

Governance Committee Agenda

2 February 2022 at 2pm

**Council Chamber, Civic Centre, Duke Street,
Chelmsford, CM1 1JE**

Membership

Councillor H. Ayres (Chair)

and Councillors

K. Bentley, N.A. Dudley, D.G. Jones, A.G. Thorpe-Apps, N.M.
Walsh and I. Wright

Parish Council Representatives

Councillor V. Chiswell (Great Baddow Parish Council)
Councillor P.S. Jackson (Great Waltham Parish Council)
**Councillor J. Saltmarsh (Woodham Ferrers and Bicknacre
Parish Council)**

Local people are welcome to attend this meeting, where your elected Councillors take decisions affecting YOU and your City. There is also an opportunity to ask your Councillors questions or make a statement. These have to be submitted in advance and details are on the agenda page. If you would like to find out more, please telephone Daniel Bird in the Democracy Team on Chelmsford (01245) 606523

email daniel.bird@chelmsford.gov.uk

Governance Committee

2 February 2022

AGENDA

1. Apologies for Absence

2. Minutes

To consider the minutes of the meeting held on 24 November 2021

3. Declaration of Interests

All Members are reminded that they must disclose any interests they know they have in items of business on the meeting's agenda and that they must do so at this point on the agenda or as soon as they become aware of the interest. If the interest is a Disclosable Pecuniary Interest they are also obliged to notify the Monitoring Officer within 28 days of the meeting.

4. Chair's Announcements

5. Standards Complaints 12 and 14/21 Investigation and Hearing Report

This item will determine the complaints made by way of a hearing pursuant to the procedure detailed at Part 5.1.2 Annex 5 of the Council's Constitution. In line with paragraph 6 of the procedure after the passing of an appropriate resolution the Committee will retire and consider the cases in question in consultation with the Independent Person before returning with their decision.

Please note that Annexes 3 and 4 of Appendix 3 and Appendix 4 contain confidential information under Paragraph 2 of part 1 of Schedule 12A to the Local Government Act 1972

Public interest statement: It is not in the public interest to disclose the content of these documents because the information in them is likely to reveal the identity of individuals. To do otherwise would establish a precedent for the future treatment of personal information.

6. Urgent Business

To consider any other matter which, in the opinion of the Chair, should be considered by reason of special circumstances (to be specified) as a matter of urgency.

MINUTES OF THE GOVERNANCE COMMITTEE

24 November 2021 at 7pm

Present:

Councillor N.A. Dudley (Chair)

Councillors H. Ayres, K. Bentley, D.G. Jones, N.M. Walsh and I. Wright

Also in attendance –

Parish Councillors V Chiswell and P Jackson

Independent Persons –
Mrs P Mills and Mrs C Gosling

1. Apologies for Absence

Apologies for absence were received from Councillor Thorpe-Apps and Parish Councillor Saltmarsh.

2. Minutes

The minutes of the meeting on 8 September 2021 were confirmed as a correct record.

3. Declarations of Interest

All Members were reminded to declare any Disclosable Pecuniary interests or other registerable interests where appropriate in any items of business on the meeting's agenda. None were made.

4. Public Question Time

No public questions were asked or statements made.

5. Chair's Announcements

No Announcements were made

6. Monitoring Officer Report

The Committee received a report updating them on recent standards complaints. It was noted by the Committee that the level of complaints being received continued to be high, with six being received since the June meeting. The Committee also heard that some complaints had nearly been fully investigated and it may be necessary for hearings to be scheduled soon. It was also noted by the Committee that four new linked complaints had recently been identified for investigation.

The Committee were also informed about the retention and destruction policy for Standards Complaints. It was noted that this had been brought in line with the Council's existing policies and would now be kept for six years from closure.

RESOLVED that;

1. the current statistical information as to complaints made be noted and published on the Council's website and;
2. the update concerning the application of the retention and destruction policy in relation to standards complaints be noted.

(7.02 pm to 7.07 pm)

7. Information Governance Update

The Committee received an annual update on the Council's approach to the assurance and management of information. The update covered the below areas;

- Statutory Requests
- Data Breaches
- Training and Awareness
- Cyber Security Review
- Policies
- Consents
- Privacy Notices
- Risk Management
- Phishing
- Data Mapping

It was noted by the Committee that in 2020/21 the Information Governance team had processed 796 requests, with 85% answered within statutory timescales. The percentage was slightly lower than the previous year but due to the pandemic this was still considered a good performance level. It was also noted that only one case was referred to the Information Commissioner's Office. The Committee also heard that the number of data breaches had decreased from 43% in 2019/20 to 22 in 2020/21. The Committee also heard about various training courses that had been completed by staff and members. It was also noted that a phishing exercise had

recently been run by the Information Governance Team to raise awareness for staff of the potential risks.

In response to a question from the Committee, it was noted that the Council's privacy notices and any marketing emails were on an opt-in basis.

RESOLVED that the report be noted.

(7.08 pm to 7.22 pm)

8. Complaints to the Local Government and Social Care Ombudsman – Annual Review

The Committee considered a report containing information on the number of Ombudsman complaints received by Chelmsford City Council over the last year. A letter from the Local Government Ombudsman dated 21 July 2021 and summaries of the Council's performance were attached as appendices 1-2 to the report.

The Committee noted that they were pleased to see no complaints had been upheld against the Council during the year.

RESOLVED that the report be noted.

