

SLOUGH BOROUGH COUNCIL

REPORT TO: Audit & Corporate Governance Committee
DATE: 4th March 2021
CONTACT OFFICER: Hugh Peart, Monitoring Officer
WARDS: All

PART I **FOR COMMENT & CONSIDERATION**

COUNCILLOR CODE OF CONDUCT

1. **Purpose of Report**

The Local Government Association ('LGA') has recently published a new Model Code of Conduct for Councillors, and the Committee is requested to consider both this and the recommendations of the Committee on Standards in Public Life ('CSPL').

2. **Recommendation(s)/Proposed Action**

The Committee is requested to:

- Determine which if any of the elements of the LGA new model code of conduct it wishes to adopt, and refer any recommended changes to the Member Panel on the Constitution; and
- Note the progress in implementing the recommendations of the CSPL and comment specifically on recommendations 2, 3, 5, 7, 9 & 12.

3. **The Slough Joint Wellbeing Strategy, the JSNA and the Five Year Plan**

The delivery of all these strategic priorities is dependent on the highest possible standards of openness, honesty and accountability. This is underpinned by the Confidential Whistleblowing Code, the Councillors' Code of Conduct and good governance arrangements being in place.

4. **Other Implications**

(a) **Financial**

There are no financial implications of proposed action.

(b) **Human Rights Act and Other Legal Implications**

The law relating to Councillors' conduct is contained in the Localism Act 2011. Under Section 27 of that Act the Council must promote and maintain high standards of conduct by members of the Council and, in discharging this duty, the Council must adopt a code dealing with the conduct that is expected of members of the Council when they are acting in that capacity. The Council must secure, by virtue of Section 28 of that Act, that such code adopted by it is, when viewed as a whole, consistent with the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership (the "Nolan Principles").

The Council must also have in place arrangements under which allegations can be investigated and arrangements under which decisions on allegations can be made, and if the Council find that a member of the Council has failed to comply with its code of conduct, it may

have regard to the failure in deciding whether to take action in relation to the member and what action to take.

(c) Equalities Impact Assessment

There is no identified need for an EIA arising from this Report.

5. SECTION 1: LGA NEW MODEL CODE OF CONDUCT

- 5.1** In 2019 the Local Government Association undertook a review of the Councillor Code of Conduct. This review resulted in a new draft code, which was consulted on last Summer, and received over 1,400 responses.
- 5.2** In response to the Consultation, in December last year the LGA published a new Model Code of Conduct, which was sent to all members of this Committee before Christmas, and the link is <https://www.local.gov.uk/local-government-association-model-councillor-code-conduct-2020-0>
- 5.3** In a joint statement the LGA introduced the Code as follows:

The role of councillor across all tiers of local government is a vital part of our country's system of democracy. It is important that as councillors we can be held accountable and all adopt the behaviours and responsibilities associated with the role.

Our conduct as an individual councillor affects the reputation of all councillors. We want the role of councillor to be one that people aspire to. We also want people from a range of backgrounds and circumstances to be putting themselves forward to become councillors.

As councillors we represent local residents, work to develop better services and deliver local change. The public have high expectations of us and entrust us to represent our local area; taking decisions fairly, openly and transparently. We have both an individual and collective responsibility to meet these expectations by maintaining high standards and demonstrating good conduct, and by challenging behaviour which falls below expectations.

Importantly we should be able to undertake our role as a councillor without being intimidated, abused, bullied or threatened by anyone, including the general public.

This Code has been designed to protect our democratic role, encourage good conduct and safeguard the public's trust in local government.

6. Commentary

Set out below are the material differences between the Council's current Code and the new model one:

7. Tense

The Current Code used the phrase 'you must', the new model is drafted around the first person, e.g. 'I act lawfully'.

