



Complete Agenda

Democracy Service
Swyddfa'r Cyngor
CAERNARFON
Gwynedd
LL55 1SH

Meeting

STANDARDS COMMITTEE

Date and Time

10.30 am, MONDAY, 8TH JUNE, 2026

Location

Cyfarfod Rhithiol / Virtual Meeting

(For public access to the meeting, please contact us)

Contact Point

Gwen Roberts

GwenAlawRoberts@gwynedd.llyw.cymru

STANDARDS COMMITTEE

Membership

Elected Members (3)

Councillors

Anne Lloyd-Jones
Beth Lawton
Dewi Owen

Independent Members (with a vote) (5)

Hywel Eifion Jones
Mark Jones
Non Gibson
Carys Edwards
Neil Hawkins

Community Committee Member (with a vote) (1)

Richard Parry Hughes

A G E N D A

1. APOLOGIES

To receive any apologies for absence.

2. DECLARATION OF PERSONAL INTEREST

To receive any declaration of personal interest.

3. URGENT ITEMS

To note any items that are a matter of urgency in the view of the Chair for consideration.

4. MINUTES

4 - 9

The Chair shall propose that the minutes of the previous meeting of this committee held on 23 February 2026 be signed as a true record.

5. THE STANDARDS COMMITTEE'S ANNUAL REPORT 2025-26

10 - 39

To submit the report of the Propriety and Elections Manager.

6. WHISTLEBLOWING POLICY AND PROCEDURE FOR MEMBERS

40 - 50

To submit the report of the Monitoring Officer.

7. ALLEGATIONS AGAINST MEMBERS

51 - 64

To submit the report of the Propriety and Elections Manager.

STANDARDS COMMITTEE, 23/02/26

Present: -

Elected Members: - Councillors Anne Lloyd Jones, Beth Lawton and Dewi Owen.

Independent Members: Mr Hywel Eifion Jones (Chair), Mr Aled Jones, Ms Non Gibson and Mr Mark Jones.

Community Committee Member: Mr Richard Parry Hughes

Also in Attendance: Iwan Evans (Monitoring Officer), Sion Huws (Propriety and Elections Manager), Gwen Roberts and Jasmine Jones (Democracy Services Officers).

1. ELECTION OF CHAIR

RESOLVED to elect Mr Hywel Eifion Jones as Chair of this Committee.

2. ELECTION OF VICE-CHAIR

RESOLVED to elect Mr Mark Jones as Vice-chair of this Committee.

3. APOLOGIES

No apologies were received.

4. DECLARATION OF PERSONAL INTEREST

None to note.

5. URGENT ITEMS

None to note.

6. MINUTES

The Chair signed the minutes of the meeting of this Committee held on 3 November 2025, as a true record.

7. STANDARDS COMMITTEE MEMBERSHIP

The report was presented by the Propriety and Elections Manager. Mr Aled Jones was thanked for his work on the Committee over the years.

It was noted that both empty seats would be advertised, and that the intention was to report to the Council in May with recommendations.

The recent change in the Regulations was highlighted, relaxing the restrictions for being a member of the Standards Committee as an independent member. Details were given of this noting that the change enabled former members and former officers of the authority's Committee to be independent members of the Standards Committee after two years of being a non-member/officer.

The importance of filling these empty seats promptly was highlighted, and it was hoped that the roles would engage a lot of interest in light of the changes to the Regulations.

DECISION

To note the information.

8. PROPOSED WORK PROGRAMME FOR 2026-27

The report was presented by the Monitoring Officer.

It was stated that the draft Work Programme had been set out for the Committee's work for 2026-27. An inconsistency between the dates in the Welsh and English reports were noted, confirming that the correct date of the meeting was 8 June.

A proposal was made to add an item to the November agenda, highlighting that it was customary for the Committee to meet the leaders of the political groups.

It was confirmed that the Work Programme was a live document, meaning that any item arising and requiring attention could be added.

Reference was made to conducting a review of the training situation for community and town councils, as it was a matter that had been discussed by the Committee for a while now. The pressure on staffing was mentioned, meaning that this work could not be prioritised, and it was added that the Senedd Election in May was also taking up the Team's time. It was proposed that a report should be presented on the matter to this Committee in June. The importance of looking at the item on New Member Induction Arrangements was emphasised in terms of town and community councils too.

DECISION

- 1. To review the Proposed Programme and propose any modifications.**
- 2. Following a discussion by the Committee, the proposal to add an item to the Committee's meetings in November and June was accepted.**

9. ALLEGATIONS AGAINST MEMBERS

The report was presented by the Propriety and Elections Manager.

It was explained that the purpose of this item was to share information with members regarding the Ombudsman's decisions on formal complaints against members.

It was mentioned that a matter involving a former member of this Council had been before the Adjudication Panel for Wales.

It was highlighted that there had been two instances where Article 10 of the European Convention on Human Rights had been considered, and a reference was made to the challenge in interpreting such cases was referenced. It was noted that there was a regular discussion around where Freedom of Expression fell, and the protection it is given when complaints were made about comments. It was highlighted that political Freedom of Expression was a difficult concept to convey at times, in terms of the nature of political discussions.

In reference to a particular case, it was stated that it underlined that bringing into disrepute applied to life more widely than merely an individual's role as a Councillor. It was added that this highlighted the expectations in terms of members' general behaviour.

The importance of informing the Monitoring Officer of any emerging breach of the Code of Conduct was emphasised. It was added that the member who was the subject of the conduct was also expected to contact the Monitoring Officer, to explain the situation as soon as possible.

Reference was made to the inconsistency between the dates noted in point 7.2.11 of the Welsh version and the English version of the Adjudication Panel report, and it was confirmed that the Welsh reported noted the correct date.

DECISION

To note the information.

10. AMENDMENTS TO THE MEMBERS' CODE OF CONDUCT AND THE COUNCIL'S WHISTLE-BLOWING POLICY

The report was presented by the Monitoring Officer.

The Committee was informed of statutory changes to the Members' Code of Conduct, arising from the new Regulations that came into force at the end of January this year.

It was highlighted that the changes were quite technical, of which details were given, and it was noted that changing the Members' Code of Conduct and Behavioural Principles was likely to be because of a recent decision by the Supreme Court about equality.

It was reported that this change placed the definition contained in the Equality Act 2010 in the Code of Conduct, and therefore that the protection was now on the basis of Protected Characteristics under the Equality Act 2010.

It was explained that this tidied up the Code of Conduct but did not change the rights and responsibilities of the members.

In addition, it was stated that Wales had brought into force the duty to deal appropriately with socio-economic circumstances under the Equality Act 2010. It was therefore recognised that the Code had been amended so that there was a duty not to discriminate based on socio-economic circumstances. It was noted that the Full Council was required to adopt these revisions formally into the Code.

Reference was made to Cyngor Gwynedd's Response Plan, and it was highlighted that the Cabinet had adopted the revised Whistleblowing Policy at its January meeting this year as part of their response. As it was a document in the Council's Constitution, the Monitoring Officer confirmed that it was his duty to report, for information purposes, to the Full Council that the document had changed.

The importance for members of the Standards Committee to also be aware of this change was noted.

A question was asked around the protection of the Welsh language. As the Welsh language was not a Protected Characteristic under the Equality Act 2010, it was confirmed that the Welsh Language Measure 2011 gave protection to the Welsh language.

DECISION

To accept the information.

11. THE GIFTS AND HOSPITALITY REGISTER FOR MEMBERS

The report was presented by the Propriety and Elections Manager.

It was stated that the Register was regularly reported to this Committee. Reference was made to a previous discussion about the fact that the Register was not currently published on the Council's website.

It was noted that the Code of Conduct for Councillors required members to provide written notice to the Monitoring Officer of any offer of hospitality, material benefit or advantage valued at more than £25.

They went on to discuss the Protocol on Members' Donations and Hospitality which had been adopted by the Council, which provided guidance to Members on how to deal with proposals.

The Committee's previous discussion about the appropriateness of publishing the Register of Gifts and Hospitality on the Council's website was mentioned, and it was confirmed that it was now a statutory requirement to publish the Register of Members' Interests on the website.

Reference was made to the Protocol stating that the public could come in to view the Register of Gifts and Hospitality, and some of the Principles contained in the Code of Conduct were highlighted.

The need to be aware of any implications in terms of data protection was emphasised, recognising that there may be some special cases where it would not be appropriate to release the information.

It was concluded that there was no reason as to why the Members' Donations and Hospitality Register should not be published on the website, stating that it gave Members protection and contributed to the desire to be transparent and open. It was recognised that this was positive.

A question was asked about the procedure in going forward, should the matter be approved at this meeting. In response, it was confirmed that the principle of the Register being public had already been established in the Protocol. It was therefore noted that the Members would be informed of the change. It was added that the form used to note any gifts and hospitality was also being adapted, to highlight the fact that it was published on the website. It was noted that the Register had been included in the Council's Publication Plan, which was a plan to note which documents were publicly available from the Council. It was added that the Council tried to make any information public, although it had to be made public under the Freedom of Information Act. It was stated that this avoided the need for some freedom of information requests.

