

# AGENDA

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**Meeting:** Standards Committee

**Place:** Kennet Committee Room, County Hall, Bythesea Road, Trowbridge,  
BA14 8JN

**Date:** Wednesday 26 June 2019

**Time:** 10.00 am

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Please direct any enquiries on this Agenda to Kieran Elliott, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718504 or email [kieran.elliott@wiltshire.gov.uk](mailto:kieran.elliott@wiltshire.gov.uk)

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## Membership:

Cllr Derek Brown OBE

Cllr Allison Bucknell

Cllr Ernie Clark

Cllr Peter Evans

Cllr Peter Fuller

Cllr Howard Greenman (Vice-Chairman)

Cllr Ruth Hopkinson

Cllr Bob Jones MBE

Cllr Bob Jones MBE

Cllr Paul Oatway QPM (Chairman)

Cllr Fred Westmoreland

Cllr Stuart Wheeler

Mr Richard Baxter (non-voting)

Mr Philip Gill MBE (non-voting)

Mr Michael Lockhart (non-voting)

Miss Pam Turner (non-voting)

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## Substitutes:

Cllr Richard Britton

Cllr Trevor Carbin

Cllr Sue Evans

Cllr Nick Fogg MBE

Cllr Chris Hurst

Cllr Peter Hutton

Cllr George Jeans

Cllr Gordon King

Cllr Brian Mathew

Cllr Graham Wright

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## **Public Participation**

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#).

For assistance on these and other matters please contact the officer named above for details

# AGENDA

## Part I

*Items to be considered when the meeting is open to the public*

1 **Apologies**

To receive any apologies or substitutions for the meeting.

2 **Minutes** (*Pages 5 - 10*)

To confirm the minutes of the meeting held on 1 May 2019.

3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Chairman's Announcements**

To receive any announcements through the Chair.

5 **Public Participation**

The Council welcomes contributions from members of the public.

Statements

If you would like to make a statement at this meeting on any item on this agenda, please register to do so at least 10 minutes prior to the meeting. Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item. Please contact the officer named on the front of the agenda for any further clarification.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution.

Those wishing to ask questions are required to give notice of any such questions in writing to the officer named on the front of this agenda no later than 5pm on 19 June 2019 in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on 21 June 2019. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

- 6      **Status Report on Code of Conduct Complaints** *(Pages 11 - 14)*  
To receive a report from the Monitoring Officer on Code of Conduct complaints.
- 7      **Recommendations from the Constitution Focus Group** *(To Follow)*  
To receive a report from the Monitoring Officer on recommendation from the Constitution Focus Group on proposed changes to the Constitution.
- 8      **Amendment to the Terms of Reference of the Constitution Focus Group**  
*(Pages 15 - 18)*  
To receive a report from the Monitoring Officer on a proposal to amend the terms of reference of the Constitution Focus Group.
- 9      **Publication of Code of Conduct Decision Notices** *(Pages 19 - 22)*  
To receive a report from the Monitoring Officer on decision notices.
- 10     **Urgent Items**  
Any other items which the Chairman agrees to consider as a matter of urgency.

## **Part II**

*Item(s) during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed*

## STANDARDS COMMITTEE

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### MINUTES OF THE STANDARDS COMMITTEE MEETING HELD ON 1 MAY 2019 AT KENNET ROOM - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

#### **Present:**

Cllr Derek Brown OBE, Cllr Allison Bucknell, Cllr Ernie Clark, Cllr Peter Evans, Cllr Howard Greenman (Vice-Chairman), Cllr Ruth Hopkinson, Cllr Paul Oatway QPM (Chairman), Cllr Fred Westmoreland, Cllr Stuart Wheeler, Cllr Gordon King (Substitute) and Mr Michael Lockhart

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#### 11 **Apologies**

Apologies were received from Councillors Peter Fuller and Bob Jones, Mr Phillip Gill, Mr Richard Baxter and Miss Pam Turner.

Councillor Jones was substituted by Councillor Gordon King.

#### 12 **Minutes**

The minutes of the meeting held on 23 January 2019 were presented for consideration and it was,

#### **Resolved:**

**To approve and sign the minutes as a true and correct record.**

#### 13 **Declarations of Interest**

There were no declarations.

