

Meeting: Standards Committee

Date: 31 May 2005

REVIEW OF THE CODE OF CONDUCT FOR MEMBERS

(Legal)

Author – Paul Froggatt Ext.No. 2212

1 PURPOSE

To settle Stevenage Borough Council's response to the Consultation Paper issued by the Standards Board for England on the review of the Code of Conduct for Members.

2 RECOMMENDATIONS

That the Council responds to the Consultation Paper in the terms set out in Appendix C.

3 BACKGROUND

- 3.1 Part III of the Local Government Act 2000 requires all local authorities to adopt a Code of Conduct for Members.
- 3.2 Although the legislation envisaged that local authorities would have some discretion over the details of the Code the Government issued a mandatory code to which local authorities could add if they so wish (although they were not encouraged to do so).
- 3.3 The Council adopted its current Code for Members in 2002 (attached at Appendix A), which, save as to a very minor addition, is identical to the statutory code. The 2000 Act also introduced, through a statutory instrument, some general principle of conduct; these are set out in Appendix B. It is possible that these were originally intended to inform individual Council local codes, assuming they had been given discretion to formulate these but as it is, to date these principles have had very little significance.
- 3.4 The Code of Conduct (and the operation of the Standards Board for England) has been the subject of some criticism, in particular issues over the registration of interests, the line between public and private conduct and personal and prejudicial interests. As a result the Standards Board for England, at the request of the Minister, is conducting a review of the Code of Conduct (though not the operation of the Standards Board for England).
- 3.5 The aim of the consultation is to review the effectiveness of the Code and "explore ways in which it could be simplified, clarified and improved". It should however "reflect contemporary views on ethics" and be "alive and responsive to societal and Local Government community views on members' conduct and ethical trends". Its own survey shows that the general public has "high expectations of its elected and appointed representatives".

3.6 As it is now becoming standard practice in consultation exercises, the Standards Board Paper is designed to confine the responses by asking specific questions: These are addressed in the sequence they appear in the Paper.

3.7 **The general principles**

1. *Should the ten general principles be incorporated as a preamble to the Code of Conduct?*
2. *Are there any other principles, which should be included in the Code of Conduct?*

3.8 The general principles correctly describe themselves, they are principles and they are defined in general terms. They are not a series of enforceable rules as the Code is intended to be. However, they may assist in interpretation as a preamble to the Code. They also appear to be comprehensive and no other additions are immediately obvious.

3.9 **Behavioural issues**

3. *Is it appropriate to have a broad test for disrespect or should there be a more defined statement?*

3.10 The Consultation Paper notes that such a change would make the Code more inflexible. The Standards Board has, it seems, tried to discourage the use of this provision in personal disputes. It is also likely that minor allegations of this nature will be referred back to committees and monitoring officers to determine, in which case Councils will have some discretion in these matters.

4. *Should the Code of Conduct include a specific provision on bullying? If so should the definition of bullying adopted by the Code of Conduct reflect the ACAS definition of bullying? This reads as follows:*

"bullying may be characterised as a pattern of offensive, intimidating, malicious, insulting or humiliating behaviour; an abuse or misuse of power or authority which attempts to undermine an individual or a group of individuals, gradually eroding their confidence and capability, which may cause them to suffer stress..."

3.11 The Council has adopted (as is required under the Local Government Act 2000) a member/officer protocol, which touches on bullying, at least between members and officers. The Consultation Paper also notes that "the Code already proscribes bullying, in effect, through existing requirements". The conclusion is, therefore, that no specific provision is required but the ACAS Code could be adopted as guidance in dealing with allegations of bullying.

3.12 **Confidential information**

5. *Should the Code of Conduct contain an explicit public interest defence for members who believe that they have acted in the public interest by disclosing confidential information?*

No, but this should be taken into account by the Standards Board, or as appropriate, the Council's Standards Committee in dealing with breaches of this provision and it must be assumed that both those bodies will deal with matters in a proportionate and reasonable way in all the circumstances.

