

**Senior Management Team
Monthly Meeting Minutes
13.30 on Thursday, 20 February 2025**

ATTENDING

Ian Bruce, Ethical Standards Commissioner (Commissioner)
Karen Elder, Head of Corporate Services, (HCS)
Sarah Pollock, Hearings and Investigations Officer (HIO)
Melanie Stronach, Public Appointments Manager (PAM)

IN ATTENDANCE

Nikolas Thomsen, Corporate Support Officer (CSO)

APOLOGIES

Angela Glen, Senior Investigating Officer (SIO)

1. Welcome and Introduction

a. Items for consideration in private

- The meeting agreed to take one item in private.

2. Previous Minutes

a. Approval

- Previous minutes agreed.

b. Matters arising

- i. Work to develop a succession planning policy is underway. The Human Resources and Facilities Officer (HRFO) outlined the initial approach and process to HCS; further development and consultation with the Commissioner is required prior to issuing a draft to SMT.
[Ongoing. Commissioner and HRFO agreed direction; project plan developed and draft Workforce Resilience Plan underway.](#)

3. Governance and providing assurance

a. Stakeholder engagement – key events

- 4 December – Public Appointment Advisers (PAA) Communications day (including invitation to the Scottish Government Public Appointments Team (SG PAT) and wider ESC to hear guest speaker on Artificial Intelligence in recruitment).
- 16 December – Commissioner, SIO and HIO met with the Chair, Members and staff of the Standards Commission Scotland (SCS) to discuss issues of mutual interest. This was the final biannual meeting of the year.
- 16 December – Commissioner met with his fellow parliamentary officeholders to discuss issues of mutual interest, including the shared services agenda.

- 17 December – Commissioner met with the Chair of the NHS Chairs group to discuss the regulated appointments process.
- 14 January – HRFO attends Officeholders Shared Service Network (OSSN) meeting
- 16 January – Commissioner gave evidence on the work of the office to the Standards, Procedures and Public Appointments (SPPA) Committee.
- 16 January – PAA Communication half-day relating to diversity strategy.
- 30 January – HCS attends DPO meeting.
- 30 January – Commissioner gave evidence to Scottish Parliament Corporate Body (SPCB) Supported Bodies Landscape Review Committee.
- 17 February – Commissioner attended a Scottish Government Public Sector Reform Summit.
- Further events contained in monthly reports of [Corporate](#), [Standards](#), and [Public Appointment Team](#).

b. [Business plans](#)

- Progress with key actions:
 - Corporate Services Team (CST): Work on accommodation and workforce plan underway. Items to focus on next are the CST desk instructions, CST Scheme of Delegation (SoD), further development of Communications Strategy actions and review of processes used to manage training.
 - Public Appointments Team (PAT): All deadlines for actions in the current financial year are due to be met. Interim reviews complete, first thematic review underway, good practice case study published in December and the Diversity project is well underway.
 - Standards Team: Significant progress has been made on managing an effective case management system and reducing waiting times. Five new Easy Read guides on our complaint handling functions have been published on our website. Stakeholder engagement continues to improve through various external events. As active queue management has taken a substantial priority, some focus on actions such as the development of a Boston Matrix to support stakeholder engagement and the rollout of some further aspects of the QA Framework will now be prioritised early in the next financial year.
- Progress against Biennial Business Plan will be discussed in depth at next SMT meeting.

c. [Managing risk](#)

- Emerging risks
 - None were raised, existing risks still relevant.
 - The Commissioner noted that increased media focus on the gender recognition reform debate may impact complaint trends.

d. [Advisory Audit Board \(AAB\)](#)

- The AAB is meeting on 26 February. The meeting will discuss internal audit reports and progress with recommendations, internal and external audit plans for 2025/26, strategic risks and the annual report on data protection matters.

e. [External audit](#)

- Audit Scotland has issued its draft audit plan for 2024/25. The plan will focus on our financial sustainability, a review of our governance statement and the operation of the Commissioner's investigations manual and quality review arrangements.

- The draft annual report and accounts are to be submitted to Audit Scotland by the end of July, with fieldwork in August and finalised draft by 17 September. The AAB sign off meeting will be held on 24 September.
- The HCS is currently reviewing the format of the ARA to reduce its size and remove duplication. A draft will be circulated in March.

f. Internal audit

- Update on outcomes and plans for 2025/26 and 2026/27
 - The final two audits for 2025/26 have been completed.
 - The review of our Business Continuity arrangements offered substantial assurance with one medium and one low level recommendation. The medium recommendation is to undertake a tabletop exercise testing these arrangements. The HCS is aware that this work has been delayed and aims to complete this in 2025.
 - The follow-up review considered 10 active recommendations. The preliminary conclusion found strong assurance with five recommendations completed, four partially complete and one superseded.
 - The HCS has circulated initial ideas for internal audit work over the next two years. The meeting discussed and considered the following options: Investigations manual, Budgeting process, Communications strategy, FOISA processes, and records management. The Commissioner also flagged that a review of performance management systems and key governance areas might be useful.
 - The HCS will provide an update to the internal auditor to finalise the draft audit plan.

