



Member Development and Standards Sub Committee

Date: WEDNESDAY, 17 JULY 2024
Time: 11.00 am
Venue: COMMITTEE ROOM 2, 2ND FLOOR, WEST WING, GUILDHALL

Members: Deputy Peter Dunphy, Chief Commoner (Chair)
Helen Fentimen OBE JP (Deputy Chair)
Deputy Keith Bottomley
Anthony Fitzpatrick
Alderman Alison Gowman CBE
Steve Goodman OBE
Deputy Christopher Hayward
Deputy Ann Holmes
Deputy Edward Lord
Eamonn Mullally
Deputy Nighat Qureishi
Naresh Sonpar
Philip Woodhouse

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

Part 1 Public Agenda

1. **APOLOGIES**

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

3. **PUBLIC MINUTES**

To agree the public minutes and non-public summary of the meeting held on 8 March 2024.

For Decision
(Pages 5 - 12)

STANDARDS ITEMS

4. **MEMBERS CODE OF CONDUCT**

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

For Decision
(Pages 13 - 88)

5. **INDEPENDENT REVIEW OF MEMBER BEHAVIOUR (LOCAL GOVERNMENT ASSOCIATION) – PROPOSED ACTION PLAN**

Report of the Town Clerk.

For Decision
(Pages 89 - 120)

6. **PANEL OF INDEPENDENT PERSONS - REPORT**

Report of the Town Clerk.

For Information
(Pages 121 - 134)

Member Development Items

7. **MEMBER LEARNING AND DEVELOPMENT UPDATE**

Report of the Town Clerk.

For Information
(Pages 135 - 146)

8. **MEMBER INDUCTION ARRANGEMENTS 2025**

Report of the Town Clerk.

For Decision
(Pages 147 - 160)

Part 2 Non Public Agenda

9. NON-PUBLIC MINUTES

To agree the non-public minutes of the previous meeting held on 8 March 2024.

For Decision
(Pages 161 - 162)

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

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

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MEMBER DEVELOPMENT AND STANDARDS SUB COMMITTEE

Friday, 8 March 2024

Minutes of the meeting of the Member Development and Standards Sub Committee held at COMMITTEE ROOM, 2ND Floor. GUILDHALL on Friday, 8 March 2024 at 11.00 am

Present:

Members:

Deputy Ann Holmes (Chief Commoner) (Chair)
Deputy Peter Dunphy (Chief Commoner Elect)
Anthony David Fitzpatrick
John Griffiths
Alderman Alison Gowman
Deputy Charles Edward Lord
Eamonn Mullally
Naresh Hari Sonpar

Observing Virtually

Helen Fentimen (Deputy Chairman)
Deputy Nighat Qureishi

Officers:

Greg Moore	- Deputy Town Clerk
Polly Dunn	- Assistant Town Clerk, Executive Director, Governance & Member Services
Gemma Stokely	- Town Clerk's Department
June Haynes	- Town Clerk's Department
Edward Wood	- Comptroller and City Solicitor's Department
Scott Caizley	- Community & Children's Services Department
Torriano Stewart	- Community & Children's Services Department

1. APOLOGIES

Apologies for absence were received from Munsur Ali and Deputy Christopher Hayward. Helen Fentimen and Deputy Nighat Qureishi also issued apologies, but observed the meeting online.

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

There were no declarations.

3. **PUBLIC MINUTES**

The Sub-Committee considered the public minutes and non-public summary of their last meeting held on 15 December 2023.

RESOLVED, that the minutes of the meeting held on 15 December 2023, be approved them as a correct record.

4. **MEMBERS CODE OF CONDUCT**

The Sub-Committee received an update from the Comptroller and City Solicitor regarding the outcome of a recent consultation which canvassed the comments and views from Members and co-optees in relation to the Members Code of Conduct. The Comptroller and City Solicitor will present a full report to the Sub-Committee at its next meeting.

RECEIVED.

5. **INDEPENDENT REVIEW OF MEMBER BEHAVIOUR (LOCAL GOVERNMENT ASSOCIATION)**

The Sub-Committee considered a report of the Town Clerk which detailed recommendations and findings of the Local Government Association's independent review of Members behaviour. The review having been commissioned by the Town Clerk, supported by the Chief Commoner and Policy Chairman.

By way of consultation, the document had been shared with the full Court membership at their meeting of Informal Court in February 2024, this had allowed for discussion in advance of a formal response to this Sub-Committee, the Policy and Resources Committee and, ultimately, the Court of Common Council for adoption.

To further direct and instruct the Town Clerk in terms of next steps, the Sub-Committee reflected and responded to questions posed in paragraph 7 of the document, with the aim of, under delegated authority, instructing officers to devise an action plan to be further considered in advance of its adoption.

The Chief Commoner reflected on the code of conduct and sanctioned mandatory training for specific core elements such as the role of committee chairman, with the potential instruction that Members were unlikely to chair a committee if they had not completed the training.

The Town Clerk suggested a common-sense approach to the action plan which felt appropriate. Members acknowledged that implementation of the code required a key culture shift and that not all Members would engage and take responsibility for challenging poor behaviour.

The Sub-Committee discussed, in turn, the key points raised in paragraph 7 of the independent review document. Considering 7a of the paper, what does “good” look like, it was agreed that a Corporation Mission Statement was a good idea and could feature on the homepage of, the Corporation’s website. Members further suggested that in addition to what “good” looks like there should also be a statement, in the avoidance of doubt, referencing “what is not acceptable” behaviours. The Sub-Committee were conscious of the requirement to address the disconnect between what we think we are and how we are perceived as an organisation. Training and cultural competence would be incorporated alongside the Sub-Committee’s comments into the final document.

There were no changes suggested to 7b of the paper, which related to messaging around expectations and standards of behaviour. It was commented that this could be reinforced by the mission statement as it would appear on the intranet homepage.

The introduction of a “buddying” system for new Members was discussed at 7c, which was received and supported by the Sub-Committee, however the suggestion that a pool of ward deputies was not favoured or supported by Members generally and an alternative approach of a register of volunteers was preferred. It was recognised that seniority was not an indication of appropriateness for the role. Volunteers would be requested to provide a written statement with reasons why they felt they would make a good buddy, what experiences, skills and expertise they would bring to the role, this would give new Members a menu of choice and would also focus Members to update their own skills, expertise and interests register.

The Chief Elect commented that this approach could foster the buddying relationships for new Members as they join committees, the respective Chairs and Deputy Chairs as experts in the business and portfolio of their committee, imparting knowledge in terms of their role and responsibilities. The Town Clerk, reminded Members that some existing deputies were new to their role and to the Court in 2022 and they would have benefited from that level of support.

Mandatory training for chairs, as detailed in 7d of the document was not generally received well by Members as debated at Informal Court, some Members argued that the necessary skills had been acquired organically by serving on a committee. Some existing chairs had started the process of asking for feedback on their performance; this approach was welcomed by the Sub-Committee agreeing that feedback would support performance if done in a clear and dignified way and used as a period of reflection; the need for acceptance of negativity whilst still being enlightened. Members also considered chairs and deputies observing a range of committees to determine what “good” looks like. The Chief Elect discussed the possible introduction of an annual survey to measure chairs’ performance, this would capture those who had been either reluctant or unaware of others concerns. The Town Clerk was encouraged by the suggestion of an annual appraisal process, and proposed that a general service provision questionnaire for the Governance and Member Services Team could contain potential questions to help identify

where changes to committee conduct, process and procedure may be useful, alongside identifying training needs more broadly. This could be tested with the Sub-Committee to enable the identification of specific concerns are related to chairing.

Reflecting on comments made at 7e, measuring success in terms of the revised pre-complaint protocol, the Chief Commoner had successfully performed as an internal mediator for Member on Member complaints. There had been some appetite for the introduction of a similar process for Member on officer complaints.

The focus of “allyship” in 7f and the support for Members to call out bad behaviours, the Sub-Committee felt that this would be predominantly the role of the committee chair as they would be best placed to correct the situation without being personal and support from the EDI Sub-Committee as they could act as champions. Members commented that the City should also continue to aim to be a culture of openness and transparency, which is highlighted through the code of conduct, the build on an environment of learning and making better decisions which supports the City as a learning organisation whose commitment and aims were demonstrated through the Learning and Development Strategy.

The Sub-Committee were in agreement that once the document had comments incorporated the final report should be presented to the Policy and Resources Committee and then to the Court of Common Council for adoption.

RESOLVED: To note and considered the points raised (both at the Informal Court meeting in February 2024 and by direct response of the Town Clerk) in relation to the specific questions posed by the Reviewer and Sub-Committee as set out in paragraph 7 of the review and instruct the Town Clerk to bring forward final proposals to the Policy and Resources Committee and Court of Common Council for final adoption.

6. **DECISIONS TAKEN UNDER DELEGATED AUTHORITY**

The Sub-Committee received a report of the Town Clerk and were advised of action taken since the last meeting, by the Town Clerk in consultation with the Chair and Deputy Chair, in accordance with Standing Order No. 41(b).

The Sub-Committee noted the action taken under urgent decision to amend Standing Orders to reflect repeal of Section 618 of the Housing Act 1985.

RECEIVED.

7. **STANDARDS UPDATE**

The Town Clerk reported that there were no outstanding live complaints, and that the single complaint received since the last meeting had been resolved informally.

At the annual meeting of Independent Persons, useful discussions had taken place which included outcomes and learning from recent cases. The Panel via

this Sub-Committee plan to submit a report to the Policy and Resources Committee and then to the Court of Common Council. The Chief Commoner expressed the hope that the pre-complaint protocol would continue to work well and limit the number of Member on Member complaints.

RECEIVED.

8. MEMBER LEARNING AND DEVELOPMENT UPDATE REPORT

A report of the Town Clerk was considered by the Sub-Committee, which sought endorsement for sessions planned for Quarter 1 and provided a forward look at Quarter 2 of the Member Learning and Development rolling programme.

The Sub-Committee were disappointed with the low level of interest and poor attendance at sessions which had led to cancellation or deferment. The Chair discussed the provision of City-specific sessions, which had appeared to have no impact on attendance figures. The Town Clerk had thought creatively to improve attendance, sessions had been offered in various formats, hybrid, face-to-face etc; a variation of timings and days of the week had been trialled. Members suggested sending calendar invitations (as opposed to email alerts which tended to get lost in inboxes). The date would then be saved in Members' Outlook calendars. The Sub-Committee was in agreement that future sessions should be time limited to one hour unless the subject required longer. The competition for Members' time had been a contributing factor in attracting participation, and so this was considered a good idea for making the offerings a more attractive prospect. Recording sessions had not been successful in capturing post session viewers, which had been introduced in recognition of Members' time constraints. A Member suggested enabling Microsoft Word prompts or search tools in recording transcript, to 'bookmark' recordings which would reduce the requirement to view the entire video.

The Town Clerk provided an update on the portal and confirmed that since the last meeting of the Sub-Committee, working with several Members, including the Chair of the Digital Services Committee, useful suggestions had been made to refresh the look, feel and content of the page. A demonstration of this work would be provided to Members at the next meeting of the Sub-Committee.

Members endorsed the information technology focused sessions planned for Quarter 1 and the scoping of Quarter 2 offerings which would deliver City Corporation specific roles within the Court and supporting Members as community leaders.

RESOLVED:- That Members:

Note the report, considered and endorsed the content and direction proposed in respect of future offerings outlined in Quarter 1 (April to June 2024) and the potential offerings for Quarter 2 (July to September 2024).

9. NEW MEMBER INDUCTION PLANS 2025

The Town Clerk reported that in preparation for the delivery of the new Member induction programme 2025, discussions here would frame the content and delivery of a three month series of offerings. The positive feedback had been

taken into account from Members in 2022 and the aim was not to deviated from the existing format but to update and improve the content in 2025. The Town Clerk would seek to attract those returning Members, presenting the programme as an opportunity to refresh knowledge and to share their past experiences with newly elected Common Councillors.

Working with colleagues in Electoral Services, key dates would be made available to all candidates. Successful candidates will then be notified in good time of the dates of various receptions with the Chief Commoner, Policy and Resources Chairman and Town Clerk. Housekeeping, essentials (business cards etc) and equipment would be made available on launch day of the induction/refresher programme.

The current documentation, e-handbook and flyers, will require some update (for example, the new Corporate Plan). Officers are conscious not to overwhelm newly elected Members, therefore information would be phased to allow time for reading and digestion. The considerable amount of information would be kept relevant, and to a minimum. Our existing Members (elected in 2022) will have a significant part to play in the modification and delivery of this Induction Plan, as their experience and comments of their own first three months at the City Corporation, would be a valuable source of information. Some content can be emailed to allow for Members to consider at their leisure, coupled with recordings of sessions. Each Member will have available to them, a hard copy of the ehandbook at their adjourned Wardmote (i.e. when the results are announced).

At 12.10pm, the Chair left the meeting, the Chief Commoner Elect was in the Chair for the remainder of the meeting.

The composition of the Sub-Committee is one that benefits from a varied range of experience and time served on the Court. Members elected in 2022 shared their experiences with the Sub-Committee. It was felt that a Freshers' Fair style "meet the officers" event would provide an opportunity to meet key staff groups with their department, imparting essential information and an explanation of where they sit within the City Corporation landscape, supported by a "cheat sheet" with specific areas of responsibility, giving direction and assistance to Members, this would act as a first post of call for future resolutions to ward related matters. The Governance and Member Services Team were looking to provide one-to-one sessions for Members with accessibility needs, to explore any reasonable adjustments that could be made that would assist the Member with the discharging of their duties.

There was recognition that external members and Co-optees would require an alternative level of support and would not feature in this aspect of the programme.

The management of recognised constraints around timings, resources and budgetary concerns were also highlighted.

RESOLVED: That Members noted the report and;

Agreed that the Member Induction Programme to be renamed the Member Induction/Refresher Programme.

10. **DATES AND TIMES OF FUTURE MEETINGS**

RESOLVED: The Sub-Committee agreed the dates and times of future meetings.

Wednesday 17 July 2024, 11.00am

Thursday 24 October 2024, 11.00am

Thursday 30 January 2025, 11.00am

11. **QUESTIONS ON MATTERS RELATED TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

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

There were no additional, urgent items of business for consideration.

13. **EXCLUSION OF THE PUBLIC**

RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following item on the grounds that it involves the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Item No	Paragraph No(s).
14	1

14. **NON-PUBLIC MINUTES**

The Sub-Committee considered the non-public minutes of their last meeting held on 15 December 2023 and approved them as a correct record.

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

There were no questions in the non-public session.

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

There were no additional, urgent items of business for consideration in the non-public session.

The meeting ended at 12.32 pm

Chairman

Contact Officer: June Haynes, Member Services Officer
june.haynes@cityoflondon.gov.uk

Committee(s) Member Development and Standards Sub-Committee	Date: 17 July 2024
Subject: Members' Code of Conduct	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	6
Does this proposal require extra revenue and/or capital spending?	No
Report of: Comptroller and City Solicitor and Town Clerk and Chief Executive	For Decision
Report author: Edward Wood, Assistant City Solicitor	

Summary

The Civic Affairs 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 draft of a potential Code was then considered at further meetings of the Civic Affairs Sub-Committee in December 2022 and March 2023, and by your Member Development and Standards Sub-Committee in December 2023. Following this iterative process all Members, Co-opted Members and Independent Persons were consulted on the draft document. The consultation responses are now appended in full for your further consideration. This report also summarises the issues raised and provides some additional commentary. Some key issues that require further Member input concern the definition of Antisemitism, the registration of Masonic lodges and the extent to which Members ought to be required to co-operate with any standards investigation or determination. A number of other technical points have also been raised that may or may not require any further amendments to the draft Code. Once your Sub-Committee is content with the text of the draft Code, it is proposed that it will go on to the Policy and Resources Committee in September 2024 for further consideration and the Court of Common Council in October 2024 for formal adoption.

Recommendation(s)

Members are asked:

- To approve the draft Code of Conduct at Appendix 1, with any further amendments, for onward submission to the Policy and Resources Committee and the Court of Common Council; or
- Delegate authority to the Town Clerk, in consultation with the Comptroller and City Solicitor and the Chair and Deputy Chair, to make any further changes prior to onward submission.

Main Report

Background

1. Under section 27 of the Localism Act 2011 the City Corporation is under a statutory duty to promote and maintain high standards of conduct by Members and Co-opted Members. It must in particular adopt a code dealing with the conduct expected of Members and Co-opted Members when they are acting in that capacity. Under section 28 of the Localism Act 2011 the Code of Conduct must be consistent with the Seven Principles of Public Life. It must also include the provision that the City Corporation considers appropriate in respect of the registration and disclosure of interests, in addition to the statutory requirements in relation to disclosable pecuniary interests.
2. The terms of reference of your Sub-Committee include “preparing, keeping under review and monitoring the City of London Corporation’s Member Code of Conduct and making recommendations to the Court of Common Council in respect of the adoption or revision, as appropriate, of such Code of Conduct”. Previously this responsibility sat with the Civic Affairs Sub-Committee. The City Corporation’s current Code of Conduct was adopted by the Court of Common Council on 16 July 2020.
3. The Civic Affairs Sub-Committee reviewed the Corporation’s current Members’ Code of Conduct and the LGA Model Councillor Code of Conduct 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 draft of a potential Code was then considered at further meetings of the Civic Affairs Sub-Committee in December 2022 and March 2023, and by your Sub-Committee in December 2023.
4. Following this iterative process your Sub-Committee agreed to consult more widely on the proposals, by circulating the latest version of the draft Code (Appendix 1) to all Members and Co-opted Members to whom the Code applies, as well as to the Panel of Independent Persons who have to apply the Code. A separate document highlighting all of the modifications made to the LGA Code as tracked changes is included for comparison (Appendix 2). The Corporation’s current Members’ Code of Conduct (Appendix 3) and the LGA Code (Appendix 4) are also attached in full for information.
5. The consultation period ran from 15 January 2024 to 19 February 2024. During this period eight individual responses were received (Appendix 5) – six from elected Members, one from a Co-opted Member, and one from an Independent Person. The responses have been anonymised, but relevant details can be provided on request. The proposals were also discussed at the informal Court of Common Council meeting on 15 February 2024 and notes taken (Appendix 6).
6. A short verbal update on the outcome of the consultation was provided to your Sub-Committee on 8 March 2024 and officers were requested to bring a more detailed report to this meeting. Subsequently a further Member request to amend the Code of Conduct was sent by email to your Chair and Deputy Chair (Appendix 7) and they have asked for this matter to also be considered by your Sub-Committee.