It was asked what the benefit was of making it public and what difference this made to the report received when the Committee previously discussed this matter. In response, it was highlighted that putting the Register on the website would mean that the names of the members in question would also be published. It was confirmed that the document was already public in paper format and that the only change was how it was made public.

Mr Aled Jones was also thanked for his contribution to the Committee's work and was wished well.

DECISION

Consider the findings contained in the report.

The meeting commenced at 10.30am and concluded at 11.20am.

Chair

Committee	Standards Committee
Date :	8 June 2026
Title	The Standards Committee's Annual Report 2025-26
Author	Propriety and Elections Manager
Action :	To provide observations and to approve the report

Background

1. The Standards Committee publishes an annual report to be presented to a meeting of the full Council. The Committee decided to do this as a means of raising the Committee's profile and of promoting its work.

2. The Local Government Act 2000 was amended by the Local Government and Elections (Wales) Act 2021, making it now a statutory duty for standards committees to report to their authority. This must be done as soon as practicable after the end of the financial year, in relation to that year (i.e. the 12 month period ending on 31 March).

3. The report must describe how the committee's functions have been implemented during the year. In particular the report must include a summary of:

- What has been done to carry out the general and specific functions given to the committee by the 2000 Act
- Reports and recommendations made or referred to the committee by the Public Services Ombudsman for Wales
- Actions taken by the committee after it has considered such reports and recommendations;
- Notices given to the committee by the Adjudication Panel for Wales

A report by a county council's standards committee must also include:

- The committee's assessment of the extent to which leaders of political groups on the council have complied with their new statutory duties in relation to standards of conduct.

The report may include:

- Recommendations to the authority about any matter in respect of which the committee has functions.

4. The authority must consider every annual report made by its standards committee before the end of 3 months which starts on the day the authority receives the report.

5. A draft Annual Report for the financial year 2025/26 is attached for the attention of the Committee.

Recommendations

6. To approve the Committee's Annual Report.

DRAFT

**THE ANNUAL REPORT
OF THE GWYNEDD
COUNCIL STANDARDS
COMMITTEE**

2025 - 2026

FOREWORD BY THE CHAIR

standards in public life is a topic that is receiving a lot of attention at the moment, emphasising the importance of individuals' behaviour in maintaining public confidence in the manner in which decisions are made on their behalf by their elected representatives. I am confident that this committee can continue to provide support and guidance to the members of Gwynedd Council and the members of the community, town and city councils within the county.

Hywel Eifion Jones
Chair of the Standards Committee

FOREWORD BY THE MONITORING OFFICER

Supporting and promoting high standards of behaviour is a core part of this work. This is achieved through a combination of being available to advise advice, proactive advice and training. In my opinion, training and understanding of the Code of Conduct gives members a foundation to be familiar with the fundamentals of the Code. This is particularly around the personal interest provisions, where they arise and how to respond. Not only from the point of view of propriety but also from the point of view of supporting proper preparation for meetings and undertaking your day-to-day functions. However, it is disappointing to note again that a number of members remain without attending the full courses that have been held. The Code of Conduct training regime will need to be given consideration in preparation for the 2027 election.

Ultimately, it is a consensus about the type of Council we want to see and work in that best represents the foundation. A culture of propriety does not predispose to healthy and forceful political debate. But, it does give the public confidence about the kind of quality of governance that exists in Gwynedd. This supports the focus of our work on interventions, guidance and support that develop and maintain the expected standards.

Iwan Evans
Monitoring Officer
Cyngor Gwynedd

INTRODUCTION

The Committee was established in 2001 under the Local Government Act 2000. The main role of the Committee is to promote and maintain high standards of conduct by the councillors and co-opted members of Gwynedd Council, and community and town councils in Gwynedd. It does this in many ways:

- Assisting the councillors and co-opted members to follow the Members' Code of Conduct
- Advising the authority regarding adopting or amending the Members' Code of Conduct
- Monitoring the implementation of the Members' Code of Conduct
- Advising, training or arranging training for councillors and co-opted members on matters relating to the Code of Conduct
- Determining complaints referred to it by the Public Services Ombudsman for Wales that members have breached the Code of Conduct
- Considering applications made by members for dispensation to allow them to participate in discussions despite them having a prejudicial interest under the Code.
- Considering matters referred to it under the Gwynedd Council local complaints resolution procedure.
- Overseeing the Gwynedd Council Members' Gifts and Hospitality Policy.

The Annual Report

The Local Government Act 2000 was amended by the Local Government and Elections (Wales) Act 2021, making it now a statutory duty for standards committees to report to their authority. This must be done as soon as practicable after the end of the financial year, in relation to that year (i.e., the 12 month period ending on 31 March).

The report must describe how the committee's functions have been implemented during the year. In particular the report must include a summary of:

- What has been done to carry out the general and specific functions given to the committee by the 2000 Act?
- Reports and recommendations made or referred to the committee by the Public Services Ombudsman for Wales

- Actions taken by the committee after it has considered such reports and recommendations.
- Notices given to the committee by the Adjudication Panel for Wales

A report by a county council's standards committee must also include:

- The committee's assessment of the extent to which leaders of political groups on the council have complied with their new statutory duties in relation to standards of conduct.

The report may include:

- Recommendations to the authority about any matter in respect of which the committee has functions.

The authority must consider every annual report made by its standards committee before the end of 3 months which starts on the day the authority receives the report.

COMMITTEE MEMBERS

Though the Standards Committee is a Gwynedd Council committee, the majority of its membership does not have any connection with the Council or local government ('Independent Members'). It also has a member who represents the interests of the community councils ('Community Committee Member'), as well as three elected members from Gwynedd Council. The Chair and Vice-chair of the Committee must be Independent Members.

Independent Members

Hywel Eifion Jones (member since 2019, Chair)

Born and educated in Dyffryn Clwyd, Eifion was a senior manager with Barclays Bank and served for 34 years in a number of branches across North and Mid Wales. He has undertaken many public services roles including a County Councillor with Isle of Anglesey County Council and a member of the North Wales Police Authority. Currently, he is a Magistrate on the North West Wales bench and is a member of the Gwynedd Pensions Board, Gwynedd Council's Governance and Audit Committee and is the Chair of Adra . He is also a member of the Adjudication Panel for Wales which determines allegations of County and Community elected members breaching the code of conduct.

Mark Jones (member since December 2022, Vice-chair)

Mark lives in Bangor and is a former police officer with 30 years experience in a variety roles, including as Head of Professional Standards for North Wales Police. He served as a Community Governor and Vice Chair at Ysgol Glanadda for 20 years. He is also a former Chair of Adra, where he continues to serve as a Board member

Non Gibson (member since 2025)

Non lives in Bethel, Arfon with over 23 years' experience as a Police officer completing her career as a sergeant. She has worked on a range of issues and Chaired the Early Intervention Team along with working on multi-agency issues and of course experience working within the justice system.

Aled Jones (member from 2016 - 2026)

Aled is originally from Lampeter in Ceredigion. He read Welsh and Geography at Aberystwyth University. After graduating in 1999, he moved to Caernarfon to work with Cymen (Welsh translation company) and became a joint owner of the company in 2007. He now employs a team of almost 30 employees and over 20 freelance translators. He lives in Bangor with Tegwen and their children, Cai and Beca. He recently completed a post-graduate qualification in Leadership and Management ILM

Level 5. The programmes create an environment where leaders are stimulated to exceed their potential, drive innovation, embed learning and to continue their development. His work as an interpreter has also given him a unique insight to the workings of government from the European Union to local community councils and is therefore in a privileged position to observe best practice in terms of conduct and standards.

Sonal Khade (member May – November 2025)

Sonal lives in Pwllheli and has a background in finance and contract management in the public sector. Now self-employed. She has worked at a high level within local government and health leading on audit projects and issues.

Appointment of New Independent Members

Aled Jones' second term of office came to an end after a period of 10 years of service to the Committee. Furthermore, Sonal Khade stepped down from the Committee during the year. The vacancies were therefore advertised in accordance with the statutory provisions and three applications were received.

An Appointments Panel was established, which comprised Mr Eifion Jones, Chair of the Standards Committee, Community Councillor Richard Parry Hughes (Community Member of the Standards Committee), Gwynedd Councillors Ioan Thomas, Chair of the Council and Anne Lloyd Jones Chair of the Democratic Services Committee and Mr Griffith Jones as the statutory lay member.

The Panel, supported and advised by the Monitoring Officer, interviewed the candidates, and having regard to the criteria set out in the person specification for the role, the Panel recommended the appointment of Carys Edwards and Neil Hawkins. The appointments were confirmed by a meeting of the Full Council on 14 May 2026

Carys Edwards

Carys who lives in Parc, Bala has held senior officer positions in the Isle of Anglesey County Council and the Welsh Government. She already serves as a lay member on the Governance and Audit Committee and the Governance and Audit Committee of Wrexham County Borough Council. She has also spent time on the management board of Grŵp Cynefin and the Management Board of Betsi Cadwaladr Health Board as an independent adviser.

Neil Hawkins

Neil lives in Bangor and has a background in education and charity. Until 2021 he was Principal of Concord College, an international school. He chaired the charity

"Humanists UK" until 2025 and serves as Chair of the charities "Befrienders Worldwide" and "Tough to Talk", suicide prevention charities.

