



## Civic Affairs Sub-Committee

**Date:** TUESDAY, 6 DECEMBER 2022

**Time:** 3.30 pm

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

**Members:**

Deputy Edward Lord (Chair)	Deputy Sir Michael Snyder
Deputy Simon Duckworth (Chief Commoner) (Deputy Chairman)	Alderman Gregory Jones KC
Nicholas Bensted-Smith	Emily Benn
Deputy Keith Bottomley	James Bromiley-Davis
Tijs Broeke	Sophie Anne Fernandes
Mary Durcan	Deputy Dr Giles Shilson
Deputy Christopher Hayward	Alderman Sir William Russell
Deputy Ann Holmes	Wendy Mead
Alderman Ian David Luder	Alderman Professor Michael Mainelli

**Enquiries:** Chris Rumbles  
christopher.rumbles@cityoflondon.gov.uk

### Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:  
< [www.youtube.com/watch?v=ai-lqlo8RbU](https://www.youtube.com/watch?v=ai-lqlo8RbU) >

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**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**

To agree the public minutes of the Civic Affairs Sub-Committee meeting on 7 October 2022.

**For Decision**  
(Pages 7 - 14)

4. **WORK PROGRAMME**

Report of the Town Clerk.

**For Information**  
(Pages 15 - 16)

### **Members Facilities and Support**

5. **PARENTAL ARRANGEMENTS FOR MEMBERS**

Report of the Town Clerk.

**For Information**  
(Pages 17 - 18)

### **Ethical Standards**

6. **MEMBERS' CODE OF CONDUCT**

Joint report of the Comptroller and City Solicitor and Town Clerk and Chief Executive.

**For Decision**  
(Pages 19 - 80)

### **General Business**

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

8. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

9. **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**

10. **BUSINESS TRAVEL SERVICES - OPTIONS (STAGE 1) AND AWARD (STAGE 2) REPORT**

Report of the Chief Operating Officer.

**For Information**  
(Pages 81 - 90)

**Part 3 - Private Agenda**

The following matters relate to functions of the Court of Common Council which are not subject to the provisions of Part VA and Schedule 12a of the Local Government Act 1972, relating to public access to meetings. The matters will, therefore, be considered in non-public session unless the committee determines to the contrary.

11. **MINUTES**

To agree the non-public minutes of the Civic Affairs Sub-Committee meeting on 7 October 2022.

**For Decision**  
(Pages 91 - 98)

**Benefices**

12. **CHAIR TO BE HEARD**

**For Information**

**Hospitality**

13. **GUILDHALL CHARGING REVIEW**

Report of the Remembrancer.

**For Decision**  
(Pages 99 - 114)

14. **CART MARKING CEREMONY - 2023**

Report of the Remembrancer.

**For Decision**  
(Pages 115 - 120)

15. **APPLICATIONS FOR THE USE OF THE GREAT HALL**

Report of the Remembrancer.

**For Decision**  
(Pages 121 - 124)

16. **FORTHCOMING CORPORATE AND STAKEHOLDER HOSPITALITY**

Report of the Executive Director of Innovation and Growth.

**For Information**  
(Pages 125 - 126)

17. **DELEGATED AUTHORITY REPORT**

Report of the Remembrancer.

**For Information**  
(Pages 127 - 128)

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

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

**Applications for Hospitality / Forthcoming Commitments / Funding Reports**

a) Application A (Pages 129 - 132)

Report of the Remembrancer.

b) Application B (Pages 133 - 136)

Report of the Remembrancer.

c) Application C (Pages 137 - 140)

Report of the Remembrancer.

d) Application D (Pages 141 - 144)

Report of the Remembrancer.

- e) Application E (Pages 145 - 148)

Report of the Remembrancer.

- f) Application F (Pages 149 - 152)

Report of the Remembrancer.

- g) Evaluation of City Hosted Events (Pages 153 - 156)

Report of the Remembrancer.

- h) Forthcoming Committee or Court Events Involving Hospitality (Pages 157 - 158)

Report of the Remembrancer.

- i) Summary of Committed Hospitality Funding (Pages 159 - 172)

Joint report of the Chamberlain and Remembrancer.

- j) Various Receptions - Final Accounts (Pages 173 - 184)

Joint report of the Chamberlain and Remembrancer.

#### **Part 4 - Confidential Agenda**

#### **20. MINUTES**

To agree the confidential minutes of the Civic Affairs Sub-Committee meeting on 7 October 2022.

**For Decision**

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## CIVIC AFFAIRS SUB-COMMITTEE

Friday, 7 October 2022

Minutes of the meeting of the Civic Affairs Sub-Committee held at Committee Room, West Wing 2nd Floor, Guildhall on Friday, 7 October 2022 at 10.00 am and available to view at [www.youtube.com/watch?v=6mPbcuJJ0m8&t=338s](http://www.youtube.com/watch?v=6mPbcuJJ0m8&t=338s)

### Present

#### Members:

Deputy Edward Lord (Chair)  
Deputy Simon Duckworth (Chief Commoner) (Deputy Chairman)  
Mary Durcan  
Emily Benn  
James Bromiley-Davis  
Alderman Sir William Russell  
Wendy Mead

#### In Attendance (Observing Online)

Tijs Broeke  
Alderman Gregory Jones KC

#### Officers:

Jenna Brassett	- Chamberlain's Department
Rachel Cartwright	- Remembrancer's Office
Michael Cogher	- Comptroller and City Solicitor
Mathew Cooper	- Town Clerk's Department
Leann Corachea	- Remembrancer's Office
Polly Dunn	- Town Clerk's Department
Paul Double	- City Remembrancer
William Elliott	- Innovation and Growth
June Haynes	- Town Clerk's Department
Claire Holdgate	- Innovation and Growth
Fiona Hoban	- Remembrancer's Office
Caroline Jack	- Executive Director and Private Secretary to Lord Mayor
Nigel Lefton	- Remembrancer's Office
Greg Moore	- Assistant Town Clerk
Peter Ochser	- City Surveyor's Department
Dorian Price	- City Surveyor's Department
Chris Rumbles	- Town Clerk's Department
Bob Roberts	- Deputy Town Clerk
Gemma Stokley	- Town Clerk's Department
Paul Wright	- Deputy Remembrancer

The Chair confirmed their intention to change the running order of the agenda to take non-public items during the first part of the meeting. The Remembrancer would

need to be away from the meeting early to attend a freedom ceremony and, given the substantive items in the non-public part of the agenda were reports in his name, it was considered appropriate to deal with these items first. Members were in agreement with the re-ordering of the agenda as proposed.

**10. EXCLUSION OF THE PUBLIC**

RESOLVED: That Members agreed to exclude the public for the following matters relating to functions of the Court of Common Council which were not subject to the provisions of Part VA and Schedule 12a of the Local Government Act 1972, relating to public access to meetings.

**Part 2 - Non-Public Agenda**

**11. MINUTES**

RESOLVED: That the non-public minutes of the Civic Affairs Sub-Committee meeting on 18 July 2022 be approved as an accurate record.

**12. DELEGATED AUTHORITY REPORT**

The Sub-Committee received a report of the Remembrancer detailing delegated action taken between meetings.

**Benefices**

**13. CHAIR TO BE HEARD**

The Chair provided the Sub-Committee with an oral update relating to Benefices.

**Hospitality**

**14. APPLICATIONS FOR HOSPITALITY**

The Sub-Committee considered several applications for hospitality.

**a) Application A**

**b) Application B**

**c) Application C**

**15. APPLICATIONS FOR THE USE OF GREAT HALL**

The Sub-Committee considered a report detailing applications for the use of Guildhall.

**16. FORTHCOMING COMMITTEE OR COURT EVENTS INVOLVING HOSPITALITY**

The Sub-Committee received a report of the Remembrancer detailing forthcoming Committee or Court events involving hospitality.

**17. FORTHCOMING CORPORATE AND STAKEHOLDER ENGAGEMENT EVENTS**



The Sub-Committee received a report of the Director of Innovation and Growth detailing corporate and stakeholder engagement events.

18. **SUMMARY OF COMMITTED HOSPITALITY FUNDING FOR 2021-22, 2022-23 AND 2023-24**

The Sub-Committee received a joint report of the Chamberlain and Remembrancer detailing committed hospitality funding.

19. **VARIOUS RECEPTIONS - FINAL ACCOUNTS**

The Sub-Committee received a joint report of the Chamberlain and Remembrancer detailing various receptions – final accounts.

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

**City Corporation Logo** - A Member raised a question relating to use of the City Corporation's crest and logo.

21. **ANY OTHER BUSINESS THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no additional items of business.

**Part 3 – Confidential Agenda**

22. **MINUTES**

RESOLVED: That the confidential minutes of the Civic Affairs Sub-Committee meeting on 18 July 2022 be approved as an accurate record.

23. **STATE OCCASIONS**

The Remembrancer was heard relating to state occasions.

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At the conclusion of non-public and confidential items of business, the Town Clerk confirmed the intention to move to consideration of the public part of the agenda at this point in the meeting.

1. **APOLOGIES**

Apologies were received from Sophie Fernandes, Nick Bensted-Smith, Brian Mooney, Keith Bottomley and Ian Luder.

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

Edward Lord and Mary Durcan confirmed they were guests at a recent City Property Association leadership dinner.

3. **MINUTES**

RESOLVED: That the public minutes of the Civic Affairs Sub-Committee meeting held on 18 July 2022 be approved as an accurate record.

4. **WORK PROGRAMME**

The Sub-Committee received a report of the Town Clerk providing Members with a work programme of relevant items relating to the work of the Sub-Committee. Updates were noted as follows:

**Parental Arrangements for Members** – Information was currently being collated into one document for Members' ease of reference detailing the parental provision already available through existing provision. The Chair proposed a deadline of 31<sup>st</sup> October for completion of the document.

A Member questioned whether the booklet would assist Members of the public and it was clarified that it would be exclusive to Members due to access requirements and certain locations not being open to the public.

**Members Workspace Requirements** – Three rooms were now available on the mezzanine level for the Chairman of Finance, Chairman of Planning and Transportation Committee and Deputy Chairman of Policy and Resources Committee. Work continued through assessing options for full dial in capability for virtual meetings being built into each room, but with cabling for this proving expensive and with alternative options being explored e.g., one room with shared use for virtual meetings. Additional funding options would otherwise need to be explored.