Issues raised during the consultation process

Definition of Antisemitism

7. The issue that was raised most frequently in the consultation responses relates to the inclusion of a specific definition of Antisemitism. This definition, provided by the International Holocaust Remembrance Alliance (IHRA), is in the current Code. Its inclusion was first approved by the Court of Common Council in December 2019. The Court report from the time explains that:

In December 2016 the then-Prime Minister announced the Government's intention to adopt the IHRA definition of anti-Semitism and the then-Secretary of State for Communities and Local Government wrote to Council Leaders encouraging them to adopt the definition. At least 19 London local authorities...and the Mayor of London, have since adopted resolutions on anti-Semitism in line with the IHRA definition. At a meeting of the Leaders' Committee of London Councils on 9 October 2018, its members resolved to commend to London local authorities that had not already done so to, a. Adopt the IHRA definition of anti-Semitism, including the agreed working examples b. Include the IHRA definition and working examples within individual councils' constitutions and codes of conduct for members and officers.

8. Your Sub-Committee looked at this issue prior to the consultation and considered that the definition should be retained. However, several respondents felt that this could be perceived as a greater emphasis on Antisemitism. They either wanted more examples of other types of discrimination to be included in the Code, or else to remove this section entirely and just rely on the general equality provisions. Others at the informal Court meeting felt that it should be retained, given that it had already featured in the existing Code for several years, and that any decision to remove it could be misinterpreted.
9. Both the current Code and the proposed Code prohibit any unlawful discrimination relating to the protected characteristics under the Equality Act 2010, including race and religion or belief, and this would encompass discrimination against a Jewish person whether there was a specific definition of Antisemitism or not. The IHRA definition and working examples simply provide additional detail, nuance and context. Therefore, the draft Code would still serve its intended purpose if the text in question were removed.
10. If Members wished to include additional detail about other types of discrimination (for example, Islamophobia is mentioned a couple of times in the responses) then this would also be an option. However, it is not possible to be prescriptive about every discriminatory act and the City Corporation could still therefore be perceived to be singling out some types of discriminatory behaviour rather than others. As highlighted in the responses there is not necessarily a widely accepted and concise definition of other discriminatory behaviours, so an agreed form of text would need to be arrived at.

(For discussion)

Promoting equality and respect

11. One respondent suggested that the wording at C2.1, "I do not bully any person" and C2.2, "I do not harass any person" should be combined to say, "I promote respect and will not bully/harass any person." However, the current drafting has been given careful

thought by the LGA, and whilst the precise wording of the Corporation's Code is a matter for Members, it is suggested that for the sake of consistency it is best not to depart from the LGA text on this point unless there are strong local reasons to do so. As the respondent acknowledges, C1 already contains a requirement to treat others with respect. It might be an unintended consequence of any change that a Member could be complained about for not actively promoting respect. The respondent mentions the requirement to promote equalities at C2.3, but there is arguably a synergy between that requirement and the Public Sector Equality Duty, as explained at paragraph 23.

12. The same respondent suggested that the wording at C2.3, "I promote equalities and do not discriminate unlawfully against any person" should be broadened to say, "I promote equalities and do not discriminate against any person, including those with protected characteristics." Whilst the sentiment is unimpeachable, the respondent acknowledges that this goes beyond the legislative position and that there might be legal concerns about such an approach. Some forms of discrimination under the Equality Act 2010 are lawful, and some other forms of discrimination that do not relate to protected characteristics might be entirely appropriate.

(For discussion, but no action necessarily required)

Statutory responsibility of the Monitoring Officer

13. It was noted by one respondent that paragraph 14 of the draft Code omits the LGA wording, "Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct..." It is respectfully submitted that the LGA Code is wrong on this point. Whilst the Monitoring Officer is happy to provide advice on any matters that may relate to the Code of Conduct, and paragraph 14 of the draft Code still encourages Members to seek that advice, the responsibility of the Monitoring Officer under the Localism Act 2011 extends only to the register of interests; the previous responsibility for administering the statutory scheme under the Local Government Act 2000 having been removed.
14. The Monitoring Officer does have a responsibility under section 5 of the Local Government and Housing Act 1989 to report to the Court of Common Council where he considers that the Corporation has acted or is about to act unlawfully, and this could include a failure by the Corporation to comply with its statutory duty to promote and maintain high standards of conduct under the Localism Act 2011, but this doesn't constitute a statutory responsibility for the implementation of the Code. It is not therefore recommended that this wording is reinstated.

(No action recommended)

Gifts and hospitality

15. One respondent noted that the draft Code increases the value of gifts and hospitality that must be registered from £50 to £100, when compared with the LGA Code. It is open to Members to revisit this point, if they wish. However, the £100 figure is consistent with the Corporation's current Code. Members have looked at this matter a number of times over recent years (the alternative value of £50 was also mooted by the Committee on Standards in Public Life in 2019) and decided that the higher figure is more appropriate for local circumstances. It is worth noting that the Corporation's current and

proposed arrangements do also require the registration of gifts and hospitality with a cumulative value of £200, when received from a single donor within a rolling twelve-month period. This is in addition to the LGA requirements and would capture gifts and hospitality of any value (even below £50) if they formed part of a larger or more significant pattern.

(For discussion, but no action necessarily required)

Nolan Principles

16. One respondent suggested setting out the Seven Principles of Public Life (the Nolan Principles) in full in the body of the Code. The current drafting is based entirely on the LGA Code, with the individual principles and the explanatory text set out in Appendix A. Again, whilst presentation is a matter for Members, it is suggested that for the sake of consistency it is best not to depart from the LGA layout unless there are good local reasons to do so. We could reinsert the hyperlink to the Guidance on the Nolan Principles from the Committee on Standards in Public Life, although this is effectively mirrored in Appendix A. However, it is noted that Appendix A omits the wording "...and treat others with respect" from the section on Leadership, so this could usefully be added. It might also be sensible to include a reference to Appendix A in paragraph 6.
17. The respondent additionally suggested that paragraph 6 should state in relation to the Nolan Principles that, "Members will be expected to comply with these." However, Members will note that paragraph 6 currently states that councillors, etc. "...should uphold the Seven Principles of Public Life..." 'Uphold' is arguably a stronger or more positive term than 'comply' and is what the LGA settled upon. 'Uphold' is also arguably more appropriate given the very general nature of the Nolan Principles. It should be noted that the more detailed provisions in the Code (which must be complied with) have been developed specifically for the role of Member. The respondent correctly makes the point that there is further guidance available on the Nolan Principles and what they mean, although this can be referred to without being included in full in the Code itself.

(For discussion)

Acting in accordance with the law, etc.

18. One respondent suggested that where the draft Code at C6 requires Members taking decisions on behalf of a charity or company to act in the best interests of that body, and to manage any conflicts, it should also require them to act in accordance with the relevant law. However, we normally take this to be an implicit requirement that does not need to be explicitly stated. Breaking the law generally carries its own sanctions that are more severe than anything that can be imposed as part of the Corporation's standards regime. Where there is a criminal prosecution, this will take precedence over any Code of Conduct investigation, and an illegal act committed when acting as a Member can already be taken into account in any complaint proceedings.
19. The above comments are also applicable to the related suggestion that Members acting as governors of educational establishments should observe the applicable law and guidance. Whilst it would be possible to add a separate entry in relation to governors at C6, those Members acting as governors of external schools, academies, etc. would be covered by the Protocol for Members serving on Outside Bodies, whilst those Members

sitting on one of the Boards of Governors of the Court of Common Council would be covered by the Code in the normal way.

(For discussion, but no action necessarily required)

Guidance on use of Corporation resources and facilities

20. One respondent suggested including guidance on when Members can use the facilities at Guildhall, and Corporation IT equipment, for their own work or personal use. It is respectfully submitted that the Code of Conduct should deal with overarching principles and behaviours and that this sort of detail might sit more naturally in other guidance or policy documents, as the respondent acknowledges. Paragraph 4 of the draft Code already states that it should be read in conjunction with various other documents, including policies on the use of the Corporation's resources.

(For discussion, but no action necessarily required)

Guidance on direct contact with officers

21. One respondent suggested including guidance on when Members can contact officers, especially junior officers, in order to avoid undue pressure and inefficient working arrangements. Again, it is respectfully submitted that the Code of Conduct should deal with overarching principles and behaviours and that this sort of detail might sit more naturally in the Member/Officer Charter, which is to be read in conjunction with the Code. For example, paragraph 6(b) of that document already provides that officers have a right to expect from Members:

vi. not to be subject to bullying or to be placed under undue pressure and, in this respect, Members should have regard to the seniority of Officers in their dealings with them and should not engage junior officers in discussions and requests more properly directed at senior officers.

(For discussion, but no action necessarily required)

Application of the Code to Members' private lives

22. One respondent suggested that paragraph 11 of the draft Code should be expanded to state that a Member always represents the Corporation regardless of whether the setting is public or private. The text currently states that the Code would apply to Members when they are acting, claiming to act, or giving the impression that they are acting in that capacity. It would also apply when Members refer publicly to their role or use knowledge that could only be obtained in that role. This provides more explanation of the position than the Corporation's current Code and is already considered to apply the draft Code as widely as possible, given the legal framework. Section 27(2) of the Localism Act 2011 requires the Corporation to "...adopt a code dealing with the conduct that is expected of members and co-opted members...when they are acting in that capacity." The case of *Livingston v Adjudication Panel for England [2006]* (in relation to the previous standards framework) also reiterated the need to separate the person from the office.

(No action recommended)

Requirement to co-operate with any investigation or determination

23. Two respondents objected to the requirement in C8.2 of the draft Code to co-operate with any Code of Conduct investigation and/or determination. On the one hand it might be viewed as unattractive that a Member could be subject to an initial complaint, and then find themselves subject to a further complaint because they failed to co-operate in the original process. It is less common to seek to compel a particular positive behaviour rather than to prohibit a negative behaviour. It is also not clear what degree of co-operation would be required to satisfy this test, although as with other matters this could be left to the judgement of the Independent Panel.
24. On the other hand, it is hard to see how a Member can comply with the Nolan Principles and the other provisions of the Code without co-operating in such a process. The LGA presumably included this requirement in their Model Code because there is no statutory provision compelling Members to participate in the complaints process or to comply with certain possible outcomes, such as undergoing training or issuing an apology. This can be frustrating for complainants and in some cases could bring the Corporation into disrepute.
25. Either way, it is respectfully submitted that it is not fair to characterise this requirement (as one respondent did) as requiring Members to co-operate with officers, and of standing the relationship between officers and Members on its head. As explained in paragraph 1 above, the City Corporation itself is under a statutory duty to promote and maintain high standards of conduct by Members and Co-opted Members. Although the complaints process is currently supported by officers and the Independent Panel, this is at the request of the Court of Common Council, and in accordance with a Code and procedures ultimately agreed by the Court. Under the current arrangements any individual finding that there has been a breach of the Code must be ratified by the Court before it takes effect.

(For discussion)

Confidentiality and access to information

26. A view was expressed at the informal Court that renewed focus was needed on how confidential and non-public information was to be filtered and handled by Members. Your Sub-Committee will recall that concerns around the leaking of non-public information were raised at both your July and September meetings. As previously advised, both the current Code of Conduct (2(g)-(h)) and the draft Code of Conduct (C4) contain wording relating to confidentiality and access to information. Both sets of provisions are considered to sufficiently address these issues from a drafting perspective. Members may want to look at additional practical steps that could be taken to supplement the Code requirements.

(For discussion, but no action necessarily required)

Alternative version

27. One respondent sought confirmation on the documents being consulted upon, and this point was also raised at the informal Court. To clarify, there is only one version of the

draft Code that has been used in the consultation process. This was circulated by the Town Clerk by email on 15 January 2024, and appears at Appendix 1. Consultees were also directed via a link to the most recent report to your Sub-Committee, which was considered in public session on 15 December 2023.

(No action required)

Registration of individual Masonic lodges

28. This issue was raised with your Chair and Deputy Chair after the formal consultation period but is included for consideration in this report at their request. Freemasonry comes under the heading of non-pecuniary interests, which are not prescribed in the legislation, in contrast with disclosable pecuniary interests. It is therefore a matter of judgement at a local level as to which non-pecuniary interests should be registered. The LGA Code does not include a specific reference to Freemasonry in Appendix B Table 2. It does include membership of “Any Body directed to charitable purposes”, although it is understood that this would only encompass membership of the Freemasons’ Grand Charity, rather than membership of the fraternity itself.
29. The Corporation’s current Code, and the text in the draft Code at Appendix B Table 2, specifically reference membership of any “Fraternal or Sororal Society” as a non-pecuniary interest that must be registered. The Corporation’s current Guidance on the Code of Conduct (which will need to be reviewed once the Code itself is updated) explains that this “would include Freemasonry and the Royal Antediluvian Order of Buffaloes”. The current provisions are couched in this way because, when they were first introduced in 2014, a concern was raised that it would be contrary to judgements of the European Court of Human Rights to require Members to declare their membership of any specific organisation (as opposed to types of organisations in the generality).
30. Article 11 of the European Convention on Human Rights provides a fundamental right to freedom of association which includes joining political parties and societies, etc. This right may only be lawfully interfered with where it is necessary and proportionate to achieve a legitimate aim e.g. the protection of the rights of others, public safety, etc. It should also be noted that Article 11, together with Article 8 (respect for private and family life) are also reflected in the law governing the processing of personal data. Information relating to a Member’s interests can only be processed by the Corporation i.e. collected, stored and published, where it is necessary and proportionate for the discharge of its public functions.
31. It is understood that the current practice regarding registration varies – some Members and Co-opted Members who are Freemasons do list their membership of individual lodges, some do not. It might be disproportionate to require the registration of all individual lodges, as this will not normally be relevant to the work of the Corporation. However, there is a stronger argument for requiring membership of Guildhall Lodge to be specifically registered. It is arguable that this would in any event come under the heading of membership of any “Club or Society active in the City of London”. This could for example be specified in a future iteration of the Guidance – at the moment only Ward Clubs are cited as an example.
32. The submission referenced Lord Lisvane’s comments at paragraph 438 of his Review, about the registration requirements at the time not providing adequate transparency.

For clarification, this related to Members' registers of interests being accessible via their individual webpages, rather than via dedicated pages on the website. It was not a specific reference to Freemasonry, although Lord Lisvane did then refer back to those comments in his section on Freemasonry. He also made brief reference to Guildhall Lodge:

449. I should put beyond any doubt that I make no comment on Freemasonry or its role but, given the views put to me, I think it helpful to comment upon issues of transparency. The recommendations that I make on recorded votes, and on the availability of a full Register of Interests as a single document on the website, will contribute to that transparency.

450. So far as the use of Guildhall facilities (also raised with me) is concerned, I take it that Masonic gatherings are on the same basis, and charged on the same basis, as any other gathering of Members for a purpose not directly connected with Corporation business.

(For discussion)

Mandatory training

33. No issues were raised during the consultation in relation to the new requirement for mandatory training under C8.1, which states that, "I undertake Code of Conduct training provided by the Corporation". However, it may be worth clarifying the relevant timescales again at this juncture, prior to onward submission of the draft Code. When your Sub-Committee considered mandatory training arrangements as a separate item in December 2023 it was agreed that these new arrangements should be timed to commence in the next municipal year, following the 'all out' elections. Therefore, it is not proposed that C8.1 should be implemented during the current municipal year, even if the new Code is approved by the Court within this timeframe.

(No action required)

Next steps

34. Once your Sub-Committee has fully considered the consultation responses and is content with the text of the draft Code the proposals can be reported to the Policy and Resources Committee for further consideration. It is currently anticipated that this will be in September 2024. The draft Code can then be presented to the Court of Common Council for formal adoption. It is currently anticipated that this will be in October 2024.

Conclusion

35. A new draft Code of Conduct, combining the LGA Code with some elements of the Corporation's current Code, has been considered by the Civic Affairs Sub-Committee and by your Sub-Committee on a number of occasions. It has also now been the subject of a wider consultation process and the responses are attached for further consideration and comment. This report summarises the issues raised and provides some additional analysis. Once your Sub-Committee is content with the text of the draft Code it will need to be considered by the Policy and Resources Committee before going on to 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**
- Appendix 3 – Current Corporation Code of Conduct**
- Appendix 4 – LGA Code**
- Appendix 5 – Consultation responses**
- Appendix 6 – Feedback from the informal Court of Common Council**
- Appendix 7 – Subsequent email regarding Freemasonry**

Background papers

- Report to the Civic Affairs Sub-Committee dated 11 October 2022
- Report to the Civic Affairs Sub-Committee dated 6 December 2022
- Report to the Civic Affairs Sub-Committee dated 31 March 2023
- Report to the Member Development and Standards Sub-Committee dated 15 December 2023

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. It should be read in conjunction with any published guidance on the Code and the Corporation’s other relevant policies, protocols, and procedures, including the Member/Officer Charter, the Planning Protocol, the Protocol for Members serving on Outside Bodies, and policies on the use of the Corporation’s resources.

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, intimidating 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.

C6.3 Where taking decisions on behalf of a company I act in the best interests of that company 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.

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 £100 within 28 days of its receipt. I also register multiple gifts and/or instances of hospitality with an estimated combined value of at least £200, when received from a single donor within a rolling twelve month period, within 28 days of reaching the cumulative threshold.

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, and to the Chair of the Policy and Resources Committee, as set out in guidance to be issued from time to time by the Member Development and Standards 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.

Sponsorship	<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>
Contracts	<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>
Land and Property	<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>
Licences	<p>Any licence (alone or jointly with others) to occupy land in the area of the Corporation for a month or longer</p>
Corporate tenancies	<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>
Securities	<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

Any Body of a description set out below of which you are a member or in a position of general control or management:	
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.

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. It should be read in conjunction with any published guidance on the Code and the Corporation’s other relevant policies, protocols, and procedures, including the Member/Officer Charter, the Planning Protocol, the Protocol for Members serving on Outside Bodies, and policies on the use of the Corporation’s resources.

