Leicester
City Council

MEETING OF THE STANDARDS COMMITTEE

DATE: THURSDAY, 7 NOVEMBER 2013
TIME: 5:30 pm
PLACE: THE FOUNTAIN ROOM - GROUND FLOOR, TOWN HALL, TOWN HALL SQUARE, LEICESTER

Members of the Committee

Councillor Waddington (Chair)
Councillor Shelton (Vice-Chair)
Councillor Senior
Councillor Sood
One Non-Grouped Member Vacancy

Ms Amanda Fitchett (Independent Member)
Mr Desmond Henderson (Independent Member)
Ms Joanne Holland (Independent Member)
Mr Stephen Purser (Independent Member)
Ms Fiona Barber (Independent Member)

Standing Invitees:
Mr David Lindley (Independent Person)
Ms Caroline Roberts (Independent Person)

Members of the Committee are summoned to attend the above meeting to consider the items of business listed overleaf.

G. J. Carey

for the Monitoring Officer

INFORMATION FOR MEMBERS OF THE PUBLIC

ACCESS TO INFORMATION AND MEETINGS

You have the right to attend Cabinet to hear decisions being made. You can also attend Committees, as well as meetings of the full Council. Tweeting in formal Council meetings is fine as long as it does not disrupt the meeting. There are procedures for you to ask questions and make representations to Scrutiny Committees, Community Meetings and Council. Please contact Democratic Support, as detailed below for further guidance on this.

You also have the right to see copies of agendas and minutes. Agendas and minutes are available on the Council's website at www.cabinet.leicester.gov.uk or by contacting us as detailed below.

Dates of meetings are available at the Customer Service Centre, King Street, Town Hall Reception and on the Website.

There are certain occasions when the Council's meetings may need to discuss issues in private session. The reasons for dealing with matters in private session are set down in law.

WHEELCHAIR ACCESS

Meetings are held at the Town Hall. The Meeting rooms are all accessible to wheelchair users. Wheelchair access to the Town Hall is from Horsefair Street (Take the lift to the ground floor and go straight ahead to main reception).

BRAILLE/AUDIO TAPE/TRANSLATION

If there are any particular reports that you would like translating or providing on audio tape, the Democratic Services Officer can organise this for you (production times will depend upon equipment/facility availability).

INDUCTION LOOPS

There are induction loop facilities in meeting rooms. Please speak to the Democratic Services Officer at the meeting if you wish to use this facility or contact them as detailed below.

General Enquiries - if you have any queries about any of the above or the business to be discussed, please contact Graham Carey, Democratic Support on 0116 229 8813 or email Graham.Carey@leicester.gov.uk or call in at the Town Hall.

Press Enquiries - please phone the Communications Unit on 0116 252 6081

PUBLIC SESSION

AGENDA

1. **APOLOGIES FOR ABSENCE**

2. **DECLARATIONS OF INTEREST**

    Members are asked to declare any interests they may have in the business on the agenda, and/or indicate that Section 106 of the Local Government Finance Act 1992 applies to them.

3. **MINUTES OF PREVIOUS MEETING**   **Appendix A**

    The minutes of the meeting of the Standards Committee, held on 5 September 2103, have been previously circulated and Members are asked to confirm them as a correct record.

4. **ANNUAL REPORT OF STANDARDS COMMITTEE**   **Appendix B**
    2012/13

    The Monitoring Officer submits the first Annual Report of the Standards Committee 2012/13, following the change of legislation which took effect on 1 July 2012. The Committee is asked to note the report and make any recommendations to the Standards Committee regarding the Standards regime.

5. **A COUNCILLOR'S GUIDE TO USING SOCIAL MEDIA**   **Appendix C**

    The Committee is asked to note and comment on the Councillor's guide to using Social Media.

6. **REGISTER OF INTERESTS**

    The Monitoring Officer will lead a discussion in relation to the requirement for an annual updating of the Register of Interests by Elected Members and Co-opted Members.

7. **WORK PROGRAMME**

    The Committee are asked to discuss it's forthcoming programme of work.

8. **COMPLAINT AGAINST COUNCILLORS - UPDATE**   **Appendix D**

    The Monitoring Officer submits a report giving feedback on complaints against Councillors reviewed and/or determined since the last meeting and updating the Committee on progress with outstanding complaints against Councillors. The Committee is recommended to receive and note the report.

9.   ANY OTHER URGENT BUSINESS
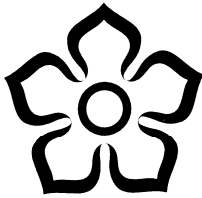
Leicester
City Council

<u>Minutes of the Meeting of the</u>
<u>STANDARDS COMMITTEE</u>

Held: THURSDAY, 5 SEPTEMBER 2013 at 5.30pm

P R E S E N T :

<u>Councillor Waddington</u> (Chair)
<u>Councillor Shelton (Vice-Chair)</u>
Councillor Sood

<u>Also present:</u>

Ms Amanda Fitchett	Independent Member
Mr Desmond Henderson	Independent Member
Mr David Lindley	Independent Person
Ms Caroline Roberts	Independent Person

* * * * * * * * * *

1.   APOLOGIES FOR ABSENCE

Apologies for absence were received from Ms J Holland, Independent Member.

2.   DECLARATIONS OF INTEREST

Members were asked to declare any interests they might have in the business to be discussed. No such declarations were made.

3.   MEMBERSHIP OF THE COMMITTEE

The Monitoring Officer reported that the Annual Council Meeting on 23 May 2103 had appointed the following members of the Committee for the municipal year 2013 /14.

<u>Councillors:</u>

Chair: Councillor Waddington
Vice Chair: Councillor Shelton
Councillor Sood
1 Non-Grouped Member*

*Note – The Non-Grouped Member place would remain vacant until further notice. The place had been offered to the Non-Grouped Members but no one wished to take the place.

Independent Members:

Amanda Fitchett
Desmond Henderson
Joanne Holland

The Chair reported that the City Mayor had agreed to increase the membership of the Committee by 1 Councillor at the next Council meeting.

The Monitoring Officer reported that he had advertised for applicants to fill the two Independent Member vacancies on the Committee.

RESOLVED:
> that the current membership of the Committee and the proposals to increase the membership and fill the vacancies for Independent Members be noted.

