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Llywodraeth Cymru
Welsh Government

Welsh Government Consultation – Summary of Responses

Alleged Misconduct of Local Authority Senior Officers

Views on proposed changes arising from the
'Oldham Review'

April 2022

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
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Overview

This document provides a summary of the responses to the consultation on the recommendations, including potential changes to the Local Government (Standing Orders) (Wales) Regulations 2006, arising from the 'Oldham Review' on Alleged misconduct of local authority senior officers.

Action Required

This document is for information only.

Further information and Related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional Copies

This summary of responses and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Also available in Welsh at:

[Ymdrin â chamymddwyn honedig gan uwch-swyddogion awdurdodau lleol | LLYW.CYMRU](#)

Introduction

In October 2019 the Minister for Housing and Local Government commissioned a review into the arrangements for dealing with alleged misconduct of senior officers within local government in Wales. The aim of the review was to consider whether the current arrangements in Wales remain fit for purpose.

Following receipt of the final report the Welsh Government consulted on recommendations including potential changes to the Local Government (Standing Orders) (Wales) Regulations 2006.

Consultation

Views were invited as part of a twelve-week consultation, which began on 18 November 2020 and closed on 10 February 2021. The consultation was published on the Welsh Government's website. Respondents were able to submit their views and comments in written form, by email or online, and in Welsh or English.

A total of 26 responses were received. Seven written or e-mail responses and 19 responses via the online questionnaire. The respondent type is broken down as follows:

Respondent Type	
Member of the Public	18
Elected Member	1
Principal Council	1
Trade Union	1
Representative body / Professional Body or Association	1
Other	4

A list of respondents to the consultation is provided on page 17. Please note a number of respondents wished to remain anonymous, and this has been respected.

Summary of Responses

This document is a summary of the 26 responses received. The report does not aim to capture every point raised by respondents, instead drawing out key messages.

The consultation asked 15 questions as set out below.

Question 1: It is clear that “disciplinary action” should be used for issues of misconduct only. The regulations should only be concerned with the conduct of senior officers. Performance issues should be dealt with locally as agreed by performance related policies.

Do you agree or disagree?

There were 26 responses to this question, of which 13 agreed, eight disagreed, and five offered ‘other’ responses - which were broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

It is important not to confuse misconduct and performance issues, and the regulations and/or supporting guidance should provide sufficient clarity in order to achieve a consistent approach. Further clarification on, and examples of what constitutes ‘misconduct’ and ‘performance’ would be helpful as there could be overlap between the two.

Local authority processes must ensure all appropriate referral to disciplinary action is made, but guard against malicious accusations, and ensure those needing serious consideration are properly handled. One responder commented that ‘the procedures should only be used where there is a genuine disciplinary issue to address, and not misused to deal with scenarios where there was a change of political control in a local authority and senior officers disposed of because they did not suit the incoming administration’s policy direction’.

There were differing opinions on whether the regulations should only be concerned with the conduct of senior officers, some suggesting they should also apply to other heads of departments, and further that all staff within the local authority need to be treated equally.

There was a view that ‘performance’ and ‘minor issues’ should be dealt with locally, although some respondents felt that some degree of independence may be required for these investigations also, as there was an apparent lack of trust in some local authority areas that an internal investigation would be sufficiently impartial.

Question 2: Welsh Government believes local government should develop good practice guidance on performance management for senior officers. This would help reduce the confusion about what disciplinary action, using these regulations, can be used for.

Welsh Ministers would welcome your views on whether further clarity would be helpful in the regulations and their supporting documentation as to the circumstances in which they apply and if so, any suggested wording that could be considered.

There were 23 responses to this question of which 17 agreed further clarity would be helpful in the regulations and supporting documents, and six offered 'other' responses which were broader than the question, or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

There was general agreement that it would be helpful for local government to develop good practice guidance on performance management for senior officers, but with the caveat that operational standards across local authorities must be defined and not permit local variations. To ensure clarity and achieve consistency it would be helpful to set out in the regulations and supporting documents under what circumstances disciplinary action would apply. This to include a definition of the meaning of disciplinary action, and what was a minor issue. Another point raised was whether the term gross misconduct should replace misconduct. The use of plain language was also advocated.

