

Report of the City Solicitor to the meeting of Standards Committee to be held on 20th June 2012

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Subject:

Establishment of New Standards Regime post implementation of the provisions of the Localism Act 2011.

Summary statement:

Members of Standards Committee are asked to consider proposed arrangements for the Standards Regime post the implementation of the provisions of the Localism Act 2011. In particular Members are asked to consider the establishment of a new Member's Code of Conduct and the arrangements for the investigations of breaches of the Code.

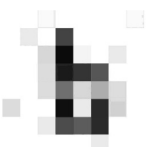
Members are asked to make recommendations to the meeting of the Corporate Governance and Audit Committee on 29th June 2012 for further recommendation to Full Council on 10 July 2012.

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Suzan Hemingway, Assistant Director Corporate Services (City Solicitor)



1. Summary

- 1.1 Members of Standards Committee are asked to consider proposed arrangements for the Standards Regime post the implementation of the provisions of the Localism Act 2011. In particular Members are asked to consider the establishment of a new Member's Code of Conduct and the arrangements for the investigations of breaches of the Code.

Members are asked to make recommendations to the meeting of the Corporate Governance and Audit Committee on 29th June 2012 for further recommendation to Full Council on 10 July 2012.

2. Background

- 2.1 The Localism Act 2011 includes changes to the ethical framework and standards regime for Local Government. The changes remove the existing Member's Code of Conduct arrangements and allow Council's to adopt their own arrangements although the Council is required to have a Code of Conduct and local arrangements for the investigation of allegations of a breach of the Code.
- 2.2 In addition matters relating to the disclosure and registration of Members' interests are covered by statutory regulation and do not form part of the voluntary Code of Conduct. Members are however still required to make a declaration of their interests and to disclose a pecuniary interest when matters are discussed at meetings of Council and its sub-committees.
- 2.3 The provisions of the Localism Act 2011 in relation to the standards regime are functions of Council which is given a new duty to promote and maintain high standards of conduct by Councillors and Co-opted Members. However there is no further guidance as to how this duty is to be fulfilled.
- 2.4 However because of the duty to promote and maintain high standards of conduct there also continues to be a statutory requirement for the Council to have a Standards Committee which has to have the following general functions:
- Promotion and maintaining high standards of conduct by Members and co-opted Members of the Authority;
 - Assisting Members and Co-opted Members of the Authority to observe the Authority's Code of Conduct.

and the following specific functions:

- Advising the Authority on the adoption or revision of a Code of Conduct;
- Monitoring the operation of the Authority's Code of Conduct;
- Advising, training or arranging to train Members and Co-opted Members of the Authority on matters relating to the Authority's Code of Conduct.

The Council may also arrange for the Standards Committee to exercise such other functions as it considers appropriate.

- 2.5 Following the implementation of the Localism Act there are no longer any specific provisions governing persons to be selected to be appointed as a Co-opted Member. Independent and Parish Council representatives can no longer be voting Members of Standards Committee as there is no legal authority for them to have voting member status.
- 2.6 However, under the new legislation the Council remains responsible for administering complaints in relation to the failure to comply with the Codes of Conduct of Town and Parish Councils in its District. In addition there is a requirement to have an Independent Person to advise both the Member who is the subject of a complaint and to give a view to the Standards Committee regarding a complaint made. For these reasons it is considered appropriate to co-opt onto the Standards Committee two Parish Council representatives and the appointed Independent Person to ensure that the Standards Committee has access to advice and assistance from these parties.
- 2.7 There are no specific provisions governing how persons are to be selected to be appointed to be Co-opted Members. In the past, the Council has sought nominations from the Parish Council Liaison Committee to be Parish Council representatives on Standards Committee. It is suggested that to provide advice to Standards Committee, the Parish Council Liaison Committee is asked to provide two nominees to continue with this role.
- 2.8 With regard to the Independent Person the Localism Act does contain some provisions regarding those persons able to undertake this role. Specifically the Independent Person must not be a relative or a close friend of a Member or Officer of the Council or of a Town and Parish Council served by the Standards Committee.
- 2.9 It was initially thought that existing Independent Members of the Standards Committee could not undertake the role of the Independent Person due to the specific provision of sections 27 of the Localism Act 2011. However the Regulations published on 6 June 2012 have effectively amended this provision of the statute and do allow existing Independent Members to undertake the role of the Independent Person. It is therefore suggested that one of the existing Independent Members be asked to continue as the Independent Person to fulfil this role and ensure appropriate advice can be given at all times.
- 2.10 In addition Council will need to appoint a Chair of the Standards Committee. Prior to the Localism Act 2011 the Chair was required to be one of the Independent Members of the Standards Committee. However, since the Independent Member can only be co-opted non-voting Member the Chair must be selected from an elected Member of Council. The present constitution of the Standards Committee is four Labour Members, two Conservative Members and one Liberal Democrat. It is a matter for Council to appoint the Chair from the membership of the Committee.

