

Open

Ethics and Standards Committee

Agenda

6pm
Wednesday, 8 September 2021
Council Chamber
Wyre Forest House
Finepoint Way
Kidderminster



Ethics and Standards Committee

Members of Committee:

Chairman: Councillor A L L'Huillier
Vice-Chairman: Councillor S Griffiths

Councillor B S Dawes
Councillor S Miah

Councillor I Hardiman
Councillor M Rayner

Co-opted Members:

Independent Member
Independent Member
Parish Council Representatives

R Reynolds
Rev J A Cox
Councillors R Drew, D Killingworth and W Mack

Information for Members of the Public:

Part I of the Agenda includes items for discussion in public. You have the right to request to inspect copies of Minutes and reports on this Agenda as well as the background documents used in the preparation of these reports.

Part II of the Agenda (if applicable) deals with items of "Exempt Information" for which it is anticipated that the public may be excluded from the meeting and neither reports nor background papers are open to public inspection.

There are particular circumstances when the Ethics and Standards Committee may exclude the public, which are in addition to those available at meetings of the Council, its Cabinet and Committees etc. These apply when the Ethics and Standards Committee considers the following:

Information relating to a particular chief officer, former chief officer or applicant to become a chief officer of a local probation board within the meaning of the Criminal Justice and Court Services Act 2000.

Information which is subject to any obligation of confidentiality.

Information which relates in any way to matters concerning national security.

Declaration of Interests by Members – interests of members in contracts and other matters

Declarations of Interest are a standard item on every Council and Committee agenda and each Member must provide a full record of their interests in the Public Register.

In addition, alongside the Register of Interest, the Members Code of Conduct ("the Code") requires the Declaration of Interests at meetings. Members have to decide first whether or not they have a disclosable interest in the matter under discussion.

Please see the Members' Code of Conduct as set out in Section 14 of the Council's constitution for full details.

Disclosable Pecuniary Interest (DPI) / Other Disclosable Interest (ODI)

DPI's and ODI's are interests defined in the Code of Conduct that has been adopted by the District.

If you have a DPI (as defined in the Code) in a matter being considered at a meeting of the Council (as defined in the Code), the Council's Standing Orders require you to leave the room where the meeting is held, for the duration of any discussion or voting on that matter.

If you have an ODI (as defined in the Code) you will need to consider whether you need to leave the room during the consideration of the matter.

For further information:

If you have any queries about this Agenda or require any details of background papers, further documents or information, you should contact Louisa Bright, Principal Committee and Member Services Officer, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF. Telephone: 01562 732763 or email louisa.bright@wyreforestdc.gov.uk

Wyre Forest District Council

Ethics and Standards

Wednesday, 8 September 2021

Council Chamber, Wyre Forest House, Finepoint Way, Kidderminster

Part 1

Open to the press and public

Agenda item	Subject	Page Number
1.	Apologies for Absence	
2.	Appointment of Substitute Members To receive the name of any Councillor who is to act as a substitute, together with the name of the Councillor for whom he/she is acting.	
3.	Declarations of Interests by Members In accordance with the Code of Conduct, to invite Members to declare the existence and nature of any Disclosable Pecuniary Interests (DPI's) and / or Other Disclosable Interests (ODI's) in the following agenda items and indicate the action that they will be taking when the item is considered. Please see the Members' Code of Conduct as set out in Section 14 of the Council's Constitution for full details.	
4.	Minutes To confirm as a correct record the Minutes of the meeting held on the 10 September 2020.	6
5.	Report on Conduct Procedures To receive a report from the Solicitor to the Council which provides Councillors with a brief refresher note on the Statutory shape of the Council's Corporate Governance framework and Code of Conduct procedure and the updating of the pan-Worcestershire Code of Conduct following the report of the Committee for Standards in Public Life (CSPL).	9
6.	Complaints to the Local Government and Social Care Ombudsman 2020/21 To receive a report from the Chief Executive on the outcome of complaints to the Local Government and Social Care Ombudsman in accordance with Council Policy for the period of 1 st April 2020 to 31 st March 2021.	12