One response suggested misconduct should relate to deliberate acts that were incapable of rectification if proven, as opposed to a senior officer's poor performance due to a lack of experience, and therefore capable of receiving additional training or re-training to overcome the problem.

Some concerns were expressed about the impartiality of local authorities in dealing with issues of performance management. One respondent stated that local authority performance management processes may verge on the 'old boys network' where senior managers look after each other. Another highlighted that where close communities exist and close contact between people in those communities it can make it difficult to deal with issues of discipline

There was also a suggestion that Welsh Government (WG) should set Key Performance Indicators (KPIs) for measuring local authority performance, and these could be included in the Standing Orders.

A reference to transparency and whistleblowing should be more prominent in the policy and supporting guidance should as far as possible mirror the wording in the policies covering all council staff.

Question 3: The DIP recommended sanction should be followed – yes/no. If you answered no why not and should there be local flexibility.

There were 23 responses to this question of which 20 agreed the DIP (Designated Independent Person) sanction should be followed, two disagreed, and one offered an ‘other’ response which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

Respondents suggested it is unreasonable for an independent person to be appointed, perform an independent investigation and then for the outcome to be ignored. A key matter was the need for there to be confidence in the process and in the outcomes of the process. In addition, the DIP would have had the benefit of hearing from witnesses and the chief officer and so their recommended sanctions would be evidence based. Alternative views were expressed about whether any provision should be made to deviate from the guidelines in exceptional circumstances, or whether there should be a legal obligation to pursue any penalty imposed under the DIP process.

One respondent highlighted that the use of a DIP raised the question over the purpose of councillors in the process if there was no alternative other than to accept the recommendation, and so this element of the procedure they felt needed further consideration.

For those who disagreed there was little explanation or alternative suggestions, however one respondent felt sanctions were not good enough.

Question 4: Should a non-legally qualified person be appointed in some cases – yes/no.

If yes, should they have access to independent legal advice?

There were 25 responses to this question, 12 agreed that in some cases a non-legally qualified person could carry out the DIP role, whilst 10 disagreed with this. Three offered an ‘other’ responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

There was strong support for independent investigations for misconduct cases although some divergence of views in terms of the appropriate DIP, and whether non-legally qualified DIPs should be appointed in some cases. Some concerns were voiced about the reason for considering the appointment of non-legally appointed DIPs. One respondent commented the premise for this suggestion by the Oldham Review would appear to relate to costs only. The respondent was not convinced that there would be cost savings when appointing non-legally qualified DIPs particularly where there was a need to also draw on independent legal advice. Others commented that costs should not be a deciding factor when appointing the DIP as this should be based on the facts and complexity of the allegations.

Where respondents were in favour of appointing non-legally qualified DIPs there was wide support for them to have access to independent legal advice. Even where respondents were not in favour of appointing non-legally qualified DIPs they agreed if this was to be allowed then they should have access to independent legal advice. In addition, it was suggested it would be helpful for them to have background/ understanding/ experience in local government and its practices and procedures, and ideally be familiar with legal requirements covering investigations and subsequent sanctions. Where non-legally qualified DIPs were to be appointed considerations around who would instruct the independent legal advisers would then need to be addressed.

Question 5: Welsh Government wishes to amend the regulations to enable the Investigating Committee to decide whether a legally qualified or non-legally qualified DIP be appointed in their preliminary stage of investigation. Do you agree?

There were 24 responses to this question of which 12 agreed that the investigating committee should be able to decide on whether to use a legally or non-legally appointed DIP in their preliminary stage of investigation. 10 disagreed with this, and two offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

There were opposing views on this proposal in almost equal numbers. Some stated there needed to be a policy position on this to ensure a consistent approach and 'ad hoc' decisions avoided.

There were concerns expressed that the investigating committee might not have relevant skills to determine whether a legally or non-legally qualified DIP should be appointed in each case. It was suggested investigating committees consist of elected members, so unlikely in all cases to possess highly developed investigatory skills or a detailed knowledge of the rules of evidence. In addition the need to maintain the integrity of the investigation elected members was raised and the need for transparency. It was suggested that, on that basis the investigation process should be concluded as soon as possible and where appropriate handed over to the DIP as soon as possible to undertake their work and present a cogent report and recommendations at the end of the investigation.