g. Policy Review

- For detail on policies finalised, under review, or upcoming, see item 3 in the [Corporate Monthly Report](#)
- Policies finalised during period
 - Four financial procedures were updated, and the Unacceptable Behaviour Register was revised.
- Policies under review or staff consultation
 - The Business Continuity Plan and British Sign Language Plan (BSL) have been updated and circulated to the SMT for comment. Job description and workforce resilience project plans have also been circulated to the SMT for input. A preliminary review of all Privacy Notices and the Privacy Policy has been completed, and relevant staff members were contacted for input. A revised Unacceptable Behaviour Policy has been drafted and will be circulated to the SMT for comment.
- Upcoming policy reviews
 - Reviews of the File Plan and Retention Schedule and Annual Financial and Business Planning Procedures are outstanding. Reviews of the Display Screen Equipment (DSE) policy, SMT Terms of Reference and finalisation of CST Scheme of Delegation are to follow. Updates to the Training and Grading Policies, Investigations Manual, Witness Policy and Guidance, and Guide to Information are scheduled for April 2025.

h. Complaints about us

- Complaints received since last meeting
 - None received, closed or outstanding.
- Outcomes
 - N/A

- Time taken to close
 - N/A
- Days taken
 - N/A
- i. **Consultations received**
 - Two consultations received; one response issued with none outstanding. The Commissioner responded to the House of Commons Committee on Standards call for information on the regulation of MPs outside interests and employment.
- j. **Unacceptable Behaviour Policy actions**
 - None implemented and none were scheduled for review.

Actions:

- i. Commissioner to discuss with HRFO and HCS about proposing to the OSSN an Officeholder portal to make our services more accessible.
- ii. HCS to circulate revised format annual report and accounts to Audit Scotland and SMT.
- iii. HCS to provide an update to the internal auditor to finalise the draft audit plan.
- iv. HCS to circulate revised Unacceptable Behaviour Policy and Privacy Policy and relevant Privacy Notices to SMT.

4. Operational matters

a. Key points for SMT information and consideration

- Business Continuity Plan
 - The HCS circulated a draft of the revised plan in advance of the meeting and SMT members have submitted comments. The meeting agreed to amend the review frequency from three to two years and clarified the order of contact if office accommodation became unavailable or when contacting PAAs. The revised plan was agreed. The HIO suggested that the document is pinned to the landing page of the SharePoint site. The meeting agreed.
- [BSL Plan](#) and [translation script](#) (links to internal ESC documents)
 - The PAO introduced the revised BSL plan and BSL script for the consultation and thanked all SMT members for their helpful reviews of the proposed content.
 - The HCS raised concerns over quoting legislation and avoiding the use of “our services” across our communications. The Commissioner was content that we use “our services” where appropriate when communicating with the public. The meeting agreed to reduce quoting legislation to improve accessibility.
 - The HIO questioned the possibility of the Accessibility Working Group (AWG) having a role in reporting progress with actions. The meeting discussed and agreed to an annual update with input from the AWG at an SMT meeting.
 - The PAO shared her work on developing an ESC bank of images for Easy Read use. This means we now have a bank of images specific to our organisation and functions which can be used consistently across all of our Easy Read publications. The Commissioner noted the potential for sharing this bank with the Officeholders Shared Services Network (OSSN) to support similar organisations and to improve consistency and accessibility of Easy Read across all the officeholders.
- Changing bank account

- A business case for moving to RBS's Bankline had been circulated in advance of the meeting. The HIO raised concerns regarding the short timeframe for the SG Framework agreement and the impact this may have on costs after July 2026. The meeting discussed the risks associated with the move and agreed to proceed with implementing the change in bank account.
- Schedule for data audit and Data Protection Impact Assessments (DPIAs)
 - The HCS advised that two prior year internal audit recommendations are still to be fully completed and will need input across the organisation. One recommendation is to update the data register which records where all personal data is held and why. The CST have developed templates and identified the range of systems we use and have begun work on a detailed assessment of corporate records. This project will ultimately require input from the other teams with regard to their own data. The HCS described the process and advised that work will be required across the office. Similarly, we have made progress with the recommendation to complete or update DPIAs for all the systems where we store or use personal data. We will need ongoing input from other teams, but this will be less resource intensive.

Actions:

- i. HCS to arrange publication of revised Business Continuity Plan
- ii. IMITO (Information Management and IT Officer) to add Business Continuity plan to the landing page of SharePoint.
- iii. PAO to liaise with BSL contact to identify how the plan and translation script could be more accessible.
- iv. HCS to introduce annual updates from the AWG at SMT meetings on the progress of the AWG action plan.
- v. PAO to further develop ESC Easy Read image bank and investigate sharing access to OSSN.
- vi. CSO to investigate copyright issues with Canva images.
- vii. HCS to consider Easy Read/Videographic instructions for FOI requests.
- viii. SMT to consider Easy Read training for staff members provided by PAO.
- ix. HCS to proceed with move to Bankline.
- x. HCS to provide SMT with details on data audit work

5. Operating an effective complaints system

a. Key points for SMT information and consideration

- Case volume and workflow
 - Statistics contained in [Standards Monthly Report](#).
 - Significant progress has been made on reducing waiting times and backlogs of cases at all stages.
 - The number of cases at new/admissibility have been significantly lowered following the strategic decision to allocate more resources to the initial stages of an investigation, allowing a quicker assessment of complaints before they are either closed or accepted for investigation. As a result, the largest concentration of cases now falls within the investigation stage. This stage encompasses cases at all varying points in the process, from evidence gathering and interviewing to the finalisation of reports. While the overall number of cases remains significantly higher than at any other stage in the process, their staggered progression ensures we maintain a constant and manageable flow of referrals to SCS.