6. *Do you think that the Code of Conduct should cover only information which is in law exempt or "confidential" to make it clear that it would not be a breach to disclose any information that an authority had withheld unlawfully.*

Although this may be revised shortly, as it stands the law which permits local government to deny public access to certain reports or background papers by designating them as exempt (Part II) is slightly out of step with the general rights of access to publicly held information under the Freedom of Information Act. As a result councils may determine that certain reports or pieces of information are withheld from the public although these might be discloseable following a request under the Freedom of Information Act. It would not be appropriate for Members to be criticised for disclosing information which the council could not lawfully withhold following a public request.

3.13 3.14 **Disrepute and private conduct**

7. *Should the provision relating to disrepute be limited to activities undertaken in a member's official capacity, or should it continue to apply to certain activities in a member's private life*
8. *If the latter should continue to be a broad provision, would you restrict it solely to criminal convictions and situations where criminal conduct had been acknowledged?*

3.15 This has been a troublesome area for the Standards Board of England. Elected and appointed members act in a largely voluntary capacity and, generally, private behaviour may be a matter on which the electorate, the press or political parties may have a view, but should not be a legitimate concern for the Authority or the Standards Board. However, it is widely felt that the Code should make some reference to private behaviour and it also appears to be the case that the Standards Board has been careful and even reluctant in becoming involved in these types of allegations. It is, therefore, considered that the Code should remain unaltered in both respects.

3.16 **Misuse of resources**

9. *Should the Code prohibit breaches of the publicity code, breaches of any local protocol, misuse of resources, inappropriate political purposes?*
10. *If so how could inappropriate political purposes be defined?*
11. *Do you agree that the Code should not distinguish between physical and electronic resources?*

3.17 The general view is that the Code should explicitly refer to such breaches. This area is substantially covered in the case of breaches by local authorities under the Local Government Act 1986 and, in some circumstances, election law.

3.18 The definition of inappropriate political purposes could be dealt with by local or national guidance. The Standards Board is considering issuing a model protocol for the use and, presumably, misuse of resources.

3.19 Given the wide use of electronic resources, it is difficult to see why these should be distinguished from physical resources.

3.20 **A duty to report breaches**

*12/ Should the provision of the Code be retained in full, removed altogether
13. or somehow narrowed? If it should be narrowed how will this be defined?*

14. Should there be a further provision about making false, malicious or politically motivated allegations?

15. Does the Code need to provide effective protection for complaints against intimidation, or is this already adequately covered?

3.21 However strong the objective arguments in favour of this provision, in practice it potentially presents members with serious difficulties as currently drafted. If the clause is to remain, it should be narrowed and the obligation should only arise in clear and serious cases of breach. There should be no specific provision for false, malicious or politically motivated allegations. As is pointed out in the Consultation Paper, this would not serve as a deterrent to non-members (who are not bound by the Code) and it also might dissuade some members from making allegations which should properly be reported. In serious cases such allegations by members might well be judged as breaches of other parts of the Code and no further protection is considered necessary.

3.22 **Personal interests**

16. Does the term "friend" require further definition in the Code?

3.23 The general view is that no further definition is required as the Standards Board guidance on 'friend' is working adequately and provides some reliable and authoritative assistance in cases of doubt.

17. Should the personal interest tests be narrowed so that members do not have to declare interest shared by a substantial number of other inhabitants in the authority's area?

3.24 On balance, this would be an improvement though the term "substantial" could give rise to uncertainty and perhaps should be qualified. "Substantial proportion" for instance might provide greater clarity.

18. Should a new category of public service interests be created relating to service on other public bodies subject to different rules of conduct?

3.25 Yes, provided that public service interests are clearly defined and restricted

19. If so, do you think public service interests, which are not prejudicial and which appear in the public register of interests, should have to be declared at meetings?

3.26 The emphatic view of this Council is that they should not. Possibly a list of interests being available at any meeting would be an acceptable compromise.

20. Do you think that paragraphs 10(2)(a-c), which provide limited exemptions from prejudicial interests for some members in certain circumstances, should be removed from the Code of Conduct?

3.27 Yes. The Code in this respect has caused considerable confusion and if there were some relaxations in response to questions 21 or 23 below these exemptions might have less relevance.

21. Do you think less stringent rules should apply to prejudicial interests, which arise through public service and membership of charities and lobbying groups?

