



## Standards Committee

Members of the **Standards Committee** of **Gravesham Borough Council** are summoned to attend a meeting to be held at the on **Thursday, 1 August 2019 at 7.30 pm** when the business specified in the following agenda is proposed to be transacted.

S Walsh  
Service Manager (Communities)

### Agenda

#### Part A

#### Items likely to be considered in Public

1. Apologies for absence
2. To sign the minutes of the previous meeting (Pages 3 - 4)
3. To declare any interests members may have in the items contained on this agenda. When declaring an interest a member must state what their interest is.
4. To consider whether any items in Part A of the agenda should be considered in private or those in Part B in public
5. Update on a Review of Local Government Ethical Standards (Pages 5 - 16)  
This report provides an overview of the key outcomes of the report published in January 2019 by the Committee on Standards in Public Life on the subject of ethical standards in local government.
6. Any other business which by reason of special circumstances the Chair is of the opinion should be considered as a matter of urgency

7. Exclusion of the Press and Public

(Pages 17 - 20)

This report summarises the content of the report at agenda item 9 which, in the opinion of the proper officer, contains exempt information within one of the categories in Schedule 12A of the Local Government Act 1972. It is a matter for the Committee to determine whether the press and public should be excluded from the meeting during consideration of this document.

8. Exclusion

To move, if required, that pursuant to Section 100A (4) of the Local Government Act 1972 that the public be excluded from any items included in Part B of the agenda because it is likely in view of the nature of business to be transacted that if members of the public are present during those items, there would be disclosure to them of exempt information as defined in Part 1 of Schedule 12A of the Act.

**Part B**  
**Items likely to be considered in private**

9. Screening of Complaints SC 2019/001

(Pages 21 -  
190)

**Members**

Cllr John Caller (Chair)  
Cllr Lyn Milner (Vice-Chair)

Councillors:           Emma Elliott  
                              Gary Harding  
                              Leslie Hills  
                              Diane Marsh  
                              Ruth Martin  
                              Gurbax Singh  
                              Narinder Singh Thandi

Substitutes:            To be notified

**Standards Committee****Tuesday, 27 September 2016****7.30 pm****Present:**

Cllr Michael Wenban (Chair)

Councillors: Valerie Ashenden  
John Caller  
John Cubitt  
Leslie Hills  
David Turner

Mike Hayley Assistant Director (Governance & Law)  
Carlie Simmonds Committee Services Manager

**9. Apologies**

An apology for absence was received from Councillor Lesley Boycott (Vice-Chair).

**10. Minutes**

The Minutes of the meeting held on 27 July 2016 were signed by the Chair.

**11. Declarations of Interest**

No declarations of interest were made.

**12. Update on Appointment to the Independent Remuneration Panel**

Further to Minute 8 (27.07.2016), the Monitoring Officer advised that all of the applicants were written to and asked for further career details and why they felt that they met the constitutional criteria set out in paragraph 3 of the previous report. The following five applicants responded:-

- Jag Sidhu, Director of Nick Building Contractors Ltd;
- Idowu Anthony-Ajileye of Tonidol (UK) Ltd;
- Jasvinder Gill, Senior Partner of Hatten Wyatt Solicitors;
- Maxine Fothergill, Managing Director of Amax Estates (also an elected Member of the London Borough of Bexley);
- David Brown, Partner of Gullands Solicitors.

The Monitoring Officer informed the Committee that he was satisfied that the five applicants met the criteria and had sufficient standing and experience to serve as Members of the Independent Remuneration Panel and recommended that all five applicants be appointed especially in the light of the need to convene meetings of the Panel in the immediate future. Having five Members will provide the Council with some flexibility in setting up a Panel in the event that one or two Members are unable to attend. Also going forward Members of the Panel will be appointed for a four year term and should one or two Members wish to stand down the Panel will still be properly constituted and continue to function.

