



The Councillors' Code of Conduct. Consultation on possible amendments of provisions on conflicts of interest: Analysis of responses



PUBLIC SERVICES AND GOVERNMENT

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Executive summary

Introduction

1. Between 12 December 2016 and 20 March 2017, the Scottish Government undertook a public consultation on making amendments to sections 5 and 7 of the Councillors' Code of Conduct. This report presents an analysis of the responses received.
2. Section 1 of the Ethical Standards in Public Life etc (Scotland) Act 2000 requires the Scottish Ministers to issue a code of conduct for councillors. All local authority councillors in Scotland are obliged to comply with the Code and with any guidance on the Code issued by the Standards Commission for Scotland. The Code prevents a councillor from taking part in Council meetings and sit on the board of an external body where there might be a conflict of interest. Exclusions to this can apply where the councillor has been appointed to the board or approved by their Council, but this exclusion does not currently apply in quasi-judicial or regulatory matters¹. The proposal is to make amendments to extend the exclusions to also cover quasi-judicial or regulatory matters, limited in application to Regional Transport Partnerships or to apply to all public bodies.
3. The purpose of the consultation was to seek views on whether such changes should be made, and if so what form changes should take. A total of 38 responses were received from a mix of local authorities; Regional Transport Partnerships; other public bodies and individuals. It is important to note that, given the self-selected nature of the respondents, the views presented here should not be seen as representative of the views of the wider population.

Level of agreement with making an amendment to the Code in respect of RTPs

4. Thirty seven of the 38 respondents answered question 1, with local authority respondents (LAs) and Regional Transport Partnerships (RTPs) tending to be more in favour of an amendment being made. Individuals were more mixed in their response.
5. Although not specifically asked about, a couple of respondents took the opportunity elsewhere to comment on why there should be an amendment. One argument was that decision making was based on different information at an RTP level compared to Council meetings. The other was that the current situation ran the risk of excluding people from RTP board meetings such that the boards did not have the required number of members to proceed (inquorate).

¹ Applications to the local authority for a licence, a consent or an approval, making an objection or representation or has a material interest concerning such a licence, consent or approval or is the subject of a statutory order of a regulatory nature, made, or proposed to be made, by the local authority.

Suggestions on how the amendment should be worded from those who agreed

6. Of those who agreed to the amendment, there were three overall types of approach:
 - Those that agreed with introducing the extended specific inclusion with no further caveats beyond ensuring that declarations of conflicts of interests were retained.
 - Those that agreed, but with the caveat that councillors could only be involved in Council discussions and decision making if they had not been present at RTP meetings on the subject or been involved in preparing an RTP representation.
 - Finally, there were those that stipulated that councillor participation in Council discussion and decision making depended on the level of RTP interest. In other words they could not take part if the RTP had actually made a direct application, comment or objection, but they could if the RTP had a general but not direct 'material' interest.
7. The five local authorities who provided comments all fell into the second camp, supporting use of similar wording to that of the Cairngorm Park National Authority (CPNA) which has the extended exclusion but stipulates that councillors declare their interests and absent themselves where the councillor has actually participated in the RTP's decision making or attended any meeting at which the matter has been discussed.
8. One slight variation was to suggest that a councillor could take part in discussions, thus fulfilling their representative role but not have any involvement in decision making so ensuring decisions are impartial.
9. The Standards Commission identified flaws with adopting the CPNA approach and argued for granting a specific exclusion in respect of RTPs to apply to all quasi-judicial and regulatory matters but with the same caveats as currently apply to other bodies covered by the specific exclusion at paragraph 5.18(2)(i). However, they also recognised challenges with this suggestion too and that the bottom line was that a councillor would still have to withdraw where direct 'material' interests were in conflict.

Reasons for disagreeing with an amendment to the Code in respect of RTPs

10. The main arguments from individuals centred on concerns about councillors being bribed for votes with an impact on impartial decision making. Also, there was concern that the impact on perceptions of trust in councillors would be at risk of being further undermined.
11. Opposition from some of the local authorities and one of the public bodies also reinforced the concern around undermining public trust in councillor impartiality. They also indicated that they felt that any amendments were unnecessary as they had not experienced problems in applying the code and believed that each situation should be judged on its own merits.

