

LONDON BOROUGH OF BRENT

**Meeting of the Standards Committee
11 January 2005**

Report from Borough Solicitor

For action

Wards affected:
All

Report Title: REVIEW OF THE REGISTER OF MEMBERS' INTERESTS AND THE REGISTER OF GIFTS AND HOSPITALITY

1.0 SUMMARY

This report sets out the findings of a recent audit of the Register of Members' Interests and the Register of Gifts and Hospitality. The audit was undertaken as part of the 2004-05 internal audit plan. The draft report from the auditors (attached at Appendix 1) identifies a number of non-compliances with the rules on registering interests and possibly some failures to register gifts and hospitality. It also recommends some steps to be taken to rectify non-compliances and improve the situation in the future. The Action Plan is attached at Appendix 2.

2.0 RECOMMENDATIONS

- 2.1 Members note the findings of the audit as set out in the draft audit report attached at Appendix 1 and the draft Action Plan attached at Appendix 2.
- 2.2 Members note that a final version of the report and action plan will be presented to members at or prior to the meeting when any variations from the draft versions will be highlighted.

- 2.3 Members agree that in respect of actions 2 and 13 in the Action Plan the Democratic Services Manager should check only that all boxes have been completed as it would not be possible for him to say whether the information provided was accurate or whether there are any omissions
- 2.4 Members agree that in respect of action 15 the Democratic Services Manager will ask members to check that their entries in the register are correct and will make any amendments notified to him prior to placing the register on line.
- 2.5 Members note that in respect of action 12 the comments of the Director of Finance on this recommended action will be presented to members at the meeting
- 2.6 Members agree to all other recommendations and request the Borough Solicitor to undertake those agree actions by the stated deadline.

3.0 DETAIL

3.1 The auditors recommended that:

- Members should be required to print their names on the undertaking to observe the code of conduct. The form should be changed. The Borough Solicitor endorses this recommendation.
- Once the form is returned to the Democratic Services Manager it should be checked to ensure all boxes have been completed and the member contacted if there are any omissions. The Borough Solicitor endorses this recommendation save that it is incumbent on the relevant member to check that the entries are accurate and up to date and not the Democratic Services Manager.
- A copy of the completed form should be returned to the member with a confirmatory note stating that this now constitutes the formal Register of Interests with a reminder that they are required to inform the Democratic Services Manager within 28 days of any change(s). The Borough Solicitor endorses this recommendation.
- An Amendment of Entry to Members' Interest Form should be enclosed to facilitate the notification of any changes. The Borough Solicitor endorses this recommendation.
- The Borough Solicitor's advice concerning declaration of membership of political parties should be re-issued to re-emphasise the guidance given by the Standards Board for England. The

Borough Solicitor endorses this recommendation and has already completed this action point.

- The Monitoring Officer should continue to remind members that they should update their declarations of interest for any changes that have taken place since their original / most recent declaration. The Borough Solicitor endorses this recommendation and has already completed this action point.
- The Democratic Services Manager should amend the Declarations at Meetings form so that the officer attending the meeting can record whether the member withdrew from the meeting. The Borough Solicitor endorses this recommendation.
- The Monitoring Officer should produce an Advice Note for members on the topic of Gifts and Hospitality in order to clarify the requirements of the Code of Conduct. This should include guidance that trivial gifts and hospitality need not be declared. The Borough Solicitor endorses this recommendation.
- The Monitoring Officer should abolish the local 'under £25' form and use only the official form, which allows for Members to enter a value and can therefore be used to enter an item below £25 if they so wish. The Borough Solicitor endorses this recommendation.
- The Monitoring Officer should produce a six-monthly report to the Standards Committee listing members and details of the gifts and hospitality that they have declared over the previous six months. The Borough Solicitor endorses this recommendation.
- BFS should provide guidance to members that they should declare all forms of membership of voluntary organisations that receive grants from the Council. The Director of Finance will provide comments on this recommendation at the meeting.
- The Democratic Services Manager or whoever receives the forms should check the Related Party Transactions declarations to ensure all boxes are completed and follow up with the member(s) concerned any omissions. The Borough Solicitor endorses this recommendation save that it should be incumbent on the relevant members to ensure accuracy rather than the democratic Services Manager.
- There should be further training sessions as planned and that all members who have not attended the training events should be encouraged to do so. The Borough Solicitor endorses this recommendation.