3.28 Members may find themselves with very real conflicts of interests where they are members of such bodies, particularly lobbying groups, and the current restrictions should remain. However, they should be allowed to address meetings - see question 23.

22. Should members with a prejudicial interest in a matter under discussion, be allowed to address the meeting before withdrawing?

3.29 No, however, as the Paper notes there are other ways in which members under a disability can represent their constituents' views and it should be permissible for another member without that prejudicial interest to put these to the meeting.

23. Do you think the members with prejudicial public service interests should be allowed to contribute to the debate before withdrawing from the vote?

3.30 They should be allowed to address the meeting

3.31 **Registration of interests**

24. Should members employed in areas of sensitive employment, such as the security services, need to declare their occupation in the public register of interests?

3.32 No, but these interests should be disclosed to the Monitoring Officer as suggested in the Consultation Paper. Very few members are likely to be affected by this issue.

25. Should members be required to register membership of private clubs and organisations? And if so, should it be limited to organisations within or near an authority's area?

3.33 Yes although the area limitation should not apply if the club or organisation has significant influence within the authority's area.

26. Should the Code of Conduct require that the register of gifts and hospitality be made publicly available?

3.34 Yes.

27. Should members also need to declare offers of gifts and hospitality that are declined?

3.35 Yes if they exceed the threshold in point 29 below.

28. Should members need to declare a series of gifts from the same source, even if these gifts do not individually meet the threshold for declaration? How could we define this?

3.36 Yes.

29. Is £25 is an appropriate threshold for the declaration of gifts and hospitality?

3.37 No, should be increased. £40 is a reasonable balance.

4 IMPLICATIONS

None specific

BACKGROUND DOCUMENTS

- A Code for the future – A consultation paper on the review of the Code of Conduct for members – Standards Board for England

APPENDIX A

STEVENAGE BOROUGH COUNCIL CODE OF CONDUCT

PART 1

GENERAL PROVISIONS

1. (1) A member must observe the authority's code of conduct whenever he -

- (a) conducts the business of the authority;
- (b) conducts the business of the office to which he has been elected or appointed; or
- (c) acts as a representative of the authority,

and references to a member's official capacity shall be construed accordingly.

(2) An authority's code of conduct shall not, apart from paragraphs 4 and 5 (a) below, have effect in relation to the activities of a member undertaken other than in an official capacity.

(3) Where a member acts as a representative of the authority -

- (a) on another relevant authority, he must, when acting for that other authority, comply with that other authority's code of conduct; or
- (b) on any other body, he must, when acting for that other body, comply with the authority's code of conduct, except and insofar as it conflicts with any other lawful obligations to which that other

body may be subject.

- (4) In this code, "member" includes a co-opted member of an authority.

General Obligations

2. A member must
- (a) promote equality by not discriminating unlawfully against any person;
 - (b) treat others with respect; and
 - (c) not do anything which compromises or which is likely to compromise the impartiality of those who work for, or on behalf of, the authority.
3. A member must not
- (a) disclose information given to him in confidence by anyone, or information acquired which he believes is of a confidential nature, without the consent of a person authorised to give it, or unless he is required by law to do so; nor
 - (b) prevent another person from gaining access to information to which that person is entitled by law.
4. A member must not in his official capacity, or any other circumstance, conduct himself in a manner which could reasonably be regarded as bringing his office or authority into disrepute.
5. A member -
- (a) must not in his official capacity, or any other circumstance, use his position as a member improperly to confer on or secure for himself or any other person, an advantage or disadvantage; and
 - (b) must, when using or authorising the use by others of the resources of the authority
 - (i) act in accordance with the authority's requirements; and
 - (ii) *ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the authority or of the office to which the member has been elected or appointed.*
6. (1) A member must when reaching decisions –
- (a) have regard to any relevant advice provided to him by -
 - (i) *the authority's chief finance officer acting in pursuance of his duties under section 114 of the Local Government Finance Act 1988; and*

- (ii) *the authority's monitoring officer acting in pursuance of his duties under section 5(2) of the Local Government and Housing Act 1989; and*
- (b) *give the reasons for those decisions in accordance with the authority's and any statutory requirements in relation to the taking of an executive decision.*
- (2) In sub-paragraph (l)(b) above and in paragraph 9(2) below, "executive decision" is to be construed in accordance with any regulations made by the Secretary of State under section 22 of the Local Government Act 2000.
- 7. A member must, if he becomes aware of any conduct by another member which he reasonably believes involves a failure to comply with the authority's code of conduct, make a written allegation to that effect to the Standards Board for England as soon as it is practicable for him to do so.

