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|  Council 21 August 2013 | | Agenda Item No. 4 |
| Title | Code of Conduct Complaint | |
| For further information about this report please contact | Graham Leach, Deputy Monitoring Officer | |
| Wards of the District directly affected | Warwick West | |
| Is the report private and confidential and not for publication by virtue of a paragraph of schedule 12A of the Local Government Act 1972, following the Local Government (Access to Information) (Variation) Order 2006? | No | |
| Date and meeting when issue was last considered and relevant minute number | | |
| Background Papers | | |

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| Contrary to the policy framework: | No |
| Contrary to the budgetary framework: | No |
| Key Decision? | No |
| Included within the Forward Plan? (If yes include reference number) | No |
| Equality & Sustainability Impact Assessment Undertaken | No |

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|---|-------------|--------------|
| Officer/Councillor Approval | | |
| Officer Approval | Date | Name |
| Chief Executive | | N/A |
| Head of Service | | N/A |
| CMT | | N/A |
| Section 151 Officer | | N/A |
| Monitoring Officer | 12/8/2013 | Graham Leach |
| Finance | | N/A |
| Portfolio Holder(s) | | N/A |
| Consultation & Community Engagement | | |
| The report was produced by Greta Needham, Head of Law & Governance at Warwickshire County Council under authorisation of the Deputy Monitoring Officer. | | |
| Final Decision? | Yes | |
| Suggested next steps (if not final decision please set out below) | | |
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1. **SUMMARY**

- 1.1 The Council is asked to consider the facts set out in this report in its role as parent body to the Standards Committee and the Hearing Sub-Committee, to reach a decision as to whether there has been a breach of the Council's Code of Conduct governing the behaviour of elected members, and if so, what action should be taken.
- 1.2 The Council is being asked to consider this matter in view of the seriousness of the complaint and the need for the appropriate level of response and reassurance to the public.

2. **RECOMMENDATION**

- 2.1 That the Council considers the facts set out in this report relating to the conduct of Cllr Prabhjiet "Bob" Dhillon'; determines whether there has been a breach of the Council's Code of Conduct, and makes any consequent decision as to the action it considers appropriate in the light of the powers available to it under the Localism Act 2011 and set out in paragraph 3.10 of this report.

3. **REASONS FOR THE RECOMMENDATION**

- 3.0 This report is brought at the request of Group Leaders (Councillors Barrott, Boad, Doody and MacKay) due to the seriousness of the complaint by Greta Needham, Head of Law & Governance at Warwickshire County Council.

The facts

- 3.1 On 18 July, the Chief Executive received a letter from Andrew Jones in his capacity as the Council's Monitoring Officer and a member of the Council's Corporate Management Team, requesting urgent action to address the unacceptable conduct of Councillor Dhillon during a call-in discussion relating to the Executive decision on the St Mary's Lands Business Strategy at the Council's Overview and Scrutiny Committee on 9 July 2013. At that public meeting, Councillor Dhillon had directed remarks at Andrew Jones and another officer and member that Andrew Jones found intimidating and bullying; that questioned his integrity and the integrity of others; that failed to show respect to colleagues and that potentially brought the Council into disrepute. These remarks are highlighted in **Appendix 1** to this report.
- 3.2 The Monitoring Officer shared his letter to the Chief Executive with the Group Leaders and Deputy Leader on 18 July on the basis that its contents should be of concern to the Council as a whole. He also put on record the fact that his health and wellbeing had been affected by Councillor Dhillon's conduct.
- 3.3 The Monitoring Officer only made the decision to seek action through the Chief Executive after he had received an unsatisfactory response from Councillor Dhillon (**Appendix 2**) to the email he had sent to him on 10 July (**Appendix 1**) seeking informal resolution of the matter by way of a personal apology for the public remarks the councillor had made.
- 3.4 The remarks made by Councillor Dhillon on 9 July are a matter of public record and were heard by Councillors Edwards, Mrs Knight, Wilkinson and Gifford. Councillor Dhillon has already admitted in his email attached at **Appendix 2** that the words were spoken.