Community Committee Member

Councillor Richard Parry Hughes (member since 2017)

Richard was brought up on a farm in Llanaelhaearn and attended Pwllheli Grammar School, Glynllifon Agriculture College and Seale Hayne College (Plymouth University). He has a post-graduate degree in Farm Management. He worked for a veterinary partnership in Chwilog for three years and as a part-time lecturer in Coleg Glynllifon before purchasing Penfras Uchaf farm in Llwyndyrys where his family had been tenants for over three hundred years. He is married to Eleri and they have three sons. The former leader of Gwynedd Council, he continues to farm. He has extensive experience of committees and has held roles such as the chairman of the Wales Federation of Young Farmers' Clubs before being elected as member of public bodies. He was a member of Gwynedd County Council from 1992 to 1996 and a member of Gwynedd Council from 1996 to 2008. He led Gwynedd Council from 2003 to 2008 and was also a spokesperson for the Wales Local Government Association on the Environment and Planning during this time. He is a keen member of Cwmni Drama Llwyndyrys and supports many other local organisations such as Antur Aelhaearn and Friends of Carnguwch Church. He volunteers as a case worker for the Farm Community Network. He has been a member of Llannor Community Council since 1992.

Gwynedd Council Members

Councillor Beth Lawton (member since 2017)

Beth lives in Brynchrug and is the owner of a local factory. She is a County Councillor for the Dro Dysynni area which includes the villages of Brynchrug, Abergynolwyn and Llanegryn. She is also a Community Councillor and the chair of the Ysgol Craig y Deryn Governing Body. She is active on several committees in the community including Abergynolwyn Carnival, Brynchrug Rural Fair, Tywyn Hospital Appeal Committee and many others. She is a member of Merched y Wawr and leads at Abergynolwyn Eisteddfod. She is a member of Cyngor Gwynedd's Care and Housing Scrutiny Committee and Education and Economy Scrutiny Committee and has been Chair of both committees since becoming a member. She is also a director and Chair of the Byw'n Iach Leisure Company.

Councillor Anne Lloyd Jones (member since 2017)

Anne lives and runs a farm tourism business in Tywyn, and she has represented Tywyn on Gwynedd Council since 1995 and was previously a member of the Meirionnydd District Council for eight years.

She was first elected member of Tywyn Town Council in 1985 and was Mayor in 1991, and again in 2004 and was Chairman of Gwynedd Council in 2009. She is former Chairman of Gwynedd Council Planning committee and the Democracy Services Committee and founder member of Cartrefi Cymunedol Gwynedd.

She was a member of the Meirionnydd Community Health Council and is currently Chair of the Tywyn and District Hospital Appeal Fund. She is also the Treasurer of the local NSPCC branch since 1989.

She is a member and a former chair of Ysgol Penybryn Governing Body and is also a member of the Governing Body of Ysgol Uwchradd Tywyn. Anne was the Chair of Mid Wales Tourism between 2001 and 2016, a founding member and former president and treasurer for the Tywyn Inner Wheel Club.

Anne is married to John and they have three daughters and twin granddaughters.

Councillor Dewi Owen (member since 2022)

Dewi farms in Aberdyfi and has been a County Councillor for Aberdyfi and Pennal for fifteen years, and on Aberdyfi Community Council for twenty-five years. He was elected Chair of Gwynedd Council in 2014. Dewi has been Chair of several scrutiny committees and is currently Chair of the Democracy Services Committee on Cyngor Gwynedd, and has joined the Standards Committee since 2022.

Dewi is Chair of Governors of Ysgol Uwchradd Tywyn, and a member of several local committees, such as the Meirion County Show, the Farmers' Union of Wales and 'Aberdyfi Advertising & Improvements Committee.

The Monitoring Officer

The Council's Monitoring Officer, Iwan Evans, along with officers from the Legal Service and the Democratic Service support the Standards Committee in its work. The Monitoring Officer has a statutory role to ensure that the Council, its members and its officers act appropriately and lawfully.

Contact Details

- Iwan Evans, Head of Legal Services and Monitoring Officer.

E-mail: IwanGDEvans@gwynedd.llyw.cymru Tel: (01286) 679015

- Sion Huws, Propriety and Elections Manager and Deputy Monitoring Officer.
E-mail: sionhuws@gwynedd.llyw.cymru Tel: (01286) 679168

THE COMMITTEE'S WORK DURING 2025 - 2026

The Committee's work over the year has included the following (the Committee's full work programme can be seen in **Appendix 1**):

Cases which appeared before the Standards Committee

No complaints of a breach of the Code of Conduct were referred to the Committee by the Ombudsman during the year.

Other complaints

The Committee is also notified of the Ombudsman's decisions on complaints that were not referred to the Committee for a decision, and a summary of these is provided in **Appendix 2**.

Dispensations

The Code of Conduct for Members provides that a councillor cannot participate in a discussion if he/she has a 'prejudicial interest'. However, a member has the right to apply to the Committee for permission to participate despite having this interest, i.e. dispensation.

No applications were received during the year.

The National Standards Committees Forum for Wales

The National Forum of Welsh Standards Committees has now been established, in order to share good practice co-ordinate events and create a support network for committee chairs. The meetings are attended by the chairs of all Welsh standards committees along with representation from the authorities' Monitoring Officers to provide professional advice. The secretariat is provided by the Welsh Local Government Association.

Support for Community, Town and City Council Members

There are 3 elements of support that can be offered to members and clerks of community councils on matters relating to the Code of Conduct:

1. Advice on specific issues –by contacting the Monitoring Officer or the Deputy Monitoring Officer.
2. Gwynedd Council website - Standards Committee includes information and guidelines as well as links to other useful websites.
3. Training – the intention is to hold a virtual training session in the form of a webinar. This would create a resource that members could watch when it suits them rather than having to rely on sessions held in specific places and times.

The Duty of Political Group Leaders

Section 52A(1)(a) of the 2000 Act (as amended by the 2021 Act) requires that a leader of a political group consisting of members of a county council or county borough council in Wales, must take reasonable steps to promote and maintain high standards of conduct by the members of the group. A “group” for this purpose is defined as 2 or more members who give notice to the Proper Officer that they wish to be treated as a group for the purposes of political balance requirements and the allocation of seats on Council Committees

The guidance makes it clear that this duty does not make leaders of a political group accountable for the behaviour of their members, as conduct is a matter of individual responsibility. However, they do have a role in taking reasonable steps in maintaining standards, setting an example, using their influence to promote a positive culture, being proactive in promoting high standards of conduct in their group and addressing issues as soon as they arise. A leader of a political group who fails to comply with the new duty in a meaningful way, may potentially be regarded as bringing their office into disrepute, and likely to be in breach of the Code.

Section 62(3) of the 2021 Act amends section 54 of the 2000 Act to extend the specific functions of a Standards Committee to include monitoring compliance by leaders of political groups with the new duty to promote and maintain high standards of conduct by members of their group. Political group leaders and Standards Committee should agree on the form and frequency of a report from each group leader to the Committee, which would then consider each report and provide feedback to the group leaders. Standards Committee must also provide advice and training or arrange to train group leaders on the new duty. At the start of each Council term this should take place within six months of the election and be reviewed at least annually. The guidance also suggests that the Standards Committee may wish to meet with group leaders periodically to review arrangements.

In November 2023, the Standards Committee met with the leaders of the three political groups on the Council – Plaid Cymry, the Independents and Liberals/Labour Group to agree how this duty should be monitored and the nature and frequency of information that should be submitted to the Committee. This is now the basis for maintaining and monitoring the system.

During this year a meeting was held between the Group Leaders and the Monitoring Officer. The has been held again this year. The working relationship with each Leader is positive and supportive. While the situation regarding attendance at training is disappointing, we can be confident that the Leaders appreciate and have supported efforts to address this issue. This positive relationship gives confidence that the benefits of the new regime can be further built upon.

THE STANDARDS COMMITTEE'S WORK PROGRAMME 2025-2026

9 June 2025

- Self Assessment of the Committee's work during 2024/25
- Community Council Training
- Approval of the Standards Committee's Annual Report 2024/25
- Report on Declaration of Personal Interests at Meetings
- Regular report on allegations against members
- Consideration of the Ombudsman's decision on a complaint against a Community Councillor

3 November 2025

- Report on the Gift and Hospitality Register
- Review of the Internal Resolution Procedure
- Consideration of the Ombudsman's Annual Report 2024/25
- Minutes of the National Forum of Standards Committees
- Regular report on allegations against members

23 February 2026

- Report on the Membership of the Standards Committee
- Proposed Work Programme 2026 -2027
- Regular report on allegations against members

- Reforms to the Principles and Code of Conduct for Members
- Report on Members' Gift and Hospitality Register

Summary of a report issued under section 69 of the Local Government Act 2000 Case Number: 202501611

The Ombudsman received a complaint that a Former Member (“the Former Member”) of a community council (“the Council”) had breached the Code of Conduct (“the Code”). It was alleged that the Former Member had failed to declare an interest at a Council meeting in March 2025, regarding her association with a school (“the School”) and a charity (“the Charity”).