The Chair proposed a deadline be set of week beginning 10<sup>th</sup> October for the Deputy Chairman of Policy and Resources Committee's move from his temporary to permanent office on the mezzanine level.

The Chair requested an update relating to space being identified for Innovation and Growth and their move to an alternative location. Members noted this continued to be worked through with the space identified meaning a potential income loss for IG and the department needing to come back with a firm proposal in this regard.

The City Surveyor confirmed a report was due to be presented and considered by Operational Property and Projects Sub-Committee later in the month when alternative options were being considered, following which a clearer picture would emerge.

The Chair requested that they and the Deputy Chairman be kept up to date on progress in identifying an alternative location for Innovation and Growth, with the current agreement being that the Members' room on the 2<sup>nd</sup> floor West Wing being used by Chairs and Deputy Chairs would be handed over to Members for general use as soon as the Members currently using this space could move elsewhere.

**Review of the Members' Financial Assistance Scheme** - A Meeting has taken place with the Chair of London Councils Independent Remuneration

Panel. An extensive list of information the Panel require to assist them in their consideration of the Scheme has been provided, which once received by the Panel would allow them an opportunity to assess the level of work required and present a cost for this.

The Chair reminded Members that delegated authority had previously been granted to approve final instructions and a fee for an Independent Panel review of the City Corporation's Financial Assistance Scheme and that that this could be progressed, and the necessary approval sought at an appropriate point.

The Assistant Town Clerk referred to an additional consideration relating to payments to Members. Payments were currently on a quarterly basis but with this frequency of payment presenting an unintended consequence for individual in receipt of benefits. An opt in scheme was an option being explored with payments moving to a monthly frequency. The Chair remarked on the whole point of the Members' Financial Assistance Scheme being to support Members and if it proved easier for Members to opt in on a monthly basis then this option should be supported.

The Town Clerk added how there was a need to explore with the external provider if there would be any additional cost involved for administering a monthly payment, but that he would take this away and review options.

RESOLVED: That Members receive the report and note its content.

5. **DECISIONS TAKEN UNDER DELEGATED AUTHORITY OR URGENCY POWERS IN ACCORDANCE WITH STANDING ORDER NOS. 41(A) AND 41(B)**

The Sub-Committee received a report of the Town Clerk advising Members of action taken by the Town Clerk, in consultation with the Chairman and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and 41(b).

The Deputy Chairman referred to usage of the Members' bedrooms and his concern that these were being block booked and used on occasions other than official use, with the bookings benefiting from a significant subsidy. The Chair added how any booking outside of official use would incur a cost; if a Member was block booking and claiming official use then this would be of concern, but otherwise where a Member was paying for their overnight stay then they did not consider it a significant issue.

The Chair further commented on provision already in place to refer any issues of concern to them and the Deputy Chairman. A Member questioned the existing demand on rooms and whether there was any issue in meeting this, with it generally being accepted that there would be pressure on rooms around major events.

A Member suggested it would be helpful to understand current usage levels, at which point the Assistant Town Clerk confirmed current monthly usage statistics for the Members' Bedrooms showing an average level of occupancy of 65-80%, which Members noted.

RESOLVED: That the report be received, and its content noted.

**6. MEMBERS LEARNING AND DEVELOPMENT**

The Sub-Committee considered a report of the Town Clerk providing Members with an update in respect of Members' learning, development and training issues and seeking authority to establish a refreshed Member Learning and Development Steering Group in order to take this work forward.

The Town Clerk updated Members on work that had taken place to date through a comparison exercise with Local Authorities to understand learning and development provided elsewhere, in consulting Chief Officers to consider the learning and development Members would benefit from to fulfil their role and through looking at the potential of introducing a discreet digital area for Members related specifically to their learning and development.

Members noted the current learning and development strategy had been tested against current best practice to understand where there were any gaps, all of which would go through the Members Development Steering Group before coming back to Civic Affairs Sub-Committee.

The Chair welcomed what they considered to be a very helpful and informative report and thanked the officers for all their work in preparing it. The Chair proposed that the Town Clerk write to all Members of Civic Affairs Sub-Committee seeking expressions of interest in filing the two available places on the Member Development Steering Group.

RESOLVED: That Members: -

- Note the information in the report and the progress made;
- Approve the refresh and proposed membership of the Member Learning and Development Steering Group and revised Terms of Reference and to;
- Approve option 2.

**7. MEMBER'S CODE OF CONDUCT**

The Sub-Committee received a report of the Comptroller and City Solicitor and Monitoring Officer presenting the City Corporation's current Code of Conduct for Members to review against the Model Code of Conduct produced by the Local Government Association (LGA).

The Chairman remarked on their instinct being a need to move closer to the LGA model through introduction of a hybrid version of the Code of Conduct, using the best parts of the City Corporation's Code of Conduct and add these to the LGA's Code Model Code of Conduct.

The Chair proposed an amalgamated version of the Code of Conduct be produced for the next meeting of Civic Affairs Sub-Committee to allow Members an opportunity to consider this further, following which consultation could take place with the wider Members of the Court before taking a final

version forward to Policy and Resources Committee and Court of Common Council seeking approval.

The Comptroller referred to some of the language used in the LGA's Code being more modern and legalistic and so it may be worth including this wording in the City Corporation's version.

A Member offered their endorsement of a hybrid version, whilst adding the importance of bearing in mind that many Members would be regulated in their own right in their professional life, with enhanced conduct rules that they already need to adhere to. It was suggested that the Members' Code of Conduct would need to tie in with Members in their professional capacity.

The Chair responded to this point and remarked on how previous consideration of the Members Code of Conduct had a number of previous incumbents not wanting a link between their professional code and the Members' Code of Conduct.

The Chair proposed that no decision be taken today, and that the Comptroller be asked to take time to amalgamate the two codes and come back in December with an updated version for Members to consider, following which consultation could take place with the wider Members of the Court before taking a final version to Court of Common Council in March 2023.

The Comptroller added how there was no immediate rush to produce an updated Members' Code of Conduct with there being nothing wrong with the City Corporation's existing version.

RESOLVED: That Members:

- Agreed that the Comptroller and City Solicitor produce an amalgamated version of the LGA Model Code of Conduct and City Corporation's Code of Conduct for Members for further consideration and review.

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

A Member questioned if there was any update on the Civic Affairs Sub-Committee Strategy Session and the Chair confirmed 9<sup>th</sup> December was currently being considered as an option, but with the final date still to be determined and confirmed with Members in due course.

## **9. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

**Budget** - The Chair referred to a need for a financial report from the Chamberlain drawing together budgets over which Civic Affairs Sub-Committee has oversight, with the Chamberlain tying together the different budgetary strands so they can all be presented to this Sub-Committee.

**The meeting ended at 11.56am**

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Chairman

**Contact Officer: Chris Rumbles**  
**christopher.rumbles@cityofllondon.gov.uk**

Civic Affairs Sub : Work Programme 2022

Work Area	Agreed position	Update
Parental Arrangements for Members (17.05.22)	<ul style="list-style-type: none"><li>Town Clerk to consider further and report back at an appropriate point on what additional parental provision can be provided to Members.</li></ul>	<p><b>ONGOING</b></p> <p>Work has taken place looking at what parental provision is already in place and what additional support can potentially be provided through existing schemes. Contact has been made with Local Authorities and the Local Government Association looking at parental provision provided across local government and considering best practice in this regard.</p> <p>Work is ongoing pulling together information on all the parental provision currently available at the City Corporation into one document so this can then be provided to Members for their ease of reference.</p> <p>One page document on Civic Affairs Sub-Committee agenda on 06.12.22'</p>
Members' Workspace Requirements (17.05.22)	<ul style="list-style-type: none"><li>Town Clerk and City Surveyor to proceed with developing the option of providing additional facilities on the mezzanine level of the West Wing.</li></ul>	<p><b>ONGOING</b></p> <p>Work has been completed (15/09/22) to deliver an initial three offices (west side – P&amp;T Chairman, Finance Chairman and Deputy CPR) on the Mezzanine for allocation to Senior Members at de minimis cost, as plan attached.</p> <p>The remaining space to the eastern side, including the two offices (Corporate Services Chairman and CoL Police Authority Chairman) require the current IG teams to move once alternative space is available.</p> <p>Proposals relating the eastern part of the Mezzanine and two remaining required offices, will be subject to future reporting.</p> <p>Report presented to Operational Property and Projects Sub-Committee on 23/11/22 referencing IG move from West Wing Mezzanine. Oral update to be given at Civic Affairs Sub-Committee on 6.12.22.</p>
Members' Administrative Support (17.05.22)	<ul style="list-style-type: none"><li>Town Clerk to report back with recommendations and proposals for consideration relating to administrative support for Members.</li></ul>	<p><b>ONGOING</b></p> <p>Resources for an additional 0.5 FTE post have now been secured; however, given general funding pressures and restrictions on growth bids, work remains ongoing to identify whether budgetary provision can be identified in respect of the remaining 0.5 FTE required. If and when additional funding is identified, the Sub-Committee will be asked to consider whether the post should be used to enhance support and resilience for the existing individuals in receipt of support, or whether to extend the pool of supported individuals.</p>