(7.23 pm to 7.27 pm)

9. Senior Responsible Officer's report in relation to the Council's RIPA arrangements

The Committee considered a report updating them on the Council's RIPA arrangements. The Committee noted that a significant review of RIPA arrangements had been undertaken in 2020 and this year's review had only led to minor updates. It was noted that this was just due to a change in personnel which had been dealt with administratively by issuing an updated policy. The Committee also noted that RIPA policies along with training needs would continue to be reviewed annually with any ongoing actions through the RIPA officer working group.

RESOLVED that the report be noted.

(7.28 pm to 7.31 pm)

10. Annual Whistleblowing Report

The Committee received a report updating it on the operation of the Council's Whistleblowing Policy and Procedure. It was noted by the Committee that 12 reports had been made. It was also noted by the Committee that six of these were not valid whistleblowing complaints as they related to alleged wrongdoing by third parties not connected to the Council.

RESOLVED that the report be noted.

(7.32 pm to 7.35 pm)

11. Work Programme

The Committee received a report updating them on their work programme. It was noted that some items had been moved due to the extra meeting in February to further consider the Community Governance Review. It was also noted by the Committee that the Constitution review would likely be moved to a later meeting and that there was the potential for one or two standards hearings early in the new year. The Committee were informed that they would be contacted once some provisional dates for the hearings were available.

RESOLVED that the report be noted.

(7.36 pm to 7.40 pm)

12. Urgent Business

There were no items of urgent business.

The meeting closed at 7.40pm.

Chair



Chelmsford City Council Governance Committee

2 February 2022

Standards Complaints 12 & 14/21 Investigation and Hearing Report

Report by:
Monitoring Officer

Officer Contact:
Lorraine Browne, Legal & Democratic Services Manager & Monitoring Officer,
lorraine.browne@chelmsford.gov.uk, 01245 606560

Purpose

To hear two complaints relating to alleged breaches of the Broomfield Parish Council Code of Conduct by Cllr Wendy Daden.

Recommendations

1. To consider and determine whether there have been breaches of the code of conduct by Cllr Wendy Daden and if so what, if any, action should be taken.
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1. Background

- 1.1 Two complaints were received by the Monitoring Officer in February 2021, one by a single councillor at the parish council (subsequently resigned) and a further joint complaint by all remaining parish councillors. The allegations made arose from similar issues and the Monitoring Officer decided (in consultation with an Independent Person) to refer both complaints for investigation together by an external investigator.
- 1.2 The investigator reported back their views concerning individual items of complaint as to whether each allegation amounted to a breach of the code of conduct or not. Members are asked to hear and determine whether there has been any breaches of the parish councillors code of conduct (and if so any appropriate action that should be taken) in respect of those allegations where the investigator concluded there has been a breach of the Code of Conduct.

2. Alleged breaches to be considered by Committee

- 2.1 The complaints against Cllr Daden are set out within an investigator's report which can be found at Appendix 3. For ease of reference there are 3 alleged breaches of the Code of Conduct in respect of which members need to reach a determination as follows- whether the councillor :
- 1. brought the Parish Council into disrepute by comments on social media during and around 3rd February meeting (point c in paragraph 1.2 of the investigation report);
 - 2. failed to register her interest in relation to Broomfield Bridges association (point d in paragraph 1.2 of the investigation report) and failed to declare that interest as required;
 - 3. misreported third-party discussions to the Parish Council's Planning Committee (point e in paragraph 1.2 of the investigation report).
- 2.2 The external investigator's report provides an overview of the complaints together with the background and the conclusions reached in relation to each allegation. The report also deals with alleged breaches of internal parish procedure which link with code of conduct allegations and there is one allegation where the investigator concluded there has been no breach of the code of conduct. There is no need for members to make formal determinations in relation to these (points a and b in paragraph 1.2 of the investigation report).

3. Relevant procedures

- 3.1 The determination of complaints alleging breaches of the code of conduct by members is governed by the Complaints Procedure at Part 5.1.2 of the Constitution. This provides that the Monitoring Officer will review every complaint received and will consult an Independent Person before taking a decision to investigate a complaint.
- 3.2 The Committee should conduct a hearing to receive the report of the Investigating Officer and to hear the representations of the Councillor against whom the allegations are made. Before reaching decisions on the complaints the advice of the Independent Person must be sought.
- 3.3 If the Committee decides that there has been a breach of the code of conduct it must consider what, if any, action to take. Before reaching a decision the advice of the Independent Person must be sought.
- 3.4 The Monitoring Officer has also attached at Appendix 4 the original content (which was further updated after the Monitoring Officer contacted the councillor) from Cllr Daden's website in relation to this complaint. This is not being raised as a fresh item of complaint for members to reach a formal decision in relation to and councillors are entitled to make public, details of complaints that are lodged against them. It is provided by way of further background for consideration in the event that the committee reaches a decision that there has been a breach of the code of conduct. It is included in Part 2 due to the social media postings of various parties.

List of Appendices

Appendix 1 – Hearing Procedure for standards complaints

Appendix 2 - Broomfield Parish Council Code of Conduct

Appendix 3 – Independent investigation report

- Annex 1 – Relevant Minutes
- Annex 2 – Other Documents

The Documents listed below contain confidential information, under Paragraph 2 of Part 1 of Schedule 12A to the Local Government Act 1972.

Public interest statement: It is not in the public interest to disclose the content of these documents because the information in them is likely to reveal the

identity of individuals. To do otherwise would establish a precedent for the future treatment of personal information.

