

Standards Committee

Agenda 19 March 2026

10.00am

Yare House, 62-64 Thorpe Road, Norwich NR1 1RY

John Packman, Chief Executive – Thursday, 12 March 2026

Under the Openness of Local Government Bodies Regulations (2014), filming, photographing and making an audio recording of public meetings is permitted. These activities however, must not disrupt the meeting. Further details can be found on the [Filming, photography and recording of public meetings](#) page.

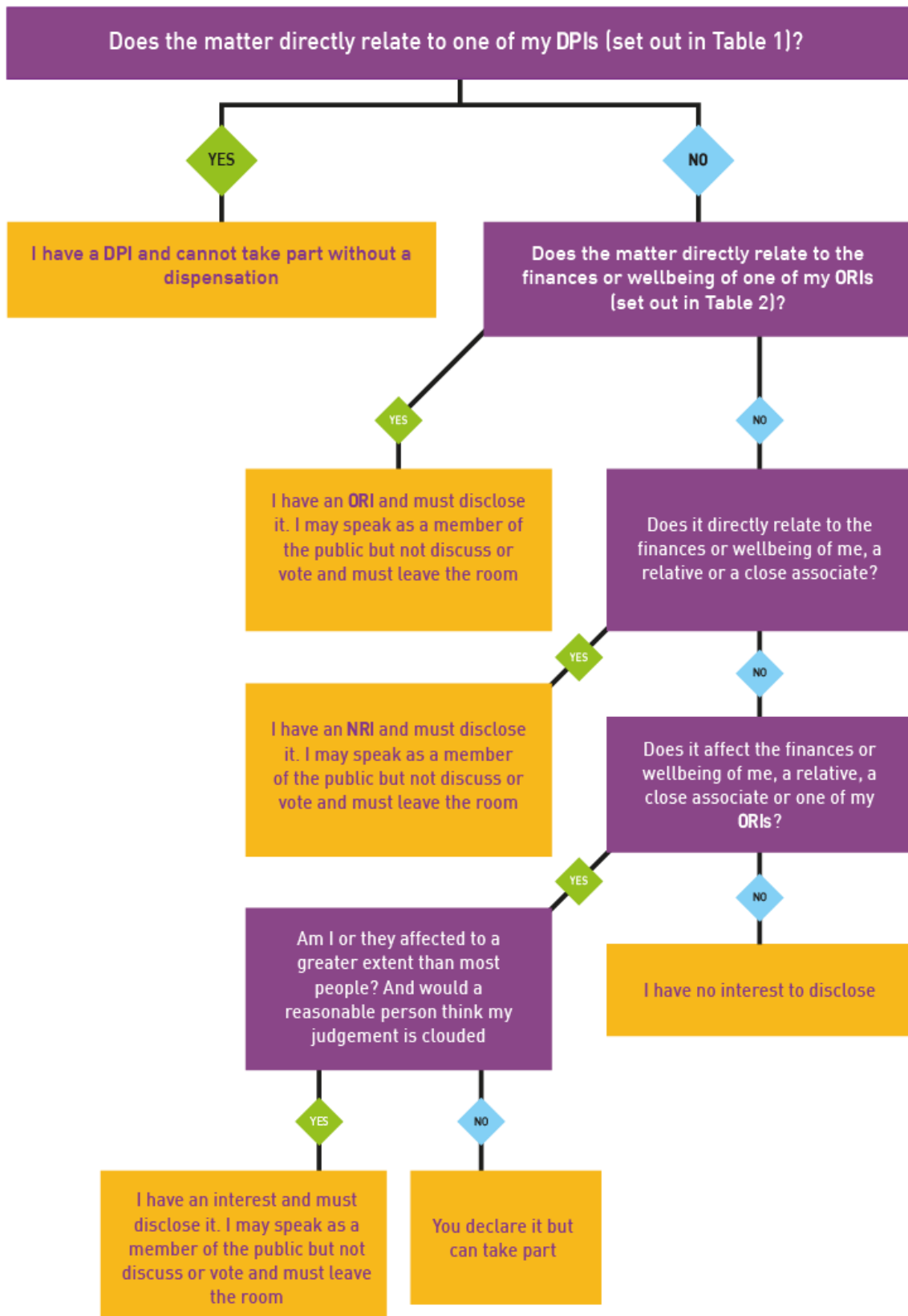
Introduction

1. To receive apologies for absence
2. **Appointment of Chair**
A nomination for Chair has been received for:
Stephen Bolt proposed by Tim Jickells, seconded by Andrée Gee
3. **Appointment of Vice-Chair**
4. Chair's announcements
5. To receive declarations of interest (see Appendix 1 to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
6. To note whether any items have been proposed as matters of urgent business
7. **To receive and confirm the minutes of the Standards Committee meeting held on 20 February 2025** (Pages 4-12)
8. **Proposed amendment to Member Code of Conduct - interests of Navigation Committee members** (Pages 13-16)
Report by Monitoring Officer
9. **Creating a framework for Member engagement with operational staff** (Pages 17-20)
Report by Head of Governance
10. **Update on the consultation on strengthening the standards and conduct framework for local authorities in England** (Pages 21-25)
Report by Monitoring Officer and Head of Governance