- The present inaccuracies in the Register of Members' Interests should be corrected prior to publication of the information on the Internet. The Borough Solicitor endorses this recommendation save that it will be for members rather than the Democratic Services Manager to check for accuracy.
- Members should be reminded again of the importance of notifying any changes to members' interests within the statutory 28-day period. The Borough Solicitor endorses this recommendation and this action point has already been completed.

3.0 FINANCIAL IMPLICATIONS

3.1 Beyond the cost already expended for the audit conducted, there are no direct financial implications arising from this report.

4.0 LEGAL IMPLICATIONS

4.1 Brent's Code of Conduct requires that members record their financial and other interests in a register which is open to public inspection. In addition the Local Government Act 2000 contains provisions for the maintenance of a Register of Member's Interest and Register of Member's Gifts and Hospitality. Members have a duty to notify the Monitoring Officer within 28 days of any changes or additions to their interests and the register is to be updated accordingly.

4.2 The initial findings show that many register entries appear not to be up to date. Until steps are taken to rectify gaps Members are in breach of the Brent Code of Conduct and are facing the risk of referral to the Standards Board for England. A failure to comply with the Code by registering all relevant interests, etc. could result in sanctions being imposed on the member such as suspension or disqualification.

5.0 DIVERSITY IMPLICATIONS

5.1 Officers believe that there are no specific diversity implications in this report.

6.0 BACKGROUND INFORMATION

Register of member Interests, Town Hall, Wembley
Register of Gifts and Hospitality, Town Hall, Wembley

If any person requires any further information on this report they are asked to contact the report author, Jane Alver, in Legal Services on telephone number 0208 937 1292.

APPENDIX 1



LONDON BOROUGH OF BRENT

Brent Financial Services

Audit & Investigations Team

INTERNAL AUDIT REPORT

REVIEW OF REGISTER OF MEMBERS' INTERESTS AND GIFTS AND HOSPITALITY

Report Status:	Draft
Project Auditor:	R. Bathard
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Date:	22 nd December 2004

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1. INTRODUCTION

The audit of the Register of Members' Interests and the Register of Gifts and Hospitality has been undertaken as part of the 2004-05 Internal Audit Plan.

Part III of the Local Government Act 2000 introduced a new ethical framework for local government. Every local authority is required to adopt a code of conduct that sets out the rules governing its members, including all elected, co-opted and independent members. Each code must include the provisions of the Model Code of Conduct approved by Parliament in November 2001 under section 50(1) of the Act. Authorities can choose to add their own local rules if they want to. The model code of conduct sets out procedures to safeguard against members abusing their position and misusing the authority's resources. Members are required to record their financial and other interests in a register which is open to public inspection. In addition there are rules governing disclosure of interests and withdrawal from any meetings which include business in which members have interests.

The Brent Council's Code of Conduct was adopted on 23rd May 2002. It is based on the model code with the additional inclusion of the 10 principles of conduct in public life contained in statutory instrument 2001/3575. These are: selflessness, honesty and integrity, objectivity, accountability, openness, personal judgement, respect for others, duty to uphold the law, stewardship, and leadership. The Council has also adopted two additional codes of practice to provide guidance to members specifically in relation to Planning and Licensing.

Section 5 of the Local Government and Housing Act 1989 requires the appointment of a monitoring officer, which in Brent is the Borough Solicitor. It is the monitoring officer's responsibility to report on any issues about the Council's legal powers, possible maladministration, impropriety and probity. The Local Government Act 2000 introduced new responsibilities for the monitoring officer which include:

- Establishing and maintaining a register of member interests and a register of member gifts and hospitality.
- Investigating misconduct of councillors.
- Promotion and maintenance of high standards of conduct through support to the Standards Committee.
- Advice to members on the interpretation of the Code of Conduct.

The work of the monitoring officer is reported to the Council's Standards Committee on an annual basis.