- *Annex 3 – Other documents*
- *Annex 4 – Screenshots*

Appendix 4 – extract from councillors website

Background papers:

Nil

Corporate Implications

Legal/Constitutional: These are set out in the report

Financial: None

Potential impact on climate change and the environment: None

Contribution toward achieving a net zero carbon position by 2030: None

Personnel: None

Risk Management: None

Equality and Diversity: Complaints are monitored to ensure that there is no disproportionate dissatisfaction by the different equality target groups. This data is considered as part of the assessment process to ensure that there is no discrimination in service delivery.

Health and Safety: None

Digital: None

Other: None

Consultees: None

Relevant Policies and Strategies:

Complaints Procedure

PART 5.1.2 ANNEX 5

GOVERNANCE COMMITTEE HEARING PROCEDURE

<u>ITEM NO.</u>	<u>PROCEDURE</u>	<u>NOTES</u>
1.	<p><u>Quorum</u></p> <p>1.1 Three voting members must be present throughout the hearing to form a quorum.</p> <p>1.2 Where the complaint refers to a Parish Councillor a co-opted Parish Councillor of the Governance Committee should be present.</p> <p>1.3 The Governance Committee shall nominate a Chair for the meeting, where neither the Chair nor Vice Chair of the Committee are in attendance.</p>	
2.	<p><u>Opening</u></p> <p>The Chair will-</p> <p>2.1 Explain the procedure for the hearing and remind all parties to turn off mobile phones, audible alarms and pagers, or other equipment that either is capable of recording the meeting or interrupting proceedings.</p> <p>2.2 Ask all present to introduce themselves.</p> <p>2.3 Ask the Councillor against whom the complaint has been made ("the subject Councillor"), or their representative, whether they wish to briefly outline the subject Councillor's position.</p>	

3.	<p><u>The Complaint and Investigator's Findings</u></p> <p>3.1 The Investigating Officer will be invited to present their report, including any documentary evidence or other material, and to call any witnesses they require.</p> <p>3.2 The subject Councillor, or their representative, may question the Investigating Officer upon the content of their report and any witnesses that have been called about the evidence they have provided.</p> <p>3.3 Members of the Committee may question the Investigating Officer on the content of their report and comments made to the Committee as well as any witnesses present.</p>	<p>3.1.1 The report and other information referred to must be based on the complaint made to the Council and no new points will be allowed.</p> <p>3.2.1 This is the subject Councillor's opportunity to ask questions arising from the Investigator's report only and not to make a statement</p>
4.	<p><u>The Councillor's Case</u></p> <p>4.1 The Subject Councillor or their representative may present their case and call any witnesses in support.</p> <p>4.2 The Investigating Officer may question the subject Councillor or witnesses.</p> <p>4.3 Members of the Committee may question the Subject Member or witnesses.</p>	<p>4.1.1 Only evidence related to the information in the Investigator's Report will be allowed, not new evidence or issues.</p>
5.	<p><u>Summing Up</u></p> <p>5.1 The Investigator may sum up the Complaint.</p> <p>5.2 The Member or their representative may sum up their case.</p>	
6.	<p><u>The Decision</u></p> <p>6.1 The Committee will leave the room to consider the case presented in consultation with the Independent Person,</p>	<p>6.1.1 This will include voting and non-voting co-opted members of the Committee</p>

	<p>if present, and may request the Monitoring Officer or other legal advisor to the Committee to accompany them.</p> <p>6.2 On the Committee's return the Chair will announce the Committee's decision, namely that either-</p> <ul style="list-style-type: none"> • The Committee decides that the subject Councillor has failed to follow the Code of Conduct; or • The Committee decides that the subject Councillor has not failed to follow the Code of Conduct; and • The Committee will give reasons for its decision. <p>6.3 If the Committee decides that the subject Councillor has failed to follow the Code of Conduct, it will then hear from the Investigator and the subject Councillor or their representative as to-</p> <ul style="list-style-type: none"> • Whether any action should be taken in relation to the subject Councillor, and if so • What form that action should take; and • Whether any recommendations should be made to the Council, or where appropriate the Parish or Town Council, with a view to promoting high standards of conduct amongst Councillors. <p>6.4 The Committee will leave the room to consider these representations and to decide what if any action should be taken, in consultation with the Independent Person, if present, and may request the Monitoring Officer or other legal advisor to the Committee to accompany them.</p> <p>6.5 On the Committee's return the Chair will announce the Committee's decision.</p> <p>6.6 The Chair will confirm that a full written decision shall be issued within 10 working days following the hearing and that the Committee's findings will be published as</p>	<p>6.4.1 & 6.5.1 Where the subject Councillor is a Parish or Town Councillor the Committee can only make recommendations to the Parish or Town Council as to the action that it feels appropriate.</p> <p>6.6.1 This will include the publication of a decision on the Council's website and</p> <p>6.6.2 A copy will be sent to</p>
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	appropriate.	the subject Councillor, complainant(s) and where appropriate the relevant Parish or Town Council.
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BROOMFIELD PARISH COUNCIL

CODE OF CONDUCT FOR COUNCILLORS

ADOPTED 18.7.2012

Broomfield Parish Council

Code of Conduct for Councillors

1. Application of the Code

This Code of Conduct applies to you whenever you are acting in your capacity as a member or co-opted member (referred to in this Code as “Councillors”) of the Broomfield Parish Council including-

- 1.1 At formal meetings of the Council, its Committees and Sub-Committees, and other meetings at which business of the Council is discussed.
- 1.2 When acting as a representative of the Council.
- 1.3 In discharging your functions as a Councillor.
- 1.4 At briefing meetings with officers.
- 1.5 At site visits or other visits to do with the business of the Council.
- 1.6 When corresponding with the Council other than in a private capacity.