11. Other items of business
Items of business which the chairman decides should be considered as a matter of urgency pursuant to section 100B (4)(b) of the Local Government Act 1972
12. To note the date of the next meeting – **Thursday, 11 March 2027** at 10.00am at Yare House, 62-64 Thorpe Road, Norwich NR1 1RY.
13. Exclusion of the public
The Authority is asked to consider exclusion of the public from the meeting under Section 100A of the Local Government Act 1972 for the consideration of the item below on the grounds that it involves the likely disclosure of exempt information as defined by Paragraphs 1 and 2 of Part 1 of Schedule 12A to the Act as amended, and that the public interest in maintaining the exemption outweighs the public benefit in disclosing the information.
14. **Member training – monitoring report** (Pages 26-28)
Report by Head of Governance

For further information about this meeting please contact the [Governance team](#)

Appendix 1 – Extract from the Local Government Association Model Councillor Code of Conduct



Standards Committee

Minutes of the meeting held on 20 February 2025

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Please note these are draft minutes and will not be confirmed until the next meeting.

Present

Stephen Bolt – in the Chair (from item 2 on the agenda), Andrée Gee, Paul Hayden, Tim Jickells.

In attendance

John Packman – Chief Executive, Jonathan Goolden – Monitoring Officer, Emma Krelle – Director of Finance, Lorraine Taylor – Governance Officer, and Sara Utting – Senior Governance Officer.

1. Welcome and apologies

The Chief Executive welcomed everyone to the meeting.

Openness of Local Government Bodies Regulations 2014

The Chief Executive explained that the meeting was being audio-recorded. All recordings remained the copyright of the Broads Authority and anyone wishing to receive a copy should contact the Governance Team. The minutes remained the record of the meeting. He added that the law permitted any person to film, record, photograph or use social media in order to report on the proceedings of public meetings of the Authority. This did not extend to live verbal commentary. The Chair needed to be informed if anyone intended to photograph, record or film so that any person under the age of 18 or members of the public not wishing to be filmed or photographed could be accommodated.

Apologies were received from Peter Dixon and Gurpreet Padda.

2. Appointment of Chair

Stephen Bolt was proposed by Tim Jickells and seconded by Paul Hayden.

There being no other nominations Stephen Bolt was appointed Chair of the Standards Committee for the forthcoming year.

Stephen Bolt took the Chair.

3. Appointment of Vice-Chair

Tim Jickells was proposed by Paul Hayden and seconded by Andrée Gee.

There being no other nominations Tim Jickells was appointed Vice-Chair of the Standards Committee for the forthcoming year.

4. Chair's announcements

There were no change in order of agenda items.

5. Declarations of interest

Members indicated they had no further declarations of interest other than those already registered.

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6. Items of urgent business

There were no items of urgent business.

7. Minutes of last meeting

The minutes of the meeting held on 21 June 2024 were approved as a correct record and signed by the Chair.

8. Consultation on Strengthening the standards and conduct framework for local authorities in England title

Members received the report of the Monitoring Officer (MO). The MO said that it was hoped that the Standards Committee would only need to meet once a year, however, Code of Conduct issues were low-incidence, high-impact issues. He added that very robust systems had been set up but it was hoped that these would never be used. Much of the ability to not use those systems laid within the informal advice, guidance, and good chairing of meetings.

The MO said that, as Members would be aware, the Ministry of Housing, Communities and Local Government (MHCLG) had expressed the view that the current standards framework for English local authorities (which included the Broads Authority) was inadequate, and it was holding a consultation exercise on strengthening it. Changes made by the Localism Act 2011 to the English standards framework had removed the then national regulator, the appeals body and the ability to suspend or remove members from office.

Research undertaken by had established that local authority members in England were the most lightly regulated of any comparable European or Commonwealth country and less regulated than MPs. Many sector bodies including the Committee for Standards in Public Life, Lawyers in Local Government, the National Association of Local Councils, the Society of Local Council Clerks, CIPFA, Solace and the Jo Cox Foundation had called for the restoration of effective sanctions as part of combating rising intimidation and incivility in public life.

The MO had attended a round table discussion of the proposals with local government Minister Jim McMahon. There had been over 1,400 responses to the consultation so far. There appeared to be a desire for a national code, perhaps with some local flexibility to add to it, with assessment of complaints and hearings to take place locally but with a national appeal body for suspensions and disqualifications. It was likely that the Government would require that Standards Committees had some degree of co-opted independent members.

The consultation did not ask whether the code should extend to aspects of the private lives of members. In England and Scotland, the code only applied when a member was acting in that role (though the LGA model code referred to it applying when a member reasonably appeared to be acting as such). The MO said that in Wales, the code applied to actions outside the role of a member if that brought the member's office or authority into disrepute, however, it was sometimes hard to know when a member was acting as such when posting on social media and these cases were often the most damaging to the reputation of the local authority concerned.

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The consultation questions and proposed responses were set out in Appendix 1 of the report. The MO went through each of the questions and explained the proposed responses. The MO said that if Members had any questions, disagreed with any of the responses, or thought that something should be added, they should stop the MO at that point.