7.	<p>Options in Case of Finding of Breach of Code of Conduct</p> <p>To receive a briefing note from the Chief Executive and Solicitor to the Council on the range of actions that the Committee might take in cases where there is a breach of the code.</p>	20
8.	<p>To consider any other business, details of which have been communicated to the Solicitor to the Council before the commencement of the meeting, which the Chairman by reason of special circumstances considers to be of so urgent a nature that it cannot wait until the next meeting.</p>	
9.	<p>Exclusion of the Press and Public</p> <p>To consider passing the following resolution:</p> <p>“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting during the consideration of the following item of business on the grounds that it involves the likely disclosure of “exempt information” as defined in the paragraph 1 of Part 1 of Schedule 12A to the Act”.</p>	

Part 2

Not open to the Press and Public

10.	<p>To consider any other business, details of which have been communicated to the Solicitor to the Council before the commencement of the meeting, which the Chairman by reason of special circumstances considers to be of so urgent a nature that it cannot wait until the next meeting.</p>	
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WYRE FOREST DISTRICT COUNCIL
ETHICS AND STANDARDS COMMITTEE
HELD REMOTELY
10 SEPTEMBER 2020 (6PM)

Present:

Councillors: S Miah (Chairman), A L L'Huillier (Vice-Chairman), B S Dawes, N Gale, S Griffiths and I Hardiman.

Independent Person: T J Hipkiss

Co-opted Member: Rev J Cox

Parish Council Representative: Councillor D Killingworth

Observers:

Councillors: J F Byng and P W M Young.

ES.01 Apologies for Absence

Apologies for absence were received from Parish Councillor W Mack.

ES.02 Appointment of Substitutes

No substitutes were appointed.

ES.03 Declarations of Interests by Members

No declarations of interest were made.

ES.04 Minutes

Decision: The minutes of the meeting held on 12th September 2019 be confirmed as a correct record and signed by the Chairman.

ES.05 The Localism Act 2011 – Dispensations

A report was received from the Monitoring Officer which asked the Committee to consider giving Members appropriate dispensations in respect of issues relating to the Council's decision making process.

The Monitoring Officer presented the report. The Committee were advised that the authority was only permitted to give Members dispensations if the Standards Committee agreed; the generic dispensations are presented to the Committee for approval every four years.

The Monitoring Officer outlined each of the proposed generic dispensations and advised that the final general dispensation for members covered partners as well as spouses. She said that the dispensations had worked very well over

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the last nine years since the Localism Act came into force, as it enabled members to participate where otherwise they would be excluded from taking part in debate.

In response to observations made by the Independent Person, the Monitoring Officer confirmed that the first dispensation applied to any parish or town council; it was not limited to the boundaries of the County. She said it was important to maximise participation of Councillors who may have memberships in other areas.

With regard to declaring interests the Monitoring Officer said it was good practice that when Members were declaring their interest not to rely solely on the dispensation, but at the beginning of the meeting declare the relevant interest covered by the dispensation as it gives the Council the openness and transparency it strives for. She added that that when the Localism Act was introduced in 2011, it was made a criminal offence for Members not to declare Disclosable Pecuniary Interests (DPIs), therefore it is the responsibility of individual Members to make sure they check the agenda's and seek advice from the Monitoring Officer or Deputy Monitoring Officer prior to any meeting if there are any items on the agenda which they feel they may have to declare an interest in.

Agreed: Generic dispensations are given to all Members for a period of 4 years in respect of the matters detailed below:

1. Membership of outside bodies

A general dispensation under s33(2) (c) and (e) of the Localism Act 2011 and under the Code of Conduct to allow the full participation in Council, Committee and other meetings where members of the Council or their spouse or partner are members of or employed by one or more of the following bodies, and who because of this would or could be prevented from participating in such meetings unless a decision relates directly to their own (or spouse or partners) financial circumstances:

- (a) Membership of any parish or town council.**
- (b) Membership of Worcestershire County Council.**
- (c) Membership of any other body of a public nature to which the member has been appointed as the Council's nominee or representative.**

2. Addressing committees considering matters in which a member has an interest.

A general dispensation under s33(2)(c) and (e) of the Localism Act 2011 and under the Code of Conduct to allow members who would otherwise be prevented from doing so to address Council and committees in the same way as a member of the public may

[NB Such a member must still then withdraw from the meeting once they

have addressed it.]

- 3. A general dispensation for members whose spouse or partner are employed by a body of a public nature, unless a decision relates directly to their own financial circumstances.**

There being no further business, the meeting ended at 6.16pm.