		Oral update to be given at Civic Affairs Sub-Committee on 6.12.22.
Members' Transportation Arrangements (17.05.22)	<ul style="list-style-type: none"><li>Town Clerk to arrange a review of the Members' Transportation Policy and Member aspects of the Business Travel Scheme looking at appropriate linkages across the organisation and reporting back.</li></ul>	<p><b><u>ONGOING</u></b></p> <p>The Town Clerk agreed to review Member's Business Travel Scheme and Transportation Policies. This work has commenced and a report was presented at Civic Affairs Sub-Committee agenda in July setting out the latest position.</p> <p>Oral update to be given at Civic Affairs Sub-Committee on 6.12.22.</p>
Review of the Members' Financial Assistance Scheme and Options for Phase 2 (17.05.22)	<ul style="list-style-type: none"><li>London Councils Independent Remuneration Panel to be invited to review options for introducing Special Responsibility Allowances at the City Corporation.</li></ul>	<p><b><u>ONGOING</u></b></p> <p>Contact has with made London Councils Independent Remuneration Panel, but they were not able to take on additional work at this time owing to the Chair's commitments. Two of the three panel Members confirmed their willingness to under the work together.</p> <p>Feedback is awaited from the panel Members on the level of work involved and a proposed fee for undertaking this work.</p> <p>Oral update to be given at Civic Affairs Sub-Committee on 6.12.22</p>
Court of Common Council – Arrangements for Members (17.05.22)	<ul style="list-style-type: none"><li>Town Clerk and City Surveyor to review options for additional space requirements in Court of Common Council meetings.</li></ul>	<p><b><u>ONGOING</u></b></p> <p>Options were to be explored over the summer recess period and reported back. Options are still to be explored owing to more pressing considerations in other areas work taking priority over the summer recess period.</p>
New Member Induction Feedback	<ul style="list-style-type: none"><li>Formal report to follow conclusion of the New Member Induction Programme providing feedback.</li></ul>	<p><b><u>ONGOING</u></b></p> <p>Detailed update to follow at the conclusion of the induction period. Date to be confirmed.</p>
Benefices	<ul style="list-style-type: none"><li>Contact to be made with Members seeking nominations to act as City Corporation link with benefices.</li></ul>	<p><b><u>ONGOING</u></b></p> <p>Chair has reached out to Members seeking nominations. Oral update to be given at Civic Affairs Sub-Committee on 6.12.22.</p>



## **Provision of baby changing facilities around Guildhall**

Guildhall now has **six** baby changing facilities across the complex that are open to the public/users of events and elected Members, and are located as follows;

- Art Gallery Cloakroom Area Toilet
- First Aid Room – Art Gallery
- West Wing Events Area Toilet
- Crypts Area Toilet
- West Wing 2<sup>nd</sup> floor accessible wc
- West Wing 3<sup>rd</sup> floor accessible wc

There is no specific legal requirement for the provision of changing facilities in both male and female toilets; the British Toilet Association advises that for every 10,000 people using an area, there should be at least one unisex baby-changing facility; so, Guildhall complex meets and exceeds this advice.

## **Childcare/dependents payments (i.e., paying for childcare costs incurred while undertaking duties)**

Per paragraph 2(1b) of the Members' Financial Support Policy: "Members are entitled to claim expenses associated with the care of children and dependent adults whilst undertaking City Corporation business, for example, for the period of time required to enable attendance at committee meetings, conferences, training, visits and awaydays."

<https://www.cityoflondon.gov.uk/assets/About-us/members-financial-support-policy-november-2021.pdf>

## **Parental/Guardian Room**

The Lady Members' Room is currently provided, and work is underway to identify a more fit-for-purpose quiet space for feeding and changing.

## **Children attending Committee meetings, Court etc.**

Members are welcome to bring babies to Committee meetings and Court; whilst we would try to accommodate access at other types of Corporation events, this is on-case-by-case basis and subject to requirements including, for instance, venue licensing restrictions for under-18s.

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<b>Committee(s)</b> Civic Affairs Sub-Committee	<b>Date:</b> 6 December 2022
<b>Subject:</b> Members' Code of Conduct	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	<b>6</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>Report of:</b> Comptroller and City Solicitor and Town Clerk and Chief Executive	<b>For Decision</b>
<b>Report author:</b> Edward Wood, Chief Solicitor	

## Summary

Your Sub-Committee reviewed the Corporation's current Members' Code of Conduct and the Local Government Association ("LGA") Model Councillor Code of Conduct in October 2022. Members expressed a preference to adopt a new hybrid Code combining the more modern drafting of the LGA Code with some of the City specific elements from the Corporation's current Code. A first draft of a potential Code is attached for comment and some particular areas for discussion are highlighted in this report. Any proposed new Code will need to be the subject of a wider consultation process before going on to the Policy and Resources Committee and the Court of Common Council for adoption.

## Recommendation(s)

Members are asked to provide comments on the draft Code and in particular:

- To confirm that the Code should continue to apply to all of the Corporation's functions and to all of its Members and external Members;
- To consider the new provision in relation to charities;
- To consider whether there should be mandatory Code of Conduct training;
- To confirm whether the minimum value for gifts and hospitality that must be registered should remain at £100, or be reduced to £50;
- To consider whether the existing provisions about cumulative gifts or hospitality worth £200 or more should be retained or not;

- To confirm that the special arrangements for the Lord Mayor and Sheriffs in relation to gifts and hospitality should be retained;
- To consider the registration of ‘other’ interests in Table 2 and otherwise;
- To consider appropriate arrangements for declarations and participation in meetings where interests are engaged;
- To confirm that the IHRA definition of Antisemitism should be retained;
- To confirm the arrangements for further consultation.

## **Main Report**

### **Background and general comments**

1. Your Sub-Committee reviewed the Corporation’s current Members’ Code of Conduct (Appendix 3) and the LGA Model Councillor Code of Conduct (Appendix 4) in October 2022. Members expressed a preference to adopt a new hybrid Code combining the more modern and illustrative drafting of the LGA Code with some of the City specific elements from the Corporation’s current Code. A first draft of a potential Code is attached for comment (Appendix 1) and a separate document highlighting all of the modifications made to the LGA Code as tracked changes is also included for information (Appendix 2).
2. A lot of the amendments are simply to do with terminology e.g substituting “Member” for “councillor” and “Corporation” for “local authority”. Changes have also been made at various points to reflect the fact that the Town Clerk has traditionally given advice on Code of Conduct matters and played a major role in the registration of interests at the Corporation, supplementing the role of the Monitoring Officer.
3. As requested, paragraph numbers have also been inserted throughout. For ease of cross-referencing, the existing LGA numbering for the main Code provisions has been retained, differentiated with a ‘C’ prefix. However, it has not been a straightforward conversion in all cases, and some more significant changes and areas for discussion are highlighted below.

### **Main modifications to the LGA Code and additional options**

#### **Introduction**

4. The LGA Joint Statement has been omitted and elements of the LGA Introduction and Definitions incorporated into a shorter Corporation specific Introduction (paragraphs 1-4). It has been assumed that the Corporation wishes to continue to apply the Code to all of its functions and to all of its external Members, whether voting or not.

## Charities

5. Given the number of charities that the Corporation is connected with – many more than a typical local authority – it is proposed to add a specific provision in relation to this. An additional reference to Members acting in the best interests of those charities and managing any conflicts of interest or loyalty has therefore been included (C6.2) as well as some explanatory text highlighting the need to comply with any conflicts of interest policy (paragraph 29).
6. With the grant of the Supplemental Charter for Bridge House Estates there will be a requirement to have a conflicts of interest policy and to comply with it. This was something that was of particular interest to the Privy Council Office's advisors in consultation on the draft Charter. It is also envisaged that there will in time be a separate conflicts of interest policy for the open spaces, etc. There was felt to be some synergy between these matters and C6.1, and therefore the charities text has been included at that point, but equally it could be included in a separate section.

## Training

7. It was referenced at your Sub-Committee's previous meeting that the Corporation has previously resisted mandatory Code of Conduct training, as suggested by the LGA. Alternative options have therefore been provided at C8.1, with the second option simply being that Members should familiarise themselves with the Code, and Member views on this are sought.

## Gifts and hospitality

8. The Standards Committee previously considered the issue of gifts and hospitality several times and had settled upon £100 as a reasonable minimum value for registration, notwithstanding the Committee on Standards in Public Life ("CSPL") previously recommending the lower figure of £50. However, as the LGA are again proposing that gifts worth £50 or more should be registered, alternative options have been provided at C10.2, and Members are asked to confirm their views on this.
9. The Corporation's current Code also includes a requirement to register gifts and hospitality with a cumulative value of £200 or more. This was another recommendation of the CSPL (based on the lower figure of £100). However, this requirement does not feature in the LGA Code, and it might be an opportunity to simplify the Corporation's arrangements, particularly if the minimum values were to be reduced. A provision in relation to cumulative values has not been included in the current draft, but again, Members are asked to confirm their views on this.
10. The Corporation's current Code also states that special provision shall be made for the Lord Mayor and other holders of special offices in Guidance to be issued by the Standards Committee. Guidance has previously been published in relation to the Lord Mayor and Sheriffs and it is assumed that Members will want to retain this, under the jurisdiction of your Sub-Committee (paragraph 37), but confirmation is requested.

## Registering 'other' interests – Appendix B

11. The LGA Table 2 has been amalgamated with the list of 'other interests' from the Corporation's current Code. It is proposed to exclude those charities, etc. that the Corporation manages through its Committee structure (because this is not felt to add anything to the information that is already publicly available) but include any appointments to outside bodies. Paragraph 7(j) from the Corporation's current Code (management of any organisation not falling within any other category) has been omitted as potentially being unnecessarily wide, but Member views on this are invited.
12. However, it is proposed to keep the 'catch-all' provision from the Corporation's current Code about registering any other pecuniary or non-pecuniary interest as necessary in order to conform with the Seven Principles of Public Life (Appendix B, paragraph 1) because this avoids the need to try to specify a number of additional scenarios, as in the LGA Code (see below).

## Declaring interests and participation – Appendix B

13. It is proposed to largely retain the provisions from the Corporation's current Code in relation to declarations and participation (Appendix B, paragraphs 5-6). This is because there are some issues with the LGA Code, which goes beyond the legal requirements in several respects:
  - (i) It requires a Member with a disclosable pecuniary interest ("DPI") or any other relevant interest to leave the room, unless they have a dispensation. The Corporation's existing arrangements only requires a Member to leave the room if their continued presence is incompatible with the Code or the Seven Principles of Public Life.
  - (ii) The LGA Code prohibits almost all participation, even in relation to non-statutory/non-pecuniary interests, whereas the Corporation's current Code requires a case by case assessment based on the danger of bias. The LGA approach is not thought to be workable for the Corporation when combined with their definition of 'other interests'.
  - (iii) The LGA Code requires a declaration in every case, even where an interest is already registered. Whilst the Corporation's Guidance currently states that this is good practice, it may not be desirable for a lapse to amount to a breach of the Code when this is not a statutory requirement.
  - (iv) The LGA Code reintroduces the interests of a friend, relative or close associate, which were included in the previous statutory regime under the Local Government Act 2000, but omitted from the Localism Act 2011. This is arguably needlessly complicated, citing various tests that are not actually included in the legislation, which solely concerns a Member or their partner having a DPI in any matter considered. It is felt that the 'catch-all' provision at Appendix B, paragraph 1 is capable of picking up any other interests of concern, in conjunction with C6.