Question 3 – A Member commented that when members, appointed by local authorities, were asked to introduce themselves, they stated that they represented a particular local authority, but in actual fact the member was appointed to the Broads Authority and did not represent the interests of the local authority. The Chief Executive (CE) said that it was difficult for local authority members, particularly around planning, where they felt they represented the local inhabitants, however, they were there to make decisions in the best interests of the Broads Authority. The MO said that there was merit to point out to the Ministry that National Park members were different to those of a local authority and were not elected. A Member, as a local authority appointee, commented that they always voted for what was right for the Broads Authority. Local authority appointees acted as a conduit between the Broads Authority and the appointing local authority and provided regular reports back on what had been happening at the Broads Authority.

A Member asked whether there were any checks and balances as to what could be added or taken out of the code. The MO said that there was some debate on this matter in the ministerial round table and it was acceptable to add to the code, but not detract. The MO thought that a National Code would be produced with added guidance.

Question 6 – The CE asked for clarification on what a Principal Authority was. The MO explained that Principal Authorities were the district and county councils, and unitary authorities but that National Park authorities were (together with Principal Authorities) all ‘Relevant Authorities’ covered by the consultation.

Question 9 – Although the ‘yes’ box had been checked, the MO thought that the Independent Person (IP) should not chair the Standards Committee. It was important that the IP remained independent to provide the assurance that processes were being conducted fairly and properly. There was, however, merit for the Standards Committee to be chaired by an independent lay member, which would be an entirely different role from that of the IP. A Member commented that he did not think that the IP should be the Chair of the Standards Committee. A Member commented that it would be healthy for an independent lay member to be part of the Standards Committee. The MO said that one of the things that the current system did well was the ability to filter out the vexatious complaints because the decision making was done by the MO in consultation with the IP who applied an objective set of criteria.

It was agreed that the MO should change the answer on question 9 from ‘yes’ to ‘no’. The MO explained that at question 10, there was a text box which would enable him to set out the Members’ views regarding the IP and a lay member.

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Question 12 – A Member commented that if a Member resigned, it would then be possible for them to say that they were no longer bound by the Code of Conduct and therefore would not have to co-operate with any hearing.

Question 17 – The MO said that Members might wish to add to comments to suggest that those who raise a complaint should be given the same protections as those within the Authority's Whistleblowing Policy. The CE said that the Broads Authority had a welfare helpline which provided a facility for staff, members and volunteers to call for independent advice on a range of subjects, including financial and legal advice as well as mental health support. The MO said that not all authorities provided this type of support and asked the SGO to send him details of the welfare helpline to include in the consultation response.

Question 18 – The MO read out an email sent by a Member which accompanied their apology for the meeting: "I think the powers to suspend or remove remain inadequate. Given the recent history of the BA, the ability of a member to disrupt the business of the Authority with impunity on a continuing basis is a real problem and is not dealt with by the proposed changes. A member who had been profoundly disruptive was removed after a long process and then returned as a nominated member from one of our local authorities. That should not be possible." The MO said that his view was that the Authority might not use suspension very often, however, the ability to suspend gave credibility to the overall process. A Member commented that there was a need to have the ability to remove a member as well as suspend.

It was agreed that the MO would add this to the comment section at question 19.

Question 19 – A Member asked for clarification on the power to suspend a member and whether that should be through a Standards Committee recommendation to the Broads Authority for them to make the final decision. The CE confirmed that this was how it had happened previously. The MO said that his view was that a Hearings Sub-Committee of the Standards Committee would make the decision and the outcome would be reported to the Broads Authority. A Member commented that the Standards Committee should have delegated powers to make that decision and that the IP should be there to assure that the process had been carried out correctly and not to veto the decision.

The MO said that, in relation to the second point in the Member's email regarding the reappointment of a suspended member through another path, sanctions would apply and the subject member would not be able to appear as a different type of member. A Member commented that if a member was suspended, there should not be a means for that person to be reappointed via any other path. The MO confirmed that he would add to the comment section of question 19, that if the member was suspended by the Broads Authority, it should not be possible to be reappointed by another appointing body.

It was agreed that the MO would amend the comments to reflect the Committee's views.

Question 21 – A Member commented that there should be a range of sanctions – 6 months might not be long enough for some particular cases. The MO said that there was also the opportunity to disqualify a member. A Member commented that a suspension also protected

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any witnesses or complainant, therefore, depending on how long an investigation took, 6 months might not be long enough to cover a full investigation.

It was agreed that the answer to question 21 should be amended to 'No – I do not think the government should set a maximum length of suspension'.

Question 25 – A Member commented that it would be possible for a suspended member to attend a committee meeting as a member of the public and that there would need to be safeguards put in place to prevent any potential bullying. The MO confirmed that as a suspended member, they would have no contact with staff or members of the authority. The MO said that he would flag up this issue within the comment section where a suspended member would be able to continue bullying via other means, such as social media or attending meetings as a member of the public.

Question 28 – A Member asked whether the MO could add in the text box a requirement for the process to be completed as quickly as possible. The MO confirmed that he would add that to the comment box.

