

**AUDIT COMMITTEE**  
**30 APRIL 2025**

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**ETHICAL GOVERNANCE AND MEMBER STANDARDS – UPDATE REPORT**

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**SUMMARY REPORT**

**Purpose of the Report**

1. To update members on issues relevant to member standards and ethical governance.

**Summary**

2. The report gives members an update of information about issues relevant to member standards since matters were reported to the Committee in November 2024.
3. Also set out in the report are a number of datasets of ethical indicators to assist in monitoring the ethical health of the Council. By reviewing these indicators it is hoped to be able to identify any unusual or significant trends or changes in the volume of data recorded for the relevant period that might provide an alert to any deterioration in the ethical health of the authority.
4. Commentary is included for some data sets to give analysis and explanation for some of the more notable variations. There are no particular issues of concern that have been identified from reviewing the data.

**Recommendation**

5. Members are asked to note the information presented and to comment as appropriate.

**Reasons**

6. By having information of this nature:
  - (a) Members will be assisted to perform their role.
  - (b) Members will be able to get a better picture of the ethical health of the authority.

**Amy Wennington**  
**Assistant Director, Law and Governance**  
**Monitoring Officer**

**Background Papers**

None – save as mentioned in the text

Amy Wennington: Extension 5490

Council Plan	Strong ethical governance arrangements and standards are important in the delivery of the Council Plan
Addressing inequalities	There is no direct impact
Tackling Climate Change	There is no direct impact
Efficient and effective use of resources	There is no direct impact
Health and Wellbeing	There is no direct health and wellbeing impact
S17 Crime and Disorder	There are no specific issues which relate to crime and disorder
Wards Affected	All wards are affected equally
Groups Affected	All groups are affected equally
Budget and Policy Framework	This report does not affect the budget or policy framework
Key Decision	This is not a key decision
Urgent Decision	This is not an urgent decision
Impact on Looked After Children and Care Leavers	This report has no impact on Looked After Children or Care Leavers

## MAIN REPORT

### Update on matters relevant to Ethical Governance and Member Standards

#### Committee on Standards in Public Life

7. The Committee on Standards in Public Life (CSPL) advises the Prime Minister, national and local government about ethical standards in public life in England. It monitors, conducts broad inquiries and reports on issues relating to the standards of conduct of all public office holders.
8. In 2024 the CSPL announced that it would be carrying out a review looking at accountability within public bodies and the importance of acting on early warning signs of failure or concern. On 25 March 2025 the CSPL published their report: [Recognising and Responding to Early Warning Signs in Public Sector Bodies](#).
9. The report includes examples of how organisations have sought to identify and respond to the early warning signs of emerging problems and identifies 20 points for reflection to assist leaders to consider whether improvements can be made to their organisations' processes and culture, and which employees can use to hold their leaders to account.
10. On 28 March 2025 the Prime Minister wrote to the Chair of the CSPL welcoming the report and stating: "...restoring trust in politics is the great test of our era, and upholding the Seven Nolan Principles of Public Life is crucial to the success of this Government." The Prime Minister's letter can be viewed [here](#).
11. For more general information about the CSPL and the wider recent work of the CSPL – this can be viewed from the following link [Committee on Standards in Public Life - GOV.UK \(www.gov.uk\)](#)

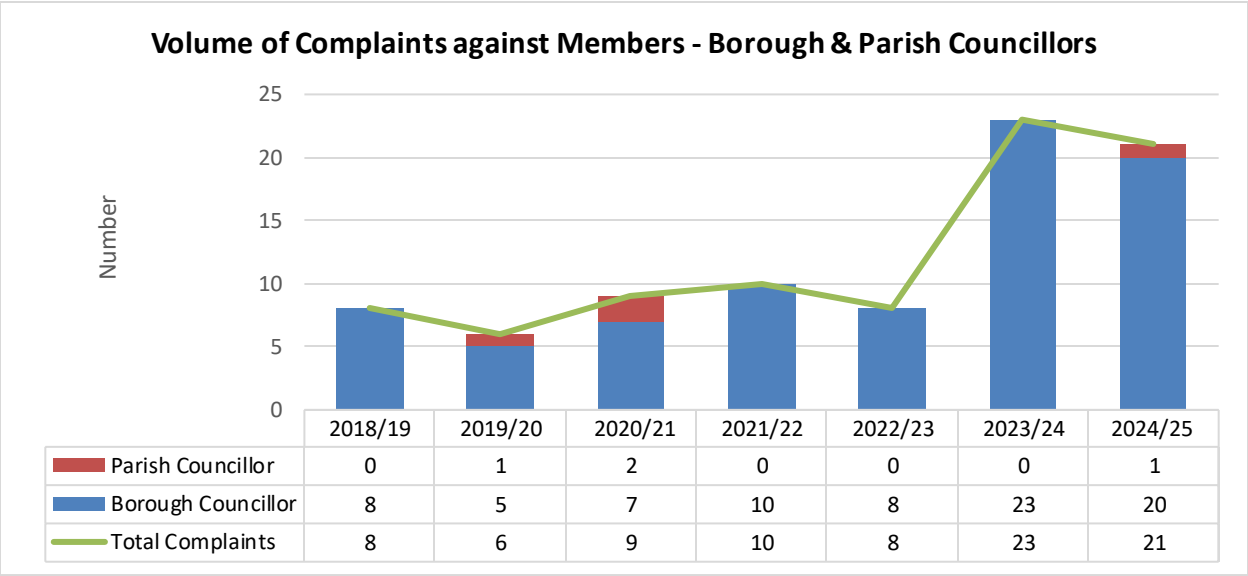
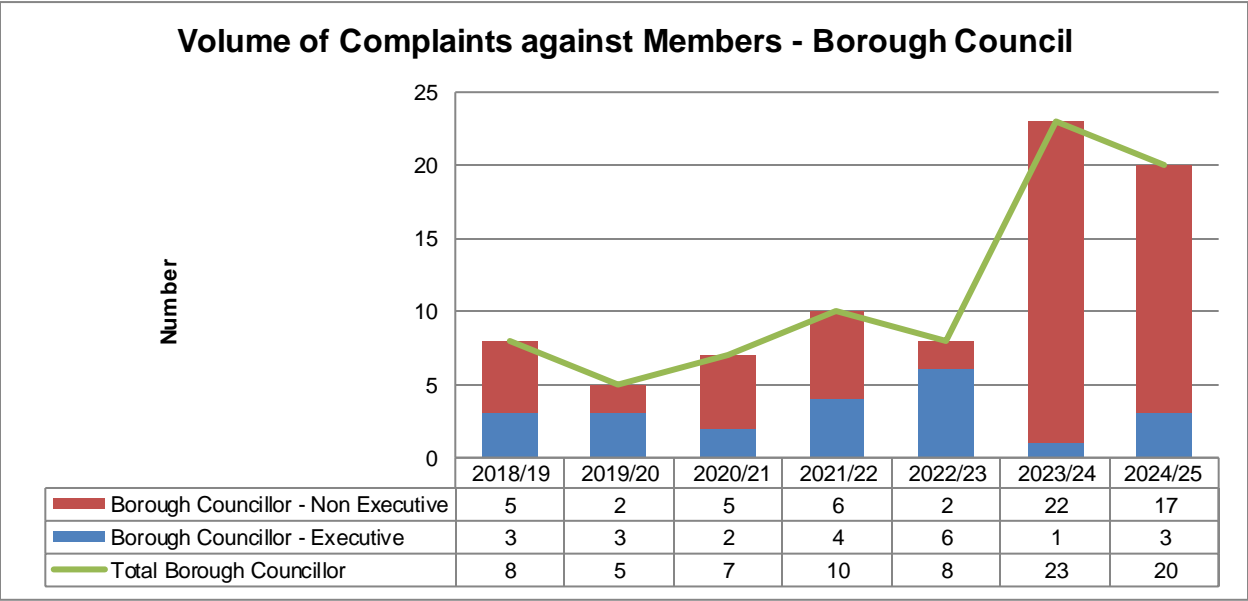
#### Code of Conduct

