

**REPORT OF THE
MONITORING OFFICER
2010**

INTRODUCTION

This is the sixth Annual Report of the Monitoring Officer for the period November 2009 to November 2010. The purpose of the report is not only to provide an overview of the work of the Monitoring Officer in the past year, but also to provide an opportunity to review and learn from experience. This report therefore sets out the Monitoring Officer's statutory responsibilities and summarises how these duties have been discharged from the last Monitoring Officer's Report for the period November 2008 to November 2009. The Report also highlights the work of the Standards Committee.

1. RECOMMENDATIONS

That the Standards Committee and the Performance and Governance Committee comments on and notes the Monitoring Officer's Annual Report.

That the Full Council notes the Monitoring Officer's Annual Report.

2. THE ROLE OF THE MONITORING OFFICER

The role of the Monitoring Officer derives from the Local Government and Housing Act 1989. The Act requires local authorities to appoint a Monitoring Officer.

The Monitoring Officer has a broad role in ensuring the lawfulness and fairness of Council decision making, ensuring compliance with Codes and Protocols and promoting good governance and high ethical standards.

A Summary of the Monitoring Officer's Functions is as follows:

<u>Description</u>	<u>Source</u>
Report on contraventions or likely contraventions of any enactment or rule of law	Local Government and Housing Act 1989
Report on any maladministration or injustice where the Ombudsman has carried out an investigation	Local Government and Housing Act 1989
Appoint a Deputy	Local Government and Housing Act 1989
Establish and maintain the Register of Members' interests.	Local Government Act 2000
Report on sufficiency of resources.	Local Government and Housing Act 1989
Maintain the Constitution	The Constitution
Support the Standards Committee. Promote and maintain high standards of conduct.	Local Government Act 2000

<u>Description</u>	<u>Source</u>
Receive reports from Ethical Standards Officers and case Tribunals	Local Government Act 2000
Consulting with, supporting and advising the Head of Paid Service and Chief Finance Officer on issues of lawfulness and probity.	The Constitution
Legal Advisor to the Standards Committee when carrying out a local Determination Hearing.	Local Authorities (Code of Conduct) (Local Determination)(Amendment) Regulations 2003
Receive referrals from Ethical Standards Officers for local Investigations.	Local Authorities (Code of Conduct) (Local Determination)(Amendment) Regulations 2003
Advising the Standards Committee in relation to allegations of breaches of the Code of Conduct including carrying out local investigations and advising when matters are determined.	Standards Committee (England) Regulations 2008 and Guidance produced by Standards for England
Advise on whether executive decisions are within the Budget & Policy Framework.	The Constitution
Provide advice on vices issues, maladministration, financial impropriety, probity, Budget and Policy Framework issues to all members.	The Constitution
Advising on dispensations to Members regarding prejudicial interests.	The Standards Committee
Considering whether certain Information is exempt from disclosure under the Freedom of Information Act.	Freedom of Information Act 2000

3. THE CONSTITUTION

The Constitution sets out how the Council operates and how decisions are made. It sets out the procedures which are followed to ensure that these decisions are efficient, transparent and that those who make the decisions are accountable to local people. The Monitoring Officer is responsible for ensuring that the Constitution operates efficiently, is properly maintained and is adhered to.

3.1 Constitutional Review and Revision

Since the Constitution was re-written in 2007 many changes have taken place with the Constitution being continually updated.

The Association of Council Secretaries and Solicitors (Acses) is currently working to produce a new model Constitution which should help Councils to revise their existing Constitutions. It is recognised by Acses that much of the contents of the new model Constitution will depend on the contents of the Decentralisation and Localism Bill, having regard to the Government's intention to free up how local authorities make decisions. This may allow Councils to revert to the old committee system which may result in a complete repeal of the Local Government Act 2000 framework and a broad brush power to determine how decisions are made within each Local Authority.

3.2 Fitness for Purpose

The Constitution sets out in clear terms how the Council operates and how decisions are made. Some of these processes are required by law, while others are a matter for the Council to choose. The purpose of the Constitution is to:

- ensure that those responsible for decision making are clearly identifiable to local people and that they explain the reasons for decisions;
- support the active involvement of local people in local authority decision making;
- help Members represent local people more effectively;
- enable decisions to be taken efficiently and effectively; and
- hold decision makers to public account.