A Member asked how much teeth did a Code of Conduct have and could a member make a legal challenge claiming that it was against their rights. The MO said that there had been judicial review challenges which had almost all been on Article 10 of the European Convention on Human Rights - the right to freedom of expression. A member could criticise policies and performance but not abuse the person.

Question 31 – The MO said that this question was about 'repeat offenders'. If someone was suspended twice, should this trigger an automatic disqualification. However, there were questions to be answered in relation to how this would work for disqualification of a member of a National Park and the appointing body. A Member commented that he thought that there should be the option of disqualification, however, it should be about the seriousness of the offence not the number of times an offence had been committed, i.e. was the sanction of disqualification appropriate in a particular case.

Members agreed that the MO should add the wording that as long as a fair process and hearing has been conducted then immediate disqualification should be an option.

Question 37 – A Member asked whether appeal body would be limited to the most serious of offences, i.e. disqualification only. The MO confirmed that it would.

Question 40 – A Member commented that this would benefit those with protected characteristics as it would lead to higher standards of conduct.

Members agreed that the answer should be changed to 'It would benefit individuals with protected characteristics'.

Andrée Gee proposed, seconded by Tim Jickells.

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It was resolved unanimously to approve the Authority's formal response to the consultation for submission to the MHCLG, subject to the MO compiling responses in accordance with the views expressed in the meeting.¹

The meeting adjourned at 11:30am and reconvened at 11:34am.

9. Code of Conduct for Members – review

Members received the report of the Monitoring Officer (MO). The MO said that he and the Senior Governance Officer (SGO) had carried out a review of the Code of Conduct for Members. The review was to tidy up the interests section and the MO confirmed that there were no substantive changes to the behavioural elements of the Code. He explained that there were three changes proposed to Appendix B of the code which dealt with interests.

1. The code adopted by the Authority in 2021 was taken almost word for word from the LGA model code but it omitted the paragraph numbering from that model in Appendix B. That made the Authority's code harder to follow and in one place, potentially confusing as it referred to a paragraph number which was not there. The proposed change inserted the paragraph numbering from the LGA code. This would make Appendix B easier to follow and consistent with other Norfolk local authorities' codes which would assist council-appointed members of the Authority.
2. What would become paragraph 8 of Appendix B (page 38 of the papers) of the current code sets out circumstances in which a member must not only declare a Non Registrable Interest (NRI) but must also not speak or vote on the item. Those circumstances were that the NRI affected the financial interests or wellbeing of the member, a relative or close associate or a range of bodies set out in Table 2 (on page 42 of the papers):
 - a) To a greater extent than it affects the financial interests of the majority of the inhabitants of the ward affected by the decision; and
 - b) A reasonable member of the public knowing all the facts would believe that it would affect the member's view of the wider public interest.

An example might be that a member was an unpaid director of a sailing club who sat on the Planning Committee. If the sailing club applied for planning permission to extend the clubhouse, that decision would affect the financial position or wellbeing of the sailing club and was therefore an NRI which the member must declare. It was also an NRI which affected the financial interests of the sailing club more than the majority of inhabitants of the area. Currently "area" was defined as the ward affected by the decision, however, the Authority did not have wards, and this was potentially

¹ The MO circulated the amended response to the consultation to Members of the Standards Committee on Monday, 24 February 2025.

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confusing. Other National Park authorities defined the area as that of the National Park. It was proposed that the area was that of the Broads Authority.

The result would be that a member would have to leave the room if their NRI affected the financial interests of themselves, a relative or close associate or a Table 2 body more than inhabitants of the Authority's area as a whole. The change was not expected to lead to markedly different outcomes but would resolve a technical drafting point.

3. The current version of the Authority's code sets out, at the bottom of page 38 of the papers, that as long as the member had declared the interest, they may nonetheless attend, speak and vote. These were the setting of tolls where the member owned a boat, matters relating to schools where the member was a parent, guardian or governor of a child at a different school in the area, and an allowance, payment or indemnity given to members. There was also a note saying that some other subject matters might apply in local government but were unlikely to apply to the Authority.

It was, therefore, proposed to remove the reference to schools and the note about other subject matters as being irrelevant. The MO said that it was difficult to think of a case where the Authority was taking a decision which related to schools such that a member had an interest in the first place.

The MO confirmed that, in relation to the discussion on tolls at the Navigation Committee, there was a 'baked-in' dispensation for all boat owners to take part in that particular item and vote, which included commercial boat owners. However, when tolls were discussed at the Broads Authority meeting, private boat owners would have a dispensation but hire boat operators would need to leave the meeting for that particular item.

There was a discussion about what constituted private and commercial interests and individual grants of dispensation. The MO said that he had the ability to grant a dispensation to hire boat operators to enable them to 'participate and vote at the Navigation Committee meeting on all matters where the member would otherwise have a pecuniary interest through their employment or business, subject to a requirement to declare such interests as and when arises'. The public interest rationale for this was that the Navigation Committee was designed statutorily to be a consultative body which captures those with interests. The MO proposed that the dispensation that was given to the hire boat operators was 'baked-in' for all members of the Navigation Committee for Navigation Committee business. The Chief Executive (CE) said that the dispensation should only be for the setting of the tolls at the Navigation Committee meeting, as, for example, if a member of the committee was present when a planning application that affected their business was discussed, they would need to leave the room. The MO confirmed that this dispensation would be limited to tolls only.