3. Establishment of a new Code of Conduct for Members

- 3.1 There continues to be a statutory requirement for the Council to adopt a Code of Conduct for Members. This has to be a decision of the Council, it cannot be delegated. The powers of the Secretary of State to prescribe a Code of Conduct have been removed.
- 3.2 The contents of the new Code of Conduct which will apply to Members, only when they are acting in an official capacity, have to be consistent with the seven “Nolan” principles in public life:
- Selflessness, integrity, objectivity, accountability, openness, honesty and leadership
- 3.3 Subject to this requirement Council must consider what is to be included in the Code of Conduct. The Council can decide whether to amend the existing Code of Conduct or adopt a new Code of Conduct. Much work has been done nationally to produce a more simplified version of the Code which meets the principles set out in the Localism Act but is not overly complicated and is written in a manner that both Members and the public can understand. At Appendix A is a proposed draft Code of Conduct which meets the legislative requirements and provides a framework for promoting appropriate standards of conduct. Members are asked to consider the draft document or either approve or suggest any amendments.

4. Arrangements for the investigation of allegations about breach of the Code of Conduct

- 4.1 The Council has a duty to put in place arrangements under which it can investigate and take a decision on a written allegation of a breach of the Code of Conduct. Before taking a decision the Council is required to seek and take into account the views of the “independent person”. The Member whose conduct is the subject of the allegation may also seek the views of the independent person. The only sanctions which the Council would have available if an allegation is proven will be to either sanction a Member, publicise the finding or remove a Member from Committees of Council. The Localism Act 2011 gives no explicit powers to undertake investigations or to conduct hearing. So there is no power to require access to documents or require Members or Officers to attend interviews and no power to require a Member to attend a hearing.
- 4.2 The Council is also under a duty to use its arrangements to deal with allegations that a Town or Parish Councillor within its District has failed to comply with their Code of Conduct. However it will be the Town or Parish Council that will ultimately determine any sanction to be imposed.
- 4.3 At Appendix B is a proposed procedure for dealing with complaints that is a simplified approach to establishing the position of all parties and allowing the Authority through its Standards Committee to come to a view on whether the

complaint is proven and whether a sanction is appropriate. Members are asked to consider the attached procedure and either approve it for recommendation to Corporate Governance and Audit Committee and onto Full Council or suggest further amendments.

5. Application to Parish Councils

- 5.1 Members are asked to note that a Parish Council is also a relevant authority for the purposes of the Localism Act 2011 and will be under the new duty to promote and maintain high standards of conduct by its Councillors and Co-opted Members. A Town/Parish Council will be required to adopt a new Code of Conduct for Members and this can be the Code of Conduct of its principal Council although they may wish to adopt their own arrangements. A Town/Parish Council is not required to have its own arrangements for investigation of allegations of breaches of the Code as these have to be dealt with by the principal Council under its arrangements (Appendix B). It will however fall to the Parish Council to determine what action will be taken if the principal Council determines that the allegation is proven. The Town/Parish Council will have to seek advice from the Independent Person in reaching their decision regarding sanction.

6. Member Training

- 6.1 The City Solicitor is in discussion with the Member Training Officer to set up a series of training sessions in September for all members of Council on the new Code of Conduct and on the procedure for dealing with complaints. These sessions will be on different days and times and will include a Saturday morning to ensure that as far as possible they are accessible to all members. Members and Clerks of Town and Parish Councils will also be invited to attend.

7. Financial and Resource Appraisal

- 7.1 The issues raised in this report do not have any direct financial consequences.

9. Legal Appraisal

- 9.1 The provisions set out in this report are to ensure that the Council meets the legislative requirements of the Localism Act 2011 and the regulations made thereunder.