3.3 Managing the Constitution

Any significant changes to the Council's decision making arrangements and Committee structure need to be approved by full Council. The Council will monitor and review the operation of the Constitution to ensure that the aims and principles of the Constitution are given full effect.

4. LAWFULNESS AND MALADMINISTRATION

The Monitoring Officer is the Council's lead adviser on issues of lawfulness and the Council's powers and in consultation with the Head of Paid Service and the Chief Financial Officer advises on compliance with the Budget and Policy Framework. Part of this role involves monitoring Committee reports, agendas and decisions to ensure compliance with legislation and the Constitution. The Monitoring Officer ensures that agendas, reports and minutes of all Council meetings are made publicly available unless there is a reason for exemption under the Local Government Act 1972. In addition Portfolio Holder decisions are also made publicly available subject to the same caveat as are all planning and licensing decisions made by Officers. All such decisions can be viewed by members of the public through the Council's website: www.sevenoaks.gov.uk.

If the Monitoring Officer considers that any proposal, decision or omission would give rise to unlawfulness or if any decision or omission has given rise to maladministration she must report to the full Council or where appropriate the Cabinet after first consulting with the Head of Paid Service and Chief Financial Officer. Any proposal or decision that is subject to such a report cannot be implemented until the report has been considered.

The sound governance arrangements operated by the Council ensure that the power to report potentially unlawful decision making is rarely used and the Monitoring Officer has not had to issue such a report throughout 2009/10.

4.1 Reports from the Local Government Ombudsman

The annual letter for 2009/10 from the Local Government Ombudsman sets out a summary of the enquires and complaints received against the Authority and dealt with by his office over the year. These were as follows:

There were 15 enquires and complaints in total, three of which related to complaints that were deemed to be premature. The Ombudsman provided advice to three other enquirers and only nine complaints were forwarded to the Ombudsman's investigative team which was down from 12 the previous year.

When an investigation is complete the Ombudsman generally issues a report. However, this year the Ombudsman did not issue any reports against the Authority and none of the complaints resulted in local settlements being reached.

The average time taken by the Authority to reply to the Ombudsman's written enquiries was 25 days, which is well within the target time of 28 days. The Ombudsman commended the Council for this

5. GOOD GOVERNANCE

The Monitoring Officer has a pro-active role in ensuring good practice, good procedures and good governance. This involves promoting networking, collaboration and joined-up working practices and decision making as well as ensuring standing orders, codes of practice, procedures are kept under review and up to date. Collaborative working entails regular monthly liaison meetings with the three Statutory Officers, Heads of Service/Management Team as well as working in partnership with other departments to develop and disseminate policies and procedures. The work this year has enabled the Council to win a number of awards that include:

The Council's HERO scheme was awarded the Kent Housing Award for excellence in homelessness prevention in Kent. The scheme aims to help residents in Swanley, Sevenoaks and Edenbridge who are out of work and facing problems such as potential homelessness and debt.

The Council became the first local authority in the South East to be awarded the prestigious Investors in People Gold Standard and Champion Standard. The Council was also named as the best local authority employer in the UK as part of the Times 'Best Companies to Work For' survey.

The residents of the District helped the Council win a Green Apple Award presented by The Green Organisation in recognition of its wildlife friendly schemes.

The Council was also awarded the top Management Team award at this year's prestigious Local Government Chronicle (LGC) presentations. In a joint application with Tunbridge Wells Borough Council, Sevenoaks also made the final five in the LGC Equalities & Diversity category.

The Corporate Area Assessment which had been introduced in April 2009 was abolished by the government in May this year. However, up to the time of abolition this Council was named as one of the four highest performing Councils in England for Use of Resources.

6. THE ETHICAL FRAMEWORK AND WORK OF THE STANDARDS COMMITTEE

The Standards Committee comprises sixteen Members, six of whom are District Council Members, five Parish/Town Council Members and five Independent Members. Both the Chairman and Vice Chairman of the Committee are Independent Members.

The Standards Committee has a key role in facilitating and promoting the Ethical Framework and in promoting and maintaining high standards of conduct within the Authority. As well as policy development and implementation the Committee is also involved in advising Members including those within the Parish/Town Councils on propriety issues and applications for dispensations. The Standards Committee determine allegations of Member misconduct including Members from Parish/Town Councils. The maintenance of the Registers of Interests for the District as well as the Parish/Town Councils is the responsibility of the Monitoring Officer overseen by the Standards Committee.

