

Rother District Council

Report to:	Audit and Standards Committee
Date:	20 June 2022
Title:	Government Response to the review of Local Government Ethical Standards
Report of:	Lorna Ford, Monitoring Officer
Purpose of Report:	To consider the Government's response to the review of Local Government Ethical Standards and to consider what action to take, if any.
Officer Recommendation(s):	It be RESOLVED : That the report be noted, and consideration be given to any resulting actions thought necessary by the Committee.

Introduction

1. In March 2018, this Committee (under the previous administration) responded to the Committee on Standards in Public Life's (CSPL) Review of Local Government Ethical Standards. The independent CSPL advises the Prime Minister on ethical standards across the whole of public life in the UK; it monitors and reports on issues relating to the standards of conduct of all public office holders.
2. The CSPL's report was published and submitted to Government in January 2019 and this Committee considered the report and its findings in June 2019. The CSPL made a total of 26 recommendations, the majority of which were for the Government, together with 15 best practice guidelines which were directed at local authorities.
3. At that time, and in accordance with an initial review undertaken by East Sussex County Council, Rother District Council (RDC) agreed to two amendments to its existing Code of Conduct, strengthening the wording around bullying and harassment and the need for Members to comply with any formal investigation in relation to a Code of Conduct complaint.
4. It was further agreed that any proposed resulting changes to legislation be considered if and when enacted by Government. An assessment of RDC's current practice against the best practice guidelines was also presented to this Committee in December 2019, which was favourable and some minor improvements were made at that time.

Government Response

5. The Government's response to the CSPL's report was published on 18 March 2022, some three years after the original report was presented, delayed by initially Brexit and then the COVID-19 pandemic. The response is set out in full at Appendix 1, together with officer commentary.

6. The CSPL issued a response to the Government as follows:

“While we note the government’s commitment to further work to support local government, the Committee is disappointed that many of its careful recommendations have not been accepted. It was clear from our evidence that the sector backed our call to strengthen the arrangements in place to support high ethical standards, whilst respecting the benefits of a localised approach.

We are pleased that many local authorities have already reviewed their approach as a result of this work and are adopting the best practice points from the report. Across all tiers of local government, decisions are taken about a wide range of local services using public funds, so it is important that there are robust governance arrangements that command public confidence.”

7. It is encouraging that the Government have agreed to look at a number of issues as a result of the review’s recommendations, but, overall, it seems that there will be no fundamental changes to the current decentralised approach and available sanctions for Members who have been found to have breached the Code of Conduct for the foreseeable future.

8. The Committee is asked to consider the report and agree any additional recommendations as appropriate.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	Consultation	No
Environmental	No	Access to Information	No
Risk Management	No	Exempt from publication	No

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Appendices:	Appendix 1 – Government Response
Relevant Previous Minutes:	AS17/42 – March 2018 response to CSPL consultation AS19/06 – Consideration of CSPL review and recommendations AS19/34 – Best Practice Recommendations
Background Papers:	None.
Reference Documents:	None.

Letter from Kemi Badenoch MP to Lord Evans, Chair, Committee on Standards in Public Life

From: Kemi Badenoch MP – Minister of State for Equalities and Levelling Up Communities

To: Lord Evans of Weardale, KCB, DL – Chair, Committee on Standards in Public Life

Dear Lord Evans,

On behalf of the government, I would like to thank the Committee on Standards in Public Life for its report and the recommendations arising from its review of Local Government Ethical Standards, and to all those who engaged with the Committee's work. Attached is the government response to the Committee's individual recommendations that were directed at government.

Vibrant local democracies flourish where the reputation of the local authority is held in high regard, where councillors' decision-making is transparent, valued and trusted by the communities they serve, and where people are willing and confident to put themselves forward as potential candidates. The standards and conduct framework within which local authorities operate must drive out corruption and promote commitment to the principles on standards in public life, and tolerance to the differing views of others. In responding to the review, the Government has taken into account the importance of protecting free speech and freedom of association within the law.

The government is committed to working with local authorities and their representative organisations to ensure that local government is supported in reinforcing its reputation for ethical local standards.

The fact that this review had been conducted in such a collaborative way with the sector has been apparent from the outset and is borne out in the final report. I am keen that government builds on the sector-wide enthusiasm for improvement.