- 3.5 As Cllr Dhillon's remarks publicly questioned Andrew Jones' integrity, it was his view that it would be impossible for him to fulfil his role as Monitoring Officer if the Council and the public at large were left under any doubt that he was not committed to acting in accordance with the word and spirit of the Nolan principles of Public Life. The Monitoring Officer is not prepared to allow any potentially defamatory remarks to put in doubt the trust he has built with members and the public or to undermine his reputation. The impact of Councillor Dhillon's behaviour on the Monitoring Officer is such that he has also felt it necessary to seek personal legal advice on this matter.
- 3.6 Councillor Dhillon's remarks not only questioned the integrity of the Monitoring Officer, but they also brought potential damage to the wider Council reputation.
- 3.7 Councillor Dhillon was first elected to office as a Councillor of Warwick District Council on 3 May 2007 for a period of 4 years, and again on 5 May 2011. He gave a written undertaking to observe the Code of Conduct adopted by the Council in May 2007 and again in May 2011. At the time of the incident which is the subject of this report, he was a District Councillor. He was acting in his official capacity as a councillor and was therefore bound by the Code of Conduct.

The Process

- 3.8 The decision has been made by the Deputy Monitoring Officer that this matter is sufficiently serious for it to be considered by the Council as the parent body of the Standards Committee. The matter will be considered in accordance with the attached procedure (**Appendix 4**).
- 3.9 The Council is under a statutory requirement to consult an independent person before making a decision on a breach of the Code of Conduct. The independent person who has been consulted on this case is Robert Meacham. He will be present at the Council meeting and will be invited to express his views on the matter before the Council moves to a vote. Cllr Dhillon, the subject of the complaint, will be given the opportunity to refute the report and make representations.
- 3.10 In the event of finding a breach of the Code of Conduct by members in this matter, the range of powers available to the Council are as follows:
- To publish its findings in respect of the member's conduct;
 - To send the decision of this Council in writing to the Clerk to the Warwick Town Council (as the proper Officer of that Council) so that they are aware of the decision of this Council;
 - Formal censure by motion
 - To require the member to apologise to the Council, in a meeting of the Full Council, including and explanation for their action;
 - To recommend to the member's Group Leader that they be removed from any or all Committees or Sub-Committees of the Council;
 - To recommend to the Leader of the Council that the member be removed from the executive, or removed from particular Portfolio responsibilities;

- To instruct the Monitoring Officer to arrange training for the member, half of the cost of which the member will be required to meet;
- To remove or recommend to the Parish/Town Council that the member be removed from all outside appointments to which they have been appointed/nominated by the authority or by the Parish/Town Council;
- To withdraw or recommend to the Parish/Town Council that it withdraws facilities provided to the member by the Council, such as a computer, website and/or email and Internet access; or
- To exclude or recommend that the Parish/Town Council exclude the member from the Council's offices or other premises, with the exception of meeting rooms as necessary for attending Council, Committee and Sub-Committee meetings.

3.11 The Council will wish to bear in mind that on 7 September 2011, the Hearing Sub-Committee heard a similar complaint against Councillor Dhillon regarding comments made by him at committee meetings open to the public. The Sub-Committee found on that occasion that Councillor Dhillon had failed to comply with the Code of Conduct adopted by the Council in that he had failed to treat officers with respect and that his conduct amounted to the bullying of officers. A copy of the Decision Notice LSF.09.2010 dated 8 September 2011 is attached as **Appendix 5**.

4. **POLICY FRAMEWORK**

4.1 The Localism Act 2011 abolished the Standards Board and the National Code of Conduct, and radically slimmed down the Standards Regime. Standards are now a matter for local Councils to deal with in accordance with the Council's own adopted arrangements. The sanctions available to the Council where a breach of the Code of Conduct is found are reduced.

4.2 Section 27 of the Localism Act 2011 imposes a general duty on local authorities to promote high standards of conduct. Under Section 28 of the Act, the Council must adopt a local Code of Conduct and have in place arrangements to allow breaches of the Code to be investigated and for decisions to be made in response to such investigations. There is also a duty to ensure that arrangements are in place for an independent person's views to be sought and taken into account by the authority before it makes its decision on an allegation it is investigating.

