AGENDA

1. Apologies

2. Declarations of Interest – please ensure you inform the Governance Officer if you have any interests on any item of the agenda in advance of the meeting.

3. Minutes of the meeting of the GMCA Standards Committee held 2 November 2017

4. Short Guide to the Code of Conduct for Members
   Report of Gwynne Williams, Deputy Monitoring Officer, GMCA

5. GMCA Anti-fraud and Corruption Policies
   Report of Tom Powell, Head of Internal Audit, GMCA

   Report of Gwynne Williams, Deputy Monitoring Officer, GMCA

7. GMCA Standards Committee Work Programme 2018/19
   Report of Julie Connor, Assistant Director of Governance, GMCA
8. Dates of future meetings

Contact officer:
Nicola Ward – Governance and Scrutiny – 
Nicola.ward@greatermanchester-ca.gov.uk
GMCA Standards Committee

Declaration of Member’s Interests in Items Appearing on the Agenda

NAME: ______________________________

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<thead>
<tr>
<th>Minute Item No. / Agenda Item No.</th>
<th>Nature of Interest</th>
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Minutes of the GMCA Standards Committee Meeting held
Thursday 2 November 2017 at Churchgate House, Manchester

Present

Geoff Linnell Co-opted Independent Member
Councillor Alex Ganotis Stockport MBC
Councillor Jean Stretton Oldham Council

Also in attendance

Nicole Jackson Independent Person
Steve Hollard GMCA Lawyer
Gwynne Williams GMCA Solicitor
Tom Powell GMCA Head of Internal Audit
Nicola Ward GMCA Governance

GMSC 17/01 Welcome and Apologies
The Chair welcomed members to the GMCA Standards Committee. Apologies were received from Councillor Cliff Morris, Councillor Paul Dennett and Councillor Sean Anstee.

GMSC 17/02 Declarations of interest
There were no declarations of interest in relation to any matter on the agenda.

GMSC 17/03 Minutes of the GMCA Standards Committee meeting held 16 March 2017
Resolved /-
1. To approve the minutes of the GMCA Standards Committee held on 16 March 2017.

GMSC 17/04 Scope of Application of the GMCA Code of Conduct for Members
Members received a report of Liz Treacy, Monitoring Officer for the GMCA which briefed the committee on the scope of application of the GMCA Code of Conduct for Members as per their request at their meeting on 16 March 2017.
The committee’s comments were taken into account when the Code was updated as part of the 2017 revision of the GMCA’s Constitution. In the report to the GMCA 30 June meeting it summarised the revised Code as

“8.1 The Code of Conduct for Members has been updated. There has been clarification of who the code applies to as per the recommendation of the GMCA’s Standards Committee. It now makes clear the existing statutory position that the code applies to all voting co-opted members of GMCA committees as well as to GMCA members. It is now clear that, for example, the members of the Audit Committee and any Overview and Scrutiny Committee(s) are subject to the Code.

8.2 The revised Code of Conduct for Members also invites voluntary compliance with the code by non-voting co-opted members and by elected members of Greater Manchester district councils when they act for or represent the GMCA (such as by sitting on non-decision making bodies such as the Planning and Housing Commission).”

Steve Hollard, Senior Lawyer to the GMCA reiterated to the committee that the GMCA Code of Conduct applies to all voting co-opted members of GMCA committees as well as GMCA members. Those members who have been appointed to non-decision making bodies and all independent members would be invited to voluntary comply with the Code. He confirmed that sanctions can be applied to all members including those who voluntary comply.

Members thanked officers for this clarification, but asked whether all members of the GMCA and its committees were now compliant i.e. voting co-opted members, substitutes, deputy portfolio holders. Further to this, whether those who would be required to voluntary comply, have completed the relevant paperwork.

A member asked whether the GMCA’s Gifts and Hospitality Policy is up to date and that all members are aware of their requirements to disclose.

It was suggested that there be a basic summary of the Code circulated to all members of the GMCA and its committees to ensure that they are all aware of their obligations.

A member sought further clarification on the role of the Assistant Portfolio Holders and which meetings they were invited to attend. It was suggested that a training session on this subject as part of a member induction programme would be useful. Further to this, whether there could be an item on the agenda of each of the committee’s first meeting reminding members of their obligations under the Code.

Resolved /-

1. To note the report.
2. That the Governance Team will check which members are required to comply with the Code of Conduct, voluntary or legally and bring some assurance to the next meeting.
3. That the Governance Team check that all members are aware of their obligations to disclose gifts and hospitality to the GMCA.
4. That the Legal Team develop a short and simple document which can be circulated to all members of the GMCA and its committees to explain their obligations under the Code.
5. That the Governance Team provide further information to Assistant Portfolio Holders as to which meetings they are invited to attend in their role.
6. That the Governance Team schedule a member induction for all members of the GMCA and its committees early in the municipal year, and include training on the Code of Governance, and consider the suggestion to include an item on the agenda of the first meeting of each of the committees reminding members of their obligations under the Code.

GMSC 17/05 Annual Report and Work Plan of the Committee on Standards in Public Life

Members received a report of the GMCA Monitoring Officer which detailed the relevant information from the Annual Report of the Committee on Standards for Public Life.

Steve Hollard, Principal Lawyer for the GMCA reported that the Committee retain their watching brief over Local Government standards.

Members discussed how in the context of devolution there should be a greater emphasis on Local Government within the report. Officers offered to feed this back through the consultation.