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.

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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.

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 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...”

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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.

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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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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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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.

C6.3 Where taking decisions on behalf of a company I act in the best interests of that company 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**.

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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 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 £100 within 28 days of its receipt. I also register multiple gifts and/or instances of hospitality with an estimated combined value of at least £200, when received from a single donor within a rolling twelve month period, within 28 days of reaching the cumulative threshold.

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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 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, and to the Chair of the Policy and Resources Committee, as set out in guidance to be issued from time to time by the Member Development and Standards 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:). Disclosable Pecuniary Interests means issues relating

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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.]

Sponsorship	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.	<div data-bbox="1114 488 1564 517" style="border: 1px solid red; padding: 2px;">Deleted: council</div> <div data-bbox="1114 517 1564 546" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div> <div data-bbox="1114 568 1564 598" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div>
Contracts	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.	<div data-bbox="1114 725 1564 754" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div> <div data-bbox="1114 777 1564 806" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div> <div data-bbox="1114 940 1564 969" style="border: 1px solid red; padding: 2px;">Deleted: council</div>
Land and Property	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.	<div data-bbox="1114 1077 1564 1106" style="border: 1px solid red; padding: 2px;">Deleted: council</div> <div data-bbox="1114 1158 1564 1187" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div> <div data-bbox="1114 1209 1564 1238" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div>
Licences	Any licence (alone or jointly with others) to occupy land in the area of the <u>Corporation</u> for a month or longer	<div data-bbox="1114 1319 1564 1348" style="border: 1px solid red; padding: 2px;">Deleted: council</div>
Corporate tenancies	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.	<div data-bbox="1114 1368 1564 1397" style="border: 1px solid red; padding: 2px;">Deleted: councillor's</div> <div data-bbox="1114 1426 1564 1456" style="border: 1px solid red; padding: 2px;">Deleted: council</div> <div data-bbox="1114 1456 1564 1485" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div> <div data-bbox="1114 1507 1564 1536" style="border: 1px solid red; padding: 2px;">Deleted: councillor</div>
Securities	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—	<div data-bbox="1114 1666 1564 1695" style="border: 1px solid red; padding: 2px;">Deleted: councillor's</div> <div data-bbox="1114 1718 1564 1747" style="border: 1px solid red; padding: 2px;">Deleted: council</div>

	(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or (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.
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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

Any Body of a description set out below of which you are a member or in a position of general control or management:	
<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>	

Deleted: and to which you are appointed or nominated by the council;...

Deleted: or

Deleted: (including any political party
Deleted: trade union)

Deleted: of which you are a member or in a
Deleted: of general control or management

Appendix C,

Deleted: -

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.

Deleted: Committee on Standards in Public Life

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 procedur... [3]

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

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



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

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

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

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

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

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

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

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

Registering and declaring pecuniary and non-pecuniary interests

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

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

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

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

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

14. Your participation in any item of business:

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

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

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

Definition of Bullying

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

Definition of Harassment

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

IHRA Definition of Antisemitism

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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:

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- 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).
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- 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.

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

STATUTORY INSTRUMENTS

2012 No. 1464

LOCAL GOVERNMENT, ENGLAND

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

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

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

Citation, commencement and interpretation

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

(2) In these regulations—

“the Act” means the Localism Act 2011;

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

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

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

“M” means a member of a relevant authority;

“member” includes a co-opted member;

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

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

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

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

Specified pecuniary interests

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

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

Grant Shapps
Minister of State

6th June 2012

Department for Communities and Local Government

⁽³⁾ 2011 c.20.

⁽⁴⁾ 2000 c. 8.

SCHEDULE

Regulation 2

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

⁽⁵⁾ 1992 c. 52.

EXPLANATORY NOTE

(This note is not part of the Regulations)

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

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

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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 your or your local authority's ability to discharge your/it's 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](#).

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
Sponsorship	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.
Contracts	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>
Land and Property	<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>
Licences	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
Corporate tenancies	<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>
Securities	<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

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;	
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.

From:

To: Stokley, Gemma

Subject: Re: DRAFT CODE OF CONDUCT - CONSULTATION

Date: 15 January 2024 18:28:20

Thanks Gemma, with reference to anti semitic, can we not generalise and provide to include all faiths and religious backgrounds?

From:

To: Stokley, Gemma

Subject: Re: DRAFT CODE OF CONDUCT - CONSULTATION

Date: 16 January 2024 12:41:36

Dear Gemma,

Thank you. I have read the draft code of conduct - and read it alongside the LGA version. It was good to see that it is an almost perfect mirror of the LGA, except in two places:

In para 14. there is no mention that the MO has a statutory responsibility for the implementation of the Code of Conduct - the LGA version makes mention of this. In C.10.2 on the registration of gifts, LGA sets a value of £50, but the corporation sets £100, or £200 for multiple gifts. For good measure I checked some other councils, including GLA, which must closely mirror the Corporation in this area, and they all set £50. While I am not in the least surprised that the Corporation should view itself as exceptional in this area, I would have thought it wiser to apply the same standard as everyone else.

No other comments!

From:

To: Stokley, Gemma

Subject: RE: DRAFT CODE OF CONDUCT - CONSULTATION

Date: 21 January 2024 17:21:34

Thanks, Gemma

A few suggestions:

1. Set out the Nolan principles in full before moving on to our own – e.g. add a statement in 6 “Members will be expected to comply with these”. Add an extra paragraph after 6 with the Nolan headings. Both to ensure that nothing is missed in our own interpretation, and because there is so much guidance on the Nolan principles and what they mean.
2. When saying that members acting as charity trustees or on behalf of companies should act in the best interests of the charity/company, consider adding “and in accordance with charity/company law”
3. Add something similar about those acting as governors of educational establishments as there again is law and guidance which should be observed?
4. On use of resources and facilities I think it would be genuinely helpful for members to know when they can use Guildhall and in particular Guildhall computers for their own work functions; what the rules are around use of computers which members are issued for home use (for example I have BBC Sounds running on my CoLC computer as I type this; I assume that’s OK?); and similarly for CoLC phones. Maybe in separate guidance.
5. As there are so many members would it be appropriate to include guidance on when members can contact officers – especially junior officers – direct, to avoid officers feeling pressured or having too much time taken up?

From:
To: Stokley, Gemma
Cc:
Subject: Draft Code of Conduct
Date: 23 January 2024 09:37:09

Dear Gemma

I am not happy that we single out Antisemitism. Muslims on the Court could well argue that similar attention should be paid to Islamophobia.

I therefore propose that we drop the final sentence of 23 and excise Appendix C, thus removing all specific references to Antisemitism.

An alternative would be to give equal weight to Islamophobia. Unfortunately there is no internationally accepted and concise definition of Islamophobia.

I think the code is sufficiently robust to cover anti-racist behaviour without further spelling it out, especially in light of reference to the Equality Act 2010 in 22. However, if a specific reference to anti-racist behaviour is deemed necessary, then it can be added at the end of 23 in lieu of the sentence that I propose we drop; viz: the Corporation condemns all anti-racist behaviour.

One of the primary objections to retaining and including Appendix C is that the International Holocaust Remembrance Alliance (IHRA) definition of Antisemitism enters into foreign affairs, a field into which we strongly urge members **not** to stray.

I would be most grateful if you could acknowledge receipt of this. Many thanks.

Best Wishes

From:

To: Pinto, Raquel

Cc: Stokley, Gemma; Haynes, June

Subject: RE: DRAFT CODE OF CONDUCT - CONSULTATION

Date: 02 February 2024 13:27:13

Dear Raquel,

Thank you for including me in this consultation.

This all seems perfectly sensible and well set out. However I have two observations:

1) It seems odd to me to only cite Antisemitism in the appendix and not all other forms of prejudice and intolerance – this section seems extremely incomplete to me. I suggest it should include, at the very least, the Government definitions of discrimination:

[Discrimination: your rights: Types of discrimination \('protected characteristics'\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/discrimination-your-rights-types-of-discrimination-protected-characteristics)

2) Section 10-14 - In light of recent experiences I'm also wondering about section 11 and that, in fact, members, whether they like it or not, are subject to scrutiny, in the public eye at all times and in a digitally connected age, can easily be identified. This included in their privately lives. We have had a recent incidence where a member, who had made no reference to their connection with the City, had attracted attention to themselves by their behaviour and a member of the public looked them up and sent a complaint against them to us. So I wonder whether it should expressly say that a member always represents the CoL regardless of whether the setting is public or within their private lives.

Best

From:

To: Stokley, Gemma

Cc: Haynes, June

Subject: Re: REMINDER: DRAFT CODE OF CONDUCT - CONSULTATION

Date: 07 February 2024 13:46:15

Hello Gemma,

I think C8.2 which makes non cooperation a breach of the code is not appropriate and I think that should be removed.

Best wishes,

From:
To: Stokley, Gemma
Subject: Re: DRAFT CODE OF CONDUCT - CONSULTATION
Date: 09 February 2024 15:46:45

Dear Gemma,

Many thanks for forwarding the document for comment.

My views are restricted to C2.

Under C2.3, I quite understand that some groups have protected characteristics and that those are under written by the respective laws. But I think that in our Code of Conduct, we should aspire to "I promote equalities and do not discriminate against any person, including those with Protected Characteristics". That would have the advantage of promoting equality of course because it would not imply that those without protected characteristics have less protection than those that do. I accept that this goes further than current legislation, but it is certainly good practice.

Under C2.1 and C2.2, I wonder if we can be more proactive in promoting what we want as opposed to only saying what we don't want (as indeed we do under C2.3) - e.g. "I promote respect and will not bully/harass any person". This has the advantage of drawing on C1 too, in essence binding the provisions of both articles together.

Lawyers may have views, but I see no harm in tightening up the provision under C2.3 so that everyone benefits, including those with protected characteristics because that terminology does not cut across the provisions in law.

Thanks again for sharing.

Best wishes.

From:
To: Stokley, Gemma; Haynes, June
Cc:
Subject: Draft Code of Conduct
Date: 19 February 2024 17:06:36

Dear Gemma /June

I am a little constrained in my comments on the draft code of conduct as I have been unable to access all the papers. I have used the links to download all the papers but one document that I was able to access when in Guildhall last week is not available to me at home as the link to it produces a paper which contains a part which says non public, restricted etc. This is not very helpful to elected Members.

The wording which concerns me, and I believe other Members, was drawn to my attention by another lawyer. There were, in the document I was able to access in Guildhall (but not at home), an additional four parts of C8, C8-5 to C8-8. One of these referred, as a stand alone item, to Members cooperating with officers. This is standing the relationship between officers and Members on its head. It is officers who are, ultimately, answerable to elected Members, the elected Members are not answerable to officers, whose job it is to carry out (in so far as lawful) the decisions and wishes of the elected Members. The elected Members are answerable to their electors, not officers.

If these additional items appear in the final version produced for approval at Court then I, and I suspect other Members, will have to object to them at the Court meeting. If there is, as I believe to be the case, a different version to that accessible outside Guildhall, then I will have to oppose its adoption at that point. If I am right on this then I suggest the full version is circulated to all Members, in a manner accessible both within and outside Guildhall, and the consultation period extended as otherwise the current consultation will not fully serve its purpose.

Regards

Comments from the informal Court of Common Council meeting on 15 February 2024 were as follows:

- Some felt that Anti-Semitism should not be singled out within this document and its appendices and that it should simply read that all forms of discrimination around protected characteristics were condemned. They warned of the danger of seemingly straying into the realm of foreign policy were it to be retained here in the absence of reference to other forms of discrimination on the basis of religion such as Islamophobia;
- It was noted that the IHRA definition of Anti-Semitism had been widely adopted, this document may therefore benefit from explaining this and the reasoning behind it. But using in the Code of Conduct was queried;
- Others expressed concern around removing the reference to Anti-Semitism given that this had now featured within this document for a number of years;
- It was felt that renewed focus was needed on how confidential and non-public information was to be filtered and handled by Members.
- Members sought confirmation on the version that was being consulted upon, with greater clarity regarding the differences between the two versions.

From:
Sent: Wednesday, June 5, 2024 5:29 AM
To: Dunphy, Peter
Cc: Fentimen, Helen
Subject: Code of Conduct

Dear Peter,

In your role as Chair of the Member Development and Standards sub, I seek your support in updating the Code of Conduct.

The Code is due for review at your next meeting in July.

There has been widespread concern about the opaque nature of the registering of masonic interests.

Lord Lisvane (Para 438) stated that the current arrangements failed to provide adequate transparency.

The current, widely used, test of relevance is whether those interests might reasonably be thought by others to influence actions or words of a member.

There is a clear case that failure to declare individual Lodge membership is no longer acceptable.

This is most apparent in relation to the Guildhall Lodge where seniority and progression between members (and officers) gives rise to a perception of conflict.

Our EDI policy is fatally flawed if we fail to take clear and decisive action.

Best regards,

Committee(s): Member Development and Standards Sub-Committee Policy and Resources Committee Court of Common Council	Date: 17/07/2024 26/09/2024 10/10/2024
Subject: Independent Review of Member Behaviour (Local Government Association) – Proposed Action Plan	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	All
Does this proposal require extra revenue and/or capital spending?	N
If so how much?	N/A
What is the source of funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department	N/A
Report of: Town Clerk	For Decision
Report author(s): Gemma Stokley	

Summary

Good administration and effective decision-making is dependent upon successful Member/Member and indeed Member/Officer working relationships. In this vein, and mindful of the need to encourage constructive and positive behaviours, the Town Clerk (with the support of the then Chief Commoner and the Policy Chair) made an approach to the Local Government Association (LGA), in order to commission an independent review of Member behaviour and inform actions that might be taken to support a commitment to learning and improvement within the organisation, in the context of a strong desire to ensure that the City Corporation is an inclusive and respectful place for people to undertake their work and other duties.

Your Member Development and Standards Sub-Committee (MDSSC) were involved from the outset and were provided with an overview of the intended independent review proposed and, following some suggestions around timescale and scope, approved its progression.

Once complete the Review and the report presenting the draft findings in full was shared with the full Court membership. Your Sub-Committee first considered the recommendations therein, posed their own further questions to add to these, and directed that the views of all Members then be sought informally. A brief covering report drawing out some key questions upon which the Sub-Committee wanted all Members to reflect was submitted to the February Informal Court of Common Council meeting and the meeting itself afforded all the opportunity to discuss the proposals in greater detail, ahead of this being fed back formally to your Sub-Committee.

This report now brings together all comments received on suggested areas for reflection highlighted within the Review Report and also sets out an Action Plan for delivery which your Policy and Resources Committee and, ultimately, the Court of

Common Council, are now asked to approve for adoption. The timing of this report is intended to dovetail with and reflect upon points also raised under the Members Code of Conduct Review given that there are, by definition, clear links between the two pieces of work and an opportunity to capture any relevant learning between these.

Recommendations

Members are asked to note the points raised by Members (both at the Informal Court meeting in February, at your Member Development and Standards Sub-Committee and by direct response to the Town Clerk thereafter) in relation to the specific questions posed by the Reviewer and approve the Action Plan setting out the proposed next steps to help best address these.

Main Report

Background

1. The City of London Corporation has 125 elected Members (100 Common Councilmen and 25 Aldermen). Under the Localism Act 2011, the City Corporation must promote and maintain high standards of conduct by Members and co-opted Members and must adopt a Code of Conduct that is consistent with the Seven Principles of Public Life. The City Corporation has also adopted a Member/Officer Charter that is designed to ensure positive and appropriate working relationships.
2. Notwithstanding the arrangements in place, it has been observed that improvements could be made to the way in which elected Members engage with their peers, as well as with officers and with partner agencies.
3. In an attempt to enhance this area, to promote an inclusive and respectful working environment and support ongoing improvements to Member culture, the LGA was approached to conduct an independent review to assess Member/Member and Member/Officer relationships and behaviours within the City of London Corporation. The LGA responded with a proposal and a timetable for its delivery which was considered and formally endorsed by the Member Development and Standards Sub-Committee.
4. The review took place throughout October 2023. The reviewer's approach was to conduct a number of structured interviews as well as a total of seven focus group meetings to which all elected Members were invited (two in-person and five virtually). Where Members responded to indicate that they would prefer not to raise issues within a group setting, they were encouraged to submit any observations to the reviewer in writing and a number opted to do so.
5. The reviewer also conducted desk research of relevant policies (e.g., the Member Code of Conduct, Member/Officer Charter), the Member Development Programme with attendance stats, webcasts of public meetings, staff survey results, external media articles relating to City of London Corporation culture, communications regarding wellbeing/culture/ staff engagement, grievance/whistle-blowing statistics, and other relevant documentation, to assist in the conclusions reached.

Current Position

6. The review has now concluded. Your Member Development and Standards Sub-Committee had the opportunity to review the findings in the first instance at their December 2023 meeting and, whilst reflecting on the questions posed therein, offered their own thoughts/additional points that they felt would benefit from wider input. Thereafter, the Town Clerk was instructed to share the outcomes with all elected Members, asking that they reflect specifically on the questions set out so as to direct Officers as to any potential next steps that they may feel necessary to help address them.
7. The report was consequently circulated to all Members and time was set aside within the agenda for the February 2024 Informal Court of Common Council meeting to allow for constructive discussion and debate about its findings and suggestions for moving forward. The March 2024 meeting of your Member Development and Standards Sub-Committee provided a final opportunity for Members to draw all views together and to re-visit the questions posed through the Review holistically with these in mind.
8. Alongside this, a consultation concerning a review of the City Corporation's existing Member Code of Conduct document has been underway and Officers were keen to present both pieces at the same time given that, by definition, the two are inter-related and a linked timetable for implementation provides the opportunity to reflect on any relevant learning/commentary across both. A review of the existing Member/Officer Charter is also now proposed for the Autumn which will also respond to various points of the proposed action plan here.

