



**RHONDA CYNON TAF COUNTY BOROUGH COUNCIL**

**STANDARDS COMMITTEE**

**27 NOVEMBER 2020**

**PUBLIC SERVICES OMBUDSMAN FOR WALES – SUMMARY OF COMPLAINTS  
AGAINST MEMBERS – 1<sup>ST</sup> APRIL 2019 – 31<sup>ST</sup> MARCH 2020**

**REPORT OF THE MONITORING OFFICER**

**1. PURPOSE OF THE REPORT**

- 1.1 To provide Members with a summary of complaints made against Members and submitted to the Public Services Ombudsman for Wales (the ‘Ombudsman’) for the period 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2020.

**2. RECOMMENDATIONS**

- 2.1 To note the contents of the report.

**3. BACKGROUND AND DETAILS OF COMPLAINTS**

- 3.1 Members will note below the summary of anonymised complaints made against Members and submitted to the Ombudsman for the period 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2020:

Date Complaint Received by the Ombudsman	Body & Cllr	Nature of Complaint	Ombudsman Investigation Yes/No
19/9/19	Ynysybwl & Coed-Y-Cwm Community Council (Community Cllr)	<p>Mr X complained Cllr Y spoke to them in an aggressive manner and that they pushed Mr X in the chest causing them some pain.</p> <p>Ombudsman determined that at the time of the conduct Cllr Y was not acting as a Cllr but as a private individual. The Code of Conduct usually only applies when a member of a council is performing functions as a Cllr or seeking in some way to rely upon their status as a Cllr. The Code of Conduct only applies when a Cllr is acting as a private individual in very specific circumstances, which did not appear to apply in this case. The allegation that the Cllr pushed Mr X in the chest area could be considered as an</p>	No

		<p>assault, which is a criminal matter. That would be a matter for the Police to consider, not the Ombudsman. The Ombudsman wrote to Mr X requesting they provide him with any further information to support their allegation but did not receive anything further.</p> <p>Decision therefore was that there was no breach of the code of conduct by the Cllr as they did not appear to be acting in their capacity as one at the time of the incident.</p>	
11/3/20	Taff's Well & Nantgarw Community Council (Community Cllr)	<p>Cllr Y complained that Cllr D's conduct at a Council meeting amounted to bullying and harassing.</p> <p>As the Ombudsman was already in the process of investigating a similar complaint against Cllr D the events were be added to that investigation.</p>	Yes
29/1/20	Taff's Well & Nantgarw Community Council (Community Cllr)	<p>The complaint received by the Ombudsman suggested that a recorded decision of the Ethics Committee of a company recommended that a number of documents be referred to the Ombudsman with an allegation that Cllr X had breached the Code of Conduct on the grounds of "bullying and harassment.</p> <p>The papers did not indicate which provisions of the Code it was considered that Cllr X had breached. Moreover, as Cllr X was an officer of the Company it was unclear why that Cllr had not made a referral to the Monitoring Officer of the County Council if they felt they had breached the Code, in line with the Guidance issued by the Ombudsman, as opposed to referring to a committee of their own company and then seeking that the complainant pass on the information to the Ombudsman.</p> <p>The complainant subsequently stated that they had not in fact made a complaint and therefore the Ombudsman could not receive evidence in support of it.</p>	No
7/1/20	Taff's Well & Nantgarw Community Council (Community Cllr)	<p>Cllr T complained Cllr U stated they would release papers relating to the personal circumstances of Cllr T at a Council meeting.</p> <p>The Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned has breached the Code as alleged. Apart from the specific assertions the complainant provided two emails to support the complaint and to establish Cllr U's conduct towards Cllr T. Based on the limited information presented the Ombudsman could not identify a breach of the Code as alleged.</p>	No
17/9/19	Taff's Well & Nantgarw Community Council (Community	<p>Cllr G complained Cllr L breached the Protection from Harassment Act and the Data Protection Act by receiving or attempting to receive personal data from them.</p>	No