Resolved /-

1. To note the report.
2. That the Legal Team feed back the views of the committee through the consultation on the Annual Report of the Committee on Standards in Public Life.

GMSC 17/06 GMCA Standards Committee Work Programme

Nicola Ward, Governance Officer for the GMCA took members through the Work Programme for the GMCA Standards Committee which had been based around those policies to which the committee have a remit for reviewing as per their terms of reference.

Members commented that the work programme of the Manchester City Council’s Standards Committee details all sub sections of the Code of Conduct, i.e. gifts and hospitality, member/officer relations etc. Each policy is reviewed against its operation and procedures on an annual basis and in depth every three years. It was suggested that the GMCA Standards Committee work programme could be expanded to include those sub sections from the GMCA’s Code.
The committee asked for assurance that if it was not their role in reviewing a particular policy, that they were clear as to by which committee this would be done.

Resolved /-

1. To note the report.
2. That the Governance Team produce a detailed work programme based on the sub-sections of the Code of Conduct and bring it to the next meeting for review.

GMSC 17/07 Any other business

There was no additional business.

GMSC 17/08 Dates of future meetings

Resolved /-

1. The next meeting of the GMCA Standards Committee is scheduled for Thursday 15 March 2018.
GMCA - Standards Committee

Date: 12 February 2019

Subject: Short Guide to the Code of Conduct for Members

Report of: GMCA Monitoring Officer

PURPOSE OF REPORT

At the meeting of the Standards Committee on 2 November 2017 the Committee asked for a short and simple document to be developed which could be circulated to all members of the GMCA and its committees to explain their obligations under the Code.

A draft document is attached for the Committee’s consideration.

RECOMMENDATIONS:

The Committee is recommended to:

Consider the draft guide and provide feedback.

CONTACT OFFICERS:

Name: Liz Treacy
Position: Monitoring Officer, GMCA
E-mail: l.treacy@greatermanchester-ca.gov.uk

Name: Gwynne Williams
Position: Deputy Monitoring Officer, GMCA
Telephone: 0161 608 4007
E-mail: williamsg@manchesterfire.gov.uk

Risk Management – none
Legal Considerations – ensuring compliance with the Code of Conduct
Financial Consequences – none
Financial Consequences – none

**BACKGROUND PAPERS:**

GMCA Code of Conduct for Members

<table>
<thead>
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SHORT GUIDE

GMCA CODE OF CONDUCT FOR MEMBERS

1. WHO

Mandatory for

The Mayor
Members of GMCA
Substitute Members of GMCA
Voting Co-opted Members of GMCA’s committees
Appointed Members of Joint Committees

Voluntary for

Non-voting Co-opted Members of GMCA’s committees
Elected members from GM districts when they represent GMCA

2. WHEN

Acting in your official capacity, and

In meetings of:

• GMCA; or

• GMCA’s Committees or Sub-Committees, Joint Committees or Joint Sub-Committees

3. CONDUCT

General Principles

Selflessness: the public interest not personal gain
Integrity: avoid undue influences
Objectivity: decisions made on merit
Accountability: scrutiny is the norm
Openness: transparent decisions with reasons
Honesty: declare interests and avoid conflicts
Leadership: lead by example.
DO NOT

- Unlawfully discriminate
- Bully or be abusive
- Intimidate a complainant, a witness, or an investigator under the Code of Conduct
- Compromise the impartiality of GMCA’s officers
- Disclose confidential information without authority
- Deny lawful access to information
- Bring GMCA into disrepute
- Abuse your position
- Use GMCA’s resources improperly

DO

- Pay due regard to the advice of the Treasurer and Monitoring Officer
- Register your interests
- Declare your interests

INTERESTS

A. Pecuniary interests (you, your spouse or your partner)

Register within 28 days

- Employment or other paid office
- Sponsorship – payment in respect of expenses as a Member of GMCA, or election expenses.
- Contracts – between you/your partner (or a body in which you or your partner has a beneficial interest) and GMCA:
- Land you have an interest in within Greater Manchester
- Corporate Tenancies – where GMCA is the landlord you/your partner (or a body in which you or your partner has a beneficial interest) is the tenant
- Securities – you have a beneficial interest in securities of a body which has a place of business or land in the area of the GMCA

Do not speak or vote at a meeting on a matter in which you have a disclosable pecuniary interest

Disclose the interest at the meeting

Withdraw from the meeting

It is a criminal offence to fail to register disclosable pecuniary interests and to participate in any discussion or vote on a matter in which you have a disclosable pecuniary interest.
B. Other Interests

Personal Interests

You have a personal interest -
- If your well-being or financial position would be affected (i.e. more so than other ratepayers)
- If the well-being or financial position of somebody close to you would be affected or the organisations in which they are employed
- If the well-being or financial position of body referred to below would be affected
  - A body of which you are in a position of general control or management and to which you are appointed or nominated by GMCA;
  - A body of which you are in a position of general control or management which
    i. exercises functions of a public nature;
    ii. is directed to charitable purposes; or
    iii. one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union),
  - the interests of any person from whom you have received a gift or hospitality with an estimated value of at least £100.

