

STANDARDS COMMITTEE
18 MARCH 2019

REPORT OF COMMITTEE ON STANDARDS IN PUBLIC LIFE (CSPL)

LOCAL GOVERNMENT ETHICAL STANDARDS

REPORT OF THE MONITORING OFFICER

1. On 30 January 2019 CSPL published its long-awaited report into a review on Local Government Ethical Standards. The report makes 26 substantive recommendations for change and 15 'Best Practice' recommendations. A full copy of the report is available on the following web link - <https://www.gov.uk/government/publications/local-government-ethical-standards-report>.
2. The background to the review is that substantial changes to the national ethical framework were made by the Localism Act 2011. Ashford adopted its 'new' code of conduct and Arrangements for handling complaints in July 2012. The Government promised a review after 5 years of operation of the new system. The CSPL launched its review in early 2018 and called for evidence. Ashford's response to the Committee dated 10 May 2018 is attached for information.
3. The Localism Act removed the old national system overseen by the independent Standards Board. It was replaced with a local system of self-regulation which relied more on public censure through the democratic process and on political parties for upholding standards of conduct than strong powers of sanction such as suspension of councillors or removal from office. Late in the Localism Act legislative process, a limited 'Independent Person' role was introduced. New criminal offences were created in the Localism Act in relation to non-declaration of 'Disclosable Pecuniary Interests'. No code of conduct was prescribed nationally and the establishment of Standards Committees was no longer a statutory requirement.
4. The CSPL has maintained a watching brief over the 'new' system. It has expressed reservations in the past regarding the issues of sanctions, inconsistencies in the absence of national parameters and the limited role of independent persons.
5. Copies of the 26 substantive and 15 Best Practice recommendations are attached to this report. The CSPL report has been presented to the Prime Minister. Normally Government would respond within 3 months.

6. In the meantime there is an opportunity for this Committee to consider the 26 substantive recommendations in principle and convey any initial views to Government in order to encourage as swift a response as possible. Many but not all of the recommendations would require changes to primary legislation. In terms of the best practice recommendations, I suggest that I bring a detailed report to a future meeting of this Committee for discussion.
7. In terms of the 26 recommendations, I have included a brief comment/observation in the attached table which members may find helpful.
8. It is recommended that;
 - a. The Committee considers the substantive recommendations in principle and conveys its support or otherwise to Government for the taking forward of the 26 recommendations.
 - b. The Monitoring Officer present further reports to a future meeting of this Committee in relation to the Best Practice recommendations in the CSPL report, and in relation to the Government's response to the CSPL report in due course.

Terence Mortimer
Monitoring Officer
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Civic Centre
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Date March 2019

LIST OF RECOMMENDATIONS

Number	Recommendation	Responsible body	Comments
1	The Local Government Association should create an updated model code of conduct, in consultation with representative bodies of councillors and officers of all tiers of local government.	Local Government Association	SUPPORTED. Greater consistency and clearer expectations could then develop although we consider any such model code should be optional rather than compulsory since local variations may still be justified.
2	The government should ensure that candidates standing for or accepting public offices are not required publicly to disclose their home address. The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 should be amended to clarify that a councillor does not need to register their home address on an authority's register of interests.	Government	SUPPORTED as part of the anti-intimidation agenda. The Government has now changed election law as well with effect from May 2019.
3	Councillors should be presumed to be acting in an official capacity in their public conduct, including statements on publicly-accessible social media. Section 27(2) of the Localism Act 2011 should be amended to permit local authorities to presume so when deciding upon code of conduct breaches.	Government	CAUTIOUSLY SUPPORTED. In principle would bring much needed clarity but the grounds on which the presumption could be rebutted will be all important in ensuring a fair approach.
4	Section 27(2) of the Localism Act 2011 should be amended to state that a local authority's code of conduct applies to a member when	Government	SUPPORTED. This was the position prior to the Localism Act