The Ombudsman’s Office started an investigation to consider paragraphs 11(1) and 12(1) (personal and prejudicial interests) of the Code. Information was obtained from the Council and the Charity. Comments were provided by the Clerk, the Complainant and the Former Member. The Former Member resigned from the Council during the investigation.

The investigation found that the Council made annual donations to the Charity (which supported the School) in 2024 and 2025, and the Former Member had been an employee of the School and a trustee of the Charity at the time. It was found that whilst the Former Member had declared an interest regarding the matter in 2024, she failed to do so for the same matter in 2025 and therefore, may have breached paragraphs 11(1) and 12(1) of the Code. It was also found, however, that her presence did not impact the outcome of the decisions made, and there was no evidence of direct financial or other gain to the Former Member and no evidence of harm to another because of her involvement in the meetings.

The Ombudsman found that given the facts around the business being considered, the breaches appeared technical in nature. Therefore, on balance, taking into account the limited nature of the matter, a lack of training or intent, incorrect advice and the Former Member’s resignation, the Ombudsman was satisfied that any suggested breaches were not Page 1 of 2 sufficiently serious to warrant a referral to the Standards Committee in the public interest.

The Ombudsman found that no action needed to be taken in respect of the matters investigated.

Decision issued under paragraph 69(2) of the Local Government Act 2000 Case Number: 202506877

Summary of complaint

It was alleged by a member of the public (“the Complainant”) that the Member had breached the Code by posting hateful and fear-mongering statements on social media relating to immigration.

How we decide whether to investigate

To decide whether to investigate a breach of the Code of Conduct (“the Code”), we apply a 2-stage test. First, we consider whether there is evidence to suggest that a breach of the Code may have occurred. Second, we consider whether it is in the public interest to investigate the matters complained about. We take into account a number of public interest factors such as:

- the seriousness of the alleged behaviour
- whether the member misused a position of trust or has sought to gain, for themselves or others, at public expense
- whether an investigation is required to maintain public confidence in elected members
- whether an investigation is proportionate in the circumstances or whether, if proven, a referral to a Standards Committee or the Adjudication Panel for Wales would be appropriate.

My Decision

(1) Whether there is evidence to suggest that there may have been breaches of the Code of Conduct.

The Complainant provided supporting documentation comprising of screenshots of 2 social media posts made by the Member. The nature and content of the posts relate to illegal immigration and are clearly aimed at the Council and the Police.

When assessing Code complaints, it is necessary to consider the nature of the allegations made against the Member complained about, in the context of the duties and obligations placed on them under the Code for elected/co-opted members. The Code usually only applies when a member of a council is performing functions as a councillor or seeking in some way to rely upon their status as a councillor. This is relevant because, based on the information presented and the context of the comments made, it appears the Member was acting in an official capacity in at least one of the social media posts.

It is acknowledged that the Complainant considers the Member’s comments to be hateful and fear-mongering. However, the posts appear to represent the Member’s views and opinion. The comments are not directed at a specific individual and focus mainly on what he believes, the Council and the Police should be doing about illegal immigration. The Member is entitled to hold and share his views, even if others do not agree, or indeed, are offended by them.

Article 10 of the European Convention on Human Rights (“ECHR”) (as incorporated in the Human Rights Act 1998) concerns freedom of expression. It states:

“1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers.

2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society...for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others”.

Article 10 is a qualified right and as such the right to freedom of expression may be limited by imposition of sanctions in respect of provisions prescribed by law, such as ones contained in the Code, provided the restrictions are necessary and proportionate and are in pursuance of a legitimate aim.

This means that even if a breach of the Code were to be proven in relation to anything that the Member is alleged to have said, in order for a sanction to be justified, it would need to be a proportionate interference with the Member’s right to freedom of expression. Caselaw on this issue has found that such interference is only likely to be proportionate if the language used was extremely serious.

That said, a Member’s right to freedom of expression is not absolute and must be balanced against the need to protect the rights and interests of others. The legal principles on this issue do not provide clear boundaries for what is, and what is not, acceptable, and each case must be considered on its own merits. Freedom of expression is not limitless and the more egregious the conduct concerned, the more justified it becomes to restrict expression using the provisions of the Code.

The Member’s comments relate to a political matter and therefore it is likely the Member would have enhanced protection under Article 10. In this case it is unlikely the Member’s posts, would be considered sufficiently serious that an investigation and/or sanction would be considered a proportionate interference with the Member’s right to freedom of expression.

High standards of behaviour are expected of local councillors in Wales. Councillors must balance their right to freedom of expression with their responsibilities to maintain respect and integrity. Councillors must treat others with respect and avoid personal attacks, harassment, or discriminatory comments. While the comments the Member made have caused some concern to the Complainant, the evidence provided is not indicative of outrageous or offensive behaviour which would be suggestive of a breach of the Code and/or warrant interference with the Member’s right to political speech on this occasion.

(2) Whether an investigation is required in the public interest

The conduct complained about does not meet the first stage of the test, as set out above, therefore, there is no need to consider the second stage of the test.

Outcome

The complaint should not be investigated.

Decision issued under paragraph 69(2) of the Local Government Act 2000 Case Number: 202508404

Summary of complaint

It was alleged that during a Council meeting, when discussing an update on a local business and its Trust Committee, the Member made misleading and upsetting comments about a Trustee (“the Complainant”).

How we decide whether to investigate

To decide whether to investigate a breach of the Code of Conduct (“the Code”), we apply a 2-stage test. First, we consider whether there is evidence to suggest that a breach of the Code may have occurred. Second, we consider whether it is in the public interest to investigate the matters complained about. We take into account a number of public interest factors such as:

- the seriousness of the alleged behaviour
- whether the member misused a position of trust or has sought to gain, for themselves or others, at public expense
- whether an investigation is required to maintain public confidence in elected members
- whether an investigation is proportionate in the circumstances or whether, if proven, a referral to a Standards Committee or the Adjudication Panel for Wales would be appropriate.

My Decision

(1) Whether there is evidence to suggest that there may have been breaches of the Code of Conduct

The Complainant alleges that the comments made by the Member during the Council meeting on 10 December 2025 are misleading and humiliating. In particular, the Complainant raised concerns that the Member had said ‘a letter has been sent to [the trustees] explaining the issues in simple terms, that every person would understand’. The Complainant’s view however was that the letter the Member referred to is highly technical, legal and requires expert interpretation. The Member further expressed the view that the Complainant had cost the Council thousands of pounds in legal fees. The Complainant said this was untrue and malicious.

Everyone has the right to the freedom of expression under Article 10 of the European Convention on Human Rights, which is incorporated into UK law by the Human Rights Act 1998. It may be helpful to explain that, when acting as an elected member and expressing political views or conducting political business, a member’s freedom of expression is

afforded enhanced protection, more so than an ordinary member of the public. Further, as politicians, members are likely to be afforded protection even where the language used by them may be inflammatory, provided the focus of it is political. Political comments are not confined to the Council chamber and can include comments members may make generally about their authority's policies or government policies. Political expression extends to all matters of public administration. However, a member's right to freedom of expression is not absolute and must be balanced against the need to protect the rights and interests of others. The legal principles on this issue do not provide clear boundaries for what is, and what is not, acceptable, and each case must be considered on its own merits. Freedom of expression is not limitless and the more egregious the conduct concerned, the more justified it becomes to restrict expression using the provisions of the Code.

I am not persuaded that the comments unfairly discredit the Complainant, it appears to me that they represent an opinion rather than a statement of fact. I am of the view that such comments can reasonably be regarded as political expression and would therefore benefit from enhanced freedom of expression.

Appreciating that the Complainant disagrees with the comments made, they are not sufficiently egregious or disproportionate that a restriction is necessary for the protection of the rights and interests of others. Criticism and disagreement of views forms part of democratic discourse and does not, in itself, amount to a failure to treat someone with respect. The Member is entitled to hold and share his views, even if others do not agree, or indeed, are offended by them. It is not uncommon for elected members to say things which others may consider to be rude or offensive however it is not the purpose of the Code to inhibit free speech and the robust expression of political differences. The Complainant said he considered the Member's comment to be slanderous, this however is a legal issue and the Complainant would need to seek legal advice regarding allegations of slander.

Evidence has not been provided to substantiate the complaint, and the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned may have breached the Code.

(2) Whether an investigation is required in the public interest

The conduct complained about does not meet the first stage of the test, as set out above, therefore, there is no need to consider the second stage of the test.

Outcome

The complaint should not be investigated.

Complaint 202407933

That a member of a town council had made a false report to the Police about the Complainant.

Decision

Not to investigate. The member was not acting as a member at the time. It was further considered whether it might have brought the authority or member into disrepute. The police concluded that there was insufficient evidence and they did not want to pursue the matter. There was therefore no suggestion or conclusion that the report made was false or a waste of Police time.

Complaint 202408934

That a town council member falsified records when acting in her employment. It was also alleged that she had failed to declare an interest when the funding of a local scheme was discussed.

Decision

Not to investigate. The member was not acting in her capacity as a member and no evidence had been presented to suggest that the alleged conduct, which had not been proven, brought the council into disrepute. No evidence was also presented to support the claim that the member failed to disclose an interest.