(v) The LGA Code also makes reference to Members' financial interests that are not DPIs, but the list of DPIs is actually felt to be pretty comprehensive, so it is not easy to envisage such a scenario. Again, if there was such an interest, it would be caught by the 'catch-all' provision at Appendix B, paragraph 1, in conjunction with C6.

(vi) The LGA Code doesn't include any explicit implications where gifts and hospitality have been received.

14. However, the Sub-Committee's views on the above matters are sought, and if Members prefer the LGA treatment of any of the above matters then the relevant text can be incorporated into a later iteration of the draft Code.

#### IHRA Definition of Antisemitism – Appendix C

15. It is assumed that Members will want to retain the IHRA definition of Antisemitism, which was previously inserted into the Corporation's Code. It is proposed to leave out Appendix C to the LGA Code, relating to the CSPL. This is because the CSPL recommendations do not reflect the current legal position and the Government has shown no signs of adopting them. The CSPL best practice recommendations have largely already been incorporated, either in the Code or the Corporation's other standards arrangements, and others are not applicable to the Corporation.

#### **Consultation and next steps**

16. Once your Sub-Committee is happy with the draft Code, it will be necessary to consult more widely on the proposals, to include as a minimum all Members and Co-opted Members to whom the Code applies and the Panel of Independent Persons. Once the consultation is complete the proposals can be reported to the Policy and Resources Committee and the Court of Common Council for formal adoption.

#### **Conclusion**

17. Members previously expressed a preference to adopt a new Code of Conduct, combining the LGA Code with some elements of the Corporation's current Code. A first draft of a potential Code is attached for consideration and comment. Once your Sub-Committee is content with the text it will need to be the subject of a wider consultation process before going on to the Policy and Resources Committee and the Court of Common Council for adoption.

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## **Appendices**

**Appendix 1 – Draft Code of Conduct**

**Appendix 2 – Draft Code of Conduct showing tracked changes from LGA Code  
(TO FOLLOW)**

**Appendix 3 – Current Corporation Code of Conduct**

**Appendix 4 – LGA Code**

## **Background papers**

Report to the Civic Affairs Sub-Committee dated 11 October 2022





## **CODE OF CONDUCT FOR MEMBERS**

### **Introduction**

1. The Localism Act 2011 requires a relevant authority to promote and maintain high standards of conduct by its members and co-opted members and to adopt a Code dealing with the conduct that is expected of them when they are acting in that capacity.
2. The legislation only applies to the City of London Corporation ("the Corporation") in its capacity as a local authority or police authority. The Corporation has, however, chosen to apply this Code to all of its functions.
3. The statutory provisions only apply to elected members and co-opted members with voting rights. However, this Code is applied to any member of the Corporation and any member of a committee or sub-committee of the Corporation (collectively referred to as a "Member").
4. This Code is largely based on the Model Councillor Code of Conduct developed by the Local Government Association, with some local differences.

### **Purpose of the Code of Conduct**

5. The purpose of this Code of Conduct is to assist you, as a Member, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow Members, officers and the reputation of the Corporation. It sets out general principles of conduct expected of all Members and your specific obligations in relation to standards of conduct. The Corporation encourages the use of support, training and mediation prior to action being taken using the Code. The fundamental aim of the Code is to create and maintain public confidence in the role of Member and the Corporation.

### **General principles of Member conduct**

6. Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, councillors and local authority officers; should uphold the Seven Principles of Public Life, also known as the Nolan Principles.
7. Building on these principles, the following general principles have been developed specifically for the role of Member.
8. In accordance with the public trust placed in me, on all occasions:

- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect; and
- I lead by example and act in a way that secures public confidence in the role of Member.

9. In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community
- I do not improperly seek to confer an advantage, or disadvantage, on any person
- I avoid conflicts of interest
- I exercise reasonable care and diligence; and
- I ensure that public resources are used prudently in accordance with the Corporation's requirements and in the public interest.

### **Application of the Code of Conduct**

10. This Code of Conduct applies to you as soon as you make your declaration of office or attend your first meeting (as a co-opted member) and continues to apply to you until you cease to be a Member.

11. This Code of Conduct applies to you when:

- you are acting in your capacity as a Member and/or as a representative of the Corporation
- you are claiming to act as a Member and/or as a representative of the Corporation
- you are giving the impression that you are acting as a Member and/or as a representative of the Corporation
- you refer publicly to your role as a Member or use knowledge you could only obtain in your role as a Member.

12. The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

13. You are also expected to uphold high standards of conduct and show leadership at all times.

14. You are encouraged to seek advice from the Monitoring Officer or the Town Clerk on any matters that may relate to the Code of Conduct.

### **Standards of Member conduct**

15. This section sets out your obligations, which are the minimum standards of conduct required of you as a Member. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

16. Guidance is included to help explain the reasons for the obligations and how they should be followed.

## **General Conduct**

### ***C1. Respect***

#### **As a Member:**

**C1.1 I treat other Members and members of the public with respect.**

**C1.2 I treat Corporation employees, employees and representatives of partner organisations and those volunteering for the Corporation with respect and respect the role they play.**

17. Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a Member, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.
18. In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in Members.
19. In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the Corporation, the relevant social media provider or the police. This also applies to fellow Members, where action could then be taken under the Member Code of Conduct, and Corporation employees, where concerns should be raised in line with the Corporation's Member / Officer Charter.

### ***C2. Bullying, harassment and discrimination***

#### **As a Member:**

**C2.1 I do not bully any person.**

**C2.2 I do not harass any person.**

**C2.3 I promote equalities and do not discriminate unlawfully against any person.**

20. The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

21. The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.
22. Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
23. The Equality Act 2010 places specific duties on the Corporation. Members have a central role to play in ensuring that equality issues are integral to the Corporation's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services. The Corporation has adopted the International Holocaust Remembrance Alliance definition of antisemitism (see Appendix C).

### ***C3. Impartiality of officers of the Corporation***

#### **As a Member:**

**C3.1 I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the Corporation.**

24. Officers work for the Corporation as a whole and must be politically neutral. They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

### ***C4. Confidentiality and access to information***

#### **As a Member:**

**C4.1 I do not disclose information:**

- a. given to me in confidence by anyone
- b. acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless
  - i. I have received the consent of a person authorised to give it;
  - ii. I am required by law to do so;
  - iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
  - iv. the disclosure is:
    1. reasonable and in the public interest; and
    2. made in good faith and in compliance with the reasonable requirements of the local authority; and
    3. I have consulted the Monitoring Officer prior to its release.

**C4.2 I do not improperly use knowledge gained solely as a result of my role as a Member for the advancement of myself, my friends, my family members, my employer or my business interests.**

**C4.3 I do not prevent anyone from getting information that they are entitled to by law.**

25. Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the Corporation must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

### ***C5. Disrepute***

**As a Member:**

**C5.1 I do not bring my role or the Corporation into disrepute.**

26. As a Member, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other Members and/or the Corporation and may lower the public's confidence in your or the Corporation's ability to discharge your/its functions. For example, behaviour that is considered dishonest and/or deceitful can bring the Corporation into disrepute.

27. You are able to hold the Corporation and fellow Members to account and are able to constructively challenge and express concern about decisions and processes undertaken by the Corporation whilst continuing to adhere to other aspects of this Code of Conduct.

### ***C6. Use of position***

**As a Member:**

**C6.1 I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.**

**C6.2 Where taking decisions on behalf of a charity I act in the best interests of that charity and manage any conflicts of interest or loyalty.**

28. Your position as a Member of the Corporation provides you with certain opportunities, responsibilities and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

29. When acting on behalf of a charity for which the Corporation is the corporate trustee you are also required to comply with any conflicts of interest policy that has been adopted.

## ***C7. Use of Corporation resources and facilities***

**As a Member:**

**C7.1 I do not misuse Corporation resources.**

**C7.2 I will, when using the resources of the Corporation or authorising their use by others:**

- a. act in accordance with the Corporation's requirements; and**
- b. ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the Corporation or of the office to which I have been elected or appointed.**

30. You may be provided with resources and facilities by the Corporation to assist you in carrying out your duties as a Member.

31. Examples include:

- office support
- stationery
- equipment such as phones, and computers
- transport
- access and use of Corporation buildings and rooms.

32. These are given to you to help you carry out your role as a Member more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the Corporation's own policies regarding their use.

## ***C8. Complying with the Code of Conduct***

**As a Member:**

**C8.1 [I undertake Code of Conduct training provided by the Corporation. / I familiarise myself with the Code of Conduct.]**

**C8.2 I cooperate with any Code of Conduct investigation and/or determination.**

**C8.3 I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.**

**C8.4 I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.**

33. It is extremely important for you as a Member to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the Corporation or its governance. If you do not understand or are concerned about the Corporation's processes in handling a complaint you should raise this with the Monitoring Officer or the Town Clerk.

## **Protecting your reputation and the reputation of the Corporation**

### ***C9. Interests***

#### **As a Member:**

##### **C9.1 I register and declare my interests.**

34. You need to register your interests so that the public, Corporation employees and fellow Members know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should declare an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be declared by you or other Members when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of governance is maintained.
35. You should note that failure to register or declare a disclosable pecuniary interest in relation to the Corporation's functions as a local authority or police authority may be a criminal offence under the Localism Act 2011.
36. Appendix B sets out the detailed provisions on registering and declaring interests. If in doubt, you should always seek advice from the Monitoring Officer or the Town Clerk.