**WYRE FOREST DISTRICT COUNCIL
ETHICS AND STANDARDS COMMITTEE**

8 SEPTEMBER 2021

Report on Conduct Procedures

OPEN	
RESPONSIBLE OFFICER:	Solicitor to the Council
CONTACT OFFICER:	Caroline Newlands caroline.newlands@wyreforestdc.gov.uk
APPENDICES	None

1. PURPOSE OF REPORT

- 1.1 To provide Councillors with a brief refresher note on the Statutory shape of the Council's Corporate Governance framework and Code of Conduct procedure and the updating of the pan-Worcestershire Code of Conduct following the report of the Committee for Standards in Public Life (CSPL).

2. RECOMMENDATION

- 2.1 **The committee note the advice/triage process for potential complaints/conduct matters.**
- 2.2 **The Committee note the current discussions for updating the pan-Worcestershire Code of Conduct following previous discussions at this Committee.**

3. BACKGROUND

Potential complaints/concerns/ enquiries

- 3.1 Any member of the public, Statutory body, Parish, Town or District Councillor, MP, Clerk, Council Officer, Auditor or Police are entitled to contact the Monitoring Officer (MO) in confidence in respect of any matter pertaining to the Council's Corporate Governance.
- 3.2 Contact can be in connection with specific matters, generic advice, concerns about behaviour, potential or perceived conduct matters or criminal matters.
- 3.3 Part of the MO role is to give advice on options (informal and formal) and seek to educate/constructively resolve matters, rather than escalate and exacerbate matters by way of formal, adversarial proceedings.
- 3.4 If a problem/ unhappiness or other issue that a third party has with Members can be legitimately resolved informally, there is less chance of things getting worse and unnecessarily escalating a matter.

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- 3.5 This confidential triage gives the opportunity for parties to be candid without an immediate escalation of an issue, which can cause stress for both the potential complainant and the councillor and damage any chance of resolution/improvement.
- 3.6 If a complainant feels that they would like to formalise an issue, the MO will, under the triage procedure, immediately share details with the Independent Person (after obtaining the consent of the complainant).
- 3.7 Wyre Forest has access to 5 Independent persons within Worcestershire and the MO can chose to refer a matter to any one of these.
- 3.8 Members will recall a review of the Code of Conduct used by Worcestershire Councils was undertaken by Monitoring Officers and Councils' Standards Committees, as a consequence of the report of the Committee on Standards in Public Life (CSPL) in 2019. The CSPL best practice recommendations for local authorities are considered a benchmark of good ethical practice.
- 3.9 The revised code was considered by the Ethics and Standards Committee on 12th September 2019 and was adopted by Council in February 2020.
- 3.10 In December 2020 the Local Government Association published a model Code of Conduct as part of its work in supporting the sector to continue to aspire to high standards of leadership and performance and offered a template for councils to adopt as a whole and/or with local amendments. The changes reflect the revisions previously considered by the Ethics and Standards Committee and accordingly a pan-Worcestershire Code of Conduct is currently being updated.

4. **CONCLUSION**

- 4.1 Confidential reporting and contact procedures enable Parish, Town and District Councillors members, MP, clerks, officers, members of the public, the police and Auditors, to contact and discuss/receive advice from the MO in confidence.
- 4.2 Contact can be in connection with specific matters, generic advice, concerns about behaviour, potential or perceived conduct matters. Where appropriate, formal procedures are available to escalate a matter either to the Independent Member or the Standards committee. All forms are freely available and accessible on the website for all who wish to escalate a matter formally.
- 4.3 Working jointly with MOs within Worcestershire simplifies the Ethical framework for Councillors who are Members of more than one Council in Worcestershire

5. **BACKGROUND PAPERS**

- 5.1 Formal process – Complaints against councillors – local code of conduct

<https://www.wyreforestdc.gov.uk/your-council/councillors-committees-andmeetings/complaints-against-councillors/>

5.2 Current Code of Conduct

<https://www.wyreforestdc.gov.uk/your-council/councillors-committees-and-meetings/constitution/section-14-code-of-conduct/>

5.3 Member Code of Conduct published by the LGA

<https://www.local.gov.uk/sites/default/files/documents/LGA%20Model%20Member%20Code%20of%20Conduct.pdf>

5.4 Committee on Standards in Public Life (CSPL) Local Government Ethical Standards report

<https://www.gov.uk/government/publications/local-government-ethical-standards-report>