A Member asked for clarification that if the Chair of the Navigation Committee, who was a member of the Broads Authority was not allowed to take part during the setting of tolls item, how would members of the Broads Authority be able to ask questions of what was discussed at the Navigation Committee. The SGO confirmed that there were five members of the Broads

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Authority who were appointed to the Navigation Committee, so they would be available to answer any questions.

Members discussed individual circumstances around setting tolls, and who should be granted dispensation. The MO confirmed that members of the Broads Authority would have to apply for dispensation on a case by case basis. The MO proposed that he and the SGO would look at the wording for section 9 of the Code of Conduct in relation to the grant of dispensation in relation to tolls setting. He suggested the wording be “to participate and vote at Navigation Committee meetings on matters relating to Navigation tolls setting where the member would otherwise have pecuniary interests with their employment or business, subject to a requirement to declare such interest as and when it arises.”

Paul Hayden proposed, seconded by Tim Jickells.

It was resolved unanimously to recommend the Broads Authority adopts the revised Code of Conduct for Members, subject to the Monitoring Officer being instructed to, in consultation with the Chair of the Standards Committee, amend the wording to paragraph 9 of the Code of Conduct to include ‘private’ in relation to the setting of tolls; and to provide the ability for the members of the Navigation Committee, irrespective of their commercial interests, to participate in meetings on matters relating to navigation toll setting.

The Chair thanked the MO for two clear presentations on what were both very tricky subjects.

10. Other items of business

There were no other items of business.

A Member commented that the meeting was very close to not being quorate. The Senior Governance Officer said that the Governance team could send an email to remind members.

11. Date of next meeting

The next meeting of the Committee would be held on Thursday 12 March 2026 at 10.00am at Yare House, 62-64 Thorpe Road, Norwich NR1 1RY. Further meetings would be called as and when needed.

The meeting ended at 12:04pm

Signed by

Chairman

Standards Committee

19 March 2026

Agenda item number 8

Proposed amendment to Member Code of Conduct - interests of Navigation Committee members

Report by Monitoring Officer

Purpose

To consider amendments to the member Code of Conduct relating to declarations of interests and dispensations for members of the Navigation Committee.

Recommendation

To recommend to the Authority that the Member Code of Conduct be amended by the addition of the words “For members of the Navigation Committee only, consultation on navigation matters other than the level of navigation tolls, irrespective of the nature and extent of the interest” to paragraph 9 of Appendix B of the Code.

1. Introduction

- 1.1. The Broads Authority is a Relevant Authority under section 27 of the Localism Act 2011. As such, it must adopt a code of conduct reflecting the Nolan principles governing the conduct of its members and setting out rules relating to the declaration of interests and the participation in decision making of those with such interests.
- 1.2. The Authority’s current code is taken from a national model code provided by the Local Government Association (LGA), though the Authority may and has departed from the LGA Model Code to suit its own particular circumstances.
- 1.3. One of those particular circumstances is that under sections 9 of the Norfolk and Suffolk Boards Act 1988, the Authority must establish a Navigation Committee of 13 members of whom 5 are members of the Authority and 8 are not. Those 8 persons are appointed by the Authority after consultation with bodies appearing to the Authority to represent a range of uses and interests in relation to the navigation waters of the Broads.

- 1.4. The Authority must consult the Navigation Committee before determining the level of navigation tolls or charges and on the preparation of the annual budget, including in particular any income or expenditure attributable to the navigation area.
- 1.5. The Authority also consults the Navigation Committee on a range of other issues relating to navigation such as boat safety codes, vessel licensing requirements, weed cutting and applications for planning permission for developments likely to affect navigation. In so doing, the Navigation Committee is acting in a consultative capacity rather than deciding an issue itself.
- 1.6. Given that the purpose of the Navigation Committee is to enable the Authority to consult persons with particular interests in navigation, it is appropriate to facilitate the participation of Committee members in providing advice to the Authority whilst ensuring transparency as to the interests held by those persons.
- 1.7. This report proposes a change to the Member Code of Conduct to achieve the above.

2. Current member interest requirements

- 2.1. Paragraph 9 of the Code of Conduct requires that members (including appointed members of the Navigation Committee) register and disclose interests. Table 1 sets out disclosable pecuniary interests (DPIs) which must by law be registered and disclosed. Appendix B sets detailed provisions on registering and disclosing interests. Interests fall into the following categories:-

Interest type	Summary of interest	Requirement
DPI	Table 1 interests – includes member and member’s partner’s employment or property ownership	Must be declared. Cannot speak or vote or remain in the room without a dispensation.
Other Registrable Interest (ORIs)	Table 2 - Unpaid directorships, bodies to which the member is appointed by the Authority, positions of control or management in other public, charitable or lobbying organisations.	Must disclose if matter directly relates to financial interest or wellbeing of ORI. Can remain and speak only if public can do so. Otherwise, cannot speak or vote or remain in the room without a dispensation.
Non Registrable Interest (NRI) -para 6	Matter directly relates to members’ financial interest or wellbeing or that of a relative or close associate	Must disclose. Can remain and speak only if public can do so. Otherwise, cannot speak or vote or remain in the room without a dispensation