### ***C10. Gifts and hospitality***

#### **As a Member:**

**C10.1 I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the Corporation or from persons who may apply to the Corporation for any permission, licence or other significant advantage.**

**C10.2 I register with the Monitoring Officer (via the Town Clerk) any gift or hospitality with an estimated value of at least [£50 / £100] within 28 days of its receipt.**

**C10.3 I register with the Monitoring Officer (via the Town Clerk) any significant gift or hospitality that I have been offered but have refused to accept.**

37. In order to protect your position and the reputation of the Corporation, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a Member. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register

gifts and hospitality which are not related to your role as a Member, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a Member. If you are unsure, do contact the Monitoring Officer or the Town Clerk for guidance. Special arrangements apply to the Lord Mayor and Sheriffs, as set out in guidance to be issued from time to time by the Civic Affairs Sub-Committee.



## **Appendices**

### **Appendix A – The Seven Principles of Public Life**

The principles are:

#### **Selflessness**

Holders of public office should act solely in terms of the public interest.

#### **Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

#### **Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

#### **Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

#### **Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

#### **Honesty**

Holders of public office should be truthful.

#### **Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## Appendix B

### Registering interests

1. Within 28 days of this Code of Conduct being adopted by the Corporation or your election or appointment to office (where that is later) you must register with the Monitoring Officer (via the Town Clerk) the interests which fall within the categories set out in Table 1 (Disclosable Pecuniary Interests). You must also register any interest which falls within Table 2 (Other Registerable Interests) as well as any other pecuniary or non-pecuniary interest which you consider should be included if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life.
2. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer (via the Town Clerk).
3. A 'sensitive interest' is as an interest which, if disclosed, could lead to the Member, or a person connected with the Member, being subject to violence or intimidation.
4. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

### Declaring interests and participation

5. Where you have a Disclosable Pecuniary Interest in any matter that arises at a meeting you must not participate in any discussion or vote on the matter unless you have been granted a dispensation. You must declare the interest if it has not already been entered onto the Corporation's register. If it is a 'sensitive interest', you do not have to declare the nature of the interest, just that you have an interest.
6. Your participation in any item of business:
  - a. in which you have any other interest; or
  - b. that affects a donor from whom you have received any gift or hospitality;

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

### Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.

<b>Sponsorship</b>	<p>Any payment or provision of any other financial benefit (other than from the Corporation) made to the Member during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a Member, or towards his/her election expenses.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>
<b>Contracts</b>	<p>Any contract made between the Member or his/her spouse or civil partner or the person with whom the Member is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the Corporation —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
<b>Land and Property</b>	<p>Any beneficial interest in land which is within the area of the Corporation.</p> <p>'Land' excludes an easement, servitude, interest or right in or over land which does not give the Member or his/her spouse or civil partner or the person with whom the Member is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
<b>Licences</b>	Any licence (alone or jointly with others) to occupy land in the area of the Corporation for a month or longer
<b>Corporate tenancies</b>	<p>Any tenancy where (to the Member's knowledge)—</p> <p>(a) the landlord is the Corporation; and</p> <p>(b) the tenant is a body that the Member, or his/her spouse or civil partner or the person with whom the Member is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
<b>Securities</b>	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the Member's knowledge) has a place of business or land in the area of the Corporation; and</p> <p>(b) either—</p>

	<p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the Member, or his/ her spouse or civil partner or the person with whom the Member is living as if they were spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>
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\* 'director' includes a member of the committee of management of an industrial and provident society.

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

**Table 2: Other Registerable Interests**

<b>Any Body of a description set out below of which you are a member or in a position of general control or management:</b>	
Club or Society active in the City of London or which relates to any functions of the Corporation	
Fraternal or Sororal Society	
Livery Company, City Company without Livery, Guild or Company seeking Livery	
Political Party	
Professional Association	
Trade Association	
Trade Union	
Any other Body -	(a) exercising functions of a public nature;
	(b) directed to charitable purposes;
	(c) one of whose principal purposes includes the influence of public opinion or policy; or
	(d) to which you are appointed or nominated by the Corporation
but excluding any position on a Committee or Court of the Corporation.	

## Appendix C

### IHRA Definition of Antisemitism

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

### IHRA Working Examples

2. Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for “why things go wrong.” It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.
3. Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:
  - Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
  - Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
  - Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
  - Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
  - Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
  - Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
  - Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
  - Applying double standards by requiring of it a behaviour not expected or demanded of any other democratic nation.
  - Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
  - Drawing comparisons of contemporary Israeli policy to that of the Nazis.
  - Holding Jews collectively responsible for actions of the state of Israel.
4. **Antisemitic acts are criminal** when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

5. **Criminal acts are antisemitic** when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.
6. **Antisemitic discrimination** is the denial to Jews of opportunities or services available to others and is illegal in many countries.



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

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

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

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

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

2. As a Member your conduct shall in particular address the Seven Principles of Public Life by:
- a) Championing the public interest, taking into account the needs of your constituents, including those that did not vote for you, and the community as a whole.
  - b) Dealing with representations or enquiries from residents, City voters, members of our communities and visitors fairly, appropriately and impartially.
  - c) Not allowing other pressures, including the financial interests of yourself or others connected to you, to deter you from pursuing constituents' casework, the interests of the Corporation or the good governance of the Corporation in a proper manner.
  - d) Exercising independent judgement and not compromising your position by allowing individuals or organisations to improperly influence you in the performance of your official duties by means of any financial or other obligations.
  - e) Listening to the interests of all parties, including relevant advice from statutory and other professional officers, taking all relevant information into consideration, remaining objective and making decisions on merit.
  - f) Being accountable for your decisions and co-operating when scrutinised internally and externally, including by constituents.
  - g) Contributing to making the Corporation's decision-making processes as open and transparent as possible to enable constituents to understand the reasoning behind those decisions and to be informed when holding you and other Members to account, and not seeking to prevent any person from obtaining information that they are entitled to by law.
  - h) Restricting access to information when the wider public interest or the law requires it, and not disclosing confidential information, unless you are entitled to by law – refer to the Monitoring Officer if you are unsure.
  - i) Behaving in accordance with all of the Corporation's legal obligations, alongside any requirements contained within the Corporation's policies, protocols or procedures, including on the use of the Corporation's resources.
  - j) Ensuring that, when using or authorising the use by others of the resources of the Corporation, such resources are not used improperly for political purposes (including party political purposes) and having regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.
  - k) Valuing your colleagues and officers of the Corporation and engaging with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance.
  - l) Always treating people with respect, including the organisations and constituents that you engage with and those that you work alongside, and not bullying, harassing (including sexually harassing), intimidating or attempting to intimidate any person. (See Appendix 1 for definitions of bullying and harassment.)



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

### **Registering and declaring pecuniary and non-pecuniary interests**

3. You must, within 28 days of taking office as a Member, notify the Town Clerk (on behalf of the Corporation's Monitoring Officer) of any disclosable pecuniary interest as defined by regulations made by the Secretary of State, where the pecuniary interest is yours, your spouse's or civil partner's, or is the pecuniary interest of somebody with whom you are living with as a husband or wife, or as if you were civil partners, together with any non-pecuniary interests of yours described in paragraph 7 below and thereafter maintain an up to date register of any such interests.
4. The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 (Appendix 3) currently define disclosable pecuniary interests under the following categories:
  - a) Employment, office, trade, profession or vocation
  - b) Sponsorship
  - c) Contracts
  - d) Land
  - e) Licences
  - f) Corporate tenancies
  - g) Securities
5. Where you believe you have a sensitive interest<sup>1</sup>, you should apply to the Monitoring Officer (via the Town Clerk) for exemption from the requirement that details of the interest be published and made available for inspection.
6. In addition, you must, within 28 days of taking office as a Member, and thereafter on an ongoing basis, notify the Corporation's Monitoring Officer (via the Town Clerk) of any other pecuniary or non-pecuniary interest which you consider should be included on

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

your Members' Declaration form if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life.

7. In any event you are required to disclose your membership of any:
  - (a) Management board or similar organ of any charity or body directed to a charitable purpose (e.g. a trustee or director) but excluding any charity or other such body administered by the Corporation
  - (b) Club or Society active in the City of London or which relates to any functions of the Corporation
  - (c) Fraternal or Sororal Societies
  - (d) Livery Company, City Company without Livery, Guild or Company seeking Livery
  - (e) Political Party
  - (f) Organisation, one of whose principal purposes includes the influence of public opinion or policy, and which is likely to seek to affect the policy of the Corporation or which may have an impact on its services or stakeholders
  - (g) Professional Association
  - (h) Trade Association
  - (i) Trade Union
  - (j) Management board or similar organ of any organisation not falling within paragraph 3 or sub-paragraphs (a)-(i) above.
8. You must also notify the Corporation's Monitoring Officer (via the Town Clerk) of any gift or hospitality received by you as a Member with a value of £100 or more, or multiple gifts and/or instances of hospitality with a cumulative value of £200 or more when received from a single donor within a rolling twelve month period. Such notification must be made within 28 days of receipt, or within 28 days of reaching the cumulative threshold, as appropriate.
9. Special provision shall be made for the Lord Mayor and other holders of special offices in relation to the registration of gifts and hospitality to be set out in Guidance to be issued by the Standards Committee.
10. Entries shall be retained in the register of gifts and hospitality for three years – older entries will be removed.
11. If an interest has not been entered onto the Corporation's register, then the Member must disclose the interest to any meeting of the Corporation at which they are present, where they have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'<sup>1</sup>.
12. Following any disclosure of an interest not on the Corporation's register or the subject of pending notification<sup>2</sup>, you must notify the Monitoring Officer (via the Town Clerk) of the interest within 28 days beginning with the date of disclosure.
13. Unless dispensation has been granted, you may not participate in any discussion of, vote on, or discharge any function related to any matter in which you have a pecuniary interest as defined by regulations made by the Secretary of State.

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

14. Your participation in any item of business:

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

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

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

**Definition of Bullying**

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

**Definition of Harassment**

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

## **IHRA Definition of Antisemitism**

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

## **IHRA Working Examples**

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

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

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

- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.

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

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

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

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STATUTORY INSTRUMENTS

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2012 No. 1464

## LOCAL GOVERNMENT, ENGLAND

The Relevant Authorities (Disclosable Pecuniary Interests)  
Regulations 2012

*Made* - - - - 6th June 2012

*Laid before Parliament* 8th June 2012

*Coming into force* - - 1st July 2012

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

**Citation, commencement and interpretation**

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

(2) In these regulations—

“the Act” means the Localism Act 2011;

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

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

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

“M” means a member of a relevant authority;

“member” includes a co-opted member;

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

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

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

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

**Specified pecuniary interests**

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

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

*Grant Shapps*  
Minister of State

6th June 2012

Department for Communities and Local Government

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<sup>(3)</sup> 2011 c.20.