4. **DATES OF COMMITTEE MEETINGS**

The Monitoring Officer reported that future meetings of the Committee would take place on the following dates:

Thursday 7 November 2013
Thursday 30 January 2014
Thursday 10 April 2014
Wednesday 21 May 2014

All meetings were scheduled to take place at 5.30 pm in the Fountain Room, Ground Floor, Town Hall, Leicester.

The Chair stated that whilst Members of the Committee should be reserve the dates for meetings above, a meeting may not take place if there was insufficient business to be conducted.

It was also reported that there was a need to arrange a meeting of the Standards Advisory Board to consider an Independent Investigator's report into a complaint against a Councillor. Members were advised of a number of dates when the Independent Investigator could attend a meeting to present the report and Members were requested to indicate their availability for one of these dates.

RESOLVED:
> 1) that the dates of future meetings be noted; and
>
> 2) that a meeting of the Standards Advisory Board be arranged for Monday 14 October 2013 at 5.30pm in the Town Hall to

consider the Independent Investigator's report.

5. MINUTES OF PREVIOUS MEETING

RESOLVED:

> that the minutes of the meeting of the Standards Committee held on 14 November 2012 be confirmed as a correct record, subject to Ms Caroline Roberts being deleted from the list of those present as she had submitted her apologies which were recorded.

6. REVISION TO STANDARDS CODE AND ARRANGEMENTS

The Monitoring Officer submitted a report on the revised 'Code' and 'Arrangements' for dealing with complaints against Members and co-opted Members under the Localism Act 2011.

Members were asked to comment on the revised version of the 'Code' and 'Arrangements', prior to them being submitted for approval to the Council Meeting on 19 September 2013.

The Monitoring Officer outlined the changes to the Leicester City Council's Code of Conduct for Members. The Committee supported the proposed amendments and, following questions from Members of the Committee, the Monitoring Officer stated that:-

- The Code would apply to members whenever they were acting in official capacity and this could include when they were outside of Leicester.
- It might be inferred that the misuse of the Authority's equipment was not covered under the Code of Conduct when a member was not acting on Council business (i.e. downloading inappropriate images onto a Council laptop in their private life). However, there was law that the misuse of Council equipment brought the Member within the general jurisdiction of the Code.

The Monitoring Officer outlined the proposed changes to the Arrangements for dealing with complaints against Members and co-opted Members under the Localism Act 2011. In doing so, the Monitoring Officer referred to the recommendation stated in Minute No. 23 of the previous meeting and confirmed that it was not possible to implement the proposal to delegate the function of removing an ungrouped member to the Standards Committee to ensure parity of treatment between grouped and non-grouped members. The Council could not delegate that particular function to the Standards Committee. In practice this would mean that in instances where the Committee agreed that the sanction should be the removal of a member from a Council Committee; the Committee would need to contact the Group Whips in instances where appointments were the Whips had made the made the appointments of Grouped Members to a Committee. Where the sanction involved a non-grouped member, then a report would have to be submitted to the Council recommending that the non-grouped member be removed from a Committee.

Members also noted that the Political Conventions had now been revised and would be submitted to the Council meeting in September for approval.

RESOLVED:-

1) that the Code of Conduct for Members be approved subject to the following amendments:-

a) Add 'inside and outside the City Boundary' to the note under paragraph 1 of the Code; and
b) Delete 'for political purposes' at the end of paragraph 3 (h).

2) that the 'Arrangements for dealing with complaints against Members and co-opted Members under the Localism Act 2011- be approved subject to the following amendments:-

a) Add at the end of the paragraph under D(1) 'Where the Monitoring Officer lodges a complaint, it shall be made to the Standards Committee via the Deputy Monitoring Officer.';
b) Add 'Standards Committee c/o the' after 'Complaints must be made to the' in the first line under D(2);
c) Add 'on behalf of the Standards Committee' at the end of the first paragraph under D(2);
d) Add a new paragraph at the end of D(2) – 'Complaints should be lodged promptly, and normally within 3 months of the alleged breach occurring, unless there are good reasons for the Monitoring Officer or Independent Person to accept a complaint lodged outside this period.';
e) Amend the second paragraph under D(4) to indicate the complaint will be sent to the subject Member within 5 days of the complaint being acknowledged, and add 'or legal' after 'exceptional' and before 'reasons' later in the paragraph; and
f) Amend '15 working days' to '5 working days' in the second sentence the paragraph headed 'Review of a Complaint' under D(4).

7. ANY OTHER URGENT BUSINESS

The Chair reported that she had agreed to take an item of Any Other Urgent Business to discuss the 'Annual Report of the Standards Committee 2012/13' as this should be reported to the Council in September

RESOLVED:

that the 'Annual Report of the Standards Committee 2012/13' be accepted as an item of any other urgent business as the next

scheduled meeting of the Committee was not until 7 November 2013.

8.   **ANNUAL REPORT OF STANDARDS COMMITTEE 2012/13**

The Monitoring Officer circulated a report which was the first annual report of the Committee since the change in legislation which took effect on 1 July 2012. The report focused on the range and nature of the work that had come to the attention of the Committee under the Localism Act 2011. The Monitoring Officer sought the views of the Committee on the content and style of the report.

Members discussed the report and made the following comments and observations:-

- The introduction should remind Members of what the new arrangements had hoped to achieve and whether these achievements had been met;
- An indication of the performance in dealing with the complaints within the agreed timescales;
- An indication of the costs of operating the new system compared to the previous one and what the annual cost to the Council had been;
- If possible, feedback from the public and councillors on their confidence in the operation of the new regime should be included in the report;
- The date the complaint was submitted should be included in the report;
- The appendix to the report giving details of individual complaints should take account of the following comments:-
    - The description of 'Dismissed -No Breach' did not fully reflect the significant actions that were taken and the discussions that were held with the Member;
    - The use of Cllr 'X' and Cllr 'Y' in all the complaints could give the impression that only 2 Councillors were involved in all the complaints;
    - More details could be included in the report if it was considered at a meeting where the public and press were excluded for the item, as this would enable members to have a more meaningful discussion; and
    - Some complaints were described as 'Behaviour' and others as 'Inappropriate Behaviour' when there was no real difference between the two in relation to complaints being submitted under the Code of Conduct.

RESOLVED:
      that the Monitoring Officer submit a revised Annual Report to a future meeting for consideration taking into account the comments made by the Committee above.

