

Paragraph 3.10 of the Monitoring Officers report explains that a complaint against a Councillor more than 6 months old will not be investigated.

This clause was introduced at a meeting of this Committee on the 20th September 2018. The Minutes state, "The Monitoring Officer, as requested by the Standards Committee". The Council have been unable to provide any evidence that members of said Committee made any such request to the Monitoring Officer, (now former Officer).

Two months before that Committee meeting, on the 19th July, the Monitoring Officer was given a dossier of evidence that between 2011 and 2018, excluding 2017, the University of Bath sent 418 individual invitations to Councillors, some Senior Council Officers, and Council CEOs, to an annual dinner, each dinner with a budget of £15,000, £105,000 in total.

Not one Councillor or Officer who attended, declared the receipt of hospitality. Between 2013 and 2018 the Dinners exceeded £50 per head, whereby a Declaration was a requirement of the Code.

The Monitoring Officer received a complaint for *each* undeclared Dinner. Complaints outside of six months, were recorded as "No Breach, No Further Action",

It appears that the Monitoring Officer, on their own initiative, introduced a change to the Code of Conduct, and apparently with the agreement of the Independent Person and the Chair of the Committee, considered all of the complaints against the revised Code that was not in force at the time of breach.

This Monitoring Officer explains in paragraph 3.6 of the Report, that failure to record Disclosable Pecuniary Interests (DPI) could give rise to a potential criminal offence and *must* be communicated to the Police in compliance with the Protocol agreed between this Council and Avon and Somerset Constabulary.

The Police have reviewed their records and confirm that complaint 08-20, relating to a failure to register multiple DPis was not referred to the Police. It appears the Protocol is not being applied correctly. The Chair and Independent Person were consulted regarding 08-20.

Press reports explained that a Councillor had accepted 23 free tickets for Bath Rugby matches in 25 months. The Councillor explained that he has always been transparent in declaring interests, the Councillor has previously stated that he will not take part in planning considerations related to Bath Rugby, That Councillor has been re-elected to the Council following a break of one term, That Councillor currently sits on the Planning Committee which may soon consider an application from Bath Rugby. but under current regulations the Councillor is allowed to be a member of the Planning Committee, consider any application, while having no obligation to declare any gifts and hospitality from previous years, and not have done anything wrong.