<sup>(4)</sup> 2000 c. 8.

# SCHEDULE

Regulation 2

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

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<sup>(5)</sup> 1992 c. 52.



## **EXPLANATORY NOTE**

*(This note is not part of the Regulations)*

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

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

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## **Local Government Association**

### **Model Councillor Code of Conduct 2020**

#### **Joint statement**

The role of councillor across all tiers of local government is a vital part of our country's system of democracy. It is important that as councillors we can be held accountable and all adopt the behaviours and responsibilities associated with the role. Our conduct as an individual councillor affects the reputation of all councillors. We want the role of councillor to be one that people aspire to. We also want individuals from a range of backgrounds and circumstances to be putting themselves forward to become councillors.

As councillors, we represent local residents, work to develop better services and deliver local change. The public have high expectations of us and entrust us to represent our local area; taking decisions fairly, openly, and transparently. We have both an individual and collective responsibility to meet these expectations by maintaining high standards and demonstrating good conduct, and by challenging behaviour which falls below expectations.

Importantly, we should be able to undertake our role as a councillor without being intimidated, abused, bullied or threatened by anyone, including the general public.

This Code has been designed to protect our democratic role, encourage good conduct and safeguard the public's trust in local government.

## **Introduction**

The Local Government Association (LGA) has developed this Model Councillor Code of Conduct, in association with key partners and after extensive consultation with the sector, as part of its work on supporting all tiers of local government to continue to aspire to high standards of leadership and performance. It is a template for councils to adopt in whole and/or with local amendments.

All councils are required to have a local Councillor Code of Conduct.

The LGA will undertake an annual review of this Code to ensure it continues to be fit-for-purpose, incorporating advances in technology, social media and changes in legislation. The LGA can also offer support, training and mediation to councils and councillors on the application of the Code and the National Association of Local Councils (NALC) and the county associations of local councils can offer advice and support to town and parish councils.

## **Definitions**

For the purposes of this Code of Conduct, a “councillor” means a member or co-opted member of a local authority or a directly elected mayor. A “co-opted member” is defined in the Localism Act 2011 Section 27(4) as “a person who is not a member of the authority but who

- a) is a member of any committee or sub-committee of the authority, or;
- b) is a member of, and represents the authority on, any joint committee or joint sub-committee of the authority;

and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee”.

For the purposes of this Code of Conduct, “local authority” includes county councils, district councils, London borough councils, parish councils, town councils, fire and rescue authorities, police authorities, joint authorities, economic prosperity boards, combined authorities and National Park authorities.

## **Purpose of the Code of Conduct**

The purpose of this Code of Conduct is to assist you, as a councillor, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow councillors, local authority officers and the reputation of local government. It sets out general principles of conduct expected of all councillors and your specific obligations in relation to standards of conduct. The LGA encourages the use of support, training and mediation prior to action being taken using the Code. The fundamental aim of the Code is to create and maintain public confidence in the role of councillor and local government.

## **General principles of councillor conduct**

Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, councillors and local authority officers; should uphold the [Seven Principles of Public Life](#), also known as the Nolan Principles.

Building on these principles, the following general principles have been developed specifically for the role of councillor.

In accordance with the public trust placed in me, on all occasions:

- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect; and
- I lead by example and act in a way that secures public confidence in the role of councillor.

In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community
- I do not improperly seek to confer an advantage, or disadvantage, on any person
- I avoid conflicts of interest
- I exercise reasonable care and diligence; and
- I ensure that public resources are used prudently in accordance with my local authority's requirements and in the public interest.

## **Application of the Code of Conduct**

This Code of Conduct applies to you as soon as you sign your declaration of acceptance of the office of councillor or attend your first meeting as a co-opted member and continues to apply to you until you cease to be a councillor.

This Code of Conduct applies to you when:

- you are acting in your capacity as a councillor and/or as a representative of your council
- you are claiming to act as a councillor and/or as a representative of your council
- you are giving the impression that you are acting as a councillor and/or as a representative of your council
- you refer publicly to your role as a councillor or use knowledge you could only obtain in your role as a councillor.

The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

You are also expected to uphold high standards of conduct and show leadership at all times.

Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct, and you are encouraged to seek advice from your Monitoring Officer on any matters that may relate to the Code of Conduct. Town and parish councillors are encouraged to seek advice from their Clerk, who may refer matters to the Monitoring Officer.

## **Standards of councillor conduct**

This section sets out your obligations, which are the minimum standards of conduct required of you as a councillor. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

Guidance is included to help explain the reasons for the obligations and how they should be followed.

### **General Conduct**

#### **1. *Respect***

##### **As a councillor:**

**1.1 I treat other councillors and members of the public with respect.**

**1.2 I treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play.**

Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a councillor, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in councillors.

In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the local authority, the relevant social media provider or the police. This also applies to fellow councillors, where action could then be taken under the Councillor Code of Conduct, and local authority employees, where concerns should be raised in line with the local authority's councillor-officer protocol.

## ***2. Bullying, harassment and discrimination***

**As a councillor:**

**2.1 I do not bully any person.**

**2.2 I do not harass any person.**

**2.3 I promote equalities and do not discriminate unlawfully against any person.**

The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The Equality Act 2010 places specific duties on local authorities. Councillors have a central role to play in ensuring that equality issues are integral to the local authority's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services.

## ***3. Impartiality of officers of the council***

**As a councillor:**

**3.1 I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority.**

Officers work for the local authority as a whole and must be politically neutral (unless they are political assistants). They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

**4. Confidentiality and access to information**

**As a councillor:**

**4.1 I do not disclose information:**

- a. given to me in confidence by anyone
- b. acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless
  - i. I have received the consent of a person authorised to give it;
  - ii. I am required by law to do so;
  - iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
  - iv. the disclosure is:
    - 1. reasonable and in the public interest; and
    - 2. made in good faith and in compliance with the reasonable requirements of the local authority; and
    - 3. I have consulted the Monitoring Officer prior to its release.

**4.2 I do not improperly use knowledge gained solely as a result of my role as a councillor for the advancement of myself, my friends, my family members, my employer or my business interests.**

**4.3 I do not prevent anyone from getting information that they are entitled to by law.**

Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the local authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

**5. Disrepute**

**As a councillor:**



### **5.1 I do not bring my role or local authority into disrepute.**

As a councillor, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other councillors and/or your local authority and may lower the public's confidence in you or your local authority's ability to discharge your/its functions. For example, behaviour that is considered dishonest and/or deceitful can bring your local authority into disrepute.

You are able to hold the local authority and fellow councillors to account and are able to constructively challenge and express concern about decisions and processes undertaken by the council whilst continuing to adhere to other aspects of this Code of Conduct.

## **6. *Use of position***

**As a councillor:**

### **6.1 I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.**

Your position as a member of the local authority provides you with certain opportunities, responsibilities and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

## **7. *Use of local authority resources and facilities***

**As a councillor:**

### **7.1 I do not misuse council resources.**

### **7.2 I will, when using the resources of the local or authorising their use by others:**

- a. act in accordance with the local authority's requirements; and**
- b. ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the local authority or of the office to which I have been elected or appointed.**

You may be provided with resources and facilities by the local authority to assist you in carrying out your duties as a councillor.

Examples include:

- office support
- stationery
- equipment such as phones, and computers
- transport
- access and use of local authority buildings and rooms.

These are given to you to help you carry out your role as a councillor more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the local authority's own policies regarding their use.

## **8. *Complying with the Code of Conduct***

**As a councillor:**

**8.1 I undertake Code of Conduct training provided by my local authority.**

**8.2 I cooperate with any Code of Conduct investigation and/or determination.**

**8.3 I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.**

**8.4 I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.**

It is extremely important for you as a councillor to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the local authority or its governance. If you do not understand or are concerned about the local authority's processes in handling a complaint you should raise this with your Monitoring Officer.

## **Protecting your reputation and the reputation of the local authority**

### **9. *Interests***

**As a councillor:**

**9.1 I register and declare my interests.**

You need to register your interests so that the public, local authority employees and fellow councillors know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should declare an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be declared by you or other councillors when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

You should note that failure to register or declare a disclosable pecuniary (i.e. financial) interest is a criminal offence under the Localism Act 2011.

Appendix B sets out the detailed provisions on registering and declaring interests. If in doubt, you should always seek advice from your Monitoring Officer.

## ***10. Gifts and hospitality***

**As a councillor:**

**10.1 I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the local authority or from persons who may apply to the local authority for any permission, licence or other significant advantage.**

**10.2 I register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.**

**10.3 I register with the Monitoring Officer any significant gift or hospitality that I have been offered but have refused to accept.**

In order to protect your position and the reputation of the local authority, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a councillor. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register gifts and hospitality which are not related to your role as a councillor, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a councillor. If you are unsure, do contact your Monitoring Officer for guidance.

# **Appendices**

## **Appendix A – The Seven Principles of Public Life**

The principles are:

### **Selflessness**

Holders of public office should act solely in terms of the public interest.

### **Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

### **Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

### **Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

### **Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

### **Honesty**

Holders of public office should be truthful.

### **Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## Appendix B

### Registering interests

1. Within 28 days of this Code of Conduct being adopted by the local authority or your election or appointment to office (where that is later) you must register with the Monitoring Officer the interests which fall within the categories set out in Table 1 (Disclosable Pecuniary Interests) and Table 2 (Other Registerable Interests). Disclosable Pecuniary Interests means issues relating to money and finances.
2. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
3. A 'sensitive interest' is as an interest which, if disclosed, could lead to the councillor/member or co-opted member, or a person connected with the member or co-opted member, being subject to violence or intimidation.
4. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

### Declaring interests

5. Where a matter arises at a meeting which directly relates one of your Disclosable Pecuniary Interests, you must declare the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest, just that you have an interest.
6. Where a matter arises at a meeting which directly relates to one of your Other Registerable Interests, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', again you do not have to declare the nature of the interest.
7. Where a matter arises at a meeting which *directly relates* to your financial interest or well-being (and is not a Disclosable Pecuniary Interest) or a financial interest or well-being of a relative or close associate, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room

unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest.