4.3 This Council adopted a revised Code of Conduct in June 2012 (**Appendix 3**) and has in place its own Arrangements for Dealing with Complaints.

4.4 The adopted Code of Conduct applies at all times when an individual is acting as a member of Warwick District Council. It is a commitment by all members that they will behave in a manner that is consistent with the seven 'Nolan' Principles of Public Life designed to maintain public confidence in local authorities. With particular reference to this case, the Code is a commitment by all members to value and respect colleagues and staff and to engage with them in an appropriate manner and one that underpins the mutual respect that is essential to good local government. It is also a commitment by every member to always treat people with respect; never to intimidate or attempt to intimidate, or bully any person, and to recognize that failure to adhere to the Code could bring the office of councillor or the Council into disrepute.

5. **BUDGETARY FRAMEWORK**

- 5.1 This matter is being dealt with in accordance with the budgetary framework as agreed by this Council.

6. **ALTERNATIVE OPTION(S) CONSIDERED**

- 6.1 No alternative options have been considered. This matter is deemed sufficiently serious as to require urgent resolution by the Council in its role as the parent Committee of the Standards Committee.

From: Andrew Jones
Sent: 10 July 2013 09:12
To: Bob Dhillon
Cc: o&scommittee; Executive; John Barrott; Alan Boad; Bertie MacKay; CMT; Graham Leach
Subject: Overview & Scrutiny Committee 9th July 2013

Dear Councillor Dhillon

I am writing to you in connection with remarks you made at Overview & Scrutiny Committee yesterday evening which require urgent explanation.

Agenda item 10 of Overview & Scrutiny Committee was "Call-in of Executive Decisions". The second part of this item was consideration of the Executive decision in respect of "St Mary's Lands Business Strategy". The Committee was required to make a decision in respect of three options. You proposed that the decision the Committee should reach was "to refer the decision to the Council for debate". However, this proposal was lost by 5 votes to three. Following the vote, Graham Leach advised that the Committee still needed to make a decision in respect of the remaining two options. At this point you intervened and said that the matter should go to Council and also said **"what have you got to be scared of Andrew?"**

Councillor Boad then intervened and advised the Committee that the Executive had agreed to take on board the recommendations of the Overview & Scrutiny Committee and the Committee was going to "look a bit silly" if despite responding to the Committee's concerns, new matters were then raised. Councillor Boad proposed that no further action should be taken in respect of the matter (option 1).

At this point you got up from your seat and stated **"How much did they pay you"**. This remark was directed towards the area where Councillor Blacklock, Graham and I were sitting and given your previous comment to me, and the clarification I had provided during the course of the debate, a reasonable onlooker may have concluded that the remark was directed at me.

As you know, Overview & Scrutiny Committee is a public meeting. I had to remind you at the previous two Committee meetings of the importance of being careful with what you say but this latest remark has overstepped the mark. I spoke with two Councillors last night who were able to confirm that I had not misheard your remark.

Therefore, I need an urgent explanation of what you meant by your remark to allow me to determine what next steps should be taken both in terms of protecting the integrity of the Council and the reputation of the person or persons at whom the remark was directed.

Finally, I have copied-in a number of Councillors and Officers to this e-mail as there can be no rumour or suggestion that officers or Members consider there was any truth in your remark.

Yours sincerely

Andrew Jones
Deputy Chief Executive & Monitoring Officer

12 July 2013

Andrew,

As you know that I and others are concerned that the group reviewing the future of St Marys Land seem to reach their conclusions without the benefit of a formal agenda or report.

As I left the meeting I was thinking what the general public might think of a proposal that appears to so benefit the racecourse over the community and I must have expressed those thoughts out loud.

It was merely coincidental that I was looking in the direction of the Chair Ann Blacklock and WDC officers.

The remarks were no way aimed at the WDC officers in any way

Regards

Bob Dhillon

Warwick District Council Code of Conduct

Part A – General Obligations

As a member or co-opted member of Warwick District Council, I have a responsibility to represent the community and work constructively with our staff and partner organisations to secure better social, economic and environmental outcomes for all.