The government agrees with the Committee's conclusion that there have been benefits from local authorities being responsible for ethical standards, including the flexibility and discretion to resolve standards issues informally. However, we also recognise the role of government in ensuring that the system is robust.

The number of requests for legislation in the Committee's recommendations to strengthen the standards and conduct framework and its safeguards is considerable. As indicated in this response, the government believes that some of these suggestions do not need a legislative response but can be more appropriately, effectively, and swiftly taken forward by local authorities as best practice. The Committee will recognise that the Government and Parliament has taken a different view on these matters when it legislated for the Localism Act 2011.

I thank the Committee for their work on the review and for their patience whilst government carefully considered their recommendations, and I personally look forward to continuing to work with you as government progresses the commitments made in this response with the sector.

Yours sincerely, Kemi Badenoch MP

This government response confines itself to the Committee's recommendations directed at government, other than with regards to the first recommendation. The response to recommendations 10, 12, 13, 14 and 16 have been grouped together and therefore appear out of numerical order below.

Recommendation 1

The Local Government Association should create an updated model code of conduct, in consultation with representative bodies of councillors and officers of all tiers of local government.

Government Response

The Localism Act 2011 states that relevant authorities must promote and maintain high standards of conduct by members and co-opted members. It requires these authorities to adopt a code of conduct for their councillors. Authorities can determine the content of their own code of conduct. However, codes must conform to the 7 'Nolan' principles of standards in public life: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership. Relevant authorities for the purposes of these requirements include local authorities in England, namely county councils, district councils, London borough councils and parish and town councils.

It is for individual councils to set their own local code, in line with the Act. The government has previously published a light-touch illustrative code of conduct.

The Local Government Association has worked with sector representative bodies to update its own suggested code of conduct, with the intention that this new suggested code could establish a consistent benchmark that local authorities can amend or add to as they see fit to reflect local circumstances and priorities. The Local Government Association published the updated code of conduct in January 2021. However, it remains a local decision on whether this model code is adopted.

RDC Officer Comment

In March 2021, this Committee considered the LGA's new model code of conduct, and whilst it was agreed that the model code was clearer and more user-friendly, this alone was not considered enough to justify a recommendation for change by our neighbouring East Sussex authorities with whom we share a common code. At the time it was also considered prudent to wait until the Government had responded to the CSPL's review which might result in further legislative change and meaningful sanctions. It remains the case that this Council can choose to amend its code of conduct and adopt the LGA model code, if it so chooses, but that would take us out of step with other East Sussex principal authorities.

Recommendation 2

The government should ensure that candidates standing for or accepting public offices are not required publicly to disclose their home address. The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 should be amended to clarify that a councillor does not need to register their home address on an authority's register of interests.

Government Response

This issue was brought up in the Committee's work on intimidation in public life, and the government has already taken forward several steps in this regard. The

government is open and receptive to further steps to help prevent intimidation.

The government agrees with the principle behind this recommendation – which safeguards elected representatives – and considers amending the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 would be an option to achieve it.

The government will engage with interested parties on the best means to ensure that candidates and councillors are not required publicly to disclose their home address.

Notwithstanding, it is important that home addresses are internally registered with monitoring officers, to help avoid conflicts of interest.

RDC Officer Comment

The Council has already allowed Councillors the ability to remove their home address from the public register of interests if they consider it to be a sensitive interest due to potential intimidation. A clarification within the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 would be welcome.

Recommendation 3

Councillors should be presumed to be acting in an official capacity in their public conduct, including statements on publicly accessible social media. Section 27(2) of the Localism Act 2011 should be amended to permit local authorities to presume so when deciding upon code of conduct breaches.

Government Response

The government's view is that it is for individual local authorities to consider if their code of conduct is adequate in addressing the issue of inappropriate use of social media.

As the government outlined to Parliament in March 2021 on tackling intimidation in public life: 'It is important to distinguish between strongly felt political debate on the one hand, and unacceptable acts of abuse, intimidation and violence on the other. British democracy has always been robust and oppositional. Free speech within the law can sometimes involve the expression of political views that some may find offensive': a point that the government has recognised in a Department for Education policy paper. But a line is crossed when disagreement mutates into intimidation, which refuses to tolerate other opinions and seeks to deprive others from exercising their free speech and freedom of association.'