2. General Conduct

You must-

- 2.1 Provide leadership to the Council and communities within its area, by personal example.
- 2.2 Respect others and not bully any person.
- 2.3 Recognise that officers (other than political assistants) are employed by and serve the whole Council.
- 2.4 Respect the confidentiality of information which you receive as a Councillor by-
 - 2.4.1 Not disclosing confidential information to third parties unless required by law and only then after receiving confirmation from the Monitoring Officer to do so ; and
 - 2.4.2 Not obstructing third parties legal rights of access to information.
- 2.5 Not conduct yourself in a manner which is likely to bring the Council into disrepute
- 2.6 Use your position as a Councillor in the public interest and not for personal advantage.
- 2.7 Accord with the Council’s reasonable rules on the use of public resources for private and political purposes.
- 2.8 Exercise your own independent judgement, taking decisions for good and substantial reasons by-
 - 2.8.1 Attaching appropriate weight to all relevant considerations including, where appropriate, public opinion and the views of political groups.
 - 2.8.2 Paying due regard to the advice of officers, and in particular the Monitoring Officer and Clerk to the Council.
 - 2.8.3 Stating the reasons for your decisions where those reasons are not otherwise apparent.

- 2.9 In your decisions and actions apply the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership and, as far as reasonably possible, assist the Council to act within the law.

3. Disclosable Pecuniary Interests

You must-

- 3.1 Comply with the statutory requirements to register, disclose and withdraw from participating in respect of any matters in which you have a disclosable pecuniary interest (see **Annex 1**), and specifically,
- 3.1.1 Ensure that your entries in the register of interests are kept up to date and notify the Monitoring Officer in writing, via the Council's Clerk, within 28 days of becoming aware of any change in respect of your disclosable pecuniary interests.
- 3.1.2 Make verbal declarations of the existence and nature of any disclosable pecuniary interest at any meeting at which you are present where an item of business affects or relates to the subject matter of that interest is under consideration, at or before the consideration of the item of business or as soon as that interest becomes apparent.
- 3.1.3 Withdraw from any meeting at which you have a disclosable pecuniary interest during the entire consideration of that item, unless a dispensation has been granted.
- 3.2 "Meeting" means any meeting organised by or on behalf of the Council and in particular in the circumstances as set out in paragraph 1 of this Code.

4. Other Interests

- 4.1 In addition to Paragraph 3, if you attend a meeting and there is an item of business to be considered in which you are aware you have a non-disclosable pecuniary interest or non pecuniary interest, you must make a verbal declaration of the existence and nature of that interest at or before the consideration of the item of business or as soon as that interest becomes apparent.
- 4.2 You have a non-disclosable pecuniary interest or non pecuniary interest in an item of business of your Council where-
- 4.2.1 A decision in relation to that business might reasonably be regarded as affecting the well-being or financial standing of you or a member of your family or a person with whom you have a close association to a greater extent than it would affect the majority of the Council Tax payers, ratepayers or inhabitants of the ward or electoral area for which you have been elected or otherwise of the Council's administrative area;

4.2.2 Relates to an interest concerning either of the following-

4.2.2.1 Any person or body who employs or has appointed you;

4.2.2.2 Any contract for goods, services or works made between Broomfield Parish Council and you or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description that would create a disclosable pecuniary interest but only where it has been fully discharged within the last 12 months.

5. Gifts and Hospitality

- 5.1 You must within 28 days of receipt, notify the Monitoring Officer in writing of any gift, benefit or hospitality with a value in excess of £50, which you have accepted as a Councillor from any person or body other than the Council, including the name of the donor.
- 5.2 The Monitoring Officer will place your notification on a public register of gifts and hospitality.
- 5.3 The duty to notify the Monitoring Officer does not apply to a gift, benefit or hospitality that comes within any description approved by the Council for this purpose.

REPORT TO CHELMSFORD CITY COUNCIL REGARDING COMPLAINTS AGAINST A BROOMFIELD PARISH COUNCILLOR

1. EXECUTIVE SUMMARY

- 1.1. This Report addresses two separate conduct complaints made against Cllr Wendy Daden, a Broomfield Parish Councillor. The first complaint is brought by a (then) fellow councillor (the “**Sole Complaint**”); the second is brought jointly by all of the parish councillors including the first complainant (the “**Group Complaint**”). Both complaints relate to the same set of events, namely Cllr Daden’s conduct in relation to the Parish Council’s consideration of a proposal to fund a youth club in Broomfield.

The complaints

- 1.2. In summary, the allegations in the two complaints are that Cllr Daden:
- a. Communicated with parishioners in breach of the Parish Council’s social media policy;
 - b. Disclosed confidential commercial information prior to and/or during a Parish Council meeting on 3 February 2021;
 - c. Brought the Parish Council into disrepute with the local community via comments on social media during and around the 3 February meeting;
 - d. Failed to register her interest in an organisation whose business could be affected by the outcome of the youth club proposals; and
 - e. Misreported third party discussions to the Parish Council’s Planning Committee.
- 1.3. A further allegation of bullying and inappropriate conduct towards other councillors was raised in one of the written complaints, but following discussions with the relevant complainant I am informed this is no longer pursued. Similarly, I was informed by both sets of complainants that Cllr Daden’s conduct prior to the specific events complained of here had caused them concerns. However, as no detailed allegations were made regarding that prior conduct, I have not relied on this to reach my conclusions.
- 1.4. Finally, I was informed that in 2020 Cllr Daden was previously the subject of an informal complaint in respect of her Parish Council role, regarding her use of social media. I am informed that Cllr Daden apologised and no formal steps were taken.