Complaint 202409315

A complaint by a member of the public, that a member of a town council behaved in an aggressive manner at a meeting with the staff of a local business and also failed to disclose that another member had a personal interest in connection with the business at the annual meeting of the council. It was also alleged that, at a separate meeting, he had made vexatious complaints to HMRC about the company. It was finally alleged that the member had been shouting and yelling at the council clerk.

Decision

Not to investigate. No evidence had been presented to support the allegations.

Complaint 202409316

That a town council member is trying to harm a local company by abusing his position as a councillor. The Complainant alleged that the Member harassed staff and tried to get them to leave their jobs. It was also alleged that the Member had made malicious and vexatious complaints about the company to Natural Resources Wales and that he had given negative reports about the business at Council meetings, while failing to report positive news.

Decision

No investigation. No evidence was presented to support the complaint, and the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned may have breached the Code. It is the responsibility of the Complainant to provide direct evidence in support of their complaint.

Complaint 202307896 and 202310159

That a former member of a town council had failed to declare an interest in respect of a series of council meetings that considered a Trust

Decision

The investigation found that in respect of a number of Council meetings, the Former Member did not declare an interest and took part in discussions and voting in matters in which he had a prejudicial interest. The investigation found, however, that there was mitigation on the part of the Former Member given the complexities of the situation. Significantly, the Member had been voted by his fellow councillors to act as the Council's representative for the Trust and had done so for a number of years without any concerns being raised. The Former Member resigned during the course of the investigation.

When weighing up these factors, the Ombudsman considered that making a referral was not proportionate. However, she noted that the decision would be held on record and should the Former Member return to office, it will be taken into account in any future cases which the Ombudsman may consider, should future complaints be received.

Complaint 202310160

That a member of a town council had failed to declare an interest in respect of a series of council meetings that considered a Trust.

Decision

The investigation found that in respect of a number of Council meetings, the Member did not declare an interest and took part in discussions and voting in matters to which she had a prejudicial interest. The Ombudsman considered that the Member showed contrition and expressed remorse if she was wrong not to have declared an interest which showed reflection and learning on the part of the Member. The Ombudsman considered, on balance, that a referral was not proportionate. However, the Ombudsman considered that the Member should undertake training on the Code with particular attention to personal and prejudicial interests. The Ombudsman recommended that the Member undertakes such training within 3 months.

Complaint 202501037 & 202501067

It was alleged that the Member failed to appropriately declare an interest in relation to her involvement with a subsidiary of a Trust. It was also alleged that the Member is the Chair of

the Trust and took part in a vote to appoint herself as Director. It was also alleged that the Member has, on several occasions, misused her position on the Trust to interfere with the Complainant's duties and another town council's duties to scrutinise the accounts of the subsidiary.

Decision

The Member confirmed that she had been appointed to the Trust as a member of the public, that her appointment as Trustee was unrelated to her roles as a Councillor, and that she has never referred to her position as Councillor in communication or in her role as Trustee. It appears that the Member therefore was acting in her personal and private capacity.

No evidence had been presented to suggest that the Member had misused her position.

Complaint 202502340

It was alleged that the Member breached the Code of Conduct ("the Code") by:

- Failing to declare an interest during Council meetings and providing false and misleading information about an alleged interest during a Council meeting
- Failing to provide a response to 6 questions provided by the Complainant.
- Social media comments.

Decision

Insufficient evidence was presented in respect of the Member's alleged failure to declare an interest appropriately, and the allegation had not been substantiated. The Ombudsman will not investigate unless there is reasonably strong evidence that the member concerned may have breached the Code. In addition, the Former Member had resigned from the Council and accordingly, the Ombudsman did not consider that any investigation would be proportionate in the public interest.

The Clerk, in her correspondence to the Complainant, outlined that the members of the Council felt that the correspondence had been dealt with during the Council meetings. In any event, the failure to respond to questions is not serious enough to amount to a breach of the Code. The alleged failure to respond may be considered rude or discourteous, but the Ombudsman was not persuaded that such conduct is so egregious to amount to a breach of the Code or warrant investigation in the public interest.

The comments on social media were dated following the Former Member's resignation and therefore were not made at a time when the Former Member was a councillor. Accordingly, this falls outside the scope of the Code.

Complaint 202502339

It was alleged that the Member breached the Code of Conduct by:

- Failing to declare an interest during Council meetings and providing false and misleading information about the alleged interest during a Council meeting.
- Failing to provide a response to 6 questions provided by the Complainant.
- Recording a meeting of the Council secretly and without permission.
- Posting comments on social media

Decision

No evidence had been provided to demonstrate that the Member disclosed information in relation to the matter in question and the Ombudsman will not investigate unless there is reasonably strong evidence that the Member may have breached the Code.

Screenshots provided show that the Member interacted on social media with the Member of the Public and her husband. The Member confirmed that he lives in a small village in which everyone knows each other. Without information regarding the closeness of the friendship, the Ombudsman could not robustly determine whether there is evidence suggestive of a breach of the Code by the Member. Furthermore, while the Member of the Public is documented as speaking during a Council meeting, there is no evidence that the Member subsequently took part in any vote or discussion

The Clerk, in her correspondence to the Complainant, outlined that the members of the Council felt that the correspondence had been dealt with during the Council meetings. In any event, the failure to respond to questions is not serious enough to amount to a breach of the Code. The alleged failure to respond may be considered rude or discourteous, but the Ombudsman was not persuaded that such conduct is so egregious to amount to a breach of the Code or warrant investigation in the public interest. Any agreement or disagreement with the way in which the Member deals with local issues is a matter for the local electorate to determine through the democratic process.

Minutes of the Council meeting, document that the matter of recording was discussed by Full Council and it was agreed that the Member would not record meetings going forward without the whole Council's consent and that they would "start afresh with a clean slate". In view of the minutes demonstrating that the matter was brought to the attention of the Member and considering that the issue was dealt with and resolved by the Council, the Ombudsman was not persuaded that an investigation would be proportionate or in the public interest. The Ombudsman was not persuaded that an isolated incident which has been dealt with by the Council represents sufficiently serious conduct to be suggestive of a breach of the Code by the Member.

The screenshot provided showed that the post was made by the Member on Facebook using his personal name and the Ombudsman could not see that there was any reference to his role as an elected member or to the Council.

The Ombudsman was not persuaded that the Member's comment was suggestive of a disreputable conduct under the Code, particularly considering the Member's right to freedom of expression. Under Article 10 of the European Convention of Human Rights, everyone has the right to freedom of expression. While the Member's post on social media and accompanying comment may have been crass or distasteful and may have caused offense to the Complainant, the Ombudsman was not persuaded that the Member's comments were sufficiently offensive or outrageous to be suggestive of a breach of the Code

MEETING	Standards Committee
DATE	8 June 2026
TITLE	Whistleblowing Policy and Procedure for Members
AUTHOR	Iwan Evans – Monitoring Officer
CABINET MEMBER	Clr Llio Owen

1. Why it needs scrutiny?

In order to ensure that the Whistleblowing Policy and Procedure for Elected Members is considered thoroughly and is placed on firm grounds before it is adopted at a Council meeting as an addition to the constitution.

2. What exactly needs scrutiny?

The Whistleblowing Policy and Procedure for Members.

3. Background/ Context of introducing the new Policy and Procedure

3.1 On 20th January 2026 the Cabinet adopted a new Whistleblowing Policy for Staff. As an amendment to the Constitution the Policy was reported on the Full Council on 5 March 2026. That policy is specific for the Council's employed staff and others in employment/volunteering positions and derives from the Public Interest Disclosure Act 1998 and consequently does not apply to Elected Members.

3.2 Therefore, it was acknowledged at the time that there was a need to consider a policy enabling Elected Members to also present, in confidence, concerns of the same nature as to what is included in a normal Whistleblowing Policy, i.e., matters that could be criminal, significant malpractice or gross inappropriate conduct, whether from a Member or an officer. However, it must also be highlighted that the Whistleblowing procedure for staff is based on employment legislation. It creates a framework of rights, protection and legal outcomes that are not reflected in the relationship between elected members and the Council.

3.3 When drawing up this type of Policy, it must be acknowledged that members come into contact with the Council for many reasons. This could be raising concerns on behalf of constituents, complaining about a Department or service's arrangements, or expressing discontent about the quality of the work of a specific team. This is a part of the Council's daily work, and it is dealt with under a range of arrangements and Protocols. These are matters that would not be a routine part of the dealings of staff and their employer or contractors. They are dealt with through the Council's routine arrangements. This is not what is covered here, but rather matters that are the cause of a more serious and grave concern.

3.4 There is also a need to outline what is in the Members' Code of Conduct and the requirements on members to report on specific matters. Therefore, it is a requirement under the Code for members to report to the Monitoring Officer if they are of the opinion that a member has breached the Code of Conduct. This is not optional and a member may be required to refer the matter to the Ombudsman. In addition, further provision within the Code of Conduct places a legal requirement on members who discover criminal behaviour in the Council's work to either report to the Council by means of a confidential reporting procedure or relevant enforcement agency. It is also emphasised that criminal behaviour within the scope of this may include a range of matters that could be criminal. For example, dishonesty, health and safety offences and matters such as attacks. Safeguarding matters are exempt as there is a specific procedure for reporting on such matters that would address the duty under the Code.