	they claim to act, or give the impression they are acting, in their capacity as a member or as a representative of the local authority.		and it worked well and was well understood by councillors and public.
5	The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 should be amended to include: unpaid directorships; trusteeships; management roles in a charity or a body of a public nature; and memberships of any organisations that seek to influence opinion or public policy.	Government	SUPPORTED. The current categories are narrow. Not all Councils have included such matters in 'other interest' provisions of codes so consistency of approach would be achieved.
6	Local authorities should be required to establish a register of gifts and hospitality, with councillors required to record any gifts and hospitality received over a value of £50, or totalling £100 over a year from a single source. This requirement should be included in an updated model code of conduct.	Government	NO OBJECTION to a clearer, slightly wider rule on hospitality.
7	Section 31 of the Localism Act 2011 should be repealed, and replaced with a requirement that councils include in their code of conduct that a councillor must not participate in a discussion or vote in a matter to be considered at a meeting if they have any interest, whether registered or not, "if a member of the public, with knowledge of the relevant facts, would reasonably regard the interest as so significant that it is likely to prejudice your consideration or decision-making in relation to that matter".	Government	SUPPORTED subject to clarification. It appears to propose a return to a statutory formulation of the old 'prejudicial interest' test prior to the Localism Act. This is in effect captured already in

Number	Recommendation	Responsible Body	Comments
7. cont.			the Kent code under 'Other Significant Interest' provisions but the Kent Code does allow representations to be made at meetings before a councillor then leaves the meeting. It is not clear whether the proposal here involves an ability to speak or a requirement to leave. Clarification is required.
8	The Localism Act 2011 should be amended to require that Independent Persons are appointed for a fixed term of two years, renewable once.	Government	The case for this restriction is unproven. Further assessment should be made before universally abandoning the use of experienced IPs.
9	The Local Government Transparency Code should be updated to provide that the view of the Independent Person in relation to a decision on which they are consulted should be formally recorded in any decision notice or minutes.	Government	SUPPORTED. There is no reason to withhold this information.
10	A local authority should only be able to suspend a councillor where the authority's Independent Person agrees both with the finding of a breach and that suspending the	Government	SUPPORTED. This helps avoid the risk or perception of unfairness or

	councillor would be a proportionate sanction.		political motivation in the use of this serious sanction.
11	Local authorities should provide legal indemnity to Independent Persons if their views or advice are disclosed. The government should require this through secondary legislation if needed.	Government/all local authorities	SUPPORTED. The proposal is to put in place similar protections as already exist for councillors in some circumstances.
12	Local authorities should be given the discretionary power to establish a decision-	Government	SUPPORTED. This was the position pre – Localism Act. An
12. cont.	making standards committee with voting independent members and voting members from dependent parishes, to decide on allegations and impose sanctions.		enhanced role for IPs is likely to increase public confidence
13	Councillors should be given the right to appeal to the Local Government Ombudsman if their local authority imposes a period of suspension for breaching the code of conduct.	Government	SUPPORTED. Appropriate safeguards for use of such a sanction are critical.
14	The Local Government Ombudsman should be given the power to investigate and decide upon an allegation of a code of conduct breach by a councillor who has had a suspension imposed. The Ombudsman's decision should be binding on the local authority.	Government	This appears to be, in effect a right of appeal to the Ombudsman in the case of suspension. This is an appropriate safeguard. SUPPORTED.
15	The Local Government Transparency Code should be updated to require councils to publish annually: the number of code of conduct complaints they receive; what the complaints broadly relate to (e.g bullying; conflict of interest); the outcome of	Government	The Kent Code's Arrangement does already require some transparency so this recommendation is SUPPORTED.