This Investigation

- 1.5. My investigation has comprised the following:
 - a. Review of the complainants' written submissions;
 - b. Interviews with Ms McKie, the sole complainant (21 May 2021), Margaret Bleet as representative of the Group complainants (18 May 2021) and Cllr Daden (11 October 2021), and follow-up emails with each of these parties;
 - c. Review of the social media messages (received as screenshots, **Annex 4**) and other documents received from the parties (**Annexes 2 and 3**); and
 - d. Review of relevant minutes of the Parish Council meetings (**Annex 1**).
- 1.6. I have considered the allegations in the light of CCC's Complaints Assessment Criteria.

Summary Findings

- 1.7. The backdrop to the complaints is a project for construction of a youth centre, which the Council intends to fund using CIL money. Cllr Daden has stated to me that she has reservations about the scope and future viability of the project as currently developed. This appears to be in contrast with the rest of the Councillors who support progressing towards construction.
- 1.8. At the outset I observe that this disagreement is not in itself a breach of Cllr Daden's conduct obligations. Instead, the allegations of breach concern the way in which Cllr Daden has conducted herself in relation to the project.
- 1.9. My findings in summary in respect of each of the live allegations above are as follows:

- a. Public Communications in breach of policy

Breach found: Cllr Daden invited the public to the meeting in a form that appeared to speak for the Council, but presented the matter for discussion in a way which did not represent the Council's views of the cost options, and which appeared to take a different view of the Angel Pavilion as an alternative. Cllr Daden also posted a message inviting rival bidders to present bids for the Youth Centre works.

- b. Disclosure of Confidential Information

Breach not found: on the evidence, I cannot establish that the price information disclosed was clearly to be kept confidential.

The price information which Cllr Daden provided, and the timing of that disclosure, formed the subject of angry accusations against the Council. I

am informed that the price information which Cllr Daden circulated had only recently been provided to the councillors themselves, and so there was arguably little time for discussions between Councillors about whether to pre-publicise any financial information. However, I also note that if Cllr Daden had contacted the clerk before posting the information - which would have been more correct under the Code - the public disquiet could have been reduced, or avoided. It may be that the same or similar price information might have been disclosed (subject to confidentiality as applicable) but that better context would have been provided.

c. Bringing Council into disrepute

Breach found: I consider that Cllr Daden brought the Council into disrepute by circulating to her Facebook account a link to the Jackie Weaver video, and by her comments on it. She did so again by appearing to endorse public accusations that Council members were engaged in corruption.

I am told by Cllr Daden that the corruption suggestion (whether her fellow councillors had won the lottery) was meant tongue in cheek, and I have been shown a similar reference to lottery-winning in a related message. However, although this may have been her subjective intention, the question whether conduct brings the Council into disrepute must be assessed objectively.

d. Declarations of Interest

Breach found: Cllr Daden's involvement with the Bridges organisation, and more broadly her support of its basic proposals, was known to the Council, but should have been formally declared in ongoing meetings.

e. Misreporting of external discussions to a Parish Council meeting

Breach found: on balance, I consider that Cllr Daden's report to the Planning Committee did not comply with the Code requirement of openness.

1.10. Cllr Daden has made a counter-allegation of bias against other councillors. However:

- A. I have reviewed documents supplied by Cllr Daden in connection with this, but I cannot see that this is evidence to support the counter-allegation. I note that the sole complaint and the group complaint also overlap, and there is no allegation of bias against the sole complainant.
- B. I have assessed the allegations principally on the basis of reviewing the social media posts of Cllr Daden and other contemporaneous social media records. Accordingly, I have not had to rely substantially on subjective

accounts of events, or on third party accounts which Cllr Daden has been unable to give her own views.

2. BACKGROUND

Councillor Daden

- 2.1. Cllr Daden has been a Parish Councillor since 2014 (co-opted July). She has been a Councillor on Chelmsford City Council since May 2019.

The Youth Centre Proposal

- 2.2. In mid-2020, the Parish Council was made aware that Community Infrastructure Levy (“**CIL**”) funds of £140,000 were available from Chelmsford City Council for capital funding.
- 2.3. Previously in 2019, the Parish Council had been approached by Springfield Youth Club regarding the creation of a youth club in Broomfield. The Parish Council formed a working group and consulted the local school, Essex County Council and others.
- 2.4. From July 2020 onwards the CIL funding and the proposal were a regular item of business in each Council meeting. In the July 2020 meeting, it was agreed that the Working Group would be formed. In August, the Council passed a resolution to fund further work. In September 2020, an indicative estimate for the project of £100,000 was noted. Cllr Daden attended each of these meetings.
- 2.5. In November 2020, the Council resolved unanimously (with Cllr Daden in attendance) as follows: *“The council approves for submission to Contract Finder, a draft specification for a 6-bay demountable installed and fully connected with a full turnkey solution.”*
- 2.6. In December 2020, the Council noted that *“the proposal was placed on contract finder and six companies expressed their interest. Only one [Wernick] had a specific proposal which met the requirements of specification.”* Accordingly, the Parish Council *“agreed that Wernick would be invited to produce a firm proposal for installation on the David Smith field.”* Cllr Daden was again in attendance, and no objection to this item is recorded.
- 2.7. The progress of the proposal has also been the subject of detailed blogs by the Chairman on the Parish Council website since August 2020. It has been covered in the Broomfield Times (I am informed by Cllr Daden this was only one occasion).
- 2.8. Accordingly, as at February 2021:
- a. The Council had followed a structured approach to considering the Youth Centre proposal and obtaining quotations;

- b. Consultation had involved Essex County Council, Chelmsford City Council and Chelmer Valley High School (the local school), and the local MP;
- c. The progress of the proposal had been regularly debated in Council meetings, and had been put to votes;
- d. The proposal had been covered in the parish press (Broomfield Times Autumn 2020 edition).