Under the Act, members must register certain interests by notifying the monitoring officer in writing of any interests they have which fall within the categories set out in the Code of Conduct. 'Registrable interests' are very detailed and for example cover jobs, name of employer, the name of any firm in which they are a partner and the name of any company of which they are a director, names of any corporate bodies in which they have a shareholding of

more than £25,000 or have a stake of more than one percent of the shares of the company.

Members have a duty to notify the monitoring officer of any changes or additions to their interests and the register is to be updated accordingly. The Register of Members Interests and Gifts and Hospitality must be available for public inspection.

In addition to declaring registrable interests, members are also required to notify the monitoring officer in writing of any gifts and hospitality worth more than £25 that are received in connection with their official duties as members. Such declarations are kept by the Democratic Services Manager on behalf of the monitoring officer.

The Council should have in place appropriate controls to promote compliance with the Code of Conduct and thereby minimise the potential risks to the reputation of the Council and its members of any failure to declare interests and/or gifts and hospitality which in any compromised the integrity of decisions taken on contracts, procurement, planning and other major issues.

2 SCOPE OF AUDIT

The main objectives of this review are to provide assurances that internal controls are sound and adequate and ensure compliance with statute, council and other relevant codes.

More specifically, it involves assessing whether the following control objectives have been met:

1. That the monitoring officer has put in place appropriate procedures for members to register their interests in line with statutory requirements, the Council's constitution and best practice guidance;
2. That all members have submitted the required forms to enable the Register of Interests, required by the Part III of the Local Government Act 2000 to be set up and made available for public inspection;
3. That there are appropriate arrangements to keep the register up-to-date;
4. That declarations by members are reviewed for reasonableness and checked against Council records.
5. That there is a mechanism for ensuring that all interests declared in Council meetings are recorded in the register of interests.
6. That members update the register to reflect any changes of circumstance;
7. That there are adequate arrangements for the maintenance of a gifts and hospitality register for members and it is kept up to date.

3 EXECUTIVE SUMMARY

A summary of the audit findings is provided below. Section 4 of this report sets out the findings and recommendations in detail.

3.1. Undertaking To Observe The Code Of Conduct

Members are not required to print their names on the declaration forms and most members' signatures were not legible.

3.2. Notification of Financial and Other Interests.

The standard of completion of this form varied and we noted some discrepancies:

- In one instance a member did not record the name of his employer or employment.
- In one instance a member declared a beneficial interest outside the Authority's area whereas the form requires only interests within the Borough to be declared.
- In two instances the descriptions of beneficial interests were insufficient to identify their location. One instance included just the first line of the address with no other details or postcode. The other instance was entered 'None other than my home' but the home address was not stated.
- The Standards Board for England recommends that members should register their membership of lobby groups and political parties and in July 2004 the Borough Solicitor issued this advice to members. To date only 15 of the 63 elected members have registered membership of a political party.

3.3 Member Declarations at Meetings

In some cases councillors made declarations of interests at meetings which they had not previously registered. It is a concern that members fail to declare their interests accurately either (1) upon on signing their initial 'Notification by the Members of Financial or other Interests form' or (2) when subsequent changes to their interests take place during their period of office.

3.4 Withdrawal From Meetings

The Code of Conduct requires members to withdraw from any meeting in which they have a prejudicial interest and Advice Note No.1 provides guidance to members. It would in our view improve accountability and the audit trail if the Democratic Services Officer attending a meeting recorded on the Members' Declaration at Meetings form whether the member(s) making any declaration withdrew from the meeting.

3.5 Gifts and Hospitality

There are few declarations of gifts and hospitality and some declarations are for trivial items. It may be that either (a) the acceptance of gifts and hospitality

is infrequent or (b) members do not declare gifts and hospitality that they receive.

3.6 Related Party Transactions

All members are required to complete a declaration of related party transactions. This is an external audit requirement and forms a note to the Council's Annual Accounts.

In our view Council members should declare even ordinary membership of any voluntary organisation receiving a grant from the Council. Not only a trusteeship or directorship but also ordinary membership of a voluntary organisation could create a conflict of interest and prejudice a Council decision to approve a grant in its favour.