It is important to recognise that there is a boundary between an elected representative's public life and their private or personal life. Automatically presuming (irrespective of the context and circumstances) that any comment is in an official capacity risks conflating the two.

RDC Officer Comment

Whilst the Council's current code of conduct does not specifically refer to social media, a judgement call is made when assessing complaints concerning social media postings as to whether the Councillor is acting in their official capacity based on the accessibility of any posting, whether they are using a private social media account, using Council provided equipment, the subject matter etc. each

case is considered on its own merits.

Recommendation 4

Section 27(2) of the Localism Act 2011 should be amended to state that a local authority's code of conduct applies to a member when they claim to act, or give the impression they are acting, in their capacity as a member or as a representative of the local authority.

Government Response

The government agrees that local authority elected representatives should act in good faith in the public interest and not seek to influence decisions for personal gain, for malicious intent or to further the interests of any business or any other organisations which they may be affiliated with.

The Local Government Association have updated their own suggested code of conduct to state that the code applies when “[a member's] actions could give the impression to a reasonable member of the public with knowledge of all the facts that [they] are acting as a [member]”.

It is for individual local authorities to ensure that their codes of conducts are regularly updated, comprehensive and fit for purpose. Elected members receive the necessary training to make them aware of their personal responsibilities in upholding the code.

The government will keep this matter under review but has no immediate plans to amend the regulations.

RDC Officer Comment

The Council's code of conduct scope already contains this provision, as follows:

“..... you must comply with the Code whenever you –

- (a) conduct the business of your authority (which, in this Code, includes the business of the office to which you are elected or appointed); or
- (b) act, claim to act or give the impression you are acting as a representative of your authority.

and references to your official capacity are construed accordingly.

Recommendation 5

The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 should be amended to include: unpaid directorships; trusteeships; management roles in a charity or a body of a public nature; and membership of any organisations that seek to influence opinion or public policy.

Government Response

The electorate must have confidence that the decisions of their elected representatives are being made in the best interests of the community they have been elected to serve. Unpaid roles may need to be declared, if it is relevant to council business, and councillors should recuse themselves, if necessary, if discussions relate to private bodies they are involved in.

The government is mindful that councillors have a right to a private life, and rights of freedom of association outside their role as a councillor. It is frequently the case that people in public life have a complex pattern of interests and play a variety of roles with different types of organisations, including community interest groups and charities.

The government will keep this matter under review but has no immediate plans to amend the regulations.

RDC Officer Comment

The Council's code of conduct has retained these other registerable interests.

Recommendation 6

Local authorities should be required to establish a register of gifts and hospitality, with councillors required to record gifts and hospitality received over a value of £50 or totalling £100 over a year from a single source. This requirement should be included in an updated model code of conduct.

Government Response

The Local Government Association's suggested code of conduct published in January 2021 includes a requirement for members to "register... any gift or hospitality with an estimated value of at least £50". However, it did not contain any requirements relating to the total value of gifts or hospitality received from the same source over a sustained period.

Local authorities have the autonomy to set gifts and hospitality requirements in their own codes of conduct. The government accepts that there is merit in best practice guidance on the thresholds for gifts and hospitality and agrees that a register of gifts and hospitality should be publicly available.

RDC Officer Comment

The Council's current Code of Conduct retained the provision to record any gifts or hospitality received over the value of £50. Whilst some Members have considered this threshold too high, no amendment was considered in March 2021, but Members are free to reconsider this at any time.

Recommendation 7

Section 31 of the Localism Act 2011 should be repealed, and replaced with a requirement that councils include in their code of conduct that a councillor must not participate in a discussion or vote in a matter to be considered at a meeting if they have any interest, whether registered or not, "if 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 consideration or decision-making in relation to the matter".

Government Response

Section 31 of the Localism Act 2011 requires that a councillor must not participate in a discussion or vote on a matter where they have a disclosable pecuniary interest in any matter to be considered at the meeting. Section 30(3) of the Localism Act 2011 further provides that any relevant pecuniary interests of a councillor's spouse or partner are considered as a disclosable pecuniary interest of the councillor.