Interest type	Summary of interest	Requirement
NRI – para 7	Matter affects own financial interest or wellbeing, relative, close associate or ORI body	Must disclose. Can remain and speak.
NRI – para 8	Matter affects own financial interest or wellbeing, relative, close associate or ORI body:- (a) to greater extent than affects financial interests of majority of inhabitants of BA area, and (b) reasonable member of public knowing all facts would believe that would affect view of wider public interest	Must disclose. Can remain and speak only if public can do so. Otherwise, cannot speak or vote or remain in the room without a dispensation

- 2.2. Paragraph 9 of Appendix B of the Code provides a permanent dispensation for Navigation Committee members to enable them to declare, speak and vote on consultation on the level of navigation tolls where the extent of their interest is limited to (a) a liability to pay a navigation toll or (b) the holding of any employment, office, trade, profession or vocation carried on for profit or gain in an entity liable to pay a navigation toll.
- 2.3. The purpose of the above is to enable Navigation Committee members who either pay a navigation toll themselves or own, run or manage a hire boat operator to nonetheless speak and vote on toll setting consultation.
- 2.4. Some Navigation Committee members have applied and been granted dispensations by the Monitoring Officer to participate in consultations on wider navigation matters, such as on pilotage or weed cutting.
- 2.5. It is proposed to avoid the need for requests for such specific dispensations in the future by extending the scope of paragraph 9 of Appendix B of the Code to consultation on any navigation matter, as follows (additional wording in bold):-

“For the following interests, once you have made a declaration you may nonetheless attend a meeting and vote:

- *Setting of navigation tolls, where the extent of the interest is limited to a liability to pay a navigation toll by reason of owning one or more private vessels.*
- *For members of the Navigation Committee only, consultation on the level of navigation tolls where the extent of the interest is limited to:*
 - a. a liability to pay a navigation toll or*
 - b. the holding of any employment, office, profession or vocation carried on for profit or gain in an entity liable to pay a navigation toll*
- ***For members of the Navigation Committee only, consultation on navigation matters other than the level of navigation tolls, irrespective of the nature and extent of the interest.***
- *An allowance, payment or indemnity given to members”.*

3. Financial implications

- 3.1. There are no specific financial implications.

4. Risk implications

- 4.1. There are no specific risk implications.

5. Conclusion

- 5.1. The report sets out an additional dispensation widening the ability of members of the Navigation Committee to contribute to consultations on navigation matters, notwithstanding interests they may hold.

Author: Jonathan Goolden

Date of report: 25 February 2026

Appendix 1 – [Member Code of Conduct](#)

Standards Committee

19 March 2026

Agenda item number 9

Creating a framework for Member engagement with operational staff

Report by Head of Governance

Purpose

To propose a draft framework for managing requests from Members to accompany officers during their operational duties, ensuring these interactions are positive, productive and safeguard the respective roles of Members and staff.

Recommendation

Recommend to the Broads Authority that the Volunteer Strategy is updated to provide guidance on Member volunteering and engagement as proposed in the report.

1. Introduction

- 1.1. At its 19 September 2025 meeting, the Broads Authority considered a paper proposing an update to the Code of Conduct that would clarify the position on Member volunteering. The Authority acknowledged the importance of the issue but did not reach a consensus, referring the matter to this Committee for detailed review.
- 1.2. This paper does not seek to limit Member participation. Instead, it acknowledges the valuable feedback from Members and incorporates critical operational perspectives from staff gathered following the meeting. The aim is to move towards a practical framework that balances Members' desire to learn and contribute with the need for clear boundaries and effective service delivery.
- 1.3. We propose shifting from a Code of Conduct focus to creating a clear Member engagement and volunteering approach for the Volunteer Strategy. This would provide clarity for both Members and staff, ensuring all interactions are constructive and governed by mutual respect.

2. Background and feedback

- 2.1. The original paper highlighted potential governance concerns, including conflicts of interest and the blurring of member-officer roles. The Authority's discussion revealed a strong desire from Members to maintain opportunities for hands-on engagement to better inform their strategic duties.

2.2. Feedback from Members emphasised that:

- The Authority benefits from the expertise and external perspectives of its Members.
- Engagement with operational staff is seen as vital for understanding the Broads.
- A case-by-case approach was preferable to a universal ban.

2.3. Feedback from Staff, gathered to better understand operational realities, highlighted several challenges with the current informal approach:

- Staff can feel obliged to accommodate Member requests at times convenient to the Member, rather than times that fit operational workflows.
- Officers sometimes must alter their planned physical work (e.g. tree trimming) to accommodate a Member who may not be able to participate fully, impacting productivity.
- There is a distinction between a Member wishing to volunteer to complete a specific task, and a Member wishing to observe and learn about operations. The former requires a focus on the work, while the latter is an educational engagement.
- Staff can be placed in difficult situations if asked about broader Authority policy or positions on which they are not briefed, leading to potential miscommunication.

3. Proposed Framework for a Member Engagement

3.1. To address these points, the following framework is proposed for inclusion in our Volunteer Strategy. It is designed to foster positive interactions while providing clear guidelines.