9.   CLOSE OF MEETING

The Chair declared the meeting closed at 6.47pm.
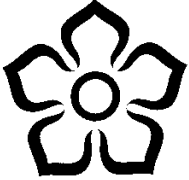
![Leicester City Council logo]

WARDS AFFECTED

All

Leicester City Council

FORWARD TIMETABLE OF CONSULTATION AND MEETINGS:

STANDARDS COMMITTEE	**7th November 2013**
COUNCIL	**21st November 2013**

_____

ANNUAL REPORT OF STANDARDS COMMITTEE 2012/2013

_____

Report of the Monitoring Officer

1. PURPOSE OF REPORT

1.1. This is the first report of the Standards Committee following the change of legislation which took effect on 1st July 2012. Council have separately:

- Endorsed constitutional provisions which deal with the structure of the new regime for dealing with member misconduct complaints (i.e. creation, size and term of reference of the Standards Committee and Standards Advisory Board)

- Approved two key documents (the "Code" and the "Arrangements") which, respectively, set out the expected standards of behaviour of elected members and the procedural framework under which misconduct allegations are processed.

1.2. This report focuses specifically upon the range of work that has come to the attention of the Standards Committee during the first full year of operation of the new provisions under the Localism Act 2011. Its purpose is to, therefore, review the nature of the cases and complaints that have been made, review the effectiveness of the arrangements for dealing with those complaints to invite commentary upon any further work needed, either to ensure a minimisation for the potential for members to engage in conduct which could form the likely substance of a complaint, or to review the effectiveness of the regime itself, or both.

2. RECOMMENDATIONS

2.1. To note the report and make any recommendations to the Standards Committee regarding the Standards regime.

3.   REPORT

Principles

3.1.1. The new regime was established on 1st July 2012 with the following principles:

a. **There should be simplicity to the scheme so that it is easily understood and transparent**

b. **There should be flexibility at every stage of the process for informal resolution and / or robust decisions to be taken about "no further action"**

c. **There should be Member involvement at key stages in the process**

d. **There should be the involvement of Independent Members (IM) and the Independent Person (IP) at key stages of the process**

e. **The Monitoring Officer should have greater powers to deal with complaints relating to the Code of Conduct**

f. **Rights for complainants to seek a "review" of a decisions at various stages should be limited, consistent with the reduced scope and severity of allowable outcomes that can be imposed under the new regime**

g. **At any stage in the process where it is clear that a matter should be referred to the police this should be done and the local investigation should be suspended**

3.2.   Volume

No. of cases lodged 1st July 2012 to 30th June 2013	**12**
Total No. of cases processed 1st July 2012 to 30th June 2013	**16**

3.3. During the relevant period 1st July 2012 to 30th June 2013 there were 16 complaints dealt with. The first four of these were complaints that were initially lodged under the previous standards regime (pre-July 2012) but were not fully concluded by July 30th 2012 and were, therefore, finalised under the new regime. It follows that 12 of the 16 complaints were made after July 1st 2012, giving an average of one complaint per calendar month referred to the Monitoring Officer

3.4. Source

Complaints from members of the public	**11**
Complaints from other Councillors	**3**
Complaints from staff	**1**
Other	**1**

3.5. 11 of the 16 complaints came from a member of the public. Three of the remaining five complaints were Councillor-on-Councillor complaints. One complaint was by a member of staff and one complaint was by a senior professional who works closely with the Council but is not an employee (or, strictly, a member of the public).

3.6. Nature

Behaviour	**7**
Unhelpfulness	**5**
Declarations	**1**
Planning Bias	**1**
Unavailability	**1**
Abuse of position	**1**

3.7. The single most common theme for complaints was alleged Councillor 'behaviour'. It must be noted that four of the seven complaints related to this theme sprang from the same Ward, and involved the same two Councillors.

3.8. The theme of 'unhelpfulness' predominantly involved allegations form constituents that their issues were not being pursued by the elected member from whom they had requested action/support

3.9. <u>**Route**</u>

Dealt with by M.O. and I.P	**8**
Dealt with after 'Review' by M.O. and second I.P	**4**
Proceeded to Independent Investigation	**4**
Proceeded to Standards Hearing	**0**

3.10. Twelve of the sixteen complaints (75%) were dealt with by the Monitoring Officer in conjunction with one of the two Independent Persons appointed shortly after 1st July 2012. These complaints do not come to the attention of the Standards Committee or the Standards Advisory Board (a sub-committee of the Standards Committee which looks at specific complaints) save by way of anonomysed and very brief update at each Standards Committee meeting which is convened throughout the year. The vast bulk of the complaint work is therefore now dealt with by the Monitoring Officer with the Independent Person and only in the minority of cases where an independent investigation is commissioned, and subsequently reports, does the Standards Advisory Board sit to consider that report.

3.11. Of these twelve cases, four involved the complainant seeking a "review" of the first-stage decision. The Council's "Arrangements" allow for this right to be exercised in respect of all outcomes short of referral for independent investigation. A review is achieved by the Monitoring Officer sending the complaint to the second Independent person, essentially for a second opinion as to outcome. In each of the four cases taken to review level over the past year, whilst in some of them an additional angle has been considered / explored / explained, the ultimate conclusion in each of those four cases was not different to that reached by the first Independent Person in conjunction with the Monitoring Officer. The view of the Monitoring Officer on this is that this demonstrates positives both with regard to a broad level of consistency between the Monitoring Officer and the two Independent Persons as to the appropriate threshold and proper use of the Standards regime in individual cases, but also acts as a useful mechanism to test out initial decisions and indeed to explore other avenues which may not have received particular attention when the complaint was first looked at.

3.12. Four of the sixteen complaints proceeded to independent investigation meaning that the Monitoring Officer has, on behalf of the Standards Committee, commissioned from an external source a fully independent investigation into the alleged misconduct. This is reserved for more serious complaints, though that is not to say that the independent investigations conclude that misconduct has occurred

3.13. The independent investigator's conclusions are not binding upon the Standards Advisory Board and they must assess whether they agree with the findings of the investigator, or wish to proceed to convene a hearing at which further evidence is given and they hear directly from the complaint, the subject member and any witnesses. In all of the cases considered by the Standards Advisory Board during the relevant period of this report (three of the four cases – one is due for consideration later in the year), the Board have, after

detailed scrutiny of the report and on some occasions with the benefit of the report writer being there at the Board meeting, concurred with the independent investigator's findings of no breach. Even in these cases the Board has taken a broad view of its function and, wherever possible, have recommended practice changes or other feedback to be given either to elected members, officers or any other relevant persons such as to reflect any useful learning from those investigations, or indeed to comment upon the alleged misconduct where it is clear that standards of behaviour which may not have met the threshold for formal findings were still worthy of comment / critique

3.14. <u>Outcome</u>

Dismissed (trivial, or not covered by Code)	3
Dismissed (considered and no "breach" identified)	6
Dismissed after Independent Investigation	3
Informal resolution (potential breach, remedied informally)	4

3.15. Three complaints were dismissed as either being trivial (complaints lodged alleging the Councillor had failed to act, but lodged within just a few short days of seeking help) or as alleging misconduct when the Councillor was not in fact acting as a Councillor.