12. The Monitoring Officer will provide refresher training on the Members Code of Conduct in late Summer/early Autumn 2025.
13. Register of Interests reminders to members were sent in early April and any website updating that may be required in consequence is in hand.

#### Ethical Indicators

14. Set out in **Appendix 1** are a range of data sets that it is hoped will assist in monitoring the ethical health of the Council. By reviewing the indicators, it will be possible to identify any unusual or significant changes in the volume of data recorded for the relevant period that might provide an alert to any deterioration in the ethical health of the authority.
15. A more detailed breakdown of Member complaints received and outcomes can be found at **Appendix 2**.
16. Member's observations about this information are invited.

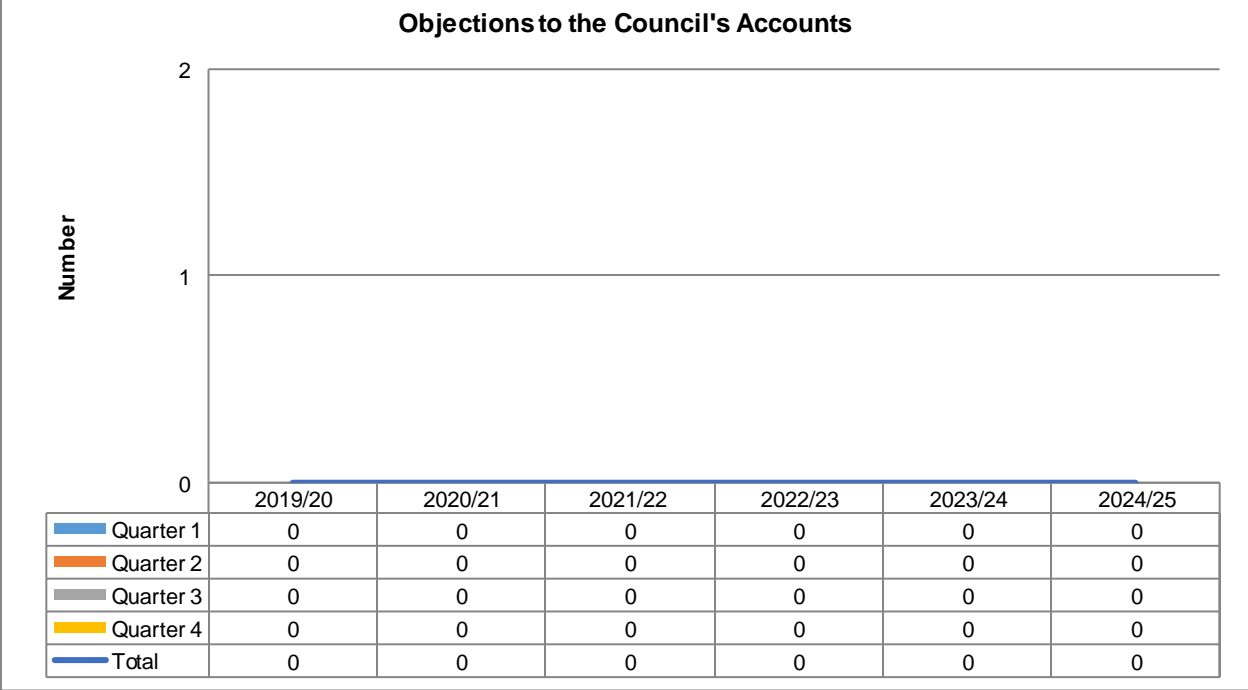
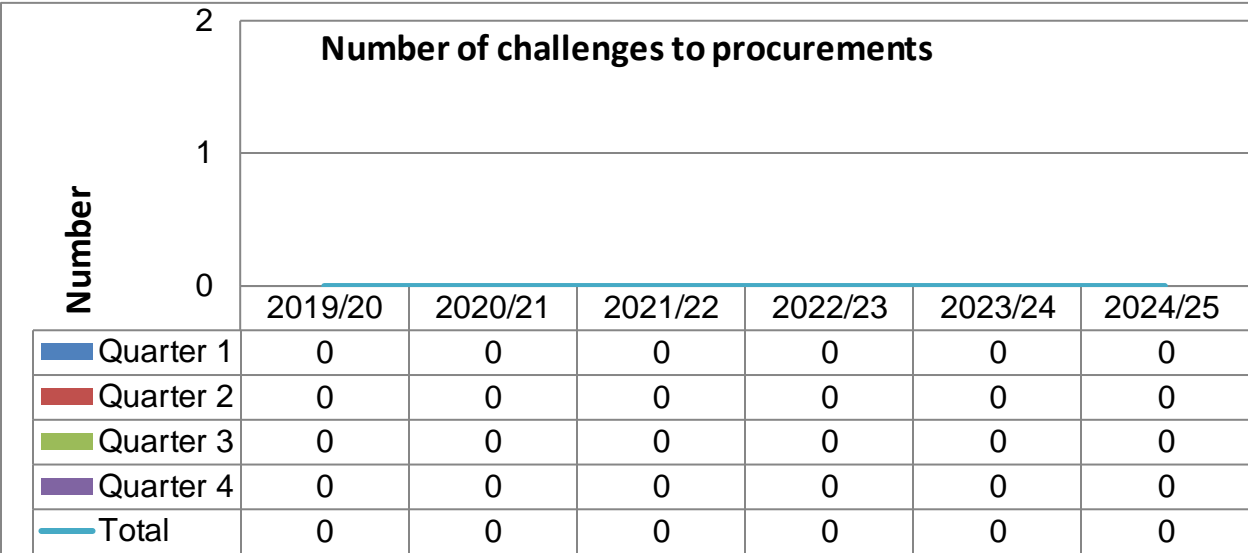
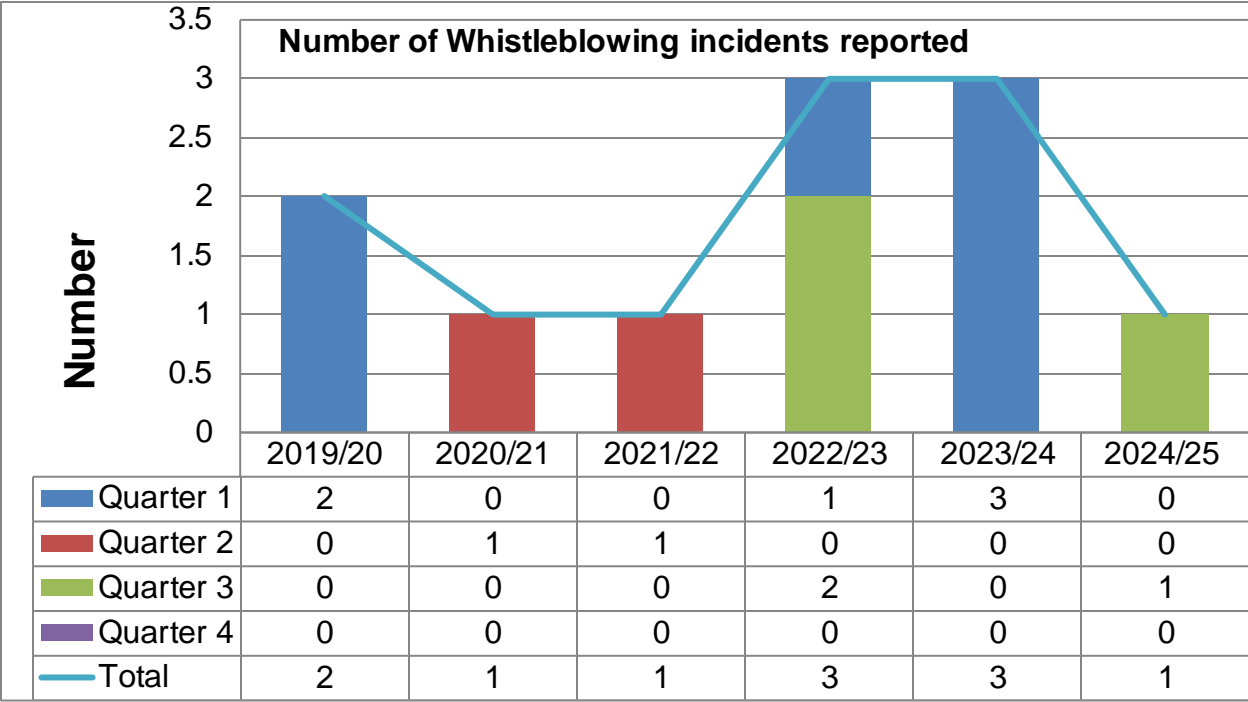
Member Complaints