- The Standards team is currently allocating complaints about councillors and members up to the end of January 2025 and is up to date for complaints against MSPs.
- The Commissioner congratulated the efforts of the standards team for making substantial progress during this period and for the innovative procedural changes that have improved overall case workflow.
- The Commissioner and SIO presented at three hearings during this period. One was held on 10 December for a North Lanarkshire Councillor, the second was held on 15 January for a Midlothian councillor and the third was held on 4 February for an Aberdeen City Councillor.
- Additional measures to reduce waiting times and their impact
 - The significant reduction in the number of cases sitting at both New and Admissibility is a result of a number of measures put into place over the last 4 months.
 - In addition, both the HIO and SIO are prioritising Stage 1 assessments for all outstanding complaints received in the previous three months period, up. Therefore, for an initial period, there will be two processes running in parallel to minimise delays, manage the queue more efficiently and ensure complaints move through the system more effectively. This will continue to operate until at least the end of March 2025. The [Standards report](#) details the benefits to this process.
 - The Standards Team has successfully introduced the Duty IO role and has received positive feedback after a complete rotation of all participating team members. This new role has made a significant contribution in reducing stage 1 waiting times as there is now no delay in contacting Complainers to seek further information where required. This allows for a timely handover of relevant case material to an IO upon assignment. The [Standards report](#) details the full role and responsibilities of the Duty IO.
- Easy Read
 - A number of Easy Read publications have now been developed covering various stages in the complaints process and are available on the website. The HIO thanked the PAO for her guidance and for the input from the Senior Investigations Support Officer and Investigations Support Officer.

6. Regulating appointments to boards

a. Key points for SMT information and consideration

- Current volume and statistics are contained in [Public Appointments Monthly Report](#).
- Diversity Strategy project update
 - Initial research is underway and includes quantitative and qualitative research. Consultation surveys are now open and are seeking views from special interest groups and those who do not currently hold a Public Appointment.
 - An approach was made to Cab Sec with responsibility for Public Appointments to support the project, but no response has been received.
 - The Commissioner updated the SPPA Committee at the session on his Annual Report and sought support from the Committee to seek cross party views.

- A half day comms session was held with the PAA's in January for them to provide their views on the current "state of the nation".
- The first micro report on the research to date has been received from Leading Kind and the first steering group has been arranged.
- Time commitment project
 - The survey is now open and seeking views. The closing date was extended to 14th Feb to allow additional responses as initially the response rate was quite low.
 - Around 60% of board chairs have completed the survey but member responses remain fairly low. Focus groups and individual interviews are being arranged and are planned to take place in February/March.
- Working with Scottish Government
 - Continued challenges – 19 concerns were reported about appointment rounds up to end of September, 40 at the end of November and currently 59 at the end of January.
 - SG PAT has experienced substantial staff turnover. The Head of SG PAT left their post in mid-November, the next immediate line manager left their post in January, and another longstanding member of the team has left in February. This has placed substantial pressure on their team. It has however been confirmed that the replacement for the Head of PAT has been sourced and will start at the beginning of March.
- Appointment rounds of concern – *For consideration in private*
 - Item discussed in private.

7. Upcoming training

a. Staff training schedule

- Newsletter reminder – Absence Policy and Archiving Procedures
- Line manager 1-2-1 reminders – Mental Health & Wellbeing
- Next online team meeting
 - The SMT agreed to omit the February team meeting as the Quarterly Team Meeting share similar dates. CSO to circulate February SMT meeting minutes to staff instead.
- Factsheet – Code of Conduct has been issued, and Records Management is currently on hold.
- External training – None
- ESC Led – NCSC Modules reminder

b. Quarterly Team Meeting

- The HCS circulated format details to the SMT in advance of the meeting. The next QTM will be held in Thistle House on Wednesday, 5 March. There will be a working lunch followed by an afternoon training session. The training session will consist of:
 - Team presentations on successes in 2024/25.
 - Cross-functional break-out sessions focusing on a live issue for each team.
 - Results of the accommodation survey and further input.
 - Commissioner update on Landscape Review Committee and budget.

Actions:

- i. CSO to circulate February SMT meeting minutes to staff.

8. AOB

- Significant FOI/SAR
 - The HCS advised that a significant SAR/FOI request has been made and involves material stored across the organisation. The HCS has separately discussed how to manage the request with the PAM and HIO and has contacted the requester for clarification.
- Changes to Governance and Finance Officer (GFO) working days
 - The HCS advised that the GFO (Governance) has amended their working days to Monday, Wednesday and Friday afternoon.
- Jury Duty
 - The HIO flagged that staff faced difficulties identifying what category of leave is considered for jury duty. The SMT agreed that jury duty should sit separately from special leave. The SMT reaffirmed that staff are entitled to paid leave for the full period of their duty. This should not affect their Special Leave. HRFO to update policy and have it reviewed and agreed by SMT.

Actions:

- i. HRFO to update special leave policy on jury duty.

9. Next meeting

- 13.30 on Thursday, 13 March 2025

10. Meeting papers

The following papers provided background and supporting information to the meeting.

- [Corporate Monthly Report January and February 2025](#)
- [Standards Monthly Report January and February 2025](#)
- [Public Appointments Monthly January and February 2025](#)

CORPORATE MONTHLY REPORT

January and February 2025

Report to the Senior Management Team on 20 February 2025 covering corporate activities during December 2024 and January 2025.

1. Stakeholder engagement

- 9 January – HRFO attends employment webinar
- 22 January – online ESC Team meeting
- 31 January to 7 February – Internal audit review of business continuity arrangements
- 3 February – IMITO met internal audit regarding business continuity review
- 4 to 11 February – Internal audit prior year follow-up review
- 4 February – HCS and GFO met internal audit to discuss programme for 2025/26 and 2026/27
- 6 February – HRFO met SPSO for demonstration of their learning management system
- 10 February – HCS met Audit Scotland to discuss external audit arrangements for the coming year
- 12 February – HCS and GFO met SLAB to discuss lease arrangements

2. Accommodation

- a. The HCS and GFO(F) met SLAB on 12 February to discuss costs. SLAB will provide ESC with earlier notice of changes to costs and quarterly updates of actual expenditure.
- b. There are no other property or facilities issues to report.