Level of support for whether an amendment should apply to all public bodies, not just RTPs

12. A total of 24 respondents provided a response to question 4. Fifteen were in favour of extending the amendment to all public bodies and 9 were against. All 8 individuals in favour of an amendment in relation to RTPs also favoured this being extended to all public bodies. Patterns for the other respondent types were more mixed.

Reasons for disagreeing with an amendment to the Code in respect of all public bodies

13. The main objection to extending the amendment was on the basis of concern about reducing public trust in Council decision making and making it open to fraud. It was also thought to go beyond the measures necessary to fix the current perceived issue and it was reiterated that such issues should be decided on a case by case basis at a local level rather than a change to the Code, and that it was possible to operate effectively with the Code as currently worded.

Additional comments or suggestions about the provisions of the Code on declarations of interest as regards councillors who are also members of other bodies

14. Under the final open question of the consultation, respondents expressed a range of opinions, from those who felt there should be some degree of trust in councillors and that the Code and declarations of interest should not of themselves hinder carrying out of Council business and bar membership of other bodies, to those that were very clear that conflicts of interest should prevent involvement in membership and/or decision making and records of conflicts of interest should be wide ranging to include historical interests, interests of family members, membership of all organisations (public, private etc).
15. The opportunity was taken by a number of respondents to suggest the Scottish Government undertake a wider review of the Code. This included calls for making the code simpler and more 'user-friendly'. It was also emphasised that any amendments to the Code must be done with the aim of maintaining public confidence in impartial decision making as well as be supportive to Councils in conducting their business as efficiently and openly as possible.

1. Introduction

- 1.1 This report presents the findings of an analysis of written responses to a Scottish Government consultation on making amendments to sections 5 and 7 of the Councillors' Code of Conduct. The consultation was published on 12 December 2016 and ran until 20 March 2017.²

Background

- 1.2 Section 1 of the Ethical Standards in Public Life etc (Scotland) Act 2000 requires the Scottish Ministers to issue a code of conduct for councillors. The aim of the Code is to set out clearly and openly the standards that councillors must comply with when carrying out their Council duties. All local authority councillors in Scotland are obliged to comply with the Code and with any guidance on the Code issued by the Standards Commission for Scotland. The current version of the Code was issued in 2010. The current Guidance was issued in 2015.
- 1.3 The Scottish Government has been asked to consider making changes to the Code to address a specific issue relating to Sections 5 and 7 on declarations of interest in connection with quasi-judicial or regulatory matters³. The purpose of the consultation was to seek views on whether such changes should be made, and if so what form changes should take.

About the consultation and analysis

- 1.4 The consultation contained six questions, two closed (tick-box) questions and four open questions which invited expanded comment. The questions are summarised in ANNEX 1.
- 1.5 Both quantitative and qualitative analysis were undertaken in relation to the responses received, with the emphasis on exploring the range of views of respondents as presented in the qualitative comments submitted.
- 1.6 The analysis in this report is based on the responses submitted to the consultation. It is important to note that, given the self-selected nature of the respondents, the views presented here should not be seen as representative of the views of the wider population.

² <https://consult.scotland.gov.uk/local-government-policy/councillor-code-of-conduct-amendment/>

³ Applications to the local authority for a licence, a consent or an approval, making an objection or representation or has a material interest concerning such a licence, consent or approval or is the subject of a statutory order of a regulatory nature, made, or proposed to be made, by the local authority.

2. Consultation respondents

- 2.1 A total of 38 submissions were received. All were submitted through the Scottish Government's online consultation hub.
- 2.2 There were an equal number of responses submitted by organisational respondents compared to individuals (19 each). Organisational respondents were primarily from local authorities (LAs) or Regional Transport Partnerships (RTPs), see Table 2.1. A list of the respondents to the consultation is included at ANNEX 2.