2.9. Cllr Daden has commented to me as follows on the above history:

- a. The progress of the working group was and is not fully shared with the rest of the council: no minutes are circulated.
- b. The initial proposal within the Parish Council for youth provision started off as a “summer house” that would cost ca. £5,000.
- c. In September 2020, when the £100,000 was mooted, she started asking for a fuller business case. In particular, she had expected that there would be consideration of the “sustainability” of the centre, for example in terms of ongoing operating costs. The proposed site was also very prominent in the village - the field it was going on was charity land - and so would need careful consideration, in particular in relation to aesthetics.
- d. In the November 2020 meeting, she approved going out to tender, on the assumption that this would produce quotations for discussion, and the Council were still at business plan stage. The minutes of the meeting record that the location had not been finalised.
- e. In the December 2020 meeting, she “*went on the advice put forward*” and so said yes to further exploring Wernick’s proposal. She understood that the proposal would be used to explore further the scope of the project.
- f. As at February 2021, the location, design and aesthetics remained undefined.
- g. Other bidders appear to have been put off from bidding by the lack of definite information about the project scope: I have been provided with email chains in which five other companies expressed interest in the opportunity and requested tender information, who were told by the clerk that the Council could not provide more detail, and was “*entirely in [the company’s] hands*” as regards permissions, design, installation and connection.

- h. The consultation and concept development, and the business plan, were limited as follows:
 - i. The youth club in Springfield was very successful, but ran for only 1 night per week in Springfield Village Hall, and was located in an area with two to three times as many teenagers;
 - ii. There were five other secondary schools within 2.3 miles of the proposed youth centre which were attended by some of the residents. They were not consulted.
 - iii. The Chelmer Valley school survey (108 responses out of 1300 pupils) had found that 85% of respondents wanted a gym, 38% wanted a recording studio, and other requirements. This is also recorded in a note from Donna Hance dated 15 February 2021. I understood from Cllr Daden that it was not clear whether these facilities could be provided or maintained, and so the survey results might be misleading.
 - iv. Cllr Daden understood that residents had not been consulted directly as a group.
 - v. Other facilities were potentially available, such as the Village Hall (which was unused on Friday and Saturday evenings), and the library next to the field.
 - vi. Cllr Daden was unaware if the working group had considered what scouts/guide groups were doing which might be related.
- i. Cllr Daden understood the business for the 3 February meeting would be to discuss the Wernicks quote and specification, how the building would last, to find out exact costs, and to provide a basis for making a decision whether the Council could take their proposal forward.
- j. Her recollection was that the cost discussed up to that point was £100,000, and the £200,000 option was announced that evening, and she subsequently updated her post.
- k. *"It wasn't communicated to [the Parish Council] what had been established and what we were going to fill this facility with."*
- l. She believes that at the meeting the Council backtracked on its intention to progress the proposal, in light of the public response: the motion at the end was to defer.

Angel Pavilion

- 2.10. Angel Pavilion is a café near to the Parish Council's building. It has a large function room next door. Cllr Daden informs me that in or around September 2016 the owner of Angel Pavilion said she was considering laying on youth facilities, but has not pursued this further.

- 2.11. There is an ongoing legal dispute between Angel Pavilion's owner and the Parish Council in relation to access. Some of the history of relations with the Angel Pavilion is contained in the November 2019 minutes.
- 2.12. Cllr Daden stated to me that she has no view on whether the Angel Pavilion would be a viable site for a youth centre because the owner had not taken it forward, and because "*it will be down to the youth to decide if it works*" for them.
- 2.13. In Cllr Daden's view it was inconsistent of the Parish Council to refuse access to Angel Pavilion, thereby in her view actively preventing youth facilities from being developed since 2016, "*and now we are saying that we have to build provision right here right now.*"

Social Media pages

- 2.14. The Parish Council has its own social media page on Facebook. This has historically been little used by the Council.
- 2.15. Broomfield residents have set up, and continue to operate, their own Facebook page named "Broomfield and the Walthams Hub". Parish Councillors will from time to time post on that page, for example to publicise the Council's meeting agenda. The Complainants and Cllr Daden disagree whether any Councillors other than Cllr Daden are regularly active on the Broomfield and the Walthams page.

3. RELEVANT CONDUCT STANDARDS

- 3.1. Section 27(1) Localism Act 2011 requires a relevant authority "*to promote and maintain high standards of conduct by members and co-opted members of the authority*". By subsection (2), in discharging this duty a relevant authority must adopt a code of conduct dealing with the conduct that is expected of members when they are acting in that capacity. Section 28(1) of the Localism Act requires that the code adopted is consistent with the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- 3.2. Parish Councillors are required to comply with the following policies:
 - a. The Parish Council's Code of Conduct;
 - b. The Code of Conduct of Chelmsford City Council¹ (the key provisions of which are identical to the Parish Council's Code);
 - c. The Parish Council's Social Media Policy; and
 - d. The Parish Council's Financial Regulations.