3.16. The outcome of informal resolution was applied in four of the sixteen cases. Informal resolution always involves the Monitoring Officer making direct contact with the elected member and meeting with them in order, not necessarily to take their version of the events of the complaint (where it is necessary the Arrangements allow for this to be done under the earlier fact finding phase of an investigation), but rather to ask the elected member to reflect upon the alleged behaviour (without necessarily admitting it) and trying to get the elected member to see the complaint from the complainant's perspective. The application of this outcome has, in the majority of those cases, resulted in the elected member offering an apology to the complainant for any perceived injustice or frustration felt, and taking away some advice by the Monitoring Officer to avoid repetition of such types of complaints in the future. In some cases that advice has been behavioural (such as asking the elected member to stand in the shoes of the complainant and viewing the alleged conduct from that angle, to whether they might have acted differently as a result) and in other cases it has been procedural (pragmatic advice about a step which a councillor should have taken but failed to do so such as declaring a gift)

3.17. It is notable that the majority of the complaints which came from members of the public related in one way or another to the constituent's frustration at not being given adequate information by the elected member. These were cases where a member of the public had made contact with an elected member with a view to seeking the elected member's assistance in resolving a matter over which the Council had some operational responsibility. None of these cases resulted in a finding of misconduct of the elected member. However, in some of the other nine cases the Monitoring Officer and Independent Person (and indeed independent investigator through reports) have remarked that simple acts of "customer

care" such as acknowledging with the constituent /member of the public what action the Councillor has taken, when they expect to receive a reply/response from officers, and when they hope to get back to the member of public would have gone a long way to avoiding the need for that complaint to be lodged in the first place

Other learning:

3.18. Other examples of learning from complaints that has extended beyond the immediate complaint:

- One case revealed the need for Leicester City Council to devise some guidance about the use of social media for councillors specifically. This is on the work programme for the Standards Committee and a draft has been prepared..

- One case resulted in practical changes to the way in which the Council allows elected members to include links to additional websites through their Council profile. It became clear during that investigation that where a member of the public accesses views and opinions of a Councillor, not through their City Council home page, but through a link that appears on the City Council's home page then they may attribute those views and opinions as being those shared but the local authority. This is, of course, not the case and therefore the change of practice following that investigation was for there to be a disclaimer on the Council's pages when a hyperlink to councillor's own website/link is accessed therefrom.

- One case involved a significant set of rewrites to the previous Planning Code of Practice. Again, whilst no findings of misconduct were supported during that investigation, there were sufficient lessons to be learned about the phraseology of the previous Planning Code and the specificity of some of the procedural guidance given to councillors who sit on Planning Committee, which have since been revised, refreshed and now leave no room for doubt on those areas

Other issues:

Cost

3.19. The previous regime for dealing with Member misconduct complaints required each complaint to be assessed by an Assessment subcommittee made up of Elected Members and chaired by an Independent lay member. Reviews were also determined through a Review subcommittee. The new system sees all complaints and reviews filtered through the Monitoring Officer and the Independent Person(s), and only a minority of complaints having active Committee input (25% on current figures). There is therefore a saving of costs in respect of equivalent officer-support time for these Assessment and Review subcommittees, as well as the saving of time of the elected members themselves. Neither is there any cost associated with room bookings, printing etc.

Speed

3.20. The previous regime set the following timeframes:

Complaint received ► Assessment subcommittee (within 4 weeks) ► Review subcommittee (within 6 weeks) ► Investigation (within 3 months) ► Hearing (within 3 months)

3.21. The new process sets the following timeframes:

Complaint received ► Decision by M.O. and I.P (within 4 weeks) ► Review (within 3 weeks) ► Investigation (within 3 months) ► Hearing (within 3 months)

3.22. Not only do the timescales allow for speedier resolution of complaints, but the substantive process itself confers more power upon the Monitoring Officer and Independent Person to undertake basic enquiries, and to seek informal resolution in low-level cases of breach. The figures for 2012/13 (see 3.10) reveal that 75% of cases are dealt with within the four week or seven week windows.

4. FINANCIAL, LEGAL AND OTHER IMPLICATIONS

4.1. Financial Implications

4.2. Legal Implications

None

4.3. Climate Change Implications

5. OTHER IMPLICATIONS

OTHER IMPLICATIONS	YES/ NO	Paragraph/References Within the Report
Equal Opportunities		
Policy		
Sustainable and Environmental		

Crime and Disorder		
Human Rights Act		
Elderly/People on Low Income		
Corporate Parenting		
Health Inequalities Impact		

6.   BACKGROUND PAPERS – LOCAL GOVERNMENT ACT 1972

7.   REPORT AUTHOR

7.1.   Kamal Adatia, City Barrister and Head of Standards.

A Councillors' guide to using social media

What is social media?

Social media is a collective term used to describe easy ways to create and publish on the internet. People generally use the term to describe how organisations and individuals share content – text, video and pictures – and create conversations on the web. It is transforming the way that companies do business and individuals interact with each other. It is providing a voice for those who weren't well heard before. Social media will change the way that councillors and councils interact with local people. Councillors, councils and their partners are using social media for a wide range of purposes. It is being used as a way to spark innovation, drive efficiency and engage in conversations with local people. As well as using social media themselves, members should ensure that their local authority as an organisation is using it well.

Unhelpfully, when many people talk about social media, they talk about the tools. Twitter. YouTube. Blogging. This can seem like impenetrable jargon. The important thing to remember about social media is that it's social. It's about communication. See Appendix 1 for a guide to the tools

Social media is usually fairly open, meaning a wide variety of people can see, comment on or collaborate on materials. The tools are usually free or low-cost and very often easy-to use, requiring no more skill than adding an attachment to an email or creating a Word document. And most importantly, social media is designed to be shareable, meaning that it's very easy for people to forward, link to or even re-publish content. This means there are very low barriers to entry for sharing opinions with a potentially very wide audience.