	Cllr)	<p>Cllr G did not confirm which specific paragraph of the Code they considered Cllr L may have broken. Whilst they referenced the general duty to uphold the law, this is one of the Principles rather than a section of the Code, although the individual sections of the Code are designed to support the implementation of the Principles.</p> <p>The Ombudsman considered paragraphs 4(b) show respect and consideration for others and (c) not use bullying behaviour or harass any person, may be relevant.</p> <p>Ombudsman was satisfied Cllr G was acting in their capacity as a Cllr when engaging in communications with Cllr L.</p> <p>The Ombudsman considered the matters which were alleged did not in fact constitute a breach of the Code.</p> <p>In the specific circumstances surrounding the matter the Ombudsman found it was not unreasonable for Cllr L (given their responsibilities) to be in possession of certain data and act in the way they acted in supporting the role of the Council's Clerk.</p>	
11/03/20	Taff's Well & Nantgarw Community Council (Community Cllr)	<p>Cllr K complained they were being bullied and harassed by Cllr W in relation to certain matters and threatening behaviour and comments made to/about them.</p> <p>The conduct about which Cllr K complained were determined to be very closely linked to events already under investigation in relation to a complaint against Cllr K.</p> <p>Ombudsman was not persuaded that Cllr W provided evidence which suggests that Cllr K's conduct warranted investigation and that the language used (either in emails or verbally) was capable of amounting to a breach of the Code which justified investigation.</p>	No
13/9/19	Taff's Well & Nantgarw Community Council (Community Cllr)	<p>Complaint into the following potential breaches of the Code currently being investigated by the Ombudsman in relation to Cllr B:</p> <p>4(c) - You must not use bullying behaviour or harass any person 7(a) - In your official capacity or otherwise you must not, use or attempt to use your position improperly to confer on or secure for yourself, or any other person , an advantage or create or avoid for yourself, or any other person, a disadvantage.</p> <p>9(a) - You must observe the law and your authority's rules governing the claiming of expenses and allowances in connection with your duties as a member.</p>	Yes (ongoing)

11/6/2019	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr Q alleged Cllr S made insulting, abusive and malicious comments about them and fellow members. They alleged that Cllr S made comments in a letter to a political group and as part of comments made on social media under a pseudonym.</p> <p>The Ombudsman considered the matters which were alleged did not in fact constitute a breach. They found it was not uncommon for elected members to say things about political opponents which others may consider to be rude or offensive and it was not the purpose of the Code of Conduct to inhibit free speech and the robust expression of political differences.</p> <p>The contents of the letter were found to amount to political comment. The criticism of opposition ideas and opinion is considered to be part of democratic debate and it is unlikely that such comments would ever be considered to be a breach of the Code. Furthermore, the Ombudsman says that "political" comments are not those simply made within council meetings and include comments members may generally make about their political opponents. Therefore, unless the comments are highly offensive or outrageous, it is unlikely that the Ombudsman will investigate complaints made in this context.</p> <p>Therefore the Ombudsman found the comments were not offensive or unreasonable and therefore no evidence of a breach was provided.</p>	
September & October 2019 (4 x complaints relating to same Cllr & incident investigated by Ombudsman as part of one investigation)	Llantwit Fardre Community Council (Community Cllr)	<p>Cllrs complained that Cllr O breached the Code of Conduct for members when they made several accusations against serving Community Cllrs during a Community Council meeting. They alleged that Cllr O then shared a written copy of their address, in which they accused Community Cllrs of bullying the former Clerk of the Community Council, with members of the press and public present.</p> <p>Any member of a relevant authority must observe the Code of Conduct whenever that member is acting in their official capacity. Members must not disclose confidential information or information which could reasonably be regarded as confidential unless they have consent or are required by law to do so. The Code applies to a member acting in both an official and personal capacity where those actions may bring the office of member or the authority into disrepute. Members should report to their authority's monitoring officer if they believe another member's conduct breaches the Code of Conduct. Members must not make vexatious, malicious or frivolous complaints against other members or anyone who works for their authority. Members must participate in</p>	Yes (discontinued)