The Committee's report reflects concerns that the disclosable pecuniary interest arrangements infringe on the privacy of a councillor's spouse or partner. Where there would be a potential conflict of interest, the principle of integrity requires that any such interests should nevertheless be declared and resolved.

The Government will keep this matter under review but has no immediate plans to repeal Section 31 of the Localism Act 2011.

RDC Officer Comment

The Council's current Code of Conduct has retained "prejudicial interests" from the previous national model code, which covers this scenario.

Recommendation 8

The Localism Act 2011 should be amended to require that Independent Persons are appointed for a fixed term of 2 years, renewable once.

Government Response

The government does not accept this recommendation as appropriate for legislation on the basis that it would be likely to be unworkable. The government's view is that it would be more appropriately implemented as a best practice recommendation for local authorities.

In principle, it may be attractive to limit the terms Independent Persons serve to keep their role and contribution "fresh" and avoid them becoming too closely affiliated with the overriding organisational culture. However, discussions with Monitoring Officers indicate that in practice most local authorities would likely find servicing this rate of turnover unachievable. There is frequently a small pool of people capable and willing to undertake the role, who also fit the stringent specifications of being amongst the electorate, having no political affiliation, no current or previous association with the council, and no friends or family members associated with the council.

When local authorities have found effective Independent Persons who demonstrate the capability, judgement and integrity required for this quite demanding yet unpaid role, it is understandable that they may be reluctant to place limitations on the appointment.

RDC Officer Comment

Agree with Government stance. This proposal would lead to onerous recruitment administration every two years; the Council does not handle a vast amount of complaints and turn over every two years would not provide for consistency and continuity of approach. The Council currently has two appointed IPs with first terms of office (4 years) expiring in December 2023 and July 2025, under our current procedure, both could reapply for a second term, if they wished.

Recommendation 9

The Local Government Transparency Code should be updated to provide that the view of the Independent Person in relation to a decision on which they are consulted should be formally recorded in any decision notice or minutes.

Government Response

The government does not agree with this. The Local Government Transparency Code is a statutory requirement to publish information; it does not regulate the content of councils' minutes or decision notices.

The substantive policy suggestion has merit but will depend on circumstances. In cases where there is no case to answer from an unfounded complaint, it should not necessarily be a legal requirement to publish details of that unfounded complaint.

RDC Officer Comment

Agree with Government stance. Rother IPs are very much part of the Member complaints procedure being consulted at assessment stage and post investigation in cases that are investigated. An IP would attend any Hearing Sub-Committee and their input documented and minuted appropriately.

Recommendation 10

A local authority should only be able to suspend a councillor where the authority's Independent Person agrees both with the finding or a breach and that suspending the councillor would be a proportionate sanction.

Recommendation 12

Local authorities should be given the discretionary power to establish a decision-making standards committee with voting independent members and voting members from dependent parishes, to decide on allegations and impose sanctions.

Recommendation 13

Councillors should be given the right to appeal to the Local Government Ombudsman if their local authority imposes a period of suspension for breaching the code of conduct.

Recommendation 14

The Local Government Ombudsman should be given the power to investigate and decide upon an allegation of a code of conduct breach by a councillor, and the appropriate sanction, on appeal by a councillor who has had a suspension imposed. The Ombudsman's decision should be binding on the local authority.

Recommendation 16

Local authorities should be given the power to suspend councillors, without allowances, for up to 6 months.

Government Response

There is no provision in current legislation for a sanction to suspend a councillor found to have breached the code of conduct, and this was a deliberate policy decision by the Coalition Government at the time of the Localism Act 2011 to differentiate from the previous, failed Standards Board regime. The Standards Board regime allowed politically motivated and vexatious complaints and had a chilling effect on free speech within local government. These proposals would effectively reinstate that flawed regime. (10)

It would be undesirable to have a government quango to police the free speech of councillors; it would be equally undesirable to have a council body (appointed by councillors, and/or made up of councillors) sitting in judgment on the political comments of fellow councillors. (12/13/14)

On the rare occasions where notable breaches of the code of conduct have occurred, local authorities are not without sanctions under the current regime. Councillors can be barred from Cabinet, Committees, or representative roles, and may be publicly criticised. If the elected member is a member of a political group, they would also expect to be subject to party discipline, including being removed from that group or their party. Political parties are unlikely to reselect councillors who have brought their group or party into disrepute. All councillors are ultimately held to account via the ballot box. (16)

As part of the government's response to the Committee's report on intimidation in public life, the government recommended that every political party establish their own code of conduct for party members, including elected representatives.