You may also see the term 'web 2.0'. This is used as shorthand to describe how social media has changed the content of the internet from being dominated by one-way publishing or e-commerce, to a greater emphasis on words, pictures, music and videos being published, shared and commented on by ordinary people

Attached at Appendix 2 are examples of how some councils are using social media.

Opportunities not taken

Although social media can be used to effectively and efficiently support council priorities, in most councils these opportunities have not yet been fully exploited. There are significant barriers to using social media within councils for both councillors and officers who wish to engage with citizens to improve local services. Some are technical, but most are cultural.

For example:

• Access to social media sites like Facebook, blogs, Twitter and YouTube is routinely blocked from council computers.

• There may be no clear policy on using social media for councillors or officers either in a personal capacity or in an official capacity.

• There may be a lack of clarity about whether a councillor's blog or social media profile can be linked from council corporate sites and whether this counts as political or council business.

• Communications strategies rarely incorporate social approaches.

• There often isn't a clear policy for responding to comments from citizens on social networks, whether these be compliments, complaints or service requests.

• Computers can be out-of-date or ill-equipped to use social media. For example, older versions of web browsers or computers with no sound makes viewing residents' YouTube videos impossible.

A word of warning… staying out of trouble online

Any form of communication is rife with the possibility of misunderstandings. Social media is perhaps no more or no less vulnerable to this, but there are some new ways to misfire with your message. Although the best use of social media is conversational in tone, publishing to the web is still publishing. What you've 'said' on the web is written down and it's permanent.

In the main, councillors have the same legal duties online as anyone else, but failures to comply with the law may have more serious consequences. There are some additional duties around using their websites for electoral campaigning and extra care needs to be taken when writing on planning matters.

Libel

If you publish an untrue statement about a person which is damaging to their reputation they may take a libel action against you. This will also apply if you allow someone else to publish something libellous on your website if you know about it and don't take prompt action to remove it. A successful libel claim against you will result in an award of damages against you.

Copyright

Placing images or text on your site from a copyrighted source (for example extracts from publications or photos) without permission is likely to breach copyright. Avoid publishing anything you are unsure about, or seek permission in advance. Breach of copyright may result in an award of damages against you.

Data Protection

Avoid publishing the personal data of individuals unless you have their express written permission.

Bias and pre-determination

If you are involved in determining planning or licensing applications or other quasi-judicial decisions, avoid publishing anything on your blog that might suggest you don't have an open mind about a matter you may be involved in determining. If not, the decision runs the risk of being invalidated.

Obscene material

It goes without saying that you should avoid publishing anything in your blog that people would consider obscene. Publication of obscene material is a criminal offence.

Electoral periods

The Electoral Commission requires that candidates provide a return of expenditure on any form of advertising or campaign literature and that includes web advertising. And there are additional requirements, such as imprint standards for materials which can be downloaded from their website.

The council's legal position

Material published by a local authority as an organisation is, for obvious reasons, restricted in terms of content. It must not contain party political material and, in relation to other material, should not persuade the public to a particular view, promote the personal image of a particular councillor, promote an individual councillor's proposals, decisions or recommendations, or personalise issues. Nor should the council assist in the publication of any material that does any of the above.

Some councils take a strict line on this and do not provide links to councillor blogs or social media accounts from councillor profile pages. But many people (especially young people) prefer to communicate via social networks and so this is as valid a method of communication as an email address. This can have significant advantages in terms of transparency and the ability to answer frequently asked questions more efficiently through an open format. Bearing in mind, of course, the data protection requirements.

The Members' Code of Conduct

It's worth pointing out that councillors can have 'blurred identities'. This means you have a social media account where you comment both as a councillor and as an individual. For example a Facebook account where you've posted about a great night out (personal) and another time explained the council position on pothole repair (councillor). It may be clear in your mind when you are posting in a private capacity or as a councillor, but it could be less clear to others. Such blurred identities might for example have implications where your views are taken as those of your organisation or political party, rather than your personal opinion. So it's worth mentioning the need to get your on social media accounts/ profiles clear, then you can be confident as to what you can and can't say while you are representing your organisation or party.

How you use your online identity will also determine how online content will be treated in respect of the Members' Code of Conduct. Councillors are expected to communicate politically. There is a difference between communicating on behalf of the council, for example blogging as an un-elected Mayor, or as a councillor or as a private citizen, and the former will be held to a higher standard than the latter. The key to whether your online activity is subject to the Code of Conduct is whether you are giving the impression that you are acting as a councillor. And that stands whether you are in fact acting in an official capacity or simply giving the impression that you are doing so.

This may be less than clear if you have a private blog or a Facebook profile. There are a number of factors which will come into play which are more a question of judgement than a hard and fast line. For example, a Standards Committee may take into account how well known or high profile you are as a councillor, the privacy settings on your blog or social networking site, the content of the site itself and what you say on it. Most councillors are using their online profile to communicate with citizens about representing their local area so engaging the code, if necessary, should be a relatively straightforward decision. Since the judgement of whether you are perceived to be acting as a

councillor will be taken by someone else, it's safest to assume that any online activity can be linked to your official role.

Unless you've gone to significant effort to keep an online persona completely separate from your councillor identity, you are unlikely to be able to claim that you were acting in a completely private capacity.

Aspects of the Members' Code of Conduct will apply to your online activity in the same way it does to other written or verbal communication you undertake. Members should comply with the general principles of the Code in what they publish and what they allow others to publish.

You will need to be particularly aware of the following sections of the Code:

• **Treat others with respect**. Avoid personal attacks and disrespectful, rude or offensive comments.

• **Comply with equality laws**. Take care in publishing anything that might be considered sexist, racist, ageist, homophobic or anti-faith.

• **Refrain from publishing anything you have received in confidence**.

• **Ensure you don't bring the council, or your councillor role, into disrepute.**

Members of the public (or other members or officers) may make a complaint about you if you contravene the Code of Conduct. That complaint, and the sanctions that may be imposed, will be considered by the Standards Committee.

Just using good sense

There are few additional things to be aware to ensure you are well-respected online. For those new to the online world it can take a short time to get used to the culture of the web.