Disclose the interest at the meeting

You may speak and vote

Prejudicial Interests

You have a prejudicial interest -

Where your personal interest is one which a member of the public would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest and it:

- affects your financial position (or those persons or bodies referred to in section B above); or
- relates to the determining of any approval, consent, licence, permission or registration

Do not speak or vote at a meeting on a matter in which you have a prejudicial interest

Disclose the interest at the meeting

Withdraw from the meeting
GMCA Standards Committee

12 February 2019

Anti Fraud and Corruption Policies

<table>
<thead>
<tr>
<th>Report Of</th>
<th>Treasurer to the Greater Manchester Combined Authority</th>
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<td>Head of Audit and Risk Management</td>
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<tr>
<th>Contact officer:</th>
<th>Richard Paver  Treasurer to GMCA</th>
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<tr>
<td></td>
<td>0161 778 7004</td>
</tr>
<tr>
<td></td>
<td>E-mail <a href="mailto:richard.paver@manchester.gov.uk">richard.paver@manchester.gov.uk</a></td>
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<tr>
<th></th>
<th>Tom Powell  Head of Audit and Risk Management</th>
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<tbody>
<tr>
<td></td>
<td>0161 234 5273</td>
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<tr>
<td></td>
<td>E-mail <a href="mailto:t.powell@manchester.gov.uk">t.powell@manchester.gov.uk</a></td>
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<th>Wider Leadership Team Lead Officer:</th>
<th>Richard Paver  Treasurer to GMCA</th>
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PURPOSE OF THE REPORT
This report presents to Standards Committee an update on the current position in respect of anti-fraud and corruption policies for GMCA along with details regarding the development of the anti-fraud framework.

RECOMMENDATION
Standards Committee is asked to note the current position and the planned steps to update and communicate the anti-fraud and corruption policies.

PRIORITY
The prevention and detection of fraud and corruption helps protect financial assets, ensure legality and maintain a positive reputation for the GMCA. In demonstrating a zero tolerance approach to fraud and corruption the GMCA promotes confidence with officers, Members, stakeholders and the public and by investigating issues of potential fraud or corruption the GMCA demonstrates transparency, openness and a willingness to address matters of wrongdoing.
BACKGROUND DOCUMENTS
Report presented to Audit Committee:

RISKS/IMPLICATIONS
Financial: Cost of Internal Audit Services within GMCA budget.
Staffing: No impact
Policy: No impact
Equal Opportunities - Has a Diversity Impact Assessment been conducted? No

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<th>AGMA Commission</th>
<th>TfGM</th>
<th>Scrutiny Pool</th>
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<td>N/A</td>
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BOLTON  MANCHESTER  ROCHDALE  STOCKPORT  TRAFFORD
BURY  OLDHAM  SALFORD  TAMESIDE  WIGAN
1 Introduction and Purpose of the Report

1.1 In accordance with the Accounts and Audit Regulations and the principles of good governance the Greater Manchester Combined Authority (GMCA) is required to maintain appropriate systems of internal control, including arrangements to prevent and detect fraud and corruption.

1.2 The GMCA Standards Committee is by virtue of the constitution required to have an oversight of the Authority’s Whistleblowing Policy.

1.3 The purpose of this report is to update Members on the current position in respect of the current Anti-Fraud and Corruption Framework; which includes the Whistleblowing Policy. It also sets out the proposed approach for the review and update of these documents for 2019/20.

2 Background and Context

2.1 The GMCA is committed to ensuring that the people of Greater Manchester can have complete confidence that the affairs of the GMCA are conducted in accordance with the highest standards of probity and honesty.

2.2 In seeking to ensure this commitment is met, the GMCA has an Anti-Fraud and Corruption Policy Framework which establishes its approach to combating fraud, corruption and wrongdoing. The framework consists of various anti-fraud related policies, supporting procedural documents and behavioural codes which describe the arrangements in place for preventing, detecting and investigating fraud and error. These together with a strong internal control environment are the main methods to help protect the GMCA against the risk of fraud. The Internal Audit Service acts on behalf of the GMCA Treasurer in ensuring these arrangements are reviewed and remain effective.

2.3 Whilst the principles within the policies apply, any concerns raised in relation to Members will be investigated and addressed through the GMCA Standards Committee.

3 Anti-Fraud Policy Framework

Anti-Fraud and Corruption Policy, Strategy and Procedures

3.1 The GMCA’s overall approach to protecting the public funds entrusted to it against fraud and loss is set out in its Anti-Fraud and Corruption Policy (Appendix 1). Included within the Constitution, the policy is reviewed and approved annually. The policy sets the tone, overall context and affirms a zero tolerance approach to fraud and corruption. It links to procedures setting out actions that will be taken should fraud or corruption be suspected or identified.

3.2 The Counter Fraud and Irregularity Strategy brings together the policy framework for preventing fraud and irregularity, describes the GMCA’s approach to countering fraud within each of the component areas (acknowledge, deter, prevent, investigate and pursue) and identifies the key priorities for delivering the Strategy.
3.3 The approach to delivering the Strategy include the implementation of key policy documents, namely Whistleblowing, Anti-Money Laundering and Anti-Bribery. These are summarised below:

- **Whistleblowing Policy**: Whistleblowing is one of the key means for identifying potential fraud, irregularity or wrongdoing. The policy emphasises that the GMCA has established arrangements to enable staff, stakeholders or the public to be able to raise matters of concern in relation to fraud, corruption, bribery or other wrongdoing. In adopting the policy and procedures such concerns will be raised with the GMCA Head of Audit and Risk Management in writing, through a whistleblowing hotline or in person. They will then be risk-assessed and appropriate actions taken to investigate the concerns. This could include referral to HR, Legal Services or the relevant constituent Local Authority.

- **Anti-Bribery Policy**: Refers specifically to the Bribery Act 2010 and Criminal Finances Act 2017, confirms that the GMCA will not tolerate either the giving or receiving of bribes or criminal facilitation of tax evasion and sets out the arrangements in place to prevent and detect these.


