

Committee Agenda

Title:

Standards Committee

Meeting Date:

Thursday 15th September, 2022

Time:

6.30 pm

Venue:

Room 18.12, 18th Floor, 64 Victoria Street, London, SW1E 6QP

Members:

Councillors:

Patricia McAllister (Chair) Melvyn Caplan Md Shamsed Chowdhury Sara Hassan Louise Hyams

Members of the public are welcome to attend the meeting and listen to the discussion Part 1 of the Agenda.



Admission to the public gallery is by ticket, issued from the ground floor reception from 6.00pm. If you have a disability and require any special assistance please contact the Committee Officer (details listed below) in advance of the meeting.

If you require any further information, please contact the Committee Officer, Tristan Fieldsend, Senior Committee and Councillor Co-ordinator.

Email: tfieldsend@westminster.gov.uk; Tel: 07812 760 335

Corporate Website: www.westminster.gov.uk

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions they should contact the the Director of Law in advance of the meeting please.

AGENDA

PART 1 (IN PUBLIC)

1. MEMBERSHIP

To note any changes to the membership.

2. DECLARATIONS OF INTEREST

To receive declarations by Members and Officers of the existence and nature of any pecuniary interests or any other significant interest in matters on this agenda.

3. MINUTES (Pages 3 - 6)

To approve the minutes of the meeting held on 7 April 2022 as a correct record of proceedings.

4. REVIEW OF THE MEMBER/OFFICER PROTOCOL (Pages 7 - 20)

Report of the Director of Law.

5. WORK PROGRAMME (Pages 21 - 26)

Stuart Love Chief Executive 7 September 2022



MINUTES

Standards Committee

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **Standards Committee** held on **Thursday 7th April, 2022**, Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP.

Members Present: Councillors Judith Warner (Chairman), David Boothroyd, Ian Adams, Louise Hyams and Patricia McAllister

Also Present: Asif Iqbal and Elizabeth Walters (Independent Persons)

Apologies for Absence: Councillor Richard Beddoe and Shajad Hussain (Independent Person)

1 MEMBERSHIP

1.1 It was noted that there were no changes to the membership.

2 DECLARATIONS OF INTEREST

2.1 There were none.

3 MINUTES

3.1 **RESOLVED:** That the minutes of the meeting held on 4 November 2021 be signed by the Chair as a correct record of the proceedings

4 REVIEW OF THE MEMBER OFFICER PROTOCOL

4.1 Hazel Best, Interim Monitoring Officer, provided an update on the work undertaken so far with regard to the review of the Member/Officer Protocol. It was noted that proposals included ensuring the code of conduct training provided to Members included the Protocol on Member and Officer relations and for all senior officers and new staff to receive briefings on how to work with Members. The Committee was also interested to note that the Interim Monitoring Officer and the Head of Governance and Councillor Liaison had attended a number of departmental officer meetings to obtain feedback on the

current protocol and to request feedback on how this could be updated/ amended. In addition, views of Members via the party whips had been made and this would be followed up after the local elections. The views of Members would also be sought at the code of conduct training which would take place shortly after the local election. A draft revised Protocol on Member and Officer relations would be presented to the Standards Committee on 7 July 2022.

4.2 The Committee agreed the timing of the review was appropriate with the local elections due to take place in May. The Committee then discussed how the updated Protocol could make specific reference to Members ward work and in particular issues that covered more than one ward. The importance of the Protocol was stressed, and Members suggested that, once finalised, the updated Protocol be published prominently on the Council website.

4.3 **RESOLVED:**

That the update on the review of the Protocol on Member/Officer relations be noted.

5 BI-ANNUAL STANDARDS COMMITTEE REPORT

- 5.1 The Senior Committee and Councillor Co-ordinator introduced the item stating that it was considered best practice for the Council to receive an annual or biennial report in relation to standards.
- 5.2 The Committee considered and commented on the draft report which covered the Committee's work between March 2020 and March 2022. Members were advised that the provision of such a report emphasised the importance the Council placed on the profile of ethical standards across the organisation and afforded the opportunity to highlight key achievements and areas of good practice whilst identifying any requirements for improvement.
- 5.3 The Committee welcomed the report but suggested that the name of the report be amended to the Biennial Standards Committee Report. The report was considered comprehensive and highlighted the extensive and wideranging work the Committee and independent persons had undertaken over the period. The Committee wished to place on thanks the work of the Chair, Councillor Judith Warner, who was attending her last Standards Committee meeting, for all her hard work and efforts in ensuring high standards of conduct by Members and Co-opted Members of the authority were promoted and maintained.