¹ <https://www.chelmsford.gov.uk/resources/assets/inline/full/0/29456.pdf>

3.3. The relevant sections of these codes are referred to in the findings below.

4. ALLEGATIONS AND FINDINGS

4.1. A number of the allegations are directly related to specific social media posts made by Cllr Daden. Annex 4 to this Report is a table containing those posts and relevant public replies.

4.2. For simplicity, I have set out here my conclusions in relation to each allegation.

Confusion of personal views and Parish Council via social media

4.3. The Parish Council's Social Media Policy states that "*Parish Councillors cannot speak for the Council unless explicitly authorised by a resolution made in Council. Councillors may speak as individuals, but care must be taken to ensure that a reasonable person could not assume that they are speaking on behalf of the Council and that their personal social media publications are clearly different from any similar official Council social media.*"

4.4. There are two posts which are relevant here: firstly, a post publicising the 3 February meeting; and secondly, a post on or around 1 February inviting rival bids to Wernicks.

A. Publicising the 3 February meeting

4.5. In a post on 1 February on the Broomfield Facebook page, Cllr Daden invited the public to attend the Parish Meeting on 3 February as follows:

*'YOUTH PROVISION IS CERTAINLY COMING TO BROOMFIELD
PARISH MEEETING WEDNESDAY 3rd FEBRUARY 19.30*

When Angel Pavilion presented the business plan to the parish council, it included youth provision. I am delighted to see this facility is now open, young people are very welcome and AP is actively creating a space for young people.

The parish council is also proposing a new facility for young people on the field behind the astro (pictured to scale 18metres x9,5); The cost of the demountable is approx £200,000.

21/25. To consider proposal for construction of Youth Centre on David Smith Field

- *Introduction from Parish Council: aims and requirements*
- *Introduction from Wernicks [to confirm above]:*
- *Planning issues*
- *positioning and connection to utilities.*
- *Outline project plan*
- *Questions*
- *Wernicks depart*

Motion: Council approves the appointment of Wernicks to supply and fully install a demountable building for use as a Youth Centre.

Motion. The Council approves the <state agreed location> to position the Youth Club building and authorises the Clerk to instruct Wernicks to proceed.

To have your say or to hear more details please join the zoom meeting.

- 4.6. The clear impression from the wording of this post is that Cllr Daden is acting as spokesperson for the Council: the post sets out the agenda, the background to the youth centre proposal and the proposed resolution, and invites the public to “have your say or to hear more”. However, the clerk of the Council and other councillors were not consulted prior to the post.
- 4.7. In addition, the post contains a strong endorsement of the Angel Pavilion as a youth provision (Angel Pavilion is the first topic, and Cllr Daden is “delighted” with it).² It would therefore be reasonable for a member of the public to question whether an additional youth centre might be superfluous, and Cllr Daden has subsequently confirmed that her view at the time was that it might be superfluous. However, the other members of the Parish Council did not consider that Angel Pavilion represents adequate alternative youth provision for various reasons.³
- 4.8. This post conflicts with the Parish Council Social Media policy:
 - a. it was not authorised by the Parish Council; and
 - b. it is not expressed in language that differentiates Cllr Daden’s views from the Council as a whole.

Content of the Message

- 4.9. Substantively, the post appears to conflict with the Council’s position vis-à-vis the use of Angel Pavilion. The complaints also allege that the post is inaccurate or misleading, as addressed below, and creates a risk of confusion on the part of the public as regards what options are under consideration.
- 4.10. Cllr Daden informed me that prior to the 3 February meeting, she thought that its purpose was to discuss the Wernicks quote and specification, how the building would last, to find out exact costs, and to provide a basis for making a decision whether the Council could take their proposal forward. She added that she was shocked when the Chair opened the meeting and said something like

² Cllr Daden has separately told me that she is disappointed that the owner of Angel Pavilion has not progressed her earlier proposal to develop youth facilities, but that she has no view on whether such facilities would in fact turn out to be popular, as they would need to first be provided. While I have no reason to disbelieve her, in my opinion this is not the impression that the post conveys to an objective observer.

³ See the Chairman’s blog following the February meeting: <https://www.broomfieldsex.co.uk/chairmans-blog/>

“lovely to see you, this will happen”, and that the building would almost certainly be on the playing field.

- 4.11. This appears to conflict with what Cllr Daden’s message says, as it quotes the motions as follows:

Motion: Council approves the appointment of Wernicks to supply and fully install a demountable building for use as a Youth Centre.

Motion. The Council approves the <state agreed location> to position the Youth Club building and authorises the Clerk to instruct Wernicks to proceed.

