

Report of: Donna Nolan

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The Standards Regime – Peer Review

1. Purpose of Report

- 1.1 The Localism Act 2011 (the Act) made fundamental changes to the system of regulation of standards of conduct for Councillors and Co-opted Members. This report reviews the Council's system.
- 1.2 This report revisits the changes brought into force by the Act and recommends points for debate and proposed actions to assist the Council to further improve its system. To enable consideration of the recommendations a number of model documents and examples are appended to this report.
- 1.3 It is important to note that this report does not highlight any fundamental issues in respect of the Council's current ethical standards regime.

2. Introduction

- 2.1 Following the recent resignation of the Council's Monitoring Officer the Chief Executive has sought a peer review of the Council's current standards regime.
- 2.2 This review has been undertaken mindful of the fact that the Council has appointed a new Legal Services Group Manager and Monitoring Officer and thus this report has been prepared with the intention of assisting the Council and the new post holder ameliorate its current standards regime.
- 2.3 Sally Gabriel, Member Services Manager and Jill May, Director of Corporate Affairs and Business Transformation, have been very supportive in enabling this review.

3. The Code of Conduct

- 3.1 In accordance with the Act, the Council has adopted a new Code of Conduct governing elected and Co-opted Members' conduct, when acting in that capacity. The Council has discretion as to what it includes in its Code of Conduct provided it is consistent with the following seven Nolan principles :-

- **Selflessness**
Holders of public office should act solely in terms of the public interest.
- **Integrity**
Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- **Objectivity**
Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- **Accountability**
Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- **Openness**
Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- **Honesty**
Holders of public office should be truthful.
- **Leadership**
Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

3.2.1 The Act requires the registration and disclosure of Disclosable Pecuniary Interests (DPIs) which are defined by Regulations.

3.2.2 A DPI covers the Members (and his/her spouse or civil partner) “employment, office, trade, profession or vocation”; any “sponsorship” of the Member including contributions towards their elections expenses, and trade union membership; “contracts” between the Member and Council; “land” in which the Councillor has an interest and lies within the authority’s area and “any corporate tenancies”; and certain “securities” the Member may hold.

3.2.3 The Act also requires an authority’s Code of Conduct to include such provision as it deems appropriate for the registration and disclosure of other non-disclosable pecuniary interests and non-pecuniary interests.

Recommendation

- (1) *Review the current Code of Conduct and consider in particular;*
 - a) *the introductory comments in the code;*
 - b) *the descriptors of the seven Nolan principles;*
 - c) *legal definition of Disclosable Pecuniary Interests;*
 - d) *inter-relationship of the Code and criminal sanctions (see also paragraph 4 below);*
 - e) *dispensations (see also Section 11 below);*
 - f) *sensitive interests (see also Section 9 below);*
 - g) *pre-determination (see also Section 12 below);*
 - h) *gifts and hospitality.*

At Appendix 1 is a comprehensive model Code of Conduct, which consolidates all the above key matters into one document.

- (2) *Review guidance and training provided to Members and Co-opted Members of this Council and Parish Councillors and Co-opted Members of relevant Parish Councils in relation to the Code of Conduct.*

4. Disclosable Pecuniary Interests

4.1 The Act prohibits Councillors with a DPI from participating in authority business. A DPI is defined under the Act and includes:

- a. an interest of the Member/Co-opted Member; or
- b. an interest of:
 - i. the Member's/Co-opted Member's spouse or civil partner;
 - ii. a person with whom the Member/Co-opted Member is living as husband and wife; or
 - iii. a person with whom the Member/Co-opted Member is living as if they were civil partners.

and the Member/Co-opted Member is aware that the other person has the interest.