PART 2
INTERESTS
Personal Interests

- 8. (1) A member must regard himself as having a personal interest in any matter if the matter relates to an interest in respect of which notification must be given under paragraphs 14 and 15 below, or if a decision upon it might reasonably be regarded as affecting to a greater extent than other council tax payers, ratepayers or inhabitants of the authority's area, the well-being or financial position of himself, a relative or a friend or -
 - (a) any employment or business carried on by such persons;
 - (b) any person who employs or has appointed such persons, any firm in which they are a partner, or any company of which they are directors;
 - (c) any corporate body in which such persons have a beneficial interest in a class of securities exceeding the nominal value of £5,000; or
 - (d) any body listed in sub-paragraphs (a) to (e) of paragraph 15 below in which such persons hold a position of general control or management.
- (2) In this paragraph
 - (a) "relative" means a spouse, partner, parent, parent-in-law, son, daughter, step-son, step-daughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse or partner of any of the preceding persons; and
 - (b) "partner" in sub-paragraph (2)(a) above means a member of a couple who live together.

Disclosure of Personal Interests

- 9. (1) A member with a personal interest in a matter who attends a meeting of the authority at which the matter is considered must disclose to that meeting the

existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.

- (2) Subject to paragraph 12(1)(b) below, a member with a personal interest in any matter who has made an executive decision in relation to that matter must ensure that any written statement of that decision records the existence and nature of that interest.

Prejudicial Interests

10. (1) Subject to sub-paragraph (2) below, a member with a personal interest in a matter also has a prejudicial interest in that matter if the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgment of the public interest.
- (2) A member may regard himself as not having a prejudicial interest in a matter if that matter relates to
 - (a) another relevant authority of which he is a member;
 - (b) another public authority in which he holds a position of general control or management;
 - (c) a body to which he has been appointed or nominated by the authority as its representative;
 - (d) the housing functions of the authority where the member holds a tenancy or lease with a relevant authority, provided that he does not have arrears of rent with that relevant authority of more than two months, and provided that those functions do not relate particularly to the member's tenancy or lease;
 - (e) the functions of the authority in respect of school meals, transport and travelling expenses, where the member is a guardian or parent of a child in full time education, unless it relates particularly to the school which the child attends;
 - (f) the functions of the authority in respect of statutory sick pay under Part XI of the Social Security Contributions and Benefits Act 1992, where the member is in receipt of, or is entitled to the receipt of such pay from a relevant authority; and
 - (g) the functions of the authority in respect of an allowance or payment made under sections 173 to 176 of the Local Government Act 1972 or section 18 of the Local Government and Housing Act 1989.

Overview and Scrutiny Committees

11. (1) For the purposes of this Part, a member must if he is involved in the consideration of a matter at a meeting of an overview and scrutiny committee of the authority or a sub-committee of such a committee, regard himself as having a personal and a prejudicial interest if that consideration relates to a decision

made, or action taken, by another of the authority's -

- (a) committees or sub-committees; or
- (b) joint committees or joint sub-committees,

of which he may also be a member.

- (2) But sub-paragraph (1) above shall not apply if that member attends that meeting for the purpose of answering questions or otherwise giving evidence relating to that decision or action.

Participation in Relation to Disclosed Interests

- 12. (1) Subject to sub-paragraph (2) below, a member with a prejudicial interest in any matter must -
 - (a) withdraw from the room or chamber where a meeting is being held whenever it becomes apparent that the matter is being considered at that meeting, unless he has obtained a dispensation from the authority's standard's committee;
 - (b) not exercise executive functions in relation to that matter; and
 - (c) not seek improperly to influence a decision about that matter.

- (2) A member with a prejudicial interest may, unless that interest is of a financial nature, and unless it is an interest of the type described in paragraph 11 above, participate in a meeting of the authority's -

- (a) overview and scrutiny committees; and
- (b) joint or area committees,

to the extent that such committees are not exercising functions of the authority or its executive.