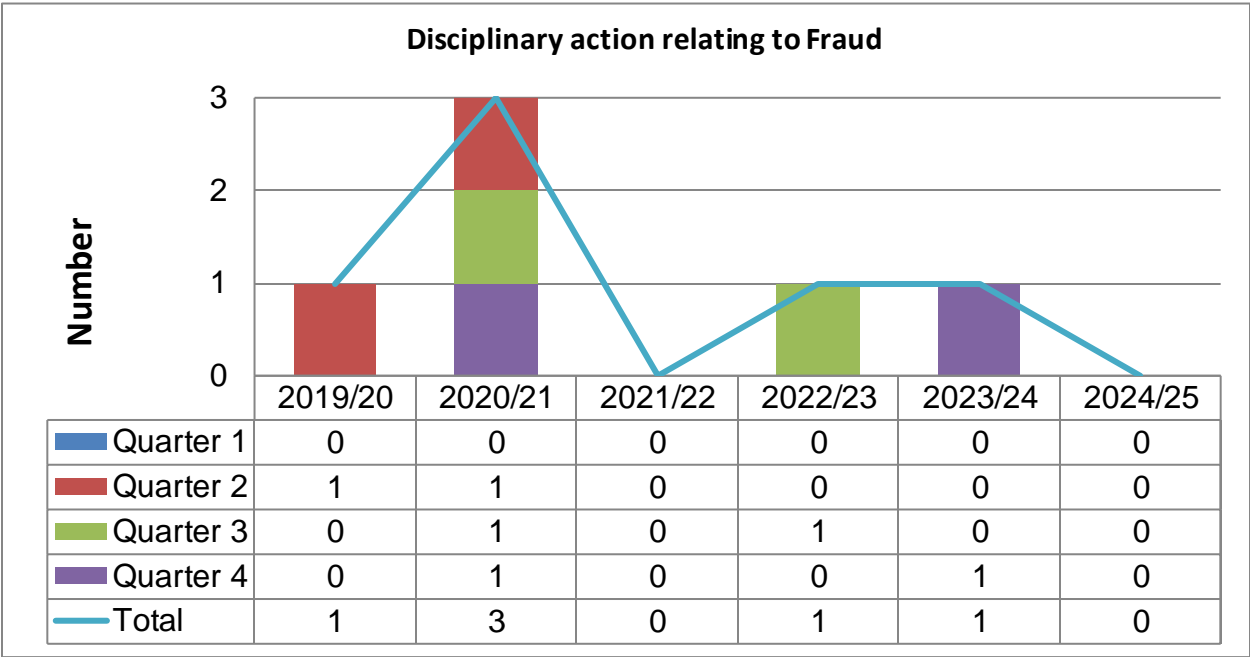
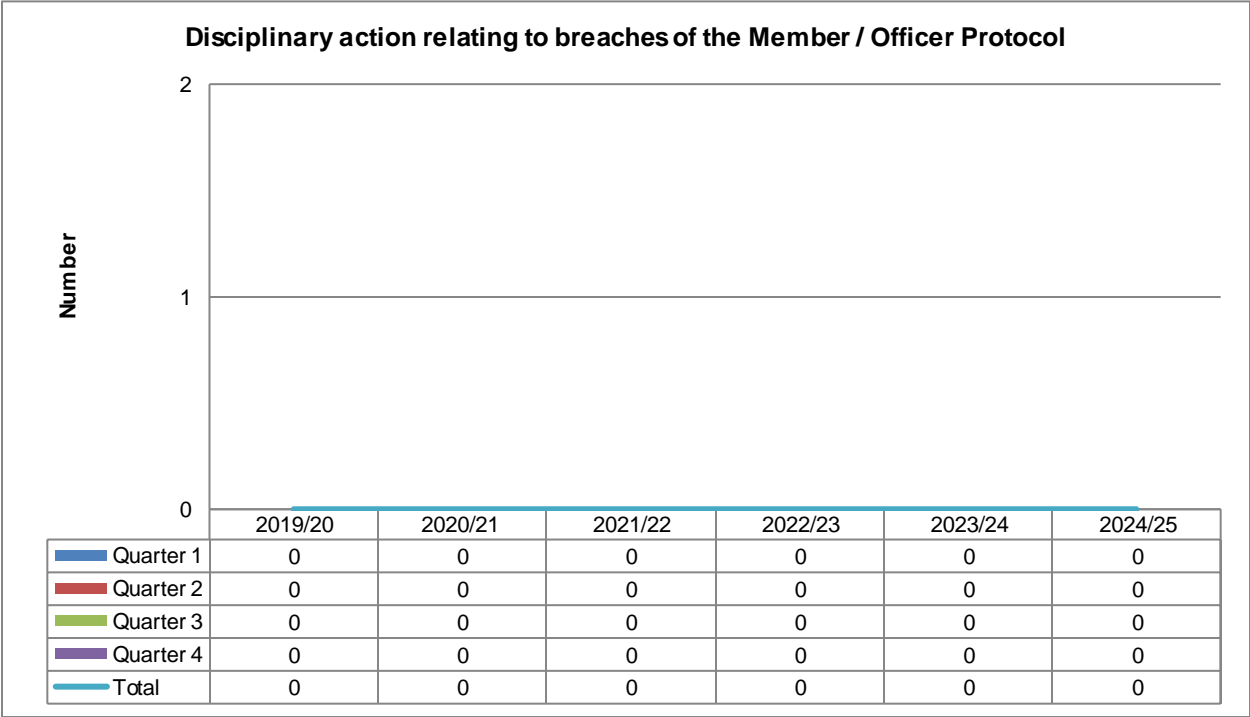