		<p>meetings having had regard to any relevant advice provided by their authority's officers.</p> <p>The Ombudsman's investigation did not find any evidence to suggest that Cllr O disclosed confidential information during their address at the meeting. The relevant minutes of the meeting note that Cllr O referred to individuals by name and that their manner was "derogatory". The minutes also say that Cllr O was advised by the Chair and Acting Clerk that their actions were inappropriate. Cllr O continued to speak, referring to individuals by their positions within the Community Council, rather than by name. The minutes note that Cllr O was also advised by the Clerk that this was inappropriate, however they did not follow that advice. Cllr O's disregard for the Clerk's advice appears to have been in clear breach of paragraph 8(a) of the Code.</p> <p>Whilst Cllr O was entitled to raise their concerns about other members the Ombudsman did not consider that the full Council meeting, which was open to the public, was an appropriate forum for them to do so.</p> <p>The Ombudsman carefully considered Cllr O's written statement, which was distributed to those present at the meeting. In it they make several accusations about fellow Community Cllrs and calls for their resignation.</p> <p>Rather than airing their concerns in public Cllr O should have raised their concerns through the proper processes available for doing so. Raising such serious accusations in such a public forum when those being accused did not have a fair opportunity to respond could amount to a breach of paragraph 6(1)(a) of the Code of Conduct, in that they may have brought the Council into disrepute. This was borne out by the fact that many of the Cllrs contacted the Ombudsman to complain about the events at the meeting.</p> <p>When deciding whether to take further action in relation to these possible breaches of the Code of Conduct, the Ombudsman carefully considers whether it is in the public interest for him to do so.</p> <p>The Ombudsman was very concerned over recent months about the level of dispute between members of the Council and the number of referrals which were made to his office.</p> <p>The Ombudsman was appreciative of the visit undertaken by the Monitoring Officer and the</p>	
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		<p>Chair of the Council's Standards Committee when they met with the majority of the members of the Council in January to encourage better working relationships within the Council. A collective agreement was reached on taking a fresh approach on how to deal with situations where disagreement had previously escalated into personal attacks.</p> <p>As the events which are being considered as part of this investigation took place some months before the meeting with the Monitoring Officer and Chair of the Standards Committee, the Ombudsman did not consider it in the public interest to pursue the investigation. They considered it was in the public interest for the Council members to move forward developing positive working relationships in the spirit agreed at the meeting.</p> <p>The Ombudsman therefore determined not to take any further action in relation to this complaint.</p>	
22/1/20	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr Y complained Cllr H breached paras 4(b) and 6.1(a) of the Council's code of conduct. These sections of the code relate to showing respect and consideration for others and not to conduct themselves in a manner which could reasonably be regarded as bringing their office or authority into disrepute.</p> <p>The conduct amounted to wearing a 'bah humbug' Santa Hat during a meeting of the Council and that they behaved in a completely disinterested manner and at one point confessed to having read neither the agenda or the clerks report. They also sounded off a novelty horn/klaxon during the meeting.</p> <p>The Ombudsman did on the face of it, agree that the conduct potentially constituted a breach of the Code but were not sufficiently serious to warrant an investigation by the Ombudsman.</p> <p>The Ombudsman did however write to Cllr H to remind them of their responsibilities to behave in a professionally appropriate manner during Council meetings.</p>	No
3/10/19	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr B alleged Cllr D failed to address the bullying and harassment of staff, including a duty of care to protect staff from such behaviour and mismanaged the Council's funds. They alleged Cllr D bought their office into disrepute. The Ombudsman considers factors such as: whether the member has deliberately sought a personal gain at the public's expense for themselves or others, misused a position of trust, whether an investigation is required to maintain public confidence in elected members and whether an investigation is proportionate in</p>	No