Summary Feedback

9. For ease of reference, the feedback received on each question posed both at the February Informal Court meeting, the March MDSSC meeting and also those made separately to the Town Clerk thereafter are summarised below:-
 - a. **What does "good" look like, could this benefit from the creation of a behavioural framework with worked examples? Who would be best placed to feed into such a document?**
 - *Many were against the introduction of a framework defining 'good' and felt that more of a cultural shift/common sense approach was needed versus further formal documentation;*
 - *The idea of a City Corporation 'Mission Statement' was put forward, clarifying the organisation's underlying values;*
 - *Words in existing policies and procedures should be put into practice by all in terms of working to create a truly inclusive environment and demonstrating good behaviours;*
 - *It was felt that training for all on cultural competency and non-apparent differences would be helpful e.g. – class/social standing, neurodivergence, mental health – important to expand Members' education beyond the visible;*
 - *It was suggested it may be helpful to define 'bad' as opposed to 'good' behaviours to clearly set out those behaviours that were to be discouraged and called out.*

b. How can the existing messaging around expectations and standards of behaviours be reinforced within the induction process?

No substantive comments.

c. Should the introduction of a “buddying” system for new Members be considered – would Ward Deputies (not necessarily your own Ward Deputy) be best placed to offer this?

- *Many were in favour of a buddying system;*
- *Many felt that this did not necessarily have to fall to Ward Deputies and that this role should be considered entirely separate to any sort of buddying system;*
- *It was noted that some Ward Deputies themselves were newly elected Members that would therefore require their own tailored support/mentoring;*
- *Whilst Ward Deputies were often well placed to advise on generalities, it was noted that Committee specific training/mentoring would be of most value to new Members;*
- *It was felt that a skills audit should be undertaken when onboarding new Members to any Committees;*
- *It was felt that any buddying system should not be overly formalised.*
- *All Members intending to return to office post March 2025 should be approached in good time to seek expressions of interest/supporting statements for those willing to act as buddies to any newly elected Members. A certain number of Members would then be selected to form a ‘pool’ of people to whom newer Members may reach out as they navigate the complexities of the organisation.*

d. Should the introduction of mandatory training for Committee Chairs be introduced – how best could compliance with this be encouraged/enforced, through the Code of Conduct/Standing Orders for example?

- *City specific training for Chairs should be offered on a regular basis but not made mandatory, ever mindful of the time demands already placed on Members;*
- *Some queried what the sanction might be for those not undertaking such training were it to be mandated;*
- *It was noted that Chairs were elected annually and that, ultimately, if Members were unhappy with their performance, they could cast their votes accordingly at this juncture;*
- *It was noted that the natural journey of a Chair was to serve as a Member of a certain Committee first, then as Deputy Chair and finally Chair – this was felt to be the ideal ‘training ground’ for the position;*
- *The idea of an annual appraisal or other suitable process by which formal feedback could be received by Chairs from their Committee membership was put forward – this should be a confidential exercise;*

- *The suggestion of a ‘carousel session’ hosted by different Chairs, setting out their approach to managing meetings with an opportunity for Q&As was made;*
- *It was highlighted that further clarity around the roles of various Chairs was required.*

e. How might we identify measures of success around the role of the Chief Commoner in supporting informal resolutions to potential complaints? Does the recent change to the Complaints Process and the introduction of a Pre-Complaint Protocol for all Member-on-Member matters requiring consultation with the Chief/a past Chief still on the Court or the Aldermanic Chairs go far enough?

- *It was felt that poor behaviours reported outside of any formal process was an important means by which the organisation could and should build up a picture of the issues emerging and individuals involved;*
- *It was underlined that cultural changes could not be achieved by simply implementing procedures. Communication and common sense/courtesy was key;*
- *It was noted that there would be certain incidents, those involving discrimination around protected characteristics for example, that would simply require a laid down process;*
- *Some warned against the weaponisation of the formal process;*
- *The introduction of the Pre-Complaint process for Member/Member complaints was welcomed;*
- *A Member queried whether a similar informal process could be championed for Member/Officer complaints;*
- *It was noted that the Chief Commoner could not be held accountable where Members indicated that they were not open to using the Pre-Complaint process.*

f. How do we encourage “allyship” in calling out bad behaviour? How and where best might “allyship” be defined?

- *Many felt that this was about common sense and creating environments where all felt confident in calling out bad behaviours, in Committee meetings for example, where it could often be helpful to pause and re-set the tone of certain debates;*
- *It was important to underline that ‘allyship’ was not about ‘ganging up’ or singling out. Behaviours could be corrected without personalising matters – it was about both behaviours and impacts (albeit sometimes unintended) and emotional intelligence;*
- *It was noted that the Police Authority Board had recently been offered training which may be of relevance/use to the wider Court in this respect;*
- *Speaking out was key - important not to be an active bystander;*

- *Some felt that those on the EDI Sub-Committee could be acting as 'champions' in this respect and had a duty to remind all of behavioural expectations.*

Proposed Next Steps

10. In order to address the views expressed and actions supported by Members under each question posed by the Independent Reviewer, Officers have drawn up a proposed Action Plan (**attached at Appendix 2**). Members are asked to approve its adoption and the next steps set out therein.
11. It is proposed that progress against the Action Plan will be regularly reported upon and monitored by your Member Development and Standards Sub-Committee.
12. The target dates for much of the action plan centre around the new Member Induction in April-May 2025. In terms of measuring success, there is little quantitative data to provide a strict numerical comparison. Initially, we would be relying on anecdotal evidence of improved culture. That being said, it may be possible to support the Chief Commoner in monitoring the number of behavioural matters raised with them informally. These could be used alongside data on the use of the pre-complaints protocol and, of course, the full complaints procedure. Over time, we would be able to report on any increase or decrease in the level of concerns over Member behaviour.

Corporate and Strategic Implications

8. The main objective is to foster an environment of professionalism with an expectation that all Members and Officers will be treated courteously and with dignity. The now completed LGA Review and any next steps in terms of addressing the findings here would demonstrate the drive of the Corporation to ensure high standards of conduct and to embrace best practice. This will, in principle, allow for better delivery against all objectives within the Corporate Plan 2024-29.

Financial Implications

9. Any ongoing financial implications will be dependent upon next steps determined by Members in responding to recommendations coming forward. This may, therefore, require subsequent bids to be made in due course; however, there are no additional funding implications at this stage.

Resource Implications

10. Additional resources may be required to deliver any subsequent learning and development events arising from the points highlighted within the review and directed by Members. Subsequent reports may be required to set these out in greater detail

Legal Implications

11. The legal implications of the proposal are contained within the body of this report. Members are asked to specifically note the City Corporation's duty,

under the Localism Act 2011, to promote and maintain high standards of conduct by Members and co-opted Members.

Risk Implications

12. Member conduct represents a potential reputational risk to the organisation, together with a practical risk associated with a failure to attract and retain high quality Members and Officers should there be a negative working environment. It is, therefore, in the interests of the Corporation to take such steps as are required to foster a positive and inclusive working environment for its Members and Officers.

Equalities Implications

13. Public bodies have a duty under the Equality Act to have due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and people who do not share it; and foster good relations between people who share a protected characteristic and those who do not. The proposals contained in this report do not have any potential negative impact on a particular group of people based on their protected characteristics, rather they seek to actively foster good relations between all.

Climate Implications:

14. There are no climate implications arising from this report.

Security Implications:

15. There are no security implications arising from this report.

Conclusion

16. The independent review of Member behaviour conducted by the LGA has concluded and is part of a wider commitment to learning and improvement within the organisation, in the context of a strong desire to ensure that the City of London Corporation is an inclusive and respectful place for people to undertake their work and other duties.
17. The review clearly highlights that there is much for the Corporation to be proud of but it is obvious too that some challenges still persist. All Members have now had the opportunity to consider these initial findings.
18. It is clear that, for the steps proposed to be taken in response to the Review to be a success and deliver real change, it will be essential to seek to build consensus, with the primary objective being that the organisation is able to articulate and demonstrate the standards of behaviour that are expected of its elected Members clearly and consistently. It is in this vein that we therefore now ask that your Committee approve the proposed Action Plan to address the points highlighted and agreed by Members as requiring further improvement.

Appendices

- Appendix 1 – LGA Final Report - An independent review into Member behaviour within the City of London Corporation
- Appendix 2 - Independent Review of Member Behaviour (Local Government Association) – Proposed Action Plan

Gemma Stokley

Principal Governance and Member Services Manager



An independent review into Member behaviour within the City of London Corporation

November 2023

Introduction

The LGA was pleased to be invited into the City of London Corporation to undertake a review to assess Member/Member and Member/officer relationships and behaviours within the organisation. The review was not an inspection but rather part of a commitment to learning and improvement within the organisation in the context of its strong desire to ensure that the City of London Corporation is an inclusive and respectful place for people to undertake their work and other duties.

The review was independent of the Corporation to provide an objective assessment of the current situation and sought to identify things that are positive as well as provide suggestions of things that the Corporation might want to do to address any identified issues. I appreciated the honesty, professionalism and enthusiasm with which people engaged in the process and the support provided in the lead up to and

during the review.

The review was undertaken by Sarah Messenger, Local Government Association Consultant (Workforce) and previously Head of Workforce for the LGA.

Methodology

The review was largely conducted through conversations either in one to one interviews or focus groups held over several days in October 2023. Most of these were conducted remotely via Teams but I also visited Guildhall to conduct two focus groups in person. I spoke to senior managers, the Chief Commoner and twenty one other Members which enabled me to consider a range of views and perspectives.

In addition, Members were given an opportunity to email me confidentially to share their thoughts, experiences and suggestions relevant to the review and a small number chose to do that. I also conducted desk research of relevant policies and procedures including the Member Code of Conduct, the Member/Officer Charter and Member induction including the range of training offered to all Members.

The emphasis in my meetings was on having a structured, confidential and relaxed conversation where interviewees/focus group members could reflect and share their honest views about the issues under consideration as well as make suggestions for the way things might be done differently moving forward.

A review such as this can only reflect the views of those spoken to, but the findings are based on patterns that recurred throughout my conversations. They capture the points I heard repeatedly, giving confidence that they are a fair reflection of the feedback I heard. However, I am conscious that I only spoke to around 20% of Members so care needs to be taken in drawing any firm conclusions. It was unfortunate that some of the focus groups had a very small number of attendees, and some were cancelled because no-one had indicated they were able or would like to attend. Of course, Members are busy people and several have day jobs beyond their Corporation responsibilities so this is not intended as a criticism but I want to acknowledge that no firm assumptions can be made about a majority Member view when I spoke to only a small proportion of the elected representatives. However, I had rich conversations with those people I was fortunate to talk to and they provided me with sufficient perspective, insight, experience and suggestions to validate the conclusions I have drawn.

I am aware that there have been some formal complaints about Member behaviour over recent years. This review was not intended to re-examine these in detail although they have been helpful as examples of the behaviours I was asked to consider.

Context

The City of London Corporation has 125 elected members (100 Common Councillors and 25 Aldermen). The electorate is made up of a small number of residents and

workers of local businesses and, uniquely, for a local government organisation in the UK it is non-party political and therefore does not have the systems of whip and party discipline that are present in all other Local Authorities. The Corporation is a historic, traditional and hugely important institution not just within London but the UK economy as a whole. It is unlike any other public body in the UK with a sphere of activity and influence that transcends its geographical borders. Several Members have held very senior roles in a variety of professions including financial services and the law and have high levels of expertise in the matters they are responsible for. This context is important in understanding why things are done as they are in the Corporation and why the culture, and behaviours that underpin it, have evolved as they have.

As part of the review, I looked at the Member Code of Conduct, the Member/Officer Charter, induction for new Members and the role of the Chief Commoner in resolving differences between Members. All of these were considered through the lens of the Nolan Principles which make clear the standards expected of all of us who undertake public roles. The Member Code of Conduct and Member/Officer Charter are both clear, well-written documents that are consistent with what you would expect to find in any good Local Authority. The challenge is to ensure that they become more than simply words on a piece of paper and set standards and a tone that everyone understands and buys into. My sense from the conversations I had is that these documents are known about and are shared through the induction process but that there is insufficient discussion about what they mean in practice. Consequently, I feel there is more the Corporation could do to be explicit about what good looks like in terms of how Members interact with each other and with officers. I will return to this later in the report.

The Chief Commoner is a role elected by all Members once a year and is often held by a longer serving, respected Member of the Court. The incumbent has an important outward facing role, supporting the Lord Mayor and two Sheriffs but also has an inward facing role described to me as a mixture of Leader of the House, Chief Whip and Shop Steward. This seemed to me to be a good way of trying to capture the importance of the Chief Commoner role in encouraging positive relationships and behaviours, intervening appropriately when issues arise and seeking to resolve differences. How this is done and how well it is done is largely decided by the skills and appetite of the incumbent and there is an opportunity to continue to review the role of the Chief Commoner to clarify responsibilities in terms of behaviours and relationship management so there is an expectation on the role holder to drive excellent organisational standards and help to minimise recourse to formal routes for dealing with disagreements and complaints. The Corporation has already taken steps in this direction which is welcome.

What are the positives?

The main positives I heard are described below:

- Almost all the Members I spoke to describe the Corporation as friendly, welcoming and polite. Some Members said they had never experienced poor behaviour from other Members and even those that had, emphasised that generally people are helpful, respectful, and courteous in their dealings with each other. The Corporation has had a significant intake of new Members since 2017 and some of the newer Members that I spoke to were keen to highlight how friendly people had been since they were elected. Linked to this

is a feeling that some shared with me that the Court is now a more open and vibrant place both personally and professionally. There have been a number of changes to formal and informal governance arrangements over recent years and I was told this has enabled greater levels of engagement and a reduced ability of specific groups to unduly influence and control the work of the Corporation. My focus was not particularly on the intricacies of the Corporation's governance arrangements but it's important to acknowledge that a number of longer standing Members feel that things have improved.

- It was acknowledged that there had been significant improvements to the induction process over recent years. This includes the range of training available to Members alongside the structured induction sessions provided for all new Members. Some of the older traditions such as new Members not speaking at Court for their first year have fallen by the wayside and through the induction process and support from longer standing Members, most new Members I spoke to felt able to contribute immediately. Some felt that most of their support had come from other Members within their wards rather than the formal induction process but whatever the route, the general sense was of an organisation better able to welcome and integrate new people.
- One of the effects of the intake of new Members is the increased diversity within the organisation, particularly in terms of gender, age and ethnicity. This is a welcome development in terms of the benefits of diversity of thought, perspective and experience that difference brings. Nobody talked to me about serious issues with racism, sexism, bullying or harassment which was reassuring. However, I did hear of some comments made during exchanges

between Members that suggest outdated and potentially discriminatory attitudes especially with regards to gender, may linger amongst a few.

- It was clear from the people I spoke to that senior officers are held in high regard and recognised as assets for the organisation. Somebody described the Town Clerk/Chief Executive as ‘a remarkable human being’ and others talked of the respect they had for the knowledge, skills and experience that senior officers had. Others were equally complimentary about the wider workforce although I did hear of issues with the way some officers have been treated by Members that I will return to later.

What are the areas of concern?

A review such as this is usually most valuable for the insight and feedback provided on things that are concerning or that people would like to change. Whilst I heard of positive experiences from most of the people I spoke to, this was not universal and concerns or suggestions for improvements were articulated by those spoken to.

These are captured below:

- Whilst no-one suggested that there is a systemic problem with poor behaviour within the organisation, several people I spoke to said that there is a minority of Members who behave badly or unacceptably sometimes. The examples of poor behaviour included disparaging remarks, personal attacks, raised voices, eye rolling, whispering behind hands when others are speaking. In isolation, these examples can seem petty and puerile but cumulatively they are pervasive and can create an environment where both Members and officers

are concerned about speaking and feel uncomfortable. It strikes me that in a context where, as one interviewee put it, 'most Members are achingly nice' these instances of poor behaviour become magnified. There were mixed views about whether behaviour generally had worsened or improved over recent times but it is clear from my conversations that a problem persists with the behaviour of some Members. Most examples I heard related to Member to Member behaviour but some did tell me of times when Members behaved badly towards officers.

The impact of this is to stifle debate, inhibit robust and transparent decision making and to undermine the ability of all to contribute to the best of their ability. Some told me of the reluctance to speak in meetings and felt that the issues with poor behaviour were impacting negatively on the effectiveness of some meetings and the ability of the Corporation to carry out its business.

- The situation with poor behaviour is exacerbated by the unwillingness of some Members to challenge those who are behaving badly or unacceptably. Whilst some instances have been challenged, most Members acknowledged that individually and collectively they did not always challenge poor behaviour and when someone is brave enough to speak up, others don't always back them. This links to the point above about the fear of the repercussions of speaking out. A few felt that the Chairs of Committees have the primary responsibility to hold Members to account when they behave badly in meetings and this does not always happen. I am aware of activity on social media and on blogs and websites that is highly critical of the Corporation and some of the people that operate within it which can also be an inhibitor to 'putting your head above the parapet'.

- A number of interviewees highlighted the absence of a clearly defined, understood and collectively owned organisational culture. There is an absence of debate about what the culture is or should be and one person suggested the organisation lacked 'cultural competency'. Any successful organisation will have clear responsibilities, ambitions and achievements supported by a shared understanding of what 'good' looks like. This extends beyond just what the organisation does to how it does it. Some felt that there is a sense of 'them and us' either between Members or between some Members and officers which undermines the principle of shared, collaborative ownership of the institution, its responsibilities and relationships. In the absence of a defined and collectively owned organisational culture, people make their own decisions about what is and isn't acceptable re behaviour etc which leads to inconsistency and confusion. One person told me that it feels as if some Members do 'exactly as they please' and others suggested some Members behave as if the rules don't apply to them. I want to reemphasise that everyone I spoke to was clear that we are only talking about a small minority of Members when it comes to poor behaviour but enough for the impact of what they do to pervade the whole organisation.

The agreed organisational culture and standards of behaviour should extend to all activity undertaken on behalf of the Corporation including evening events such as banquets etc.

- A few people told me they felt the Members Code of Conduct had become 'weaponised' by some meaning that matters that could and should have been resolved informally end up in formal procedures. I did not explore this in more

detail in terms of specifics but I was struck by the eagerness to raise matters formally in some cases rather than seeking to talk through the problem and for apologies to be given where necessary.