3.4 It should be noted that each District Council and TfGM have their own individual anti-fraud policies and arrangements, which reflect the principles and practices outlined in the GMCA policy, with the reporting of headline issues and referrals to the Authority’s Head of Audit and Risk Management.

4 **Current Position**

Policy Position

4.1 A summary of the current position and status with regard to each of the key Anti-Fraud and Corruption Policies is provided below:

<table>
<thead>
<tr>
<th>Document</th>
<th>Last Approved</th>
<th>Current Status / Date of Next Approval</th>
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<tbody>
<tr>
<td>Anti-Fraud and Corruption Policy</td>
<td>May 2018</td>
<td>To be reviewed in May 2019 and thereafter annually as part of the refresh of the Constitution.</td>
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<tr>
<td>Counter Fraud and Corruption Strategy</td>
<td>September 2016</td>
<td>Refresh of the Strategy currently on hold pending the appointment of the Head of Audit and Assurance for GMCA/TfGM. To be revisited during 2019/20.</td>
</tr>
<tr>
<td>Document</td>
<td>Last Approved</td>
<td>Current Status / Date of Next Approval</td>
</tr>
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<td>----------------------------------------</td>
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<tr>
<td>Whistleblowing Policy</td>
<td>July 2017</td>
<td>An independent desk based review of the policy has been undertaken by leading whistleblowing charity, Protect to ensure fitness for purpose. Content also refreshed to incorporate the introduction of GDPR. To be submitted to Audit Committee for approval in April 2019.</td>
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<tr>
<td>Anti-Money Laundering Policy</td>
<td>July 2017</td>
<td>Updated for the introduction of the GDPR. To be submitted to Audit Committee for approval in April 2019.</td>
</tr>
<tr>
<td>Anti-Bribery Policy</td>
<td>September 2016</td>
<td>Work currently underway to refresh the content and update where needed to reflect the introduction of the Criminal Finances Act (with regard to Criminal Facilitation of Tax Evasion) and GDPR. Draft document to be submitted to Audit Committee for approval in April 2019.</td>
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**Counter Fraud Training**

4.2 The Internal Audit Plan for 2018/19 included a number of days for the development of operational processes and training and awareness with regard to whistleblowing.

4.3 To assist with this Internal Audit, together with colleagues within Manchester City Council and Bolton Council procured a bespoke package of support from Protect (formally Public Concern at Work) an independent charity specialising in whistleblowing. To date the following has been completed:

- Attendance by officers within Counter Fraud at a whistleblowing training workshop.

- The provision of in-house training “Handling the Whistleblower”, for specialist teams including officers from Legal, HR and Internal Audit. This helped provide assurance over the appropriateness of arrangements in place to identify and address whistleblowing concerns.

- An independent desk based review of the GMCA’s Whistleblowing Policy has been undertaken, which confirmed the content of the policy is fit for purpose. Notwithstanding this a number of suggestions for improvement were made which are being considered prior to the document being submitted to Audit Committee Members for approval in April 2019.
• Introduction of a free independent, confidential advice line for use by employees and managers to support and advise individuals regarding concerns.

4.4 Utilising such services is a strengthening of the GMCA’s current arrangements and helps to demonstrate and embed an open, transparent and constructive culture within the organisation.

5 Next Steps

5.1 Revised and updated policies are to be submitted to Audit Committee for approval in April 2019 prior to being uploaded to the GMCA website.

5.2 Internal Audit will provide a briefing to members of Senior Management Team and Extended Leadership Team regarding the key points, roles and responsibilities in relation to fraud prevention activities.

6 Recommendation

6.1 Members of Standards Committee are asked to note the current position and planned steps to update and communicate the anti-fraud policies.
Appendix 1: Anti Fraud and Corruption Policy Statement

1.1 The Greater Manchester Combined Authority (GMCA) has a zero tolerance approach to fraud and illegal activity. This Anti Fraud and Corruption policy describes our overall approach to combating fraudulent activity against the GMCA and sits above related anti fraud policies and procedures which form part of the GMCA’s approach to managing the risk of fraud.

1.2 The GMCA is committed to ensuring that the people of Greater Manchester can have complete confidence that the affairs of the GMCA are conducted in accordance with the highest standards of probity and accountability. The GMCA is, consequently, committed to combating fraud and corruption wherever it may arise in relation to any of the GMCA’s activities and involving any Members or officers of the GMCA or members of the public or other third parties.

1.3 As is the case with all constituent Local Authorities, the GMCA expects Members and officers to demonstrate the highest standards of honesty and integrity in the conduct of their GMCA duties. This includes compliance with appropriate legislation, relevant Local Authority Member and Employee codes of conduct, GMCA Financial Regulations, standards of appropriate professional bodies, and any other standards, guidelines or instructions which are relevant to the particular activity.

1.4 The GMCA is committed to establishing and maintaining effective arrangements to prevent fraud and corruption. The GMCA recognises, however, that fraud and corruption cannot always be prevented and so effective arrangements have been established to detect and investigate all incidents or situations where fraud and corruption is suspected. These arrangements are contained within the detailed procedural guidance for the GMCA Statutory Officers employing authority which should be read in conjunction with this policy.

1.5 The GMCA Head of Audit and Risk Management will actively liaise with Heads of Internal Audit at constituent Local Authorities on matters of potential fraud or corruption relating to Local Authority budgets, staff or Members. This will help ensure that the GMCA and relevant Local Authority work together in the assessment, evaluation, investigation and reporting of matters of potential fraud and corruption.