9. Other implications

- 9.1 There are no trade union, equal rights, sustainability, community safety, Human Rights Act implications arising from this report.

10. Not for publication documents

10.1 None.

11. Recommendations

It is recommended to Council that:

- 11.1 A Chair of Standards Committee be appointed from the elected members on the Committee.
- 11.2 The Parish Council Liaison Committee be asked to nominate 2 Parish Councillors to be co-opted non-voting members of the Standards Committee.
- 11.3 One of the existing Independent Members of Standards Committee be appointed as the Independent Person.
- 11.4 The Independent Person be appointed as a co-opted non-voting member of the Standards Committee.
- 11.5 The new Code of Conduct as set out in Appendix A to this report be adopted.
- 11.6 The Procedure for considering complaints alleging failure to comply with the Code of Conduct as set out in Appendix B to this report be adopted.
- 11.7 The City Solicitor be given delegated authority in consultation with the Leader of Council to make such amendments to the Constitution as are necessary to implement the decisions of Council.

12. Reason for the Recommendations

- 12.1 To ensure that the Council has a robust ethical framework within which Members can operate and is compliant with the requirements of the Localism Act 2011.

13. Appendices

Appendix 1 – Proposed Member's Code of Conduct

Appendix 2 – Proposed procedure for considering complaints alleging failure to comply with Member's Code of Conduct

City of Bradford Metropolitan District Council Draft Members' Code of Conduct

This Code applies to elected Members and voting co-opted Members of City of Bradford Metropolitan District Council in all aspects of their public life. This means that the Council expects Members to follow this Code when they are conducting the work of the Council, representing the Council on any external organisation, and otherwise acting in their official capacity. The Code of Conduct does not apply to what Members do in their purely private and personal lives.

Part One - Standards of Conduct

You must have regard to, and act in accordance with, the following standards of conduct:

1. **Selflessness**

You should serve only in the public interest, and should never improperly confer an advantage or disadvantage on any person, organisation or group, or any other third party.

2. **Honesty and Integrity**

You should not place yourself in situations where your honesty and integrity may reasonably be questioned, you should not behave improperly and should avoid the appearance of such behaviour.

3. **Objectivity**

You must make decisions based on the information before you, having had regard to any professional advice provided to you and in accordance with your view of the public interest.

You should make decisions on merit, this includes when making appointments, awarding contracts, or recommending individuals for awards or other recognition.

4. **Accountability**

You are accountable to the public for your decisions and actions and the manner in which you carry out your duties. You must co-operate fully and honestly with any scrutiny appropriate to your office.

You should not undertake any action which would bring the Council, your position, or the position of Members generally, into disrepute.

5. **Openness**

You must be as open as possible about your actions and those of the authority, and should be prepared to give reasons for those actions.

6. **Leadership**

You must promote and maintain high standards of conduct by supporting these principles by leadership and by example, and should act in a way that secures or preserves the confidence of others.

You must have due regard to the impartiality and integrity of the authority's statutory officers and its other employees.

Part Two – Registration and disclosure of interests

Registration of Interests

7. Within 28 days of your election or co-option, you must notify the Monitoring Officer of any 'disclosable pecuniary interests' which you have at that time
8. Where you are re-elected or re-appointed, notification is only required of any new disclosable pecuniary interests within 28 days of your election or co-option.
9. You must keep your Register of Interests entry up to date by notifying the Monitoring Officer of any changes to your disclosable pecuniary interests within 28 days of the change occurring, or you becoming aware of the change.
10. A 'disclosable pecuniary interest' is an interest defined in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 set out in the table below.

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by a member of a relevant authority in carrying out duties as a member, or towards the election expenses of a member of a relevant authority.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992⁽¹⁾.</p>
Contracts	<p>Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority—</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is

⁽¹⁾ 1992 c. 52.