Some commented that in allowing an investigating committee to determine the appointment of a DIP that appointment may be amenable to political influence and stated that the DIP should be appointed either by agreement between the parties or by an independent body. Some suggested Welsh Government should maintain lists of DIPs and these could then be allocated on a 'taxi rank' basis. However, there was a view that case complexity alone should determine the DIP selection.

Key points raised in the responses included:

- The timing of the decision on whether a legal or non-legally qualified DIP should be appointed. In most cases this could not be undertaken until the committee had concluded its part in the process
- There is merit in allowing the investigating committee to decide on the DIP but they should seek HR and legal advice before making their decision.
- Selection of the DIP should be a randomised process unless the case is complex and has justification for high cost legally trained DIPs.
- Using the grievance committee of a neighbouring authority could be considered to undertake this role in the early stages.

Question 6: Welsh Government wants to amend regulations so that the DIP appointment, regardless of being legally qualified or not, be appointed on a “taxi rank basis” to ensure fairness and openness in the process.

Do you agree?

There were 23 responses to this question, 16 agreed with a ‘taxi rank’ appointment allocation process for DIPs, three disagreed with this, and four offered an ‘other’ responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

A large majority supported the DIP being appointed on a ‘taxi rank’ basis although a number qualified their responses, which included:

- This approach might help maintain a level of independence that a committee selection process may not.
- The process would remove any potential allegation of political interference.
- Objections to the DIP chosen and allocated under the ‘taxi rank’ basis should only be allowed for clear cogent reasons such as bias or inexperience in a complex area.
- It was felt necessary to establish more than one list of DIPs to call from, or sub divisions in one list for the non-legally qualified DIPs that also detailed their particular skill sets. Once these lists have been set up unless the alleged misconduct was on a national scale then a ‘taxi rank’ selection process should be used to ensure openness.
- Legally and non-legally qualified DIPs should be selected from a WG held list and local authorities select the next one available on the list, unless there are conflicts of interest, then it should be the next one on the ‘taxi rank’ principle.

People who disagreed with the ‘taxi rank’ method said the proposal centred on whether the DIP, legally qualified or not, was available at any given time, and for the complete timeframe of the process if called on through the ‘taxi rank’ system. This may lead to the appointment of non-legally qualified DIPs by default. It was emphasised that the DIP appointment should take into account the expertise of the

person appointed, not only the legal training but also competence in the area under investigation. The most suitable person should be appointed due to their relevant qualities in respect of the details of the investigation.

Question 7: The role of the Investigating Committee (IC) is to establish whether there is a case to answer and, if there is a case does it warrant further investigation.

The role of the IC is not to investigate the case in more depth. Do you agree?

There were 25 responses to this question of which 15 agreed the role of the IC was not to investigate the case in more depth once it was decided the case warranted further investigation. Four disagreed with this, and six offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

The respondents who agreed considered it important that the IC establish whether the case required further investigation, but the IC should not be seen to be accuser, judge and jury. The IC might not have the required skills, expertise or sufficient understanding of the law. There also needed to be some independent presence on the investigating committee to make sure a fair judgement was made.

The IC though should act as a filter for matters that do not warrant further investigation. However, they should have independent legal advice at that stage, not advice from within the council as it may overtly or more likely implicitly, be subject to political pressure. In one responders view many disciplinary charges brought under these provisions originate in officers being blamed by members.

There is a need to avoid delays and it was recognised that by having this preliminary stage some allegations might be disposed of quickly. Further guidance as to the nature of the role and the remit of the IC decision making would be welcome.

The IC needs to be provided with strict guidelines on their role so they do not stray beyond their terms of reference. This will avoid duplication and maintain the DIP role as a separate entity.

An alternative opinion was that there should be no limit to the committee investigation. In addition, that if the IC had already explored the case to make such a decision to proceed they may now have the expertise to progress the case and this would also speed up the process to avoid paying suspended staff longer term.