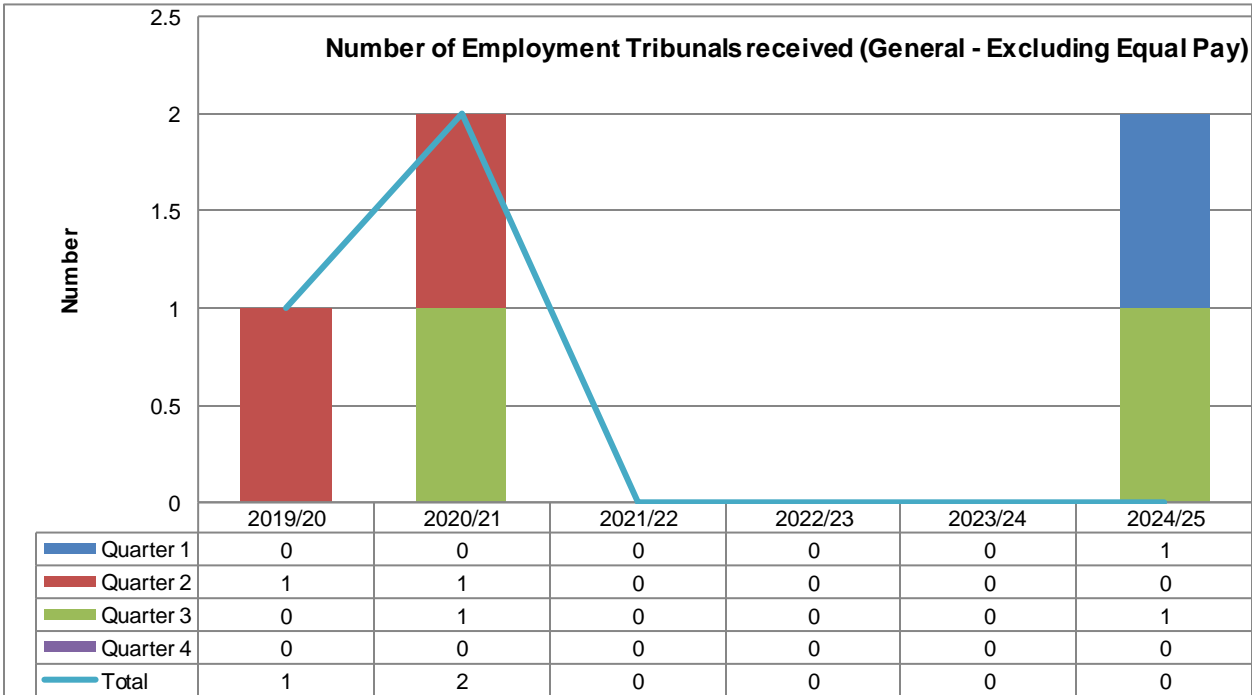
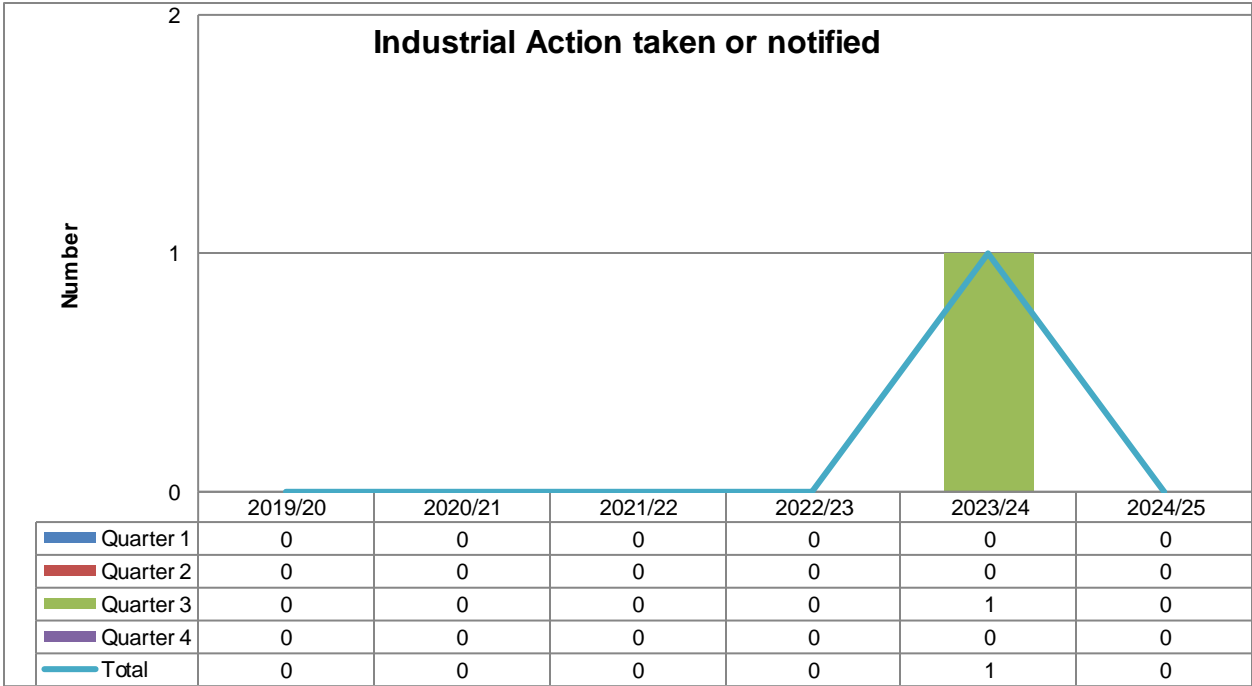
Comments