#### 14 **Chairman's Announcements**

There were no announcements.

#### 15 **Public Participation**

There were no questions or statements submitted.

#### 16 **Status Report on Complaints**

Sukdave Ghuman, Team Leader Public Law and Compliance, presented a report on the status of existing code of conduct complaints. Details were provided of the number of complaints received, the nature of the complaints and the outcomes of any assessments concluded.

The Committee discussed the report, noting a number of complaints dismissed due to having been submitted out of time, and instances of past complaints which had taken a long time to resolve. The Committee noted the ongoing review of the procedure to be discussed at Minute Item 19.

**Resolved:**

**To note the update.**

17 **Committee on Standards in Public Life**

A report from the Monitoring Officer summarising the report of the Committee on Standards in Public Life regarding its review of Local Government Ethical Standards was presented. The report had followed a consultation in 2018, to which the Standards Committee had delegated preparation of a response, which was attached to the agenda papers.

The Committee on Standards in Public Life had reached a number of conclusions including that the introduction of an updated model Code of Conduct would aid clarity and consistency, that towns and parishes should be required to adopt the Code of their principal authority, and that existing sanctions for breaches were insufficient, recommending that the ability to suspend members be reintroduced.

The Standards Committee noted the conclusions of the Committee on Standards in Public Life, in particular that many of its recommendations would require the introduction of primary legislation, and therefore would not be implemented for some time even if adopted by central government. Therefore, they focused on the list of best practice recommendations compiled by the Committee on Standards in Public Life, which it had recommended all local authorities adopt where they were not already operating in such a fashion.

The Committee considered that with provisions regarding bullying and harassment included in the guidance to the Code of Conduct as an example of behaviour which might not uphold high standards of conduct, there was not a need to amend the Code. It was also noted that the assessment criteria in Wiltshire already prohibited trivial or malicious allegations by any persons, and a public interest test, though actually enforcing cooperation with any standards assessment or investigation as recommended was not achievable, though was very much encouraged and usually undertaken.

The Committee noted that it was currently reviewing the arrangements for dealing with Code of Conduct complaints, and that this was felt to be more effective than the best practice recommendation that the Code itself was reviewed each year, including public consultation. It was felt a review in advance of the next election was more appropriate than committing to annual reviews which would not result in a great deal of amendment.

The Committee felt that the Code and arrangements were available on the website as recommended, although work would continue on making it as prominent and easy to access as possible. In relation to gifts and hospitality it was noted that there was not a requirement to declare gifts under the Wiltshire code, but that any such declarations were updated as they were made.

It was considered that with three independent persons who were consulted at each stage of the process the arrangements in Wiltshire easily met the best practice recommendations. In relation to publication of decision notices it was noted there was a balance between being open and transparent and which details should be considered private, and this would be considered in the ongoing review of the process.

Concerns were expressed at recommendations regarding complaints regarding member conduct toward a parish council clerk, given the limited resources and part time nature of the role, and the lack of ability for the principal authority to encourage such changes as proposed.

The Committee agreed that there were adequate procedures in place regarding conflicts of interest and updating political groups.

In discussing the best practice recommendations as fully detailed in the agenda papers, the Committee agreed that any changes to practice or procedure should be recommended by the Constitution Focus Group taking into account the views expressed above.

**Resolved:**

**For the Constitution Focus Group to consider the report and make such recommendations as felt appropriate.**

18 **Recommendations from the Constitution Focus Group**

A report was received from the Monitoring Officer outlining proposed changes to the Constitution as recommended by the Constitution Focus Group.

Part 10 of the Constitution was in relation to procurement and contract regulations. This had been updated to further simplify the regulations and clarify processes to be followed including the correction of now out of date information and the responsibilities of roles within the Council. The Focus Group had considered the changes appropriate and necessary, and the Committee was content to recommend the proposals for adoption by Full Council.

Protocol 8 was in relation to partnership working, but after review was recommended to be removed as it was not fit for purpose, sitting outside and at odds with the council's present commercial policy and approach. The Audit Committee was in agreement with the approach of removing the document, to be replaced by a partnership working framework to be adopted by Cabinet, which was felt to be a more appropriate level for the framework to be approved.