I recognise that this Code of Conduct will apply at all times when I am acting as a member of Warwick District Council and I recognise that failure to adhere to this Code could result in the issuing of sanctions against me.

In accordance with the Localism Act provisions, when acting in this capacity I am committed to behaving in a manner that is consistent with the following principles to achieve best value for our residents and maintain public confidence in this authority:

SELFLESSNESS: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP: Holders of public office should promote and support these principles by leadership and example.

As a Member of Warwick District Council, my conduct will in particular address the principles of the Code of Conduct by:

- Championing the needs of residents – the whole community and in a special way my constituents, including those who did not vote for me - and putting their interests first.
- Dealing with representations or enquiries from residents, members of our communities and visitors fairly, appropriately and impartially.
- Not allowing other pressures, including the financial interests of myself or others connected to me, to deter me from pursuing constituents' casework, the interests of the authority or the good governance of the authority in a proper manner.
- Recognising that all parties are equal and my position is one of privilege and not one that should be used to secure advantage or disadvantage for any party.
- Exercising independent judgement and not compromising my position by placing myself under obligations to outside individuals or organisations who might seek to influence the way I perform my duties as a member/co-opted member of this authority.
- Listening to and respecting the interests of all parties, including relevant advice from statutory and other professional officers, taking all relevant information into consideration, remaining objective, making decisions on merit and providing reasons for the decisions taken.
- Being accountable for my decisions and co-operating when scrutinised internally and externally, including by local residents.
- Contributing to making this authority's decision-making processes as open and transparent as possible to enable residents to understand the reasoning behind those decisions and to be informed when holding me and other members to account.
- Never disclosing information given to me in confidence by anyone, or information acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, except where:
 - (1) I have the consent of a person authorised to give it;
 - (2) I am required by law to do so; and
 - (3) 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
 - (4) 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 authority.

- Behaving in accordance with all my legal obligations, alongside any requirements contained within this Council's policies, protocols and procedures, including those on the use of the Council's resources (which shall never be for political purposes).
- Valuing and respecting my colleagues and staff and engaging with them in an appropriate manner and one that underpins the mutual respect between us that is essential to good local government.
- Always treating people with respect, including the organisations and public I engage with and those I work alongside, both officers and fellow Members.
- Providing leadership through behaving in accordance with the principles of this Code when championing the interests of the community with other organisations as well as within this Council.
- Never intimidating or attempting to intimidate, or bully any person.
- Never doing anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the Council.
- Recognising that by failing to adhere to the Code, I could bring my office or Council into disrepute.

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| 1 | The Chairman explains that the purpose is to consider a complaint regarding the Conduct of Warwick District Councillor Bob Dhillon. | |
| 2 | The Chairman introduces the Independent Person | |
| 3 | The Chairman asks (a) all to confirm that they have read the agenda for the meeting; and (b) all to confirm they accept the outlined procedure for the Hearing. | |
| 4 | The Chairman asks its Legal Advisor, Mrs Needham to outline pertinent matters within the report. | |
| 5 | The Chairman asks Councillor Dhillon to make any representations on the matter | |
| 6 | The Chairman asks the Council if they have any questions for Councillor Dhillon on this matter | |
| 7 | Councillor Dhillon is asked to respond to appropriate questions by the Chairman | |
| 8 | The Chairman asks the Independent Person (Mr Meacham) for his views on the case before the Council decide if a breach of the Code has occurred. | |
| 9 | The Council decide if they feel there has been a breach of the Code of Conduct or not. If they feel there has been a breach of the Code of Conduct they must outline which aspects of the Code they feel have been breached | |

No Breach of the Code

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| 10 | The Chairman will close the meeting after explaining the arrangements for the decision notice | |
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OR
Breach of the Code