8. General principles of councillor conduct

- 8.1 The current Code provides that 'When acting in your role as Member of the Council, you must ensure that you conduct yourself in such a manner that complies with the Seven Principles of Public Life.'
- 8.2 The new model is more detailed as follows:
- 8.3 Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, councillors and local authority officers; should uphold the Seven Principles of Public Life, also known as the Nolan Principles.
- 8.4 Building on these principles, the following general principles have been developed specifically for the role of councillor.
- 8.5 In accordance with the public trust placed in me, on all occasions:
- I act with integrity and honesty
 - I act lawfully
 - I treat all persons fairly and with respect; and
 - I lead by example and act in a way that secures public confidence in the role of councillor.
- 8.6 In undertaking my role:
- I impartially exercise my responsibilities in the interests of the local community
 - I do not improperly seek to confer an advantage, or disadvantage, on any person
 - I avoid conflicts of interest
 - I exercise reasonable care and diligence; and
 - I ensure that public resources are used prudently in accordance with my local authority's requirements and in the public interest.'

9. Application of the Code

- 9.1. The current code is silent as to when it applies but is treated as applying when a councillor is acting in that role, and not e.g. when at home or work. The new model is more specific:
- 9.2 This Code of Conduct applies to you as soon as you sign your declaration of acceptance of the office of councillor or attend your first meeting as a co-opted member and continues to apply to you until you cease to be a councillor.
- 9.3 This Code of Conduct applies to you when you are acting in your capacity as a councillor which may include when:
- you misuse your position as a councillor
 - Your actions would give the impression to a reasonable member of the public with knowledge of all the facts that you are acting as a councillor;
- 9.4 The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

9.5 You are also expected to uphold high standards of conduct and show leadership at all times when acting as a councillor.

Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct, and you are encouraged to seek advice from your Monitoring Officer on any matters that may relate to the Code of Conduct.

10. Standards of Conduct

10.1. The current code requires that:

10.2. You must treat others with respect, including Council officers and other elected Members.

10.3. You must not bully any person (including specifically any Council employee) and you must not intimidate or improperly influence, or attempt to intimidate or improperly influence, any person who is involved in any complaint about any alleged breach of this Code of Conduct. Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Examples of bullying are:

- spreading malicious rumours, or insulting someone by words or behaviour
- copying memos that are critical of someone to others who do not need to know
- ridiculing or demeaning someone – picking on them or setting them up to fail
- exclusion or victimization
- unfair treatment
- overbearing supervision or other misuse of power or position
- unwelcome sexual advances – touching, standing too close, display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected making threats or comments about job security without foundation
- deliberately undermining a competent worker by overloading and constant criticism
- preventing individuals progressing by blocking promotion or training opportunities

10.4 You must not do anything which compromises or is likely to compromise the impartiality of anyone who works for or on behalf of the Council.

10.5 You must not conduct yourself in a manner which could reasonably be regarded as bringing the Council, or your office as a Member of the Council, into disrepute.

10.6 You must not use or attempt to use your position as a Member improperly to confer on or secure for yourself or any other person any advantage or disadvantage.

10.7 You have a duty to uphold the law including the general law against discrimination

- 10.8 When using or authorising the use by others of the resources of the Council, you must act in accordance with the Council's reasonable requirements (as set out in such protocol as it may adopt from time to time for these purposes) and must ensure they are not used for party political purposes.
- 10.9 You must not prevent, or attempt to prevent, another person from gaining access to information to which they are entitled by law.
- 10.10 You must not disclose information which is given to you in confidence, or information which you believe or ought reasonably to be aware is of a confidential nature, unless:
- You have the consent of a person authorised to give it; or
 - You are required by law to do so; or
 - The disclosure is made to a third party for the purpose of obtaining professional advice, provided that the third party agrees not to disclose the information to any other person; or
 - The disclosure is reasonable and in the public interest and made in good faith.