Protocol 10, which would become Protocol 9 after the partnership protocol was removed, related to the Code of Corporate Governance. The document had not been reviewed since 2010, and a revised version had been prepared to reflect Chartered Institute of Public Finance and Accountancy guidance. Both the Constitution Focus Group and Audit Committee had agreed the new protocol.

At the conclusion of discussion, it was,

**Resolved:**

**To recommend Council approve the revised Part 10 and Protocol 10 of the Constitution and remove Protocol 8 of the Constitution.**

19 **Review of Protocol 12 of the Constitution**

At its meeting on 23 January 2019 the Standards Committee requested the Constitution Focus Group to oversee a review of the procedures relating to code of conduct complaints in response to concerns expressed to the Committee regarding the timeliness of dealing with complaints under the process. This also followed a review of the processes adopted by other local authorities in handling of code of conduct complaints. The arrangements operated by Wiltshire Council were last reviewed in February 2017.

The Constitution Focus Group discussed the arrangements and associated documentation at its meetings on 20 March 2019 and 10 April 2019. The Chairman and Vice-Chairman of the Standards Committee also discussed the arrangements at a meeting with officers and the Council's Independent Persons on 12 March 2019.

The Constitution Focus Group had considered and was proposing a new arrangement for assessment of complaints wherein the Monitoring Officer would prepare a recommendation for determination by an Assessment Sub-Committee. This would enhance the role of elected members by ensuring involvement in all complaints, not merely those requested for review after determination by the Monitoring Officer. Accordingly, there would be no need for ad-hoc review sub-committees as these had been included in the process to provide member involvement.

The Focus Group considered this approach in addition to enhancing the role of elected members, would be administratively simpler with regularly scheduled meetings known to all members, eliminating delays caused by availability constraints of members and officers.

The Committee discussed the proposals, seeking information on how the assessment sub-committee would be constituted, and whether the need to prepare recommendations to the assessment sub-committee would increase pressure on resources. The Committee considered that the proposals did appear to streamline the process and requested full details for determination at its next meeting.



**Resolved:**

**To note the update and receive further details at the next meeting.**

20 **Urgent Items**

There were no urgent items.

(Duration of meeting: 9.30 - 10.45 am)

The Officer who has produced these minutes is Kieran Elliott of Democratic Services,  
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**Wiltshire Council**

**Standards Committee**

**26 June 2019**

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## **Code of Conduct Complaints - Status Report**

### **Statutory Background**

1. All local authorities are required, by s.28 Localism Act 2011, to adopt a code of conduct for their members. All such codes are required to cover the following:
  - The principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership
  - The registration and disclosure of pecuniary and other interests
2. Wiltshire Council, as a principal authority, is required to have in place arrangements for investigating and determining allegations that a member of the Council, or a member of a parish council within the council's area, has failed to comply with the relevant Code of Conduct.
3. These arrangements must include the appointment of at least one independent person, whose views must be taken into account before a decision is made on any alleged breach of a code of conduct.

### **Council Structure and Procedures**

4. Wiltshire Council's arrangements for considering complaints about alleged code of conduct breaches are set out in Protocol 12 to the Constitution. All complaints are subject to an initial assessment on behalf of the Monitoring Officer, having sought comments from the Subject Member (the councillor who is the subject of the complaint). This initial assessment may conclude that no further action should be taken; it may refer the complaint for investigation or it may recommend that an alternative resolution be explored with the parties.
5. Both parties (the Complainant and the Subject Member) have a right to a review of the initial assessment. This is considered by the Review Sub-Committee of the Standards Committee.
6. If it is determined that a formal investigation should be undertaken (either at the initial assessment stage or by the Review Sub-Committee), an investigating officer is appointed by the Monitoring Officer. If the investigating officer finds that there has been a breach of the Code of Conduct, and the Monitoring Officer on reviewing the investigation report concludes that alternative resolution is not appropriate, then a Standards Hearing Sub-Committee will be convened. This will conduct a hearing into the complaint to determine whether there has been a breach of the Code and, if so, what sanctions, if any, should be applied to the Subject Member. If the Subject Member is a member of a town or parish council, the Hearing Sub-Committee's

decision regarding sanctions will be in the form of a recommendation to the relevant council.