1.6 The GMCA will not tolerate dishonesty on the part of any of the members or officers of the GMCA or any persons or organisations involved in any way with the GMCA. Where fraud or corruption is detected the GMCA will work with constituent Local Authorities to rigorously pursue appropriate action against the persons concerned including legal and / or disciplinary action, including dismissal.

1.7 The GMCA is committed to creating and maintaining an anti fraud and corruption culture and this includes establishing arrangements which enable employees, or other persons, to express concerns and suspicions without fear or repercussions or intimidation and in the knowledge that the information will be treated confidentially and will be investigated fully and rigorously.
1.8 The GMCA is committed to working constructively with the police and other relevant agencies in relation to combating fraud or corruption within the GMCA or within the wider community.

1.9 The GMCA will seek to ensure that the stance on anti-fraud and corruption is widely publicised. All employees and members of the GMCA and Heads of Internal Audit at constituent Local Authorities will be made aware of this policy.
GMCA – Standards Committee

Date: 12 February 2019

Subject: Review of GMCA Complaints Procedure and Adoption of Policy on the Management of Unreasonable Complainant Behaviour

Report of: GMCA Monitoring Officer

PURPOSE OF REPORT

To inform the Standards Committee of the Review of the GMCA’s Complaints Procedure which now includes both Waste & Resources and Fire & Rescue functions.

To endorse the adoption of a Policy on the Management of Unreasonable Complainant Behaviour.

A revised Complaints Procedure and a policy on the Management of Unreasonable Complainant Behaviour are attached for the Committee’s consideration.

RECOMMENDATIONS:

The Committee is recommended to consider the report and note the revised Complaints Procedure and endorse the adoption of a Policy on the Management of Unreasonable Complainant Behaviour.

CONTACT OFFICERS:

Name: Liz Treacy
Position: Monitoring Officer, GMCA
E-mail: l.treacy@greatermanchester-ca.gov.uk

Name: Gwynne Williams
Position: Deputy Monitoring Officer, GMCA
Telephone: 0161 608 4007
E-mail: williamsg@manchesterfire.gov.uk
Risk Management – the Complaints Procedure forms part of GMCA’s corporate governance arrangements
Legal Considerations – legal requirements are referred to throughout the Complaints Procedure
Financial Consequences – none
Financial Consequences – none

**BACKGROUND PAPERS:**

GMCA Complaints Procedure

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1. INTRODUCTION

1.1. The GMCA is committed to providing high quality services to the public.

1.2. In the event that the public is dissatisfied with a service provided by the GMCA, the GMCA is committed to ensuring that there are effective arrangements in place to report, investigate and resolve complaints.

2. BACKGROUND

2.1. The functions of the GMCA have changed significantly since 2017 through a number of statutory Orders. In particular, the GMCA has taken on statutory responsibility for some frontline services to the public.

2.2. In May 2017, the functions of the former Greater Manchester Fire and Rescue Authority transferred to the GMCA and are exercisable by the GM Mayor. The GMCA has therefore statutory responsibility for the provision of fire and rescue services in Greater Manchester.

2.3. In April 2018, the functions of the former Greater Manchester Waste Disposal Authority transferred to the GMCA. The GMCA has responsibility for the management and disposal of municipal waste from the metropolitan districts of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside and Trafford. The GMCA discharges these functions through a network of waste management facilities in Greater Manchester operated by a waste contractor.

3. COMPLAINTS PROCEDURE

3.1. The GMCA’s existing complaints procedure has been reviewed as part of its governance arrangements.

3.2. The policy has been amended to incorporate the procedure for complaints arising out of fire and rescue service delivery and waste facilities operated by the waste contractor.

3.3. In the case of waste complaints, it is recognised that the waste contractor has a role in the resolution of complaints and will ordinarily undertake stage 1 (informal) and stage 2 (formal).

3.4. In the case of fire and rescue, complaints about the standard of service, conduct of staff or acts or omissions of the fire and rescue service will continue ordinarily to be undertaken within the Fire and Rescue function.

3.5. The revised complaints procedure is attached for the Committee’s consideration.

4. MANAGEMENT OF UNREASONABLE COMPLAINANT BEHAVIOUR
4.1. The GMCA is committed to dealing with all complaints in an open, fair and proportionate manner. However, in a small number of cases individuals may pursue their complaints in a way that is unreasonable.

4.2. A policy on the Management of Unreasonable Complainant Behaviour has been drafted in line with Guidance produced by the Local Government and Social Care Ombudsman.

4.3. The policy contains examples of what constitutes unreasonable behaviour and the process for dealing with such behaviour.

4.4. The Committee is requested to consider the attached policy and endorse its adoption.
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We aim to provide high-quality services for all members of the public. We accept that things can sometimes go wrong and we need to know when you are not happy with our service.

When you tell us what you are not happy with, we can try to put things right. In future, we can try to get it right first time. We will treat your complaint seriously and deal with your complaint positively. We see any complaints as an opportunity to improve the way we do things.

Our aims

We are committed to putting you first and providing quality customer service. This includes dealing with any complaint you may have.

• We will deal with your complaint quickly and fairly.
• We will tell you what is happening with your complaint and we will do everything we can to help you.
• We will do our best to treat the information you give us in confidence.
• We will explain our decision.
• We will use complaints to review and improve the way we provide services.
• If you make a complaint, it will not affect your rights to receive or use Combined Authority service.