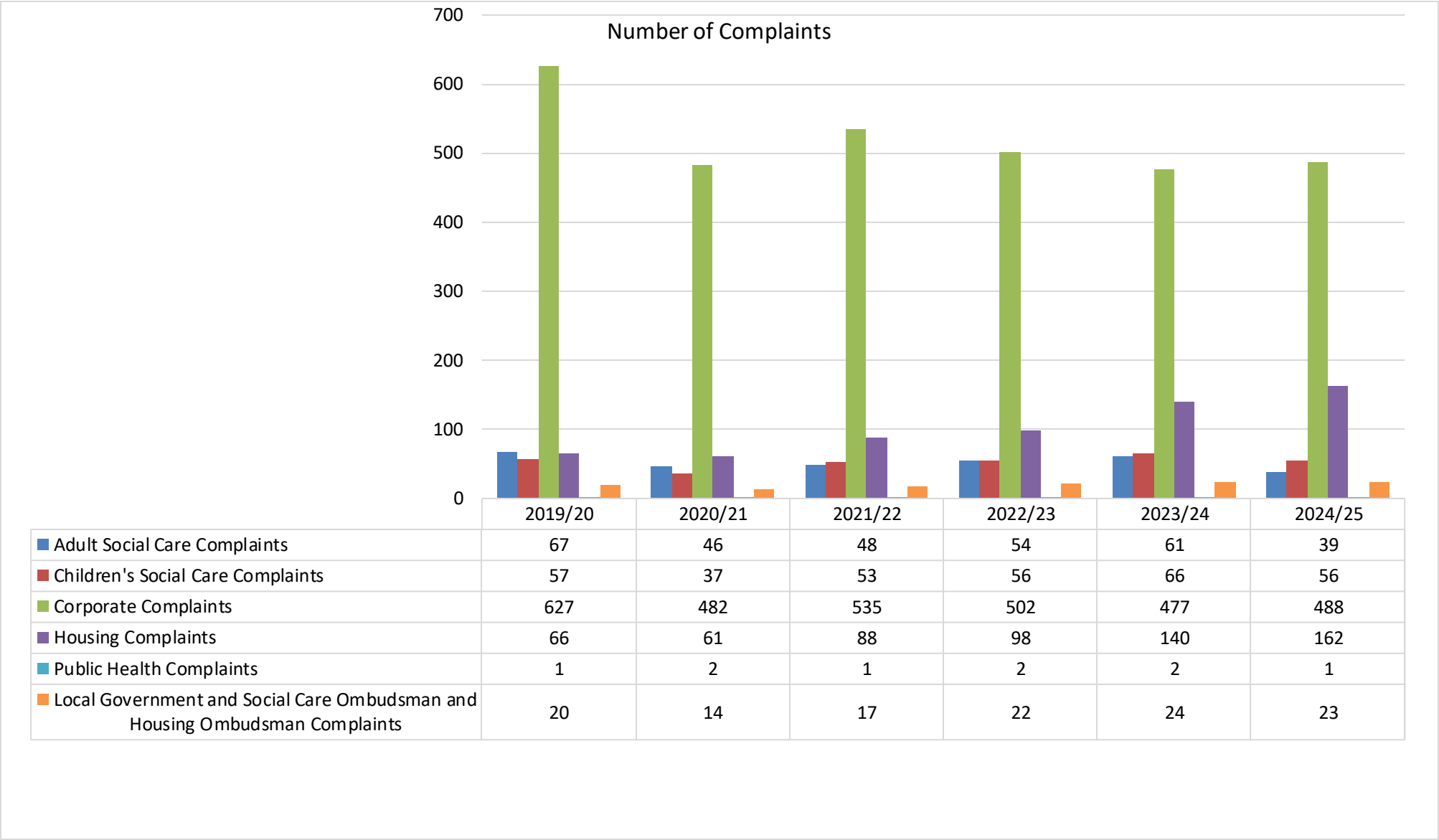
There has been a slight decrease in the number of complaints received during 2024/25 compared to those received in 2023/24.