7. The full Standards Committee has oversight of the operation of the procedures for dealing with Code of Conduct complaints as well as a general responsibility to promote and maintain high standards of conduct by elected and co-opted members and officers.

### **Summary of complaints received 1 April 2019 to 18 June 2019**

8. Between 01 April 2019 and 18 June 2019, the Monitoring Officer received 9 complaints under the Code of Conduct. Of these complaints, 1 concerned a member of Wiltshire Council, while the remainder of 8 were against members of town and parish councils within the authority's area.
9. Of the cases received, the current position is as follows:

Complaints currently awaiting assessment	6
No further action to be taken	3

10. There are four cases that were received before 1 April that remain to be finally determined. Two were the subject of investigations which were conducted by external investigators who are in the process of finalising their reports. One case is being considered for mediation and in one case the assessment has been delayed due to issues raised by the parties, but is expected to be completed shortly.

### **Investigations**

11. Since the beginning of June 2019, no complaints have been referred for investigation on assessment.

### **Types of Complaint**

12. The types of complaints received are categorised as follows:

Type of complaint	Number
Non-disclosure of interests/participating and voting at meetings	1
Inappropriate behaviour i.e. disrespect/bullying	3
Failure to act in the public interest	4
Failing to respond to letter/emails or to provide information/lack of communication	0
Slander/defamation of character	0
Not executing duties with honesty & integrity	0
Bribery of councillor	0

Inappropriate use of social media	1
Failure to promote high standards of conduct	0
Bringing council into disrepute	0
Conferring an advantage/disadvantage	0
<b>Total</b>	<b>9</b>

### **Recommendation**

13. To note the current position on Code of Conduct Complaints

**Ian Gibbons, Director of Legal, Electoral and Registration Services (and Monitoring Officer)**

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Report Author: Sukdave Ghuman, Team Leader, Public Law and Compliance  
[Sukdave.ghuman@wiltshire.gov.uk](mailto:Sukdave.ghuman@wiltshire.gov.uk)

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## Wiltshire Council

### Standards Committee

26 June 2019

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### Constitution Focus Group Terms of Reference

#### Purpose of Report

1. This report asks the Standards Committee to consider amending the Terms of Reference of the Constitution Focus Group

#### Background

2. The Standards Committee has responsibility for oversight of the Council's constitution. It has established a cross party working group, known as the Constitution Focus Group, to advise and assist in carrying out this function.
3. At its meeting on 26 September 2019 the Standards Committee agreed to appoint a named councillor as a substitute for the Chairman of the Committee, who is a member of the Focus Group by virtue of his office

#### Main Considerations

4. The membership of the Focus Group comprises representatives from each political group on the Council, along with representatives of Overview and Scrutiny and the Audit Committee.
5. There is additionally a membership place for the Chairman of the Standards Committee.
6. In light of the decision of the Committee in September 2019, it is proposed to amend the terms of reference of the Focus Group such that any member of the Standards Committee may be appointed to its membership. This would be in keeping with the other representatives on the Focus Group.
7. It is also proposed, therefore, that the existing stand in for the Chairman of the Committee on the Focus Group, be appointed as a member of the Focus Group in his own right.

#### Safeguarding Implications

8. There are no safeguarding issues arising from this report.

#### Equalities Impact of the Proposal

9. There are no equalities impacts arising from this report.

#### Risk Assessment

10. There are no risk issues arising from this report.

### **Financial Implications**

11. There are no financial implications arising from this report.

### **Legal Implications**

12. There are no legal implications

### **Public Health Impact of the Proposals**

13. There are no public health impacts arising from this report.

### **Environmental Impact of the Proposals**

14. There are no environmental impacts arising from this report.

### **Proposal**

15. **To amend the terms of reference of the Constitution Focus Group as set out in Appendix 1.**

**Ian Gibbons, Director, Legal, Electoral and Registration Services (and Monitoring Officer)**

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Report Author: Kieran Elliott, Senior Democratic Services Officer, 01225 718504,  
[kieran.elliott@wiltshire.gov.uk](mailto:kieran.elliott@wiltshire.gov.uk)