How do I make a complaint?

Before submitting a complaint to the Greater Manchester Combined Authority (GMCA) you should ensure that you have raised the complaint with the correct organisation. The Greater Manchester Combined Authority has not replaced existing local authorities, individual councils of Greater Manchester’s ten districts deliver the vast majority of services for your community. Also, the GMCA has not replaced companies and organisations providing and managing public transport in Greater Manchester.

If you make a complaint to us that does not directly relate to an activity carried out by the Greater Manchester Combined Authority we will advise which organisation you should make your complaint to. If you have emailed or written to us we will pass your complaint onto the right organisation and let you know we have done this.

Transport Complaints

If you have a complaint about any transport-related matter Transport for Greater Manchester’s Customer Engagement Team will be pleased to help. They can be contacted on: customer.relations@tfgm.com or via social media using @OfficialTfGM. The team will make sure that any comments or complaints are logged and responded to or passed to the relevant third party operator (for example a bus company) so they can directly respond to the complainant. Further information can be found online at www.tfgm.com
Complaints about Metrolink can be directed to customerservices@metrolink.co.uk or via social media using @MCRMetrolink. Further information can be found online at www.metrolink.co.uk

If you have been through the complaints procedure of the appropriate transport provider and you are unhappy with the response provided you may wish to escalate your complaint to Transport for Greater Manchester’s (customer.relations@tfgm.com) who will work with the operator to resolve the issue.

You can also escalate your complaint to Transport Focus, whose contact details and complaint handling process can be found online at www.transportfocus.org.uk

Waste and Resource Complaints from Greater Manchester Waste Facilities

If you have a complaint about a waste site in Greater Manchester the Waste and Resources Team will be happy to help. The team will make sure that any comments or complaints are recorded and responded to or passed to the operating waste contractor (a private company who operates waste facilities on behalf of the Greater Manchester Combined Authority) so they can directly respond to the complainant.

- ContractManagervwgm@viridor.co.uk

If you have been through the complaints procedure of the appropriate waste company and you are unhappy with the response provided you may wish to escalate your complaint to the Waste and Resource Team who will work with the waste contractor to resolve the issue.

- GMWaste@greatermanchester-ca.gov.uk
- 0161 778 7110

Greater Manchester Local Enterprise Partnership

If you have a complaint about Greater Manchester Local Enterprise Partnership then you should can email us on enquiries@greatermanchester-ca.gov.uk, ring us on 0161 778 7000, or write to:

Complaints, The Greater Manchester Local Enterprise Partnership c/o Head of Greater Manchester Integrated Support Team P.O. Box 532 Town Hall Manchester M60 2LA

The Greater Manchester Local Enterprise Partnership follows the same complaints procedure as the Greater Manchester Combined Authority.

Greater Manchester Fire and Rescue Service

Greater Manchester Fire and Rescue Service is fully committed to providing the highest possible levels of service to the public of Greater Manchester. Your comments and complaints
will help us to identify areas for improvement in our service delivery and result in a better and more responsive service.

Please get in touch via email: complaints@manchesterfire.gov.uk

Or, alternatively, by phone on 0161 608 4352, or by post:

Complaints Greater Manchester Fire and Rescue Service  
146 Bolton Road  
Swinton  
Manchester  
M27 8US

How the Greater Manchester Combined Authority Deals with Complaints

We want to make sure that when you tell us that you are not happy with something your complaint is dealt with fairly and sorted out as quickly as possible. We have tried to make our complaints process as straightforward as possible, which is set out below.

Step One - Informal Complaint

Where possible, an officer of the GMCA will do their best to help resolve the issue for you. You can contact us on enquiries@greatermanchester-ca.gov.uk or ring us on 0161 778 7000, or write to:

c/o Assistant Director - Governance and Scrutiny  
GMCA  
Churchgate House  
56 Oxford Street  
Manchester M1 6EU

When you contact us, please give us your name and address - including your postcode - and your phone number. If you prefer, you can ask a friend or relative to speak or write to us for you.

If you are not happy with the outcome of this you can go through a formal complaints procedure which is outlined below.

Step Two - Formal Complaint

If the officer have not been able to help put things right, or you are not happy with the result, the next step is for you to make a formal complaint. At this stage, we need all the details of your complaint in writing. You can email us at enquiries@greatermanchester-ca.gov.uk or write to us at:
Your complaint will be handled by a senior manager in the team you're complaining about.

For all complaints we will:
• Let you know that your complaint has been received within 3 working days.
• Provide you with a full response within 20 working days, or explain why it might take longer.
• Give you details of who has investigated your complaint and their decision on it.
• Advise you on how to take your complaint further if you are still unhappy with the result.

Step 3 - Complaint Review

If you have been through Steps 1 and 2 of the complaints procedure and you are still not happy with the results of the investigations, you can ask the GMCA’s monitoring officer to review your complaint. Please do this within 10 working days of receiving the outcome of your complaint.

The GMCA’s Monitoring Officer will write to you within three working days to let you know:
• that they are reviewing your complaint;
• approximately how long it will take us to carry out the review; and
  when they will send out a written reply.

We aim to complete a complaints review within 25 working days.

Dealing with Repeating Complaints

We are committed to dealing with all complaints fairly and impartially, and to providing a high quality service to those who make them. However, there are occasions when contact from a complainant becomes too frequent or complex that it hinders our consideration of their complaints, or those made by other people. We refer to such complainants as either vexatious or unreasonably persistent, and in such cases we may take action to limit the contact the complainant has with us. Such occurrences are rare, and we will first write to the complainant to advise that their contact is no longer considered reasonable. Further information can be found in our vexatious complaints policy.

