City of London Corporation Committee Report

Committee(s): Member Development & Standards Sub Committee	**Date:** 15 October 2026
Subject: Annual Report of the Panel of Independent Persons	**Public report:** For Decision
This proposal: • **delivers Corporate Plan 2024-29 outcomes**	All
Does this proposal require extra revenue and/or capital spending?	Yes
If so, how much?	c.£15,000
What is the source of Funding?	To be agreed with Chamberlain's Department should MDSSC be supportive
Has this Funding Source been agreed with the Chamberlain's Department?	See above
Report of:	Town Clerk
Report author:	Kate Doidge, Town Clerk's Department

Summary

This annual 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 June 2025. This report has been placed by the Town Clerk's office in the usual format, in order to facilitate submission to the Member Development and Standards Sub-Committee and the Policy and Resources Committee ahead of its presentation 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.

This report also contains details of the Panel's recent recruitment activity and a proposal on the terms of office of the Independent Persons. Further, with the costs associated with the ongoing administration of the process having been calculated, an associated request to Members for an allocated budget for Standards-related activities is also incorporated.

Recommendation(s)

Members of the Member Development & Standards Sub-Committee are asked to:

1. Note the activity undertaken by the Panel of Independent Persons since June 2025.
2. Consider the request to amend the terms of office of Independent Persons to two terms of four years, with a maximum of two terms being served (applicable from the 2026 recruitment cohort onwards), and make recommendations to Policy & Resources Committee thereon.
3. Consider the proposal to extend the terms of Independent Persons Amanda Orchard, Rahul Sinha, Amina Hossain, and Karen McArthur, as set out in paragraphs 11 – 24 of the report, and make recommendations to Policy & Resources Committee thereon.
4. Consider the request for an allocated budget for Standards-related activities (c.£15,000), as set out in paragraphs 25 - 33, and make recommendations to Policy & Resources Committee thereon.

Main Report

Background

1. The Panel of Independent Persons (The Panel) was initially established by the City of London Corporation (the City 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 consisting 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 the Court in October 2022.

4. Following a successful recruitment round, four new Independent Persons were appointed to the Panel in March 2026, and the Panel now sits at its full complement of twelve Independent Persons. The Panel have recognised the need for a healthy turnover, also noting that the recruitment activity was a resource-intensive process. At present, there are six Independent Persons who are due to complete their term limits in 2028, with an additional two in 2029.

Thus, the Panel have proposed an extension of up to two years for four of its current members, in order to better manage recruitment and to ensure that it retains the knowledge and expertise of its current membership, supporting those newly appointed members. This proposal is further discussed at paragraphs 11 – 24.

5. Related, the Panel request to amend its terms of reference, so that all appointments are for terms of four years, with a maximum of two terms being served. This is a maximum of eight years. This is discussed at paragraphs 11 - 16.

6. This report also contains a request for an allocated budget for Standards-related activities going forward. At present, there is no allocated budget, notwithstanding the legal obligation on the City Corporation to have in place and maintain a standards regime and the unavoidable costs associated therewith. In recent years, costs have been met by underspends or vacancy factors within the Deputy Town Clerk's budget in-year; the increasing costs mean that this is no longer sustainable, nor is it prudent budget management. This request is further discussed at paragraphs 25 – 33.

7. 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 June 2025 to September 2026.

Current Position

Operation of the Panel

8. 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. Robert Coyle has served as Chair since June 2025, with Tom Ketteley serving as Deputy Chair during this same period.

9. In terms of its own governance, the full Panel has met nine times since it was established and each of these meetings have been quorate within the terms of reference set, with agendas for these meetings approved by the Chair. These are distinct from those required for the Panel to formal consider complaints (i.e., Assessment, Hearing and Appeal Sub-Panels). At these meetings, the Panel regularly review its Terms of Reference to ensure that they remain fit for purpose. The Panel also take the opportunity to share best practice and undertake training relevant to their roles at full meetings. The Panel regularly review the Complaints Procedure as matters arise from time to time via its operation, such as if circumstances may be encountered which had not been envisaged at the time the Complaints Procedure was drafted. In these circumstances, where appropriate, the Panel uses these meetings to consider whether amendments are required and if so, make recommendations to the City Corporation. The Panel currently arranges an annual meeting, with any further meetings arranged to suit organisational requirements. The most recent meeting was held in September 2026.

10. 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 be 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.

Independent Person Terms of Office

11. The Panel had previously agreed that Independent Persons should 'rotate off' to allow for new recruitment. At the end of 2025, two Independent Persons retired from the Panel, and that, together with two pre-existing vacancies, meant that four new Independent Persons were recruited and appointed in 2026.

12. It became clear that the recruitment activity was a resource-intensive process, taking much longer than originally planned given the diaries involved and the number of applications on this occasion – commencing in summer 2025, with the appointment by Court of Common Council unable to take place until March 2026. The feedback from the Recruitment Panel was it would not recommend annual recruitment exercises given the amount of time required and difficulties with aligning diaries to allow time for shortlisting and interviews.

13. Whilst there is no desire to cease the 'rotate off' position, the Panel are keen to put in place term expiry dates to allow time to properly plan recruitment and allow for a year in-between recruitment exercises given current resource capacity.