The Local Assessment of Member Complaints was introduced on the 8th May 2008 and the Council was able to have a fully functioning system for local assessment in place to meet the government's deadline. The Local Assessment Sub-Committee and Review Sub-Committee of the Standards Committee can decide to refer a matter to the Monitoring Officer for Local Investigation and Determination. They can also direct the Monitoring Officer to undertake Other Action.

Examples of the Standards Committee's work during 2009/2010 is as follows:

- Annual Monitoring Officer's Report
- Appointment of Sub-Committees in relation to the Local Assessment of Member Complaints
- Satisfaction Survey on the Local Assessment Process
- Assessing complaints
- Training and Development sessions for the Committee, Members including Parish/Town Council Members including Clerks
- Developing the Forward Work Programme

- Considering the Future of the Standards Committee
- Carrying out conciliation
- Adopting and using the training material produced by Standards for England
- Publicity for the local assessment of Member Complaints
- Monitoring Member Complaints
- Monitoring Training
- Keeping a watching brief on the future of the ethical framework
- Advice given to Members including Parish/Town Council Members, Clerks and the Public on Code of Conduct matters.

6.1 Maintaining a Register of Member Interests

The Monitoring Officer is responsible for establishing and maintaining a Register of Member Interests for the District and Parish/Town Councils. Registers for Parish/Town Councils are held within the Elections and Land Charges Section of the Council. Registers of the District Council are held within the Democratic Services Section. With the introduction of the revised Code of Conduct gifts and hospitality worth £25 or over must now be included in the Register of Member Interests. This means that such gifts and hospitality are now a personal interest and must be declared at any meeting where a matter relating to that interest is discussed. The Standards Committee has produced guidance on the acceptance and registration of gifts and hospitality.

It is a requirement that Members' Register of Interest forms are made available for public inspection during normal office hours. On the 10th November 2009 Full Council agreed that District Council Members' Register of Interests should be made available online and this has now been implemented.

The Government announced in the Queen's Speech that the proposed Decentralisation and Localism bill will include proposals to 'abolish the Standards Board regime'. However, it is envisaged that Councillors will still have to register certain personal interests in a publicly available register which could include anything that could reasonably be regarded as likely to influence or affect their actions, conduct when on business for the authority or voting. The new legislation will make failing to register an interest, or deliberately seeking to mislead the public about an interest a criminal offence.

6.2 Code of Conduct for Employees

The Code is based on an original draft published by the IDeA and has been updated since being implemented in 2006. The Code forms part of the employers' terms and conditions of employment. The Code is well publicised on the Council's internal intranet and is introduced to employees through the induction process.

Under the Code employees must declare to their Directors any non-financial or financial interests that they or members of their family have which they consider could conflict with the Council's interests. Directors and the Chief Executive

declarations of non-financial or financial interests are declared to the Monitoring Officer.

All relationships of a business or private nature with external contractors, or potential contractors should be made known to the employees Head of Service and Director.

All hospitality received and given should be appropriate and necessary and must, wherever possible, have the prior sanction of the Head of Service or Director and must be recorded in the Hospitality book kept within Corporate Resources. There is a Protocol on Corruption, Gifts and Hospitality contained within the Staff Code of Conduct.

6.3 Whistle Blowing

A revised Whistle Blowing Policy for both Sevenoaks and Dartford Councils has been completed and was considered by the Performance and Governance Committee at Sevenoaks on the 16th November 2010.

The Policy sets out how to raise concerns within the organisations with employees encouraged in the first instance to raise concerns with their immediate manager or superior.

Concerns may be raised verbally or in writing and there is a dedicated telephone number which allows communication in confidence to the Audit and Fraud Team.

At Sevenoaks the Chief Executive has overall responsibility for the maintenance and operation of the policy. A record of concerns raised and the outcomes (but in a form which does not endanger confidentiality) is maintained and reported (in such a way as to preserve confidentiality), to the relevant committees of the Councils.

The Policy is intended to provide an avenue within the Council to raise concerns. However, if it is felt that it is right to take the matter outside the Council contact points are given as follows:

- Public Concern at Work
- The Audit Commission
- Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- Relevant voluntary organisation
- The police
- Trade Union representative
- Local Government Ombudsman

In the last calendar year one concern has been raised under the existing Whistle Blowing Policy which is currently being looked into.