- within the area of the relevant authority.
- Licences** Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
- Corporate tenancies** Any tenancy where (to the member of the relevant authority's knowledge)—
 (a) the landlord is the relevant authority; and
 (b) the tenant is a body in which the relevant person has a beneficial interest.
- Securities** Any beneficial interest in securities of a body where—
 (a) that body (to the member of the relevant authority's knowledge) has a place of business or land in the area of the relevant authority; and
 (b) either—
 (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
 (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
11. A pecuniary interest is a 'disclosable pecuniary interest' in relation to you if it is of a type described above, and either:
- (a) it is an interest of yourself, or
 - (b) it is an interest of -
 - (i) your spouse or civil partner,
 - (ii) a person with whom you are living as husband and wife, or
 - (iii) a person with whom you are living as if they were civil partners, and the you are aware that that other person has the interest.
12. You are also required to notify the Monitoring Officer of any gifts or hospitality with and estimated value of at least [£50] which you receive in your role as a member of Council. You must inform the Monitoring Office of any such gifts of hospitality within 28 days of receiving them so that the details can be entered into the Register of Interests.

Sensitive interests

- 13 If the nature of an interest is such that you and the Monitoring Officer consider that disclosure of the details of the interest could lead to you, or a person connected with you, being subject to violence or intimidation, the interest must not be included in any published version of the Register of Interests, or be entered into any copy of the register that is made available for public inspection.

Disclosure of disclosable pecuniary interests at meetings

- 14 The following provisions apply if you are present at a meeting of the authority or of any committee, sub-committee, joint committee or joint sub-committee of the authority, and you are aware that you have a disclosable pecuniary interest in a matter to be considered, or being considered, at the meeting.
- 15 If the interest is not entered in the authority's Register of Interests, you must disclose the interest to the meeting (unless the interest is a sensitive interest).
- 16 If the interest is not entered in the authority's Register of Interests and is not the subject of a pending notification, you must notify the Monitoring Officer of the interest before the end of 28 days beginning with the date of the disclosure.
- 17 Where the interest does appear in the Register of Interests, you must bring the interest to the attention of the meeting (unless the interest is a sensitive interest).
- 18 You may not:
- (a) participate, or participate further, in any discussion of the matter at the meeting,
 - (b) participate in any vote, or further vote, taken on the matter at the meeting (unless the Member has requested and been granted a relevant dispensation by the Standards and Conduct Committee), or
 - (c) remain in the room during the discussion or vote on the matter.
- 19 Where you have a disclosable pecuniary interest in a matter to be considered at a meeting, you may attend the meeting but only for the purposes of making representations, answering questions or giving evidence relating to the matter, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise. Once you have finished, or the meeting decides you have finished, you must leave the room and may not remain in the room during the discussion or vote on the matter.

Disclosure of other interests at meetings

- 20 Where you are present at a meeting of the authority, or any committee, sub-committee, joint committee or joint sub-committee of the authority, and identify any other interests which you feel should be declared in the public interest, such interests may be declared to the meeting.
- 21 In such circumstances you must consider whether your continued participation in the matter relating to your interest would be reasonable in the circumstances,

particularly if the interest may give rise to a perception of a conflict of interests in the matter under discussion.

Allegations of a Failure to Comply with Code of Conduct

- 22 All complaints alleging a failure to comply with this Code will be considered in accordance with a procedure agreed by full Council.

Appendix B

Draft Procedure for considering complaints alleging a failure to comply with the Members' Code of Conduct within the area of City of Bradford Metropolitan District Council.

Introduction

1. This procedure should be used to deal with complaints submitted under the Members' Code of Conduct adopted by City of Bradford Metropolitan District Council and the Parish and Town Councils in the District area.
2. The Members' Code of Conduct applies to elected Members and voting co-opted members when they are acting in that capacity. Complaints which relate to a failure to comply with the rules about 'Disclosable Pecuniary Interests' should be directed to the West Yorkshire Police for their consideration. Complaints about a potential breach of the general obligations should be submitted to the Monitoring Officer for consideration.
3. The Monitoring Officer may nominate another officer of suitable experience and seniority to carry out any of the functions listed in this procedure.