The Committee expressed concern regarding a potential conflict of interest as one of the applicants was currently an elected Member of the London Borough of Bexley and felt that it would be appropriate for this applicant not to be appointed to the Panel. The Committee felt that four Members would still provide the Council with the flexibility as referred to above.

The Committee reiterated that when the new Panel is constituted and reviews Members' Allowances, the Panel be given parameters/comparisons on a suitable increase.

**Resolved that** the Standards Committee recommends to Full Council that the following applicants be appointed to the Council's Independent Remuneration Panel:-

- Jag Sidhu;
- Idowu Anthony-Ajileye;
- Jasvinder Gill; and
- David Brown.

#### **Close of meeting**

The meeting ended at 7.48 pm

**Classification:** Public

**Key Decision:** No

### **Gravesham Borough Council**

**Report to:** STANDARDS COMMITTEE

**Date:** 1 AUGUST 2019

**Reporting officer:** PERRY HOLMES, MONITORING OFFICER

**Subject:** UPDATE ON A REVIEW OF LOCAL GOVERNMENT  
ETHICAL STANDARDS

#### **Purpose and summary of report:**

This report provides an overview of the key outcomes of the report published in January 2019 by the Committee on Standards in Public Life on the subject of ethical standards in local government.

#### **Recommendations:**

1. The Committee is asked to:
  - (i) Note the report, and
  - (ii) To authorise the Monitoring Officer to review and propose amendments to the Councillor Code of Conduct and its processes and procedures in order to comply with the best practice recommendations.

## **1. Budget and Policy Framework**

- 1.1 The Standards Committee is responsible for promoting and maintaining high standards of conduct by Councillors and voting co-optees serving on the Council Committees. The Committee has the power to advise, train or arrange training for Councillors and co-optees on matters relating to the Members' Code of Conduct.

## **2. Background**

- 2.1 The Committee on Standards in Public Life published its' 20<sup>th</sup> report in January 2019 on the subject of ethical standards in local government. The purpose of this report and the Highlights and Recommendations Report in Appendix 1 attached hereto is to provide the Standards Committee with a summary of the highlights of the report, the recommendations made to be actioned by central government and best practice recommendations to be actioned by local authorities.

- 2.2 Officers will report back to the Standards Committee in late 2019 on

proposed actions, along with a review of the Council's processes and procedures.

- 2.3 The Committee found that the vast majority of councillors and officers want to maintain the highest standards of conduct however a minority of councillors engage in bullying or harassment, or other highly disruptive behaviour. The Committee also found that a small number of parish councils give rise to a disproportionate number of complaints about poor behaviour.
- 2.4 The Committee raises concerns about a risk to standards under the current arrangements, as a result of the current rules around declaring interests, gifts and hospitality, and the increased complexity of local government decision-making. Whilst the consistency and independence of the system could be enhanced, there is no reason to reintroduce a centralised body, and local authorities should retain ultimate responsibility for implementing and applying the Seven Principles of Public Life in local government.
- 2.5 The Committee have made a number of recommendations and identified best practice to improve ethical standards in local government, these recommendations are made to government and to local authorities. In summary it is recommended that:
  - 2.5.1 an updated model code of conduct should be available to local authorities to enhance the consistency and quality of local authority codes.
  - 2.5.2 local authorities should be given the power to suspend councillors without allowances for up to 6 months, if agreed by the Independent Person that there has been a breach and that suspension is a proportionate sanction.
  - 2.5.3 the current criminal offences relating to Disclosable Pecuniary Interests are disproportionate and should be abolished.
  - 2.5.4 Parish Council's should be required to adopt the Code of Conduct of their principal authority.
- 2.6 The Committee will review the implementation of best practice recommendations for local authorities in 2020.

### **3. BACKGROUND PAPERS**

- 3.1 Code of Conduct contained within the Constitution and the attached Appendix 2 – Highlights and Recommendations – Review of the Local Government Ethical Standards (January 2019).