		<p>the circumstances.</p> <p>The Ombudsman was not persuaded that the evidence provided was sufficient to demonstrate that Cllr D breached the Code of Conduct. Also matters relating to the Council's agenda items, and any notice of them, are a governance matter which are more appropriately considered by the Chair and Clerk in accordance with the Council's own internal procedures.</p>	
9/3/20	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr S alleged Cllr L in their role as Chairman of a committee, failed to provide clarity and answer their questions.</p> <p>The Ombudsman determined the complainant did not provided sufficient evidence to substantiate their complaint. The Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned has breached the Code.</p> <p>In view of the high number of Code complaints the Ombudsman's office was receiving from the Community Council the Ombudsman relayed his concerns that this office was continuing to receive a high number of complaints which do not warrant investigation in the public interest. This was despite advice received from the Monitoring Officer and assurances provided to him.</p> <p>A warning was also given that should the Ombudsman receive further complaints which do not meet the threshold for investigation, he will consider whether they are vexatious in nature and indicated he not hesitate to take action to investigate any possible breach of paragraph 6(1)(d) of the Code.</p>	No
22/10/19	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr E alleged Cllr G regularly showed a lack of interest, respect and courtesy during Council meetings particularly when speaking to younger Cllrs and was discourteous to other Cllrs.</p> <p>The Ombudsman determined that the complainant had not provided sufficient evidence to substantiate their complaint and that the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that a member concerned has breached the Code of Conduct. In any event, even if there were sufficient direct evidence to suggest that Cllr G had breached the Code of Conduct he did not consider that it was sufficiently serious to warrant investigation.</p> <p>It is not the purpose of the Code of Conduct to inhibit free speech and the robust expression of political differences but there is however a clear distinction between robustly engaging in debate and engaging in personal attacks on individuals.</p>	No

		<p>The Ombudsman was not persuaded that the conduct mentioned was so egregious as to amount to breach of the Code of Conduct.</p> <p>In any event, it appears from the information provided that the Chair addressed the issue at the time in accordance with your Council's procedure.</p>	
22/10/19	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr Z complained that Cllr J may have breached paragraphs 7(b)(i) and 7(b)(ii) of the Model Code of Conduct in relation to accounting software which it was alleged was purchased by Cllr Z without the sanction of the Council.</p> <p>This involves the consideration of a number of public interest factors such as: whether the member has deliberately sought a personal gain at the public expense for themselves or others or misused a position of trust, whether an investigation is required to maintain public confidence in elected members, and whether a referral is proportionate in the circumstances.</p> <p>Having reviewed the matter in accordance with the Ombudsman's public interest test, whilst the complaint raised potentially serious issues, given the accounting software cost the Community Council £4,000, the evidence indicated that Cllr J did not act to obtain the software solely on their own initiative.</p> <p>Furthermore, on the basis of the information the Ombudsman has received, there was no suggestion that Cllr J acted in any way to benefit themselves or anyone with whom they has a close relationship. The actions were deemed to have been taken in the interest of the Council as a whole to avoid the situation arising where the Council could not operate and pay its staff or suppliers.</p>	Yes (discontinued)
27/9/20 (3 identical complaints made by 3 Cllrs against another Cllr)	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr A complained about Cllr Z's behaviour against the previous Clerk and had ridiculed the Clerk's work in public meetings calling them 'rubbish' and behaving aggressively and intimidatingly towards them. They alleged a lack of respect was shown to them and that Cllr Z's actions bought the Community Council into disrepute.</p> <p>In respect of the allegation that Cllr Z's conduct related to comments against a member of Community Council staff, the Ombudsman said there were appropriate channels for expressing concerns about an officer's performance and to do so in a public meeting or forum, for instance, is not acceptable.</p> <p>That said, such issues should be addressed by members through the correct forum and matters relating to the performance of a staff member are generally considered to be part of the</p>	No