All 63 members completed a return of related party transactions but we noted that some forms were incomplete or inaccurate. For example, some members did not print their names on the forms, some forms were not dated or wrongly dated. In one case the member had incorrectly completed both declarations A and B when only one can be relevant.

3.7 Training

The Monitoring Officer has issued Advice Notes and made presentations covering key issues relating to members interests, gifts and hospitality. One third of members attended the January 2004 Workshop. In light of the issues arising from this audit, it is evident that there is scope for improving the standard of recording members' interests and gifts and hospitality and some of the issues raised in this report could be addressed via further training for members. Those members who have not attended the training sessions would benefit from doing so.

3.8 Members' Interests On-Line

The Standards Committee agreed on 19th October 2004 to publish details of members' interests on the Council's website. We are concerned that the information to be published on the Internet should be accurate and up-to-date since the findings of this audit indicate that there are already inconsistencies in the existing registers.

4 DETAILED FINDINGS AND RECOMMENDATIONS

Control objective 4 in the “Scope of Audit” above, states that declarations by members should be reviewed for reasonableness and checked against Council records. The Monitoring Officer emphasised that it is incumbent upon members to ensure that their declarations of interests are accurate and kept-up-to-date. Whilst the Monitoring Officer would naturally be supportive and assist members in every way possible, it is the statutory responsibility of members to ensure that they declare their interests accurately and honestly.

Otherwise control objectives set out in the “Scope of Audit” are covered by the seven elements to the rules on registering interests:

1. Undertaking to observe the Brent Members’ Code of Conduct.
2. Notification by Member of a Local Authority of Financial and Other Interests.
3. Amendment of Entry to Members’ Interest.
4. Members’ declarations of personal interests at meetings.
5. Withdrawal from meetings if personal interests are prejudicial.
6. Notification by Member of a Local Authority of Receipt of Gift or Hospitality.
7. Declaration of Related Party Transactions.

The Democratic Services Manager maintains the above registers on behalf of the Monitoring Officer.

Apart from the Annual Return of Related Party Transactions (when members are informed of their obligations and sent a declaration form) it is incumbent on members to notify the Monitoring Officer of any changes in their interests that take place during their period of office.

4.1 Undertaking To Observe The Code Of Conduct

All 63 Council Members have signed declarations undertaking to observe the Code of Conduct. Also all Independent Member and Voting / Non-voting Co-opted Members have signed the undertaking.

The form does not require member to print their names adjacent to their signatures. We found that six members had printed their names but in many cases the signatures were not legible and neither the auditor nor the Democratic Services Officers could decipher most of the members’ names.

It is recommended that members should be required to print their names on the undertaking to observe the code of conduct. The form should be amended by the next Council election.

4.2 Notification by Members of Financial and Other Interests and Amendment of Entry to Members’ Interest.

All 63 elected members have returned a signed notification to the Democratic Services Manager. The "Notification by a Member of a Local Authority of Financial and Other Interest Form" has been adopted by the Council to record the details of each member. This is a copyright standard form.

We found that the standard of completion of the form varied and noted the following discrepancies and points of concern:

- Section 1(a) requires 'My Employment' or 'Business Carried on by me' and section (b) 'Name of Employer', 'Name(s) of firm(s) in which I am a Partner', 'Names of Company/ies of which I am a remunerated director.' In one instance section (a) had been completed with the entry 'Weekly Wages Only – Paid to me.' The name of the employer/ details of employment were not stated.
- Section 1(d) requires 'Name(s) of any corporate body having a place of business or land in the authority's area and in which I have a beneficial interest....' In one instance an interest outside the authority's area had been entered.
- Section 1(f) requests 'Address or other description (sufficient to identify the location) of any land in which I have a beneficial interest and which is in the area of the authority.' In two instances the information was not complete and was not sufficient to identify the location. One instance included just the first line of the address with no other details or postcode. The other instance was entered 'None other than my home.'
- Section 2(d) states 'I am a Member or hold a position of general control or management of the following body whose principal purposes include the influence of public opinion or policy'. This section has been subject to a recommendation from the Standards Board for England that was circulated to all members in Advice Note 1 issued by the Borough Solicitor (22nd July 2004). It states that since the Code of Conduct refers to a 'body whose principal purposes include the influence of public opinion or policies' it is recommended by the Standards Board that members should register their membership of lobby groups and political parties. To date only 15 of the 63 elected members have declared membership of a political party (12 initially, 3 on amendments). It is clear that the Borough Solicitor's advice issued in July 2004 has not had the desired effect.