Stage 1 - Initial assessment by the Monitoring Officer

4. Complaints must be submitted in writing, must provide substantiated information, and should outline what form of resolution the complainant is seeking. Otherwise the Monitoring Officer should ask the complainant to resubmit their complaint. Ideally the complainant will use the correct complaints form to submit their complaint, but other written complaints will be accepted so long as they contain the relevant information.
5. The Monitoring Officer will consider the complaint and make a decision as to whether it will be treated as a valid complaint or not.
6. The following types of complaint will not be considered as 'valid complaints' under this procedure:
 - a. Complaints which are submitted anonymously
 - b. Complaints which do not identify a subject Member;
 - c. Complaints which relate to a Member's personal or private life;
 - d. Complaints concerning a failure to respond to a request from a

constituent or other individual;

- e. Complaints which relate to the alleged actions of employees of the Council or non-voting co-optees;
 - f. Complaints which relate to a decision of an employee or a Committee;
 - g. Complaints which relate to a person who is no longer a Member of the Council or which refer to alleged incidents before the person became a Member of the Council;
 - h. Complaints which refer to alleged incidents which happened so long ago that there would be little benefit in taking action now;
 - i. Complaints regarding alleged behaviour which has already been the subject of an investigation or some form of action;
 - j. Complaints which relate to an alleged failure to comply with the rules regarding Disclosable Pecuniary Interests.
7. Complaints which contain a request for the complainant's identity to be withheld may be considered to be 'valid complaints', although the complainant's identity will only be withheld in exceptional circumstances. If the Monitoring Officer does not consider it appropriate to withhold the complainant's identity, the complainant will be given the opportunity to withdraw their complaint before it proceeds to the next stage. Anonymous complaints which reveal potential fraud or corruption will be referred to Internal Audit for consideration under the Council's adopted Whistle blowing Policy
8. Complaints which relate to an alleged failure to comply with the rules regarding Disclosable Pecuniary Interests will be redirected to the West Yorkshire Police with the complainant's agreement.
9. In all cases where the complaint names a Member of a relevant authority, the Member will be notified of the complaint. If the Monitoring Officer decides that the complaint is 'invalid', this notification is made for information only.
10. If the complaint relates to an employee or is a service related issue, the Monitoring Officer will refer the complaint to the relevant service in order for them to respond to the complainant directly.
11. In any case where the Monitoring Officer decides that the complaint is 'invalid', they will write to the complainant explaining why their complaint

cannot be dealt with under this procedure. There is no appeal process for decisions taken by the Monitoring Officer at this stage.

Stage 2 - Informal resolution

12. If, following initial assessment, the Monitoring Officer decides that the complaint should be treated as a 'valid complaint' they will write to the complainant and explain that the matter is to be referred to the subject Member for them to provide a response to the complaint.
13. At the same time the Monitoring Officer will refer the matter to the subject Member and the relevant Group Whip for their consideration. In this correspondence the Monitoring Officer will provide the subject Member with a reasonable timescale within which to respond to the complaint (usually this will be 28 days), and will provide the subject Member with the contact details for the Independent Person.
14. If the subject Member is the Group Whip the complaint will be sent to the Group Leader. In the case of a Parish or Town Council without structured political groups a copy of the complaint will be sent to the Clerk of the Council.
15. The subject Member will be asked to consider whether he/she is prepared to propose an informal resolution of the complaint to be communicated to the complainant.
16. Types of informal resolution might include:
 - a. An explanation by the subject Member of the circumstances surrounding the complaint;
 - b. An apology from the subject Member;
 - c. An agreement from the subject Member to attend relevant training or to take part in a mentoring process;
 - d. Offering to engage in a process of mediation or conciliation between the subject Member and the complainant; or
 - e. Any other action capable of resolving the complaint.
17. Before deciding upon a course of action the subject Member may seek guidance from a Group Whip, the Independent Person, and/or the Monitoring Officer.

18. The Independent Person is available to the subject Member to give them advice on the severity of the complaint and what form of resolution they would consider appropriate. Providing such guidance will not prevent the Independent Person from giving a view to the Standards Committee about the complaint at a later stage.
19. The Monitoring Officer will inform the complainant of the response and any proposals for resolution of the complaint received from the subject Member and ascertain whether the complainant is able to agree with any proposals.
20. Once the Monitoring Officer has received details of the complainant's position regarding the response from the subject Member he/she will, in consultation with the Chair of the Standards Committee, determine whether the subject Member (or Group Whip) has appropriately addressed matters which have been raised by the complainant.
21. Where the subject Member has appropriately addressed the matters raised there will be no further action taken in respect of the complaint and the Monitoring Officer will notify both the complainant and the subject Member of this decision.
22. Where it has not been possible to appropriately address matters, the complaint will be referred to the Standards Committee for consideration. The Monitoring Officer will notify both the complainant and the subject Member of this decision.
23. There will be no appeal process for decisions taken by the Monitoring Officer and the Chair of the Standards Committee at this stage.