11 The new model code is again more detailed:

11.1 Standards of councillor conduct

11.2 This section sets out your obligations, which are the minimum standards of conduct required of you as a councillor. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

11.3 Guidance is included to help explain the reasons for the obligations and how they should be followed.

11.4 General Conduct

11.5 **Respect:** as a councillor:

- I treat other councillors and members of the public with respect.
- I treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play.

11.6 Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a councillor, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

11.7 In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in councillors.

11.8 In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the local authority, the relevant social media provider or the police. This also applies to fellow councillors, where action could then be taken under the Councillor Code of Conduct, and local authority

employees, where concerns should be raised in line with the local authority's councillor officer protocol.

11.9 **Bullying, harassment and discrimination:** as a councillor:

- I do not bully any person.
- I do not harass any person.
- I promote equalities and do not discriminate unlawfully against any person.

11.10 The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

11.11 The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

11.12 Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

11.13 The Equality Act 2010 places specific duties on local authorities. Councillors have a central role to play in ensuring that equality issues are integral to the local authority's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services.

11.14 **Impartiality of officers of the council:** as a councillor I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority.

11.15 Officers work for the local authority as a whole and must be politically neutral (unless they are political assistants). They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

11.16 **Confidentiality and access to information:** as a councillor:

11.16.1. I do not disclose information:

- a) given to me in confidence by anyone
- b) acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless
 - i. I have received the consent of a person authorised to give it;
 - ii. I am required by law to do so;

- iii. the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
- iv. the disclosure is:
 - a) reasonable and in the public interest; and
 - b) made in good faith and in compliance with the reasonable requirements of the local authority; and
 - c) I have consulted the Monitoring Officer prior to its release.

11.17. I do not improperly use knowledge gained solely as a result of my role as a councillor for the advancement of myself, my friends, my family members, my employer or my business interests.

11.18. I do not prevent anyone from getting information that they are entitled to by law.

11.19. Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the local authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

11.20. **Disrepute:** as a councillor: I do not bring my role or local authority into disrepute.

11.21. As a Councillor, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other councillors and/or your local authority and may lower the public's confidence in you or your local authority's ability to discharge your/it's functions. For example, behaviour that is considered dishonest and/or deceitful can bring your local authority into disrepute.

11.22. You are able to hold the local authority and fellow councillors to account and are able to constructively challenge and express concern about decisions and processes undertaken by the council whilst continuing to adhere to other aspects of this Code of Conduct.

11.23. **Use of position:** as a councillor I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.

11.24. Your position as a member of the local authority provides you with certain opportunities, responsibilities and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

11.25. **Use of local authority resources and facilities:** as a councillor

- I do not misuse council resources.
- I will, when using the resources of the local or authorising their use by others:

- a) act in accordance with the local authority's requirements; and
- b) ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the local authority or of the office to which I have been elected or appointed.

11.26. You may be provided with resources and facilities by the local authority to assist you in carrying out your duties as a councillor.

Examples include:

- office support
- stationery
- equipment such as phones, and computers
- transport
- access and use of local authority buildings and rooms.

11.27. These are given to you to help you carry out your role as a councillor more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the local authority's own policies regarding their use.

11.28. **Complying with the Code of Conduct:** as a Councillor:

- I undertake Code of Conduct training provided by my local authority.
- I cooperate with any Code of Conduct investigation and/or determination.
- I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.
- I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.

11.29. It is extremely important for you as a councillor to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the local authority or its governance. If you do not understand or are concerned about the local authority's processes in handling a complaint you should raise this with your Monitoring Officer.

12. Interests

12.1. The current code provides that:

You must register in the Council's Register of Members' Interests your Disclosable Pecuniary Interests and your Personal Interests by writing to the Monitoring Officer within 28 days of your appointment as a Member of the Council; and any change taking place in your interests.