Table 2.1: Number and type of respondent

Respondent type	n	%
Statutory Regional Transport Partnerships	6	16%
Local Authorities	9	24%
Other organisations - Public Bodies (3) and 1 Local Authority licensing board	4	11%
Individuals	19	50%
Total	38	100%

3. Should the Councillors' Code of Conduct be amended?

- 3.1 The consultation document explained how Section 5 of the Councillors' Code of Conduct requires a councillor to declare an interest in a matter (financial or non-financial, including membership or holding office in an external public body) and not take part in discussion or decision making by their Council of that matter where a member of the public, knowing of the interest, would reasonably regard the interest as so significant that it is likely to prejudice the councillor's discussion or decision making (the "objective test").
- 3.2 Exemptions can apply where the councillor's membership of an external body has been approved or actually made by their local Council, however, not in the case of a quasi-judicial or regulatory matter where the external body in question is applying to the local authority for a licence, a consent or an approval, is making an objection or representation or has a material interest. Or such a licence, consent or approval is the subject of a statutory order of a regulatory nature, made, or proposed to be made, by the local authority.
- 3.3 This has had implications for the operation of at least one of the Regional Transport Partnerships (RTPs)⁴. As part of its role, they comment on major planning matters that may affect transport in their region. The consideration of such matters by the relevant Council is a quasi-judicial matter in terms of the Councillors' Code of Conduct and thus there is an issue with councillors who are also nominated or appointed by their councils to be members of RTPs who then, according to the current Code, should not take part in their Council's discussion of or taking decisions on quasi-judicial or regulatory matters in which that body has an interest.
- 3.4 It has been argued this impacts the ability of partnership bodies, such as RTPs, to influence Council decisions on important issues – for instance, most major planning applications will have potential transport implications. Also it may deter councillors from membership of outside bodies which in turn could reduce the ability of such bodies to properly perform their functions. It may also be more challenging to comply with relevant statutory requirements for the membership of such bodies.
- 3.5 The proposal set out was to amend the Councillors' Code of Conduct so that councillors who are appointed or nominated by their councils to be members of

⁴ There are seven RTPs set up across Scotland under the Transport (Scotland) Act 2005 to provide a coordinated approach to transport planning and delivery between different local authority areas. Under the 2005 Act, their Boards are made up of councillors from the councils in each relevant area as well as non-councillor members appointed by the Scottish Ministers.

an outside body would not be prevented from taking part in their Council's discussion of a matter of a quasi-judicial or regulatory nature in which that other body had an interest solely because of their membership of that body. Declaration of conflict of interest would still be required.

- 3.6 Question 1 asked respondents if they agreed or disagreed that the Councillors' Code of Conduct be amended as proposed. Question 2 then asked how the amendment should be worded (if agreed), and Question 3 asked for an explanation if a respondent disagreed with making an amendment.

Level of agreement with making an amendment to the Code in respect of RTPs

- 3.7 Thirty seven of the 38 respondents answered question 1, see Table 3.1, with local authority respondents (LAs) and Regional Transport Partnerships (RTPs) tending to be more in favour of an amendment. Individuals tended to be more mixed in their response.

Table 3.1: Responses to question one by respondent type

	Agree	Disagree	Non response
Statutory Regional Transport Partnerships	5	0	1
Local Authorities	6	3	0
Other organisations - Public Bodies (3) and 1 Local Authority licensing board	2	1	1
Individuals	8	11	0
Total	21	15	2

- 3.8 Although no specific question asked for views on why there should be an amendment in respect of RTPs, respondents took the opportunity to provide relevant comments under question 6 (final comment box). One justification was that decision making was based on different information at an RTP level compared to Council meetings:

“SWestrans is concerned with matters of a strategic level and members of the Board who are councillors would not have been presented with the same level of information or detail that a councillor would consider as part of a Council's planning committee. Therefore, it is entirely reasonable that there should be an exclusion for RTPs on these matters as the decisions being asked are not the same.”

- 3.9 Another RTP felt that not having the exclusion could lead to unacceptable levels of representation on RTP boards for important decisions where councillors had to absent themselves, particularly where the RTP included a relatively small number of local authorities. However, the same RTP did indicate that the exclusion should not apply where the RTP was making a direct application or representation or vice versa if a decision of a statutory nature was being made by the local authority directly relating to the RTP.