5.5 **RESOLVED:**

That subject to the recommended changes being incorporated the report be approved and recommended to Full Council for noting.

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- 6.1 The Committee noted the 2022-23 Work Programme and was asked to consider any items they would like to come to future meetings.
- 6.2 Following discussions the Committee agreed to include an item on the Annual Review of the Code of Conduct.

RESOLVED: That an Annual Code of Conduct Review be included on the 2022-23 Work Programme.

The Meeting ended at 6.57pm.		
CHAIRMAN:	DATE	





City of Westminster Standards Committee

Meeting or Decision Maker: Standards Committee

Date: 15 September 2022

Classification: General Release

Title: Review of the Member/Officer Protocol

Policy Context: Ensuring that the Council's Constitution is

accessible and transparent and that it reflects the expectations of the public regarding the expected behaviour of members and officers, with a focus on the customer and putting them at the heart of

what we do.

Financial Summary: There are no financial implications.

Report of: Director of Law

1. Executive Summary

- 1.1 The purpose of the Member / Officer Protocol is to guide Members and Officers of the Council in their relations with one another. The intention is that it supports the establishment of good working relationships between Members and Officers as they work together and describes their different but complementary roles within the Council. A strong, constructive, and trusting relationship between Members and Officers is essential to the effective and efficient working of the Council. It also sets out the behaviours and treatment that each can expect from the other and thereby expands upon the Councillors Code of Conduct.
- 1.2 Following the former Business and Children's Policy and Scrutiny Committee review into the Marble Arch Mound project one of the recommendations which emerged was for the Standards Committee to undertake a review of the Member/Officer Protocol. This report highlights the work undertaken to review the protocol and sets out suggested amendments to strengthen the guidance on relationships between Officers and Members.

2. Recommendations

That the Standards Committee reviews the revised Member / Officer Protocol and following any further amendments recommends it to the General Purposes Committee and Full Council for approval.

3. Review of Current Protocol

- 3.1 The Protocol for Member and Officer Relations is contained within Chapter 7, Section 31 of the Council's Constitution. It is an adjunct to the Councillors' Code of Conduct and is an important contributor to the working culture within the Council. It sets out the differing roles of members and officers, what they can expect from each other and provides further explanation and guidance on appropriate behaviours.
- 3.2 The Standards Committee was asked by the former Business and Children's Policy and Scrutiny Committee to prioritise a review of the Member/Officer Protocol following the review into the Marble Arch Mound Project. It was considered the review should look at strengthening the role of officers and members in giving and receiving clear and independent advice whilst retaining the benefits of Members and officers working together to innovate. It was felt a review presented a good opportunity to revisit the existing provisions in the member / officer protocol and ensure it continued to reflect best practice.
- 3.3 Following the request to review the Protocol the Committee needs to consider the proposed amendments, and whether any further revisions are required, to strengthen the protocol.

3.4 If the amended Member / Officer Protocol is approved it is proposed to circulate the updated Protocol to all Members and the Executive Leadership Team. Officers will then be encouraged to discuss the Protocol within their teams and ensure it is fully understood.