12.2. Under Section 34 of the Localism Act 2011 it is a criminal offence if a Member fails without reasonable excuse to inform the monitoring officer of any disclosable pecuniary interests which that member has before the end of the period of 28 days beginning with the date on which he or she became a member or provides information that is false or misleading knowing that the information is false or misleading or is reckless as to whether the information is false and not misleading; or

- 12.3. fails without reasonable excuse to inform the monitoring officer of any disclosable pecuniary interests which that member has, which are not already registered in the register of members' interests, the before the end of the period of 28 days beginning with the date on which he or she is re-elected as a member, or provides information that is false or misleading knowing that the information is false or misleading or is reckless as to whether the information is false and not misleading; or
- 12.4. fails without reasonable excuse, at any meeting of the council or of any committee, sub-committee, joint committee or joint sub-committee at which he or she is present, to declare any disclosable pecuniary interests which that member is aware he or she has in any matter which is to be, or is being, considered at such meeting, or provides information that is false or misleading knowing that the information is false or misleading or is reckless as to whether the information is false and not misleading; or
- 12.5. fails without reasonable excuse, to inform the Monitoring Officer within 28 days of disclosing any disclosable pecuniary interest at any meeting of the council or of any committee, sub-committee, joint committee or joint sub-committee if that interest is not registered in the register of members' interests or is not subject to appending notification or provides information that is false or misleading knowing that the information is false or misleading or is reckless as to whether the information is false and not misleading.
- 12.6. Where the Monitoring Officer is made aware of circumstances which may constitute a criminal offence under Section 34 of the Localism Act 2011 they will report the matter to the Police for their investigation before undertaking their own enquiries.
- 12.7. Failure without reasonable excuse to register a Disclosable Pecuniary or Personal Interest is a breach of this Code.
- 12.8. **Gifts and Hospitality**
- 12.9. You must within 28 days of receipt, notify the Monitoring Officer in writing of any gift, benefit or hospitality with a value in excess of £50 which you have accepted as a Member from any person or body other than the borough Council.
- 12.10. The Monitoring Officer will place the notification on the public register of gifts and hospitality.
- 12.11. The new model code provides:
- 12.12. **As a councillor:** I register and disclose my interests.
- 12.13. Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of members of the authority.
- 12.14. You need to register your interests so that the public, local authority employees and fellow councillors know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should disclose an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be disclosed by you or other councillors when making or taking part in decisions, so that decision

making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

12.15. You should note that failure to register or disclose a disclosable pecuniary interest as set out in Table 1, is a criminal offence under the Localism Act 2011.

Appendix B sets out the detailed provisions on registering and disclosing interests. If in doubt, you should always seek advice from your Monitoring Officer.

12.16. **Gifts and hospitality:** as a councillor:

- I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the local authority or from persons who may apply to the local authority for any permission, licence or other significant advantage.
- I register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.
- I register with the Monitoring Officer any significant gift or hospitality that I have been offered but have refused to accept.

12.17. In order to protect your position and the reputation of the local authority, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a councillor. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register gifts and hospitality which are not related to your role as a councillor, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a councillor. If you are unsure, do contact your Monitoring Officer for guidance.

12.18. **Personal Security**

12.19. Where you think that disclosure of the details of any of your interests could lead to you, or a person connected with you, being subject to violence or intimidation, the Monitoring Officer may at your request make a note on the Register that you have an interest, but withhold the details.

12.20. **Declaration at Meetings**

12.21. All Members are required to disclose their Disclosable Pecuniary or Personal Interests at any meeting where a matter under discussion affects one or more of those interests.

12.22. Members should also declare as a Personal Interest where the subject matter under discussion:

- might reasonably be regarded as affecting the wellbeing or financial standing of them or a member of their family or a person with whom they have a close association to a greater extent than it would affect the majority of Council Tax payers, rate payers or inhabitants of their ward or Slough, or

- relates to or is likely to affect any of the interests listed in the Table in Appendix 2 of this Code, but in respect of a member of the Member's family or a person with whom they have a close association

12.23. **Action following declaration**

12.24. If you have declared a Disclosable Pecuniary Interest, you must withdraw from the room without participating in any discussion of or vote on the matter unless a written dispensation has been granted.