It is recommended:

(a) Once forms are returned to the Democratic Services Manager they should be checked to ensure all boxes have been completed and the member contacted if there are any omissions.

(b) A copy of the completed form should be returned to the member with a confirmatory note stating that this now constitutes the formal register of interests with a reminder that they are required to inform the Democratic Services Manager within 28 days of any change(s).

(c) **An Amendment of Entry to Members' Interest Form should be enclosed to facilitate the notification of any changes.**

(d) **The Borough Solicitor's advice concerning declaration of membership of political parties should be re-issued to re-emphasise the guidance given by the Standards Board for England.**

4.3 Member Declarations at Meetings

The Democratic Services Manager maintains a list of declarations made by members at each committee meeting.

We reviewed the declarations made in the 12 months between October 2003 and September 2004 and cross referenced them to the Notification by Member of Financial and Other Interests forms.

Eight councillors have made Member Declarations at Council Meetings but not declared corresponding interests on their Notification by Member of Financial or Other Interests form or on an Amendment of Entry to Members' Interest form.

It is a concern that the registers do not match and that members fail to declare their interests accurately either (1) upon signing their initial 'Notification by the Members of Financial or other Interests form' or (2) subsequent changes to their interests during their period of office.

It is recommended that the Monitoring Officer should continue to remind members that they should update their declarations of interest for any changes that have taken place since their original / most recent declaration.

4.4 Withdrawal From Meetings

The Code of Conduct 12(1) requires members to withdraw from any meeting in which they have a prejudicial interest and Advice Note No.1 (Section 8) provides additional guidance to members. Any withdrawal from a meeting would be routinely recorded in the minutes.

It would in our view improve accountability and the audit trail if the Democratic Services Officer attending the meeting recorded on the bottom of the Members' Declaration at Meetings form whether the member making the declaration withdrew from meeting.

It is recommended that the Members' Declaration at Meetings form should be revised to provide for the Democratic Services Officer attending a meeting at which members declare an interest to record and certify whether members withdrew from the meeting.

4.5 Gifts and Hospitality

The Democratic Services Manager maintains two types of form. For gifts and hospitality in excess of £25 a standard form is used. A local form is used for voluntary declarations under £25. In our view the local form is unnecessary and could be discontinued. If members wish to voluntarily declare gifts and hospitality under £25 they can do so on the standard form, as it allows a value to be entered.

The present register shows the following declarations:

Values / Year	2002	2003	2004
Declarations above £25	1	1	Nil
Declarations below £25	11#	6+	2

Seven declarations related to the same luncheon reception.

+ In one case a member declared a bag of sweets and in another a cup of coffee.

There are few declarations of gifts and hospitality. It may be that either (a) the acceptance of gifts and hospitality is infrequent or (b) members do not declare the gifts and hospitality that they receive.

A good practice adopted by the GLA (Greater London Authority) is to issue a six monthly report to its Standards Committee on gifts and hospitality received by its members. The report consists of a list of members and details of gifts and hospitality that they have declared over the previous six months. In the same spirit of openness and transparency it would be possible for the Monitoring Officer to produce a similar report to the Brent Standards Committee based on the declarations made by members.

It is recommended that the Monitoring Officer should:

(a) Issue an Advice Note to remind members that they must declare gifts and hospitality above £25.

(b) Remind members that trivial gifts and hospitality need not be declared.

(b) Abolish the local under £25 form and use only the standard form.

(c) Produce a six-monthly report to the Standards Committee listing members and details of the gifts and hospitality that they have declared over the previous period.

4.6 Related Party Transactions

This is an annual return compiled by Brent Financial Services. It is an external audit requirement and forms a Note to the Annual Accounts. It is not part of the monitoring officer's responsibilities under the Local Government Act, although the returns are retained by the Democratic Services Manager.