- 4.2 A new (or re-elected) Member of the Council must notify the Monitoring Officer of any DPI (or any unregistered “disclosable pecuniary interest” if the case of a re-elected Member) before the end of 28 days beginning with the day on which the person becomes a Member/Co-opted Member of the Council.
- 4.3 Unless otherwise registered in the register of interests a Member/Co-opted Member attending a Council meeting (i.e. meeting of the Council, or any committee, sub-committee, joint committee or sub-joint committee of the Council), must disclose that “disclosable pecuniary interest(s)” to the meeting.
- 4.4 A Member/Co-opted Member does not have to disclose the nature of the disclosable pecuniary interest if it is sensitive. A sensitive disclosable pecuniary interest is one which if disclosed could lead to the Member/Co-opted Member or a person connected with him/her, being subjected to violence or intimidation.
- 4.5 Where an unregistered disclosable pecuniary interest is disclosed at a meeting the relevant Member/Co-opted Member must notify the Monitoring Officer of the disclosable pecuniary interest with 28 days of the date of the meeting in question.
- 4.6 There is no explicit requirement for a Councillor/Co-opted Member to keep the register up to date, except on re-election or re-appointment, but it is likely that Councillors will register new interests from time to time, as this will avoid the need for disclosure in meetings. When additional notifications are given, the Monitoring Officer has to ensure that they are entered into the register.

Failure to disclose DPIs

- 4.7 A person commits an offence if, without reasonable excuse, he/she fails to register or disclose a DPI as required or knowingly or recklessly provides information in relation to a DPI that is false or misleading.
- 4.8 A person who commits an offence as outlined in paragraph 4.1, shall upon summary conviction be liable to a fine not exceeding £5,000 (five thousand pounds) and may be disqualified for a period not exceeding 5 years from being or becoming a Member or Co-opted Member of a Council.
- 4.9 Any criminal proceedings shall be brought by or on behalf of the Director of Public Prosecutions and may be brought within 12 months of the date evidence existed that was both in the knowledge and to the opinion of the prosecutor, sufficient to warranted proceedings.

Recommendation

- (1) *Review guidance and training provided to Members and Co-opted Members of this Council and Parish Councillors and Co-opted Members of relevant Parish Councils regarding the status of DPI's.*
- (2) *Review the process for pro-actively ensuring the Council's Register of Interests is reviewed on a regular basis; and that changes in*

circumstances are notified.

- (3) *Agree a protocol with the Police in relation to allegations of a failure to declare a DPI.*

At Appendix 2 is a comprehensive model Police Protocol which details how both the Monitoring Officer and the Police will handle and investigate criminal offences created by the Act.

5. Arrangements for dealing with misconduct complaints

Arrangements

- 5.1 The Act requires the Council to adopt arrangements for dealing with complaints of misconduct both by Councillors and Co-opted Members of the Council and by Parish Councillors and Co-opted Members of Parish Councils within its district. Such complaints can only be dealt with in accordance with these arrangements which must set out in some detail the process for dealing with them and the actions that may be taken against a Councillor who is found to have failed to comply with the Code of Conduct.
- 5.2 Statutory provisions of the Localism Act do not give the Standards Committee or the Monitoring Officer special powers to deal with complaints, and thus the Council must have delegated appropriate powers to the Standards Committee and to the Monitoring Officer.

Recommendation

- (1) *Ensure the scheme of delegation is up to date regarding the procedure for dealing with complaints.*

At Appendix 3 is a model delegation to the Monitoring Officer which details matters relevant to the Act most likely to be delegated to that Officer.

- (2) *That a legal jurisdiction criteria test is introduced as a preliminary test to the process for determining complaints.*

At Appendix 4 is a model legal jurisdiction test which details the first stage assessment criteria to be applied by the Monitoring Officer upon receipt of a a complaint.

- (3) *That the “local assessment criteria” test is reviewed.*

At Appendix 5 is a comprehensive model local assessment criteria test to be applied by the Monitoring Officer to determine if further action is appropriate in relation to those complaints which meet the legal jurisdiction test.

- (4) *That consideration is given to enabling the Monitoring Officer to seek*

additional information from the Complainant and the Subject Member (or, if applicable, the Parish Clerk) before deciding how to deal with the complaint.

- (5) *That consideration is given to including in the arrangements for dealing with complaints process a delegation to the Monitoring Officer to seek to resolve the complaint locally/informally.*

At Appendix 6 is a model local resolution process which enables the Monitoring Officer, in consultation with the Independent Person, to resolve complaints informally at any time in the process. Such an approach is often the simplistic and most cost effective way of resolving a complaint.