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| 10A | The Chairman outlines the next steps with regard to the potential sanctions | |
| 11 | Invites Mrs Needham to make any representations on the matter of sanctions | |
| 12 | The Chairman asks Councillor Dhillon if he has any representations he would like to make on the matter of sanctions (including calling any character witnesses) | |
| 13 | The Council determines any potential sanctions for Councillor Dhillon based upon the evidence received and submissions it has received | |



WARWICK DISTRICT COUNCIL CODE OF CONDUCT HEARING DECISION NOTICE

Case Reference LSF. 09. 2010

Complaint

On 7 September 2011, a meeting was held of the Hearing Sub-Committee of Warwick District Council's Standards Committee consisting of Mr C Bennett (Chairman), Councillor R Davies, Councillor Mrs A Gordon and Councillor Mrs S Tyrrell. Apologies for absence were received from Mr P Willers.

The Sub-Committee were supported by Mr G Leach, the Clerk to the Committee, and Ms J Pollard, Solicitor acting for the Council. Also present were the Monitoring Officer Mr A Jones, the Investigating Officer Mr P Keith-Lucas, the respondent Councillor Prabhjiet (Bob) Dhillon and his representative Mr J Hathaway.

The Hearing Sub-Committee considered a complaint, by Mr C Elliott, Chief Executive of Warwick District Council, that had been investigated related to comments Councillor Dhillon had made about officers in emails and at committee meetings open to the public which the complainant felt showed bullying behaviour and a general lack of respect.

The complaint had been considered by an Assessment Sub-Committee on 3 September 2010 and had been referred for investigation by an independent investigator. The investigator had submitted his report in April 2011 and it was determined by a Consideration Sub-Committee in May 2011 that a hearing was required. The hearing had been delayed until September to enable the pre hearing process to be completed with the respondent.

The findings of the Investigator's report were that Councillor Dhillon had failed to comply with the Code of Conduct adopted by the Council in that Councillor Dhillon was in breach of Paragraph 3(1) for failing to treat officers with respect and also Paragraph 3(2) for conduct which amounted to bullying of officers.

FINDINGS OF FACT

On consideration of the investigating officer's report, the Sub Committee made the following findings of fact:

Councillor Prabhjiet (known as 'Bob') Dhillon was first elected to office as a councillor of the Warwick District Council on 3 May 2007 for a period of four years and again on 5 May 2011. He represents the Warwick West Ward.

Councillor Dhillon gave a written undertaking to observe the Code of Conduct adopted by the District Council in May 2007 and again in May 2011.

The Council had adopted the revised Model Code of Conduct which was amended by the Council during 2010.

The Code provides;

3(1) You must treat others with respect

3(2) You must not –

(b) bully any person

5 You must not conduct yourself in a manner which might reasonably be regarded as bringing your office or authority into disrepute

It was alleged that between September 2008 and August 2010 that a number of incidents took place which breached one or more of those provisions.

At the time of the alleged incidents set out in the Investigator's report Councillor Dhillon was a District councillor.

In relation to incidents one and two set out in the Investigators report the Sub-Committee made no findings of fact because those incidents occurred more than 12 months before the complaint was made.

In relation to incidents three, four, six and seven (there was no incident five), the facts were not disputed and the Sub-Committee were satisfied based on the information contained in the Investigator's report and the submissions made to them that the incidents took place as set out in the report.

Councillor Dhillon was acting in his official capacity as a Councillor and was therefore bound by the Council's Code of Conduct in relation to those incidents.

After consideration of the guidance from Standards for England with regard to conduct that may amount to a failure to treat others with respect and or bullying and the submissions made in relation to each incident the Sub-Committee made the following findings:

Incident three

The false allegations, made in the email of 18 September 2009, that officers knowingly falsified a response to statutory consultation and deliberately misled the Planning Committee was a failure to treat officers, with respect, contrary to Paragraph 3(1) of the Code of Conduct. Councillor Dhillon made no attempt to check his facts before making these allegations to the Chair of the Planning Committee. He further aggravated the situation by sending the email of 18 September to a number of other people and included threats to go to the press and make further allegations.

Incident four

It was considered that the email sent to officers on 13 October 2009 and copied to a number of other people, was not an ideal approach and one the Sub-Committee would not recommend Councillors to adopt. However, it was considered the comments fell within robust criticism rather than disrespect for the purposes of the code.