8. Where a matter arises at a meeting which *affects* –
  - a. your own financial interest or well-being;
  - b. a financial interest or well-being of a friend, relative, close associate; or
  - c. a body included in those you need to declare under Disclosable Pecuniary Interests

you must disclose the interest.

9. Where the matter affects the financial interest or well-being:
  - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
  - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest.

**Table 1: Disclosable Pecuniary Interests**

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

<b>Subject</b>	<b>Description</b>
<b>Employment, office, trade, profession or vocation</b>	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
<b>Sponsorship</b>	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
<b>Contracts</b>	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	<p>councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
<b>Land and Property</b>	<p>Any beneficial interest in land which is within the area of the council.</p> <p>‘Land’ excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
<b>Licences</b>	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
<b>Corporate tenancies</b>	<p>Any tenancy where (to the councillor’s knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
<b>Securities</b>	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor’s knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/ her spouse or civil partner or the person with whom the councillor is living as if they were</p>

	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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\* 'director' includes a member of the committee of management of an industrial and provident society.

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

**Table 2: Other Registerable Interests**

<b>Any Body of which you are a member or in a position of general control or management and to which you are appointed or nominated by the council;</b>	
Any Body -	(a) exercising functions of a public nature;
	(b) directed to charitable purposes; or
	(c) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)
of which you are a member or in a position of general control or management.	



## **Appendix C – the Committee on Standards in Public Life**

The LGA has undertaken this review whilst the Government continues to consider the recommendations made by the Committee on Standards in Public Life in their report on [Local Government Ethical Standards](#). If the Government chooses to implement any of the recommendations, this could require a change to this Code.

The recommendations cover:

- Recommendations for changes to the Localism Act 2011 to clarify in law when the Code of Conduct applies
- The introduction of sanctions
- An appeals process through the Local Government Ombudsman
- Changes to the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012
- Updates to the Local Government Transparency Code
- Changes to the role and responsibilities of the Independent Person
- That the criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished

The Local Government Ethical Standards report also includes Best Practice recommendations. These are:

Best practice 1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.

Best practice 2: Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation and prohibiting trivial or malicious allegations by councillors.

Best practice 3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.

Best practice 4: An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.

Best practice 5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.

Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.

Best practice 7: Local authorities should have access to at least two Independent Persons.

Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to

review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.

Best practice 9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.

Best practice 10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.

Best practice 11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council as a whole, rather than the clerk in all but exceptional circumstances.

Best practice 12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.

Best practice 13: A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.

Best practice 14: Councils should report on separate bodies they have set up or which they own as part of their annual governance statement and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness and publish their board agendas and minutes and annual reports in an accessible place.

Best practice 15: Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.

The LGA has committed to reviewing the Code on an annual basis to ensure it is still fit for purpose.

Adopted by the Court of Common Council on xxx.



## CODE OF CONDUCT FOR MEMBERS

### Introduction

1. The Localism Act 2011 requires a relevant authority to promote and maintain high standards of conduct by its members and co-opted members and to adopt a Code dealing with the conduct that is expected of them when they are acting in that capacity.
2. The legislation only applies to the City of London Corporation ("the Corporation") in its capacity as a local authority or police authority. The Corporation has, however, chosen to apply this Code to all of its functions.
3. The statutory provisions only apply to elected members and co-opted members with voting rights. However, this Code is applied to any member of the Corporation and any member of a committee or sub-committee of the Corporation (collectively referred to as a "Member").
4. This Code is largely based on the Model Councillor Code of Conduct developed by the Local Government Association, with some local differences.

### Purpose of the Code of Conduct

5. The purpose of this Code of Conduct is to assist you, as a **Member**, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow **Members**, officers and the reputation of **the Corporation**. It sets out general principles of conduct expected of all **Members** and your specific obligations in relation to standards of conduct. The **Corporation** encourages the use of support, training and mediation prior to action being taken using the Code. The fundamental aim of the Code is to create and maintain public confidence in the role of **Member** and **the Corporation**.

### General principles of **Member** conduct

6. Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, councillors and local authority officers; should uphold the **Seven Principles of Public Life**, also known as the Nolan Principles.
7. Building on these principles, the following general principles have been developed specifically for the role of **Member**.
8. In accordance with the public trust placed in me, on all occasions:

#### **Deleted:** Local Government Association Model Councillor Code of Conduct 2020

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#### **Joint statement**

The role of councillor across all tiers of local government is a vital part of our country's system of democracy. It is important that as councillors we can be held accountable and all adopt the behaviours and responsibilities associated with the role. Our conduct as an individual councillor affects the reputation of all councillors. We want the role of councillor to be one that people aspire to. We also want individuals from a range of backgrounds and circumstances to be putting themselves forward to become councillors.¶  
As councillors, we represent local residents, work to develop better services and deliver local change. The public have high expectations of us and entrust us to represent our local area; taking decisions fairly, openly, and transparently. We have both an individual and collective responsibility to meet these expectations by maintaining high standards and demonstrating good conduct, and by challenging behaviour which falls below expectations.¶  
Importantly, we should be able to undertake our role as a councillor without being intimidated, abused, bullied or threatened by anyone, including the general public.¶  
This Code has been designed to protect our democratic role, encourage good conduct and safeguard the public's trust in local government.¶

**Deleted:** The Local Government Association (LGA) has developed this Model Councillor Code of Conduct, in association with key partners and after extensive consultation with the sector, as part of its work on supporting all tiers of local government to continue to aspire to high standards of leadership and performance. It is a template for councils to adopt in whole and/or with local amendments.¶  
All councils are required to have a local Councillor Code of Conduct.¶

The LGA will undertake an annual review of this Code to ensure it continues to be fit-for-purpose, incorporating advances in technology, social media and changes in legislation. The LGA can also offer support, training and mediation to councils and councillors on the application of the Code and the National Association of Local Councils (NALC) and the county associations of local councils can offer advice and support to town and parish councils.¶

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#### **Definitions**

For the purposes of this Code of Conduct, a "councillor" means a member or co-opted member of a local authority or a directly elected mayor. A "co-opted member" is defined in the Localism Act 2011 Section 27(4) as "a person who is not a member of the authority but who"¶  
is a member of any committee or sub-committee of the authority, or,¶  
is a member of, and represents the authority on, any joint committee or joint sub-committee of the authority;¶  
and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee".¶  
For the purposes of this Code of Conduct, "local authority" ...

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**Deleted:** **Seven Principles of Public Life**,

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- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect; and
- I lead by example and act in a way that secures public confidence in the role of Member.

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9. In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community
- I do not improperly seek to confer an advantage, or disadvantage, on any person
- I avoid conflicts of interest
- I exercise reasonable care and diligence; and
- I ensure that public resources are used prudently in accordance with the Corporation's requirements and in the public interest.

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### Application of the Code of Conduct

10. This Code of Conduct applies to you as soon as you make your declaration of office or attend your first meeting (as a co-opted member) and continues to apply to you until you cease to be a Member.

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11. This Code of Conduct applies to you when:

- you are acting in your capacity as a Member and/or as a representative of the Corporation
- you are claiming to act as a Member and/or as a representative of the Corporation
- you are giving the impression that you are acting as a Member and/or as a representative of the Corporation
- you refer publicly to your role as a Member or use knowledge you could only obtain in your role as a Member.

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12. The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

13. You are also expected to uphold high standards of conduct and show leadership at all times.

14. You are encouraged to seek advice from the Monitoring Officer or the Town Clerk on any matters that may relate to the Code of Conduct.

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Deleted: Town and parish councillors are encouraged to seek advice from their Clerk, who may refer matters to the Monitoring Officer....

### Standards of Member conduct

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15. This section sets out your obligations, which are the minimum standards of conduct required of you as a Member. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

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16. Guidance is included to help explain the reasons for the obligations and how they should be followed.

## General Conduct

### C1. Respect

As a Member:

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C1.1 I treat other Members and members of the public with respect.

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C1.2 I treat Corporation employees, employees and representatives of partner organisations and those volunteering for the Corporation with respect and respect the role they play.

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17. Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a Member, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

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18. In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in Members.

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19. In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the Corporation, the relevant social media provider or the police. This also applies to fellow Members, where action could then be taken under the Member Code of Conduct, and Corporation employees, where concerns should be raised in line with the Corporation's Member / Officer Charter.

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### C2. Bullying, harassment and discrimination

As a Member:

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C2.1 I do not bully any person.

C2.2 I do not harass any person.

C2.3 I promote equalities and do not discriminate unlawfully against any person.

20. The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on

social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

21. The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

22. Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

23. The Equality Act 2010 places specific duties on the Corporation. Members have a central role to play in ensuring that equality issues are integral to the Corporation's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services. The Corporation has adopted the International Holocaust Remembrance Alliance definition of antisemitism (see Appendix C).

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### **C3. Impartiality of officers of the Corporation**

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As a **Member**:

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**C3.1** I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the Corporation.

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24. Officers work for the Corporation as a whole and must be politically neutral. They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

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Deleted: (unless they are political assistants).

### **C4. Confidentiality and access to information**

As a **Member**:

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**C4.1** I do not disclose information:

- a. given to me in confidence by anyone
- b. acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless
  - i. I have received the consent of a person authorised to give it;
  - ii. I am required by law to do so;
  - iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
  - iv. the disclosure is:
    1. reasonable and in the public interest; and

2. made in good faith and in compliance with the reasonable requirements of the local authority; and
3. I have consulted the Monitoring Officer prior to its release.

**C4.2** I do not improperly use knowledge gained solely as a result of my role as a **Member** for the advancement of myself, my friends, my family members, my employer or my business interests.

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**C4.3** I do not prevent anyone from getting information that they are entitled to by law.

25. Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the **Corporation** must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

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## **C5. Disrepute**

As a **Member**:

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**C5.1** I do not bring my role or **the Corporation** into disrepute.

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26. As a **Member**, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other **Members** and/or **the Corporation** and may lower the public's confidence in your or **the Corporation's** ability to discharge your/**its** functions. For example, behaviour that is considered dishonest and/or deceitful can bring **the Corporation** into disrepute.