	those complaints, including if they are rejected as trivial or vexatious; and any sanctions applied.		
16	Local authorities should be given the power to suspend councillors, without allowances, for up to six months.	Government	This is SUPPORTED provided appropriate safeguards are put in place to ensure fairness.
17	The government should clarify if councils may lawfully bar councillors from council premises or withdraw facilities as sanctions. These powers should be put beyond doubt in legislation if necessary.	Government	This is SUPPORTED.
18	The criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished.	Government	This is SUPPORTED. The current regime provides a disproportionate focus on a very limited range of DPIs.
19	Parish council clerks should hold an appropriate qualification, such as those provided by the Society of Local Council Clerks.	Parish councils	This is SUPPORTED. Parish Councils increasingly require levels of expertise.
19. cont.			and training in governance matters.
20	Section 28(11) of the Localism Act 2011 should be amended to state parish councils must adopt the necessary amendments, or the new model code.	Government	This is SUPPORTED in the interests of consistency.
21	Section 28(11) of the Localism Act 2011 should be amended to state that any sanction imposed on a	Government	This is SUPPORTED. There have been

	parish councillor following the finding of a breach is to be determined by the relevant principal authority.		examples elsewhere in the country where Parish Councils have refused to impose sanctions determined by principal Councils.
22	The Local Authorities (Standing Orders) (England) (Amendment) Regulations 2015 should be amended to provide that disciplinary protections for statutory officers extend to all disciplinary action, not just dismissal.	Government	This is SUPPORTED. The amended regime introduced in 2015 dilutes the protection in a way widely regarded as inappropriate.
23	The Local Government Transparency Code should be updated to provide that local authorities must ensure that their whistleblowing policy specifies a named contact for the external auditor alongside their contact details, which should be available on the authority's website.	Government	This is SUPPORTED. ABC's policy already includes these different contact options.
24	Councillors should be listed as 'prescribed persons' for the purposes of the Public Interest Disclosure Act 1998.	Government	This is SUPPORTED.
25	Councillors should be required to attend formal induction training by their political groups. National parties should add such a requirement to their model group rules.	Political groups National political parties	This would ensure a broader roll-out of important training for councillors. Whether it should be mandatory to the extent suggested is something the Standards

			Committee may wish to discuss.
26	Local Government Association corporate peer reviews should also include consideration of a local authority's processes for maintaining ethical standards.	Local Government Association	This is SUPPORTED. External review of ethical frameworks would be helpful and worthwhile.

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AshfordBoroughCouncil

Our Ref TWM/Wrk 18
Your Ref
Date 10 May 2018

Dear Sirs,

**COMMITTEE ON STANDARDS IN PUBLIC LIFE CONSULTATION ON LOCAL
GOVERNMENT ETHICAL STANDARDS**

I set out below the Consultation Response on the above matter on behalf of Ashford Borough Council's Standards Committee:

General Questions

- a. Are the existing structures, processes and practices in place working to ensure high standards of conduct by local councillors? If not, please say why.
- b. What, if any, are the most significant gaps in the current ethical standards regime for local government?

ABC Response

ABC currently has 43 members and operates the 'strong leader' model of executive government. Structures are determined locally, driven by the provisions of primary legislation. There is no longer a national body to oversee arrangements or provide guidance on ethical standards. In



Ashford, a ‘Kent Model’ of Code of Conduct and Arrangements for Dealing with Complaints were developed based on the previous national code as this was considered preferable to ensure consistency, continuity and clearly defined expectations. The Council has also adopted – and recently reviewed – a Good Practice Protocol for councillors dealing with planning matters.

The Council’s processes for receiving, considering and investigating complaints are therefore tried and tested and regarded as sound and effective. Although the level of complaint has been low since the new regime came into effect, during 2017 numbers of complaints did rise, principally on account of social media use/misuse by councillors.

Probity and Code of Conduct training is provided for all Members upon election and the Council has in place an experienced Independent Person to fulfil the statutory role required. The Council’s Standards Committee is the principal forum for consideration of probity and ethical issues and receives and considers the Monitoring Officer’s Annual Report each year on Code of Conduct, probity and Ombudsman complaint matters.