- (6) *That consideration is given to adopting a procedure for Investigation of a Complaint.*

At Appendix 7 is a model Investigation of Complaint Procedure, which explains the role of the Investigating Officer and the processes relating to the investigation.

- (7) *That consideration is given to updating the Hearing Panel Procedure.*

At Appendix 8 is a comprehensive model Hearing Panel Procedure which consolidates rules, processes and the sanctions available to them in the event the Committee determine that a Member has failed to comply with the Code of Conduct.

6. Sanctions

- 6.1 The Act does not give the Council or its Standards Committee any powers to impose sanctions such as suspension or impose requirements for training on errant Councillors. So, where a failure to comply with the Code of Conduct is found, the range of actions which the Council can take in respect of the councillor is limited. In practice, this might include the following:
- (a) reporting its findings to a meeting of the full Council [*or to the relevant Parish Council*] for information and/or censure (i.e. the issue of an unfavourable opinion or judgement or reprimand) by motion;
 - (b) issuing a press release/or other appropriate publicity;
 - (b) recommending to the Councillor's political group leader (or in the case of un-grouped Councillors, recommend to Council or to committees) that they be removed from any or all Committees or Sub-Committees of the Council for a specified period;
 - (c) recommending to the Leader of the Council that an Executive Councillor be removed from the Executive, or removed from particular portfolio responsibilities;

- (d) recommending appropriate training for the Councillor;
- (e) recommending to the Council the removal of the Councillor [*or recommending to the relevant parish council that the councillor be removed*] from all outside appointments to which they have been appointed or nominated by the Council [*or by the relevant parish council*] for a specified period;
- (f) withdrawing [*or recommending to the relevant parish council that it withdraws*] facilities provided to the councillor by the Council for a specified period, for example electronic access to the Council's systems; or
- (g) excluding [*or recommending that the relevant parish council excludes*] the Councillor from the Council's offices or other premises for a specified period, with the exception of meeting rooms as necessary for attending Council, committee and sub-committee meetings; or,
- (h) instructing the Monitoring Officer to apply the local/informal resolution process; or,
- (i) sending a formal letter to the Councillor.

6.2 Such sanctions can take effect immediately or take effect at a later date and the sanction can be time limited.

6.3 Without the consent of the relevant Member and subject to any disciplinary action within the Members' own political group, the sanctions available following a finding of a breach of the Code of Conduct, following investigation, are very limited. It is not permissible to suspend or disqualify the Councillor or to withdraw any basic or special responsibility allowance.

6.4 There is a particular difficulty in respect of Parish Councils, as the Act gives the Standards Committee no power to do any more in respect of a Member of a Parish Council than make a recommendation to that Parish Council on action to be taken in respect of the Member. Parish Councils will be under no obligation to accept any such recommendation.

Recommendation

- (1) *The range of sanctions available should be made clear in the complaints process and procedures.*
- (2) *That the sanctions referred to in Article 10 of the Constitution, and in particular paragraph 10.4(10) should be reviewed.*

7. Appeals against a Decision

7.1 There is no requirement by the Act to put in place any appeals mechanism

against decisions taken by the Monitoring Officer or the Standards Committee. Any decision would be open to judicial review by the High Court if it was unreasonable, or if it were taken improperly, or if it sought to impose a sanction which the authority had no power to impose. Complaints of maladministration in dealing with a complaint fall within the jurisdiction of the Local Government Ombudsman.

Recommendation

(1) *Review the current appeal process.*

8. Independent Person(s)

Independence

- 8.1 The arrangements adopted by the Council must include provision for the appointment by the Council of at least one Independent Person.
- 8.2 The Independent Person must be appointed through a process of public advertisement, application and appointment by a majority of the Members of the Council.
- 8.3 A person is considered not to be “independent” if –
- he is, or has been within the last five years, an elected or Co-opted Member or an Officer of the Council or of any of the Parish Councils within the district;
 - he is, or has been within the last five years, an elected or Co-opted Member of any Committee or Sub-Committee within the district; or
 - he is a relative or close friend of a current elected or Co-opted Member or officer of the Council or any parish council within the district, or of any elected or Co-opted member of any Committee or Sub-Committee of such Council.