If you'd like to take things further – Local Government and Social Care Ombudsman

We really hope we are able to resolve any complaints you might have. If however, you are unhappy with the action we have taken, you may want to contact the Local Government and Social Care Ombudsman.
You can contact the Local Government and Social Care Ombudsman about your complaint at any time. However, the Ombudsman usually gives the Combined Authority the opportunity to investigate first.

You can contact the Local Government and Social Care Ombudsman at:

Local Government and Social Care Ombudsman
PO Box 4771
Coventry CV4 OEH
Phone: 0300 061 0614
Text: ‘call back’ to 0762 480 3014
Website: www.lgo.org.uk

You can get leaflets about how to complain to the Local Government and Social Care Ombudsman from any of Council’s offices or any library.

Is there anyone else who can help?

Apart from asking for help from a friend or relative, you can contact an independent person or organisation, for example:

- your local councillor
- your MP
- Citizen’s Advice Bureau

If you know your Ward name of the Council area you live in go to its web site and search for your Councillor. Find out who your MP is click here. Visit the Citizen’s Advice Bureau website for information about their services.

You can contact your councillor at any time about your complaint. The councillor will normally ask the senior manager dealing with your complaint to provide details of why you complained and what they have done to put things right.

Comments and suggestions

As well as learning from complaints, we want to know any comments or suggestions you may have that will help us improve our services. You can do this by telling a member of staff about your comment or suggestion or by putting your comment or suggestion in writing. You can contact us by sending an email to enquiries@greatermanchester-ca.gov.uk or writing to us at Use this form to make a comment or suggestion about our website.

Frequently Asked Questions

I’m worried that if I complain, the service I receive will be affected
Definitely not. We always aim to provide the best possible service to all our customers, and we will not change that just because we are investigating your complaint.

Is the information I give you confidential?
Any information you give us is covered by Data Protection guidelines. This means that we - will keep personal data safe and secure; will not share it with other organisations without your permission, unless the law says we must; and may use it to prevent and detect fraud.

I want to make a complaint, but want to stay anonymous - will you still look into it? Yes. While it is helpful to us to know who you are so we can get in touch with you for extra details, we believe everyone has a right to complain. As a result we will investigate anonymous complaints thoroughly.

note
Policy on the Management of Unreasonable Complainant Behaviour

CONTENTS

1 Introduction
2 Policy aims and principles
3 Definition of unreasonable complainant behaviour
4 Examples of unreasonable complainant behaviour
5 Procedure for invoking this policy
6 Options for action
7 Further action

1. Introduction

The Greater Manchester Combined Authority (‘GMCA’) is committed to dealing with all complaints in an open, fair and proportionate manner and we endeavour to provide a high quality service to those who make them. GMCA has an established policy for dealing with complaints.

However, we recognise that in some cases individuals may pursue their complaints in a way that is unreasonable. Although these cases represent a small number of overall complaints, they can cause considerable disruption for staff\(^1\), generate a disproportionate amount of additional work and can sometimes impact upon the wellbeing of our staff. This policy describes the type of complainant behaviour which may be considered to be unreasonable and GMCA’s approach when responding to such behaviour.

This policy has been drafted with reference to the Local Government and Social Care Ombudsman’s “Guidance note on management of unreasonable complainant behaviour” (July 2014).

\(^1\) For the purposes of this policy the term ‘staff’ includes officers and members of GMCA.
2. **Policy aims and principles**

This policy is governed by the following principals –

- All complainants will be treated fairly and with respect.
- All complaints will be considered on their merits.
- Unreasonable complainant behaviour does not preclude there being a valid issue.
- The substance of a complaint will dictate the level of resources dedicated to it, rather than a complainant’s demands or behaviour.
- Staff safety and wellbeing is paramount when dealing with unreasonable complainant behaviour.
- The decision to change or restrict a complainant’s access to services as a result of their behaviour will only be made at a senior management level and in accordance with clearly defined policies and procedures.
- Senior managers will ensure relevant systems, policies and procedures are in place to manage complaints and that all staff who interact with complainants will receive training, guidance and direction about managing unreasonable behaviour.

This policy aims to describe -

- the type of behaviour which falls within the scope of this policy;
- the process for making a decision to invoke the policy, which is consistent, transparent and reasonable;
- the type of action which may be taken by GMCA in response to unreasonable complainant behaviour.

3. **Definition of ‘unreasonable complainant behaviour’**

This policy covers ‘unreasonable complainant behaviour’ which may include one or two isolated incidents as well as ‘unreasonably persistent behaviour’ which more usually involves a build-up of behaviour or incidents over a longer period of time.

For GMCA’s purposes ‘unreasonable complainant behaviour’ is behaviour of a person which, because of its nature or frequency –

- hinders GMCA’s consideration of that person’s complaint, or other people’s complaints: and/or which
- adversely affects GMCA’s ability to do its work and provide services to others.