The government will engage with sector representative bodies of councillors and officers of all tiers of local government to seek views on options to strengthen sanctions to address breaches of the code which fall below the bar of criminal activity and related sanctions but involve serious incidents of bullying and harassment or disruptive behaviour.

RDC Officer Comment

The current sanctions fail to have any teeth, particularly at parish and town council level where cabinet governance models and group structures do not exist (commonly). Sanctions to address disruptive behaviour at parish and town council level, as seen locally within Rother in recent times, are not catered for under the current provisions and Government proposals to seek views on this are welcome. Waiting until the next ordinary elections to hopefully remove a disruptive councillor does not seem conducive to good local governance, particularly given voter apathy and interest in local elections.

The Government's reluctance to involve the Local Government Ombudsman and introduce appeal rights for Councillors who have had a period of suspension imposed is welcome; it would be undesirable for a local decision to be overruled by the Ombudsman.

Recommendation 11

Local authorities should provide legal indemnity to Independent Persons if their views or advice are disclosed. The government should require this through secondary legislation if needed.

Government Response

The government agrees in principle.

Initial soundings with the sector indicate that some local authorities already provide legal indemnity for Independent Persons.

The government endorses providing legal indemnity for Independent Person as local authority best practice but does not currently see the need to require this

through secondary legislation.

RDC Officer Comment

Further advice will be sort with regard to whether legal indemnity is already provided at RDC. The Council has operated on the basis that IP comments on any complaint matter are confidential and not disclosable under Freedom of Information legislation.

Recommendation 15

The Local Government Transparency Code should be updated to require councils to publish annually: the number of code of conduct complaints they receive; what the complaints broadly relate to (e.g., bullying; conflict of interest); the outcome of those complaints, including if they are rejected as trivial or vexatious; and any sanctions applied.

Government Response

The government believes that this is better addressed through the sector adopting as best practice a regular pattern of annual reporting by Standard Committees of the cases and complaints handled and would encourage this as best practice by the sector.

The government does not believe that there is a requirement to prescribe to local authorities the form and content of such Standard Committee annual reports.

RDC Officer Comment

This Council already publishes this information on a six-monthly rolling basis via the reports to this Committee.

Recommendation 17

The government should clarify if councils may lawfully bar councillors from council premises or withdraw facilities as sanctions. These powers should be put beyond doubt in legislation if necessary.

Government Response

The criminal law, overseen by the police and courts, provides for more appropriate and effective action against breaches of public order, for anti-social behaviour, and against harassment.

The occasion where councils would seek to bar councillors from council premises are thought to be extremely rare. We will consider this further.

RDC Officer Comment

This would be welcomed if made a formal sanction; the Government's future response on this will be awaited.

Recommendation 18

The criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished.

Government Response

It is a criminal offence to fail to declare pecuniary interests, which acts as a strong

deterrent against corruption.

The government does not agree with this recommendation, but rather believes the criminal offence of a non-disclosure of pecuniary interest to be a necessary and proportionate safeguard and deterrent against corruption.

The high bar of police involvement has served to discourage politically motivated and unfounded complaints.

RDC Officer Comment

In the absence of any new sanctions, the Government's rationale for retention seems practical.

Recommendation 20

Section 27(3) of the Localism Act 2011 should be amended to state that parish councils must adopt the code of conduct of their principal authority, with the necessary amendments, or the new model code.

Government Response

The government does not agree that this is necessary and has no plans to repeal Section 27(3) of the Localism Act 2011.

The government considers that the adoption of the principal authority's code or the new model code is a matter for local determination.

There are merits in achieving consistency within principal authority areas to eliminate potential confusion amongst constituents and elected members but there may be instances where a parish council may want to add to the code of their principal authority to reflect local circumstances.

RDC Officer Comment

Across the Rother District there is a mixed approach with around half of all parish and towns councils having retained RDC's code of conduct and half adopting the National Association of Local Council's model code and with the new Bexhill-on-Sea Town Council having adopted the new LGA model code of conduct. Whilst the principles are the same, assessment against various codes for complaints and advice with regard to application and interests given by the MO has to be considered on a case by case basis. However, the ability for each parish and town to adopt their own code to suit local circumstances does provide freedom and flexibility.