### **Background Papers**

None

### **Appendices**

Appendix 1 – Revised Terms of Reference (Constitution Focus Group)



## Appendix 1 –

### CONSTITUTION FOCUS GROUP TERMS OF REFERENCE

#### Function

To undertake the following:

- ongoing review work on the constitution as and when required;
- producing user friendly summaries of the relevant parts of the constitution for use by members of the public and members of the Council and specifically to review the constitution in light of any changes in the legislation
- To consider the views of (as appropriate):
  - elected and co-opted members of the Council
  - officers
  - decision making bodies of the Council
  - town, parish and city councils and
  - members of the publicascertained through questionnaire responses and appropriate methods of communication and make appropriate recommendations
- To offer a councillor perspective on and accordingly to influence key issues within the constitution.
- To advise the Standards Committee of final recommendations on any changes to the constitution for consideration and onward recommendation to Council.

#### Membership

- (i) a member from each political group on the Council nominated by group leaders;  
**Conservative:**  
**Liberal Democrat:**  
**Independent:**  
**Labour:**
- (ii) a member of the Overview and Scrutiny Management Committee;
- (iii) a member of the Audit Committee;
- (iv) two co-opted non-voting members of the Standards Committee (**at least** one of which to be a town/parish representative);
- (v) ~~the Chairman~~ **A member** of the Standards Committee and
- (vi) that appropriate Councillors and Officers are invited to attend as and when requested by the Focus Group or its Chairman to assist it in its work.

#### Chairmanship

A chairman will be selected by the Focus Group from among its membership

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## Wiltshire Council

### Standards Committee

26 June 2019

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#### Publication of Code of Conduct Decision Notices

##### Purpose of Report

1. The purpose of this report is to consider the adoption of arrangements for publicising Code of Conduct Decision Notices, following a determination that no further action is to be taken on a complaint.

##### Background

2. At present, the Council has no policy on whether or not Code of Conduct Decision Notices will be made public, following the completion of an initial assessment ( either by the Monitoring Officer or following a Standards Review Sub-Committee), or following an investigation, where it is determined that no further action is to be taken. The current arrangements provide that all matters relating to a Code of Conduct complaint are to be kept confidential until determined otherwise by the Monitoring Officer, Review Sub-committee or Hearing Sub-Committee.
3. This issue has arisen following requests by some Subject Members that the outcomes be made public and in light of the recent First Tier Tribunal Information Rights decision in the case of [Cyril Bennis v ICO and Stratford-on-Avon District Council 2018](#).
4. The [Bennis](#) case involved a request from a code of conduct complainant for all correspondence relating to his complaint against a member of Stratford-on-Avon DC, which had not been upheld by the Monitoring Officer. The Tribunal determined that it would not be appropriate to disclose details of unsubstantiated code of conduct complaints, as it was necessary to consider the rights of the subject member as a data subject. The Tribunal concluded that the Council could not disclose the councillor's personal data in this case, without breaching the data protection principles. The Tribunal did not, unfortunately, go on to explain why they felt that disclosure of the assessment report would be a breach of those principles.
5. This appeal was determined at a time when the Data Protection Act 1998 was still in force. The relevant requirements of the 1998 Act provided that personal data should not be processed (including by way of publication) unless that processing was 'fair and lawful' and that the data subject had either given consent to the processing or that the processing was necessary for the purposes of the legitimate interests of the Council as data controller, unless that would prejudice the legitimate interests or rights of the data subject
6. There is an argument that such disclosure would be fair and that it was necessary for the purposes of the legitimate interests of the Council in showing transparency in its standards processes. However, the Information Commissioner has generally

interpreted the term 'necessary' fairly restrictively and disclosure would only meet this test if there were no other way of achieving the outcome sought.

7. The DPA 1998 has now been replaced by the GDPR and the DPA 2018. Although different wording is used in relation to the principles, the same general approach is taken, in terms of fairness and lawfulness.