Anyone wishing to inspect background papers should, in the first place, be directed to Committee & Electoral Services who will make the necessary arrangements.

IMPLICATIONS	APPENDIX 1
<b>Legal</b>	The Committee on Standards in Public Life will review the implementation by local authorities of the best practice recommendations in 2020. The Council could suffer reputational damage and public lack of confidence if it does not fully comply with recommendations.
<b>Finance and Value for Money</b>	There are no financial implications arising from this report.
<b>Risk Assessment</b>	<p>Risk management is an integral part of good governance. The Council has a responsibility to identify and manage threats and risks to achieve its strategic objectives and enhance the value of services it provides to the community.</p> <p>A review of the Code of Conduct in accordance with the best practice recommendations will identify any necessary amendments to be proposed to the Standards Committee to ensure the Code is compliant and therefore minimise the risk of reputational damage arising.</p>
<b>Data Protection Impact Assessment</b>	<i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i>
	<p>a. Does the project/change being recommended through this paper involve the processing of <a href="#">personal data</a> or <a href="#">special category data</a> or <a href="#">criminal offence data</a>? A definition of each type of data can be found on the Information Commissioner's Office website via the above links.</p>
	<p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice? N/A</p>
	<p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at <a href="mailto:gdpr@medway.gov.uk">gdpr@medway.gov.uk</a>. N/A</p>
<b>Equality Impact Assessment</b>	<p>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No</p>
	<p>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. No</p>
	<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>
<b>Corporate Plan</b>	N/A
<b>Crime and Disorder</b>	N/A

<b>Digital and website implications</b>	N/A
<b>Safeguarding children and vulnerable adults</b>	N/A



**Committee on Standards in Public Life – Review of Local Government Ethical Standards (January 2019)**

**Highlights and recommendations**

This summary is comprised of 3 sections:

- A) highlights of the review,
- B) recommendations to Government and other responsible bodies to bring about change and
- C) best practice recommendations to local authorities.

**A. Highlights of the review**

1. This is the 20<sup>th</sup> report of the Committee and was not prompted by any specific allegations of misconduct, but to assure the committee that the current framework, particularly since the Localism Act 2011, is conducive to promoting and maintaining the standards expected by the public.
2. The following paragraphs provide a summary of the findings and an overview of discussions on particular areas including Code of Conduct, Independent Persons, sanctions, register of interests and parish councils.
3. The findings are summarised below:
  - a. The vast majority of councillors and officers want to maintain the highest standards of conduct.
  - b. A minority of councillors engage in bullying or harassment, or other highly disruptive behaviour.
  - c. A small number of parish councils give rise to a disproportionate number of complaints about poor behaviour.
  - d. Concerns arose about a risk to standards under the current arrangements, as a result of the current rules around declaring interests, gifts and hospitality, and the increased complexity of local government decision-making.
  - e. Whilst the consistency and independence of the system could be enhanced, there is no reason to reintroduce a centralised body, and that local authorities should retain ultimate responsibility for implementing and applying the Seven Principles of Public Life in local government.
  - f. The Committee have made a number of recommendations to government and identified best practice to improve ethical standards in local government. This includes recommendations that a number of changes should be made to primary legislation, which would be subject to Parliamentary timetabling.
  - g. The Committee will review the implementation by local authorities of the best practice recommendations in 2020.