3.2. **Guiding Principles**

3.3. Every interaction must have a clear purpose:

- (a) either as a formal volunteering activity, or
- (b) an observational engagement.

3.4. The distinct roles of Members (strategic) and Officers (operations) must always be respected as outlined in the Code of Conduct.

3.5. The work schedule and safety requirements of officers are the primary consideration.

3.6. Engagement opportunities will be offered around existing work plans.

3.7. All queries regarding Authority policy or position on matters should be directed to a member of the Management Team , protecting staff from being put in a difficult position.

3.8. **Proposed Protocol for Member Engagement**

A. Formal volunteering on specific tasks

For Members who wish to actively volunteer to complete specific physical or administrative tasks alongside officers, the following would apply:

- *Opportunities are Officer-Led*

Volunteering opportunities, including dates and times, will be prescribed by officers based on operational need and capacity.

- *Commitment to the Task*

Members are expected to participate fully in the volunteer activity for its duration. If a Member is unable to participate in the core tasks of the day, they should not request to volunteer for that specific activity.

- *Clear Briefing*

Members' volunteering will receive a clear briefing on the tasks, safety procedures, and the chain of command for the day.

B. Observational Engagement and Learning

To better support Members' needs to understand operations without the pressure of task completion, a separate pathway is recommended:

- *Official Tours and Shadowing*

Members wishing to learn about the operations of the Broads should request an official, structured tour or shadowing opportunity. This is distinct from volunteering and is designed specifically for education and observation.

- *Scheduled and Structured*

These engagements will be scheduled separately from critical task-based work and will be designed to maximise learning without disrupting workflow.

3.9. Any concerns regarding the application of this framework or potential conflicts of interest shall be referred to the Monitoring Officer for direction.

4. Communication and follow-up

4.1. To address concerns about misquotation and unclear messaging, the strategy will include:

- A reminder that staff speak in an operational capacity, and any questions of a strategic or policy nature should be directed to the relevant Director.
- Encouragement for Members to confirm any operational insights or policy questions with the relevant Director

5. Next Steps

5.1. The Standards Committee is asked to:

- Consider the operational feedback and Member sentiments outlined in this paper.
- Provide guidance on the principles and proposed protocol of Members to be added to the Volunteer Strategy.
- Recommend this matter back to the Broads Authority for formal approval.

6. Conclusion

- 6.1. The previous approach, to limit member participation, was clear but it ignored the legitimate desire of Members to engage. The completely informal approach was popular with some Members but creates unacceptable pressures on staff and governance risks for the Authority.
- 6.2. The proposed framework is a pragmatic and constructive approach. It acknowledges the complexity of the issue and provides a structured, fair and transparent way to achieve the engagement Members want, while providing the clarity and protection that staff need.

Author: Rob Thomas

Date of report: 12 November 2025

Background papers: [Broads Authority Meeting 19 September 2025, Code of Conduct Update on Member Volunteering](#) –

Standards Committee

19 March 2026

Agenda item number 10

Update on the consultation on strengthening the standards and conduct framework for local authorities in England

Report by Head of Governance and Monitoring Officer

Purpose

To provide an update on the consultation on strengthening standards and conduct framework for local authorities in England, undertaken by the Ministry of Housing, Communities and Local Government in 2025.

Recommendation

To note the Government's proposals for strengthening the standards and conduct framework for local authorities.

1. Introduction

- 1.1. The Localism Act 2011 requires the Broads Authority and a range of other types of local authorities (referred to as "Relevant Authorities" in the 2011 Act) to promote and maintain high standards of conduct by members and co-opted members.
- 1.2. The current regime requires every local authority (including the Broads Authority) to adopt a Code of Conduct, the contents of which must as a minimum be consistent with the seven 'Nolan' principles of standards in public life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership), and set out rules on requiring members to register and disclose pecuniary and non-pecuniary interests. Beyond these requirements, it is for individual authorities to set their own local code. The Local Government Association (LGA) published an updated model Code of Conduct and guidance in 2021, which the Broads Authority has adopted with appropriate minor amendments.
- 1.3. Every authority must also have in place arrangements under which it can investigate allegations of breaches of its Code of Conduct and must consult at least one independent person before coming to decisions. These decisions are normally taken in one of two ways depending on an authority's specific arrangements. The decision can

be made by the full authority following advice from their Standards Committee (or equivalent). Alternatively, the decision can be made by the Standards Committee if they have been given the power to do so. Although a Standards Committee may contain unelected independent members and co-opted members, only members of the authority may vote in a decision-making Standards Committee.

- 1.4. The Broads Authority operates a Standards Committee and any decisions on allegations are taken by the Committee, which at present is composed only of members of the Authority.
- 1.5. Prior to the consultation, the Government considered that the current local authority standards and conduct regime is in certain key aspects ineffectual, inconsistently applied, and lacking in adequate powers to effectively sanction members found in serious breach of their Codes of Conduct. Currently, there is no provision in legislation for a sanction to suspend a member found to have breached the Code of Conduct.