Suggestions on how the amendment should be worded from those who agreed

- 3.10 Of those who agreed that the specific exclusion should extend to cover quasi-judicial and regulatory matters, there were some slight differences in overall approach with respondents falling into one of three camps:
- Those that agreed with introducing the extended specific inclusion with no further caveats beyond ensuring that declarations of conflicts of interests were retained.
 - Those that agreed, but with the caveat that councillors could only be involved in Council discussions and decision making if they had not been present at RTP meetings on the subject or been involved in preparing an RTP representation.
 - Finally, there were those that stipulated that councillor participation in Council discussion and decision making depended on the level of RTP interest. In other words they could not take part if the RTP had actually made a direct application, comment or objection, but they could if the RTP had a general but not direct 'material' interest.
- 3.11 The five local authorities who provided comments all fell into the second camp, supporting use of similar wording to that of the Cairngorm Park National Authority (CPNA) which has the extended exclusion but stipulates that councillors declare their interests and absent themselves where the councillor has actually participated in the RTP's decision making or attended any meeting at which the matter has been discussed. This solution was also supported by SWestrans.
- 3.12 South Lanarkshire Council, for example submitted the following suggestion:
- “In relation to (ii), the exclusion applies to (a) Decisions on Planning Applications where the Regional Transport Partnership have submitted comments to the Council as follows:-
- (a) the exclusion applies to any councillor who is also a member of the RTP where the RTP have submitted comments, representations or objections to the Council in relation to a planning application so as to enable the

councillor to take part in the consideration and discussion of, and to vote upon, the determination of the planning application by the Council, subject to the following:-

i. this exclusion applies to meetings of the Council and of any committee or sub-committee of the Council and to other meetings as referred to in paragraph 5.4 of the Code to deal with the planning application."

3.13 One local authority did suggest a slight alternative of allowing a councillor to take part in discussions, thus fulfilling their representative role, but not have any involvement in decision making so ensuring decisions are impartial.

3.14 The RTPs were supportive of an amendment in relation to RTPs. They were also keen to emphasise that relevant conflicts of interest are declared and where they exist, the councillor should not attend meetings or be involved in decision making.

"Where there is a clear potential conflict of interest, the Code should make it explicit that the Councillor Member has a duty to absent themselves from the decision making process."

[SPT]

3.15 The Standards Commission suggested three potential wording options:

1) Granting a specific exclusion in respect of RTPs to apply to all quasi-judicial and regulatory matters but with the same caveats as currently apply to other bodies covered by the specific exclusion at paragraph 5.18(2)(i);

2) Granting a specific exclusion in respect of RTPs to apply to all quasi-judicial and regulatory matters but without the same caveats as currently apply to other bodies covered by the specific exclusion at paragraph 5.18(2)(i); and

3) Granting an exclusion to RTPs that is analogous to the specific exclusion covering Members of the Cairngorms National Park Authority at paragraph 5.18(2)(ii).

3.16 The Commission considers that option 2 would remove the safeguards the Code provides in respect of the conflict between the interests of different organisations and be contrary to the spirit and intent of the Code.

3.17 Option 3, adopting the CPNA approach, would mean that councillors, who were also members of an RTP, could only take part in Council discussions and decision making if they had not been involved in the decision by the RTP to make comment, representations and objections and did not attend the RTP meetings

where this was discussed. The Commission thinks this would be too restrictive on councillors and could lead to:

- Councillors refusing to be on a RTP in order still be able to take part in discussion and voting on major planning applications before their Council.
- RTP quorate issues because of councillor members refraining from attending meetings of the RTPs with only external members of RTPs present.
- Potential impact on the statutory purpose of RTPs.

3.18 The Standards Commission comments that the existing quorum requirements of RTPs would have to be altered if option 3 were adopted or the RTP could delegate the making of comments, representations and objections to officers. However, they consider that:

“the role of RTP members could be diminished by such a separation and, in any event, it is arguable such a separation would be artificial (if officers were effectively only voicing what Members had determined) and would not necessarily solve the issue.”

3.19 The Standards Commission supports option 1 and explains that if it was adopted, it would effectively mean councillor members of RTPs would be in the same position as members of a company established wholly to provide services to the Council (such as a leisure trust ALEO). The councillor member would have to declare his or her interest in the RTP but could still take part in the discussion and decision making at any meeting where matters relating to the RTP were discussed, provided the RTP was not making any application or objecting / making representations on one. Having declared an interest, they could also take part in the discussion and decision making on applications where the RTP has an interest, but not one that was considered to be ‘material’.

3.20 The Commission does note there are still difficulties even with this option. In order to develop transport strategies, RTPs are likely to comment on the transport implications of any proposed major planning applications in the region they cover. As such, a councillor member of a RTP may find it difficult not to be perceived as pre-judging or demonstrating bias in respect of the application when it is considered by the Council. The Standards Commission accepts that this would not necessarily be the case in respect of every strategic transport strategy developed and commented on by a RTP. However, it seemed likely that most major planning proposals would have significant transport implications and it was arguable, therefore, that any comment from the RTP could be perceived as demonstrating a material interest in or being an objection / representation on an application. If so, councillor members would have to withdraw from taking part in the Council’s consideration of the planning application.