For this purpose, “relative” comprises –

- (a) The candidate’s spouse or civil partner;
- (b) any person with whom the candidate is living as if they are spouses or civil partners;
- (c) the candidate’s grandparent;
- (d) any person who is a lineal descendent of the candidate’s grandparent;
- (e) a parent, brother, sister or child of anyone in paragraphs (a) or (b);
- (f) the spouse or civil partner of anyone within paragraphs (c), (d) or (e); or

- (g) any person living with a person within paragraphs (c), (d) or (e) as if they were spouse or civil partner to that person.

Functions of the Independent Person

8.4 The functions of the Independent Person(s) are:

- They must be consulted by the Council before it makes a decision on an allegation of misconduct by a Councillor that it has decided to investigate including before it decides on action to be taken in respect of that councillor (this means on a decision to take no action where the investigation finds no evidence of breach or, where the investigation finds evidence that there has been a breach, on any local resolution of the complaint, or on any finding of breach and on any decision on action as a result of that finding);
- they may be consulted by the authority in respect of a standards complaint at any other stage; and
- they may be consulted by a Councillor or Co-opted Member of the Council or of a Parish Council against whom a complaint has been made.

8.5 This causes some problems, as it would be inappropriate for an Independent Person who has been consulted by the councillor against whom the complaint has been made, and who might as a result be regarded as prejudiced on the matter, to be involved in the determination of that complaint.

How many Independent Persons?

8.6 The Act gives discretion to appoint one or more Independent Persons, but provides that the Independent Person must be consulted before any decision is taken on a complaint which has been investigated.

8.7 In practice in Councils where more than one Independent Person is appointed one will essentially act as a 'reserve'; whilst other Councils share Independent Persons thus ensuring the "reserve" will not have been consulted before any decision is taken on a complaint.

Recommendation

- (1) *Review the process and procedures for consulting of the Independent Person(s) in the complaints process, including local resolution (if adopted).*
- (2) *Determine the process for consulting with the Independent Person(s) and how the issue of potential conflict of interest will be addressed.*

(3) *Consider the adoption of an Independent Person Protocol.*

At Appendix 9 are two model Independent Person Protocols.

(4) *That the adoption of an arrangement to share the use of Independent Persons with another principal Council, in the event of a conflict of interest is considered.*

(5) *Ensure that the provision of the Local Authorities (Standing Orders) (England) (Amendment Regulations) have been adopted; and that the Independent Persons are aware of their formal statutory role in advising the Council prior to any vote on whether to dismiss the Council's Head of Paid Service, Monitoring Officer and Chief Finance Officer. Ensure that the Constitution and relevant HR Policies and Procedures reflect the Regulations.*

9. The Register of Councillors' Interests

9.1 The Monitoring Officer is required to maintain a register of interests, which must be available for public inspection and available on the Council's website. The Monitoring Officer is also responsible for maintaining the register for Parish Councils within the district, which also have to be open for public inspection at the Council offices and on the Council's website.

9.2 Where a Councillor is concerned that disclosure of the detail of an interest (either a DPI or any other interest which they would be required to disclose) at a meeting or on the register of interests would lead to the councillor or a person connected with them being subject to violence or intimidation, they may request the Monitoring Officer to agree that the interest is a "sensitive interest".

9.3 If the Monitoring Officer agrees, then such interests may be excluded from the Council's Register of Interests that is available for public inspection or published. The Councillor then merely has to disclose the existence of an interest, rather than the detail of it, at a meeting.

9.4 The Monitoring Officer is required by the Act to set up and maintain registers of interest for each parish council within the district, available for inspection at the Council offices and on the Council's website and, where the Parish Council has a website, provide the Parish Council with the information required to enable the Parish Council to put the current register on its own website.

Recommendation

(1) *Review the Declaration of Interest Form in terms of potential data protection issues.*

(2) *Update current guidance on the administration and declaration of Sensitive Interests.*

The model Code of Conduct at Appendix 1 contains appropriate

guidance regarding Sensitive Interests.

At Appendix 10 is a model Sensitive Interests Registration Form for completion by a Member wishing to have an interest treated as sensitive.

- (3) *Introduce guidance to aid interpretation of the Declaration of Interests Form.*

At Appendix 11 is an example of guidance to accompany a Declaration of Interest Form to aid accurate completion of such forms.