A few respondents cited a lack of trust in their local authority and questioned whether they could offer the independence required via an internal investigation, or even the IC itself.

Question 8: Do you agree or disagree that work undertaken by the investigation committee be shared with the DIP to avoid duplication of effort? Please explain your response.

There were 25 responses to this question of which 21 agreed to the sharing of information between the IC and the DIP, one disagreed, and three offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses:

Overall, it was considered the work of the IC should be shared with the DIP but only where the DIP was similarly empowered and adequately qualified to make approvals for further action. Others believed the detail of the initial investigation must be shared to avoid duplication and ensure all allegations or evidence is totally considered by the DIP. Respondents considered this to be an essential part of the disclosure and investigation process, and a report on the outcome of the IC stage should form part of the brief for the appointed DIP. There was a need for complete transparency and to ensure that the personnel on the IC were not also part of the DIP process.

The responder who did not agree with this question stated it was not appropriate for information to be shared, as the DIP needs to be independent.

Question 9: Welsh Government wishes to reiterate that the 2006 Regulations specifically provide the DIP with the power to take such steps as he/she thinks appropriate to keep the investigation progressing efficiently in the event of failure to comply with a timetable. Do you agree?

There were 25 responses to this question of which 21 agreed the DIP should have the power to keep the investigation progressing efficiently, one disagreed, and three offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

The majority of responses to this question agreed but some comments were subject to caveats. These included:

- It is important to ensure the DIP has the power to impose a timetable on any investigation to ensure fairness
- It would be difficult to set out fixed timetables as usually the very nature of matters resulting in the disciplining of senior officers involve complex and detailed issues. However, broad timetables should be agreed at the outset to enable more effective management of investigations
- Issues outside the control of the DIP (e.g. Covid) should permit extensions
- The DIP should have total control.
- Where possible DIPs should be legally qualified. Lawyers and judges are well qualified to know what would be an acceptable / unacceptable justification for an extension of time.

The one response, which was not supportive of this provision, stated they could not agree to decisions being made in the absence of the individual under investigation. There could be numerous legitimate reasons why an individual may not be available, and stipulations around a time limit may be discriminatory in action when, for example, an individual's mental health is taken into consideration. Every effort should be made to ensure participation at all stages.

Another respondent considered completing the task of investigating should be the goal, without worrying about timeline limitations.

Question 10: The investigation should not be delayed indefinitely. There is a suggestion that if the process has been delayed for a length of time because the person being investigated has not replied or appears to be stalling the process the DIP should be able to continue with the hearing in the absence of the person being investigated.

Do you agree?

There were 24 responses to this question of which 21 agreed the DIP should not delay the investigation in the case person being investigated not responding or delaying matters, no respondents disagreed, and three offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

There should be a process for allowing the person suitable opportunity to attend and communication to the person advising of what will happen if they do not attend or respond. It is essential that the process be fair not only to the person being investigated but also any other members of staff who may be involved in the investigation. Unnecessary delays may result in additional employment related issues.

A full investigation to establish why the process is being stalled should be undertaken. The investigation should continue in the absence of the individual but only following a period of notice, and that no mitigating medical evidence has been entered as to health and mental capacity. It was suggested that a four-week minimum notice period for responses should be appropriate except in exceptional circumstances such as Covid, where provision of virtual options should be considered. If the individual being investigated still refuses to participate then a copy of the draft DIP findings should be available for a fact check.

This process is undertaken in the criminal courts and is perfectly legal. If the individual fails to attend or submit acceptable information to the DIP to time this must not invalidate the process.

One respondent felt able to support the proposal subject to the party being investigated having a right of appeal to the Minister.

Question 11: If representation is made by external investigations to halt the DIP process then this should be considered. Representations from the individual being investigated should also be considered. However, the DIP should have an opportunity to ask for the decision on deferring the process to be reviewed on a timescale which should be considered for each individual case. The rationale for not continuing should be documented whatever decision is reached. Do you agree?