		<p>function of the Community Council as a whole and as a corporate body, as opposed to being the sole responsibility of individual members or any obligation under the Code of Conduct.</p> <p>It was determined the breach of the code of conduct which was alleged was not sufficiently serious to warrant investigation. Furthermore, based on the evidence provided, even if a breach of the Code of Conduct were proven, it was not sufficiently serious that a Standards Committee would be likely to consider or impose a sanction on Cllr Z.</p>	
27/9/19 (complaint made about two Cllrs)	Llantwit Fardre Community Council (Community Cllrs)	<p>Cllr F raised a concern about Cllrs J and K regarding the Council's proposed Children's Christmas Fayre and Old Age Christmas Dinner tasked to its Leisure Sub-Committee ("the Sub-Committee") for organisation and to bring its proposals back to Full Council for consideration. Both Cllrs were members of the Sub-Committee. Cllr F complained that Cllrs J and K failed to follow corporate governance or due process.</p> <p>Specifically the complainant alleged Cllrs J and K failed to declare interests as a member of a Sports Club's Committee at both meetings. The complainant also questioned Cllr J and K's impartiality because of an additional connection to the Sports Club.</p> <p>The Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned has breached the Code, as alleged. No evidence was provided to demonstrate each element complained about such as minutes of any meeting(s) referred to in the complaint, to demonstrate which members attended which meetings, the context in which the member attended, whether any interests were declared, and the nature of that interest. There must be some evidence that the alleged personal interest would likely conflict with Cllr J and K's obligations under the Code, and significantly impact their ability to make a decision in the public interest.</p> <p>This is an objective test, and the evidential proof required is on a balance of probabilities. A personal interest must be more than a simple connection within the local community or by being nominated to that other public role by virtue of being a member of the Council.</p>	No
11/10/19 complaint made about three Cllrs)	Llantwit Fardre Community Council (Community Cllr)	<p>Mr X alleged Cllr Y had a personal and prejudicial interest in matters involving a Sports Club because they were a member of it. Cllr Y had taken part in discussions and voted at full Council meetings and its Leisure &amp; Amenities Committee meetings where the Sports Club was debated as a venue for the Christmas events. They also complained that Cllr Y took part and</p>	No

		<p>voted at a Council meeting where a funding request for an event was discussed, voted on and subsidised.</p> <p>Personal and prejudicial interests are contained in paragraphs 10 to 14 of the Code. Briefly, personal interests relate to council issues or matters under discussion at meetings, where the issue under discussion has some link to the member/the members close personal associate. Where such an interest exists, members are required to declare that personal interest and to disclose the nature of that interest, before the matter is discussed or, as soon as it becomes apparent to the member, at the relevant council meeting. However, a member can remain in the room, participate in the discussion and vote on the issue unless the personal interest is considered as prejudicial in accordance with paragraph 11 of the Code of Conduct.</p> <p>Simply put, a personal interest only becomes prejudicial where an informed independent observer could conclude that the personal interest would significantly influence the member's vote or decision. There must be some evidence of a direct link between the alleged personal interest which would likely conflict with Cllr Y' obligations under the Code and significantly impact their ability to make a decision in the public interest. The evidential proof required is on a balance of probabilities.</p> <p>There was no evidence provided by the complainant that Cllr Y could have breached the Code as alleged.</p> <p>Paragraph 10(2)(c)(v) of the Code provides that elected members should consider that they have a personal interest in a matter being considered by their Authority if a decision might reasonably be regarded as affecting a registered society in which they hold a position of general control or management. Paragraph 11 of the Code confirms that where an elected member has a personal interest, they must disclose orally to the meeting the existence and nature of that interest. Under Paragraph 12(1), where a personal interest exists, members also have a prejudicial interest if a member of the public with knowledge of the relevant facts would reasonably consider that interest is likely to prejudice their judgement of the public interest. However, Paragraph 12(2)(a)(iii) confirms that elected members will not be regarded as having a prejudicial interest in any business where it relates to a body to which they have been <b>nominated</b> by their Authority.</p> <p>From the evidence provided, Cllr Y was</p>	
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		<p>nominated by the Council to represent it on the Sports Club Committee. As such Cllr Y may have had a personal interest to declare at Council meetings where the Sports Club was discussed, either as a venue or a funding request, for event. In the Ombudsman's view, it followed that failing to declare that interest during any Council meeting in which they were present and where this matter was considered, could be considered, technically, as a breach of the Code. However, given that Cllr Y was nominated to the Sports Club Committee by the Council, the exemption referred to above would apply in the context of a prejudicial interest. Accordingly, Cllr Y would have been entitled to remain in the room and take part in the discussions and vote.</p> <p>In conclusion, even if this breach were to be proven, it would not be in the public interest to investigate because there is no evidence that Cllr Y or anyone closely linked to them received any benefit from, or suffered a disadvantage to others, from this role.</p>	
17/12/19	Llantwit Fardre Community Council (Community Cllr)	<p>Mr X complained Cllr M posted politically motivated and factually incorrect comments on social media relating to members of the public which suggested that they had voting rights within the Council.</p> <p>Based on the information available, it appeared to the Ombudsman that the breach of the Code of Conduct which was alleged was not sufficiently serious to warrant investigation. The comments provided with the complaint (which do not include the author's name but accepted by Cllr M as their comments) appear to relate to a local event with criticism directed at elected members of the Council and members of the public. Whilst directing certain criticism towards members of the public was ill-advised, it is not the purpose of the Code of Conduct to inhibit free speech and the robust expression of political differences between elected members. That Ombudsman did remind Cllr X of how their conduct may be perceived by the public.</p>	No
14/10/20	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr F complained Cllr L publicly humiliated and bullied the Clerk during Council meetings. They alleged the Clerk resigned from their role due to Cllr Ls actions. A letter from the Clerk was produced as evidence to support the complaint.</p> <p>The Ombudsman determined that the conduct may amount to a breach of the Code of Conduct. However even if the alleged breach were to be proven, an investigation would not be in the public interest. The allegation that the Clerk resigned as a direct consequence of Cllr L's actions is serious. However the Ombudsman said it is his role is to consider ethical standards</p>	No