- (4) *Update the execution clause on the Declaration of Interests form.*

At Appendix 12 is a model comprehensive execution clause, which includes reference to criminal sanctions pursuant to the Act.

- (5) *Determine a proportionate approach to introducing a revised Declaration of Interest Form and accompanying guidance.*

10. Procedure where Disclosable Pecuniary Interests arise

- 10.1 The duty to disclose and withdraw arises whenever a Councillor attends any meeting of the Council, a Committee or Sub-committee, or of the Executive, and is aware that he/she has a DPI in any matter being considered at the meeting. It applies even if the Councillor would be absent from that part of the meeting where the matter in question is under consideration.
- 10.2 Where these conditions are met, the Councillor must disclose the interest to the meeting (i.e. declare the existence and nature of the interest). The Councillor does not have to make such a disclosure if he/she has already registered the DPI although in practice in the interests of transparency other Members make such a public declaration.
- 10.3 Where the Councillor does make a disclosure of a DPI not on the register, he/she must then notify it to the Monitoring Officer within the next 28 days, so that it can go on the Register of Interests.
- 10.4 If a Councillor has a DPI in any matter, he/she must not participate:
- (a) in any discussion of the matter at the meeting. The Act does not define “discussion”, this precludes making representations;
 - (b) in any vote on the matter,
- unless he/she has obtained a dispensation allowing him/her to speak and/or vote.
- 10.5 Failure to comply with the requirements described in paragraphs 10.2, 10.3 or

10.4 above becomes a criminal offence, rather than leading to sanctions.

- 10.6 The Council's Code of Conduct must make appropriate provisions for disclosure and withdrawal in respect of interests other than DPIs.

Disclosure and Withdrawal in respect of matters to be determined by a lead councillor

- 10.8 Matters can be decided by the Leader or an executive councillor acting under the scheme of delegation to Executive Councillors. The Act provides that, when a Councillor becomes aware that they will have to deal with a matter and that they have a DPI in that matter:

- (a) unless the DPI is already entered in the register of interests or is subject to a pending notification, they have 28 days to notify the Monitoring Officer that they have such a DPI; and
- (b) they must take no action in respect of that matter other than to refer it another person or body to take the decision.

Recommendation

- (1) *Determine whether appropriate guidance and procedures are in place to address the process for withdrawal where DPI's arise.*

The model Code of Conduct at Appendix 1 contains appropriate procedures relating to withdrawal where a DPI arises.

11. Dispensations

- 11.1 The Act made significant changes to the provisions on dispensations.

- 11.2 A dispensation can be granted in the following circumstances:

- (a) that so many Members of the decision-making body have DPIs in a matter that it would impede the transaction of the business. (In practice this means that the decision-making body would be inquorate as a result);
- (b) that, without the dispensation, the representation of different political groups on the body transacting the business would be so upset as to alter the outcome of any vote on the matter;
- (c) that the authority considers that the dispensation is in the interests of persons living in its area;
- (d) that, without a dispensation, no member of the Executive would be able to participate on a particular item of business; or

- (e) that the authority considers that it is otherwise appropriate to grant a dispensation.
- 11.3 Any grant of a dispensation must specify how long it lasts for, up to a maximum of four years.
- 11.4 The Localism Act gives discretion for this power to be delegated to Standards Committee or a Sub-Committee, or to the Monitoring Officer. The circumstances described in (a) and (d) in paragraph 11.2 above are objective, and many Councils have delegated dispensations on these grounds to the Monitoring Officer, thus enabling dispensations to be granted “at the door of the meeting”. In practice this can be very useful. The circumstances described in (b), (c) and (e) of paragraph 11.2 are rather more subjective and so it may be appropriate that the discretion to grant dispensations on these grounds remains with Standards Committee (possibly after consultation with the Independent Person).
- 11.5 Parish Councils are responsible for determining requests for a dispensation by a Parish Councillor, and not the Council.

Recommendation

- (1) *Review the current procedure relating to the grant of dispensations.*

The model Code of Conduct at Appendix 1 contains appropriate procedures relating to the grant of dispensations.