Avoiding gaffes and maintaining good 'netiquette'

• Make your commenting policy clear

You will need to take note of the comments that other people make on your site. It may be a fine line to tread, but if you allow offensive or disrespectful comments to stand on your site then it can put off other members of your community and you may even be called to account under the Code of Conduct. For blogs, the easiest way to handle this is to moderate comments and to state clearly on your site that you're doing so and reasons why comments may be rejected. For Facebook or other social networks, including multi-media sites like YouTube and Flickr where people can post public or semi-public messages to your profile, you will need to regularly check on messages (you can be notified by email) or, far less preferably, disable message posting.

• Allow disagreement

Some comments may be out of line, but on the other hand deleting the comments of people who disagree with you will backfire. You can't stop them from posting the same comment elsewhere, then linking back to your site and saying you are gagging those who disagree with you.

• Think before you publish

Words can't be unspoken and even if you delete a hastily fired off blog post or tweet it will probably have already been read and will be indexed or duplicated in places on the web beyond your reach.

• Beware the irony

Few writers are able to communicate sarcasm or irony through short online messages. It's probably best to assume that you're one of those that can't.

• Don't be creepy

Some of the terminology in social media, like 'following' or 'friending' can imply an intimacy that's not really there. Both terms just mean you have linked your account to someone else so you can share information. Savvy internet users are used to this, but some people can feel a frisson of unease when their council, local police service or councillor begins following them on Twitter before establishing some sort of online relationship. Some councillors wait to be followed themselves first. Do make use of other communication functions that social media allows you. Twitter's 'list' function, for example, can help you to follow local people in a less direct way. And bloggers are almost invariably happy for you to link to them, so you don't need to ask first in this instance.

• Own up: Social media is transparent

The best bloggers admit mistakes rather than try to cover them up (which isn't possible online). Amending your text and acknowledging your mistake – perhaps by putting a line through the offending words and inserting a correction or providing an update section at the bottom of a blog post

– shows you are not pretending it never happened, and is much better than just deleting it when dealing with online misfires.

• Avoid the trolls

You know that person who always shows up to area forums and asks the tricky but entirely irrelevant questions? That person has an equally difficult cousin who likes to go online. As you begin to use social media, you'll find some argumentative characters out there. Don't get bogged down. You don't have to respond to everything. Ignore if necessary.

Building engagement

More and more local politicians will start embracing social media as part of their political profile. During elections, they will use it to campaign, to organise their supporters, to solicit donations and to explain their positions. While in office, they will use social media to listen and engage with local people, to provide information to local residents and perhaps to campaign on local issues.

Search engines like Google love blogs because they are usually frequently updated and their structure makes it easy to point directly to relevant content. But you can do a few things to make

your online presence easier to find. As you begin to use social networks such as Facebook, Twitter and especially blogging, you'll want to build up their readership to extend their impact.

These tips are based on the advice of Mary Reid, Kingston-upon-Thames councillor and long-time blogger.

1.Choose your name well

Your name is your political brand, so make sure that your blog name and usernames for networks like Twitter clearly identify you as you. This is particularly important if your real name has already been taken by someone else. Although you will certainly want to identify yourself as a councillor, you may or may not want to use the councillor identity as part of your website address or ID (www.cllrsmith.com for example). Keep in mind that you may not win the next election or may not stay with your current party, but still want to remain in local politics and use your online presence. It's much easier to change a few headers on your blog than to change a URL address such as www. democratpat.com. It's slightly easier to change your Twitter ID.

2.Make your blog search engine-friendly

Most people will be interested in you because of the place you represent. Make sure that your ward, your council and commonly used neighbourhood names are included in any 'about' sections and are frequently mentioned in individual blog posts where relevant. Location, location, location.

3.Content is king

If you're covering local issues well, you may be the only online source of information that's important to local people but not listed in the local newspaper. Local peoplesearching for information about schools, libraries or parking will come to your blog.

4. Get linking

If there are other political bloggers, particularly in your area, start linking to them. Ask members of your own party to link to you. The more linked you are by websites with lots of sites linking to them, the more you'll be found in internet searches.

5.Cross-link

Make sure that all your relevant social media accounts link up. Does your Twitter address link to your blog and vice versa? If you have a Facebook political page, you can set it up to be automatically updated from your blog. Is your website address in your email signature? Make sure your councillor profile on the council's website links to your blog. Some councils don't allow this, so this may be something you want to take up at an organisational level.

6. Be reciprocal

The blogosphere (a term to describe the online culture of bloggers) is built as much on reading and commenting as it is on writing and publishing. Good bloggers will leave comments on others' posts and most blogs will allow you to leave a link to your website in the comments section. Some local discussion forums have this functionality, too. But be careful. You can link to your blog in all kinds of

online spaces, but make sure that it's relevant to the discussion at hand. If you've written about a specific issue being discussed, link directly to that post. If you just randomly drop links, it looks desperate.

7. Leave a paper trail

Make sure your political leaflets, cards and so on have your web address or social network details.

8. Be a champion for your local area

Nobody is ever too busy to read good things about themselves or their projects. When you post a good news story, email the people involved to let them know. They will likely pass it on to other people too.

9. Be a good host

A good blog can provide a platform for further discussion. A good host will encourage comments, and these are a key driver for repeat visits. That usually means culling comments which are offensive (the racist, sexist, and homophobic ones or those that attack private individuals, for example) but allowing a healthy and vigorous debate, including disagreement with you.

10. Be realistic

If your blog concentrates on local issues, it is going to be of interest only to a relatively small group of people. But those are often precisely the individuals who are likely to make a difference in your area. Quite 'low' numbers can actually mean a huge reach in a small area.

A few social media tools

When people talk about social media, they often make reference to some well-known tools or products. Although there are many more than we can list here, we'll highlight a few of the general approaches and the most widely used products which are characterised by their ease of use and are free or low cost.

We've attempted to categorise these tools, but their features often mean they can cross-over into different categories and their flexibility means they can be used in many different ways. There are even tools that improve your other tools, such as Friendfeed (which pulls together content from a variety of social media tools and brings them to one place) and Ping.fm (which posts content to a variety of social media tools in one go).

A. Written communication

Blogs

Blogs are easily updated web journals, usually published by an individual or a small group. They are almost always commentable, meaning readers can share their opinions about what the author has written. Blogs have been used by councillors to share their views on public policy, share information about council services or issues of local interest, and canvas opinion. Even very 'business-oriented' local government blogs have a personal feel with bloggers sharing some detail of their daily lives, for example sharing how changes in local services have affected them, how much they enjoyed taking their kids to the village fete, or sharing pictures of tasty local produce.

There are many free blogging tools such as Blogger.com or Wordpress.com which make it easy to set up a blog in a few minutes. However, gaining readership can take longer.