4. **Code of Conduct:**

- a. Local Authorities are currently required to have in place a code of conduct of their choosing which outlines the behaviour required of councillors. There is considerable variation in the length, quality and clarity of codes of conduct creating confusion among the public and councillors. Many codes of conduct fail to address adequately important areas of behaviour such as social media use and bullying and harassment. An updated model code of conduct should therefore be available to local authorities to enhance the consistency and quality of local authority codes.
- b. There are benefits to local authorities being able to amend and have ownership of their own codes of conduct so the updated model code should be voluntary and able to be adapted by local authorities. The scope of the code of conduct should also be widened, with a rebuttable presumption that a councillor's public behaviour, including comments made on publicly accessible social media, is in their official capacity.
- c. Several new provisions are recommended to be included in the new model code of conduct:
  - i. Cllrs must not participate in a discussion or vote in a matter 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 that matter"*.
  - ii. prohibitions on bullying and harassment, including a definition of bullying and harassment (plus list of examples of the sort of behaviour covered).
  - iii. Councillors must comply with any formal standards investigation, and prohibiting trivial or malicious allegations by councillors.
- d. Local authorities should be required to establish a register of gifts and hospitality, with councillors required to record any gifts and hospitality received over a value of £50, or totalling £100 over a year from a single source.
- e. The criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished.
- f. The Code of Conduct should be reviewed annually and council should seek the views of the public, community organisations and neighbouring authorities.
- g. The Code of Conduct should be readily accessible – in prominent position on website and available in council offices.

- h. Straightforward and accessible guidance on how to make a complaint, the process for handling complaints and estimated timescales for investigations and outcomes should be on website.

5. **Register of Interests:** The following recommendations were made regarding Register of Interests:

- a. Cllrs should not be required to register their home address.
- b. Cllrs should register 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.
- c. Publish gifts and hospitality register at least quarterly and in an accessible format.

6. **Independent Persons (IP):**

- a. IP should be consulted on whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations the MO is minded to dismiss as being without merit, vexatious, or trivial.
- b. Local authorities should provide legal indemnity to Independent Persons if their views or advice are disclosed.
- c. IPs to be appointed for two year fixed term, renewable once.
- d. The view of the IP in relation to a decision on which they are consulted should be published in any formal decision notice.

7. **Sanctions**

- a. The current sanctions available to local authorities are insufficient which damages public confidence in the standards system and leaves local authorities with no means of enforcing lower level sanctions, nor of addressing serious or repeated misconduct.
- b. Local authorities should be given the power to suspend councillors, without allowances, for up to six months **but** only where the IP agrees both with the finding of a breach and that suspending the councillor would be a proportionate sanction.
- c. Government to clarify (and legislate if necessary) whether councils may lawfully bar councillors from council premises or withdraw facilities as sanctions.
- d. Councillors (including parish Cllrs) should be given the right to appeal to the LGO if suspended (but not for lesser sanctions). The LGO should be given the power to investigate and decide upon an allegation

of a code of conduct breach and the appropriate sanction - including the ability to overturn the suspension. The Ombudsman's decision to be binding on the local authority.

- e. After a decision has been made on an allegation of misconduct, should publish a decision notice asap on website - including brief statement of facts, the provisions of the code engaged by the allegations, the view of the IP, the reasoning of the decision-maker and any sanction applied.
- f. Requirement to publish annual report on number of complaints, what they relate to, outcomes and any sanctions applied.
- g. The current criminal offences relating to Disclosable Pecuniary Interests are disproportionate in principle and ineffective in practice, and should be abolished.

## **8. Parish Councils:**

- a. Parish council clerks should hold an appropriate qualification, such as those provided by the Society of Local Council Clerks.
- b. Parish Councils should be required to adopt the code of conduct of their principal authority and a principal authority's decision on sanctions for a parish councillor should be binding.
- c. 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.
- d. 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.

## **9. Miscellaneous**

- a. 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.
- b. Councils should report, as part of their annual governance statement, on separate bodies they have set up or which they own, and give a full picture of their relationship with those bodies.
- c. 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.

## **B. Recommendations**

This section sets out the full list of recommendations. The responsible body for the majority of these recommendations is central government.

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.
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.
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.
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.
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.
6. Local authorities should be required to establish a register of gifts and hospitality, with councillors required to record any 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.
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 that matter".
8. The Localism Act 2011 should be amended to require that Independent Persons are appointed for a fixed term of two years, renewable once.