However, beyond this, there are instances where it is appropriate for Members to obtain assurance of confidentiality when highlighting specific gross misconduct.

3.5 Adopting this policy is an essential step to strengthen the culture of transparency and accountability, and it has been noted consistently as a high priority following the publication of the Child Practice Review Report: Our Bravery Brought Justice. Support from the Response Board is also to be adopted, reflecting a strong consensus across the organisation regarding its purpose and value.

4. Other arrangements for different types of concerns

4.1 As well as this Expressing Concerns (Whistleblowing) Policy and Procedure, several other clear pathways already exist by the Council for reporting on different types of concerns (e.g. safeguarding, fraud, or Member and Officer code of conduct issues). However, in some circumstances, it is essential to be able to protect the confidentiality of those making the allegations, in particular to encourage confidence to raise concerns, and ensure that sensitive information is handled appropriately.

4.2 In order to support Members and to ensure consistency, Appendix 2 provides a useful overview of different paths for enquiries, complaints or disclosing concerns. This brief overview is an attempt to include all different pathways in one useful place for Members, and it will be included in the Members' Handbook in the future. It will also be the basis of the induction training for new Members following the Local Government Election 2027.

4.3 Also see below a link to the full document of each of the processes highlighted on the overview in Appendix 2:

Type of 'Concern / Enquiry'	Relevant document:
Disclosing Serious Concerns / Behaviour	The Constitution (to be reviewed after the Council meeting on 02/07/2026)

Safeguarding	Polisi-Diogelu-Ionawr-2025-Cymraeg.pdf
Complaint about another Member's conduct	Adran-18---Cod-ymddygiad-aelodau.pdf
Fraud	Anti-fraud Strategy: Atodiad 1 - Strategaeth.pdf
Complaints about an Officer / Chief Officer	Member / Officers Relations Protocol Adran-21---Protocol-ar-gyfer-cysylltiadau-aelodau-a-swyddogion.pdf
Complaint about a Service on behalf of electors	Complaints Policy: Cyngor Gwynedd Concerns and Complaints Policy
Service request on behalf of electors	Member / Officers Relations Protocol Adran-21---Protocol-ar-gyfer-cysylltiadau-aelodau-a-swyddogion.pdf
General enquiry / request for information about Council services	Galw Gwynedd or direct contact with the service or information on the website Adran-21---Protocol-ar-gyfer-cysylltiadau-aelodau-a-swyddogion.pdf

5. Engagement

- 5.1 When drawing up the policy, discussions were held and input sought by the Member Enquiries Task Group, which had already discussed this procedure when looking at the general relations between Members and Officers. Engagement was also undertaken with all Members **and any comments received will be reported on orally at the meeting.**
- 5.2 In addition, consultation was also undertaken with the Protect Organisation, which is a charitable body specialising in whistleblowing matters under the act to identify opportunities to take advantage of their support. On the whole positive feedback was received for the Policy but with suggestions for adapting and strengthening some aspects. These changes are noted and underlined in the appendix. The only aspect where an amendment was not incorporated was in relation to the list of possible sources of behaviours that would be relevant to the Policy. This list has been included partly due to the specific requirements of the Code of Conduct and also to give context. However, the suggestion to extend the list to

include behaviours by the public and businesses as the source of concerns was incorporated in the draft.

6. Next Steps

After receiving the comments of the Scrutiny Committee, there will be a request for the Full Council to support adding the Policy to the Council's Constitution, on 2 July 2026.

Background Information

Education and Economy Scrutiny Committee 19 January 2026 [Agenda for Communities Scrutiny Committee on Thursday, 19 January 2026, 10:30am](#)

[Agenda for The Cabinet on Tuesday, 20th January, 2026, 1.00 pm](#)

Full Council 5 February 2026 [Agenda for The Council on Thursday, 5 February 2026, 1.30pm](#)

Full Council 5 March 2026 [Agenda for The Council on Thursday, 5 March 2026, 1.30pm](#)

Appendices

Appendix 1 - Elected Members' Whistleblowing Policy (draft)

Appendix 2 – Overview of the Members' Pathway for Reporting Concerns

Confidential Reporting (“Whistle Blowing”) Policy for Members

1 Introduction

- 1.1 Gwynedd Council as an organisation, the Elected Members and the Officers serving the Council, are committed to the highest standards of honesty, propriety and accountability in all aspects of the Council's functions.
- 1.2 The Council has adopted a Code of Conduct for Members and a Code of Conduct for Staff and is committed to upholding these behaviours in all aspects of its work.(In this document reference to "Member" or "Members" means anyone who is bound to the Code of Conduct for Members or other individuals co-opted by the Council to any committee or body)
- 1.3 The Council has adopted a Policy for staff in accordance with the provision of the Public Interest Disclosures Act 1998.
- 1.4 This document builds on the Council's confidential reporting procedure to provide a clear pathway for Members to be able to report on matters that may constitute criminal, serious malpractice or serious inappropriate behaviour. It is designed to provide clear guidance to any Members who may have concerns. Whistleblowing helps to protect staff and service-users, and we want to hear about any concerns you may have so action can be taken to resolve them.
- 1.5 Paragraph 18.3.6(B) of the Code of Conduct for Members provides that they must:
- “.....report, whether through your authority’s confidential reporting procedure or direct to the proper authority, any conduct by another member or anyone who works for, or on behalf of, your authority which you reasonably believe involves or is likely to involve criminal behaviour (which for the purposes of this paragraph does not include offences or behaviour capable of punishment by way of a fixed penalty).”
- 1.6 The purpose of this procedure is to provide the confidential reporting procedure referred to above and to provide clarity to Members on the process for raising such concerns within the Council.

2 Scope of this Procedure

- 2.1 This procedure is relevant to all Members.
- 2.2 This procedure applies to concerns about conduct by the following types of individuals (list not exhaustive):-
- (i) Members of the Council
 - (ii) Council Staff;

- (iii) Agency workers, consultants and contractors engaged by the Council;
- (iv) Volunteers who participate in the provision of services by the Council.
- (v) Members of the public and businesses in their engagement with the Council.

2.3 The Council has several other pathway processes that enable Members to submit day-to-day concerns about performance, policy, decisions etc and this procedure is not intended to replace these processes. To avoid any ambiguity this Procedure applies to :

- (i) Matters which may be of a criminal nature
- (ii) Significant malpractice
- (iii) Serious inappropriate behaviours
- (iv) Illegal activities

3 Matters to which this Procedure does not apply

3.1 This procedure will generally not apply in the following cases as they are already being or have been investigated or there are other procedures in place to raise concerns :-

- (i) Matters subject to a current or closed investigation (either internally or externally);
- (ii) Complaints arising out of a breach of the Protocol on Member/Officer Relations.
- (iii) Allegations that a member has breached the Councils Code of Conduct for Members
- (iv) Concerns about the safety and/or well-being of a person (child or adult) which should be referred in accordance with the Councils Corporate Safeguarding Policy

4 Confidentiality

4.1 Reports or referrals made under this procedure are treated by the Council as made in confidence and will not be made public (or communicated to other Members or officers) unless: required by law, required by procedures on investigating allegations, or in circumstances where this is necessary such as providing evidence or making a complaint to the appropriate investigating authority. This will be discussed with members on all occasions.

4.2 A Member who makes a report under this procedure will be expected to keep their report confidential and will ensure that any investigation is not impeded by disclosure of the report or complaint they have made.

5 Reporting Concerns

5.1 Conduct to which this procedure applies should be reported to the Council's Monitoring Officer who will decide how to take the matter further and conclude whether the matter in question is appropriate for this procedure or for another recognised process or procedure.

Appendix 1

- 5.2 If the concern relates to fraud or corruption then the Monitoring Officer will refer the matter to the Internal Audit Manager in the first instance.
- 5.3 Reports may be made orally or in writing. Written reports must be clearly marked as CONFIDENTIAL. You may use your Council e-mail or a personal e-mail to raise a concern.
- 5.4 In the event of a conflict of interest by the Monitoring Officer the matter should be referred to the Chief Executive
- 5.5 If there is a conflict of interest between the Chief Executive and the Monitoring Officer, then the matter should be referred to the Head of Corporate Services.
- 5.6 In an exceptional case where the Monitoring Officer, the Chief Executive and the Head of Corporate services have an interest, the matter may be brought to the attention of the Wales Audit Office in the first instance.
- 5.7 Depending on the circumstances of the case at hand, the Monitoring Officer (or in the case of 5.4, 5.5 and 5.6 the relevant officer) may arrange for an investigation to take place internally or refer the matter to an independent body or investigator in accordance with the normal propriety requirements. He or she may also advise a Member in relevant cases to refer the matter externally e.g. to the attention of the Police or the Public Services Ombudsman.
- 5.8 It is recognised that raising concerns about serious misconduct can be a difficult step for Members, and anyone using this policy will have access to independent support and advice through the Medra* and Protect** services, before, during, or after making a disclosure.