3. HR

- a. [Monthly Policy & Training report – January & February](#) (links to an internal ESC document)
 - i. Four financial procedures were updated and the Unacceptable Behaviour Register revised.
 - ii. The Business Continuity Plan and BSL Plan (**Agenda Items**) have been updated and circulated to the SMT for comment. Job description and workforce resilience project plans have also been circulated to the SMT for their input.
 - iii. A preliminary review of all Privacy Notices and the Privacy Policy has been completed. Relevant staff members will be contacted for input in specific areas.
 - iv. Review of Unacceptable Behaviour Policy, File Plan and Retention Schedule and Annual Financial and Business Planning Procedures are outstanding.
 - v. Reviews of the DSE policy, SMT terms of reference and finalisation of CST Scheme of Delegation are to follow. Updates to the Training and Grading Policies, Investigations Manual, Witness Policy and Guidance and Guide to Information are scheduled for April 2025.
- b. [Recruitment and induction](#)
 - i. There are no recruitment or induction exercises currently underway.
- c. [Training programme for 2024/25](#)
 - i. The HRFO will review the administration and provision of training during 2025.
- d. [Other HR matters to report.](#)
 - i. There are no other HR issues to report

4. Finance

- a. [Monthly Finance report](#) (links to an internal ESC document)

Following a further review of expenditure at the end of January, we were able to surrender a further £30,000 in budget. This brings the total budget surrendered in 2024/25 to £80,000. Surrendering the second PAO post accounts for over £70,000 of these savings with the balance being drawn from other budget headings, primarily legal costs.

- b. The GFO has prepared a business case for amending our bank account access to a service that offers more features including authorisation limits and separation from personal accounts. **(Agenda Item)**

5. Information governance

a. IT and cyber-security issues

- i. Multi-Factor Authentication for website users has been implemented. No issues regarding the implementation have been reported.
- ii. A phased introduction of Teams Groups has begun. Benefits and issues will be assessed as usage develops.
- iii. An IT Checklist for PAAs has been finalised. This allows PAAs to provide ESC with assurance that their cyber security arrangements are sufficient.

b. Records management

- i. A refresh of Records Management policies and procedures, retention schedules and a data audit **(Agenda Item)** are underway.
- ii. Work to develop revised procedures for Data Protection Impact Assessments is progressing well. The revised forms and procedures have been supplied to the DPO for comment and initial Pre-Screening Questionnaires and DPIAs are drafted **(Agenda Item)**.
- iii. Since the last meeting four Freedom of Information requests have been received and four responses have been issued. There is one open request. No requests for review were received and an FOI Panel was not required. There is one appeal with SIC.
- iv. One subject access request has been received. No responses were issued since the last meeting. There is one open request.
- v. One very low risk potential and no actual data breaches were recorded in the period.

6. Miscellaneous matters

- a. There are no other matters to report this month.

STANDARDS MONTHLY REPORT

January and February 2025

1. Purpose of Report

This report provides the SMT with an up-to-date picture of operational performance. Data is used to describe volume, throughput and case turnaround. This is set out alongside a summary of where cases are in the system, referrals to the Standards Commission for Scotland (“SCS”) in the monthly period since the previous SMTM and completed and planned Hearings. Ongoing efforts to improve processes and system performance are also summarised in the report below.

2. Biennial Business Plan

- a) We continue to make good progress in the Year 1 priority areas as set out in the Biennial Business Plan. These include:
 - a. Seeking opportunities to engage and build relationships with key stakeholders (see point 3a-c)
 - b. Clear the cases that have waited over two months for initial assessment and put in place Key Performance Indicators (KPIs) to drive greater efficiency in case disposals. (see point 5.2)
 - c. Ensure systems in place to prevent a backlog arising and systems in place to clear a backlog where one arises and monitor any impact that this may have on the quality of investigations carried out (see point 5.1 and 5.2)
 - d. Improving our processes and approach to managing an efficient and effective complaints management system (see points 5.1 - 5.4 inclusive)
 - e. Review, revise and update the Investigations Manual on a regular basis and seek opportunities for appropriate third-party peer review on an annualised basis. (see point 5.4)
 - f. Provide opportunities for professional development in specialised areas (e.g. application of Articles of the European Court of Human Rights and associated case law, equality, diversity, and inclusion etc). (see point 5.5)
 - g. Ensure we communicate effectively with all stakeholders, using plain English wherever possible, and other accessible methods such as Easy Read, BSL and video. (see point 5.6)
- b) The Standards Team (“the Team”) action plan provides the specific steps and tasks needed to achieve the objectives/approach set out in the Biennial Business Plan. As part of that process, we have sought to cascade identified strategic objectives down to individualised personal objectives for colleagues in the Team. This alignment helps ensure that individual efforts contribute to meeting the objectives of the Corporate Plan. It is also intended to help in the efficient allocation of resources by ensuring that time, effort and investments are directed towards areas that support strategic priorities. As previously reported, we continue work to better align strategic projects within the portfolios of line managers, which may lead to some adjustments in team line management in the next financial year.

3. Stakeholder engagement

- a) As part of our plans to establish a new Quality Assurance Framework, the HIO and SIO met with colleagues from the Public Sector Ombudsman Wales (PSOW) at the end of November 2024. This was to discuss the potential for implementing a trial

quality assurance pilot which would involve them reviewing a small random sample of our investigation reports. External peer review is a key element of a strong and effective quality assurance process, and we are keen to capitalise on opportunities to collaborate with PSOW to take this forward. Following a very productive meeting we agreed to give further consideration to the timing and content of the reviews, and to provide PSOW with this information before the end of January 2025, which has now been completed. We are now awaiting their feedback before determining the next steps.