6.4 Human Resources Strategy and Workforce Plan

A Human Resources Strategy and Workforce Plan is available on the Council's internal intranet which incorporates many policies, strategies and procedures. These are regularly reviewed in line with legislative changes.

6.5 The Future of Standards for England and the Standards Framework

The Government's Programme for Government' following the May elections contained the commitment to "abolish the Standards Board regime". Primary legislation is needed to abolish the Standards for England, and it is expected that the provisions for this will be included in the planned Decentralisation and Localism Bill which is due to be presented in late 2010 with Royal Assent anticipated between July and October 2011. This is likely to lead to final closure of the organisation sometime between 31st December 2011 and 31st March 2012. However, until such time as the relevant legislation is passed, the statutory framework remains operative and Standards for England are continuing to support the work of local standards committees. As a result Councils are expected to continue with their statutory duties including the assessment of allegations.

6.6 Standards for England, Complaints and Determinations

The Monitoring Officer is responsible for establishing and maintaining an effective working relationship with Standards for England. The Monitoring Officer is also responsible for receiving reports from Ethical Standards Officers regarding investigations carried out by Standards for England into the conduct of Members. Such reports may need to be determined by the Council's Standards Committee.

The Standards Committee (England) Regulations 2008 came into force on 8th May 2008. The Regulations along with Guidance produced by Standards for England sets out the details of how the locally based system for the assessment of alleged complaints into breaches of the Code of Conduct would operate. The Assessment Sub-Committee and Review Sub-Committee of the Standards Committee can refer matters to the Monitoring Officer for Local Investigation and Determination or Other Action. In limited circumstances matters can be referred to Standards for England.

6.7 Allegations of Member Misconduct dealt with by the Assessment Sub-Committee of the Standards Committee between 1 December 2009 and 30 November 2010.

Total allegations made:	20
District Councillors	3
Parish/Town Councillors	17
Complaints in which no action was taken	14
Complaints where other action taken	4
Referred cases sent for local investigation and determination	3

Cases originally referred for local investigation and determination but taken back to the Assessment Sub-Committee under s.16 of the Standards Committee (England) Regulations 2008 which resulted in a decision of no further action	1
Cases sent for Review	10

Although the number of Member misconduct allegations has increased this year from 17 last year to 20 this year it is important to note that 9 of the allegations came from one Member of a Parish Council against other Members of the Parish Council. Although, no action was taken in relation to these 9 cases, even upon Review, unofficially training and conciliation took place. These 9 cases sparked an allegation against the original complainant from a Member of the Parish Council. In this case there was a recommendation of no action.

There were five cases brought by a member of the public against various members of a Parish Council. Two of these cases were investigated and on determination it was agreed that there was no breach of the Code of Conduct and this was in line with the Investigating Officer's reports. In another two cases there was a recommendation for other action which comprised training for the subject member and the training was successfully completed. In the final case within this batch of cases the decision was no further action. This particular case is now the subject of an Ombudsman complaint.

Two of the cases involved a Town Council and in both cases other action was recommended. The other action was as follows:-

- The Monitoring Officer to request the Subject Member to review his current Register of Interests Form with particular reference to category (f) this being "the address or other description of any land in which I have a beneficial interest and to confirm to her that he himself has no beneficial interest in the property referred to by the complainant". This recommendation has been successfully completed.
- The Town Council to engage at their expense an external independent mediator/conciliator to try and address the issues between the two members and across the Town Council if necessary.

One of the three remaining cases comprised a case brought by a member of the public against a Parish Council Member which resulted in no action. This left two cases one of which was against a District Council Member from a member of the public which again resulted in no action and the third case was against a District Council Member by a member of staff. It was initially decided that this complaint was to be investigated but following successful conciliation the matter was taken back to the Assessment Sub Committee who decided on no further action.

In June 2010 the Standards for England informed Monitoring Officers that they would no longer be collecting quarterly statistical information returns on the number of Member misconduct complaints or annual returns which required 57 questions to be

answered surrounding how local standards committees went about their work programme.

6.8 Local Assessment of Complaints into Member Misconduct

The local procedure for assessing complaints into allegations of Member misconduct is publicised via local newspapers and “In shape People”, and a web page created with an on line complaint form together with criteria for local assessment.