In relation to gaps in the local government regime the Council is aware of ongoing concerns nationally regarding (a) the effectiveness of the current range of sanctions available in the event of findings of breach of the Code of Conduct and (b) the legal scope of Disclosable Pecuniary Interests. These matters are picked up separately under the relevant questions below.

Codes of conduct

- c. Are local authority adopted codes of conduct for councillors clear and easily understood? Do the codes cover an appropriate range of behaviours? What examples of good practice, including induction processes, exist?
- d. A local authority has a statutory duty to ensure that its adopted code of conduct for councillors is consistent with the Seven Principles of Public Life and that it includes appropriate provision (as decided by the local authority) for registering and declaring councillors’ interests. Are these requirements appropriate as they stand? If not, please say why.

ABC Response

The ABC Code follows a ‘Kent Model’ developed in line with the former national Code. It is very much based upon the Seven Principles of Public Life and it is considered to cover an appropriate range of conduct and declaration of a wider range of interests than just the statutory DPs. The ‘Kent Model’ requires declaration of ‘Other Significant Interests’



(OSIs) and non-participation in decisions where such interests arise. Having said this, Codes of Conduct must be kept up to date with social developments and changes in public perception and opinion. For this reason ABC recently agreed to promote amendments to its Code to better capture the risks inherent in the growing use of social media by councillors. Comprehensive induction programmes are provided for all borough councillors upon election, including code of conduct and probity training. Parish Councils are invited to participate where possible.

Investigations and decisions on allegations

- e. Are allegations of councillor misconduct investigated and decided fairly and with due process?
 - i. What processes do local authorities have in place for investigating and deciding upon allegations? Do these processes meet requirements for due process? Should any additional safeguards be put in place to ensure due process?
 - ii. Is the current requirement that the views of an Independent Person must be sought and taken into account before deciding on an allegation sufficient to ensure the objectivity and fairness of the decision process? Should this requirement be strengthened? If so, how?
 - iii. Monitoring Officers are often involved in the process of investigating and deciding upon code breaches. Could Monitoring Officers be subject to conflicts of interest or undue pressure when doing so? How could Monitoring Officers be protected from this risk?

ABC Response

The 'Arrangements' adopted by the Council for dealing with Code breach complaints are comprehensive and were developed as a Kent-wide model based upon experience with earlier standards regimes. As such they are considered robust, proportionate and fair. The involvement of the Independent Person at appropriate stages is safeguarded in the adopted Arrangements. In general the arrangements under the new regime work better and in a more proportionate way by giving councils greater flexibility to manage complaints. It is considered important that the Monitoring Officer retains an ability to advise and guide Standards Committee and any Hearing Panels in the event of matters being referred for investigation. For this reason, investigations should be carried out independently either by suitably qualified staff or by external investigators.



Sanctions

- f. Are existing sanctions for councillor misconduct sufficient?
- i. What sanctions do local authorities use when councillors are found to have breached the code of conduct? Are these sanctions sufficient to deter breaches and, where relevant, to enforce compliance?
 - ii. Should local authorities be given the ability to use additional sanctions? If so, what should these be?

ABC Response

Under the former national regime, a wider range of sanctions was available in the event of a breach of the Code of Conduct. In particular, it was possible in serious cases to suspend a councillor or even disqualify. Although these were rarely used, they did provide options in the most serious or persistent cases. Under the current regime, the range of sanctions is set out in the adopted Arrangements but is more limited and relies upon public censure as the principal sanction. Other possible sanctions are limiting access to resources, requiring training to be given or recommending removal from certain committees or roles. However, the latter requires co-operation from group leaders and full Council and so relies upon party discipline. Criminal prosecution for certain failures regarding pecuniary interest declaration is obviously available only in a very narrow context and is not a sanction available to Standards Committees.