- The issue of training for Members came up in several conversations. I am aware that there is a wide programme of training available to members and several people acknowledged this. However, it is not mandatory and take up can be patchy. Whilst it's not necessary for all training to be mandatory, if the organisation is serious about creating a shared organisational culture and standards of behaviour for all then it has a responsibility to ensure everyone understands what the organisation expects of them and what they can expect of the organisation. Training and induction are the best way of achieving this. One Member described joining a committee and not being greeted or welcomed by the Chair. This may have been an isolated incident but it's an example of the sort of behaviour that can create a sense that you don't belong or you don't matter. Most of the examples of poor behaviour I heard are happening in Committee meetings or in meetings of the Court and several people felt that the Chair of those meetings could and should have taken action to challenge the behaviour. This did not always happen and suggests a lack of clarity and/or accountability about the role and responsibilities of the Chair in such circumstances.
- There is a sense amongst some that the organisation should consider new ways of ensuring Members get to know each other better and have opportunities to engage with each other beyond formal meetings. The fact that more Members now have jobs alongside their Corporation responsibilities mean that not all are able to attend the lunches that accompany formal meetings or to join visits to different sites. Some longer standing Members felt

these opportunities to interact informally with each other had been a valuable ingredient in relationship building and that the organisation would benefit from implementing new initiatives to spend time together, taking into account the work lives and other responsibilities of Members.

- My conversations elicited a mixed picture regarding relationships between Members and officers. The vast majority of Members were very positive and complimentary about officers although some did acknowledge that they had occasionally seen officers treated badly by Members. For example, some felt that a small number of Members treated more junior officers as if they were 'servants' and they were aware that staff were afraid to raise their concerns for fear of the repercussions. On the other hand, a couple of Members felt that officers, particularly more senior ones, focused too much on meeting the needs of senior Members and could do more to build relationships across all Members.

Officers felt that most Members treated them well and were friendly, respectful and professional in their dealings with them. However, some have felt they have been treated badly by some Members creating at best an unpleasant environment to work in and at worst, a belief they have been bullied. The 'them and us' perceptions that I referred to earlier also extends to Member/officer relationships. I am aware that the 2021 Governance Review said that 'the Corporation has no sense of common endeavour' and some officers would like a stronger sense of the Corporation belonging to and being the responsibility of both Members and officers. The organisation is fortunate to have access to significant levels of officer and Member knowledge, skills and experience; the challenge is how to harness that in a shared endeavour to make the best decisions in the interests of residents, businesses and the

UK economy.

- Earlier, I described improvements in governance and ways of working that some feel have contributed to a much improved working environment both professionally and personally. However, some issues persist and these emerged in my conversations with Members. One theme raised by a number of Members was the number of individuals belonging to the Masonic lodge. Numbers had declined in recent years but appear to be on the rise again and some expressed concerns about the lack of transparency about which Members participate in the lodge, the proportion of lodge members who sit on key committees and the fact that women Members and members of staff are not represented within the lodge. I did not explore this further nor am I suggesting that membership of the lodge is, in itself, a problem but its existence and influence within the Corporation is a cause for concern for some Members and is therefore something that needs further discussion. The other issue that was raised more than once with me is the tendency for some questions/issues to be raised for the first time within Court rather than being properly addressed first through the Committee system. Some of this is seen as 'grandstanding' by those Members who do it and it can undermine the effective decision-making processes of both the Committees and the Court. Again, this needs to be explored further to draw any firm conclusions but certainly warrants debate within the Corporation.

Moving forward

I have acknowledged already that the majority of Members did not contribute to this review so care needs to be taken with drawing any firm conclusions at this stage.

However, there were patterns in what I heard from those who did contribute and they have been captured in the sections above. Perhaps the most useful contribution this report can make is to stimulate discussion and debate between Members and Members/officers about the feedback I have shared and options for addressing the concerns I have described. With that in mind, I offer the following suggestions of things the Corporation may wish to consider doing as part of an organisational responsibility to maintain and build on its many strengths but also to learn and improve moving forward.

1. The paper should be shared with all Members and senior officers with time set aside for constructive discussion and debate about its findings and suggestions for moving forward. It would be helpful for some of this discussion to take place with Members and officers together. The challenge is to agree what tone you want the organisation to set and how you want everyone to feel when they are undertaking their roles and responsibilities on behalf of the Corporation. I use the word 'feel' to represent the environment that the Corporation creates; do people feel respected, valued, integrated, inspired etc and therefore able to give their best?
2. I would strongly encourage the Corporation to consider what 'good' looks like in terms of behaviours, relationships and ways of working. In effect, I am suggesting the Code of Conduct and Member/Officer Charter are brought to life with examples of what they mean in practice. Some will feel this is patently obvious and therefore an exercise that has no value but I take a different view. In any organisation, the absence of a shared understanding of and commitment to a defined organisational culture and standards of behaviour

leaves individuals to make their own decisions about what is and isn't acceptable. Members and officers alike have a shared responsibility for both the effective working of the organisation and its reputation. To do that properly, there needs to be agreement about what that looks like in practice.

3. The Corporation should consider how it can reinforce its messaging about standards of behaviour and organisational culture in the induction process. This is the first and most important opportunity to inform Members about the environment they are entering, how they will be supported and respected in carrying out their role and responsibilities and what is expected of them in carrying out their democratic role. It should go beyond simply sharing relevant documentation and include clear messaging and discussion about what being a Member within the City of London Corporation means in terms of how you behave and conduct yourself.
4. It may be helpful to introduce a system of 'buddying' for new Members so that everyone has one on one access to someone who can help them settle in, answer questions and support them in navigating the complexities of the organisation. I am aware that this often happens informally and some people described the great support they'd had from other Members within their ward, but making such support available to all may be helpful.
5. I think the Corporation would benefit hugely from requiring all Chairs of Committees to undertake mandatory training in the roles and responsibilities of being a Chair. This would include all the elements of successful chairing of meetings and would include the responsibility to ensure that the business of

the Committee is conducted respectfully and professionally, with poor behaviour challenged and stopped. There should be mandatory refresher training for all Chairs every two years.

6. Steps have been taken in recent times to reinforce the role of the Chief Commoner in managing Member behaviour and relationships and this is welcome. It is early days but some people told me it was a good step in the right direction and will help in managing and reducing some of the issues that have arisen previously. It would be helpful for the Corporation to be clear about the measures of success for this revised role so that it can be confident that it is making the difference that was intended. For example, one would hope that there would be a reduction in formal complaints. Of course, the success of the Chief Commoner role will always rely to some extent on the skills, influence and reputation of the incumbent but monitoring of impact will provide organisational oversight of how well the role is being carried out.

7. It would be helpful to encourage a culture of 'allyship' when it comes to challenging instances of poor or unacceptable behaviour from some Members. This will be easier to do in a context where there has already been discussion and agreement about what 'good' looks like regarding organisational culture and behaviours. Allyship does not mean 'ganging up' on people but rather is a way of all Members demonstrating they understand their responsibility to challenge unacceptable behaviour and minimises the potential for such challenge to be left to a 'brave' few. Poor behaviour should always be judged by the effect on the recipient rather than the motivations or intentions of the person behaving badly. People will have different tolerance

levels for behaviour they may be on the receiving end of but all Members should feel a responsibility to step in when someone is clearly unhappy or upset by someone's behaviour or when they witness behaviour that they consider to be inappropriate or unacceptable.

Conclusion

I enjoyed meeting Members and officers within the Corporation and was impressed by the insightful contributions I heard or received via email. It is clear the organisation has undergone significant change over recent times which has largely been perceived to have brought benefits and improvements to the organisation. There is much for the Corporation to be proud of but challenges persist that this report has sought to highlight. I hope that the report is a stimulus to honest, respectful and collaborative debate that allows the Corporation to decide for itself what it would like to change and to agree on the reasons for doing so.

Appendix 2**Independent Review of Member Behaviour (Local Government Association) – Proposed Action Plan**

<u>Suggested Areas of Improvement/Reflection</u>	<u>Actions Proposed to Support</u>	<u>Proposed Delivery</u>	<u>Owner</u>	<u>Goal Date</u>
1) Defining what good looks like	a) Development of a clear 'Mission Statement' or set of statements for the organisation in terms of Member Behaviour with worked examples of acceptable and unacceptable behaviour	With the recent launch of a new Corporate Plan and People Strategy, your Member Development and Standards Sub-Committee will be asked to consider the development of a mission statement with regard to Member Behaviour that is well-aligned with the ambitions set out here and is one which can be adopted and actively promoted by all elected Members.	<u>Assistant Town Clerk</u>	<u>To be prepared by April 2025, for the new Court.</u>
	b) Review of Code of Conduct in line with the Model Code of Conduct – to include/append more worked examples of acceptable/unacceptable behaviours	A review of existing City Corporation COC is already underway following publication of the Local Government Association (LGA) Model Councillor Code of Conduct. Your Civic Affairs Sub-Committee (CASC) and subsequently your MDSSC have 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.	<u>Comptroller and City Solicitor / Assistant Town Clerk</u>	<u>To be delivered by October 2024.</u>

		<p>One proposed amendment to the Code, if adopted, will have the effect of making all Code of Conduct training mandatory as of March 2025. Frequent training and refresher sessions on the Code will therefore be factored into both the Induction and ongoing Member Learning and Development Programme. Given comments also raised as part of the consultation on this Member Behaviour Review, future Code of Conduct training will also have a specific focus on EEDI.</p> <p><u>Revised Code to be presented to the Policy and Resources Committee and subsequently the Court of Common Council for formal adoption in Autumn 2024.</u></p>		
	c) Review of Member/Officer Charter – to include/append worked examples of acceptable/unacceptable behaviours	Review of Member/Officer Charter proposed to dovetail with the forthcoming review of the Members' CoC.	<u>Executive Director of HR & Chief People Officer/Comptroller and City Solicitor</u>	<u>Await response to the Staff Survey and take forward once Code of Conduct review has been delivered.</u>
	d) Member Training and Development on the Code of Conduct	As detailed above, training on the Code of Conduct to feature prominently in all future Member Induction Plans and to also be scheduled regularly within the wider Member Learning and Development	<u>Comptroller and City Solicitor / Assistant Town Clerk</u>	<u>A minimum of four sessions a year to be scheduled from April 2025. Training should</u>

		<p>Programme thereafter given that the effect of adopting the proposed new Code of Conduct will be that such training will be mandatory for all elected Members with effect from March 2025.</p> <p>This will also include a specific focus on EEDI.</p>		<p><u>also be provided to 'External' Members who are held to account against the same Code.</u></p>
	<p>e) Member Training and Development on protected characteristics but also on 'cultural competency' and non-apparent diversity</p>	<p>E-learning modules (available to all elected Members) are already available but there will be a renewed focus on and active promotion of these via the Members Portal pages. The Chief Commoner's newsletter could also helpfully flag these offerings on a regular basis.</p> <p>Governance and Member Services Team to investigate additional relevant training opportunities/providers both in-house and externally and ensure that such training is made widely and regularly available to all via the Members' Learning and Development Programme overseen by your MDSSC.</p> <p>EEDI Training will form a key part of future Code of Conduct training and will also be an integral part of any Induction programme.</p>	<p><u>Assistant Town Clerk</u></p>	<p><u>Aim to have a 100% completion of relevant e-learning modules by the new 2025 Membership by September 2025.</u></p> <p><u>A report to come forward in due course setting out options and costs of such opportunities.</u></p> <p><u>To be implemented by April 2025.</u></p>

<p>2) Introduction of a buddying system for new Members</p>	<p>a) All Members to be approached and asked if they wish to form part of a 'pool' which new Members may reach out to if wishing to seek a buddy. Each Member volunteering to be asked to submit a short supporting statement as to their suitability for the role.</p>	<p>Members emphasised their desire not to over formalise these arrangements and it was noted that this often already happened organically.</p> <p>As part of the revised Member Induction programme already approved by your Member Development and Standards Sub-Committee, the Governance and Member Services Team will contact all Members seeking to return to office in March 2025 and seek expressions of interest/supporting statements for those willing to act as buddies. Such expressions of interest will then be considered by your MDSSC. Those Members selected to form the 'pool' of buddies will have their contact details made available to all newly elected Members as of March 2025 with helpful briefing notes provided to all to set out the broad expectations of the role.</p>	<p><u>Assistant Town Clerk</u></p>	<p><u>To be actioned as part of the 2025 Member Induction offer.</u></p>
	<p>b) Improvement and standardisation of Committee on-boarding process</p>	<p>Governance and Member Services Officers to seek to standardise the onboarding process for new Committee members in so far as possible and to discuss/re-iterate expectations around new Member, Committee-specific, induction with relevant Chairs/Chief Officers ahead of the March 2025 all-out elections</p>	<p><u>Assistant Town Clerk</u></p>	<p><u>To be actioned as part of the 2025 Member Induction offer.</u></p>

	c) Additional support for new Ward Deputies and revised Ward Deputy Role Descriptions	<p>Governance and Member Services Team to revise the existing Ward Deputy Job Description and ensure that this is readily available to all via the Members Portal and that it also features within any future Induction Pack/suite of wider reading material.</p> <p>Existing training offered to Ward Deputies, clearly setting out expectations around the role in an attempt to ensure a degree of consistency across the board, to be offered more frequently and to be more pro-actively promoted as part of future Learning and Development programmes.</p>	<u>Assistant Town Clerk</u>	<u>A report to come forward in time for implementation in April 2025.</u>
3) Training for Committee Chairs	a) City specific training for Chairs to be offered on a regular basis	This has already formed a part of the Member Learning and Development Programme. This will continue to be regularly delivered in-house as part of the wider programme.	<u>Assistant Town Clerk</u>	<u>To be provided from April 2025.</u>
	b) Introduction of anonymised annual appraisals or other suitable process by which formal, confidential feedback could be received by Chairs from their Committee membership	Governance and Member Services Team to draft a proposed set of questions to be considered and approved by your MDSSC. Once approved, questions to be issued by relevant Committee Clerks at an agreed point each civic year. Chair to receive anonymised feedback annually.	<u>Assistant Town Clerk</u>	<u>A report to come forward in time for implementation for the 2025/26 civic year.</u>

	c) 'Carousel sessions' held by Committee Chairs with opportunities for Q&A from other Members	To be factored into future Member Learning and Development Programmes with Chairs approached and offered session slots on rotation. Format of such sessions to be agreed with your MDSSC.	<u>Assistant Town Clerk</u>	To be provided following the <u>new Member Induction (i.e. from September 2025)</u> .
	d) Review of Chair Role Descriptions	Governance and Member Services Team to review and update existing Role Descriptions for Chairs in consultation with relevant Chief Officers and to make these readily available on the public webpages/Members Portal thereafter	<u>Assistant Town Clerk</u>	A report to come forward in time for <u>implementation in April 2025</u> .
4) Role of the Chief Commoner in supporting informal resolutions to potential complaints and in Member behaviour/relationships more generally	a) Review of Role Description of Chief Commoner to ensure that it aligns with and reinforces the new responsibilities articulated within the Code of Conduct Complaints Procedure regarding Informal resolution of Member/Member Complaints and ensure all other relevant updates	Governance and Member Services Team to review and update existing Chief Commoner Role Description ensuring alignment with all other relevant Corporate Governance documents such as the Complaints Procedure for Complaints under the Member Code of Conduct.	<u>Assistant Town Clerk</u>	A report to come forward in time for <u>implementation in April 2025</u> .
	b) Exploration of similar Informal Resolution mechanisms for Officer/Member complaints	Provision of this to be explored within the forthcoming Member/Officer Charter Review.	<u>Comptroller and City Solicitor / Assistant Town Clerk</u>	Take forward once Code of Conduct review has been <u>delivered</u> .

5) Encouraging “Allyship”	a) Increased and Improved Member Training in this respect	<p>Governance and Member Services Team to investigate relevant training opportunities both in-house and externally and ensure that such training is made widely and regularly available to all via the Members’ Learning and Development Programme overseen by your MDSSC.</p> <p>Liaison with City of London Police colleagues who have recently offered such training with positive feedback.</p>	<u>Assistant Town Clerk</u>	To be provided following the <u>new Member Induction (i.e. from September 2025).</u>
	b) Renewed focus on Chairs in calling out poor behaviours in a Committee setting	<p>The additional responsibilities and expectations of Chairs in this respect to be drawn out within future Code of Conduct training, within the revision of Chair Role Descriptions and also within any forthcoming review of Standing Orders pertaining to conduct at meetings.</p> <p>The ability and willingness of Chairs to call out such behaviours may well be something that Members are asked to reflect upon specifically in the proposed annual appraisals.</p>	<u>Comptroller and City Solicitor/Assistant Town Clerk</u>	<p><u>Review of the SOs is to be delivered before April 2025.</u></p> <p><u>Work on Chairs job descriptions to be prepared for April 2025.</u></p> <p><u>Appraisal process to be introduced for 2025/26</u></p>
	c) EDI Sub-Committee members as ‘champions’ of allyship	The EDI Sub-Committee to consider this suggestion further and ways in which they might best take on and promote themselves in this way.	<u>Assistant Town Clerk</u>	Report to go to <u>EDI Sub-Committee ahead of the 2025 Elections.</u>

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Agenda Item 6

Committee(s): Member Development and Standards Sub-Committee Policy and Resources Committee Court of Common Council	Date: 17/07/2024 26/09/2024 10/10/2024
Subject: Panel of Independent Persons - Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	All
Does this proposal require extra revenue and/or capital spending?	N
If so how much?	N/A
What is the source of funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department	N/A
Report of: Town Clerk	For Information
Report author(s): Gemma Stokley	

Summary

This report presents activity undertaken by the Panel of Independent Persons in relation to both Complaints received under the Members' Code of Conduct and applications for dispensation since their inception. Their submission has been placed by the Town Clerk's office into the usual report format, in order to facilitate submission to the Member Development and Standards and Policy and Resources Committee ahead of its submission to the Court of Common Council where it will need to go as a report of the Policy and Resources Committee given that neither the Panel nor the Sub-Committee have any direct reporting mechanism.

It is envisaged that a similar annual report will be submitted to the Court of Common Council each Autumn now that the Panel of Independent Persons are at full complement with 12 Independent Persons in place.

Recommendation

Members are asked to note the contents of the report.