6 Action Following a Member's Report

- 6.1 Once the Monitoring Officer or other officer has received a report from a Member under this procedure, he will consider the matter and determine what, if any, further action is required. This may involve an investigation by an appropriate officer such as the Councils Audit Team or Health and Safety Team. They will acknowledge receipt and make initial contact with the Member within no later than 7 working days following the referral.
- 6.2 Alternatively, the Monitoring Officer may decide that the matter requires the involvement of the Police or Public Services Ombudsman for Wales or another body, regulator or law enforcement agency and may report the matter or direct the member to report the matter.
- 6.3 The Monitoring Officer may advise the reporting Member of the outcome of the investigation. However, this may not be possible in all cases. Depending on the nature of the matter giving rise to the concern, it might be necessary for further details of the investigation to remain confidential and as such to be withheld from the reporting Member. Or it may be in the hands of a separate

enforcement or regulatory body. In so far as appropriate this will be explained to the member.

7. Victimisation

7.1 If any Member feels they have been treated poorly by a member of staff because of making a disclosure, please inform the Monitoring Officer or any other of the listed officers .This can include negative treatment such as negative comments, ignoring or removing work, and refusing to co-operate with a Member because they have raised a concern. Such conduct is not acceptable and although the statutory protections do not apply to Members it is important that such conduct is brought to light and addressed.

Contacts

<u>Role</u>	<u>Name</u>	<u>e-mail</u>	<u>Telephone</u>
<u>Monitoring Officer</u>	<u>Iwan Evans</u>	<u>iwangdevans@gwynedd.llyw.cymru</u>	<u>07435741322</u>
<u>Chief Executive</u>	<u>Dafydd Gibbard</u>	<u>dafyddgibbard@gwynedd.llyw.cymru</u>	<u>01286 632001</u>
<u>Head of Corporate Services</u>	<u>Ian Jones</u>	<u>ianjones@gwynedd.llyw.cymru</u>	<u>07795823944</u>
<u>Audit Manager</u>	<u>Luned Fon Jones</u>	<u>lunedfonjones@gwynedd.llyw.cymru</u>	<u>01286 634687</u>

TO BE COMPLETED

Audit Wales

*Medra

Angen cadarnhau sut i gael mynediad

**Protect

"Protect runs a free, confidential legal advice line for those who have whistleblowing concerns."

Appendix 2: Overview of the Members' Enquiries and Reporting Pathways

Type of 'Concern / Enquiry'	e.g.	Reporting Procedure
Disclosing Serious/Criminal Behaviours or Concerns	Criminal behaviour disclosure in accordance with the requirement in the Code of Conduct; including corruption, fraud and offences such as health and safety	<p>New procedure to be submitted to the Full Council on 2 July 2026</p> <p>The Constitution</p> <p>(to be reviewed after the Council meeting on 02/07/2026)</p> <p>In accordance with the Members' Whistleblowing Policy (NEW)</p> <p>Report to the Monitoring Officer or in accordance with part 5.4-5.7 of the Procedure</p>
Safeguarding	<p>Physical, sexual, psychological, emotional or financial abuse</p> <p>Physical, sexual, psychological, emotional or financial neglect</p>	<p>In accordance with the Polisi-Diogelu-Ionawr-2025-Cymraeg.pdf</p> <p>namely</p> <p>Contact the Police (999) if a child or adult is at risk</p> <p>Contact Cyngor Gwynedd Social Services</p> <p>Safeguarding-Policy-January-2025-English.pdf</p>
Complaint about another Member's conduct	Bringing the post and the authority into disrepute, disrespect, abuse of position, misuse of the Authority's resources, breach of confidentiality, not drawing attention to breaches of the code.	<p>In accordance with:</p> <p>Section-18---Members-code-of-conduct.pdf</p> <p>Report to the Monitoring Officer</p>
Fraud	False representation; intentional failure to disclose information or fraud through abuse of position	<p>In accordance with the Code of Conduct and the Anti-fraud Strategy: Appendix 1 - Strategy.pdf</p> <p>Report to the Audit Manager</p>

Complaint about an Officer / Chief Officer	Being disrespectful towards a member, ignoring correspondence, breach of confidentiality, or acting contrary to the Members and Officers Protocol.	In accordance with Section-21---Protocol-on-member-and-officer-relations.pdf Report to the officer's line manager; arrangements for escalating to the Head of Department / Director if it is not resolved.
Complaint about the Chief Executive / Monitoring Officer	Conduct that is contrary to the Members and Officers Protocol, or breach of the Members' Code of Conduct.	In accordance with Section-21---Protocol-on-member-and-officer-relations.pdf
Complaint about a Service on behalf of electors	Waste collections regularly missed in an area, delay	In accordance with the Cyngor Gwynedd Concerns and Complaints Policy Informal Resolution by reporting to the relevant Manager / Head of Department. Submission of a Formal Complaint through the central complaints point of contact - Galw Gwynedd, website or complaints e-mail.
Service request on behalf of electors	Request for a new bin, request to replace a street lamp, reporting a pothole	Direct request through any medium of the members' choice, e.g., e-mail / phone the service directly, through Galw Gwynedd; through the public website; through the members' Self-service.
General enquiry / request for information about Council services	Asking what day the bin is being collected, advice on a planning application, Council tax requests	Contact via Galw Gwynedd or direct contact with the service or information on the website.

Committee:	The Standards Committee
Date:	8 June 2026
Title:	Allegations against members
Author:	Siôn Huws, Propriety and Elections Manager
Purpose:	For information

1. Background

The purpose of this report is to inform the Committee of the Ombudsman's decisions on formal complaints against members.

2. Decisions

2.1 Summaries of the decisions received from the Ombudsman are attached as an **Appendix 1**.

3. Recommendation

3.1 The Committee is asked to note the information.



**Decision issued under paragraph 69(2)
of the Local Government Act 2000
Case Number: 202507741
Complaint against Councillor XXX (“the Member”)
of XXXX Town Council (“the Council”)**

Summary of complaint

It was alleged by a member of the public (“the Complainant”) that the Member had used her position as a Councillor improperly in an attempt to intimidate the Complainant and interfere with their business.

How we decide whether to investigate

To decide whether to investigate a breach of the Code of Conduct (“the Code”), we apply a 2-stage test. First, we consider whether there is evidence to suggest that a breach of the Code may have occurred. Second, we consider whether it is in the public interest to investigate the matters complained about. We take into account a number of public interest factors such as:

- the seriousness of the alleged behaviour
- whether the member misused a position of trust or has sought to gain, for themselves or others, at public expense
- whether an investigation is required to maintain public confidence in elected members
- whether an investigation is proportionate in the circumstances or whether, if proven, a referral to a Standards Committee or the Adjudication Panel for Wales would be appropriate.

My Decision

(1) Whether there is evidence to suggest that there may have been breaches of the Code of Conduct

The Complainant did not specify which provisions of the Code they believed the Member to have breached and minimal information was provided to support the complaint. It may be helpful if I explained that the Ombudsman's powers to obtain information do not come into effect unless, and until, we have formally commenced an investigation and we will only do so when we have been shown sufficient direct evidence that a councillor's actions may have breached the Code and we consider that it is in the public interest for us to use our limited resources to investigate the matter. It is the Complainant's responsibility to provide the initial direct evidence to support their complaint.

An elected member using their position improperly to disadvantage a person, could be considered conduct capable of breaching the Code, however, minimal supporting information was provided to substantiate these allegations. Whilst the Complainant alleged the Member had made reports and negative comments about their business and had left abusive notes on their vehicle, no further evidence of these allegations or how they amounted to a breach of the Code was provided. The Complainant was given the opportunity to provide further information to support the complaint but did not respond.

The Ombudsman is unable to commence an investigation on assertions alone and will not investigate a complaint unless there is reasonably strong evidence to suggest that the member concerned has breached the Code. In this case, evidence was not provided to substantiate the complaint.

(2) Whether an investigation is required in the public interest

The conduct complained about does not meet the first stage of the test, as set out above, therefore, there is no need to consider the second stage of the test.

Outcome

The complaint should not be investigated.

Penderfyniad y Tîm Cod / Code Team Decision

a gymerwyd ar ran / taken on behalf of

Michelle Morris

Ombwdsmon Gwasanaethau Cyhoeddus / Public Services Ombudsman

20 February 2026



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Decision issued under paragraph 69(2)

of the Local Government Act 2000

Case Number: 202508392

Complaint against Councillor xxxx (“the Member”)

of xxxxxxxx Community Council (“the Council”)

Summary of complaint

It was alleged by a member of the public (“the Complainant”) that the Member had breached the Code of Conduct (“the Code”) by disclosing her identity to another person when this should have reasonably been considered confidential information.

How we decide whether to investigate

To decide whether to investigate a breach of the Code of Conduct (“the Code”), we apply a 2-stage test. First, we consider whether there is evidence to suggest that a breach of the Code may have occurred. Second, we consider whether it is in the public interest to investigate the matters complained about. We take into account a number of public interest factors such as:

- the seriousness of the alleged behaviour
- whether the member misused a position of trust or has sought to gain, for themselves or others, at public expense
- whether an investigation is required to maintain public confidence in elected members

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Rydym yn hapus i dderbyn ac
ymateb i ohebiaeth yn y Gymraeg.

ombudsman.wales
ask@ombudsman.wales
0300 790 0203
1 Ffordd yr Hen Gae, CF 35 5LJ
We are happy to accept and respond
to correspondence in Welsh.