Discussion about the appropriateness of the more limited range of sanctions has been ongoing nationally ever since the new regime was introduced in 2012. There is a school of thought that depriving councillors of their representative role – through suspension or disqualification – is inappropriate for an elected office. On the other hand, having nothing stronger than censure in cases of serious or persistent misconduct is seen as equally inappropriate by many. The options of suspension, or perhaps some kind of ‘recall’ right (whereby a councillor would have to seek re-election) are therefore seen by some as necessary for use in the most serious cases, provided appropriate safeguards are put in place.

The Council is aware that in the past CSPL has itself expressed doubts about whether the new “slimmed down arrangements” would prove sufficient (for example in its publication “Standards Matter” in January 2013). Also in its Annual Report in September 2014 the Committee considered that:



“the effectiveness of the sanctions regime for non-adherence to local authority codes of conduct, which apart from criminal prosecution provides only for censure or suspension from a particular committee, remains an issue of concern. We are aware that there have been recent individual cases that illustrate this, in particular the lack of a sanction to suspend councillors who have seriously breached the Code of Conduct. In contrast to the recent public debate on parliamentary standards calling for greater sanctions, tightening of codes and a greater independent element, local government is now largely self-regulated with no systematic approach to conduct issues and limited sanctions. There remains in our view a significant risk under these arrangements that inappropriate conduct by local authority members will not be dealt with effectively, eroding public confidence and trust in local government”.

It is worth noting as well that in 2013 in Thanet an Independent Members Report to the Council identified that there had been occasions then where councillors had stated they did not intend to comply with standards hearing outcomes because of the absence of meaningful sanctions.

Whilst this Council has no experience of the problems alluded to in these other reports, it recognises there is a credible argument to consider the introduction of a more powerful sanction such as temporary or partial suspension provided appropriate safeguards and procedures are put in place to ensure its use only in the most serious cases. Other options for consideration include a possible “right of recall” for Local Councillors or the introduction of greater local discretion on the range of sanctions available.

Declaring interests and conflicts of interest

- g. Are existing arrangements to declare councillors’ interests and manage conflicts of interest satisfactory? If not please say why.
 - i. A local councillor is under a legal duty to register any pecuniary interests (or those of their spouse or partner), and cannot participate in discussion or votes that engage a disclosable pecuniary interest, nor take any further steps in relation to that matter, although local authorities can grant dispensations under certain circumstances. Are these statutory duties appropriate as they stand?
 - ii. What arrangements do local authorities have in place to declare councillors’ interests, and manage conflicts of interest that go



beyond the statutory requirements? Are these satisfactory? If not, please say why.

ABC Response

As already indicated, the Council’s Code of Conduct does include a duty to declare interests – and withdraw from meetings – on a significantly wider basis than just the statutory DPIs. Indeed the Council has adopted very much best practice in this regard by ensuring each agenda for each public committee meeting has a first item under which members must declare interests in these categories or indeed other interests on a voluntary basis for transparency reasons. Each agenda includes a detailed explanation of the rules on declarations. This process helps promote an effective, open culture of declaration of interests.

However, there remains significant concern among practitioners and some members about the lack of clarity about the legal scope of the DPI regime in some circumstances. This is particularly unsatisfactory bearing in mind that criminal liability can arise from breaching the statutory DPI rules and it is imperative therefore that the rules are clear, clearly understood and consistently applied. At present this is not the case.

The fundamental problem is in the wording of the Localism Act which requires members to declare interests (and not participate at meetings) when they have a DPI “in any matter to be considered at a meeting”. Under the former regime, the situation was much clearer as an interest arose where a matter under consideration “relates to or is likely to affect” the interest, thus creating a nexus between the item of business and the incidence of interest. This nexus is absent from the Localism Act regime and it creates significant uncertainty as to when a DPI exists in certain situations.