4. **Examples of unreasonable complainant behaviour**

Some examples of behaviour which may fall within the scope of this policy are set out below. This is not an exhaustive list:

- Refusing to specify the grounds of a complaint, despite offers of help;
- Refusing to co-operate with the complaints investigation process;
- Refusing to accept that issues are not within the remit of a complaints procedure despite having been provided with information about the procedure’s scope;
- Insisting on the complaint being dealt with in ways that are incompatible with the adopted complaints procedure or with good practice;
- Making unjustified complaints about the staff who are trying to deal with the issues and seeking to have them replaced;
- Changing the basis of the complaint as the investigation proceeds and/or denying statements he or she made at an earlier stage;
- Introducing trivial or irrelevant new information at a later stage which the complainant expects to be taken into account and commented on,
- Raising many detailed but unimportant questions and insisting they are all answered;
- Electronically recording meetings and conversations without the prior knowledge and consent of the other persons involved;
- Adopting a 'scatter gun' approach: pursuing parallel complaints on the same issue with GMCA and various other organisations, for example with a Member of Parliament/a councillor/GMCA’s independent auditor/the Standards Board/local police/solicitors/the Local Government and Social Care Ombudsman.
- Making excessive demands on the time and resources of staff with lengthy or excessive phone calls, emails to numerous GMCA staff, generating detailed letters every few days and expecting immediate responses;
- Submitting repeat complaints, with minor additions/variations the complainant insists make these 'new' complaints;
- Refusing to accept the decision – repeatedly arguing the points with no new evidence and complaining about the decision (particularly when there remains scope for the complainant to escalate the complaint to the next formal stage e.g. the Local Government and Social Care Ombudsman);
- Making a complaint which in GMCA’s reasonable opinion is unfounded, unreasonable or trivial and/or is made with the intention of wasting GMCA officer time and resources and/or prevents GMCA from carrying out its business, or harasses GMCA staff, or which is otherwise made in bad faith.

In addition to the above, GMCA does not expect staff to tolerate behaviour which is abusive, offensive or threatening and may include:

- Using abusive, offensive or foul language on the telephone or in writing (including emails and social media);
- Using abusive or foul language face to face;
- Sending multiple emails to one member of staff;
- Leaving multiple voicemails for one member of staff;
- Making direct threats;
- Directly verbally insulting staff or making derogatory comments about them.
Staff should also consider other contact with GMCA, such as through Freedom of Information Act requests, when considering whether to treat complainant behaviour as unreasonable.

5. Procedure for invoking this policy

Before taking any action under this policy, staff must ensure that any complaint is being or has been investigated properly, that communications with the complainant have been adequate and that the complainant is not now providing any significant new information that might affect the organisation's view on the complaint.

Stage 1 – issuing a warning

If staff consider that the behaviour of a complainant falls within the scope of this policy they should notify the Head of the service associated with the complaint, describing and providing sufficient examples of the behaviour concerned, why it is considered to be unreasonable and why they consider that the policy should be invoked. Emails and correspondence may be provided to the Head of the service as further evidence.

The Head of the service associated with the complaint will then consult with the Monitoring Officer of GMCA before deciding whether to issue a written warning to the complainant. Any written warning that is issued must explain why the complainant's behaviour is considered to be unreasonable and will request that he/she change this behaviour. The complainant should also be warned that this policy will be invoked should the unreasonable behaviour continue. A copy of this policy should be included with the written warning.

If the behaviour of the complainant is so extreme or it threatens the immediate safety and welfare of staff the Head of the service associated with the complaint may proceed directly to Stage 2 without issuing a written warning. Alternatively GMCA may consider other options including police involvement or legal action and in such cases GMCA does not need to issue a written warning to the complainant.

Stage 2 – taking action

If a complainant continues to behave unreasonably following receipt of a written warning, the Head of the service area associated with the complaint, in consultation with the Monitoring Officer of GMCA, will decide what action to take to manage the unreasonable behaviour.

Any action taken should be proportionate to the nature and frequency of the complainant’s current contacts. The following options may be suitable, taking the complainant’s behaviour and circumstances into account:

- Placing limits on the number and duration of contacts with staff per week or month;
- Offering a restricted time slot for necessary calls;
- Limiting the complainant to one medium of contact (for example telephone, letter, email etc.);
• Requiring the complainant to communicate only with a named member of staff;
• Requiring any personal contacts to take place in the presence of a witness and in a suitable location;
• Requiring the complainant to enter into an agreement about their future behaviour before their case proceeds;
• Where a decision on the complaint has been made, telling the complainant that future correspondence will be read by a designated person and placed on file but not acknowledged, unless it contains material new information.

The above list is not exhaustive. Other suitable options may also be considered in light of the complainant’s circumstances.

If a decision has been made to apply restrictions to the complainant’s contact with GMCA staff, the Head of the service area associated with the complaint will write to the complainant to explain why the decision has been taken, what it means for his or her contact with GMCA, how long any restrictions will last and/or when they will be reviewed, and the right of the complainant to refer the matter to the Local Government and Social Care Ombudsman.

If, in addition to any regulation of access, a decision is taken not to pursue the complaint under the Complaints Policy, this must also be put in writing to the complainant along with the reasons for the decision.

New complaints from individuals who have are subject to action under this policy will be treated on their merits.

6. Further action

If the complainant fails to adhere to any conditions regulating his/her contact with GMCA and/or uses or threatens violence against staff, then the matter should be referred to the GMCA Monitoring Officer for advice as to the most appropriate and proportionate action to be taken, which may include civil or criminal legal proceedings (e.g. ASBO and/or injunction proceedings).
GMCA Standards Committee  
Work Programme 2019-20

**This is a working document, and subject to change.**

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<td>Review the Anti-Fraud and Corruption Policy</td>
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<td>Review the GMCA Whistle Blowing Policy</td>
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Policies which are within the remit of the GMCA Standards Committee

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