14. The terms of reference of the Panel state that all appointments are for terms of up to two years, with a maximum of three terms being served. The Panel request to amend the terms of reference, so that now all appointments are for terms of four years, with a maximum of two terms being served. This is a maximum of eight years. This change is to increase the time in-between recruitment activity, allow for a longer training period (particularly if any Panel member should wish to also serve as Chair or Deputy Chair), and the sharing of knowledge and experience between newer and older Independent Persons. It also mirrors the governance arrangements previously in place for Independent Persons appointed by the then Standards Committee.

15. A tracked changes version of the terms of reference can be found at Appendix 2.

16. Members are therefore asked to consider whether is wishes to amend the terms of office for Independent Persons, as described above.

17. It is proposed that the above change only apply from the Independent Persons who were appointed in 2026 onwards. This means that their second term of office would end in 2034.

18. The Court of Common Council resolved, in October 2022, to extend the term of the Independent Persons sat on the Panel at the time by one year to allow them to begin to oversee the operation of the Complaints Process that they had

worked up and to allow them to have adequate time to reflect upon and share any lessons learned.

19. At present, there are therefore six existing Independent Persons who are shortly due to complete their six-year (plus one-year extension) limit in 2028:
    - Miranda Carruthers-Watt
    - Robert Coyle
    - Tom Ketteley
    - Amanda Orchard
    - Rahul Sinha
    - Atiyyah Younis

20. Should all the above Independent Persons retire in 2028, this would be a loss of a valuable source of knowledge and experience (50% of the existing Panel in one wave). Further, there are two Independent Persons who are due to retire in 2029:
    - Amina Hossain
    - Karen McArthur

21. Whilst this is a much smaller number than the first cohort, this would still be a loss of valuable sources of knowledge and experience, especially if six new Independent Persons are recruited in only the previous year. Further, if resource remains as is, which is likely, it will require consecutive years of a resource-intensive recruitment process, which may not be the best use of the Corporation's resources.

22. To better manage and stagger the 'rotate off' approach, in line with good governance, the Panel therefore recommends an extension to the terms of some of the above-mentioned Independent Persons. The recommendation is summarised below.

    For those Independent Persons due to end their terms of office in 2028:

    (i) 4 retire from the Panel in 2028, as previously planned. (Robert Coyle[1]; Miranda Carruthers-Watt; Atiyyah Younis and Tom Ketteley)

    (ii) 2 extend their terms by <u>two</u> years, to retire in 2030. (Amanda Orchard, Rahul Sinha)

    For those Independent Persons due to end their terms of office in 2029:

    (iii) 2 (i.e., both) extend by <u>one</u> year, to retire in 2030 (Amina Hossain; Karen McArthur).

    For those Independent Persons due to end their terms of office in 2034:

    (iv) The term limit is proposed to remain in line with the new term limits agreed by the Panel (two terms of four years), with these Independent Persons retiring in 2034 (Alison Abu; Aaqil Ahmed; Patrick Hodson; Christopher Lake).

[1] Note: Robert Coyle has indicated that he shall retire from the Panel at the end of 2026 but is listed here for illustrative purposes. Officers shall consider how to manage this vacancy in the interim, which could include holding the vacancy until the next planned round of recruitment in 2028.

23. To have confirmed dates for Independent Persons retiring from the Panel this far in advance would greatly assist in managing future recruitment activity. It would also assist in enabling the review of the two-year terms described in the terms of reference; so that, should an Independent Person wish to retire earlier than their maximum term limit, this vacancy can be incorporated into the next planned round of recruitment, rather than undertaking a recruitment round on an exceptional basis.

24. Members are asked to consider and discuss firstly whether it agrees to amend the terms of office of an Independent Person to terms of four years, with a maximum of two terms being served (applicable from the 2026 cohort onwards), and second, if it wishes to recommend to the Court of Common Council an extension of terms of Amanda Orchard, Rahul Sinha, Amina Hossain, and Karen McArthur.

Budget

25. At present, there is no allocated budget for Standards-related activities. Costs have historically been met in-year from the Deputy Town Clerk's local risk budget and managed locally by ensuring off-setting savings can be utilised (for example, through underspends or monies available through vacancy factors).

26. However, given the uncontrollable nature of the expenditure (i.e., there is no discretion as to whether or not to process complaints made under the Code in accordance with its provisions, and the fees to the Independent Persons and for legal support are fixed), local risk allocation is neither appropriate, nor is it sustainable as standards activity continues to expand and associated cost pressures grow.

27. Across 2024 to present, cumulative costs for various Standards-related activities were as follows:

    - Independent Person Claims (Day Rate and/or other Expenses) – approx. £10,000
    - External Third-Party Mediation – approx. £5,000
    - External Legal Counsel – approx. £5,500
    - Recruitment Activity Costs – approx. £3,000

28. This is an average cost of approximately £12,000 per year. This is inevitably a snapshot of costs.

29. Further, in September 2025, Policy & Resources Committee agreed an uplift to the day rate of Independent Persons, from £300 to £325. This will have an impact on costs.