- b) On 16 December 2024, the ESC, SIO and HIO met with the SCS Chair, Members and office staff in our final biannual meeting of the year. A wide range of topics were discussed including progress with reducing waiting times and feedback from the recent MO workshop.
- c) Also, during December, the Team were invited to provide input to the SCS Advice Note for Councillors on Quasi-Judicial and Regulatory Decision-Making under Section 7 of the Code, in addition to the SCS Guidance on the Code. The Team have welcomed the opportunity to both review and contribute to the wide range of guidance and advice notes produced by SCS.

4. Operating an effective complaints system – Operational performance

Current Activity

Table 1 sets out current complaint and case volumes as they relate to Councillors, Members and MSPs, up until the end of January 2025.

Table 1 - Current complaint and case volumes

Stage	Cases	Complaints
Councillors		
New	2	2
Admissibility	17	20
Investigation	35	55
Interviewing	1	1
All info gathered		
Draft decision	4	4
Proposed report	2	2
Further investigation		
Members		
New		
Admissibility	3	6
Investigation	4	15
All info gathered		
Draft decision	1	1
Proposed Report		
MSPs		
New		
Stage 1	1	1

Stage 2		
Lobbying		
New		
Stage 1	1	1

Only highlights are provided in the report below. The full background data and further statistical analysis is available to staff via the following [link](#).

- a) In December and January, we received a total of 22 complaints about councillors/members (Cllr/M) that resulted in 19 cases. The case volume in January was roughly the same as the numbers received in January 2024. The case volume in December was lower than was received in December 2023. For both these months it is higher than was received in July-September and in November 2024 but is lower than the volume received in October 2024.
- b) A total of 4 new complaints about MSPs resulting in the same number of cases were received in December and January, which is roughly equal to the volume received in April- November in 2024, it is lower than the volume received in February and March.
- c) Case flow management for councillors and members complaints, which make up the large majority of case work, has significantly improved with all cases now lodged and triaged against a “Red, Amber, Green” (“RAG”) rating based on volume /complexity.
- d) The case pipeline has been intentionally re-adjusted to ensure a reduction in the number of cases at both the new and admissibility stage. This reflects a strategic decision to allocate more resources to these initial stages, allowing a quicker assessment of complaints before they are either closed or accepted for investigation. As a result of this shift, the largest concentration of cases now falls within the investigation stage. This stage encompasses cases at all varying points in the process, from evidence gathering and interviewing to the finalisation of reports. While the overall number of cases remains significantly higher than at any other stage in the process, their staggered progression ensures we maintain a constant and manageable flow of referrals to SCS.
- e) At the end of January, there were 20 Cllr/M cases at admissibility and 51 Cllr/M cases at various stages of investigation, with 6-8 expected for referral in February. Reports have been drafted/ have begun to be drafted for each of these cases, which are now either out for representation, or being finalised.
- f) We are currently assigning Cllr/Member cases up to end of January (however, one case from prior to January remains on hold for exceptional circumstances). We are up to date with allocation for complaints about MSPs.
- g) Complaints alleging disrespectful behaviour (which for our recording purposes includes bullying and harassing behaviour) continue to be the largest category of Cllr/M complaints, comprising around 65% of open complaints relating to either allegations of disrespect towards other councillors/members or members of the public. The next largest category - Declarations of Interest - accounts for around 8% of open complaints.

Reports referred to SCS

- Table 2 sets out the reports referred to SCS during December and January. Where SCS have decided to hold a Hearing, details of these are provided in Table 4.

Table 2 – Reports referred to SCS

Case Ref	Date of Referral	ESC Decision	SCS Action
LA/SL/3905	19-Dec-24	No breach	No further action
LA/PK/4067	19-Dec-24	No breach	No further action
LA/WD/4108	10-Jan-25	No breach	No further action
NHS/MIJB/4193	13-Jan-25	No breach	No further action
LA/WD/4109 & 4118	14-Jan-25	Breach	No further action
LA/H/4078	21-Jan-25	Breach	Hold a Hearing
LA/E/3961	24-Jan-25	No breach	No further action
LA/H/3964	30-Jan-25	No breach (due to A10)	No further action
LA/As/4125	30-Jan-25	No breach	No further action
LA/SI/4102	31-Jan-25	No breach	No further action

Hearings held by the SCS

- Table 3 sets out details and the outcome from Hearings held in December and January & early February. The ESC presented at both Hearings in December and January and the SIO presented at the Hearing in February.

Table 3- Hearings held in December 2024 and between January - 7 February 2025

Case Ref	Date of Hearing	Outcome of Hearing	Sanction
LA/NL/3978	10/12/2024	Breach	2-month suspension
LA/Mi/4131	15/01/2025	No Breach	N/A
LA/AC/3986	04/02/2025	No Breach	N/A

Future Hearings

- Table 4 lists Hearings scheduled by SCS based on reports referred up until the end of January. The pre-Hearing meeting for LA/AB/3953 was held on 13 January and the Commissioner attended.
- Pre-Hearing meeting for LA/H/4178 has yet to be confirmed. For LA/H/3969 this will take place on 15 April 2025 online and the Commissioner will attend.