At Appendix 13 is a model Dispensation Form for completion by a Member requesting a dispensation.

- (2) *Review the guidance provided to Parish Councils relating to the grant of dispensations.*

At Appendix 14 is an example guide to Parish Councils regarding the grant of dispensations.

12. Bias and Predetermination

- 12.1 The Act addressed the common law position regarding predetermination. The Act provides, in essence, that “*a decision maker is not to have..... a closed mind when making the decision..... just because the decision maker had previously done anything that directly or indirectly indicated what view the decision maker took..... or might take in relation to that matter.....*”
- 12.2 The Act essentially abolished the concept of pre-determination. The fact that a Councillor may have campaigned for or against a proposal is not in itself to be taken as proof that they are not open-minded.
- 12.3 However, a Councillor on a decision making Committee must still have an open mind when the Councillor comes to the meeting, so that all the relevant

considerations presented to the meeting can be taken into account. While Councillors can feel less constrained about, say voting at a Town or Parish Council Meeting before the matter comes to a District Council, Councillors should, nevertheless, avoid doing or saying something before decision making meeting takes place that shows that they have already – and finally – made up their minds on the issue.

- 12.4 Thus, before a meeting, Councillors may legitimately be publically pre-disposed. However, at the decision making meeting, Councillors must carefully consider all the evidence that is put before them and must be prepared to modify or change their initial view in the light of the arguments and evidence perceived. They must make their final decision at the meeting with an open mind based on all the evidence.
- 12.5 Decisions taken by Councillors with pre-determined views are vulnerable to legal challenge, which, if successful, could in turn lead to a breach of the Code of Conduct.

Recommendation

- (1) *Review guidance and training provided to Members regarding bias and predetermination.*

At Appendix 15 is a short note prepared for Members on bias and predetermination.

- (2) *Consider the inclusion in the Code of Conduct of an advisory note regarding pre-determination.*

The model Code of Conduct at Appendix 1 contains an advisory note regarding pre-determination.

13. Other matters arising as a result of this Review

As part of this review, other recommendations have emerged within the jurisdiction of this Committee:

- (1) *The adoption of a flow chart and guide to explain the complex procedure of making a complaint.*

At Appendix 16 is an example of a flowchart to summarise the procedure of making a complaint regarding a Member.

At Appendix 17 is a guide for the public to making such a complaint.

- (2) *Update the Complaint Form to make it clear that the complaint will be shared with the Independent Person, the Subject Councillor, Group Leader (if relevant) and the Parish or Town Clerk (if relevant).*

At Appendix 18 is an example form of wording regarding the disclosure of the complaint form to those outlined above.

- (3) *Update the Officers' Code of Conduct and specifically include the Principles of Public Life;*
- (4) *In the interests of consistency, if the Monitoring Officer Protocol is to be contained within the constitution then Protocols associated with the Head of Paid service and Chief Finance Officer should be included.*
- (5) *Review the Member/Officer Protocol:*
- (6) *Consider including details regarding Member Gifts and Hospitality in the Code of Conduct.*

The model Code of Conduct at Appendix 1 contains details regarding Gifts and Hospitality.

- (7) *Review the status of the Personal Interests Form.*
- (8) *Review consistency between the Code of Conduct and Code of Good Practice for Planning so as to ensure any amendments adopted following this review.*
- (9) *Review the terms of reference of the Standards Committee should the review outlined in this report be undertaken.*

14. Conclusions

14.1 If the Committee are minded to update policy, procedure and approach following this report and provided the model documentation appended to this report is generally approved then a comprehensive update should not be unduly onerous.

14.2 Such a comprehensive update should focus on the following key areas:

- Adopting a Code of Conduct that amalgamates all key obligations and interests, ensuring the process for registration, disclosure, sensitive interests and dispensation are clear.
- Updating the Complaint Form, and introducing guidance to the public on the process, ensuring transparency on the range of sanctions available.
- Updating the Procedure on Receipt of Complaint, including the ability to resolve complaints informally and the need for an appeal procedure.
- Updating the Procedure for Investigating a Complaint.
- Updating the Hearing Procedure Process.
- Updating the Register of Interest Form.
- Introducing Protocols with the Police and the Independent Persons.