WYRE FOREST DISTRICT COUNCIL
ETHICS AND STANDARDS COMMITTEE
8 September 2021

Complaints to the Local Government and Social Care Ombudsman 2020/21

OPEN	
RESPONSIBLE OFFICER:	Chief Executive
CONTACT OFFICER:	Ian Miller, Ext. 2700 Ian.Miller@wyreforestdc.gov.uk
APPENDICES:	Appendix A - Definition of decision terms Appendix B - Local Government & Social Care Ombudsman Annual Review Letter 2021 Appendix C - Table showing Comparison of no. of complaints decided by Local Government Ombudsman for District Councils in Worcestershire

1. PURPOSE OF THE REPORT

- 1.1 To report the outcome of complaints to the Local Government and Social Care Ombudsman in accordance with Council Policy for the period of 1st April 2020 to 31st March 2021.

2. RECOMMENDATION

The Committee is asked to DECIDE that:

- 2.1 **This report is to be noted.**

3. BACKGROUND

- 3.1 The Council's Corporate Complaints Procedure provides a two-stage approach for handling of customer complaints. If resolution through this process is not possible, the complainant can contact the independent Local Government and Social Care Ombudsman.
- 3.2 The Ombudsman's role is to consider whether 'injustice' has been caused by shortcomings in the administrative actions of the Council. He examines what the Council has done compared with its legal obligations, the requirements of its own policies and procedures and of good administrative practice.

3.3 Members of the public may contact the Ombudsman directly. However complainants who do so are always encouraged to resolve a grievance at a local level.

4. KEY ISSUES

Analysis of Complaints decided by the Ombudsman

4.1 The table below summarises the results of the Ombudsman's investigations into complaints decided in 2020/21 for Wyre Forest District Council. Of the four complaints referred to the Ombudsman, 1 was closed as there was insufficient evidence to proceed, 1 was referred to WFDC for a local resolution and 1 had recommendations attached which WFDC complied with. The fourth complaint was received within the period considered by this report, however the outcome will be included in the published figures for the year ending 31 March 2022 (for prior information it will be recorded as: Upheld: Maladministration, no injustice).

Local Authority	Detailed Investigations			Incomplete / Invalid	Referred back for local resolution	Compliance outcome	Reported in March 2022 figures	Total
	Upheld	Not Upheld	Uphold Rate					
Wyre Forest DC	0	0	0%	1	1	1	1	4

4.2 Explanations for the terms used to describe the different types of Ombudsman decision can be found in Appendix A and the Local Government & Social Care Ombudsman Annual Review Letter 2021 can be found in Appendix B.

4.3 Appendix C provides a comparison with other district councils in Worcestershire. It will be seen that Wyre Forest compares favourably with the other areas of the County being one of only two areas that did not require any detailed investigations and only 1 compliance outcome, which fully complied with the recommendations of the Ombudsman.

5 FINANCIAL IMPLICATIONS

5.1 None.

6. LEGAL AND POLICY IMPLICATIONS

6.1 Section 5 & Section 5A of Local Government and Housing Act 1989 create a responsibility for the Monitoring Officer to report where there is a finding of maladministration (which now includes where there is a local settlement).

7. **RISK MANAGEMENT**

7.1 None.

8 **CONSULTEES**

8.1 Corporate Leadership Team.

8.2 Councillor Helen Dyke, Leader of the Council and Cabinet Member for Economic Regeneration, Planning and Localism.

9. **BACKGROUND PAPERS**

9.1 None.

Definition of Decision Terms by the Local Government Ombudsman

- **Upheld:** These are complaints where we have decided that an authority has been at fault in how it acted and that this fault may or may not have caused an injustice to the complainant, or where an authority has accepted that it needs to remedy the complaint before we make a finding on fault. If we have decided there was fault and it caused an injustice to the complainant, usually we will have recommended the authority take some action to address it.

- **Not upheld:** Where we have investigated a complaint and decided that a council has not acted with fault, we classify these complaints as not upheld.

- **Advice given:** These are cases where we give advice about why LGO would not look at a complaint because the body complained about was not within the LGO's scope or we had previously looked at the same complaint from the complainant, or another complaints handling organisation or advice agency was best placed to help them.