A more detailed breakdown of Member complaints received and outcomes can be found at Appendix 2.







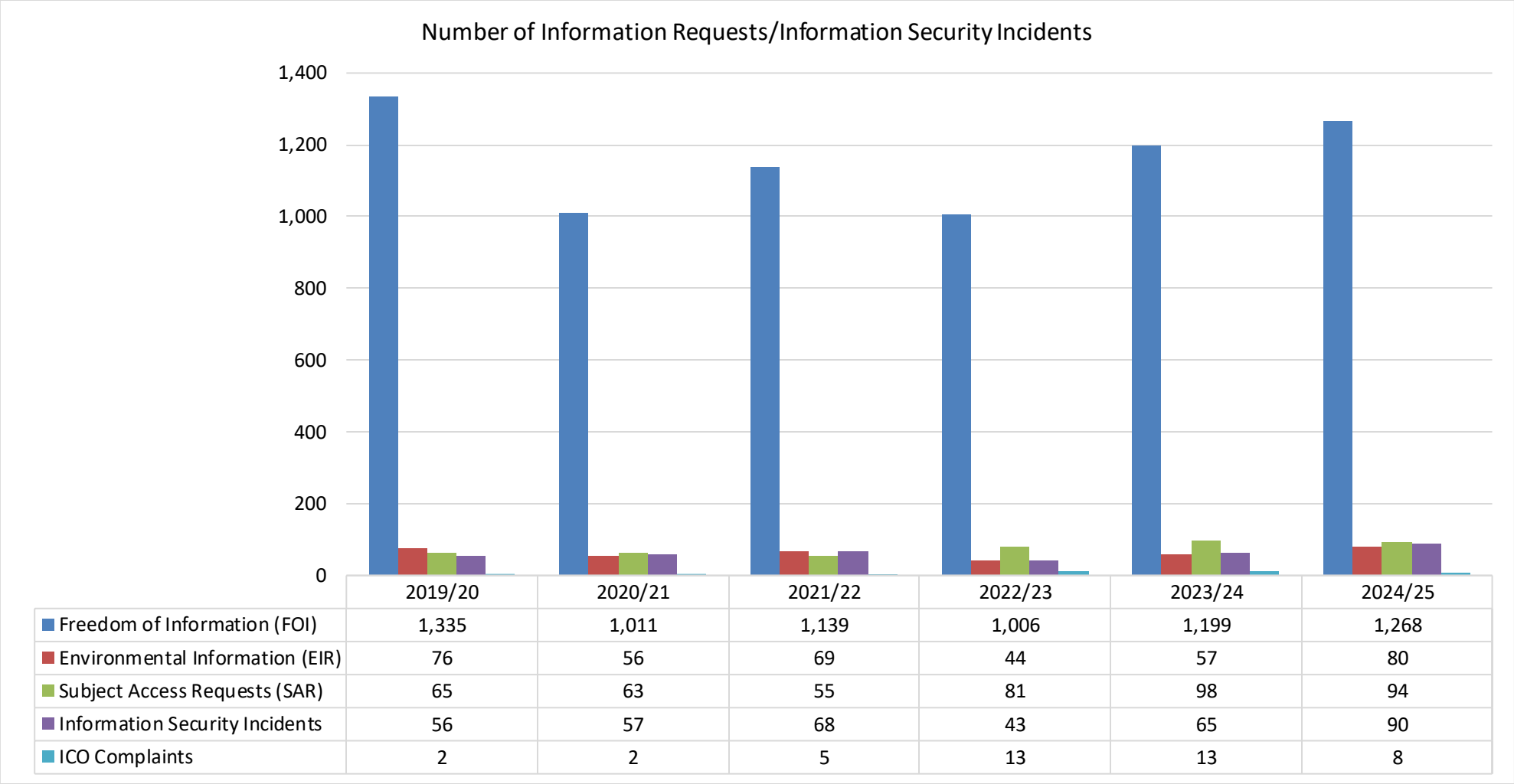




### Comments

2023/24 - while there was an increase in the number of adult social care complaints received, 61 compared to 54 in 2022/23, complaint numbers remained slightly lower than pre-pandemic levels. There was an increase in the number of stage 1 children's social care complaints received, 66 compared to 56 in 2022/23, meaning that for the first time Stage 1 complaints were higher than pre-pandemic levels. There was a decrease in the number of corporate complaints received, 477 compared to 502 in 2022/23, meaning complaint numbers remained significantly lower than pre-pandemic levels. While that was the case there was a significant increase in the number of corporate complaints received at Stage 2. There was an increase in the number of Stage 1 housing complaints received, 140 compared to 98 in 2022/23, which remained significantly higher than pre-pandemic levels, as well as an increase in the number of Stage 2 complaints received. Public health complaints remain low, a total of 2 complaints were received, the same number as in 2022/23.

2024/25 – The Council saw a significant decrease in the number of adult social care complaints received, 39 compared to 61 in 2023/24. There was also a significant decrease in the number of children's social care complaints received, 56 compared to 66 in 2023/24. There was an increase in the number of corporate complaints received, 488 compared to 477 in 2023/24 and a significant increase in the number of housing complaints received, 162 compared to 140 in 2023/24.