The problem is best illustrated by a simple and common situation from the standard planning application decision-making process. Example: A councillor who is a member of the Council’s Planning Committee lives next to a development site. He owns his home and believes the development is likely to materially affect his amenity and value of his house. The application comes before the Committee for decision. Many Monitoring Officers would not regard the councillor’s land interest as a DPI in this situation. This is because the councillor’s land is not the subject of the decision, albeit that the decision would affect his land interest. However, some Monitoring Officers do regard the councillor’s land interest as a DPI in the planning decision on the basis the interest could be said to be “in the matter to be considered” since it would be affected by it and the public might have expected the legislation to apply in this way.



It is particularly unsatisfactory that such lack of clarity should surround a key part of the current ethical standards regime. It is imperative that the matter should be clarified and resolved in the public interest, especially since criminal liability may turn on the interpretation in a particular case.

Whistleblowing

- h. What arrangements are in place for whistleblowing, by the public, councillors, and officials? Are these satisfactory?

ABC Response

A whistleblowing policy is in place at the Council. It is primarily available to officers (and employees of contractors). Members of the public would normally be directed to the Council's complaints procedures or to statutory officers for specific areas of complaint. The Council has no experience of a councillor being unable to raise and pursue a concern through normal internal channels. The arrangements are considered satisfactory.

Improving standards

- i. What steps could *local authorities* take to improve local government ethical standards?
- j. What steps could *central government* take to improve local government ethical standards?

ABC Response

Increasing the visibility and accessibility of the code of conduct and complaint process as part of website redesign and digital transformation projects would raise awareness and make the system easier to use.

Also providing more structured guidance around the risk of misuse of social media could help reduce the incidence of complaints.

ABC is proposing to take steps on each of these matters.

In terms of central government, early consideration of the issue of sanctions, and the legal scope of the DPI regime would help raise confidence and provide greater clarity in the system.

Intimidation of local councillors

- k. What is the nature, scale, and extent of intimidation towards local councillors?



- i What measures could be put in place to prevent and address this intimidation?

ABC Response

The personal contact details of members are generally in the public domain but in exceptional cases these can be removed if there is evidence of a risk of intimidation or violence. Details have been removed or withheld in a small number of cases at Ashford.

In December 2017 the CSPL published a report “Intimidation in Public Life”. This arose principally from the level of intimidation experienced by parliamentary candidates at the 2017 General Election. Widespread use of social media platforms were seen as the most significant factor driving intimidating behaviour. The report makes a number of recommendations relevant to the local government sector and in particular the following measures are supported:

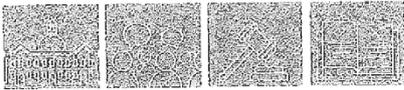
- proposed legislation to shift some balance of liability for illegal content to social media companies and to ensure removal of intimidatory content.
- establishment of social media reporting teams during election campaigns to ensure swift action on intimidatory content
- political parties themselves setting clear expectations in a joint code of conduct about behaviour expected of their members prohibiting intimidatory behaviour.
- possible creation of new electoral offences on intimidating behaviour.
- better response mechanisms and training for police on intimidation in election campaigns.

Yours faithfully



Corporate Director (Law and Governance)
& Monitoring Officer





List of best practice

List of best practice

Our best practice recommendations are directed to local authorities, and we expect that any local authority can and should implement them. We intend to review the implementation of our best practice in 2020.

Best practice 1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.

Best practice 2: Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation, and prohibiting trivial or malicious allegations by councillors.

Best practice 3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.

Best practice 4: An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.

Best practice 5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.

Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.

Best practice 7: Local authorities should have access to at least two Independent Persons.

Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.



List of best practice

Best practice 9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.

Best practice 10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.

Best practice 11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council as a whole, rather than the clerk in all but exceptional circumstances.

Best practice 12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.

Best practice 13: A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.

Best practice 14: Councils should report on separate bodies they have set up or which they own as part of their annual governance statement, and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness, and publish their board agendas and minutes and annual reports in an accessible place.

Best practice 15: Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.