Background

1. The Panel of Independent Persons (The Panel) was initially established by the City of London Corporation (the Corporation) by way of Court of Common Council Resolution on 14 January 2021.
2. This was following an independent Governance Review of the City Corporation undertaken by Robert Rogers, the Lord Lisvane. Part of the recommendations of the Report proposed the establishment of an Independent Panel composed only of independent persons, to receive allegations of misconduct under the Code of Conduct, determine whether to investigate, present findings to the Court, and hear any appeal.
3. Following an initial round of recruitment, the Panel was established in July 2021 and its purpose and powers were set out. The task was unique in that the Panel were called upon to firstly establish and to thereafter administer a suitable Complaints Procedure for complaints received under the Code of Conduct and to also consider applications for Dispensations. The Panel (convening as smaller sub-Panels of three) receives allegations of misconduct, determines whether to investigate and/or proceed to Hearing, presents its findings to the Court and hears any appeals. The Panel also has responsibility for making recommendations as to whether or not dispensations should be granted or refused.
4. When first established the Panel was comprised of nine members. This was later reviewed to ensure that adequate panel members were available to cover all necessary stages of a complaint noting that no one Independent Person may sit on more than one stage of the same complaint, but also to take into account availability and any potential conflicts of interest. It was approved by the Court that a further three members should be appointed bringing the panel to a total of twelve. The final three Panel members joined in October 2023. Details of all current members of the Panel, can be found at Appendix 1. This, therefore, is the first opportunity as a full Panel to present an 'Annual Report' although, for completeness, the opportunity has been taken to summarise all work undertaken with regards to alleged breaches of the Code of Conduct since March 2022 when the first complaint to the newly constituted Panel came forward. It is intended to report to the Court of Common Council in Summer each year going forward.
5. The Panel's current terms of reference are attached at Appendix 2 of this report. The Terms of Reference for the Panel were developed by the Panel. A draft was considered by the Panel and, following a number of suggested amendments, these were referred initially to the Civic Affairs Sub-Committee. The Terms of Reference were subsequently received by the Court in October 2022.

6. This report is being used by the Panel as the means of communicating its activity and the activity of all Assessment, Hearing, Appeal and Dispensations Sub-panels called to sit during the period from March 2022 to May 2024.

Operation of the Panel

7. The Panel operates within the framework of its terms of reference and all Panel members agree to follow the Nolan Principles and also the Code of Conduct in place for members and co-opted members of the Corporation. Each of the Panel members Register of Interests can be found online here: [Modern Council \(cityoflondon.gov.uk\)](#). The Panel is currently chaired by Amanda Orchard with Gary Rogers serving as Deputy Chair.
8. Seven full Panel meetings have taken place since July 2021. Agendas for these meetings are approved by the Chair. All full Panel meetings have been quorate in line with the Terms of Reference. The Terms of Reference are regularly reviewed to ensure that they remain fit for purpose. There is currently an annual meeting of the full panel with any further arranged to suit organisational requirements. The Panel also take the opportunity to share best practice and undertake training relevant to the roles at full meetings. The most recent meeting was kindly hosted by the Chief Commoner in February 2024.
9. Administrative and legal support to the Panel and all sub-panels is provided through the Town Clerk's, the Comptroller and City Solicitor's Department respectively. In any areas where legal advice is required, and there may be a perception that the Monitoring Officer's team might be in any way conflicted, external Counsel are called upon to provide legal advice to the panel.

Matters considered by the Panel from March 2022 – May 2024

Dispensations

10. The Panel have been asked to make recommendations on six applications for dispensation in this reporting period. The Panel would like to use this platform to encourage all seeking dispensations to complete the necessary applications in sufficient detail with reference to the guidance provided and in sufficient time so as to enable decisions to be taken. Of the six applications considered, the Panel had to adjourn the determination of two upon first receipt as they had insufficient information to enable proper consideration of these.

Alleged breaches of the Code of Conduct

11. The Panel have received a total of 11 formal complaints in this reporting period. The breaches formally considered and their outcome/current status are summarised below.

12. In accordance with the Complaints Procedure, the first determination at Assessment must be whether or not a complaint is admissible and meets the following tests:

- (i) It is a complaint against one or more named members of the Corporation;
- (ii) The named member was in office at the time of the alleged conduct and the code of conduct was in force at the time;
- (iii) The complaint, if proven, would be a breach of the code of conduct under which the member was operating at the time of the alleged misconduct;
- (iv) The complaint is about something that happened or came to light within the last three months, or is connected to alleged misconduct within the last three months, unless there are reasonable grounds for the complaint not having been made within that time period.

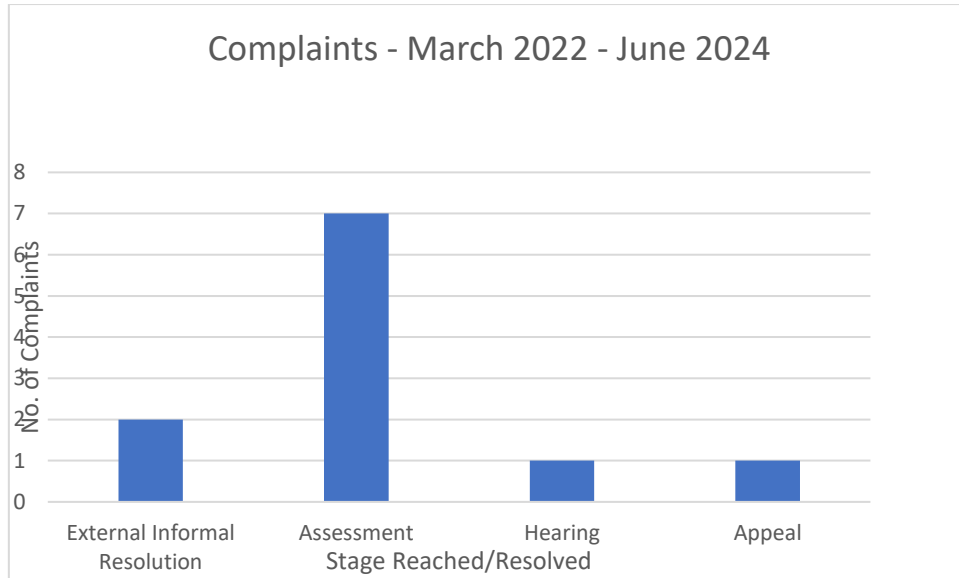
If the complaint fails one or more of these tests, it is deemed 'inadmissible' and cannot be investigated as a breach of the code and the complainant will be informed by the Town Clerk that no further action will be taken in respect of the complaint.

13. Should a Member be found to be in breach of the Code, there are a number of sanctions available to the Panel to recommend. These must be reasonable and proportionate in all of the circumstances. The available sanctions for a breach of the code of conduct are:-

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

14. There is no power to impose any alternative sanctions, although the willingness of a member to co-operate in the matters listed below may have a bearing on any sanction that is imposed:-

- (i) that the member submits a written apology in a form specified;
- (ii) that the member undertakes specified training;
- (iii) that the member participates in such conciliation as is specified.



Matter No.	Source of Complaint	Alleged breaches of the Code	Outcome/Status
01 - 22	Officer v. Members	<i>Failing to act with integrity; failing to comply with the Corporation's policies and procedures; failing to treat Officers with mutual respect; bullying and intimidation, bringing the office or authority into disrepute</i>	<i>Assessment ruled that no further action be taken. It was noted that all Members had offered to make an apology to the Complainant and were encouraged to make this in writing.</i>
02-22	Member v. Member	<i>Failing to value colleagues of the Corporation and engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance.</i>	<i>Referred from Assessment directly to Hearing. Hearing found subject Member in breach of paragraph 2(k) of the Code of Conduct and recommended a sanction of censure. Hearing recommendations upheld at Appeal. Hearing recommendations approved by the Court of Common</i>

			<i>Council. Subject Member censured.</i>
<i>03-22</i>	<i>Member v. Member</i>	<i>Failing to value colleagues of the Corporation and engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance.</i>	<i>Complaint deemed not admissible at Assessment</i>
<i>04-22</i>	<i>Public v. Member</i>	<i>Failing to act with integrity; failing to comply with the Corporation's policies and procedures;</i>	<i>Assessment ruled that no further action be taken.</i>
<i>05-22</i>	<i>Member v. Member</i>	<i>Failing to value colleagues and officers of the Corporation and engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance; Failing to treat people with respect, including the organisations and constituents that you engage with and those that you work alongside, and not bullying, harassing), intimidating or attempting to intimidate any person; Failing to uphold 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;</i>	<i>Assessment ruled complaint should be referred directly to Hearing unless within the next 14 days, both parties agree to the informal resolution of the complaint by way of a written apology. No apology forthcoming so referred to Hearing where the subject Member was found to be in breach of paragraphs (k), (l) and (n) of the Code of Conduct. A sanction of censure was recommended. A written apology and training for the subject Member was recommended. No Appeal lodged. Hearing recommendations approved by the Court of Common</i>

			<i>Council. Subject Member censured.</i>
<i>01-23</i>	<i>Public v. Members</i>	<i>Failing to value colleagues and officers of the Corporation and engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance; Failing to treat people with respect, including the organisations and constituents that you engage with and those that you work alongside, and not bullying, harassing), intimidating or attempting to intimidate any person; Failing to uphold 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; Failing to provide leadership through behaving in accordance with these principles when championing the interests of constituents with other organisations as well as within the Corporation.</i>	<i>Assessment ruled that no further action be taken</i>
<i>02-23</i>	<i>Public v. Members</i>	<i>Failing to register and declare any private interests, both pecuniary and non-pecuniary, that relate to public duties in a manner conforming with the procedures set out below.</i>	<i>Complaint deemed not admissible at Assessment</i>
<i>03-23</i>	<i>Member v. Member</i>	<i>Failing to value colleagues and officers of</i>	<i>Resolved via Informal</i>

		<i>the Corporation and engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance; Failing to uphold 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</i>	<i>Resolution (externally facilitated) on the agreement of both parties</i>
04-23	<i>Public v. Member</i>	<i>Bringing the office or authority into disrepute</i>	<i>Complaint deemed not admissible at Assessment</i>
01-24	<i>Co-optee v. Member</i>	<i>Failing to value colleagues and officers of the Corporation and engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local governance;</i>	<i>Resolved via Informal Resolution (externally facilitated) on the agreement of both parties</i>
02-24	<i>Public v. Members</i>	<i>Failing to adhere to all Seven Principles of Public Life</i>	<i>Assessment ruled that no further action be taken contingent on one of the subject Members undertaking to update their register of interests accordingly within a period of 28 days.</i>

15. The Panel therefore received 11 complaints in this reporting period, 3 were deemed inadmissible, it was decided that no further action be taken in relation to 4, 2 were upheld with a sanction and 2 were resolved via informal resolution facilitated by an external provider.

Conclusion

16. Over the almost three-year period that the Panel has now been active, a number of matters have been considered and refined as part of the formal Complaints Procedure now in operation. Informal resolution has now been expressly included in the revised Complaints Procedure with external mediation an option if agreeable by all parties involved. This has been very successfully deployed in some of our more recent cases. There has also been the inclusion of the need for any Member-on-Member complaints to first explore resolution with either the Chief Commoner or either the Chair of the General Purposes Committee of Aldermen or the Chair of the Nominations Committee of Aldermen, at an early stage to seek to resolve issues and maintain effective working relationships before proceeding through the formal process.

17. These changes have resulted in what is hoped by the Panel to be a more effective and efficient complaints process which is accessible and widely understood by both members of the public and members of the Corporation alike.

Appendices

- Appendix 1 – Panel Membership and Terms of Appointment
- Appendix 2 – Panel Terms of Reference

Appendix 1

PANEL MEMBERSHIP AND TERMS OF APPOINTMENT

Both the chair and members of the IRB have initially been appointed for a three year term.

The current IRB members are:

Name	
Andrew Ayre	Appointed 2023
Miranda Carruthers-Watt	Appointed 2021
Robert Coyle	Appointed 2021
Chris Fraser	Appointed 2021
Amina Hossain	Appointed 2023
Tom Kettleley	Appointed 2021
Karen McArthur	Appointed 2023
Amanda Orchard	Chair (approved to June 2025) Appointed 2021
Gary Rogers	Deputy Chair (approved to June 2025) Appointed 2021
Rahul Sinha	Appointed 2021
Philip Thicknesse	Appointed 2021
Atiyah Younis	Appointed 2021

Appendix 2

TERMS OF REFERENCE

Functions and Authority of the Panel

The Independent Persons Panel (the Panel) was established by the City of London Corporation Court of Common Council (the Corporation) by way of Court of Common Council Resolution on 14 January 2021.

The purpose and powers of the Panel is to establish and administer a Complaints Process and to also deal with the granting of Dispensations (the Scheme).

The Panel is to independently consider complaints made by anyone against an elected or co-opted member of the Corporation.

The Panel will also consider granting Dispensations for Members to participate in a particular item of business at a City Corporation meeting where a disclosable pecuniary interest exists that must be disclosed, relating to in any matter that is being considered.

The Panel has authority to develop the Policy on the process for dealing with complaints referring to any Sanctions that may be applied. The Panel is also authorised to consider Dispensations under the Scheme.

The Panel is responsible for providing from its membership, the persons to form Assessment, Hearing and Appeal Sub-panels, required to investigate and consider complaints, by informal and/or formal process under the Scheme.

The Panel considers all complaints referred to the Scheme and where formal process is followed will recommend to the Corporation the final outcome for approval. The Panel also issues the deciding determination on dispensation applications.

The Panel is responsible for developing a Policy for Publication of the outcomes of complaints, as recommended to the Corporation.

Membership

The Panel is formed of up to twelve members in total, comprised of all independent members.

All Panel members agree to follow the Nolan Principles and also the Code of Conduct in place for members and co-opted members of the Corporation.

The Panel will maintain a Register of Interests for all independent members which will be published on the City Corporation's Library webpages and updated regularly.

Independent panel members are selected by the Corporation. All appointments are for terms of up to two years, with a maximum of three terms being served.

Chair and Deputy Chair

The members of the Panel shall elect one of its members as Chair, and another member as Deputy Chair, both for a period of 12 months which can be renewed for a maximum of up to 36 months

Where the Chair is not present at a meeting, or is conflicted, the Deputy Chair will take the Chair for the meeting or for any conflicted item

Quorum, Frequency and Records of Panel Meetings

The Panel quorum is five.

The Panel will as standard meet annually each municipal year, but meetings may be cancelled or called more frequently if required.

The Panel shall hold additional meetings as required to deal with any business arising at the request of the Executive of the Corporation or at the request of two members of the Panel.

At least three weeks' notice of the time, date and venue of each Panel meeting shall be provided to all members. All relating paperwork will be issued to all no later than five clear working days before each meeting wherever possible.

It is acceptable for routine business to be conducted electronically.

The Secretariat of the Corporation will prepare minutes and provide each member with a copy. Such minutes will be reviewed at the next meeting and, subject to any amendment, agreed and will be signed by the Chair. The amendment of minutes shall not affect the validity of decisions taken by the panel in the meeting to which the minutes relate.

Duties

The Panel is responsible for establishing and maintaining a Complaints Process and applying the Sanctions Policy, both of which should be reviewed regularly

The Panel is also responsible for considering applications for dispensations submitted by Members.

The complaints process and any guidance will be available to all who want to make a complaint.

The Dispensations form and related guidance will be available to all who wish to submit an application for consideration.

The Panel, and its Sub-panels, are to have regard to the Complaints Process; any Sanctions specified in legislation or in any Sanctions Policy; the Policy and Guidance on the granting of dispensations under the Localism Act 2011; and the Members Code of Conduct when dealing with any complaints or dispensation requests before it.

All formal complaints and/or appeal recommendations will be referred to the Corporation for oversight approval. After the matter has been addressed by the Corporation the outcome will be published where the process requires this.

A recommendation or other outcome at any stage of the complaints process, will be recorded in writing and reported to the next full Panel meeting after the end of the full process for that complaint.

All determinations made by the Corporation will also be reported back to the Panel.

The Panel will adhere to best practice in terms of managing data and do so in line with the City of London Corporation Data Subject Rights Policy.

The Panel will produce an Annual Report that will be published.

Sub-Panels

Each Sub-panel will be comprised of up to three persons.

Appointments to Sub-panels will be undertaken on a rota basis. The Panel can select particular members for a complaint to replace any rota allocations, if specific skills are required to deal with a particular complaint. Also, allocations should ensure, as far as possible, a mix of persons to each Sub-panel to reflect the range of diversity within the panel.

A panel member cannot be part of more than one Sub-panel for each individual complaint.

Voting mechanism

The Panel or any Sub-panel, may vote on and determine any matter arising at the meeting and each member present at the meeting shall have one vote.

Decisions of the Panel or any Sub-panel shall be by simple majority of the votes cast (excluding any abstentions).

Last reviewed 29 February 2024.

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Committee(s): Member Development and Standards Sub-Committee	Date: 17/07/2024
Subject: Member Learning and Development Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	All
Does this proposal require extra revenue and/or capital spending?	N
If so how much?	N/A
What is the source of funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department	N/A
Report of: Town Clerk and Chief Executive	For Information
Report author(s) Gemma Stokley Principal Governance and Member Services Manager	

Summary

This report provides the Sub-Committee with an update in respect of the delivery of the Member Learning and Development programme to date, as outlined in the Members' Learning and Development Strategy.

The content of the report is a reflection of the work undertaken since the last meeting of the Sub-Committee on 8th March 2024; including delivery of Quarter 1 of the 2024/25 programme (April – June 2024). In accordance with the rolling programme approved by your Sub-Committee, Quarter 1 focused on information technology and various software applications. At the point of writing this report, all sessions advertised within Quarter 1 have taken place and an evaluation of those sessions combined with the evaluation of Quarter 4 are reported at this meeting.

In addition to the IT subjects of Quarter 1 an offering on Health and Safety Governance was delivered by internal and external experts. The offer had initially been directed to the full Court and then later advertised with a heavy focus on the memberships of the Corporate Service Committee, as the City's guardians of H&S governance responsibilities under Health and Safety Legislation.