Table 4 – Future scheduled hearings

Case Ref	Date of Hearing	In Person/On-line	Case Presenter
LA/AB/3953	19/02/2025	On-line (in private)	Commissioner
LA/H/4178	26/03/2025	On-line	HIO
LA/H/3969	15/04/2025	In-person	Commissioner

5. Operating an effective complaints system – Change and innovation

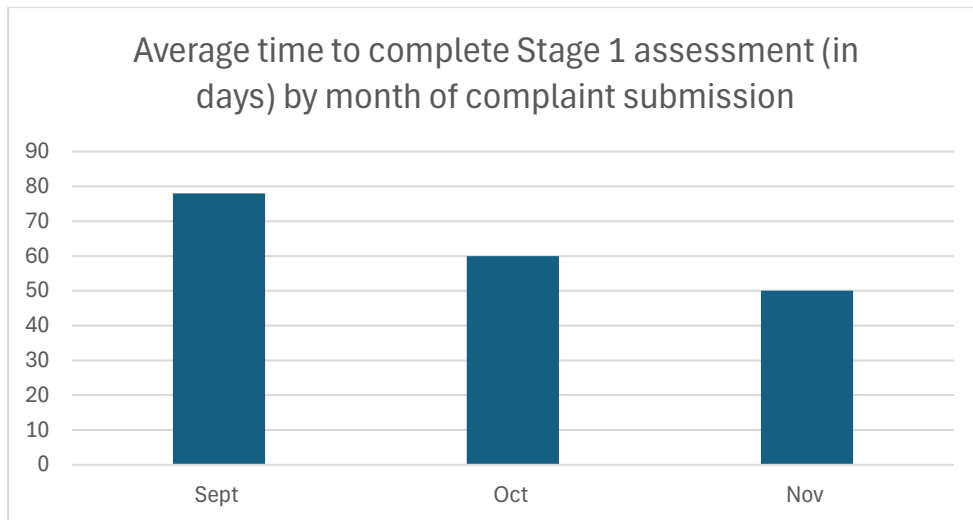
5.1 Complaints allocation plan

- a) As reported in the last SMT report in December, we remain in the trial phase of the complaints allocation plan (CAP). Indications are that this is progressing well and continuing to have a positive impact. The trial CAP was due to finish at the end of December 2024, but we have decided to extend it for a further 4-month period until the end of April 2025 to coincide with the end of the DIO trial. Extending the CAP so that the trial finishes at the same time as the Duty IO pilot will allow us to evaluate the impact of both initiatives together and make a decision about whether to adopt either or both on a permanent basis.

5.2 Waiting Times

- a) As set out in our prior annual reports we made good progress in reducing waiting times in preceding years. However, we recognised this year that waiting times remained too long, particularly at Stage 1, and in the first two quarters of 2024/25, we have recorded an average quarterly four month wait time to assess a case and advise both the Complainer and Respondent of its outcome. We have therefore put in place a range of measures to reduce waiting times.
- b) Our current system for handling complaints ensures that Investigating Officers manage each case from start to finish. This includes both the assessment (Stage 1) and the detailed investigation (Stage 2, if it is deemed admissible at Stage 1 for investigation). To further improve efficiency and reduce wait times, we have added extra resources to the assessment stage. In early December, the HIO and SIO prioritised assessments for all outstanding complaints we received in the previous three months. This means for an initial period we are running two processes in parallel, to help minimise delays and ensure that complaints move through the system more efficiently and smoothly.
- c) The new approach at Stage 1 is complemented by measures to ensure investigations and reporting at Stage 2 are proportionate so that time and resources can be made available and dedicated to decreasing Stage 1 wait times. This has included the introduction of a new report template, allowing us to take a proportionate and more efficient approach when reporting on 'no breach by reason of Article 10' for referral to SCS.
- d) An analysis of average number of days each month from September-November 2024, has identified that allocating this additional resource to Stage 1 assessment has already had a significant impact. The table below sets out the average monthly waiting times for completion of Stage 1 assessment for cases lodged with us between September – November. This shows a significant improvement when compared with the year-to-date average of 140 days for completing Stage 1.

Exhibit 1 – Average time to complete Stage 1 assessment (in days) between September – November 2024



Source: CMS Data

- e) We have now cleared almost all the cases that have waited over two months for initial assessment and expect this to be fully complete by the next SMT meeting in March. In parallel to this we are also developing new KPIs to ensure greater efficiency at Stage 1 and these will be in place for the start of 2025/26. The benefits of all this work and our efforts to reduce Stage 1 assessment times are significant. Respondents will be notified more quickly whether a complaint made against them has been dismissed or accepted for investigation, allowing earlier clarity and the opportunity to respond at an early juncture. At the same time, Complainers will receive an outcome in a timelier manner, ensuring a more efficient and responsive process for all parties involved.
- f) As set out above, we anticipate a wide range of benefits from our revised approach to Stage 1 assessment, which prioritises and addresses stakeholders' key concern on current wait times. However, the limitation to this is that work against certain items in the biennial plan will likely have to be delayed to later in the current financial year or take place in the next financial year instead and we are currently re-prioritising activity within our business plan.

5.3 Duty IO Role

- a) To further reinforce the steps set out above, we have implemented a range of additional measures, including the introduction of a Duty IO Role. This role focuses on the early identification of straightforward cases that could be promptly closed, ensuring a more efficient process.
- b) We successfully introduced the Duty IO role in mid-November for a trial period of 16 weeks. Each IO will serve as the Duty IO for a one-week period on a rotating basis. During their assigned week, they will be responsible for reviewing all the complaints received in the previous seven days to ensure that the necessary information for assessment is gathered. Additionally, they will take a lead role in overseeing the processing of new complaints, ensuring efficient triaging including the prompt closure of straightforward cases. The Duty IO rota will include both the HIO and SIO.