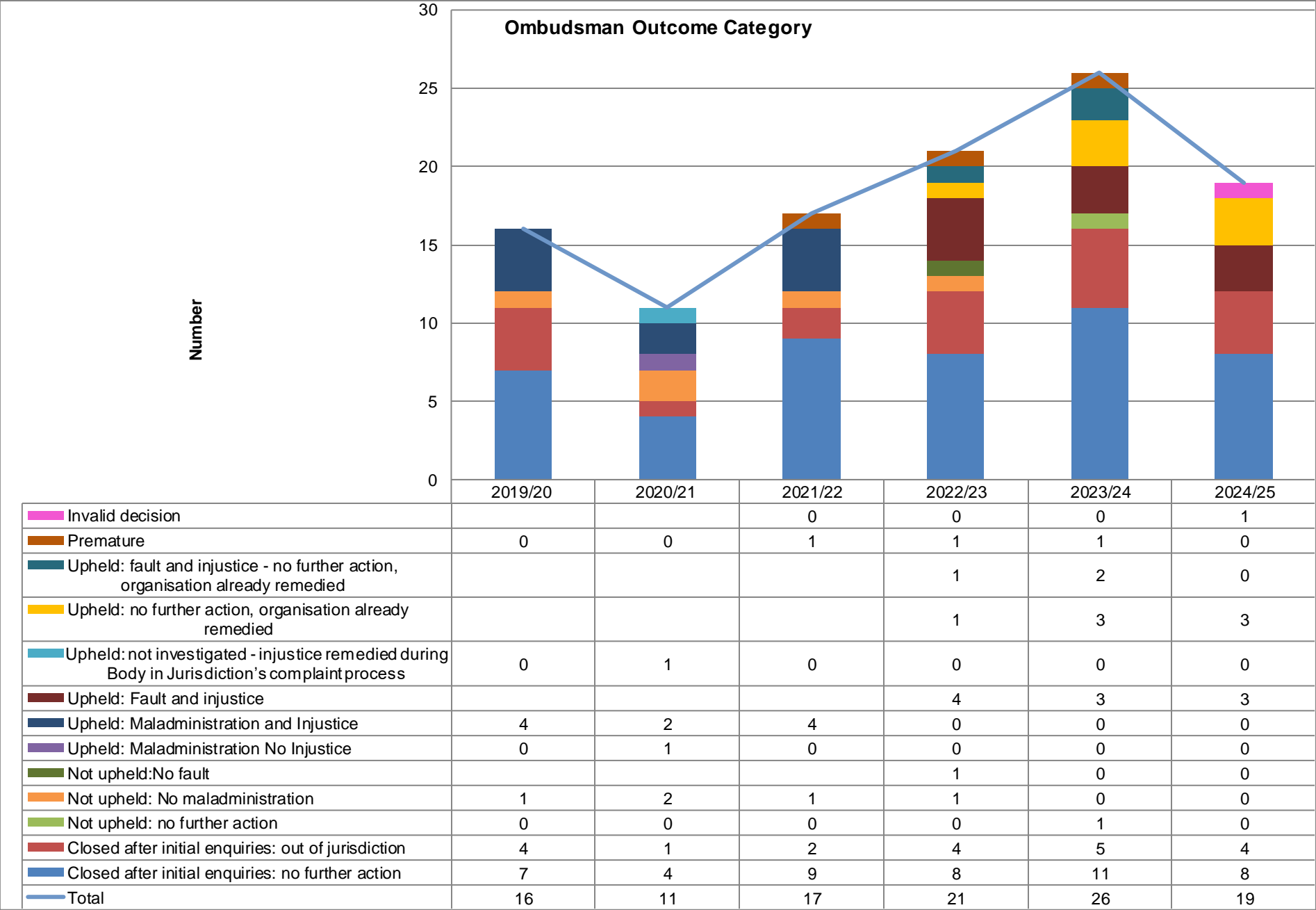
## **Comments**

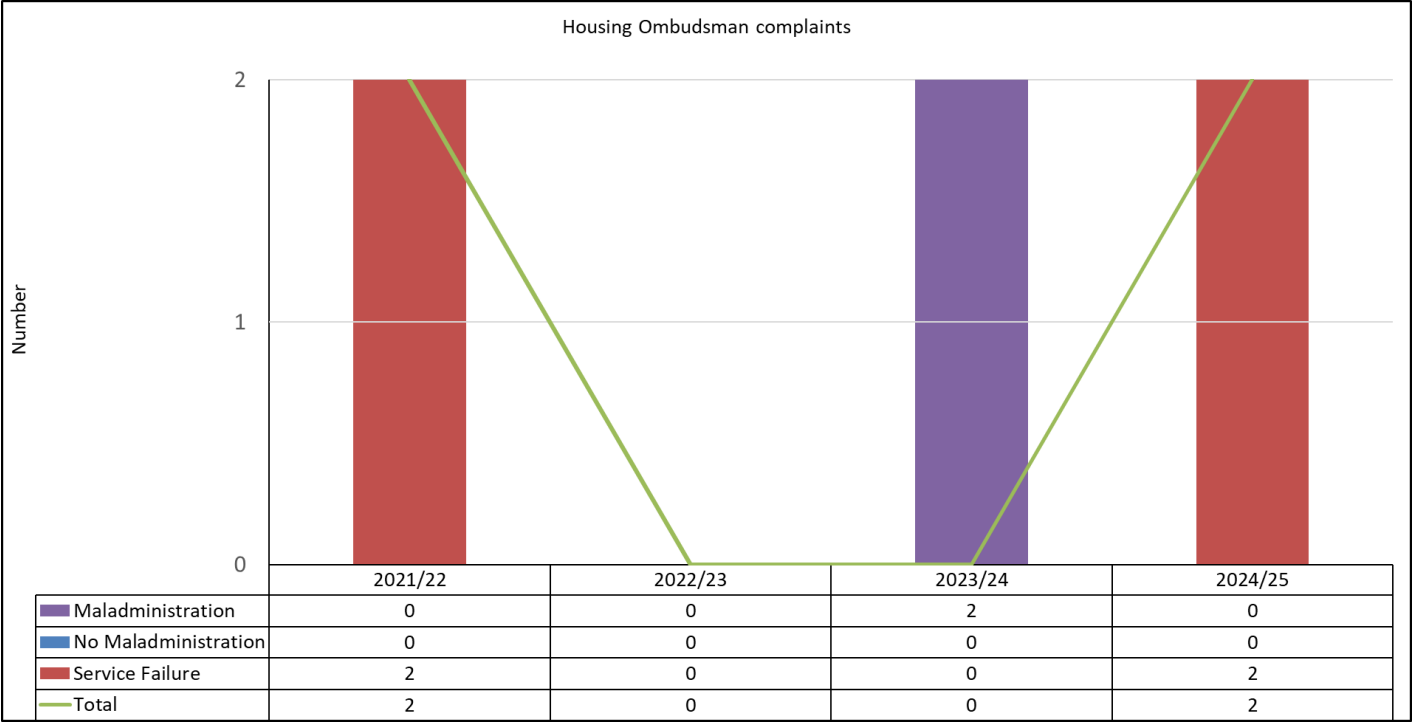
2023/24 – The Council saw an increase in the number of FOI requests received, 1,199 an increase from 1,006 in 2022/23. This will ensure an increased level of transparency and accountability. The Council also saw an increase in the number of EIR requests, 57 compared to 44 in 2022/23. The Council saw an increase in the number of SARs, 98 compared to 81 in 2022/23. The Council also saw an increase in the number of information security incidents reported, 65 compared to 43 in 2022/23. The Council received the same number of ICO complaints as in 2022/23.