- **Closed after initial enquiries:** These complaints are where we have made an early decision that we could not or should not investigate the complaint, usually because the complaint is outside LGO's jurisdiction and we either cannot lawfully investigate it or we decide that it would not be appropriate in the circumstances of the case to do so. Our early assessment of a complaint may also show there was little injustice to a complainant that would need an LGO investigation of the matter, or that an investigation could not achieve anything, either because the evidence we see shows at an early stage there was no fault, or the outcome a complainant wants is not one we could achieve, for example overturning a court order.

- **Incomplete/invalid:** These are complaints where the complainant has not provided us with enough information to be able to decide what should happen with their complaint, or where the complainant tells us at a very early stage that they no longer wish to pursue their complaint.

- **Referred back for local resolution:** We work on the principle that it is always best for complaints to be resolved by the service provider wherever possible. Furthermore, the Local Government Act 1974 requires LGO to give authorities an opportunity to try and resolve a complaint before we will get involved. Usually we tell complainants how to complain to an authority and ask them to contact it directly. In many instances, authorities are successful in resolving the complaint and the complainant does not recontact us.

Local Government &
Social Care
OMBUDSMAN

21 July 2021

By email

Mr Miller
Chief Executive
Wyre Forest District Council

Dear Mr Miller

Annual Review letter 2021

I write to you with our annual summary of statistics on the decisions made by the Local Government and Social Care Ombudsman about your authority for the year ending 31 March 2021. At the end of a challenging year, we maintain that good public administration is more important than ever and I hope this feedback provides you with both the opportunity to reflect on your Council's performance and plan for the future.

You will be aware that, at the end of March 2020 we took the unprecedented step of temporarily stopping our casework, in the wider public interest, to allow authorities to concentrate efforts on vital frontline services during the first wave of the Covid-19 outbreak. We restarted casework in late June 2020, after a three month pause.

We listened to your feedback and decided it was unnecessary to pause our casework again during further waves of the pandemic. Instead, we have encouraged authorities to talk to us on an individual basis about difficulties responding to any stage of an investigation, including implementing our recommendations. We continue this approach and urge you to maintain clear communication with us.

Complaint statistics

This year, we continue to focus on the outcomes of complaints and what can be learned from them. We want to provide you with the most insightful information we can and have focused statistics on three key areas:

Complaints upheld - We uphold complaints when we find some form of fault in an authority's actions, including where the authority accepted fault before we investigated.

Compliance with recommendations - We recommend ways for authorities to put things right when faults have caused injustice and monitor their compliance with our recommendations. Failure to comply is rare and a compliance rate below 100% is a cause for concern.

Satisfactory remedy provided by the authority - In these cases, the authority upheld the complaint and we agreed with how it offered to put things right. We encourage the early resolution of complaints and credit authorities that accept fault and find appropriate ways to put things right.

Finally, we compare the three key annual statistics for your authority with similar types of authorities to work out an average level of performance. We do this for County Councils, District Councils, Metropolitan Boroughs, Unitary Councils, and London Boroughs.

Your annual data will be uploaded to our interactive map, [Your council's performance](#), along with a copy of this letter on 28 July 2021. This useful tool places all our data and information about councils in one place. You can find the decisions we have made about your Council, public reports we have issued, and the service improvements your Council has agreed to make as a result of our investigations, as well as previous annual review letters.

I would encourage you to share the resource with colleagues and elected members; the information can provide valuable insights into service areas, early warning signs of problems and is a key source of information for governance, audit, risk and scrutiny functions.

As you would expect, data has been impacted by the pause to casework in the first quarter of the year. This should be considered when making comparisons with previous year's data.

Supporting complaint and service improvement

I am increasingly concerned about the evidence I see of the erosion of effective complaint functions in local authorities. While no doubt the result of considerable and prolonged budget and demand pressures, the Covid-19 pandemic appears to have amplified the problems and my concerns. With much greater frequency, we find poor local complaint handling practices when investigating substantive service issues and see evidence of reductions in the overall capacity, status and visibility of local redress systems.

With this context in mind, we are developing a new programme of work that will utilise complaints to drive improvements in both local complaint systems and services. We want to use the rich evidence of our casework to better identify authorities that need support to improve their complaint handling and target specific support to them. We are at the start of this ambitious work and there will be opportunities for local authorities to shape it over the coming months and years.

An already established tool we have for supporting improvements in local complaint handling is our successful training programme. During the year, we successfully adapted our face-to-face courses for online delivery. We provided 79 online workshops during the year, reaching more than 1,100 people. To find out more visit www.lgo.org.uk/training.