4. Proposed Key Amendments

- 4.1 To ensure best practice the current protocol has been assessed against the protocols operated by other local authorities, these include, the Royal Borough of Kensington and Chelsea, Surrey County Council and Tower Hamlets London Borough Council.
- 4.2 The Interim Monitoring Officer at the time and the Head of Governance and Councillor Liaison have also consulted with the Executive Leadership Team and attended a number of departmental officer meetings to obtain feedback on the current protocol and to request feedback on how this could be updated/amended.
- 4.3 The views of Members via the Party Whips was also requested and has been reflected where appropriate.
- 4.3 Following this work undertaken the following amendments to the protocol are recommended to further strengthen the guidance on relationships between Officers and Members:
 - <u>Principles underlying Member Officer Relations</u> The protocol begins outlining the underlying principles of member/officer relations and lays out the foundation to their role within the Council. In order to ensure this vital paragraph is as clear and visible as possible however it is recommended to amend the layout to ensure it is as easy to understand as possible. This will also be a good opportunity to include and emphasise the importance of the Nolan Principles (Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty, Leadership), due to their importance to anyone who holds a position as a public officer.
 - Roles of Members and Officers This section only briefly summarises the role
 of members/officers and it is felt this could be strengthened by providing a
 more in-depth explanation highlighting key aspects and other specific roles,
 responsibilities, and processes. This is considered beneficial as it provides indepth information as to the structure of a Local Authority.
 - Relationship between Members and Officers This part of the Protocol is
 quite extensive and informative and allows members and officers to
 specifically consider the parts relevant to them. Following consultation
 however it is felt that there should be more clarity on a couple of areas. Firstly,
 greater clarity on the role of senior officers in handling member relationships
 and the different expectations placed on them vs more junior officers. It was
 considered more emphasis was required on councillor's day-to-day
 operational work, such as when they call front line staff with queries and how

those staff should respond. Secondly, it was also considered that a separate section relating to bullying by Members or Officers should be included so that it makes it clear the behaviours expected of individuals within the Council.

Access to Information – This section is considered clear and sets out that Members are on a 'need to know' basis, entitled to receive documents and information on request. It goes onto highlight that all Members have a statutory right to inspect documents relating to matters which are subject to a decision by the Council, Cabinet/Cabinet Member or Committee/Sub-Committee. One aspect of access to information though which could require some strengthening is regard to Press Releases, although it states that the information relating to this is set out 'elsewhere' in the Code of Governance it is considered this could be specific as it does not direct the reader to a specific place to find the information. In addition, it is also suggested there should be an additional section in relation to confidential information – this an important topic and should have its own section.

5. Financial Implications

5.1 There are no financial implications.

6. Legal Implications

- 6.1 The Members/Officer protocol set out in Chapter 7, Section 31 of the Constitution forms part of the Council's ethical framework and should be read in conjunction with the Council's Constitution, the Code of Conduct for Members, disciplinary codes which regulate the conduct of officers and other relevant codes and guidance.
- 6.3 The report requests that the Committee review the current protocol set out in Appendix 1 to the report and make any comment or specific requests

7. Carbon Impact

7.1 The decision will have no carbon impact.

8. Consultation

8.1 Chief Officers and Members have been consulted on amending the Protocol. Should the proposed amendments be agreed by the Committee then they will be considered by the General Purposes Committee before being reported to Full Council for adoption.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact:

Tristan Fieldsend, Senior Committee and Councillor Co-Ordinator

APPENDICES

APPENDIX A - AMENDED MEMBER/OFFICER PROTOCOL

BACKGROUND PAPERS

- Royal Borough of Kensington & Chelsea Constitution
- Surrey County Council Constitution
- Tower Hamlets London Borough Council Constitution



Protocol on Member/Officer Relations

31.1 Principles underlying Member – Officer relations:

- Good administration is dependent upon a successful relationship between Councillors and officers which can only be based upon mutual trust and an understanding of each other's roles and responsibilities.
- This relationship, and, the trust which underpins it, should not be abused or compromised.
- Accordingly, Councillors should not attempt in any way to influence the terms of officers' reports or recommendations on any matter.
- Equally, officers should give clear, independent advice. It is not enough to avoid actual impropriety.
- Members and Officers should at all times avoid any occasion for suspicion and any appearance of improper conduct.
- The fundamental principle which underlies Member/Officer relationships is that officers are required to be politically neutral.

31.2 The Nolan Principles

The Council's ethical framework is underpinned by the Seven Principles of Public Life also called the Nolan Principles that apply to anyone who is a public office holder. This protocol implements the Principles into practice as follows:

- Selflessness By ensuring that officers and members work together for the public benefit.
- Integrity By avoiding inappropriate influence on officers' activities and the delivery of services.
- Objectivity By ensuring officers act impartially and fairly between political groups and they are not asked or pressured to act otherwise by members.
- Openness By ensuring members are aware of their rights to information where information is confidential and should not be shared. Ensuring Officers respect members' rights and understand their limits, especially where personal information is involved.
- Accountability Breach of this protocol may be evidence of a breach of the Council's Code of Conduct or the officer code of conduct.