		<p>met by members it is not his role to resolve employment disputes.</p> <p>As the events described in the complaint took place some months before the meeting with the Monitoring Officer and Chair of the Standards Committee they did not consider it is now in the public interest to pursue this investigation further.</p>	
10/2/20	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr D complained Cllr K's actions amounted to maladministration. They complained that Cllr K failed to answer your questions or provide clarity about the role of the Clerk in respect of including personal opinion in minutes.</p> <p>Having considered the information available the Ombudsman found the complainant had not provided sufficient evidence to substantiate the complaint, and the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned has breached the code.</p> <p>In any event Cllr D indicated in their complaint that Cllr K's actions amounted to maladministration, that is that he failed to follow Community Council's policies and/or procedures. Therefore, it appeared to them that the matters which were alleged did not in fact constitute a breach of the Code because maladministration is a separate matter to an elected members obligation set out in the Code and does not apply to the actions of the Council as a whole or the conduct of its officers/employees e.g. the Clerk. Additionally, an elected member cannot make a maladministration complaint about the authority they are elected to.</p>	No
22/1/20	Llantwit Fardre Community Council (Community Cllr)	<p>Cllr F complained about Cllr T's comments at the start of a meeting which they considered brought their role and office into disrepute.</p> <p>Cllr T complained to the meeting about social media comments that had been made against them and demanded an explanation from a Cllr whom he accused of making those comments.</p> <p>Cllr F also suggested that Cllr T highlighted that one of the Cllrs had a complaint registered against them by the Public Services Ombudsman for Wales. This was done with members of the public present and breached the confidentiality requirements associated with an investigation by the Ombudsman.</p> <p>Having considered the above and evidence presented the Ombudsman did not find a breach of the Code of Conduct in that they did not appear to bring the Cllr or their office into</p>	No

		<p>disrepute.</p> <p>With regard to the comments made about the member being subject to an investigation by this office the Ombudsman would expect the details pertaining to, and substance of, any investigation to be kept private, the mere revelation of the existence of such an investigation does not amount to a breach of confidence which in turn amounts to a breach of the code.</p>	
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**4. LEGAL IMPLICATIONS**

4.1 There are no legal implications arising from this report.

**5. CONSULTATION**

5.1 There are no consultation implications arising from this report.

**6. EQUALITY AND DIVERSITY IMPLICATIONS**

6.1 There are no equality and diversity implications arising from this report.

**7. FINANCIAL IMPLICATIONS**

7.1 There are no financial implications arising from this report.

**LOCAL GOVERNMENT ACT 1972**

**AS AMENDED BY**

**THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**STANDARDS COMMITTEE**

**27 NOVEMBER 2020**

**REPORT OF THE MONITORING OFFICER**

**Background Papers:** Freestanding matter

**Contact:** Mr. Andy Wilkins (Director of Legal Services & Monitoring Officer)  
– 01443 424105