Blogging has been around longer than most of the tools described here, but it is still one of the most powerful. Many councillors use a blog as the bedrock of their social media strategy.

Twitter

Twitter was the social media phenomenon of 2009 and is still growing. It's a way of sharing short snippets of information, links to interesting resources, telling people what you are doing or asking for help. Users are limited to 140 characters (letters, numbers, spaces and punctuation), so it's ideal for sending and receiving text information on the go. It can be used as a one-way publishing tool, pushing out short bursts of information, and many councils use it this way through corporate accounts. However, it's more powerful as a conversational tool, with councillors and local people sharing information and getting feedback.

Many councillors are already using Twitter. You can see a growing list at www.tweetyhall.com, a website that features councillors' use of social media to support local engagement.

On Twitter, people are all identified in the same way, by an @ sign and their username. For example, someone could be registered as @jonsmith, or @governmentmike. You can find their Twitter address by using their full user name without the @ sign

B.Social networking

All of the tools we describe in this guide have an element of social networking, but there are a number of very popular sites dedicated to building social networks. Social networking means using online tools to build communities of individuals who are interested in sharing information and support. Networks like Facebook, Bebo and MySpace can be used to facilitate connections between people who already know each other, usually in a social context. But it can also be used by organisations and businesses to share information about products, services or events with a range of interested individuals. Other social networking tools like LinkedIn are built around professional identities, where the focus is specifically on an individual's career, and often their job search or developing business leads.

Some social networks are built around particular issues. For example, MumsNet was set up for parenting, while www.harringayonline.com focuses on a neighbourhood in the London Borough of Haringey. These sites often facilitate connections between people who don't know each other from 'real life', but who may share a common interest.

Using social networks as a councillor requires a different approach to using it as an ordinary citizen. Many councillors use Facebook in a personal capacity in the same way as anyone else would – to share personal news, information and holiday snaps with people they already know. Other councillors use their Facebook accounts more openly, 'friending' (that is, by allowing them to view their accounts, sharing information with) people they don't know personally. Facebook now allows politicians to create 'pages' which is a way of keeping personal use and professional use separate. A 'page' is similar to a regular Facebook account in style, but it is open for anyone registered on Facebook to see. On a page you can provide a political profile and can share information with supporters without disclosing personal networks or worrying that the wrong people will see the 'funny' pictures of you as a child that your friends are showing each other.

Anyone on Facebook can start a group. Councillor Allan Andrews from Coventry started the Facebook group 'I Love Earlsdon' which has been used to discuss local issues and as a focus for very local campaigns. Other councillors and candidates have used Facebook to help organise their supporters during elections and there have been a number of successful issues based campaigns with popular Facebook groups. Some were started by councillors themselves, but others have been shown support as councillors join them and contribute.

C.Listening

Perhaps the most valuable use of social media is using it to listen (and perhaps engage) with conversations that are already happening. Your area, your council and maybe even you yourself are being talked about online, but do you know when and how that's happening?

Most interactive websites have something called RSS (Really Simple Syndication) feeds. This is a way that websites can automatically 'push out' new material as soon as it's published. This means you don't have to actually go a website to find out if there is new information on there; instead, the websites tell you with RSS. Free tools called feed readers (Google Reader and Bloglines are examples) can help you collect and subscribe to feeds in a single accessible place. Most mainstream media outlets have RSS feeds. Blogs and social networking sites almost always have them, too. You

can even generate an RSS feed from an internet search. Your council may have RSS feeds for its website (and if it doesn't, it should).

Google also allows you to set up something called an 'alert'. Instead of you having to type a specific word or phrase into Google each day to check if anything new has been written about it, the website sends you an email detailing all the new instances of that word online. Alerts can provide daily or instant news about local issues straight to your email inbox. You can set up alerts for the name of your council, your ward, hot local issues or even your own name.

Tools like Addictomatic and features within a Google account can help you bring all your feeds together into one place. These can be private so only one or a few people can see them, or you can make these pages public. 'Listening' to the social web will give you a more detailed picture of what people are concerned about. As a councillor, you will have to make a decision about how you act on that information.

D.Collaborative working

Wikipedia is the most famous example of people coming together to create a document or information resource. It is built with a tool called a wiki, which means anyone on the internet can go onto the site and add to or edit the content. Formby Parish Council has developed and consulted on its community plan using a wiki. This guidance itself was developed on a wiki.

But you don't have to set up a wiki to help people bring their ideas together online. Instead, you can also use social media to 'crowdsource' policy ideas and initiatives. Crowdsourcing is the internet equivalent of 'workshopping' an idea with the public. The White House under US President Barack Obama has used a collaborative tool called Mixed Ink to allow citizens direct access to the policy making process. Closer to home, the Mayor of London's office has launched a climate change consultation which calls for individuals to submit their own ideas and rate others people's. You can see this at: www.london.gov.uk/climatechange

E.Videos and pictures

Services like YouTube and Vimeo allow anyone to upload and share videos with the world. Image sharing services like Flickr, Picasa or SmugMug allow people to share photos. Many councils and councillors are using these services to share video diaries or images of their local areas.

Local people too are using these services to share content about the area you serve. There will almost certainly be a group on Flickr sharing positive and negative images of your area. Someone may be complaining about your council services on YouTube.

Stratford-on-Avon council has been a leader in using Flickr photos to promote its area. Another example is councillor Daisy Benson of the Redlands area of Reading who with her councillor colleague Glen Goodall has been using a Flickr group called 'Tagging isn't art, it's criminal damage' to highlight examples of graffiti in her area. She encourages residents to upload and share their photos as well with the aim of getting it removed.

Possible uses of social media for Councillors:

Providing information about services

In February 2010, the Society of Information Technology Management (Socitm) provided an audit of councils' social media usage and showed that 154 councils are using Twitter and 73 have Facebook pages. Some other uses of social media for services include:

• Staffordshire's RateMyPlace.org.uk, which provides food safety ratings for local people and a place for local people to share reviews of eateries.

• Islington's Facebook group, which is used to promote and share information about recycling in the borough.

• ManchesterLitList, a blog that provides information about literary events and featured books.

• Sutton Council providing information about grit bin locations which was mapped by a member of the public who is a web developer. The map was then hosted on Sutton's website informing residents of their locations so citizens could grit and clear icy pavements themselves.

• Many schools and councils used Twitter and easy to update blogs to alert parents of school closures during the heavy snow in January 2010.