- 13. For the purposes of this Part, "meeting" means any meeting of -
 - (a) the authority;
 - (b) the executive of the authority; or
 - (c) any of the authority's or its executive's committees, subcommittees, joint committees, joint sub-committees, or area committees.

PART 3
THE REGISTER OF MEMBERS' INTERESTS
Registration of Financial and Other Interests

- 14. Within 28 days of the provisions of an authority's code of conduct being adopted or applied to that authority or within 28 days of his election or appointment to office (if that is later), a member must register his financial interests in the authority's register

maintained under section 81(1) of the Local Government Act 2000 by providing written notification to the authority's monitoring officer of

- (a) any employment or business carried on by him;
- (b) the name of the person who employs or has appointed him, the name of any firm in which he is a partner, and the name of any company for which he is a remunerated director;
- (c) the name of any person, other than a relevant authority, who has made a payment to him in respect of his election or any expenses incurred by him in carrying out his duties;
- (d) the name of any corporate body which has a place of business or land in the authority's area, and in which the member has a beneficial interest in a class of securities of that body that exceeds the nominal value of £25,000 or one hundredth of the total issued share capital of that body;
- (e) a description of any contract for goods, services or works made between the authority and himself or a firm in which he is a partner, a company of which he is a remunerated director, or a body of the description specified in sub-paragraph (d) above;
- (f) the address or other description (sufficient to identify the location) of any land in which he has a beneficial interest and which is in the area of the authority;
- (g) the address or other description (sufficient to identify the location) of any land where the landlord is the authority and the tenant is a firm in which he is a partner, a company of which he is a remunerated director, or a body of the description specified in sub-paragraph (d) above;
- (h) the address or other description (sufficient to identify the location) of any land in the authority's area in which he has a licence (alone or jointly with others) to occupy for 28 days or longer; and
- (i) the cost of any visit outside the United Kingdom for which the authority has paid, or will pay.

15. Within 28 days of the provisions of the authority's code of conduct being adopted or applied to that authority or within 28 days of his election or appointment to office (if that is later), a member must register his other interests in the authority's register maintained under section 81(1) of the Local Government Act 2000 by providing written notification to the authority's monitoring officer of his membership of or position of general control or management in any -

- (a) body to which he has been appointed or nominated by the authority as its representative;
- (b) *public authority or body exercising functions of a public nature;*
- (c) *company, industrial and provident society, charity, or body directed to charitable purposes;*

(d) *body whose principal purposes include the influence of public opinion or policy; and*

(e) *trade union or professional association.*

16. *A member must within 28 days of becoming aware of any change to the interests specified under paragraphs 14 and 15 above, provide written notification to the authority's monitoring officer of that change.*

Registration of Gifts and Hospitality

17. *A member must within 28 days of receiving any gift or hospitality over the value of £25, provide written notification to the authority's monitoring officer of the existence and nature of that gift or hospitality.*

APPENDIX B

THE GENERAL PRINCIPLES

1 SELFLESSNESS

1. Members should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.

Honesty and Integrity

2. Members should not place themselves in situations where their honesty and integrity may be questioned, should not behave improperly and should on all occasions avoid the appearance of such behaviour.

Objectivity

3. Members should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.

Accountability

4. Members should be accountable to the public for their actions and the manner in which they carry out their responsibilities, and should co-operate fully and honestly with any scrutiny appropriate to their particular office.

2 OPENNESS

5. Members should be as open as possible about their actions and those of their authority, and should be prepared to give reasons for those actions.

Personal Judgement

6. Members may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.

Respect for Others

7. Members should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the authority's statutory officers, and its other employees.

Duty to Uphold the Law

8. Members should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.

Stewardship

9. Members should do whatever they are able to do to ensure that their authorities use their resources prudently and in accordance with the law.