All Members on the Sevenoaks Standards Committee have been given extensive training on the processes. The training sessions have been well received with some of the Independent Members of the Council’s Standards Committee cascading such training to the Kent and Medway Independent Standards Committee Members’ Liaison Group.

Monthly meetings of the Assessment Sub-Committee are set in place so that Member misconduct complaints can be considered in a timely fashion.

6.9 Local Investigation & Determination Procedures for Complaints regarding the Conduct of Members

If a local assessment of Member misconduct results in a decision to investigate the Monitoring Officer may delegate other Council Officers to perform the function of investigation into the conduct of Councillors of the District and Parish/Town Councils. In appropriate cases, the Monitoring Officer will appoint the Deputy Monitoring Officer to undertake the investigation, but in other cases it may be appropriate to appoint an outside investigator, which could involve borrowing from another authority and there is a Protocol for Mutual Assistance by the Kent Monitoring Officers.

The Monitoring Officer may require any Council Officer to provide a statement, answer questions or supply information to assist in the conduct of an investigation and require Councillors to provide such statements, answer questions or supply information.

7. CORPORATE COMPLIANCE WITH LEGISLATION

Legal updates including details of new legislation are circulated by the Legal Team to relevant Officers within the organisation. Those Officers then circulate legal updates including new legislation to Members when they consider this to be appropriate.

The Legal Department continues to produce a Legal Section newsletter on a quarterly basis which contains legal updates on issues that Members and staff may find interesting, helpful and relevant. The guide supplements their usual frequent updates which are sent to specific people about their area of work.

Information will be provided to members on the new Decentralisation and Localism Bill once this becomes available.

All Cabinet reports and the various committee reports have a compulsory heading in which the author has to consider Legal Implications and Human Rights issues, and if there are likely to be such implications the report is to be sent to the Legal Team for relevant advice.

8. EQUALITIES

As a community leader, service provider and employer Sevenoaks District Council is committed to eliminating discrimination on the grounds of race, disability, gender, age, religion and belief and sexual orientation. This means respecting the different needs of the district's community and ensuring the Council, its contractors and its delivery partners deliver against our commitments. The Council's Annual Equality Report was approved by Cabinet on the 2nd September 2010.

9. SUPPORT TO COUNCIL, CABINET, SCRUTINY AND COMMITTEE MEETINGS

The distribution and publication of committee reports, agendas and decisions is central to meeting the requirements of a key deliverable. It is the Monitoring Officer's responsibility to oversee the process and ensure that these documents comply with statutory and constitutional requirements.

This includes:

- Distributing and publishing all agendas within five clear working days of the meeting taking place and ensuring that all agendas are compliant with the access to information rules and exempt information is marked up accordingly.
- Advertising public meetings five clear days before the meeting date.
- Ensuring that papers are made reasonably available to the public.
- Drafting minutes for publication within nine working days.
- Publishing a record of all decisions including key decisions taken by Cabinet within 48 hours (2 working days) after the meeting.
- Ensuring that petitions are handled in accordance with the Council's Constitution including e-petitioning.
- Ensuring that meetings are accessible.

10. Statutory Meetings Analysis

One of the explicit aims of the Local Government Act 2000 was to streamline the decision making process to allow Councils to focus on service delivery.

In 2009/10 the following were serviced:

Full Council Meetings (including 2 extraordinary meetings and 1 annual meeting)	8
Cabinet	12
Performance and Governance Committee	5
Electoral Arrangement Committee	1
Environment Select Committee	6
Services Select Committee	5

Social Affairs Select Committee	6
Modern Local Government Group	1
Development Control Committee	13
Standards Committee including one extra-ordinary meeting	4
Sevenoaks Joint Transportation Board	5
Licensing Committee	3

Other meetings serviced include 5 Licensing Committee hearings and 9 Assessment Sub-Committee and 4 Review Sub-Committee meetings of the Standards Committee

The volume of meetings represents a substantial commitment of both Councillors' and Officers' time and resources. It is of great importance that meetings constitute an effective use of time and resources; that they add value to corporate effectiveness and help in meeting the aims and objectives of the Constitution and the Community Plan.

