

# Report – Policy and Resources Committee

## Panel of Independent Persons Report

*To be presented on Thursday 9<sup>th</sup> October 2025*

*To the Right Honourable The Lord Mayor, Aldermen and Commons  
of the City of London in Common Council assembled.*

### 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 May 2024. This is a report of the Independent Panel but in order to facilitate submission to the Honourable Court this day, it has been reviewed first by your Member Development and Standards Sub-Committee and your Policy and Resources Committee.

### RECOMMENDATION

That Honourable Members are asked to **note** the contents of the report.

### MAIN REPORT

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. This was following an independent Governance Review of the City Corporation, which proposed the establishment of an Independent Panel composed only of independent persons (convening as smaller sub-Panels of three), to receive allegations of misconduct under the Code of Conduct, determine whether to investigate, present findings to the Court, and hear any appeal. The Panel also has responsibility for making recommendations as to whether or not dispensations should be granted or refused.
2. The Panel was formally established in July 2021, initially of nine members, with a further three members approved in October 2023, to bring the Panel to a total of twelve 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.
3. Details of all current members of the Panel can be found at Appendix 1. The Panel's current terms of reference are attached at Appendix 2 of this report, drafted by the Panel and subsequently received by this Honourable Court in October 2022.
4. Following the resignation of two Panel Members, the Panel currently sits at ten members. During its annual meeting, the Panel agreed that two existing Independent Persons would also 'rotate off' the Panel, ending their terms at the end of 2025, and allow for the recruitment of three (now four) new Independent Persons to the Panel. A recommendation on the recruitment of four new members

of the Panel is envisaged to be presented to this Honourable Court by December 2025, following a recruitment campaign to be held over the Autumn.

5. 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 May 2024 to June 2025.

### **Operation of the Panel**

6. 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. The Panel was chaired by Amanda Orchard until June 2025, with Robert Coyle chairing the Panel from June 2025. Tom Ketteley serves as Deputy Chair from June 2025. He replaces former Deputy Chair Gary Rogers who resigned in January 2025.
7. Eight full Panel meeting 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. The Panel currently arranges an annual meeting, with any further meetings arranged to suit organisational requirements. The Panel also take the opportunity to share best practice and undertake training relevant to their roles at full meetings. The most recent meeting was kindly hosted by the Chief Commoner in February 2025.
8. Administrative and legal support to the Panel and all sub-panels is provided through the Town Clerk's Department, and Comptroller and City Solicitor's Department, respectively. Where there may a perception that the Monitoring Officer's team might be in any way conflicted, or it is otherwise considered beneficial to obtain independent legal advice, external Counsel are called upon to assist the Panel.

### **Matters considered by the Panel from May 2024 – June 2025**

#### *Dispensations*

9. The Panel have been asked to make recommendations on two applications for a 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.
10. The outcome of the recommendations for all requests for a dispensation are published in the Register of Dispensations online. This also includes the certain types of straightforward requests for a dispensation that are granted by the Town Clerk via delegated authority, and those requests granted under urgency procedures by the Monitoring Officer.

#### *Alleged breaches of the Code of Conduct*

11. The Panel has considered one formal complaint in this reporting period, 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 this complaint.

13. Should a Member be found 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.

<b>Matter No.</b>	<b>Source of Complaint</b>	<b>Alleged breaches of the Code</b>	<b>Outcome/Status</b>
03 - 24	Officers v Member	<i>Failing to act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias; failing to actively promote and robustly support the Nolan principles and be willing to challenge poor behaviour wherever it occurs; failing to value your colleagues and</i>	<i>An initial request for anonymity was rejected by the Assessment Panel due to a lack of exceptional circumstances. A number of named officers then came forward. The Assessment Panel</i>

		<p><i>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; bringing your office or authority into disrepute; failing to An initial request for anonymity was rejected by the Assessment Panel due to a lack of exceptional circumstances. A number of named officers then came forward. The Assessment Panel subsequently determined that, whilst the complaint was admissible, no further action should be taken given that the Subject Member had apologised. 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></p>	<p><i>subsequently determined that, whilst the complaint was admissible, no further action should be taken given that the Subject Member had apologised.</i></p>
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## Conclusion

15. Over the almost four-year period that the Panel has been active, a number of matters have been considered and refined as part of the formal Complaints Procedure now in operation, the latest of which have been presented in this report.
16. Compared to the previous year's report, the Panel have had fewer matters to consider (although the previous report covered a longer period of time). This may be connected to a successful deployment of the informal resolution mechanisms (with external mediation if agreeable by all parties) that are expressly included in the Complaints Procedure. There is also now a requirement that Member-on-Member complainants first explore a resolution with either the Chief Commoner, or the Chair of General Purposes Committee of Aldermen or the Chair of Nominations Committee of Aldermen, at an early stage.
17. The Panel's continued aim is for the complaints procedure they operate to be effective and efficient, accessible and widely understood by both members of the public and members of the Corporation alike.

**Recommendation**

18. We submit this report for information.

**Appendices**

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

All of which we submit to the judgement of this Honourable Court.

DATED this 18<sup>th</sup> day of September 2025.

SIGNED on behalf of the Committee.

**Deputy Christopher Michael Hayward**  
Chairman, Policy and Resources Committee