### **Main Considerations**

8. The initial assessment decision notices prepared on behalf of the Monitoring Officer include personal data relating to both the Complainant and the Subject Member. Depending on the nature of the complaint, the Notice may set out details of correspondence between the two parties and also information about other third parties which may be relevant to the issues or events that form the basis of the complaint. It is therefore appropriate to consider the data protection issues for the various parties in turn.

### The Complainant

9. The current complaint form asks for certain personal data about the Complainant (name and address etc.) and states that the Subject Member will be made aware of the Complainant's identity, in the interests of fairness for the Subject Member. The Complainant is given the opportunity to say whether they wish their details to be withheld from the Subject Member. This only occurs in a very few cases. In most cases the Subject Member is sent a copy of the complaint form, with the Complainant's contact details redacted, but with their name included.
10. The complaint form needs to be updated and revised to include a privacy notice setting out how any personal data will be processed. If it is intended that the assessment decision notice will ultimately be published with the name of the Complainant, then this needs to be made clear at the outset on the form.
11. In addition to amendments to the complaint form, there are two options to be considered in respect of the Complainant, in addressing the question of publication of the decision notices. The first is to seek views from the Complainant once the Notice has been finalised and issued to the parties. The Monitoring Officer can then consider any objections that the Complainant may have to publication and determine whether it is fair to publish the Notice. This may include redaction of some personal data from the published notice, or the publication of a summary of the decision.
12. The second option is to exclude the Complainant's details from the published notices as a matter of course. Depending on the nature of the complaint, this may well not be sufficient to prevent identification of the Complainant. In that case, consideration would need to be given to producing and publishing a summary version of the decision notice, excluding any identifying information.

13. It is not considered that it would be sufficient just to seek consent from the Complainant to publication of their details in the eventual decision notice, as part of the complaint form. Clearly, at the time that the complaint is made, the Complainant will have no idea what the decision notice will eventually say about him/her, so they would not really be in a position to give informed consent, or would at least be very wary about such consent.

#### Subject Member

14. Where a complaint has not been upheld, it is likely that, in some cases, the Subject Member would be quite happy for that decision to be made public as it would show that they had been exonerated by the assessment process. The last two queries about publication were made by Subject Members wanting to be able to publicise the assessment decision to show that the complaints against them ( which were known about locally) had been dismissed and the reasons for that.

15. In any event, there may be more justification in publicising the name of the Subject Member than the name of the Complainant. Firstly, consideration would only be given to publicising the outcome of a complaint once it had been concluded. At that time it would have been determined either that there had been no breach of the Code (in which case it may well be to the Subject Member's benefit for that to be made public) or that there had been a breach, in which case there would generally have been a public hearing and a public decision or censure. Other than that, the same principles apply as with the Complainant's details.

#### **Safeguarding Implication**

16. There are no safeguarding issues arising from this report

#### **Equalities Impact of the Proposal**

17. There are no equalities issues arising from this report

#### **Risk Assessment**

18. There would be a risk of a complaint to the Information Commissioner in the event that persona data was disclosed in beach of the requirements of the Data Protection legislation.

#### **Financial Implications**

19. There are no financial implication arising from this report

#### **Legal Implications**

20. These are addressed in the report

#### **Public Health Impact of the Proposals**

21. There are no public health impacts arising from this report

## **Environmental Impact of the Proposals**

22. There are no environmental impacts arising from this report

### **Recommendation**

23. The Committee is recommended to consider the adoption of the following approach to the publication of Code of Conduct Decision Notices:
- a. That on completion of the code of conduct process (where the matter does not lead to a hearing) once the parties have seen the final decision notice, they are informed that the notice will be published on the Council's website and are given an opportunity to make representations as to why their personal details should be excluded
  - b. If representations are made, consideration is given by the Monitoring Officer to redacting the published decision notice, or publishing a summary of the decision.
  - c. That an appropriate data protection privacy notice is included on the complaint form

**Ian Gibbons, Director of Legal, Electoral and Registration Services (and Monitoring Officer)**

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Report Author: Paul Taylor, Senior Solicitor, paul.taylor.wiltshire.gov.uk

### **Appendices**

None

### **Background Papers**

[Cyril Bennis v ICO and Stratford-on-Avon District Council 2018.](#)