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.
10. A local authority should only be able to suspend a councillor where the authority's Independent Person agrees both with the finding of a breach and that suspending the councillor would be a proportionate sanction.
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.
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.
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.
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.
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.
16. Local authorities should be given the power to suspend councillors, without allowances, for up to six months.
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.
18. The criminal offences in the Localism Act 2011 relating to Disclosable Pecuniary Interests should be abolished.
19. Parish council clerks should hold an appropriate qualification, such as those provided by the Society of Local Council Clerks.
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.

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.
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.
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.
24. Councillors should be listed as 'prescribed persons' for the purposes of the Public Interest Disclosure Act 1998.
25. Councillors should be required to attend formal induction training by their political groups. National parties should add such a requirement to their model group rules.
26. Local Government Association corporate peer reviews should also include consideration of a local authority's processes for maintaining ethical standards.

### **C. Best Practice Recommendations for local authorities**

This section sets out the best practice recommendations that are directed to local authorities. The Committee expects local authorities to fully implement them and intends to review the implementation of these in 2020.

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.
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.
3. Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.
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.
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.

6. Councils should publish a clear and straightforward public interest test against which allegations are filtered.
7. Local authorities should have access to at least two Independent Persons.
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 to dismiss as being without merit, vexatious, or trivial.
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.
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.
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.
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.
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 Officer from a different authority to undertake the investigation.
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.
15. Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.



**Classification:** Public

**Key Decision:** No

### Gravesham Borough Council

**Report to:** STANDARDS COMMITTEE

**Date:** 1 AUGUST 2019

**Reporting officer:** PERRY HOLMES, MONITORING OFFICER

**Subject:** EXCLUSION OF PRESS AND PUBLIC

#### **Purpose and summary of report:**

This report summarises the content of the report at agenda item 9 which, in the opinion of the proper officer, contains exempt information within one of the categories in Schedule 12A of the Local Government Act 1972. It is a matter for the Committee to determine whether the press and public should be excluded from the meeting during consideration of this document.

#### **Recommendations:**

1. The Committee is required to decide whether to exclude the press and public during consideration of the following document because consideration of this matter in public would disclose information falling within one of the descriptions of exempt information contained in Schedule 12A to the Local Government Act 1972, as specified below, and, in all the circumstances of the case, the public interest in maintaining the exemption, outweighs the public interest in disclosing the information.

<b>Report Title</b>	Complaint SC/2019/001
<b>Agenda Item</b>	
<b>Summary</b>	This report sets out a complaint relating to Councillor conduct.
<b>Category of exempt information (Schedule 12A of the Local Government Act 1972)</b>	Not for publication under paragraphs 1 and 2 of Schedule 12A of the Local Government Act 1972 – Information relating to any individual and Information which is likely to reveal the identity of an individual.

**Lead Officer Contact:**

**Perry Holmes, Monitoring Officer**

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**Appendices:**

None

IMPLICATIONS	APPENDIX 1
<b>Legal</b>	The report contains exempt information within one of the categories in Schedule 12A of the Local Government ACt 1972 and it is a matter for the Committee to determine whether the press and public should be excluded from the meeting during consideration of this document.
<b>Finance and Value for Money</b>	There are no financial implications.
<b>Risk Assessment</b>	N/A
<b>Data Protection Impact Assessment</b>	<p><i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i></p> <p>a. Does the project/change being recommended through this paper involve the processing of <a href="#">personal data</a> or <a href="#">special category data</a> or <a href="#">criminal offence data</a>? A definition of each type of data can be found on the Information Commissioner’s Office website via the above links.</p> <p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice? N/A</p> <p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at <a href="mailto:gdpr@medway.gov.uk">gdpr@medway.gov.uk</a>. N/A</p>
<b>Equality Impact Assessment</b>	<p>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No</p> <p>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. No</p> <p><i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i></p>
<b>Corporate Plan</b>	N/A
<b>Crime and Disorder</b>	N/A
<b>Digital and website implications</b>	N/A
<b>Safeguarding children and vulnerable adults</b>	N/A

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