There were 25 responses to this question of which 19 agreed, four disagreed, and two offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

Overall, the view was that this depends on the nature of the matters being externally investigated. For example a request from the police would carry considerable weight, as would pending criminal hearings. Where an investigation could only be properly continued by external sources then a halt to the DIP investigation should be implemented. Nevertheless, caution was advised about whether continuing with the DIP process would compromise the external investigation. Under such circumstances, the DIP should be allowed to request a timescale review based on the merits of the case and the potential timescale being attached to an external investigation. This timescale though should be kept under review.

If a criminal investigation is in hand then due consideration should be given to a request by the senior officer to delay the proceedings so that he/she is not required to answer questions or provide statements that may compromise their defence in any criminal proceedings.

There was also a view that if the investigating committee has submitted the case to the DIP along with all supporting documentation then the matter must proceed. If representations were made from an external investigation, or indeed the individual being investigated then the DIP must simply consider this but not halt the investigation.

There was a consensus that anything interrupting a legal process must be recorded both in the interests of justice and transparency and fully documented.

Question 12 - Changes in the legislation are being looked at to ensure that local authority standing orders do not contradict other rules and regulations the local authority have to take into account. In the first instance the model constitution will be checked to see there is no conflict. Consideration of further guidance is also being looked at. Do you agree with this approach?

There were 21 responses to this question of which 16 agreed with the above approach, one disagreed, five no responses and four offered an 'other' responses, which was broader than the question or did not specifically respond to the question posed but provided helpful views.

Key messages from responses

Respondents agreed it would be helpful if there were a proper and satisfactory interaction between the Standing Orders, Financial Regulations and Contractual Terms for the Model Constitution to reduce or avoid conflicts and areas of arguable employment conditions. There was a need to ensure standing orders did not conflict with terms and conditions of contracts.

One respondent stated his understanding was that the WG, WLGA and the Wales Monitoring Officer Group of LLG (Lawyers in Government) had already concluded that the model constitution was in need of review. The current model was originally a revision of the first such consultation proposed under the Local Government Act 2000. This revision was promoted by the Monitoring Officer in conjunction with WG, and WLGA. This revised model has been a very successful tool used in most principal councils in Wales and this strong collaboration should be used again.

It was highlighted that the senior officers must be protected: a stable structure of rules must be established for these officers. Legal rules to which they have to abide, regardless of which authority they work for.

An alternative view was that the standing orders should prevail.

Question 13: We would like to know your views on the effects that consulting on the review of the arrangements for dealing with alleged misconduct of senior officers in local authorities (Oldham Review) would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.

What effects do you think there would be? Could positive effects be increased, or negative effects be mitigated?

There were 19 responses to this question. These were all free text responses.

Key messages from responses

The general view was that any language preferences would not lead to any beneficial effect increase, or negative effect mitigation. There should be no difference in a case being heard in Welsh or English. Costs of translation may apply, and there may be an issue if someone wanted to discuss in a language of choice where translation was not available. The most important factor here was dealing with misconduct, and, it is the standard and outcome of the investigation that is essential.

Some respondents acknowledged that the proposals set out in the consultation paper would already have been subject to an equality and Welsh language impact assessment. Further consideration would need to be completed at the level of each local authority in accordance with local protocols and standards. However, all local authorities have duties to work bilingually so respondents did not see the consultation would affect the Welsh language. In addition, both complainants and the subject of the investigation were already protected by Welsh statute to be able to conduct their case

and be heard in Welsh. Where local authority officers and members state Welsh is their preferred language then to carry out reviews in English would be inappropriate.

It would however be important to ensure that any DIP has both the appropriate legal and non-legal skills and linguistic skills necessary to discharge the DIP role. Where the investigation is conducted in Welsh there should be a translation into English for those whose first language is not Welsh. There may be an issue if a Welsh speaking DIP was not be available on the 'taxi rank' basis, however another view was that the DIP should be the best person for the role not merely someone who speaks a particular language.

A further response pointed to the current practice in Magistrates courts, which could be used in the above situations and felt there was no need to re-invent the wheel.

Question 14: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably than the English language.

There were 19 responses to this question. These were all free text responses but five of the 19 referred to their earlier comments without adding anything extra.