The government has announced plans to allow Councils to return to the committee system if that is their preferred system of governance. The committee system was abolished by the Local Government Act 2000 which required all councils with a population of 85,000 or more to choose either an elected mayor and cabinet or a leader and cabinet. Prior to the 2000 Act, local authorities could take all decisions to council or delegate decision-making to committees, sub-committees, other authorities or officers.

10.1 The Forward Plan

The co-ordination and maintenance of the Forward Plan is central to meeting the requirements of good governance as it enhances open and transparent decision making.

In compliance with Access to Information Procedure rules and the Constitution, the Forward Plan sets out key decisions which the Council plans to take in the next four months. A key decision is one which would result in expenditure or savings in excess of 50,000 pounds or which is significant in terms of its effects on communities living or working in two or more wards. The Forward plan sets out the date/period within which the decision will be taken. The Forward Plan is published and updated on a monthly basis.

10.2 Call-In requests

There were no call-in requests within 2009/10.

10.3 Overview and Scrutiny

The Council has been developing successful and responsive overview and scrutiny. Some of the challenges in this area have been:

- the CCTV working group which was a short and sharp review

- the Recycling working group which was a more in-depth study

This year the Overview and Scrutiny Committees have been involved in the budget process, taking an early look at proposed savings and making recommendations to help the Council balance its budget.

Two Members attended a Kent Overview and Scrutiny Conference in November last year.

10.4 MEMBER TRAINING AND DEVELOPMENT

The Standards Committee oversees the provision of training to Members within the District and the Parish/Town Councils on the Code of Conduct. A training development programme for Members is also organised by the Democratic Services Team.

This year training has taken place in the following areas:

- Training for all Members on the Development Control Committee which took place on the 25th May 2010.
- An event whereby Members of the Development Control Committee could review the outcome of their decisions which took place on the 26th July 2010.
- Training on the new upgraded Democratic Services reporting system which took place on the 9th November 2010.

This year the Standards Committee has been concentrating on providing training and conciliation in relation to the Code of Conduct for those Parish and Town Councils who are in most need.

- Training took place for Hever Parish Council, West Kingsdown and Westerham Parish Council on the 3rd February 2010.
- A number of Officers within the District Council received training on the 24th February 2010.
- On the 4th March 2010 1-1 training took place for a Member of Hartley Parish Council who is also a District Councillor following a complaint that resulted in a recommendation of “other action”.
- Training took place for Chevening Parish Council on the 10th March 2010.
- On the 15th April 2010 additional training took place for West Kingsdown, Hartley and Kemsing Parish Council.
- On the 21st July 2010 training and conciliation took place for Brasted Parish Council following a large number of complaints.
- Unofficial expert conciliation has also been arranged this year between Officer and Member.

- Following an Assessment Sub Committee Hearing into a complaint from a Town Council there was a finding of “other action” that recommended expert conciliation. The Monitoring Officer will be following this matter up very shortly.

There are 30 Parish and Town Councils within the District of Sevenoaks and the Monitoring Officer with Members of the Standards Committee often undertake training and or conciliation out of hours.

Training feedback forms are an essential part of the arrangements for training and are evaluated by the Standards Committee. This year those that have undertaken the training have agreed or strongly agreed the following:

- That the objectives of the session were met
- Attending was worth the effort
- They learnt something new and useful that they could apply to their position as Councillor or Clerk
- They are likely to recommend the training session to others
- The course material was helpful and informative.

The Monitoring Officer employs an open door policy allowing Members to call in at any time to receive advice. This facility is extensively used by Members of the District, Town and Parish Councils to try to resolve issues at an early stage.

The Standards Committee works as a cohesive group to promote high standards across the whole district. The drive and enthusiasm of the Committee is reflected by the fact that the Independent Chairman now chairs the Kent Association of Independent Members which is helping to drive up standards across Kent.

11 CONCLUSION

The Monitoring Officer’s role in conjunction with the Standards Committee encompasses both proactive and reactive elements. The proactive role centres on raising standards, encouraging ethical behaviour, increasing awareness and utilisation of the elements of good governance and ensuring that robust procedures are in place.

The reactive role focuses on taking appropriate action to deal with issues and potential problems as they arise. The Monitoring Officer together with the Standards Committee’s effectiveness in this role is in turn dependent on effective systems and procedures being in place to identify problems and ensure that Members, Officers and Public are aware of appropriate channels to raise concerns.

Christine Nuttall
Monitoring Officer