Incident five –does not exist.

Incident six

This again was a set of circumstances where Councillor Dhillon in a public forum made unsubstantiated allegations of misconduct and/or incompetence against officers. On his own admission, he had no basis for his believing his allegations. In particular the Sub-Committee noted that the allegations included dishonest behaviour by officers through the suggestion that officers had destroyed relevant documents. This was a clear lack of respect for the officers concerned contrary to paragraph 3(1) of the Code of Conduct.

Incident seven

The Sub-Committee agreed with the conclusions of the Investigating Officer that the email of 4 August 2010 was confrontational and unreasonable. It was also offensive and threatening. No attempt was made to check facts or to provide constructive criticism and Councillor Dhillon again increased the number of people to whom it was circulated. Therefore it showed a clear lack of respect for the officers concerned contrary to paragraph 3(1) of the Code of Conduct.

The Sub-Committee also considered incidents three, four, six and seven collectively and although there were elements of bullying behaviour within that pattern they felt that the behaviour was just short of a breach of the code with regard to bullying.

DECISION

Having considered the findings of fact and the representations made to the Sub-Committee, they considered that the conduct of Councillor Dhillon merited the following sanctions –

- (1) A written apology in a form to be agreed with the Chair of the Sub-Committee to be made to the Chief Executive and other officers who have had their integrity questioned, within 2 weeks of today; and
- (2) That Councillor Dhillon be suspended from membership of all Warwick District Council Committees of which he is a member for a period of two months, to start on 1 March 2012, unless Councillor Dhillon has undertaken appropriate interpersonal skills training by that time. The training is to be agreed, in writing, by the Chair of this Sub-Committee and the Monitoring Officer.

In addition the Sub-Committee made a general recommendation to the Monitoring Officer to take all necessary steps to make all Councillors aware of the Member/Officer Protocol.

REASONS FOR DECISION

The Sub-Committee recognised these incidents as poor behaviour which fell just short of breaching the Code of Conduct for bullying and did breach the Code of Conduct with regard to treating others with respect. Therefore sanctions were merited.

The Sub-Committee recognised the commitment and enthusiasm of Councillor Dhillon to his work as a Councillor and recognised the impact a full suspension would have on this work but at the same time felt that some form of suspension could be merited.

The Sub-Committee felt that these sanctions were the most appropriate because the apology should provide a new start with officers and move towards rebuilding trust and an effective working relationship for the betterment of the District.

The Sub-Committee imposed a period of partial suspension because of the need to indicate the seriousness of the poor behaviour of the Councillor. However, the Sub-Committee considered that Councillor Dhillon would benefit from appropriate training in interpersonal skills in helping him to manage how he responds to situations and, should he undertake this training by 1 March 2012 the period for partial suspension would not take effect.

The Sub-Committee felt the general recommendation to the Monitoring Officer was necessary because, while the Council had a well developed training programme, the Member/Officer Protocol was key to good relationships between officers and

Councillors and it would benefit all Councillors to be reminded of their responsibilities on these matters and the effect this could have on the delivery of services and the wellbeing of the staff that the Council employs.

RIGHT OF APPEAL

Councillor Dhillon, as respondent, may appeal to the President of the First Tier Tribunal against this decision within 21 days of the date of being notified of the decision.

TERMS OF REFERENCE

The Local Government and Public Involvement in Health Act 2007 amended the Local Government Act 2000, which provided for the local assessment of new complaints that members of relevant authorities may have breached the Code of Conduct. The Standards Committee (England) Regulations 2008 make provision for the investigation and determination of such complaints by setting out the framework for the operation of a locally based system for the assessment, referral, investigation and determination of complaints of misconduct by members of authorities.

ADDITIONAL HELP

If you need additional support in relation to this or future contact with us, please let us know as soon as possible. If you have difficulty reading this notice we can make reasonable adjustments to assist you, in line with the requirements of the Equality Act 2010.

Mr C Bennett
Chairman of the Hearing Sub-Committee
8 September 2011