 Leadership - By treating others with respect and actively supporting the Nolan Principles in practice.

31.3 Roles of Members and Officers

- (1) For local government to be effective a strong working partnership between Members and officers must be established. This partnership can only be effective if it is based on mutual trust and respect. The contents of the Code of Governance and this protocol are intended to ensure that there is no doubt about the roles and procedures of the City Council, which will help this partnership to operate effectively.
- Officers serve the City Council as a whole, serving all elected Members. Officers must carry out the Council's work under the direction and control of the Council and properly constituted Committees and Sub-Committees, the Cabinet and Cabinet Members. A Member in an individual capacity (except a Cabinet Member acting within his / her terms of reference) can exercise no lawful authority and Members in general must operate through the Council and its Committees and Sub-Committees. Cabinet Members must exercise their functions in accordance with the Constitution and their terms of reference. However, it is also important that officers recognise the right of Members, the elected representatives, to determine policy and do not act in any way to undermine that right.
- (3) The Councillors are responsible for:
 - (a) providing a focus for community leadership in local wards and acting as advocates on behalf of constituents;
 - (b) giving the authority political leadership and deciding on overall Council policy;
 - (c) making decisions within overall Council policy;
 - (d) the scrutiny of Council policy and services; and
 - (e) representing the area and the Council externally.

Council officers are responsible for:

- (a) providing professional advice and relevant information (objectively and impartially) to elected members when they are formulating policy and taking decisions or scrutinising the decisions and actions of others;
- (b) implementing decisions made by Councillors/committees; and
- (c) taking managerial and operational decisions in accordance with the Council's schemes of delegation.

31.4 Relationship Between Members and Officers

Regular contact between Councillors and officers is necessary to ensure the efficient working of the Council. Councillors and officers should have regard to and respect for their different roles in such contacts. The level at which contact occurs will vary depending upon the nature of the service and the reason for the contact. Councillors and Officers involved should always bring concerns about issues affecting a department directly to the attention of the relevant Director.

31.5 Relationship between Chairman of Council and Officers

The Lord Mayor acts as Chairman of the Council. In this capacity the Lord Mayor is entitled to receive a briefing from officers on matters relating to the conduct of the Council Meeting.

31.6 Relationship between Leader and other Members of Cabinet and Officers

- (1) The Leader of the Council, as Chairman and a member of the Cabinet, has the duty to appoint the other members of the Cabinet (not exceeding 10 Members including the Leader). As such the Leader has a special responsibility at the centre of the Council. Other members of the Cabinet will be required to recognise this when taking decisions within their respective portfolios and otherwise keeping the Leader informed.
- (2) Officers will need to be conscious of the respective roles played by the Leader and individual Members of the Cabinet. These Members will require additional briefing on areas within their respective portfolios. It will be the responsibility of the relevant Chief Officer to ensure that this is carried out. Officers and Members will be asked to remember that Cabinet members are unable to take individual decisions without having first considered an Officer report.

31.7 Relationship between Chairmen and Members of Overview and Scrutiny Committees and Officers

- (1) The Chairmen and Members' of Overview and Scrutiny Committees have powers to call in decisions taken, but not implemented, in accordance with the procedures set out in the constitution.
- (2) The Chairmen and Members of Overview and Scrutiny Committees have a role in helping to ensure that Council services are provided in accordance with agreed policies. They can also require that reports relating to their areas of responsibility (as set out in the Terms of Reference) be submitted to assist them in their overview role. They can, however, only require this when acting collectively as a Committee.

(3) Officers have a duty to ensure that Chairmen of Overview and Scrutiny Committees receive sufficient information to enable them to conduct their roles in respect of both overview and scrutiny.

31.8 Role of Chairmen generally, including relationship with Officers

Standing Orders give Committee Chairmen certain responsibilities to control and conduct Meetings. Other than these powers the Chairmen are in the same constitutional position as all other members. Standing Orders also require Chairmen to be consulted by Chief Officers before certain delegated powers are exercised by the Chief Officer. The position of Chairmen as the spokesman for their Party on certain issues is informal, but reflects the reality that it would not be practical for Chief Officers to deal with whole committees or all fifty-four Members individually on a day to day basis. However, as emphasised above, Chairmen have no executive role or powers to make decisions relating to the discharge of Council functions. The power to make such decisions remains with the Council the Cabinet, the relevant Cabinet Member, committee or Chief Officer in accordance with the agreed scheme of delegation.