2024/25 – The Council saw an increase in the number of FOI requests received, 1,268 compared to 1,199 in 2023/24. The Council also saw an increase in the number of EIR requests received, 80 from 57 in 2023/24. The Council saw a slight decrease in SARs, 94 compared to 98 in 2023/24. The Council saw a significant increase in information security incidents reported, 90 compared to 65 in 2023/24. The Council saw a reduction in the number of ICO complaints received, 8 compared to 13 in 2023/24.

\* *The Local Government and Social Care Ombudsman (LGSCO) has updated the decision outcomes they use in 2022. As a result, it is not possible to make a direct comparison with previous years. However, the new decisions in bold/italics in the table below are broadly comparable to those previous decisions in italics above.*

	2021/22	2022/23	2023/24	2024/25
Closed after initial enquiries: no further action	9	8	11	8
Closed after initial enquiries: out of jurisdiction	1	4	5	4
Not upheld: no further action	0	0	1	0
<i>Not upheld: No maladministration</i>	<i>1</i>	<i>1</i>	<i>0</i>	<i>0</i>
<b><i>Not upheld: No fault</i></b>	<b><i>N/A</i></b>	<b><i>1</i></b>	<b><i>0</i></b>	<b><i>0</i></b>
<i>Upheld: Maladministration and Injustice</i>	<i>4</i>	<i>0</i>	<i>0</i>	<i>0</i>
<b><i>Upheld: Fault and Injustice</i></b>	<b><i>N/A</i></b>	<b><i>4</i></b>	<b><i>3</i></b>	<b><i>3</i></b>
Upheld: Maladministration, No Injustice	0	0	0	0
Upheld: not investigated - injustice remedied during Body in Jurisdiction's complaint process	0	0	0	0
<i>Upheld: no further action, organisation already remedied</i>	<i>0</i>	<i>1</i>	<i>3</i>	<i>3</i>
<b><i>Upheld: fault and injustice – no further action, organisation already remedied</i></b>	<b><i>N/A</i></b>	<b><i>1</i></b>	<b><i>2</i></b>	<b><i>0</i></b>
Premature	1	1	1	0
Invalid decision	0	0	0	1
Total	17	21	26	19





## Appendix 2

Complainant	Complainee	Nature of complaint	Assessment	Investigation	Hearing
<b>2024 Quarter 1</b>					
Member of Public	Borough Councillor	Failure to treat with respect;	Code of Conduct did not apply (no case to answer).	n/a	n/a
Member of Public	Borough Councillor	Discrimination	Apparent misunderstanding rather than discrimination. Investigation not warranted. Clarification given to councillor. Code of Conduct did not apply (no case to answer)	n/a	n/a
Member of Public	Borough Councillor	Failure to treat with respect.	Code of Conduct did not apply (no case to answer).	n/a	n/a
Member of Public	Borough Councillor	Failure to treat with respect; disrepute	Code of Conduct investigation instigated	Yes	TBA
Borough Councillor	Parish Councillor	Failure to treat with respect;	Code of Conduct investigation instigated	Yes	TBA
Member of Public	Borough Councillor	Failure to treat with respect; disrepute; discrimination; misuse of position.	No potential breach of Code of Conduct (no case to answer)	n/a	n/a
<b>2024 Quarter 2</b>					
Member of Public	Borough Councillor	Failure to treat with respect; bullying harassment and discrimination; disrepute	Code of Conduct did not apply (no case to answer). Not acting in official capacity as Councillor	n/a	n/a
Unison	Borough Councillor	Failure to treat with respect; disrepute; discrimination	Potential breach – Other action. Meet with Monitoring Officer to discuss/provide information	n/a	n/a
Unison	Borough Councillor	Failure to treat with respect; disrepute; discrimination	Code of Conduct did not apply (no case to answer)	n/a	n/a
Borough Councillor	Borough Councillor	Failure to treat with respect; disrepute; discrimination	Potential breach – Other action. Meet with Monitoring Officer to discuss/provide information	n/a	n/a
Borough Councillor	Borough Councillor	Failure to treat with respect; disrepute; discrimination	Code of Conduct did not apply (no case to answer)	n/a	n/a
Member of Public	Borough Councillor	Failure to treat with respect; disrepute	Code of Conduct did not apply (no case to answer)	n/a	n/a

Complainant	Complainee	Nature of complaint	Assessment	Investigation	Hearing
<b>2024 Quarter 3</b>					
Member of Public	Borough Councillor	Disrepute; seek an advantage or disadvantage	Code of Conduct did not apply (no case to answer)	n/a	n/a
Member of Public	Borough Councillor	Failure to treat with respect	Code of Conduct did not apply (no case to answer)	n/a	n/a
Member of Public	Borough Councillor	Disrepute; Use of position; Use of local authority resources and facilities	Code of Conduct did not apply (no case to answer)	n/a	n/a
Member of Public	Borough Councillor	Failure to act with integrity and honesty; act lawfully; lead by example and act in a way that secures public confidence	Code of Conduct did not apply (no case to answer) – councillor had taken advice from Monitoring Officer prior to complaint on issue raised	n/a	n/a
<b>2024 Quarter 4</b>					
Member of Public	Borough Councillor	Failure to treat with respect; Failure to lead by example; Failure to uphold high standards of conduct	Ongoing		
Member of Public	Borough Councillor	Failure to lead by example and act in a way that secures public confidence; ensure that public resources are used prudently in accordance with the local authority's requirements and in the public interest	Ongoing		
Member of Public	Borough Councillor	Failure to treat with respect; lead by example and act in a way that secures public confidence in the role of councillor	Ongoing		



Complainant	Complaine	Nature of complaint	Assessment	Investigation	Hearing
Member of Public	Borough Councillor	Failure to Act with Openness and Honesty; Obstruction of Information; Failure to Remain Impartial; Making deliberately misleading statements; Harassment and unsolicited contact; undue influence in decision making	Ongoing		
Member of Public	Borough Councillor	Deliberate misrepresentation	Ongoing		