2. The consultation

- 2.1. The ‘Strengthening the Standards and Conduct Framework for Local Authorities in England’ consultation sought views on a whole system reform of the standards and conduct framework for local government. The proposed reforms consulted on reflected the government’s ambition to introduce a clearer and consistently applied standards and conduct framework for local government in England.
- 2.2. The reforms aim to ensure misconduct is dealt with swiftly and fairly across the country in every type and tier of local government, and that local government is empowered, fully accountable and deserving of people’s trust and confidence.
- 2.3. The consultation sought views from members of the public, current and prospective local authority elected members, local government officers from all types and tiers of authorities, and local authority sector representative organisations.
- 2.4. The Standards Committee was consulted on the [Authority's formal response to the consultation](#) for submission to the Ministry of Housing, Communities and Local Government (MHCLG) on 20 February 2025.

3. Government response

- 3.1. On 11 November 2025, the MHCLG published the [Consultation results and government response](#).
- 3.2. The proposals and 40 consultation questions were arranged under 2 principal headings: Strengthening the Standards and Conduct framework; and introducing the power of suspension with related safeguards.
- 3.3. 2,092 responses to the consultation were received, and results showed that there was widespread appetite for system reform.

3.4. MHCLG have set out their intent to legislate for a whole system reform of the current regime as set out in the Localism Act 2011, which established the current standards and conduct and framework for all local authorities, and have recommended the following measures:

- The introduction of a mandatory code of conduct, which will include a behavioural code, for all local authority types and tiers
- Requirement that all principal authorities convene formal standards committees, to include provisions on the constitution of standards committees to ensure objectivity, accountability and transparency
- Requirement that all principal authorities offer individual support during any investigation into code of conduct allegations to both the complainant and the councillor/member subject to the allegation
- Introduction at the authority level of a 'right for review' for both complainant and the subject elected member to have the case reassessed on grounds that will be set out in legislation
- Powers for authorities to suspend members for a maximum of 6 months for serious code of conduct breaches, with the option to withhold allowances during suspension for the most serious breaches and introduce premises and facilities bans either in addition or as standalone sanctions
- In response to the most serious allegations involving police investigation, or where sentencing is pending, the introduction of powers to suspend members on an interim basis for an initial period of 3 months which, if extended, will require regular review
- A new disqualification criterion for any member subject to the maximum period of suspension more than once within 5 years
- The creation of a new national appeals function, to consider appeals from members to decisions to suspend them and/or withhold allowances, and for complainants if they consider their complaint was mishandled. Any appeal submitted will only be permitted after complainant or elected has invoked their 'right for review' of the local standards committee decision has been invoked and that process is completed.

4. Public Office (Accountability) Bill (“the Hillsborough Law”)

4.1. Alongside the Government’s proposals for strengthening the current standards framework, members should note the passage through Parliament of the Public Office (Accountability) Bill, popularly known as the Hillsborough Law.

- 4.2. Though entirely separate from the standards proposals, the Hillsborough Law bill contains some significant related obligations on public bodies, including the Broads Authority, its members and officers.
- 4.3. The Bill imposes a duty of candour on local authorities who will be required to provide information with complete honesty during investigations, inquiries and inquests, including non-statutory inquiries. Local authorities will be required proactively to provide complete disclosure of information as soon as reasonably practicable, even when that information may be unfavourable.
- 4.4. The Bill also imposes a professional duty of candour on public officials. A public official will include the chief executive and staff and possibly an appointed member of the Broads Authority but as currently drafted does not include a local government councillor unless a member of the executive of the authority. The Broads Authority does not have an executive model of governance.
- 4.5. It will be an offence to:-
 - a) fail to comply with the duty of candour and to intentionally or recklessly mislead the public where to do so would be seriously improper.
 - b) use a public office to obtain a benefit if to do would be seriously improper.
 - c) breach a duty to prevent death or serious injury
- 4.6. These offences are intended to replace the current common law offence of misconduct in public office.
- 4.7. Under clause 9 of the Bill, a public authority must promote and take steps to maintain high standards of ethical conduct at all times by people who work for the authority. The public authority must adopt a code of conduct, take steps to make sure that those people are aware of it and the consequences for failing to act in accordance with it. The code must, amongst other things, set out whistleblowing and complaint procedures.
- 4.8. Should the Bill be enacted in its current form, it will be necessary to assess against expected Government guidance whether there will need to be changes to:-
 - d) the member code of conduct
 - e) officer code of conduct
 - f) whistleblowing policy
 - g) health and safety reporting policy
 - h) critical incident recording (such as a fatality involving a member or staff or user of a vessel licensed by the Authority)

5. Conclusion

- 5.1. The proposed changes for strengthening the standards and conduct framework should be welcomed, especially in regard to a mandatory code of conduct and improved sanctions. However, it should be noted, that the Broads Authority already has in place several of the recommendations. This includes the setting up of a Standards Committee; and the provision of individual support for both complainants and members who are subject to any allegation, is set out in the [Whistleblowing Policy for Members](#) and [Whistleblowing Policy](#) for Officers.
- 5.2. Further scrutiny and assessment of the Public Office (Accountability) Bill will be needed when Government guidance is issued.

Author: Lorraine Taylor and Jonathan Goolden

Date of report: 25 February 2026