All members are required to return a declaration form. If a member acts as a director or trustee in a personal capacity in a voluntary organisation i.e. in a

position not nominated by the Council and where the organisation receives a Council grant, members should declare details of their personal involvement. A nil return is required in cases where members are not involved with any voluntary organisation in a personal capacity. The advice given to members by Brent Financial Services is to make a declaration if in doubt and they will make a judgement on whether the information is published.

We checked a list of grants made to voluntary groups by the Council in 2003/04 to the Declaration of Related Party Transactions and to the Register of Members' Interests (Notification by Members of a Local Authority of Financial and Other Interests form) and found that:

- Two members had properly made declarations that were documented in the Note to the Annual Accounts 2003/04 showing the value of the voluntary organisations' grants.
- Two other members had declared in the Register of Members' Interests a personal involvement in voluntary groups. The two groups concerned had received grants from the Council but the two members did not make declarations on their Annual Related Party Transaction Declarations for Brent Financial Services to make a judgement on. In one case the member was press officer and in the other case a life member of the voluntary organisation. Neither member was in breach of the BFS guidance because they were not directors or trustees of the voluntary organisations.

In our view Council members should declare even ordinary membership of any voluntary organisation receiving a grant from the Council. Not only a trusteeship or directorship but also ordinary membership of a voluntary organisation could create a conflict of interest and prejudice a Council decision to approve a grant in its favour.

It is recommended that Brent Financial Services should change the guidance to Council members that they should declare all forms of membership of voluntary organisations that receive grants from the Council.

(2) All 63 members completed a return of related party transactions. We noted that:

- Six members had not printed their name in the designated area of the form.
- One form was not signed by a representative of the Democratic Services Manager.
- One form was wrongly dated 2006 instead of 2004.
- One form was signed by the member but not dated.
- One member had returned two forms, showing the same details but different dates.

- One member had incorrectly completed both declarations A and B when only one can be relevant.

It is recommended that the Democratic Services Manager should check the Related Party Transactions declarations to ensure that that all boxes are completed and follow up any omissions or discrepancies with the member(s) concerned.

4.7 Training

Many of the issues raised in this report could be addressed via training in regard to members. The Monitoring Officer has issued Advice Notes and made presentations covering key issues relating to members interests, gifts and hospitality. A full review of the Training/Networking was made in the Annual Report of the Monitoring Officer dated 7th July 2004. 21 Members (one third of the total) attended the January 2004 Workshop.

It is recommended that there should be further training sessions as planned by the Monitoring Officer and that all members who have not attended the training events should be encouraged to do so.

4.8 Members' Interests On-Line

The Borough Solicitor reported to the meeting of the Standards Committee on 19th October 2004 the background and legal implications of putting the register of members' interests on-line. The report included the revised guidance from the Standards Board for England and the implications of the Data Protection Act 1988 and recommended publishing the information on the Internet, subject to any reasonable concerns raised by members.

This process will be undertaken by Democratic Services and consist of two stages:

1. Extracting the information from the hard copy registers.
2. Circulating the information to members so they know in advance what will appear on their personal web pages on the Brent website. If they have any reasonable concerns these can be raised at this point.

We are concerned that the information to be published on the Internet should be accurate and up-to-date since the findings of this audit indicate that there are already inconsistencies in the existing register.

It is recommended that:

- (a) The present inaccuracies in the register of members' interests should be corrected prior to publication of the information on the Internet.**
- (b) Members should be reminded again of the importance of notifying any changes to their interests within the statutory 28-day period.**