31.9 Officer Relationships with Party Groups

Meetings of Party Groups are essentially political forums, and as such, not attended by Officers.

Officers may attend these meetings to provide briefings only with the express permission of the Chief Executive and in such instances a similar briefing should be offered to all the Political Groups on the Council.

31.10 Members in their Ward role and Officers

- (1) Members of the Council will of course wish to take a special interest in matters in their ward. This is reflected in the Ward Member Consultation procedures, which are set out in the Code of Governance. Guidance in respect of Ward Member Consultation for officers is set out in detail in the Report Writing Guide. Under this procedure Members are consulted on all reports which affect their wards and have the right to have their comments included in the Committee reports. Members have a special role in the local community covered by their Ward and they may from time to time seek advice from Officers in respect of any matters in their Ward as a result. Provided these relate to the functions of the City Council this advice should be given.
- (2) Members will, through their ward casework, often be required to make contact with officers in a number of departments to obtain information on behalf of their constituents. This is perfectly in order and from time to time it may be appropriate for officers to reply to constituents on behalf of, or at the request of, Ward Members.

31.11 Bullying

- (1) Councillors and officers must not bully or harass any person. Bullying may be characterised as offensive, intimidating, malicious, insulting or humiliating behaviour. Such behaviour may happen once or be part of a pattern of behaviour directed at any person through means that undermine, humiliate, denigrate or injure the recipient. This can be contrasted with the legitimate challenges which a Councillor or officer can make in challenging policy or scrutinising performance.
- (2) Bad relations between Councillors and officers can be destructive to good governance and there has to be an understanding by Councillors that sometimes there may be a legitimate reason why member expectations cannot be met, e.g. because of a council policy or a legal requirement such as confidentiality.
- (3) Where a Councillor has a concern about an officer or the Council services then this should be made to the Director of the service where the Councillor feels the fault lies or to the Chief Executive where it involves a Director personally. Indeed, Councillors have a duty to raise any issues where they have reason to think that fraud/probity, corruption or malpractice of any sort is involved within the Council.

31.11 Councillor Access to documents and information

- (1) The City Council has agreed the following policy: "Information and documents should be made available on request by Officers to Members unless
 - (a) there is a clearly and properly justifiable reason for declining access and
 - (b) the Member in question cannot establish a legal right to the information or documentation".
- (2) Members are entitled on a "need to know" basis to receive documents and information on request where it is clear that the Member concerned requires the documentation or information because of their position within the City Council or by virtue of their Membership of a Committee or Sub-Committee.
 - However, if information is requested which is not readily available, or will require significant resources to produce, officers are advised to seek guidance from their respective Chief Officer, before providing the information.
- (3) In addition <u>all</u> Members of the Council have a separate statutory right to inspect documents relating to matters which are to be the subject of a decision by the Council, the Cabinet, a Cabinet member or a

Committee or Sub-Committee, provided that the documents are within the possession of the Council.

- (4) Members of the Council will only be entitled to receive such information and documents under their statutory right if it is not exempt or confidential in accordance with the provisions of the Access to Information legislation. However, they may nevertheless be entitled under their common law " to know" rights.
- (5) More details of Members' rights of access to information can be found in the Access to Information Procedure Rules set out in the Constitution and elsewhere in the Code of Governance.

31.12 Other individuals who are Members of Council Bodies

Co-opted Members of the Children and Young People Overview and Scrutiny Committee and the Independent Member of the Standards Committee are entitled to receive documents and information relating to their respective appointment in the same way as if they were an elected Member.

31.13 Press Releases

Full details of the framework for the issue of press releases, together with details of the role of the Council's Communications Section, are set out in Section 38 of the Constitution.

31.14 Correspondence and Communications

Members may telephone or email issues, which require responses to officers. Whatever method is used Members are entitled to receive a full response within 10 days. If for any reason this is not possible, a holding reply setting out the reasons for the delay should be sent as soon as possible (and <u>before</u> the expiry of the 10 days).