- whether an investigation is proportionate in the circumstances or whether, if proven, a referral to a Standards Committee or the Adjudication Panel for Wales would be appropriate.

My Decision

(1) Whether there is evidence to suggest that there may have been breaches of the Code of Conduct.

The Complainant explained that at a Council meeting in February 2024 she provided key information to the Council related to an alleged fraudulent planning application. The Complainant said it had been agreed previously that the information would be presented to the Council ‘in camera’ and that this arrangement was put in place to protect her identity and personal safety due to the information she would be presenting. The Complainant then became aware, that at a Council meeting in August 2024, attended by the applicant of the planning application (“the applicant”), the applicant publicly identified her as the individual who provided the Council with the key information at the February 2024 meeting.

The Complainant believed the Member to be responsible for disclosing her identity to the applicant. She considered the Member had breached paragraph 5(a) of the Code which says a member must not disclose confidential information or information which should reasonably be regarded as being of a confidential nature.

Having considered the information presented, I am not persuaded that there is evidence that identifies the Member as the specific individual who disclosed the Complainant’s identity and the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned may have breached the Code.

In the absence of evidence demonstrating that the individual Member was responsible for the disclosure, I consider that any concerns of this nature would be more appropriately considered under the Council’s administrative or data protection processes as opposed to breaches of the Code. This does not imply any finding of fault on the part of the Council and there is no suggestion that any wrongdoing has occurred. This distinction is made solely to identify the appropriate process for consideration by the

Complainant. The Complainant also raised concerns that the Member has a personal and/or business link to the applicant. Evidence was not provided to substantiate this aspect of the complaint.

The Complainant was invited to provide additional information and whilst further information was received, no additional details were provided as to the nature of the personal and/or business link and the significance of this alleged link.

Finally, the Complainant raised concerns that the Member is using an email address which is also used by a family member. Insufficient evidence was provided to substantiate this aspect of the complaint and the Complainant did not explain why she considered this to be a breach of the Code. In any event, it appears to me that the matter complained of would not, in itself, amount to a breach of the Code. If there are concerns regarding the privacy or security implications of the Member's email address, these should be raised with, and considered by, the Council.

It has been noted that there is insufficient evidence to substantiate the complaints made. However, even if there were further evidence to challenge this position, the events referred to took place in 2024. Given the passage of time, it is also very unlikely the Ombudsman would undertake an investigation on the basis it would not be considered in the public interest to consider something that happened some time ago.

(2) Whether an investigation is required in the public interest

The conduct complained about does not meet the first stage of the test, as set out above, therefore, there is no need to consider the second stage of the test.

Outcome

The complaint should not be investigated.

Penderfyniad y Tîm Cod / Code Team Decision

a gymerwyd ar ran / taken on behalf of

Michelle Morris

Ombwdsmon Gwasanaethau Cyhoeddus / Public Services Ombudsman



**Ombwdsmon
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Decision issued under paragraph 69(2)

of the Local Government Act 2000

Case Number: 202508393

**Complaint against Councillor xxxx (“the Member”)
of xxxxxxxx Community Council (“the Council”)**

Summary of complaint

It was alleged by a member of the public (“the Complainant”) that the Member had breached the Code of Conduct (“the Code”) by disclosing her identity to another person when this should have reasonably been considered confidential information.

How we decide whether to investigate

To decide whether to investigate a breach of the Code of Conduct (“the Code”), we apply a 2-stage test. First, we consider whether there is evidence to suggest that a breach of the Code may have occurred. Second, we consider whether it is in the public interest to investigate the matters complained about. We take into account a number of public interest factors such as:

- the seriousness of the alleged behaviour
- whether the member misused a position of trust or has sought to gain, for themselves or others, at public expense
- whether an investigation is required to maintain public confidence in elected members
- whether an investigation is proportionate in the circumstances or whether, if proven, a referral to a Standards Committee or the Adjudication Panel for Wales would be appropriate.

My Decision

(1) Whether there is evidence to suggest that there may have been breaches of the Code of Conduct.

The Complainant explained that at a Council meeting in February 2024 she provided key information to the Council related to an alleged fraudulent planning application. The Complainant said it had been agreed previously that the information would be presented to the Council 'in camera' and that this arrangement was put in place to protect her identity and personal safety due to the information she would be presenting. The Complainant then became aware, that at a Council meeting in August 2024, attended by the applicant of the planning application ("the applicant"), the applicant publicly identified her as the individual who provided the Council with the key information at the February 2024 meeting.

The Complainant believed the Member to be responsible for disclosing her identity to the applicant. She considered the Member had breached paragraph 5(a) of the Code which says a member must not disclose confidential information or information which should reasonably be regarded as being of a confidential nature.

Having considered the information presented, I am not persuaded that there is evidence that identifies the Member as the specific individual who disclosed the Complainant's identity and the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned may have breached the Code.

In the absence of evidence demonstrating that the individual Member was responsible for the disclosure, I consider that any concerns of this nature would be more appropriately considered under the Council's administrative or data protection processes as opposed to breaches of the Code. This does not imply any finding of fault on the part of the Council and there is no suggestion that any wrongdoing has occurred. This distinction is made solely to identify the appropriate process for consideration by the Complainant.

The Complainant also raised concerns that the Member has a personal and/or business link to the applicant. Evidence was not provided to substantiate this aspect of the complaint. The Complainant was invited to provide additional information and whilst further information was received, no additional details were provided as to the nature of the personal and/or business link and the significance of this alleged link.

It has been noted that there is insufficient evidence to substantiate the complaints made. However, even if there were further evidence to challenge this position, the events referred to took place in 2024. Given the passage of time, it is also very unlikely the Ombudsman would undertake an investigation on the basis it would not be considered in the public interest to consider something that happened some time ago.

(2) Whether an investigation is required in the public interest

The conduct complained about does not meet the first stage of the test, as set out above, therefore, there is no need to consider the second stage of the test.

Outcome

The complaint should not be investigated.

Penderfyniad y Tîm Cod / Code Team Decision

a gymerwyd ar ran / taken on behalf of

Michelle Morris

Ombwdsmon Gwasanaethau Cyhoeddus / Public Services Ombudsman

14 April 2026



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**Penderfyniad a gyhoeddwyd o dan baragraff 69(2)
Deddf Llywodraeth Leol 2000
Rhif Achos: 202509749
Cwyn yn erbyn y Cyngorydd XXXX (“yr Aelod”)
o Gyngor XXXX (“y Cyngor”)**

Summary of complaint

It was alleged that the Member should have been precluded from standing for election due to being subject to a bankruptcy order.

How we decide whether to investigate

To decide whether to investigate a breach of the Code of Conduct (“the Code”), we apply a 2-stage test. First, we consider whether there is evidence to suggest that a breach of the Code may have occurred. Second, we consider whether it is in the public interest to investigate the matters complained about. We take into account a number of public interest factors such as:

- the seriousness of the alleged behaviour
- whether the member misused a position of trust or has sought to gain, for themselves or others, at public expense
- whether an investigation is required to maintain public confidence in elected members
- whether an investigation is proportionate in the circumstances or whether, if proven, a referral to a Standards Committee or the Adjudication Panel for Wales would be appropriate.

My Decision

(1) Whether there is evidence to suggest that there may have been breaches of the Code of Conduct.

Essentially, the Complainant alleged that the Member had committed electoral fraud by standing for election and failing to disclose his bankruptcy order. The Complainant provided a link to a Notice of Dividend (“the Notice”). The Notice appears to confirm that the Member was subject to a bankruptcy order in June 2009. The Notice shows the Member was later discharged from the proceedings but no further details are available. It may be helpful to explain that bankruptcy in itself is not an automatic disqualification from standing for election and this depends on the order that has been made. It is not the role of the Ombudsman however to consider whether the Member has committed electoral fraud. This is a matter the Complainant would need to report to the Police or raise with the Electoral Commission.

Paragraph 6(1)(a) of the Code says a member must not conduct themselves in a manner which could reasonably be regarded as bringing their office or authority into disrepute. The Ombudsman’s guidance outlines that conduct which results in a criminal conviction, especially if it involves dishonest behaviour may bring a Member’s Council into disrepute. In the absence of a conviction for electoral fraud however there is no evidence to suggest that the Member’s alleged actions were capable of bringing his role or his Council into disrepute.

It appears to me therefore that insufficient evidence has been provided to substantiate the complaint, and the Ombudsman will not investigate unless there is reasonably strong evidence to suggest that the member concerned may have breached the Code.

(2) Whether an investigation is required in the public interest

The conduct complained about does not meet the first stage of the test, as set out above, therefore, there is no need to consider the second stage of the test.

Outcome

The complaint should not be investigated.

Penderfyniad y Tîm Cod / Code Team Decision

a gymerwyd ar ran / taken on behalf of

Michelle Morris

Ombwdsmon Gwasanaethau Cyhoeddus / Public Services Ombudsman

11 March 2026