Reasons for disagreeing with an amendment to the Code in respect of RTPs

3.21 Opposition to any amendment was voiced by several individuals who raised the following concerns:

- Councillors could be open to being bribed for votes. Councillors should be seen to be taking quasi-judicial or regulatory decisions without any chance of them being influenced by vested interests.
- Trust is already low in elected representatives and this change risks reducing trust further.

“Quasi-judicial and regulatory matters must be transparent and secure the confidence of the public.”

- The issue should be decided case by case at a local level rather than at national level. This was partly because, even if the Code was changed, decisions can still be challenged on the basis of other arguments, eg natural justice.
- Relevant councillors that this would apply to should have their views considered but should not be part of decision making.
- An amendment would confuse the Code and make it more difficult to follow.

3.22 Opposition to the amendment was also raised by three local authorities and the Commissioner for Ethical Standards in Public Life in Scotland. The following points were made:

- The current wording of the Code is sufficient to allow Councils to carry out their regulatory functions as it stands with no problems experienced.
- The Commissioner for Ethical Standards in Public Life in Scotland made the point that councillors are not currently prevented from taking part in the consideration of planning decisions simply because they are a member of an outside body which has made an application. They highlight that Paragraph 7.6 of the Councillors’ Code of Conduct states that the “requirements of this part of the Code should not limit you from discussing or debating matters of policy or strategy, even though these may provide the framework within which individual applications will in due course be decided”. They go on to say that, clearly, if a councillor as a member of the outside body commented on or indicated a pre-judgemental view of an application, they may be affected by paragraph 7.3 of the Code, but membership alone of an outside body is not the issue. The Commissioner recommends that each set of circumstances

needs to be looked at on its own merits to determine if a declaration and withdrawal is required.

- The suggested amendment risks undermining public trust in the impartiality of members involved in decisions of a regulatory or quasi-judicial nature (ie planning and licensing processes). One Council maintained that “Granting a licence or planning permission is quasi-judicial and affected councillors should not take part in that type of decision-making”.

4. Should an amendment apply to all public bodies and not just RTPs?

- 4.1 The consultation document highlighted that, although the issue has been raised specifically in relation to RTPs, it was also perhaps relevant in connection with other public bodies.
- 4.2 Question 4 asked respondents who agreed to an amendment in question one, if that amendment should apply to all public bodies, and not just RTPs. Question 5 then asked for comment, but only from those who had responded no to question 4. Although the questions were intended for those who had only responded in a particular way in a previous question, respondents did take the opportunity to comment elsewhere in the consultation and relevant views are captured in the analysis.

Level of support for whether an amendment should apply to all public bodies, not just RTPs

- 4.3 A total of 24 respondents provided a response to question 4 with 14 non-responses, reflecting the way the question had been worded. Fifteen were in favour of extending the amendment to all public bodies and 9 were against.
- 4.4 All 8 individuals in favour of an amendment in relation to RTPs also favoured this being extended to all public bodies. Patterns for the other respondent types were more mixed, see Table 4.1.

Table 4.1: Responses to question four by respondent type

	Yes	No	Non response
Statutory Regional Transport Partnerships	2	1	3
Local Authorities	4	3	2
Other organisations - Public Bodies (3) and 1 Local Authority licensing board	1	3	0
Individuals	8	2	9
Total	15	9	14

Reasons for disagreeing with an amendment to the Code in respect of all public bodies

- 4.5 The main objection to extending the amendment was on the basis of concern about reducing public trust in Council decision making and making it open to fraud.
- 4.6 Fife Council were concerned that elected members are also members of a wide range of public bodies and extending the amendment could lead to unreasonable perceptions by the public that a councillor's views on any representation or planning application by such bodies they are involved in is already a 'done deal'.
- 4.7 The Standards Commission saw a distinction between RTPs and other external bodies with RTPs being more consultative by comparison and other external bodies may have a more direct interest in quasi-judicial or regulatory matters. Their concern was that, if applied to all public bodies, it could blur the distinct roles of a councillor and member of an external body leading to a lowering in public confidence that decisions in quasi-judicial or regulatory matters are made in accordance with the relevant legislation and policy to further either planning or licensing objectives rather than serving the interests of the body.
- 4.8 It was also suggested that the amendment more generally went beyond the measures necessary to fix the current perceived issue. It was felt to be possible to operate effectively with the Code as currently worded and it was reiterated that such issues should be decided on a case by case basis at a local level rather than a change to the Code.