31.15 Confidentiality

- (1) Members and officers must be aware of and respect the limits on their access:
 - Receiving confidential information as a Councillor does not mean the information is public and can be shared with other members, constituents or the public. It remains confidential unless there is consent to disclosure or it is published. Consent can be given to disclosure either to specific persons or generally.
 - Individual's data protection rights and privacy must still be respected;
 - Confidential and personal information received as a Councillor cannot be used for party political purposes.

(2) A breach of confidentiality is likely to be a breach of the Members' Code of Conduct and place the Council at legal, financial and reputational risk. It potentially leaves the Councillor and Council at risk of legal action for breach of confidentiality and, for personal data, at risk of enforcement action by the Information Commissioner's Office.



Agenda Item 5



Standards Committee

Date: 15 September 2022

Classification: For General Release

Title: Work Programme 2022-2023

Report of: The Monitoring Officer

Financial Summary: There are no financial implications arising from

this report

Report Author and Contact

Details:

Tristan Fieldsend, Senior Committee and

Councillor Co-ordinator

Email: tfieldsend@westminster.gov.uk

1. Executive Summary

1.1 Members are asked to review the proposed work programme for 2022-2023 set out as Appendix 2 to the report and identify any other items it wishes to include on it.

2. Recommendations

2.1 That, having regard to the Committee's Terms of Reference attached as Appendix 1 of this report the Committee indicate any further items it wishes to be added to its future Work Programme.

3. Background Information

- 3.1 The production of a work programme is to enable the Committee to review and update its forthcoming work plan at each of its meetings.
- 3.2 In order to ensure the Committee undertakes its work programme, at the request of the Chairman, three meetings per annum have been programmed.

4. Financial Implications

4.1 There are no financial implications.

5. Legal Implications

5.1 There are no legal implications arising from this report.

If you have any questions about this report, or wish to inspect one of the background papers, please contact:

Tristan Fieldsend, Senior Committee and Councillor Co-ordinator tieldsend@westminster.gov.uk

Background Papers: None.

STANDARDS COMMITTEE TERMS OF REFERENCE

CONSTITUTION

6 Members of the Council, 4 Majority Party Members and 2 Minority Party Member.

TERMS OF REFERENCE

- (1) To promote and maintain high standards of conduct by the Members and Coopted Members of the City Council.
- (2) To advise the City Council on the adoption or revision of a Code of Conduct for Members.
- (3) Advising, training or arranging to train Members and Co-opted Members on matters relating to the City Council's Code of Conduct for Members.
- (4) To assist Members and Co-opted Members observe the City Council's Code of Conduct for Members.
- (5) To monitor the operation of Code of Conduct for Members.
- (6) Consider reports referred to the Committee by ethical standards officers or the Monitoring Officer of investigations into alleged breaches of the City Council's Code of Conduct for Members.
- (7) Where necessary, to conduct hearings into allegations of breaches of the said code, and interview officers, Members and others as required.
- (8) Determining whether allegations of breaches of the said code are made out and determining what action, if any, to take in relation hereto including, where it is determined that a breach has occurred, deciding what sanctions, if any, should be applied in relation to the Member or Member concerned (and for the avoidance of doubt, the Committee shall only have power to impose any sanction authorised by law).
- (9) Consider any complaints in respect of Members referred to the Committee under the City Council's "Whistleblowing" procedure and determining the action to be taken, if any.
- (10) To the extent allowed by the Law, granting dispensations in relation to Member and co-opted Member interests as referred to in the Members Code of Conduct.
- (11) To consider, advise and, if appropriate, take action upon other Member conduct issues not otherwise dealt with under these terms of reference.



Work Programme 2022/23 Standards Committee

15 September 2022						
Review of the Member/Officer Protocol	To receive a report on the revised Member/Officer Protocol.	Parveen Akhtar				
3 November 2022						
Annual Update on Member Complaints	To receive a report on complaints against members	Parveen Akhtar				
Annual Q&A with the Leader of the council on Ethical Standards	To submit questions to the Leader of the Council on Ethical standards in relation to Members					
23 March 2023						
Annual Code of Conduct Review	To receive an annual report reviewing the Code of Conduct	Parveen Akhtar				