12.25. If you have declared a Personal Interest consider whether a member of the public with knowledge of the relevant facts would reasonably regard the interest as so significant that it is likely to prejudice your judgement of the public interest. If you believe this to be the case then you must withdraw from the room without participating in any discussion of or vote on the matter.

12.26. If this test is not met, you may remain, speak and vote on the matter provided that you declare that you are impartial on the matter.

13. SECTION 2: COMMITTEE ON STANDARDS IN PUBLIC LIFE

In 2019 the Committee published its report on Local Government Ethical Standards, and a copy of its recommendations was sent to all members of this Committee before Christmas. The report runs to over 100 pages and can be found here:

<https://www.gov.uk/government/publications/local-government-ethical-standards-report>.

Arising from the review the Committee made 15 recommendations, which are set out below, together with the progress/comments against each:

Recommendation	Current status	Comment
1. Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.	Implemented	This is covered in both SBC's current & the LGA model code
2. Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation and prohibiting trivial or malicious allegations by councillors.	Not implemented	The provision about complying with investigations is not in Slough's code but is in the LGA model one. The prohibition on trivial or malicious complaints is not in either code.
3. Principal authorities should review their code of conduct each year and	Part implemented	SBC's Code has been updated as

<p>regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.</p>		<p>required and is reviewed as part of consideration of the new LGA model Code earlier in this report. An annual review can be scheduled if thought appropriate.</p>
<p>4. An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.</p>	<p>Implemented</p>	<p>The current code is readily accessible on SBC's website, but at present visitors are not encouraged to visit council premises, but they will be made available when they are</p>
<p>5. Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.</p>	<p>Part implemented</p>	<p>Councillors' Gifts & Hospitality are currently registered in paper form, but subject to Councillors' views can be published online for the new Municipal Year.</p>
<p>6. Councils should publish a clear and straightforward public interest test against which allegations are filtered.</p>	<p>Implemented</p>	<p>The Assessment Criteria are in Appendix 9 to the Code</p>
<p>7. Local authorities should have access to at least two Independent Persons.</p>	<p>Not implemented</p>	<p>It is not considered necessary, given the volume of complaints, to have 2 independent persons, but councillors' views are sought</p>
<p>8. An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation and should be given the option to review and comment on allegations which the responsible officer is minded</p>	<p>Implemented</p>	<p>SBC's Independent Person is consulted at each stage of the investigation of a complaint, including where it is</p>

<p>to dismiss as being without merit, vexatious, or trivial.</p>	<p></p>	<p>dismissed.</p>
<p>9. Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.</p>	<p>Not implemented</p>	<p>Subject to Councillors' views the Code can be amended to reflect this</p>
<p>10. A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.</p>	<p>Implemented</p>	<p>This guidance is in place on the website</p>
<p>11. Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council as a whole, rather than the clerk in all but exceptional circumstances.</p>	<p>Part Implemented</p>	<p>All the Parishes in Slough have been advised of this, but it is up to each whether to adopt this provision.</p>
<p>12. Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.</p>	<p>Part Implemented</p>	<p>The Constitution contains a Monitoring Officer Protocol but this does not currently reflect responsibility to parish councils and it is recommended the protocol be amended to reflect this</p>
<p>13. A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring</p>	<p>Implemented</p>	<p>If the Monitoring Officer has of a conflict of interest, another Monitoring Officer from HB</p>

Officer from a different authority to undertake the investigation.		Public Law would undertake the investigation.
<p>14. Councils should report on separate bodies they have set up or which they own as part of their annual governance statement, and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness, and publish their board agendas and minutes and annual reports in an accessible place.</p>	Not Implemented	The Governance of Slough's companies is being reviewed by Internal Audit, who are supportive of these recommendations, which will be picked up as part of that work.
<p>15. Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.</p>	Implemented	Senior Officers meet regularly with both Group Leaders

14. Background Papers

None