Given that the primary focus for the remainder of this civic year will now be upon Member Induction and Refresher Programme offerings, it is proposed that the wider Learning and Development Programme be wound down for Quarters 3 and 4 to enable this to be prioritised. Proposals in respect of the longer-term Member Development offer will then be submitted to the Sub-Committee for consideration before the summer

recess in 2025, following a review and evaluation of the learning captured and feedback received during the Induction/Refresher Programme and once Members' on-going learning and development interests are better understood.

Recommendation:

Members are asked to note the report.

Main Report

Background

1. At its meeting of 8th March 2024, the Member Development and Standards Sub-Committee endorsed proposals for Quarter 1 of the new Civic Year (to be delivered in April-June 2024). In response to Members feedback a series of IT sessions sought to enhance their software skills. In a bid to increase attendance figures, several sessions were run at varied days of the week and varied times, to address comments from this Sub-Committee and general feedback from Members in relation to availability etc. The delivery and format of each session remained unchanged with hybrid attendance offered at every opportunity. The timings had been reduced to a maximum of an hour, where appropriate. Event recordings continued, to enable future viewing, however post viewing figures and attendance numbers have not significantly improved.

Current Position

2. The table below sets out offerings across Q1 (which has very recently concluded).

2024	Theme/Focus
Q1.	IT Skills <ul style="list-style-type: none"> - IT and Microsoft Office Skills - Cyber Safety from the City of London Police - Mod.Gov App training
	Health and Safety Governance

Future Quarters for 2024/25

3. It is proposed that the wider Learning and Development Programme be wound down from Quarter 2 (July 2024) onwards for the remainder of the civic year to enable preparations for a comprehensive Induction and Refresher programme to be prioritised. That being said, one event as already been diarised for Mid July which will focus on the City and its family of schools. Colleagues are still keen that this go ahead and be advertised to all in the usual way. Details of the planned sessions are captured in the table below.

4. Proposals in respect of the longer-term Member Development offer will be submitted to the Sub-Committee for consideration ahead of the summer recess in 2025, following a review and evaluation of the learning captured and feedback received during the Induction/Refresher Programme and once the on-going learning and development interests of a new cohort are therefore better understood.

The City and its Family of Schools	16 th July 2024 Cttee Rm 2 4.00pm - 5.00pm	All Members	An awareness of the systems, structures and governance of the City Family of Schools and education services delivered by the City of London Corporation.	Presentation and Q&A	Deborah Bell, Strategic Director of Education and Skills	Hybrid and Recorded session	In house
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Members' Portal

5. The Members' Portal has been in operation for the past 8-months therefore it was felt an appropriate time to review the use of the page, the layout and content, whilst taking into account comments of this Sub-Committee and general Member feedback. In a bid to improve the content, look and feel of the page several alternations have been made, with the aim of improving the user experience. The test page has been discussed in advance of this meeting with the Chairman of the Digital Services Committee and a Member of this Sub-Committee as both Members had previously discussed their experiences of the page and what they might find more useful.
6. The content and layout of the Portal post discussions with the wider group of Members and any suggested changes have been consulted with the Chair and Deputy Chairman of this Sub-Committee, a demonstration of the proposed amended layout and content will be provided to the Sub-Committee during this meeting. It is hoped that we utilise this page considerably as part of the New Member Induction Programme in 2025, to ensure it becomes a 'go-to' site for Member enquires.

Measurement and Analysis

7. Monitoring and analysis continues to form an important part of the delivery of the Member Development Strategy to ensure not only the appropriate use of resources, but to allow us to take forward learning to influence the future. We continue to deliver against this by reporting quarterly on the following metrics:
 - Course offerings for the previous quarter;
 - Course attendance figures;
 - Qualitative feedback for individual courses;
 - Budget and cost updates.
8. The latest update and evaluation of sessions that have taken place in Quarter 4 and Quarter 1 can be viewed at Appendix A of this report.

Corporate and Strategic Implications

Strategic Implications:-

9. The profile of the L&D function, both internally and externally, demonstrates Members' commitment to ensuring that they have the relevant skills to deliver on all areas of the City's Corporate Plan, including the ambitions to embrace best practice and to deliver on value for money requirements, and to support individuals to promote and cultivate communities within the organisation and amongst the City's resident population.

Financial Implications:-

10. The annual budget allocation of £9k made by the City Corporation for Member Learning and Development has and will continue to remain stable. There is a charge of £1,052.25 pending against this for the delivery of the recent Civica (Mod.Gov) training, leaving a total budget of £7947.75 for 2024/25 activities.

Resource Implications:-

11. The practice and intention is to actively seek out internal expertise before engaging external presenters. In Quarter 1 officers have researched what is being delivered in terms of Civica and Mod.Gov training and arranged a session with a presenter who comes highly recommended and have previously delivered sessions to officers within the Town Clerk's Department. The cost for the session including pre and post event preparation is £1,052.25. This is the single budgetary spend in this quarter.

Risk Implications:-

12. The success of the Member Learning and Development Programme is reliant on Member engagement. If the offer is not sufficiently appropriate or engaging, objectives will not be met. If successful, the delivery of the Strategy ought to help mitigate against corporate risks across the organisation, with Members being better equipped to discharge their various responsibilities. In this Quarter the programme has been delivered according to plan, however Member attendance remains a concern. Officers have, following requests and comment, revised the method by which Members are notified of upcoming sessions. A Microsoft Teams invitation is now circulated to the full Court on each occasion with those wishing to attend encouraged to accept the invitation. However an acceptance of the invitation has proved not to be a reliable method of calculating attendance to date. Officers welcome consideration and comments from the Sub-Committee regarding how to increase attendance figure and improve Member interest/response rates moving forward.

Equalities Implications:-

13. Under the Equality Act 2010, all public bodies have a duty to ensure that when exercising their functions they have due regard to the need to advance equality of opportunity between people who share a protected characteristic and to take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people and encourage people with certain protected characteristics to participate in public life or in other activities

where their participation is disproportionately low. The proposals contained in this report do not have any potential negative impact on a particular group of people based on their protected characteristics. Instead, the strategy will ensure that the programme is accessible to all Members and would accommodate those requiring support to enable all delegates to have the same opportunities. Where possible, reasonable adjustments will be made to allow equality of access.

Climate Implications:-

14. There are no climate implications arising from this report.

Security Implications:-

15. There are no security implications arising from this report.

Conclusion

16. This report presents an update on the delivery to-date of the Member Learning and Development programme, and Members' are invited to comment and offer reflections and alterations to the offerings in Quarter 2 and considerations in terms of the headlines for Quarter 3.

Appendix

Appendix A – Evaluation of Quarter 4 (January – March 2024) and Quarter 1 (April – June 2024)

Contact:

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Member Learning and Development Programme

Draft Evaluation of Quarter 4 January – March 2024 and Quarter 1 April to June 2024

1. The purpose of this paper is to provide the Member Development and Standards Sub-Committee with a snapshot of the learning and development sessions that have taken place in Quarter 4 (January 2024 to March 2024) and Quarter 1 (April 2024 to June 2024) of the programme.
2. In response to feedback from this Sub-Committee and Members in general, officers seek to be more responsive to Members asks. The focus of Quarter 4 supported Members mental health and wellbeing, with Quarter 1 seeking to dedicate sessions to information technology, enhancing and plugging knowledge gaps in this respect.
3. Taking advice from this Sub-Committee, and in an attempt to attract and engage with Members in a more efficient way, individual Microsoft Outlook invitations were circulated to all Members, with session details for all offerings in Quarters 4 and 1. Members continued to be signposted to the Portal to access full course details and further information as to how to register their interest/attendance. Reminders of each session were communicated using chaser emails. Officers continued to offer a range of days of the week and times in the hope of maximising attendance. The number of Members accepting invitations via Outlook has increased however the actual numbers of Members attending on the day continues to be varied.
4. At the conclusion of each session an individual evaluation form is circulated to all attendees, in the room or online, followed by a chaser email a week later to help improve the response rate.
5. For ease of reference the following table provides an overview of offerings for Quarter 4 and Quarter 1, course attendance figures, qualitative feedback from individual courses and any budgetary implications. This is followed by a more in-depth review of each session.

Title of the Event	Date and Time	Offered to	Members in attendance
Quarter 4 – January – March 2024			
Mental Health Tool Kit for Members	Thursday 29 th February 9.30am to 11.30am	All Members	Session cancelled as the minimum 8 Members attending was not achieved
Mental Health for City of London Councillors	Monday 11 th March 5.15pm – 6.45pm	All Members	7 in person 8 online (15)
Quarter 1 – April – June 2024			
IT and Microsoft Office Skills – repeated later in the quarter	Thursday 18 th April 2.00pm – 3.30pm	All Members	3 in person 3 online (6)
IT and Microsoft Office Skills	Wednesday 8 th May 3.00pm – 4.30pm	All Members	1 in person 1 online (2)
Health and Safety Governance	Friday 17 th May 2024 – 10.00am – 12.30pm	All Members (targeted group – Corporate Services Committee)	4 in person 1 online (5)
Cyber Security - repeated later in the programme	Wednesday 12 th June – 4.00pm – 5.00pm	All Members	5 in person 6 online (11)
Cyber Security	Thursday 13 th June 2.00pm – 3.00pm	All Members	2 in person 6 online (8)
Civica and the Mod.Gov App	Monday 17 th June	All Members	0 in person 12 online (12)
Civica and the Mod.Gov App	Thursday 25 th June	All Members	1 in person 4 online (5)

Mental Health for City of London Councillors Monday 11th March 5.15pm – 6.45pm

6. The purpose of this session was to enable Members to discuss evidence-based techniques to support mental health and wellbeing and how to effectively use local government powers to create mentally healthier circumstances with residents, workers and visitors in the Square Mile. Designed and delivered by an external presenter who came highly recommended having previously served as a senior London Councillor for 12 years, a Local Government Association Expert Peer for a decade, a public health master's graduate of King's College London and a policy and public affairs lead at the Centre for Mental Health. The session was evaluated

positively and the general consensus was that Members would recommend the session to their peers.

7. The session was offered to all members of the court, 12.50% (10) Members showed interest in attending, however on the day 2 members did not attend and an additional 5 Members attended taking the total attendance figure to 20% (16) of which 7 members attended in person and 9 accessed the session online.
8. The post session evaluation was based on the comments of 6 respondents, 100% stated the session outcomes were met. On a scale of 1 -5, with a '5' rating meaning highly recommend, respondents average rating was 4.83. All 6 respondents felt that the presenter was knowledgeable and able to answer all their questions.
9. It was commented that the session should be made compulsory for all Members. with one response stating that "I thought it would be less about my mental health and more about coping with trolling online, bad behaviour from others" with another respondent stating that they thought that the session would be more about mental health personal management techniques. When asked if Members would find this session useful, two respondents stated that it was very informative and worth repeating.

IT and Microsoft Office Skills 18th April, repeated 8th May 2024.

10. The desired outcome of this session was to support and build confidence in individuals IT skills to assist in capacity and productivity. Using a range of examples of the tools available, demonstrations were provided and practical advice given.
11. In a departure from the standard format, this session was presented in two parts, the first hour consisted of a presentation followed by a Q&A where Members had the opportunity to ask specific questions related to the presentation and their own experiences. The second hour was delivered as a "drop in session" when Members were provided with 1:2:1 support and guidance related to their specific needs. Both part 1 and 2 of the session were received positively.
12. Of the 6 Members in attendance, 4 Members completed the post session evaluation, there was a 50:50 split between the desired outcome being achieved or partly achieved. One Member commented that the presentation was too frequently interrupted with individual queries detracting from the information that could have been presented to all. It was felt that the presenters were knowledgeable and able to respond to questions.
13. Comments were favourable in terms of the content and presentation, however it was stated by several of the respondents that there should be more sessions available and that this was a good starting point. The IT team have reiterated that they hold drop-in sessions monthly before each Court of Common Council in the Members' Reading Room. This may need to be more widely and pro-actively advertised in future to attract more attendance.

Health and Safety Governance Friday 17th May 2024 – 10.00am – 12.30pm

14. The session sought to educate and update Members on discharging their governance responsibilities under Health and Safety Legislation. This was achieved through a series of discussions, examples and insights into the impacts of governing safety. The session was delivered by internal and external experts who provided relevant examples of what good practice looks like.
15. The subject being 2.5hrs long, engaged the Members and received 100% post session evaluation and feedback. All respondents felt that the objectives of the session had been met, that the presenters were knowledgeable and able to answer all of their questions and that they would recommend this offering to their colleagues and peers.
16. Comments made to support the session included “this is a must watch for all Members”, the suggestion to run this session prior to a committee meeting to capture Members and increase attendance was made. General comments included, sending the link to the recording of the session to all members and that “it would be great to revisit key points in a few months’ time”.

Cyber Security – Wednesday 12th June – 4.00 – 5.00pm and Thursday 13th June 2.00-3.00pm

17. This baseline briefing incorporated information as to the psychology behind hackers and defenders and featured the latest advice and insights from industry experts and the NCSC, as well as offering examples of modern cyber security breaches. The briefing was specifically designed to raise attendees’ baseline level of knowledge.
18. Feedback thus far has been positive with a unanimous ‘highly recommended’ rating and a comment that ‘it was excellent.’

Civica and the Mod.Gov App – Monday 17th June and Tuesday 25th June 2.00-3.00pm

19. These sessions were designed to support Members’ use of Mod.Gov and provide an introduction to the Modern.Gov App.
20. Anecdotally, those in attendance were keen for the App to be more actively promoted amongst all Members. Formal feedback received stated awareness of the app and training should be brought to the direct attention of all members, for example during an informal court. Members expressed frustration of not having access to the to the app prior to or during the session, and therefore could not benefit from the session. It would have been beneficial to have IT present to help Members install the app during the session.

General Comments and Future Sessions

21. Members making general comments and taking the opportunity to influence future offerings included, as previously stated, that some sessions should be made compulsory.
22. Delivering regular IT skills sessions, and more actively promoting the regular “IT drop in” sessions would be useful.
23. Further suggestions of future sessions included chairing meetings and minute taking.

Post Event Activity

24. Several of the sessions were recorded to enable Members that were unable to attend the sessions to view the recording as new information for non-attendees or as a refresher for those in attendance. The post session viewing figures remain low and are unsuccessful in engaging a higher percentage of Members. However, the record of sessions is available to support newly elected Members and is also offered to officers new to the Corporation.

Budget and Costs

25. Value for money has been a contributing factor in delivering the programme and it can be reported that to-date £1,450 for the financial year 2023/2024 and £1,050 for Quarter 1 of the current financial year has been charged to the annual budget of £9,000 held by this Sub-Committee. Quarter 1 expenditure was related to the “Civica and Mod.Gov App” sessions delivered externally by professionals at Civica.

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Committee(s): Member Development and Standards Sub-Committee	Date: 17/07/2024
Subject: Member Induction Arrangements 2025	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	All
Does this proposal require extra revenue and/or capital spending?	N
If so how much?	N/A
What is the source of funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department	N/A
Report of: Town Clerk	For Decision
Report author(s): Gemma Stokley	

Summary

This report updates the Sub-Committee on the 2025 Member Induction preparations and the proposed programme for new Member induction which will be delivered immediately after the ward elections on 19/20th March 2025 and, thereafter, up until Summer recess 2025.

A range of activities are already underway to support the wider Member Induction Programme, including compilation of a new Member e-Handbook and a programme of high-level and deep-dive briefings that will be made available to all Members. This report sets out more detailed proposals for the weeks, and thereafter the quarter, that immediately follow the elections following the broader overview provided at your last meeting.

Recommendation

The Sub-Committee is asked to note the contents of this report and the 2025 Member Induction proposals for the initial few weeks and the first quarter following election as they currently stand. Members are invited to comment on the proposals and offer their views in respect of the proposed timetable and focus for delivery of the initial induction and the following Induction/Refresher programme arrangements.

Main Report

Background – Historic Induction Arrangements

1. The City Corporation's 'all out' Ward elections (in contested wards) will take place on 20th March 2025, and it is proposed that a comprehensive Induction and Refresher programme be offered to all Common Councillors in the quarter after this date (April – June 2025).
2. The induction programme that followed the 2022 Ward elections was very well received by the 37 newly elected Members (a 'turnover' of 37% of Common

Councillors). Due to the positive feedback received by the Town Clerk and the level of Member engagement in the programme after March 2022, by both new and returning Members, the 2025 induction programme intends to follow a similar format and to consider the areas of activity that Members found most useful.

3. In 2022, the Member Induction programme offered Members an appropriate mixture of hybrid briefings that were intended to be helpful and informative to both new and returning Members, although some activities were tailored to the needs of newly elected Members i.e. our initial New Member Induction Briefing.
4. A comprehensive Member Induction Booklet and Key Documents Pack were circulated to all newly elected Members on Induction Day and thereafter sent, via email, to all Members for their general information. The documentation was well received and viewed as a useful guide for all. It is our intention to keep the 2025 Member Induction handbook updated in real time so that this can be used as and when new Members join the Court after March 2025 and be made available at all times on our Members Portal.
5. In addition to the above activities, a supper for newly elected Members, hosted by the Chairman of the Policy and Resources Committee, took place in the Members' Private Dining Room during the Induction period and provided new Members with the opportunity to hear directly from the Policy Chair about his vision and the City Corporation's priorities. It also provided a good forum in which the new Members could share views and learn more about one another. There was very positive feedback following the supper and those Members who raised specific queries received comprehensive responses after the event.
6. The Chief Commoner also hosted an all-Member reception which enabled new and returning Members to get to know one another in a less formal setting.