Yours sincerely,

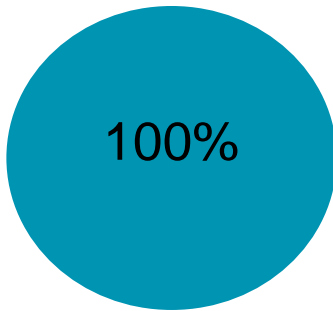


Michael King
Local Government and Social Care Ombudsman
Chair, Commission for Local Administration in England

Complaints upheld

The Ombudsman carried out no detailed investigations during this period

Compliance with Ombudsman recommendations



In **100%** of cases we were satisfied the authority had successfully implemented our recommendations.

Statistics are based on a total of 1 compliance outcome for the period between 1 April 2020 to 31 March 2021

This compares to an average of **100%** in similar authorities.

- Failure to comply with our recommendations is rare. An authority with a compliance rate below 100% should scrutinise those complaints where it failed to comply and identify any learning.

Satisfactory remedy provided by the authority

The Ombudsman did not uphold any detailed investigations during this period

NOTE: To allow authorities to respond to the Covid-19 pandemic, we did not accept new complaints and stopped investigating existing cases between March and June 2020. This reduced the number of complaints we received and decided in the 20-21 year. Please consider this when comparing data from previous years.

Complaints & enquiries decided (by outcome) 2020-2021

**Table Showing the Comparison No. Of Complaints
Decided by Local Government Ombudsman for District Councils in Worcestershire**

Authority	Number of detailed investigations	Complaints upheld	% of Investigated complaints upheld	Number of compliance outcomes for period	% of cases Authority complied with recommendations	Satisfactory remedy provided by the Authority before the complaint reached the Ombudsman	% of upheld cases that the Authority had provided a satisfactory remedy before the complaint reached the Ombudsman
Bromsgrove District Council	3	1	33%	0	N/A	0	N/A
Malvern Hills District Council	2	1	50%	0	N/A	1	100%
Redditch Borough Council	0	0	N/A	0	N/A	0	N/A
Worcester City Council	2	2	100%	3	100%	0	N/A
Wychavon District Council	1	1	100%	1	100%	0	N/A
Wyre Forest District Council	0	0	N/A	1	100%	0	N/A

**Briefing note for members of the Ethics and Standards Committee
8 September 2021**

OPTIONS IN CASE OF FINDING OF BREACH OF CODE OF CONDUCT

1. This briefing note considers the range of actions that the Committee might take in cases where there is a breach of the code.
2. The Localism Act 2011 removed the “teeth” from the standards regime, under which a standards committee could suspend a member for up to 6 months and the Adjudication Panel for England could disqualify members for up to five years.
3. The long-standing rules on disqualification under section 80 of the Local Government Act 1972 continue to apply but are generally relevant only in criminal cases where someone is convicted and imprisoned ‘for a period of not less than three months without the option of a fine’. Parliament has legislated for a recall system for Members of Parliament, where a petition supported by a certain percentage of local electors can, in specified circumstances, lead to a by-election being held. There is no equivalent provision in local government.
4. Thus the main tools at the disposal of the Committee are “naming and shaming”, by holding a meeting in public at which a report about a member’s conduct is considered. The Committee can take such steps as resolving to censure the member and to call on the member to apologise and/or to undertake other steps, such as relevant training.
5. To compensate for the inadequate Standards regime remedies, there a possible further tool, that might be considered in suitably serious cases where “naming and shaming” is not felt to be sufficient. Under section 102 of the Local Government Act 1972, a council may appoint committees and has the ability to fix the number of members of a committee and their term of office. This must involve the ability for a council to appoint the members of a committee and, equally, to change the members of a committee.
6. The Ethics and Standards Committee could consider recommending to full Council that it resolves that a member should not serve as a member or substitute member of a specific committee or all committees for a specified period, such as three or six months. If full Council agreed to such a resolution, the effect would be to deny the member concerned the right to vote in a particular committee or all committees, as only full members or substitute members have such a right. The “breadth” and “depth” of any such recommendation from the Committee would have to depend on the nature and severity of the breaches of the code, and other factors such as whether the member concerned had been found to have breached the code in the past.

**Ian Miller, Chief Executive
Caroline Newlands, Solicitor to the Council
August 2021**