- c) All participating team members have now had at least one opportunity to be the Duty IO as we have now completed a full rotation. Feedback from colleagues has been consistently positive. This new DIO role is also making a significant contribution to reducing stage 1 waiting times, as there is now no delay in contacting Complainers to seek further information where required relative to their complaint, and once this information is gathered the case can quickly be picked up by an IO for assessment.

5.4 Investigation Manual

- a) Our Investigations Manual (“the Manual”) continues to serve as the standard operating procedure, guiding the Team in the assessment, investigation and reporting of complaints about breaches of the applicable Code of Conduct.
- b) We review the Manual 3/4 times each year to ensure it remains timely and fit for purpose. Updates take account of any issues or gaps raised by the Team while following the Manual’s processes. (This might be as a result of feedback, or an issue that they encountered during an investigation that requires clarification or more information in the Manual.) We have delayed the next update of the Manual until after the start of the 2025/26 financial year, so it can reflect the new approaches currently being trialled until April 2025, (but likely to be made permanent in some form) including the DIO role and the CAP. We are also planning to develop a web-based version of the Manual, once it has had a more substantive update. This will allow it to be accessed directly through the website rather than being a static file (such as a PDF or Word document that must be downloaded). This will allow anyone accessing the website to interact with Manual via a web browser without having to download anything.

5.5 Training and development

- a) A training session in relation to the application of Article 10 in the handling of complaints will now be held on 4 March 2025. The training has been arranged by the Wales Ombudsman, and we will join colleagues from their team for the session.
- b) The Team participated in the Equality, Diversity and Inclusion (EDI) training that was arranged for the whole organisation on 6 December. In advance of this, on 3 December, the HIO and SIO attended an EDI session alongside the rest of the SMT to focus on their leadership responsibilities in this important area.

5.6 Easy Read

- a) We have now completed Stage 1 of our Easy Read project, which supports our strategic objectives in both our Communications Strategy and Corporate Plan. The work has been led by the Public Appointments Officer, supported by the HIO, SISO and the ISO on behalf of the Standards Team. The input from the SISO and ISO has been particularly helpful, given they are first line responders on both the phone and by email with Complainers. Five Easy Read guides have now been produced and are available on our website as follows:

1. [What you need to know and do to make a complaint](#)

2. [Making a complaint about a cllr/m](#)
3. [Making a complaint about an msp](#)
4. [How we investigate complaints about cllr/m](#)
5. [How we investigate complaints about msp](#)

b) By way of background, Easy Read is intended to be a way of making written information easier to understand, by using simple language and illustrating pictures. We envisage that this project and the publication of these guides on our website, will offer several benefits to both the organisation and the public in terms of enhanced accessibility, improved communication and increased engagement.

6. Miscellaneous matters

- There are no such matters to report this month.

7. Recommendation

- The SMTM is asked to note the information set out in the report and refer to the meeting agenda for items for further discussion/approval.

PUBLIC APPOINTMENTS MONTHLY REPORT

January and February 2025

1. Stakeholder engagement

- 20/12/24 – Discussion with panel chair re current appointment round
- 30/1/25 – Accessibility working group

2. Update on Biennial Business Plan

- Action plans for 2024-28 and more detailed for 2024-26 have been prepared.
- Interim reviews complete.
- The first thematic review underway.
- Good practice case study published in December
- Diversity project well underway

3. Current appointments volume and status

- 40 new PAA allocations were made in the current financial year (including 3 shadow rounds) to end (51 in previous year).
- Total rounds open at 31/01/25 were 18 compared to 21 at 31/01/24.
- 56 Reappointments were publicised since the beginning of the financial year to the end of January compared with 67 in 2023/24
- 47 rounds concluded in financial year to date with 30 panel chair end of round reports received.
- In the calendar year 2024, 84 applicant surveys have been run (or in progress), with a 31% response rate
- See graphs below for more information on volumes and status of current appointment rounds.