ACTION PLAN – Members’ Interests, Gifts and Hospitality

No.	Report reference	Recommendation	Agreed/ Not Agreed	Service Comments/Response	Officer Responsible	Implementation Date
1	4.1	Members should be required to print their names on their undertaking to observe the code of conduct. The form should be changed by the next Council election.	Agreed		Borough Solicitor	1 st February 2005
2	4.2	The Democratic Services Manager should check all “Notification by Members of Financial and Other Interests” and “Amendment of Entry to Members’ Interest” forms completed and returned by members to ensure that all boxes have been completed and the member contacted if there are any omissions.	Partly agreed	The DSM can check that all boxes have been completed but will not know whether the information provided is accurate or whether any further information should have been provided. It is incumbent upon members to provide all relevant information and to ensure it is accurate and up to date.	Borough Solicitor	1 st February 2005
3	4.2	A copy of the completed forms should be returned to the member with a confirmatory note stating that this now constitutes the formal register of interests with a reminder that they are required to inform the Democratic Services Manager within 28 days of any change(s).	Agreed		Borough Solicitor	1 st February 2005

ACTION PLAN – Members’ Interests, Gifts and Hospitality

No.	Report reference	Recommendation	Agreed/ Not Agreed	Service Comments/Response	Officer Responsible	Implementation Date
4	4.2	An Amendment of Entry to Members’ Interest Form should be enclosed to facilitate the notification of any changes.	Agreed		Borough Solicitor	1 st February 2005
5	4.2	The Borough Solicitor’s advice concerning declaration of membership of political parties should be re-issued to re-emphasise the guidance given by the Standards Board for England.	Agreed		Borough Solicitor	Completed
6	4.3	The Monitoring Officer should continue to remind members that they should update their declarations of interest for any changes that have taken place since their original / most recent declaration.	Agreed		Borough Solicitor	Completed
7	4.4	The Members’ Declaration at Meetings form should be revised to provide for the Democratic Services Officer attending a meeting at which members declare an interest to record and certify whether	Agreed		Borough Solicitor	1 st February 2005

ACTION PLAN – Members’ Interests, Gifts and Hospitality

No.	Report reference	Recommendation	Agreed/ Not Agreed	Service Comments/Response	Officer Responsible	Implementation Date
		members withdrew from the meeting.				
8	4.5	The Monitoring Officer should issue an Advice Note to remind members that they must declare gifts and hospitality above £25.	Agreed		Borough Solicitor	1 st February 2005
9	4.5	The Monitoring Officer should remind members that trivial gifts and hospitality need not be declared.	Agreed		Borough Solicitor	1 st February 2005
10	4.5	The Monitoring Officer should abolish the local under £25 form and use only the official LGA form.	Agreed		Borough Solicitor	1 st February 2005
11	4.5	The Monitoring Officer should produce a six-monthly report to the Standards Committee listing members and details of the gifts and hospitality that they have declared over the previous period.	Agreed		Borough Solicitor	30 th June 2005

ACTION PLAN – Members’ Interests, Gifts and Hospitality

No.	Report reference	Recommendation	Agreed/ Not Agreed	Service Comments/Response	Officer Responsible	Implementation Date
12	4.6	Brent Financial Services should change the guidance to Council members that they should declare all forms of membership of voluntary organisations that receive grants from the Council.				
13	4.6	The Democratic Services Manager should check the Related Party Transactions declarations to ensure that that all boxes are completed and follow up any omissions or discrepancies with the member(s) concerned.	Partly agreed	The DSM can check that all boxes have been completed but will not know whether the information provided is accurate or whether any further information should have been provided. It is incumbent upon members to provide all relevant information and to ensure it is accurate.	Borough Solicitor	1 st February 2005
14	4.7	There should be further training sessions as planned by the Monitoring Officer and all members who have not yet attended the training events should be encouraged to do so.	Agreed		Borough Solicitor	30 th June 2005

ACTION PLAN – Members’ Interests, Gifts and Hospitality

No.	Report reference	Recommendation	Agreed/ Not Agreed	Service Comments/Response	Officer Responsible	Implementation Date
15	4.8	The present inaccuracies in the register of members’ interests should be corrected prior to publication of the information on the Internet.	Partly agreed	Officers will provide a copy of the register to each member so that they can be checked for accuracy before being placed on the on line register. It will not be possible for officers to say with any certainty whether the records are in fact accurate.	Borough Solicitor	1 st February 2005
16	4.8	The Monitoring Officer should remind members again of the importance of notifying any changes to their interests within the statutory 28-day period.	Agreed		Borough Solicitor	Completed