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27. You are able to hold the **Corporation** and fellow **Members** to account and are able to constructively challenge and express concern about decisions and processes undertaken by the **Corporation** whilst continuing to adhere to other aspects of this Code of Conduct.

## **C6. Use of position**

As a **Member**:

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**C6.1** I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.

**C6.2** Where taking decisions on behalf of a charity I act in the best interests of that charity and manage any conflicts of interest or loyalty.

28. Your position as a **Member** of the **Corporation** provides you with certain opportunities, responsibilities and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

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29. When acting on behalf of a charity for which the Corporation is the corporate trustee you are also required to comply with any conflicts of interest policy that has been adopted.

#### **C7. Use of Corporation resources and facilities**

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As a **Member**:

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**C7.1** I do not misuse **Corporation** resources.

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**C7.2** I will, when using the resources of the **Corporation** or authorising their use by others:

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- a. act in accordance with the **Corporation's** requirements; and
- b. ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the **Corporation** or of the office to which I have been elected or appointed.

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30. You may be provided with resources and facilities by the **Corporation** to assist you in carrying out your duties as a **Member**.

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31. Examples include:

- office support
- stationery
- equipment such as phones, and computers
- transport
- access and use of **Corporation** buildings and rooms.

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32. These are given to you to help you carry out your role as a **Member** more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the **Corporation's** own policies regarding their use.

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#### **C8. Complying with the Code of Conduct**

As a **Member**:

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**C8.1** [I undertake Code of Conduct training provided by **the Corporation**. / I familiarise myself with the Code of Conduct.]

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**C8.2** I cooperate with any Code of Conduct investigation and/or determination.

**C8.3** I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.

**C8.4** I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.

33. It is extremely important for you as a **Member** to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the

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Corporation or its governance. If you do not understand or are concerned about the Corporation's processes in handling a complaint you should raise this with the Monitoring Officer or the Town Clerk.

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## Protecting your reputation and the reputation of the Corporation

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### C9. Interests

As a Member:

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#### C9.1 I register and declare my interests.

34. You need to register your interests so that the public, Corporation employees and fellow Members know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should declare an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be declared by you or other Members when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of governance is maintained.

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35. You should note that failure to register or declare a disclosable pecuniary interest in relation to the Corporation's functions as a local authority or police authority may be a criminal offence under the Localism Act 2011.

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36. Appendix B sets out the detailed provisions on registering and declaring interests. If in doubt, you should always seek advice from the Monitoring Officer or the Town Clerk.

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### C10. Gifts and hospitality

As a Member:

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C10.1 I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the Corporation or from persons who may apply to the Corporation for any permission, licence or other significant advantage.

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C10.2 I register with the Monitoring Officer (via the Town Clerk) any gift or hospitality with an estimated value of at least [£50 / £100] within 28 days of its receipt.

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C10.3 I register with the Monitoring Officer (via the Town Clerk) any significant gift or hospitality that I have been offered but have refused to accept.

37. In order to protect your position and the reputation of the Corporation, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably

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believe to be) offered to you because you are a Member. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register gifts and hospitality which are not related to your role as a Member, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a Member. If you are unsure, do contact the Monitoring Officer or the Town Clerk for guidance. Special arrangements apply to the Lord Mayor and Sheriffs, as set out in guidance to be issued from time to time by the Civic Affairs Sub-Committee.

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## **Appendices**

### **Appendix A – The Seven Principles of Public Life**

The principles are:

#### **Selflessness**

Holders of public office should act solely in terms of the public interest.

#### **Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

#### **Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

#### **Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

#### **Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

#### **Honesty**

Holders of public office should be truthful.

#### **Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## Appendix B

### Registering interests

1. Within 28 days of this Code of Conduct being adopted by the Corporation or your election or appointment to office (where that is later) you must register with the Monitoring Officer (via the Town Clerk) the interests which fall within the categories set out in Table 1 (Disclosable Pecuniary Interests). You must also register any interest which falls within Table 2 (Other Registerable Interests) as well as any other pecuniary or non-pecuniary interest which you consider should be included if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life.
2. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer (via the Town Clerk).
3. A 'sensitive interest' is as an interest which, if disclosed, could lead to the Member, or a person connected with the Member, being subject to violence or intimidation.
4. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

### Declaring interests and participation

5. Where you have a Disclosable Pecuniary Interest in any matter that arises at a meeting you must not participate in any discussion or vote on the matter unless you have been granted a dispensation. You must declare the interest if it has not already been entered onto the Corporation's register. If it is a 'sensitive interest', you do not have to declare the nature of the interest, just that you have an interest.

#### 6. Your participation in any item of business:

a. in which you have any other interest; or

b. that affects a donor from whom you have received any gift or hospitality;

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

**Table 1: Disclosable Pecuniary Interests**

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.

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**Deleted:** which directly relates one of your Disclosable Pecuniary Interests,

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**Deleted:** <#>Where a matter arises at a meeting which directly relates to one of your Other Registerable Interests, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', again you do not have to declare the nature of the interest.¶

¶ Where a matter arises at a meeting which *directly relates* to your financial interest or well-being (and is not a Disclosable Pecuniary Interest) or a financial interest or well-being of a relative or close associate, you must declare the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room¶ unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to declare the nature of the interest.¶

¶ Where a matter arises at a meeting which *affects* -¶

your own financial interest or well-being,¶

a financial interest or well-being of a friend, relative, close

associate; or¶

a body included in those you need to declare under Disclosable

Pecuniary Interests¶

you must disclose the interest.¶

¶

Where the matter affects the financial interest or well-being:¶

to a greater extent than it affects the financial interests of the

majority of inhabitants of the ward affected by the decision and;¶

a reasonable member of the public knowing all the facts would

believe that it would affect your view of the wider public interest¶

you must declare the interest. You may speak on the

matter only if members of the public are also allowed to

speak at the meeting but otherwise must not take part in

any discussion or vote on the matter and must not remain

in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to declare the

nature of the interest.¶

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[Any unpaid directorship.]

<b>Sponsorship</b>	Any payment or provision of any other financial benefit (other than from the <u>Corporation</u> ) made to the <u>Member</u> during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a <u>Member</u> , or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
<b>Contracts</b>	Any contract made between the <u>Member</u> or his/her spouse or civil partner or the person with whom the <u>Member</u> is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the <u>Corporation</u> — (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
<b>Land and Property</b>	Any beneficial interest in land which is within the area of the <u>Corporation</u> . 'Land' excludes an easement, servitude, interest or right in or over land which does not give the <u>Member</u> or his/her spouse or civil partner or the person with whom the <u>Member</u> is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.
<b>Licences</b>	Any licence (alone or jointly with others) to occupy land in the area of the <u>Corporation</u> for a month or longer
<b>Corporate tenancies</b>	Any tenancy where (to the <u>Member's</u> knowledge)— (a) the landlord is the <u>Corporation</u> ; and (b) the tenant is a body that the <u>Member</u> , or his/her spouse or civil partner or the person with whom the <u>Member</u> is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.
<b>Securities</b>	Any beneficial interest in securities* of a body where— (a) that body (to the <u>Member's</u> knowledge) has a place of business or land in the area of the <u>Corporation</u> ; and (b) either—

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	<p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the <u>Member</u>, or his/ her spouse or civil partner or the person with whom the <u>Member</u> is living as if they were spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>
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\* 'director' includes a member of the committee of management of an industrial and provident society.

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

**Table 2: Other Registerable Interests**

<b>Any Body of <u>a description set out below of</u> which you are a member or in a position of general control or management:</b>	
<u>Club or Society active in the City of London or which relates to any functions of the Corporation</u>	
<u>Fraternal or Sororal Society</u>	
<u>Livery Company, City Company without Livery, Guild or Company seeking Livery</u>	
<u>Political Party</u>	
<u>Professional Association</u>	
<u>Trade Association</u>	
<u>Trade Union</u>	
Any <u>other</u> Body -	(a) exercising functions of a public nature;
	(b) directed to charitable purposes;
	(c) one of whose principal purposes includes the influence of public opinion or policy; or
	<u>(d) to which you are appointed or nominated by the Corporation</u>
<u>but excluding any position on a Committee or Court of the Corporation.</u>	

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## Appendix C

### IHRA Definition of Antisemitism

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

### IHRA Working Examples

2. Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for "why things go wrong." It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.
3. Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:
  - Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
  - Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
  - Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
  - Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
  - Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
  - Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
  - Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
  - Applying double standards by requiring of it a behaviour not expected or demanded of any other democratic nation.
  - Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
  - Drawing comparisons of contemporary Israeli policy to that of the Nazis.
  - Holding Jews collectively responsible for actions of the state of Israel.
4. Antisemitic acts are criminal when they are so defined by law (for example, denial of the Holocaust or distribution of antisemitic materials in some countries).

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**Deleted:** The LGA has undertaken this review whilst the Government continues to consider the recommendations made by the Committee on Standards in Public Life in their report on [Local Government Ethical Standards](#). If the Government chooses to implement any of the recommendations, this could require a change to this Code.¶  
The recommendations cover:¶  
Recommendations for changes to the Localism Act 2011 to clarify in law when the Code of Conduct applies¶  
The introduction of sanctions¶  
An appeals process through the Local Government Ombudsman¶  
Changes to the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012¶  
Updates to the Local Government Transparency Code¶  
Changes to the role and responsibilities of the Independent Person¶  
That the criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished¶  
The Local Government Ethical Standards report also includes Best Practice recommendations. These are:¶  
Best practice 1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.¶  
Best practice 2: Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation and prohibiting trivial or malicious allegations by councillors.¶  
Best practice 3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.¶  
Best practice 4: An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.¶  
Best practice 5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.¶  
Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.¶  
Best practice 7: Local authorities should have access to at least two Independent Persons.¶  
Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to¶  
review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.¶  
Best practice 9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.¶  
Best practice 10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.¶  
Best practice 11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council as a whole, rather than the clerk in all but exceptional circumstances.¶  
Best practice 12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.¶  
Best practice 13: A local authority should have procedures in place to address any conflicts of interest when undertaking { ...

5. **Criminal acts are antisemitic** when the targets of attacks, whether they are people or property – such as buildings, schools, places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.
6. **Antisemitic discrimination** is the denial to Jews of opportunities or services available to others and is illegal in many countries.



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

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