Redbridge's Big Conversation provided a platform for local people to set priorities for spending and engage in policy discussion during a major borough-wide consultation, providing a place for local people to discuss issues. Just as you would consider what people are saying at area forums, councillors should take account of these discussions in their decision-making and can find that these platforms are a good way to explain why difficult decisions have been reached.

In the 2009 local elections, councils with integrated and interactive reporting (for example mixing traditional web communications with tools like Twitter or blogs) doubled traffic to their websites. (Source Socitm). Derbyshire County Council used a mix of online tools and channels to support and report local elections results in June 2009. This included multimedia web content, social bookmarking (a way of storing, sharing and recommending websites to others) and real-time results delivered through web graphics, Twitter and a dedicated Facebook page. Media interest was high and citizen feedback was extremely positive. Visitor levels to the council's website were the highest ever recorded.

Supporting local democracy

Gathering customer insight and managing customer relationships

Barnet Council is using social media monitoring tools to find out about conversations that are taking place online and tackle complaints about services. Greater Manchester Police are using social media monitoring to read what people are saying publicly online to identify and tackle fear of crime.

Some well-known commercial brands use communities of users to answer questions and resolve complaints, and several councils are beginning to experiment in this area. This has the potential to reduce transaction costs for the council and provide a more 'human' face to dealing with

bureaucracy. In Newcastle, engagement with a Facebook group critical of the council's perceived role in shutting down a popular nightclub helped to explain the issues around noise enforcement. As a result, one of the group's organisers met with council officials and the council has since advised a cooperative that aims to buy the bar.

Councillors will find that these tools provide a vital insight into what's going on in their communities and often allow them to engage directly with the key players.

Promoting culture

Medway Council is one of many that uses Facebook to promote festivals and events.

The London Borough of Wandsworth's film office uses Flickr, an image sharing social network, to promote film and television locations. Many museums, often local authority supported, are using a combination of social media tools to promote collections, events and special exhibitions. Councillors can support cultural events by joining Facebook groups or promoting them through their own social networking profiles. The council-run Facebook page for Coventry has over 11,000 fans

Supporting community cohesion, neighbourliness and resilience

There is strong evidence that online networking can promote better connected neighbourhoods. One American study showed that neighbours who were connected online were much more likely to talk to and engage with the people who lived near them 8.

Local networks like Harringay Online or Pits n Pots in Stoke-on-Trent provide an online platform for the views of local residents. Although these are usually independent websites, councillors can and should engage with these sites constructively.

Internal communications and learning and development

Many councils are using the tools of social media such as videos, blogs and internal social networks to support internal communications. Councillors can take advantage of these learning opportunities themselves and encourage the use of internal networks like Yammer (a corporate version of Twitter) within their councils and use them to reach a wide range of officers in their council or among partners.

Open data

Governments around the world are making efforts to open up their data and make it available for re-use. The US began with data.gov and the UK has upped the ante with the comprehensive (though not yet complete) data.gov.uk which focuses on central government data. Opening up data sets promotes the notion of a government responsible to the people it serves, giving them the tools of information and transparency to hold it to account. But there are other benefits, too, which include better interchange of information between public sector partners and the re-use of open government data to provide useful information and services to citizens.

Some councils are making strides with open data, notably Lichfield and the GLA and others are experimenting with some data sets. Barnet, Windsor and Maidenhead and a few others are experimenting with exposing data on all purchases over £500. Kent County Council has made more

than 500 data sets available online as part of its 'Pic and Mix' project. Visitors can browse the data catalogue and use online tools (known as mashups) to transform and personalise public data. This essentially means they can combine different statistics to make it useful to them in a variety of contexts.   Leicester City Council have just received funding from the LGA to make more Open Data available from our website.

This puts citizens in control of public information and avoids unnecessary contact with the council, Empowering citizens in this way means they can solve their own problems and become more engaged with their community. Early indications from US cities like San Francisco, Chicago and Washington, which have already opened their data, show that significant value can be created through open data and that savings can be achieved by reducing the cost of freedom of information requests.

Councillors can play a vital role in providing the assurance that's it's ok to put information in the hands of the people or use the data themselves to hold a range of public services to account.

Security Issues Relating to Social Media

Many social media sites offer the ability to link accounts – so that you can use one account to log into many sites and your smartphone.   While this makes using these sites more convenient, it increases the risk of identity theft or somebody taking over your account. For example, if you lose your Smart Phone or if your password is compromised somebody could post information on numerous websites as if they were you.

There is some very good guidance on this website: https://www.getsafeonline.org/social-networking/social-networking-sites/ and here: https://www.getsafeonline.org/protecting-yourself/cyberstalking/

In particular, here are some tips that will help to avoid common problems with Social Media:

- Use a strong password for all social media sites and webmail
- Use a different password for each site and where possible different usernames – guidance here: https://www.getsafeonline.org/protecting-yourself/passwords/
- Ensure your mobile device is encrypted and is protected with a password
- Don't use one Social Media account to log into too many other accounts
- Change the password on any webmail accounts frequently.
- Never login or enter personal or financial information on a website to which you have been directed from a link in an e-mail or a QR code.

Be aware of Phishing – a common trick is where the hackers impersonate one of the usual Facebook or Linkedin e-mails such as a friend request. The link in the e-mail goes through to a carefully crafted website that looks very much like the real thing and prompts you for your username and password in the normal way. It can be very hard to distinguish the fakes from the real thing.

If you have your own Blog or website – for example a WordPress site, it is very important that the underlying software is kept up to date and backed up. All content management systems (CMS), or any website for that matter, are vulnerable to hackers who try to exploit known vulnerabilities in the

system. Usually, updates to the software are quickly issued when security flaws are discovered. If these are applied the software will be safe.

Appendix D

Standards Committee 07.11.013: Complaints Update

Complaints received since 01.07.13

Case name/ number	Nature of complaint	Outcome	Date
2013/11	Councillor-on-Councillor complaint about behaviour at Ward meetings and within the Ward	Dismissed as being out-of-time, repetitious, or not covered by the Code of Conduct Review requested by complainant	Ongoing
2013/12	Ward Member not helping constituent with Housing and Health matters, despite assurances	Clarification sought from Member and complaint felt to be unfounded. Direct contact made by Member with constituent. Complaint dismissed	September 2013
2013/13	Member abusing position to influence private dispute	Initial enquiries being made – may be repetitious	Ongoing

This page is left blank intentionally.