30. Whilst it is impossible to accurately predict the number of complaints that will be received each year, it is unlikely that these costs will reduce. The Panel continues to encourage the use of informal resolution mechanisms (where appropriate) which has reduced the number of complaints received through formal processes (resulting in savings in day rate and travel expense claims and legal costs).

However, this requires the consent of both parties. In addition, when external third-party mediation is considered the most appropriate route for both parties, this still has a financial cost that has no allocated budget to meet it.

31. Good governance is for the Panel to have a healthy turnover of membership, with further recruitment activity anticipated in the near future as discussed earlier in this report, there shall be financial costs (such as for adverts, etc.). Again, there is no allocated budget to meet these anticipated costs.

32. Members are therefore requested to consider whether they wish to allocate a specific budget to meet costs relating standards-related activities. Based on average costs, it is suggested that this be c.£15,000 per annum. There are various funding mechanisms to be explored, which shall be discussed with Chamberlain's Department if the principle of an allocated budget for standards-related activities be agreed. If agreed, it is suggested that it be monitored and reported as part of the Annual Report going forward.

33. Members are therefore asked to consider and discuss this request. Subject to the views of this Sub-Committee, the report shall then be updated for submission to Policy & Resources Committee.

Matters considered by the Panel from June 2025 – September 2026.

Dispensations

34. 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.

35. 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

36. The Panel has completed its consideration of five complaints in this reporting period, summarised below. Matters that are currently ongoing will be reported once the Complaints Procedure has concluded.

37. 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.

38. 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.

39. 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[2]***	***Outcome/Status***
01 – 25	*Officer v. Member*	*C1 – respect; C6 – Use of position; and failing to uphold leadership and accountability of the Seven Principles of Public Life.*	*Resolved via Informal Resolution (externally facilitated) on the agreement of both parties.*
01 – 26	*Member v. Member*	*C2 – bullying, harassment and discrimination.*	*Resolved via Informal Resolution (externally facilitated) on the agreement of both parties.*
02 - 26	*Public v. Member*	*C2 – bullying, harassment and discrimination; and failing*	*Complaint was deemed not*

[2] Where the specific provisions of the Code that had allegedly been breached were not specified by the complainant, this table has been populated based on the contents of the complaint. This is simply to indicate themes.

		to uphold integrity and honesty of the Seven Principles of Public Life.	*admissible at Assessment.*
03 – 26	*Public v. Member*	*Failing to uphold objectivity, integrity, accountability, openness, leadership and selflessness of the Seven Principles of Public Life.*	*Assessment ruled no further action be taken.*
04 – 26	*Officer v. Member*	*C2 – bullying, harassment and discrimination; C5 – disrepute.*	*Resolved via Informal Resolution (internally facilitated) on the agreement of both parties.*

40. The Panel therefore completed its consideration of five complaints in this reporting period. One was deemed inadmissible, one was decided to have no further action taken, none were upheld with a sanction, and three were resolved via informal resolution.

41. Informal resolution mechanisms (external or internal mediation if agreeable to all parties) continue to be encouraged through the Complaints Procedure, which includes the strong expectation that Member-on-Member complainants first explore a resolution through 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.

42. Though informal resolution mechanisms are encouraged, if a complaint is considered through the full three-stage process (i.e., Assessment, Hearing and Appeal Sub-Panels), it is still considered necessary for the full Panel to comprise of twelve Independent Persons, in order for adequate panel members to be 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.

43. Members are asked to note this information and recommend it onwards to the Court of Common Council.

Conclusion

44. Over the almost five-year period that the Panel has been active, a number of matters have been considered as part of the formal Complaints Procedure, the latest of which have been presented in this report.

45. 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.

Appendices

- Appendix 1 – Panel Membership and Terms of Appointment
- Appendix 2 – Panel Terms of Reference (Tracked Changes)

Kate Doidge
Town Clerk's Department
E: kate.doidge@cityoflondon.gov.uk

Appendix 1

PANEL MEMBERSHIP AND TERMS OF APPOINTMENT

The current Independent Panel Members are:

Name	Appointment Date	Term Expiry
Alison Abu	Appointed 2026	2034
Aaqil Ahmed	Appointed 2026	2034
Miranda Carruthers-Watt*	Appointed 2021	2028
Robert Coyle*	Chair Appointed 2021	2028
Patrick Hodson	Appointed 2026	2034
Amina Hossain^	Appointed 2023	2030
Tom Ketteley*	Deputy Chair Appointed 2021	2028
Christopher Lake	Appointed 2026	2034
Karen McArthur^	Appointed 2023	2030
Amanda Orchard*^	Appointed 2021	2030
Rahul Sinha*^	Appointed 2021	2030
Atiyyah Younis*	Appointed 2021	2028

** = denotes Independent Persons whose terms of office were agreed to be extended by one year by way of resolution of the Court of Common Council in October 2022*

^ = denotes Independent Person whose term expiry is subject to the agreement of Court of Common Council extending their term of office.

Appendix 2

PANEL OF INDEPENDENT PERSONS

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~~. All appointments are for terms of up to four years, with a maximum of two 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).

September 2026.