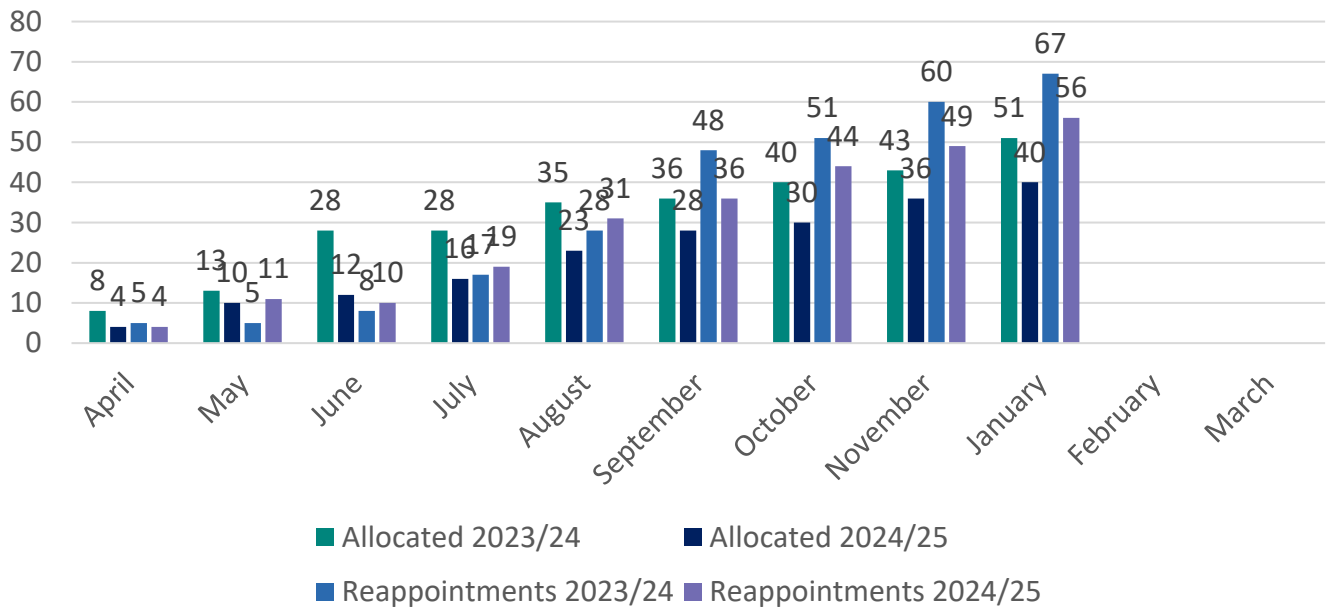
4. Contacts and Enquiries

- 437 Contacts and Enquiries have been responded to in the financial year up to 31/01/25 (571 in financial year 2023/24 to 31/01/24).
- Two reports of non-compliance have been made under the 2022 Code in year to date to 31/01/25.
- See graphs and tables below for further information.

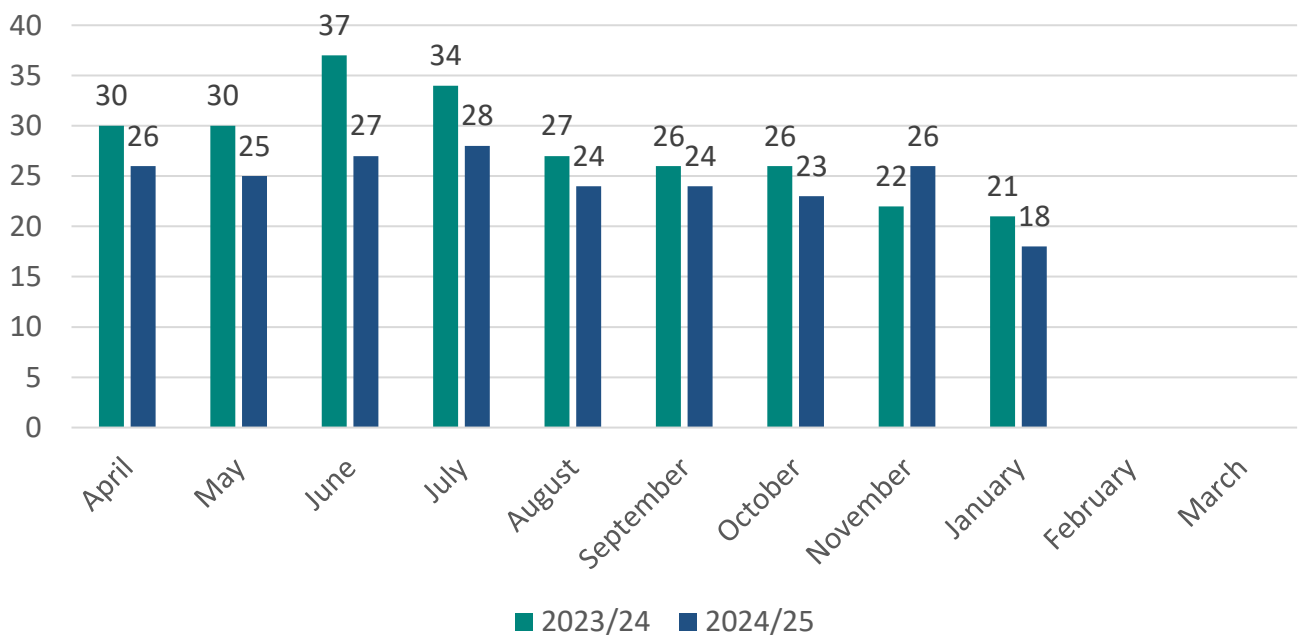
5. Tables and Graphs

2024/25		Reappts.	2023/24		Reappts.
Number of rounds allocated in year to date (until 31/1/2025):	37*	56	Number of rounds allocated in year to date (until 31/1/2024):	51	67
Full oversight	19*		Full oversight	31	
Full planning	12*		Full planning	16	
Early engagement	4		Early engagement	2	
Combination	2		Combination	0	
No oversight	0		No oversight	2	
Number of rounds currently open (as at 31/1/2025):	16**		Number of rounds currently open (as at 31/1/2024):	21	
Full oversight	13**		Full oversight/ High risk	17	
Full planning	2		Oversight to planning/ Medium risk	2	
Early engagement	0		Oversight early engagement	0	
Combination	1		Combination	0	
No oversight	0		No oversight/ forward look/ low risk	1	
			*40, 21 and 13 on database, new PAA allocated to shadow on round **18 and 14 on database, new PAA allocated to shadow on round		
Number of rounds concluded since beginning of financial year	47				
Number of panel chair end of round reports submitted since beginning of financial year	30	64%			
Since the beginning of 2024 Calendar Year (1 Jan 2024 - 31 Dec 2024):					
Number of rounds with an applicant survey open (or concluded)	84	100%			
Overall response rate		31%			

Rounds allocated and reappointments made in year to date



Rounds open at the end of the month



JANUARY (as at 31/01/25)	
Enquiry type	205 Enquiries Total
Advice on Code	120
Advice on Good Practice	1
General enquiry on work of office	11
Other	42
Request to discuss exceptional circs	31
	205
Report type	232 reports total
PAA End of round report	40
PC end of round report	33
Concern about appt round	59
Report an update on a round	54
Report good practice	9
Other	35
Report non-compliance	2
	232

