Committee(s): Member Development & Standards Sub-Committee	**Date:** 11 June 2026
Subject: Proposal for an informal and confidential reporting mechanism for Member Behaviour	**Public report:** For Decision
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **provides business enabling functions**	• Diverse Engaged Communities • Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	No
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:	Deputy Town Clerk
Report author:	Isaac Thomas

Summary

This report proposes the introduction of an informal and confidential reporting mechanism to enable concerns regarding lower-level Member behavioural issues to be raised and addressed appropriately outside of the formal Code of Conduct process.

It is recognised that certain behaviours may not meet the threshold for formal standards complaints or disciplinary action, but may nevertheless warrant intervention or informal resolution. It is also recognised that Members may, in some cases, feel uncomfortable raising concerns formally due to sensitivities, professional relationships, or concerns about confidentiality.

The mechanism proposed in this report would provide a simple reporting function via the Members' Portal through which concerns could be submitted confidentially and, where appropriate, anonymously, to the Chief Commoner, Deputy and Assistant Town Clerks. The intention is that concerns could then be addressed informally through discussion, advice, or other proportionate interventions, rather than through formal investigation procedures. This would be explicitly distinct from the existing Code of Conduct regime and the management of complaints through that process.

The proposal is intended to support a respectful and professional Member culture whilst encouraging early intervention and informal resolution where appropriate.

If approved, it is also recommended that Officers be permitted to report informal complaints via the same platform. If this would help address an outstanding action arising from the Local Government Association's Review into Member Behaviour from November 2023, namely: the introduction of a reporting framework to manage informal complaints from officers against Members.

Recommendation(s)

Members are asked to:

1. Approve, in principle, the development of an informal and confidential reporting mechanism for lower-level Member behavioural concerns lodged by both officers and Members.
2. Delegate authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman of the Member Development and Standards Sub-Committee, to develop detailed proposals for future consideration by the Sub-Committee.

Main Report

Background

1. The City of London Corporation maintains formal standards and conduct arrangements through the Member Code of Conduct and associated complaints procedures.

2. While these arrangements provide a mechanism for addressing serious or formal complaints, it has been recognised that there may be occasions where behaviours fall below expected standards but do not necessarily meet the threshold for invoking formal Code of Conduct procedures.

3. Several Members have indicated that there could be occasions where they may be reluctant to raise such concerns formally, either because of the nature of the behaviour not meeting the relevant threshold, or due to the perceived seriousness of those processes and the associated administrative burden, particularly where matters involve colleagues, personal relationships, or situations that may be regarded as sensitive or embarrassing.

4. Informal discussion has, therefore, taken place regarding the potential introduction of a confidential reporting mechanism that would allow lower-level concerns to be raised and addressed proportionately and informally, where appropriate. This could provide a constructive opportunity to address low-level behaviours at an early stage.

5. This aligns with some of the findings from the LGA Peer Review, as well as the previous LGA Member Behavior Review from November 2023, and will support the strengthening of positive culture and behaviours.

Current Position

6. At present, there is no dedicated consistent mechanism for Members or officers to confidentially raise lower-level behavioural concerns outside of the formal complaints process, beyond personal approaches to the Chief Commoner (or, in the case of officers, their manager and/or the Assistant and Deputy Town Clerk). A number of Members have reflected that the ability to speak to the Chief confidentially can be challenging logistically, given varying commitments and availibility, and as such the "moment" can pass before they have the ability to highlight something to support a timely intervention. This is also experienced by officers. As a result, concerns which may benefit from early intervention or informal resolution may go unreported or unresolved, potentially leading to repeated incidences or low-level behaviours going unchallenged and growing into more serious behaviours.

7. The proposed mechanism would seek to address this gap by introducing a simple reporting function through the Members' Portal. Reports would then be directed confidentially to the Chief Commoner (or past Chief Commoner) by the Assistant or Deputy Town Clerk, who could then determine whether informal engagement or intervention would be appropriate. Where officers are involved, we may engage with the relevant Chief Officer and/or senior director.

Options

8. The following options have been identified:

<u>Option 1: Maintain Current Arrangements</u>

No additional reporting mechanism would be introduced. Members would continue to rely solely on the existing formal procedures. This option would avoid additional administrative requirements but would not address the identified gap relating to lower-level behavioural concerns.

<u>Option 2: Introduce an informal confidential reporting mechanism (Recommended)</u>

A confidential reporting function would be established via the Members' Portal, enabling Members and Officers to escalate lower-level behavioural concerns directly with the Chief Commoner.

This option would support early intervention, informal resolution, and the promotion of positive Member conduct and culture.

Proposals

9. It is proposed that Members endorse the development a proportionate and carefully governed confidential reporting mechanism through the Members' Portal.

10. The mechanism would be intended solely for lower-level behavioural concerns that do not warrant formal Code of Conduct proceedings but which may benefit from informal intervention or resolution.

11. The proposal is not intended to replace or undermine existing formal complaints processes, nor form part of that process. Serious allegations or matters engaging the Code of Conduct would continue to be addressed through the established route.

12. Appropriate governance arrangements would be put in place so that reports submitted through the mechanism would be directed confidentially to the Chief Commoner, supported by the Deputy Town Clerk and Assistant Town Clerk (as is current longstanding practice). Provision would also be made for alternative reporting route (such as to a past Chief Commoner, or a relevant Officer) in the event that the nature of the issue is such that the individual would rather not engage the Chief Commoner of the day. Officers would develop appropriate safeguards and data protection arrangements to ensure that they system operates fairly.

13. Anonymised, aggregated data on the number of submissions received through the mechanism could be reported periodically to MDSSC, if this is considered to be of value.

Key Data

14. No formal data currently exists regarding the volume of lower-level behavioural concerns that are not progressed through formal complaints procedures.

15. Informal Member feedback has suggested that some Members may currently be reluctant to raise concerns through the established mechanisms where issues are regarded as sensitive, minor, or interpersonal in nature.

Corporate & Strategic Implications

- **Strategic implications -** The proposal supports the Corporate Plan 2024–2029 objective of fostering Diverse Engaged Communities by promoting respectful behaviours, positive - working relationships, and an inclusive organisational culture. The proposal also supports the objective of Providing Excellent Services by strengthening governance arrangements.
- **Financial implications –** There are no financial implications.
- **Resource implications –** There may be minor officer resource implications within the Governance & Member Services team associated with administration and oversight of the mechanism.
- **Legal implications –** There are no legal implications to this decision.
- **Risk implications –** Risks would be mitigated through clear governance arrangements and oversight.

- **Equalities implications** – The proposal is intended to have a positive impact on equaslities as it would support and inclusive and respectful Member environment.
- **Climate implications –** There are no climate implications.
- **Security implications –** Appropriate digital and information securities would be considered throughout development.

Conclusion

16. This report proposes the development of an informal and confidential reporting mechanism to address lower-level Member behavioural concerns outside of formal Code of Conduct processes. The proposal would seek to encourage early intervention and support a positive Member/Member and Member/Officer culture.

17. Members are invited the approve the recommendations set out in the report.

Isaac Thomas
Town Clerk's Department
T: 020 3834 7532
E: Isaac.Thomas@cityoflondon.gov.uk