Stage 3 – Standards Committee

24. The Monitoring Officer will prepare a report for consideration by the Complaints Sub - Committee of the Standards Committee ("the Sub – Committee"). This report will include readily obtainable information (such as minutes of meetings or Clerk's notes), a summary of the complaint and the efforts made to resolve the matter informally.
25. The Monitoring Officer must arrange for a meeting of the Sub - Committee to be convened to consider the Monitoring Officer's report of the complaint. The Sub – Committee will consider the Monitoring Officer's report in private but the outcome of their deliberations will be reported to the next meeting of the Standards Committee.

26. The Sub-Committee will be made up of three Members of the Standards Committee, one of whom must be from the same political group as the subject Member (wherever possible), but not all of the Members will be from the same political group. The Chair will be elected from among the membership at the beginning of the meeting, but cannot be from the same political group as the subject Member.
24. The following people will also be invited to attend the Sub-Committee meeting:
 - a. The complainant;
 - b. The subject Member;
 - c. The Group Whip (if relevant); and
 - d. The Independent Person.
25. The Monitoring Officer will also attend the meeting in order to present their report.
26. After initial consideration of the Monitoring Officer's report, the Sub-Committee will take statements from the following parties (either in person or in written form if the person is unable to attend the meeting):
 - a. The complainant; and
 - b. The subject Member.
27. The Sub-Committee may also ask questions of anyone present at the meeting in order to reach a conclusion on the complaint.
28. Before reaching a final decision on the complaint, the Sub - Committee must seek, and take account of, the view of the Independent Person in relation to the complaint.
29. If the Sub-Committee is unable to reach a conclusion on the complaint on the basis of the information before it, it may adjourn the meeting and request that the Monitoring Officer seeks the further information required. However, when doing so the Sub-Committee should consider whether the information will be readily available to the Monitoring Officer.
30. Once the Sub-Committee is satisfied with the information before it, it must decide the following issues:
 - a. Whether the subject Member has failed to comply with the Members' Code of Conduct;
 - b. Whether further action is warranted; and
 - c. What form of action might be appropriate.

31. If the complaint relates to a Parish or Town Councillor the Sub-Committee will only make a decision regarding whether the subject Member has failed to comply with the relevant Members' Code of Conduct. This decision, and the reasons for it, will be communicated to the relevant Parish or Town Council in order for it to make a decision as to whether further action is warranted and what form of action would be appropriate.
32. In all other cases, if the Sub-Committee concludes that, on the balance of probabilities, the subject Member did not fail to comply with the Members' Code of Conduct, this will conclude the complaints process. In such cases no further action will be taken in respect of the complaint, although the Sub-Committee may still wish to consider making a recommendation to the authority with a view to promoting and maintaining high standards of conduct in general. Such recommendations may include proposed changes to internal procedures and practices or training for Members in general.
33. If the Sub-Committee concludes that, on the balance of probabilities, the subject Member has failed to comply with the Members' Code of Conduct, the Sub-Committee must go on to consider whether action should be recommended in respect of the subject Member, and what form of action might be appropriate.
34. The recommendations available to the Sub-Committee are limited to:
 - a. A formal letter to the subject Member from the Chair of the Standards Committee;
 - b. Formal censure by a motion of full Council; or
 - c. Removal by the authority of the Member from a relevant Committee(s) subject to statutory and constitutional requirements.
35. The Sub-Committee may make a recommendation in relation to one or more of the above sanctions to full Council, the Group Whip or the Chair of the Standards Committee. The Chair will confirm any such recommendations in writing within ten working days of the Sub-Committee meeting.
36. The Sub-Committee may also make general recommendations to the authority with a view to promoting and maintaining high standards of conduct within the authority. As stated above, such recommendations may include proposed changes to internal procedures and practices or training for Members in general. The Monitoring Officer will be responsible for

communicating such recommendations to the relevant Committee or officer for consideration.

37. Within ten working days of the meeting the Chair of the Sub-Committee will write to the complainant and the subject Member explaining the final decision of the Sub-Committee and detailing any recommendations made.
38. There will be no right of appeal against a decision of the Sub-Committee.