Key messages from responses

In the main, responses in respect of this question was to ensure both languages have equal status in any proceedings and the use of translation services from language of choice (Welsh/English) to the other language (English/Welsh) and vice versa were available. Others felt the lists of legally/ non-legally qualified DIPs should be available in both Welsh and English, and that DIPs should be encouraged to learn Welsh. Another suggesting that it may be worth considering moving toward Welsh by default, with the option to select English.

However, there was a comment that protection of the Welsh language should be dealt with within the current Welsh language policy Act and not form part of the misconduct of senior officers. Another respondent had little time for the Welsh language aspects of this process.

Question 15: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space below to report them:

There were 15 free text responses to this question.

A summary of these responses, where the issues have not already been referenced above, is set out below:

- Welsh Government (WG) could provide legal advice for non-legally qualified DIPs.

- The complaints procedure, including Stage 2 and referral to the Ombudsman are not fit for purpose at neither the local nor the national level. WG could do more to ensure that the complaints procedure is free from interference by both senior managers and senior officers within local government authorities.
- All members of the local authority workforce irrespective of their position within the structure should be treated fairly. Matters that have been referred to a DIP for independent consideration can be time consuming and throughout the period of the investigation, the individuals in question remain on full pay, which in the case of senior officers can be a significant sum. When we compare this to the rest of the workforce, it is clear there is an inequality in the treatment of staff dependent on status.
- There should be clarity as to whether an officer can accept a disciplinary sanction without having to go through the DIP process. It would have been helpful if the views of the LLG had been sought at the outset, and a representative included on the original panel, as Monitoring Officers are significantly involved in such matters.
- There should be reference made to accommodate those with special needs.
- It is time that that the processes and service that deals with misconduct are given teeth and that the punishment for those found guilty to be dealt with in a much more severe way.
- The complainant(s) must by regulations be permitted to fully participate in the investigation regardless of whether or not the subject of the complaint engages in the process. 'Appropriate persons' must be defined as any person or persons who are neither the subject of the complaint nor the complainant(s). The 2006 Regulations are silent on the matter of costs and from whom they can be sought. This needs rectifying.
- Time and again short comings of local authorities have been highlighted and this damages public perception of fairness and transparency, 'special measures' means the local authority cannot be trusted to get its own house in order, local authorities should be overseen by WG to stop the situation getting that far.
- These regulations are designed to deal with the alleged misconduct of very senior officers in local government which are defined as the Head of Paid Services (The Chief Executive), The Chief Finance Officer and the Monitoring Officer. The Advisory Panel, however, had representatives of two bodies representing Chief Executives (namely ALACE and SOLACE) but no one from CIPFA or LLG, the professional bodies who specifically represent Finance Officers and Monitoring Officers respectively. I do think it remiss not to have included representatives of all potential targets of this legislation. I know it has to be a manageable number but two more on the Panel would have hardly been overwhelming.

- The 'taxi rank' service will work better if north Wales uses south Wales personnel and vice versa. This would mean there would be less chance of influence from persons who may have a conflict of interest. Also the need to be neutral no single party to have a majority, in fact I would welcome every political party having a single representative, not just political balance.
- Many people within my local authority, including councillors themselves, have been mistreated (bullied, harassed, attacked) by senior management. These people have been allowed to continue to act and serve as officers without any scrutiny or investigation. Their actions have had a life-changing effect on several people, even local councillors themselves. Has any system from WG questioned the councillors?
- If I want to complain about superiors, I have to turn to the Ombudsman. This is a ridiculous process as the complaint is referred immediately to the council/ officer concerned. It is time for ordinary people to be protected from the actions of the senior officers.
- The people of the whole country have not been informed of the opportunity to respond to this consultation: this consultation has not been adequately advertised.

Next steps

The Minister for Finance and Local Government is committed to making the changes recommended by the 'Oldham Review', supported by the Oldham Review working group, and the respondents to this consultation. Legislation will be brought forward during the sixth Senedd.

List of Respondents

- City and County of Swansea Council
- David Daycock
- Joan & John Filce
- Karen Medhurst
- Mark Thomson
- Neil McKenzie
- Trevor Coxon
- Unison Cymru Wales
- Welsh Local Government Association (WLGA)

17 respondents wished to remain anonymous.