Leadership

10. Members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.

APPENDIX C

**Review of the Code of Conduct for Members
Response of Stevenage Borough Council**

Point	Comment
The general principles	
1 Should the ten general principles be incorporated as a preamble to the Code of Conduct?	Yes
2 Are there any other principles which should be included in the Code of Conduct?	No
Disrespect and freedom of speech	
3 Is it appropriate to have a broad test for disrespect or should we seek to have a more defined statement?	Keep it broad
4 Should the Code of Conduct include a specific provision on bullying? If so, is the ACAS definition of bullying quoted in the full consultation paper appropriate for this?	No, although the ACAS definition could be included in supporting guidance.
Confidential information	
5 Should the Code of Conduct contain an explicit public interest defence for members who believe they have acted in the public interest by disclosing confidential	No

information?	
6 Do you think the Code of Conduct should cover only information which is in law" exempt" or "confidential", to make it clear that it would not be a breach to disclose any information that an authority had withheld unlawfully?	Yes
Disrepute and private conduct	
7 Should the provision relating to disrepute be limited to activities undertaken in a member's official capacity or should it continue to apply to certain activities in a member's private life?	Should continue to apply to certain activities in a member's private life.
8 If the latter, should it continue to be a broad provision or would you restrict it solely to criminal convictions and situations where criminal conduct has been acknowledged?	Should continue to be a broad provision
Misuse of resources	
9 We believe that the Code should prohibit breaches of the publicity code, breaches of any local protocols, and misuse of resources for inappropriate political purposes. Do you agree?	Yes
10 If so, how could we define 'inappropriate political purposes'?	As in 4.4.3 supplemented by a de minimis provision in local guidance
11 Is the Code of Conduct right not to distinguish between physical and electronic resources?	Yes – both reflect cost/ resources - agree with approach in 4.4.9. Supplement with local guidance incorporating a de minimis provision
Duty to report breaches	
12 Should the provision of the Code of Conduct that requires members to report breaches of the Code by fellow members be retained in full, removed altogether, or somehow narrowed?	Narrowed
13 If you believe the provision should be narrowed, how would you define it? For example, should it apply only to misconduct in a member's public capacity, or only to significant breaches of the Code?	Only to significant breaches – agree with approach in 4.5.6
14 Should there be a further provision about making false, malicious or politically motivated allegations?	No – agree with approach in 4.5.13
15 Does the Code of Conduct need to provide effective protection for complainants against intimidation, or do existing sections of the Code of Conduct and other current legislation already cover this area adequately?	No change required
Personal interests	
16 Do you think the term 'friend' requires further definition in the Code of Conduct?	No
17 Should the personal interest test be narrowed so that members do not have to	Yes

declare interests shared by a substantial number of other inhabitants in an authority's area?	
18 Should a new category of 'public service interests' be created, relating to service on other public bodies and which is subject to different rules of conduct?	Yes but limited
19 If so, do you think public service interests which are not prejudicial and which appear in the public register of interests should have to be declared at meetings?	No
20 Do you think paragraph 10(2)(a-c), which provides limited exemption from the prejudicial interest rules for some members in certain circumstances, should be removed from the Code of Conduct?	Yes
21 Do you think less stringent rules should apply to prejudicial interests which arise through public service and membership of charities and lobby groups?	No but see answer to 23
Prejudicial interests	
22 Should members with a prejudicial interest in a matter under discussion be allowed to address the meeting before withdrawing?	No
23 Do you think members with prejudicial public service interests should be allowed to contribute to the debate before withdrawing from the vote?	Yes
Registration of interests	
24 <i>Should members employed in areas of sensitive employment, such as the security services, need to declare their occupation in the public register of interests?</i>	No
25 <i>Should members be required to register membership of private clubs and organisations? And if so, should it be limited to organisations within or near an authority's area?</i>	Yes/ Yes although the area limitation should not apply if the club or organisation has significant influence within the authority's area
Gifts and hospitality	
26 <i>Should the Code of Conduct require that the register of gifts and hospitality be made publicly available?</i>	Yes
27 <i>Should members also need to declare offers of gifts and hospitality that are declined?</i>	Yes if they exceed the threshold in point 29 below
28 <i>Should members need to declare a series of gifts from the same source, even if these gifts do not individually meet the threshold for declaration? How could we define this?</i>	Yes
29 <i>Is £25 is an appropriate threshold for the declaration of gifts and hospitality?</i>	No, should be increased. £40 is a reasonable balance.