' Company Lecture and Dinner (SH2)	Chartered Accountants' Hall
08/03/2019	Cordwainers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Clothworkers' Hall
11/03/2019	Guild of HR Charity Banquet (LM, LMS, SH1, SH2, C1, C2)	Fishmongers' Hall
14/03/2019	Baltic Irish Dinner (SH1)	The Brewery , 52 Chiswell Street EC1Y 4SD
14/03/2019	Phoenix Past Masters Dinner (SH2, C2)	Mercers' Hall
15/03/2019	Masons' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
16/03/2019	St Patrick's Day Ball (SH1 & C1)	InterContinental Hotel, Park Lane, London W1J 7QY
19/03/2019	Worshipful Company of Innholders Dinner (SH1, SH2, C1, C2)	Inholders' Hall
20/03/2019	WC Chartered Secretaries' and Administrators' Tutt Rivers Lecture, Reception and Dinner (SH2 & C2)	Stationers' Hall, Ave Maria Lane, London EC2M 7DD
25/03/2019	City Pickwick Club Dinner (SH1)	George & Vulture, 3 Castle Court, EC3V 9DL
26/03/2019	Chartered Surveyors Company Spring Livery Dinner (SH1, C1)	Goldsmiths Hall
27/03/2019	Drapers' Company Livery Dinner (SH1, SH2, C1, C2)	Bob
01/04/2019	City, University of London Rector's Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
02/04/2019	Leathersellers' Company Dinner (LM, SH1, SH2)	Leathersellers' Hall
03/04/2019	Clothworkers' Company Dinner (LM, LMS, SH1, SH2, C1)	Clothworkers' Hall
04/04/2019	Insurers' Company 40th Anniversary Dinner (LM, LMS, SH2, C2)	Egyptian Hall
05/04/2019	Scriveners International Union of Notaries Dinner (LM, LMS, SH1, C1)	Egyptian Hall
05/04/2019	National Liberal Club's Livery Dinner (SH2, C2)	National Liberal Club
06/04/2019	Fourth annual British Ethnic Diversity Sports Awards (BEDSA's) Charity Dinner (SH2 & C2)	Hilton London Hotel
09/04/2019	Upholders' Installation Dinner (SH1 & C1)	Goldsmiths Hall
09/04/2019	Ashridge Golf Club Reception, Tour & Dinner (SH2, C2)	Central Criminal Court
10/04/2019	Distillers' Court & Livery Dinner (SH1)	Saddlers' Hall
12/04/2019	Environmental Cleaners' Dinner (RLM, SH1, C1)	Egyptian Hall
12/04/2019	Framework Knitters Installation Dinner (SH2, C2)	Clothworkers' Hall

15/04/2019	Pewterers Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
23/04/2019	Spectacle Makers' Livery Dinner (SH1 & C1)	Goldsmiths' Hall
23/04/2019	Royal Society of St George 125 Anniversary Banquet (LM, LMS, SH2, C2)	Guildhall
24/04/2019	Woolmen's Company Dinner (SH1)	Saddlers' Hall
25/04/2019	Chartered Secretaries and Administrators' Company Banquet (RLM, SH1, SH2, C1)	Egyptian Hall
29/04/2019	Builders' Merchants Election Court Supper (SH2 & C2)	HQS Wellington
30/04/2019	Dinner with Major General Ben Bathurst (SH1 & C1)	8 Cadogan Gardens, Chelsea, SW3 2RS
08/05/2019	Cooks' Company Civic Dinner (SH1 & SH2)	Innholders Hall
09/05/2019	Tyler's and Bricklayers Annual Livery Dinner (SH2 & C2)	Clothworkers' Hall
09/05/2019	Weavers' May Dinner (SH1 & C1)	Skinners' Hall
14/05/2019	Furniture Makers' Company Dinner (LM, LMS, SH1, C1)	Egyptian Hall
14/05/2019	Candlewick Ward Club Civic Dinner (SH2, C2)	Bakers' Hall
17/05/2019	Blacksmiths' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
20/05/2019	Arbitrators' Charter Commemoration Banquet (RLM, SH1, SH2, C1, C2)	Egyptian Hall
21/05/2019	Festival of The Sons of The Clergy Dinner (SH2, C2)	Merchant Taylors' Hall
21/05/2019	Plaisterers' Banquet (SH1 & C1)	Plaisterers' Hall
22/05/2019	Wheelwrights' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
23/05/2019	Ironmongers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
24/05/2019	Painter-Stainers' Barnett Dinner (SH1, C1)	Painters' Hall
30/05/2019	Actuaries' Company Banquet (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
31/05/2019	Farriers Company Banquet (LM, LMS, SH2, C2)	Egyptian Hall
05/06/2019	Feltmakers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
06/06/2019	Loriners' Company Banquet (RLM, SH2, C2)	Egyptian Hall
06/06/2019	Constructors' Sir Christopher Wren Banquet (SH1*, C1)	Fishmongers Hall
10/06/2019	Institute of Directors City of London Branch Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
12/06/2019	Glass Sellers' Company Dinner (SH2 & C2)	Apothecaries Hall
17/06/2019	Barbers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Barber Surgeons Hall
21/06/2019	Apothecaries' Society Dinner (SH1*, SH2, C1, C2)	Apothecaries' Hall
24/06/2019	Curriers' Company Dinner (SH1*, SH2, C1 & C2)	Leathersellers Hall
27/06/2019	Glaziers' Company Dinner (LMLT, SH1, SH2, C1, C2)	Egyptian Hall
28/06/2019	Framework Knitters Livery Dinner (SH2, C2, SH1, C1)	Barber Surgeons' Hall