Work to Date and Next steps

7. In looking at the timetable for delivery of the 2025 Member Induction Programme, the calendar of meetings has been carefully reviewed. The date of the April 2025 Court of Common Council meeting is yet to be confirmed (but will be known by the time of the meeting) and, at present, a fair portion of April 2025 is taken out by the Easter recess period.
8. With that in mind, we wanted to focus specifically on which sessions might be considered most valuable to offer to new and returning Members in the first three weeks following election. The week commencing 24th March will be occupied with New Member Induction Briefings which leaves the w/c 31st March 2025 and 7th April 2025 as a primary focus ahead of April Court and any Committee appointments.
9. Subject to Members' views, the following timetable and activities are therefore proposed immediately after the elections on 20th March 2025:
 - **New Member Induction Briefings** – A choice of sessions on either Monday 24th March (from 4pm), and Wednesday 26th March (from 9am)

- **Fresher's Fayre Event** – To be held ahead of April 2025 first Court meeting – to tie to New Member Induction Briefing events or hold as stand alone event
 - **All-Member Reception** (hosted by the Chief Commoner) – date to be confirmed.
 - **Policy Chair's supper** – date to be confirmed by Policy Chair's Office.
 - **Induction Programme for new and returning Members** – A series of key briefing sessions (hybrid) more deliberately tailored to new Members (e.g. your first Court meeting) will be delivered between 31st March 2025 and 11th April 2025, ahead of the Easter recess period ('Phase 1'). Thereafter, a broader series of hybrid sessions and visits delivered between 6th May 2025 and 25th July 2025.
10. Some thoughts on each aspect of the programme set out above, are detailed in paragraphs 12 to 28 and Members' views are invited so these proposals can be further developed.
11. As has been the case in previous years, we would like to provide candidates with details of the induction arrangements prior to the election so events can be diarised by all in good time in order to ensure maximum engagement. The nomination period for candidates wishing to stand in the 2025 elections opens in the week commencing 17th February 2025 and closes on 25th February 2025. During this period, information packs will be available to anyone considering standing for election. In addition to including details about the induction programme within these packs, we will also refer to the Declaration of Office and the Register of Interest, both of which must be submitted within 28 days of the election. In advance of the nomination timetable, events will be held at Guildhall, to which all potential candidates will be invited to attend and be provided with registers, information packs and guidance. Noting the above timescales, the final 2025 induction programme/offering will therefore ideally be signed off by the Member Development and Standards Sub-Committee in early 2025. The Steering Group is currently scheduled to meet on 30th January 2025.

New Member Induction Briefing and 'Fresher's Fayre' Style Event

12. It is proposed that instead of just one New Member Induction briefing, a choice of sessions be offered in 2025 to better cater for all. These are proposed to take place on Monday 24th March - 4pm onwards and Wednesday 26th March from 9am . We are proposing to hold a 2-3-hour session on each occasion which will provide new Members with key information, signposting and the opportunity to ensure that formal paperwork such as the Members' Code of Conduct are completed. Several practical issues can also helpfully be addressed at this stage such as providing new Members with a tour of the Guildhall complex, specifically the Members' areas; the issuing of security passes; the distribution of IT kit; the allocation of pigeon-holes and robe fittings. New Members will inevitably have a lot of information to digest and much of this can better be provided over a longer period over the proceeding weeks.
13. The format of the New Member Induction Briefing held in 2022 is set out at appendix 1. It is proposed that a similar format be adopted, and discussions are

already underway with the Town Clerk, Deputy Town Clerk, the Chamberlain, the Comptroller and City Solicitor, the Head of IT, and the Policy Chair about this. We would also welcome the Sub-Committee's views at this stage on format and content.

14. It is proposed that the cost of any food and refreshment for these sessions will be met from the Member Development budget.
15. Officers from the Governance and Member Services Team will support delivery of the Induction Briefings.
16. Based on feedback from the Sub-Committee we will also be exploring the possibility of holding a 'Freshers Fayre' style event either as a stand-alone offer or in the margins of the initial Induction Briefings. Given that it may influence which Committees new Members wish to stand for, it is envisaged that this ideally take place ahead of the April 2025 Court meeting. We would expect all major departments to host a 'stall' setting out what they do, which Committees they report into and information as to key documents (the City Plan for example), live issues and key contacts for Members to take away. Where possible and where they may be returning Members, Committee Chairs may also wish to attend and meet new Members in a less formal setting. This would be a new element of the 2025 Induction offering and any additional direction that the Sub-Committee might have as to format and delivery would be extremely helpful at this juncture ahead of plans being progressed further.

All-Member Reception (hosted by the Chief Commoner)

17. It is proposed that an early evening, All-Member, Reception, hosted by the Chief Commoner, take place in the initial weeks of the induction programme. The 2022 reception, took place between 5.30pm and 8pm, and followed the first meeting of the Court of Common Council in April. All Members and Chief Officers were invited to attend. Again, the Sub-Committee's views on format and invitees would be welcome ahead of plans being finalised. This is provided for information. Any observations on the event will be provided to the Chief Commoner for their consideration ahead of planning for the 2025 event.

Policy Chair's Supper

18. It is proposed that the Policy Chair once again hold a supper for all newly elected Members early on in the programme to provide all with an opportunity to meet one another as well as some key Officers in a less formal setting and to pose specific queries of the Chair as to his vision and wider corporate priorities. This is provided for information. Any observations on the event will be provided to the Policy Chair for their consideration ahead of planning for the 2025 event.

**New Member Induction Programme 2025
31st March 2025 - 11th April 2025 – Phase 1**

19. Given that a period of two weeks in April is taken out by the proposed Easter recess period in 2025, Officers are of the view that the first three weeks following election should be focused primarily on sessions for new Members. This will commence with a choice of Initial New Member Briefing slots during the week commencing 24th March 2025.
20. It is proposed that the weeks commencing 31st March and 7th April 2025 then feature those sessions considered key to new Members. Sessions proposed for this initial period at present are:
- Member Code of Conduct – if proposed changes to the Code of Conduct are approved by Court in Autumn 2024 this will have the effect of making attendance at this training mandatory. New members will therefore need to attend prior to any Committee appointments at the April 2025 Court.
 - How the Decision-Making Process Works
 - Court of Common Council – Your First Meeting – a briefing session to be supplemented by rehearsals held alongside colleagues in Remembrancer's on Court day
 - Corporate Plan
 - The City's Finances/Financial Framework
 - Drop in IT Support sessions

It is hoped that these could be repeated across the two-week period (particularly the Code of Conduct training should this be deemed mandatory by this stage) with a mixture of morning, lunchtime and early evening slots set aside. It is proposed that all sessions be offered in a hybrid format and that all are also recorded and made available on the Members' Portal to enable Members to re-visit at their leisure.

21. Ahead of finalising sessions with relevant officers we would appreciate the Sub-Committee's views as to session content so that, on this occasion, we might provide more of a steer in this respect, striking the best possible balance between what new Members need to know around each subject to fulfil their roles to the best of their ability from the outset whilst also being cognisant of the need to not overwhelm them with information.

6th May 2025 – 25th July 2025 – Phase 2

22. Early discussions are already underway with relevant officers to consider the format of the broader Induction and Refresher Programme which will be delivered as of 6th May 2025 and through to the summer recess. As in previous years, it is proposed that a schedule of face-to-face/hybrid briefing sessions be developed in consultation with various Chief Officers but with those sessions available, for the most part, to all Members and delivered over a longer period.
23. The programme would offer a mixture of morning, lunchtime and early evening slots that will be set aside, around the formal schedule of committee meetings, to allow Chief Officers to deliver a series of briefings on relevant corporate issues

and priorities. Taking on board previous feedback as to session length, each will take the form of a 90-minute offering.

24. A series of headline briefings will also be scheduled with key officers outlining cross-cutting themes, activities and corporate priorities around culture, climate, enabling functions, scrutiny, and strategy. It would also be useful to clarify the role of institutions and the role/responsibilities of Members working with those institutions.
25. The Corporation aspires to be a leader in equality and inclusion, serving a wide range of communities including staff, residents, businesses, and the workforce of the Square Mile. An important element of the Induction Programme will therefore be to stress the Corporation's commitment to equality, diversity, and inclusion at every level as a public authority.
26. Training on any committee-specific issues will also be rolled out to Members as Committee memberships are established and a series of visits, if thought to be useful, will also be explored. This could include visits to the City's Schools, the Old Bailey, Mansion House and the Open Spaces for example.
27. Some more practical skills sessions will also be available during this period i.e. Chaining Skills for new Chairs.
28. The programme of events held over the quarter following election in 2022 is attached at **Appendix 2**. Members views as to which sessions they might like to see repeated or replaced are sought at this stage. It would also be helpful to have a broad steer from the Sub-Committee as to what 'headline issues' each session might helpfully cover so that this steer can be offered to those Officers presenting in advance of their sessions being developed over the coming months.

Other Induction Activities and Support to New Members

32. In addition to the formal Induction offer of briefings and visits, all newly elected Members will receive ongoing practical and pastoral support from the Governance and Member Services Team, the Remembrancer's Department, the Chief Commoner, Member buddies, Aldermen and relevant Ward Deputies.
33. A comprehensive Members' Induction Pack is also currently being compiled and will include updated guidance and clarification on a range of issues. The 2022 Member Induction Handbook was shared at your last meeting and it is proposed that the format be refreshed for 2025.
34. We are hoping that the E-Handbook (previously issued as a PDF) might be integrated through the Member Portal Page so that Members can access up-to-date information at any time. This will also ensure that there is a helpful and accurate resource available as and when by-elections are held. In the event this is not feasible, a like-for-like update will be provided. We do, however, still feel a physical hand out (perhaps highlighting the information available via the portal and how to access it) will be necessary for the induction sessions.

35. Another suggested new initiative for 2025 is the introduction of returning Members as buddies. The view of Members was that this should not be over formalised and so the intention would be for the Town Clerk, on behalf of the Chief Commoner, to contact all existing Members intending to re-stand prior to election and seek any expressions of interest to serve in this capacity. Members could be asked to submit a statement of no more than 300 words outlining their relevant qualities/expertise so that these might be considered by the Chief Commoner and Deputy Chair of MDDSC, in consultation with the Assistant Town Clerk in good time and a pool of Members appointed in this capacity with their contact details then shared within any induction material.

Future Member Development Activities

36. Proposals in respect of the longer-term Member Development offer will be submitted to the Sub-Committee for consideration before the summer recess in 2025, following a review and evaluation of the learning captured and feedback received during the Induction/Refresher Programme and once Members' ongoing learning and development interests are better understood.

Corporate & Strategic Implications

37. Ensuring that we have a comprehensive, 'fit-for-purpose' Member Induction and longer-term Member Development Programme promotes high standards of corporate governance throughout the organisation and demonstrates support and democratic services which meet the needs of our elected Members and electorate.

Financial Implications

38. There is an annual budget allocation of £9k made by the City Corporation for Member Learning and Development. There has been no spend recorded against this to date for the 2024/25 financial year but there is a pending charge of £1,052.25 for the delivery of the recent Civica (Mod.Gov) training during Quarter 1, leaving a total of £7,947.74 at the time of writing.

Resource Implications

39. No further resource implications have been immediately identified following previous reporting. The vast majority of learning and development events proposed will be offered in-house, unless otherwise directed by this Sub-Committee. Where relevant, subsequent reports setting out the final Induction offering will set these out in greater detail.

Legal Implications

38. Members are asked to note the City Corporation's duty, under the Localism Act 2011, to promote and maintain high standards of conduct by Members and co-opted Members.

Risk Implications

39. The success of the Member Learning and Development Programme is reliant on the level of Member engagement. If the offer is not sufficiently appropriate or engaging, objectives will not be met. If successful, the delivery of the Strategy ought to help mitigate against corporate risks across the organisation, with Members being better equipped to discharge their various responsibilities. Member conduct represents a potential reputational risk to the organisation, together with a practical risk associated with a failure to attract and retain high quality Members and Officers should there be a negative working environment. It is, therefore, in the interests of the Corporation to take such steps as are required to foster a positive and inclusive working environment for its Members and Officers.

Equalities Implications

40. Public bodies have a duty under the Equality Act to have due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and people who do not share it; and foster good relations between people who share a protected characteristic and those who do not. The proposals contained in this report do not have any potential negative impact on a particular group of people based on their protected characteristics, rather they seek to actively foster good relations between and equality of opportunity for all. Officers will ensure that the Induction/Refresher offering is accessible to all Members and would accommodate those requiring additional support to enable all delegates to have the same opportunities. Wherever possible, reasonable adjustments will be made to allow equality of access.

Climate Implications:

41. There are no climate implications arising from this report.

Security Implications:

42. There are no security implications arising from this report.

Conclusion

43. The Member-led learning and development programme remains an important aspect of the organisation's Member Services offer to each of its elected Members. We are continuing to strive to ensure that Members view the programme as their resource, tailored to their needs and to give them access to

the skills, knowledge, and expertise with which to conduct their role as a representative for those who live and work in the City.

44. In advance of the Ward elections on 20th March 2025, the priority is to develop and deliver an engaging, accessible, and useful Member Induction Programme which will be delivered as of 24th March 2025. The wider programme should also provide opportunities for returning Members to further develop, enhance and share their skills, knowledge, and experience about how the organisation works and their role as elected Members in developing and delivering corporate priorities in increasingly challenging and changing circumstances. The Sub-Committee is therefore asked to note the contents of this report and the 2025 Member Induction proposals as they currently stand. Members are invited to comment on the proposals and offer their views in respect of the proposed timetable and focus for delivery of the induction arrangements so the final programme can be approved by the end of January 2025.

Appendices

- Appendix 1 – New Member Induction 2022 Flyer
- Appendix 2 – Member Development and Induction Plan Programme of Events Flyer (2022)

Gemma Stokley

Principal Governance and Member Services Manager

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New Member Induction Briefing

Venue: Committee Rooms 3 and 4, West Wing Guildhall.

Date: Monday, 28th March 2022 between 10am and 2pm

10.00am – 10.15am	<i>Refreshments and Registration</i>
10.15am – 10.40am	Introduction and Welcome (John Barradell, Town Clerk & Chief Executive)
10.40am – 10.50am	Welcome from the Chief Commoner, Deputy Brian Mooney
10.50am – 11.30am	The Role of the Governance, Members and Electoral Services – Decision making, corporate governance and the provision of advice and support to Members (Greg Moore, Assistant Town Clerk and Gemma Stokley/Polly Dunn, Principal Governance and Members' Services Managers)
11.30am – 11.40am	<i>Refreshments</i>
11.40am – 12.15pm	Introduction to the City Corporation's financial framework (Caroline Al-Beyerty, Chamberlain)
12.15pm - 12.30pm	The Member IT Offering (Ellen Murphy, IS - VIP Support Team)
12.30pm – 2.00pm	<i>Lunch/Networking and 'Set up Activities'</i> The following activities will be completed within this period whilst a buffet lunch is available: <ul style="list-style-type: none"> • Photographs for security passes to be taken in Chairman's Room 2, 2nd Floor, West Wing. • Members' IT requirements logged (Ellen Murphy) • Guidance on the Code of Conduct and, where possible, the completion of mandatory forms
At the conclusion of lunch – 2.00pm	Tour of the West Wing, Guildhall: <ul style="list-style-type: none"> • Robes will be fitted and allocated in the Committee Room waiting area in smaller groups of approx. 6-8 (The Remembrancer's Team) • The Town Clerk's Department • Postroom • Members' IT Room and Members' Areas • Chairmen's Rooms and Committee Rooms • Guildhall Club • Great Hall/Livery Hall

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MEMBER DEVELOPMENT AND INDUCTION PROGRAMME

Pre-register for your preferred sessions at:

Polly.Dunn@cityoflondon.gov.uk

Gemma.Stokley@cityoflondon.gov.uk

N.B. Virtual attendance via Microsoft Teams can also be facilitated

<i>Session</i>	<i>Time, Date and Location</i>
Cross-Corporation Climate Action Strategy	10.00am-12 noon, Monday 4 April Committee Rooms 3 and 4, Guildhall
The Court of Common Council - Your First Meeting	10.00am-12 noon, Tuesday 5 April Committee Rooms 3 and 4, Guildhall
Media and Communications	10.30am-12 noon, Wednesday 6 April Committee Rooms 3 and 4, Guildhall
How the Decision-Making Process Works	10.00am-12 noon, Tuesday 12 April Committee Room 2, Guildhall
Member Code of Conduct	10.00am-12 noon, Wednesday 13 April Committee Rooms 3 and 4, Guildhall
Procurement Awareness	10.00am-12 noon, Tuesday 19 April Committee Rooms 3 and 4, Guildhall
Equality, Diversity and Inclusion	10.00am-12 noon, Wednesday 20 April Committee Rooms 3 and 4, Guildhall
All Member Reception hosted by the Chief Commoner	Rising of Court, Thursday 21 April Members' Dining Room, Guildhall
The City's Financial Framework	9.00am-11.00am, Monday 25 April Committee Room 2, Guildhall

Pre-register for your preferred sessions at:

Polly.Dunn@cityoflondon.gov.uk

Gemma.Stokley@cityoflondon.gov.uk

<i>Session</i>	<i>Time, Date and Location</i>
Member Code of Conduct	3.00pm-5.00pm, Tuesday 26 April Committee Rooms 3 and 4, Guildhall
Major Programmes Portfolio	9.00am-11.00am, Wednesday 4 May Committee Room 2, Guildhall
Procurement Awareness	3.00pm-5.00pm, Friday 6 May Committee Room 3, Guildhall
Policy Chair's Supper	Evening, Monday 9 May Members' Dining Room, Guildhall
Member Code of Conduct	9.00am-11.00am, Thursday 12 May Committee Rooms 3 and 4, Guildhall
Corporate Parenting in the City of London	2.00pm-5.00pm, Friday 13 May Committee Rooms 3 and 4, Guildhall
Competitiveness Strategy	2.00pm-5.00pm, Wednesday 18 May Committee Room 1, Guildhall
Office of the Lord Mayor: Mansion House and Shrievalty	2.00pm-5.00pm, Friday 20 May Committee Room 1, Guildhall
Zero Based Review (joint session of the Chief Operating Officer's, Chamberlain's and Commercial Departments)	9.00am-11.00am, Monday 23 May Committee Rooms 3 and 4, Guildhall
Charity Review	9.00am-11.00am, Thursday 26 May Committee Room 3, Guildhall
The City's Relations with Parliament	9.30am-11.00am, Monday 6 June Committee Rooms 3 and 4, Guildhall
Corporate Plan (Current and Future)	2.00pm-4.00pm, Monday 6 June Committee Rooms 3 and 4, Guildhall
Member Code of Conduct	2.00pm-4.00pm, Wednesday 8 June Committee Room 2, Guildhall
Destination City	9.30am-11.00am, Monday 13 June Committee Room 2, Guildhall
Organisational Performance and Officer Governance	2.00pm-4.00pm, Monday 13 June Committee Rooms 3 and 4, Guildhall

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