5. Additional comments or suggestions

- 5.1 Included here are the responses to question six (which invited any other comment about the provisions of the Councillor's Code on declarations of interest as regards councillors who are also members of other bodies) and which were not specific to earlier questions, as well as broader comments made throughout the consultation.
- 5.2 A range of opinions were offered from those who felt there should be some degree of trust in councillors and that the Code and declarations of interest should not of themselves hinder carrying out of Council business and bar membership of other bodies, to those that were very clear that conflicts of interest should prevent involvement in membership and/or decision-making.
- 5.3 One RTP pointed out that councillors who sit on planning committees are fully trained and a decision to declare interests where relevant should be at their discretion. A declaration of membership, where no conflict of interest existed, was felt to be overly bureaucratic. There were calls, however, that a record of declarations of interest should include historical or past interests, continue to be updated and added to and an entry only removed if disassociation has been proven. A further suggestion was that conflicts of interest should be extended to include the interests of family members too. It was also expressed that declaration of interests be extended to all organisations a councillor might be a member of (public and private - including subsidiary companies/bodies where the parent company/body interest is already declared), as well as applying it to Community Councils.
- 5.4 A further suggestion was that specific Codes should apply to public and private bodies.
- 5.5 The opportunity was taken by a number of respondents to suggest the Scottish Government undertake a wider review of the Code with some highlighting a range of issues that it was felt needed to be addressed. This included calls for making the code simpler and more 'user-friendly'. It was also emphasised that any amendments to the Code must be done with the aim of maintaining public confidence in impartial decision making as well as be supportive to councils in conducting their business as efficiently and openly as possible.
- 5.6 It was recommended there should be legislation to ensure that councillors acting as a member of any other body have their position and duties as a councillor protected. Specific reference was made by a couple of the local authorities to circumstances relating to councillor membership of Arms-Length External Organisations (ALEOs) with concern that any amendments that might apply to all public bodies allow for specific exclusion re ALEOs to ensure their duties are not hampered.

- 5.7 A suggestion was made to appoint more non-councillors on to RTPs and a concern expressed that there are too few people sitting on all the decision making committees.
- 5.8 One respondent suggested that councillors should have the authority to demand that the RTP co-operate with all transport providers including roads departments rail bus and aircraft transportation, where appropriate, and that the facilities provided allow for integration as seamlessly as possible of all interested parties with interactive and co-ordinated transport facilities.

Annex 1: Consultation questions

Q1 Do you agree or disagree that the Councillors' Code of Conduct be amended so that councillors who have been nominated or appointed by their councils to membership of a Regional Transport Partnership can take part in discussion or decision taking on matters of a quasi-judicial or regulatory nature in which that body has an interest? [Agree/Disagree]

Q3 If you agree – How should the amendment be worded? [Open comment]

Q4 If you disagree please explain why you do so. [Open comment]

Q4 If you agree - should that amendment apply to all public bodies, not just RTPs? [Yes/No]

Q5 If you have answered no please explain why. [Open comment]

Q6 We would also ask if respondents have any other comments or suggestions about the provisions of the Code on declarations of interest as regards councillors who are also members of other bodies. [Open comment]

Annex 2: List of consultation respondents

Local Authority respondents (9 total)

- West Dunbartonshire Council
- West Lothian Council
- Fife Council
- The City of Edinburgh Council
- Dumfries and Galloway Council
- South Lanarkshire Council
- North Lanarkshire Council
- Shetland Islands Council
- Aberdeen City Council

Regional Transport Partnerships (6 total)

- South West of Scotland Transport Partnership (SWestrans)
- Nestrans
- South East Scotland Transport Partnership (SEStran)
- Zetrans
- Tactran
- Strathclyde Partnership for Transport

Other respondents (23 total)

- The Commissioner for Ethical Standards in Public Life in Scotland
- Standards Commission for Scotland
- Accounts Commission for Scotland
- West Dunbartonshire Licensing Board
- 19 individual respondents



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