01/07/2019	Bakers Company Court and Livery Dinner (SH2)	Bakers Hall
04/07/2019	Information Technologists' Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
05/07/2019	Girdlers' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Gliders Hall
08/07/2019	City Livery Club Dinner (LMLT, LMS, SH1, SH2, C1, C2)	Egyptian Hall
10/07/2019	Tin Plate Workers' Company Installation Banquet (SH1 representing LM, C1, SH2)	Egyptian Hall
11/07/2019	Carlton Club Freeman's & Liverymen's Dinner (SH1, C1)	Carlton Club
15/07/2019	India Day VIP Dinner (LM, SH1)	Guildhall
17/07/2019	Chartered Accountants' Company Dinner (LM, LMS, SH1, SH2, C1, C2)	Egyptian Hall
19/07/2019	Dr Christopher Moran, Chairman, Co-Operation Ireland	Crosby Hall, Cheyne Walk, Chelsea, London SW3 5BB
23/07/2019	Phoenix Past Masters & Mistresses Dinner (SH2, C2)	Central Criminal Court
24/07/2019	Marketors' Company Banquet (RLM, SH1, SH2, C1, C2)	Egyptian Hall
26/07/2019	Cutlers' in Hallamshire Forfeit Feast (LM, LMS, SH1, SH2, C1, C2)	Cutlers Hall
30/07/2019	Farmers' Company Dinner (SH2)	Central Criminal Court

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10/12/18	Breakfast with HSBC Canada	Vancouver
10/12/18	Fintech Lunch (hosted by British Consul-General)	Vancouver
11/12/18	Fintech Reception (hosted by Blenheim Chalcot)	San Francisco
12/12/18	Breakfast with Fitzgerald Law	San Francisco
12/12/18	Dinner (hosted by HM Ambassador)	Mexico City
13/12/18	Breakfast (hosted by HM Ambassador)	Mexico City
13/12/18	Dinner (hosted by HM Ambassador)	Mexico City
14/12/18	Lunch (hosted by HM Ambassador)	Mexico City

LM's Visit to Colombia and Brazil

6/5/19	Green Finance Breakfast (hosted by HM Ambassador)	Bogota
6/5/19	Lunch with Lloyds of London	Bogota
6/5/19	Reception (hosted by HM Ambassador)	Bogota
7/5/19	Lunch with Central Bank of Colombia	Bogota
8/5/19	Dinner (hosted by HM Ambassador)	Sao Paulo
9/5/19	Dinner (hosted by HM Trade Commissioner)	Sao Paulo
10/5/19	Fintech Breakfast with InovaBra	Sao Paulo

LM's Visit to Canada & USA

25/6/19	Breakfast with KPMG	Toronto
25/6/19	Lunch with HSBC	Toronto
25/6/19	Reception with CAASA	Toronto
26/6/19	Reception (hosted by British Consul General)	Chicago
27/6/19	Lunch with Metro Atlanta Chamber	Atlanta
27/6/19	Reception (hosted by British Consul General)	Atlanta
28/6/19	Lunch with Holland & Knight	Atlanta

LM's Visit to China

8th - 9th September	Overnight Accommodation	Perth
8th September	Dinner	Perth
9th September	Breakfast	Perth
9th September	Buffet Lunch	Melbourne
9th - 11th September	Overnight Accommodation	Melbourne
10th September	Buffet Breakfast	Melbourne
10th September	Buffet Lunch	Melbourne
10th September	Dinner	Melbourne
11th September	Lunch	Melbourne
12th September	Lunch	Canberra
13th September	Breakfast	Canberra
13th September	Lunch	Sydney

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By virtue of paragraph(s) 2, 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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