Recommendation 21

Section 28 (11) of the Localism Act 2011 should be amended to state that any sanction imposed on a parish councillor following the finding of a breach is to be determined by the relevant principal authority.

Government Response

The government has no current plans to repeal Section 28 (11) of the Localism Act 2011 but will give this matter further consideration.

RDC Officer Comment

It is reassuring that the Government will consider this further. Currently, RDC bears the cost of any complaint referred for investigation into a parish or town councillor. It would be encouraging if, after an investigation and imposition of a sanction on a parish councillor, the parish council was bound to implement the sanction.

Recommendation 22

The Local Authorities (Standing Orders) (England) (Amendment) Regulations 2015 should be amended to provide that disciplinary protections for statutory officers extend to all disciplinary action, not just dismissal.

Government Response

The 3 statutory officers in local government are the Monitoring Officer, the Head of Paid Service (Chief Executive) and the Chief Finance Officer (often referred to as the Section 151 Officer).

Under the current disciplinary arrangements for statutory officers, any decision to dismiss a statutory officer must be taken by full council, following a hearing by a panel that must include at least 2 Independent Persons. The Committee consider that the disciplinary protections for statutory officers should be enhanced, by extending disciplinary protections to all disciplinary actions (such as suspension or formal warnings), not just dismissal.

The government agrees in principle with this recommendation and recognises this will be pertinent to Monitoring Officers who may not necessarily be afforded the same seniority in the organisational hierarchy of a local authority as the 2 other statutory officers (Head of Paid Service and the Section 151 Officer), and who may be subject to personal pressures when conducting high profile breach of conduct investigations.

The government will engage with sector representative bodies of all tiers of local government to seek views on amending the Local Authorities (Standing Orders) (England)(Amendment) Regulations to provide disciplinary protections for statutory officers.

RDC Officer Comment

This would provide enhanced protection for these officers and agree with the point made with regard to Monitoring Officers.

Recommendation 23

The Local Government Transparency Code should be updated to provide that local authorities must ensure that their whistleblowing policy specifies a named contact for the external auditor alongside their contact details, which should be available on the authority's website.

Government Response

The government agrees with the principle that openness is essential.

Most local authorities already publish their whistleblowing policy, procedures and a named contact on their websites, and Government is recommending that this is adopted as a best practice recommendation.

The government published the UK National Action Plan for Open Government 2021- 2023 in January 2022. This includes a commitment on local transparency. The Department for Levelling Up Housing and Communities (DLUHC) will work with the local government community to develop a set of specific actions to advance transparency in the sector. DLUHC will support local government to solidify their transparency policies and processes and encourage proactive publication of open data across councils.

RDC Officer Comment

Whilst named Council officers are published on the Council's website for the purposes of whistleblowing and fraud reporting, the Council does not currently specify a named contact for the Council's current external auditors.

The Audit Manager has contacted the Grant Thornton director responsible for the Council's external audit work and he is happy for his name and contact details to be included in the Whistleblowing Policy. The policy will therefore be amended to include this information.

Recommendation 24

Councillors should be listed as 'prescribed persons' for the purposes of the Public Interest Disclosure Act 1998.

Government Response

Prescribed persons are individuals or organisations that a worker may approach outside their workplace to report suspected or known wrongdoing and still be protected by the rights afforded to them under whistleblowing legislation. They are prescribed by an order made by the Secretary of State (for Business, Energy and Industrial Strategy) for this purpose. See a complete list of prescribed persons.

Local councillors would not meet the criteria of being external to an individual's workplace in relation to matters affecting the council and could therefore not be considered as a 'prescribed person' for the purposes of the Public Interest Disclosure Act 1998. Disclosures relating to local authorities can be made to the external auditor of the relevant authority, the Comptroller and Auditor General (National Audit Office), or a Member of Parliament.

However, the government recognises that this may provide a further check and balance against council corruption or wrongdoing and is open to further representations on the matter on how local accountability can be strengthened in this regard.

RDC Officer Comment

Government position noted. No action is required.