Basis of communication

- 4.12. In my meeting with her, Cllr Daden referred me to the disclaimer at the top of her Facebook page, which states: “*This page, run by a Mum living in Broomfield Essex, does not represent views of any organisation*”. In my view, this is not a realistically sufficient precaution to achieve compliance with the policy; in any event, in the current case, Cllr Daden was commenting within another Facebook page, and so readers would not have seen the disclaimer.
- 4.13. Cllr Daden referred me to the Standing Orders of the Parish Council, which allow “a person” (whether a councillor or otherwise) to “report” the proceedings in real time. In my view, the social media policy applies more closely to these circumstances, and takes precedence over the standing order.
- 4.14. Cllr Daden also referred me to approving messages from the former Chair (Cllr Barnes) in relation to a social media post by her. It is not clear to me whether this relates to her Chelmsford City Council role, however.
- 4.15. Finally, Cllr Daden has also stated that her “*understanding is hundreds of politicians do not post a disclaimer on every post and comment, just on the leading page.*” However, Members of Parliament (for example) are not subject to an equivalent policy.
- 4.16. In mitigation, Cllr Daden has provided me with copies of emails from 2019 and late 2020 in which she raised with the former Chair her concerns over the adequacy of internal information-sharing and external communications by Councillors. Cllr Daden has also provided me with screenshots of messages from Cllrs McKie and Hubble advertising Council business via social media, but I am unable to say whether or not these were sent with the prior approval of the clerk or the Council.
- 4.17. For completeness, the current LGA Guidance on the Model Code of Conduct (the **Guidance**) states that an individual will be acting in their capacity as councillor where “*your actions would give the impression to a reasonable member of the public with knowledge of all the facts that you are acting as a councillor. ... There is no formal description of what the role of a councillor is,*

but aside from formal local authority business it would include promoting and representing the local authority in the local community and acting as a bridge between the community and the local authority.” The Guidance also points out that how a councillor describes themselves in their posting, or at the top of their page or in their username or profile, does not determine whether a given post is covered by the Code.

B. Invitation to rival bidders

- 4.18. I have been shown a post on or around 1 February 2021 (i.e. prior to the meeting), in which Cllr Daden stated:

“The proposed demountable building is the only costs and proposal that has come to full council to consider. The cost has escalated considerably. Is there a builder that could rival this price? Create something more aesthetically pleasing – cheaper alternatives – public I challenge you.” [emphasis added]

Two alternative price breakdowns are set out, totalling £170,000 and £200,000.

- 4.19. It is complained that this breaches procedure. The Financial Regulations (section 11) prescribe a formal process for contracting, which involves an invitation to tender, bidders’ bids being opened at the same time, and assessed against each other.
- 4.20. As set out above, I have seen messages from potential rival bidders that expressed tentative interest in the project, and I understand that Cllr Daden feels this should have been further explored.
- 4.21. However, it is contrary to the Financial Regulations for a Councillor to publicise the price offered by a bidder for a contract and publicly invite other contractors to bid against it. Cllr Daden was aware from previous Council meetings that a formal contracting process had been followed. I understand that this post did not have the prior agreement of the clerk or the Council.
- 4.22. Accordingly, I consider that both of these incidents are breaches of the social media policy; the second is also a breach of the Financial Regulations.

Disclosure of Confidential Information

- 4.23. Paragraph 2.4 of the Parish Council Code provides that Councillors:

“must ... respect the confidentiality of information which you receive as a Councillor by (2.4.1) not disclosing confidential information to third parties unless required by law and only then after receiving confirmation from the Monitoring Officer to do so.”

- 4.24. Cllr Daden’s 1 February post states that the proposal under consideration by the Parish Council would cost £200,000, and that the motion before the Council

is to commit to spend that amount. Cllr Daden's separate post inviting rival bids contains breakdowns for both a £170,000 option and a £200,000 option.

- 4.25. The complainants consider that the £200,000 figure was confidential and should not have been publicised by Cllr Daden. By extension, this would apply to the breakdown costings.
- 4.26. The complainants also state that the £200,000 cost had not been accepted by the Council, and its position was that any increase above the £140,000 would need to be discussed; accordingly, it is complained that the post was misleading as regards the expenditure which the Council was contemplating.
- 4.27. I have not seen evidence as to whether or not Cllr Daden had been informed about the position on the £200,000 or £170,000 options.
- 4.28. The public responses to this post were extremely hostile to the prospect of a £200,000 cost, and this clearly prompted the allegations of corruption made against councillors.
- 4.29. As a general matter, where information is confidential, whether it is appropriate for a councillor to disclose that information is a question of balancing the public interest in disclosure against that of preserving confidentiality. It appears in the public interest for the Council to preserve confidentiality over commercial bids by contractors, as this facilitates the Council's ability to negotiate. Equally, it is in the public interest for residents to understand the cost of projects which are being pursued on their behalf, where those costs are substantial.
- 4.30. For completeness, I note the Guidance also states that disclosures of confidential information must be made in good faith, and not with any ulterior motive.
- 4.31. It would have been surprising had the bidder not intended the quote to be confidential. This is particularly the case in relation to the post directly inviting rival bids. It is also plainly contrary to the Financial Regulations for rival bidders to be granted the opportunity to bid against identified costings (containing breakdowns) from their rival – this supports the argument that this could have been a breach of the confidentiality obligation.
- 4.32. It is also clear from the Complaints that the disclosure of the £200,000 figure by Cllr Daden was not done with the prior agreement (or awareness) of the Parish Council as a whole.
- 4.33. However, I am unable to determine based on the available information whether (1) the £200,000 figure was in fact provided by the bidder to the Council on a confidential basis – Cllr Daden's recollection was that it was not marked confidential – or (2) whether it was made clear by the Clerk or others that discussions of costings should have been Part 2 business. The Financial

Regulations do not contain any express provisions around confidentiality in relation to procurement exercises.

- 4.34. As a result, and notwithstanding my finding that the invitation to rival bidders was a breach of the Financial Regulations, I am not able to make a positive finding as regards whether or not there was a breach of the confidentiality obligations in these instances.

Bringing the Parish Council into disrepute with the local community

- 4.35. Paragraph 2.5 of the Parish Council's Code of Conduct provides that Councillors

“must not conduct yourself in a manner which is likely to bring the Council into disrepute.”

- 4.36. Although not referenced in the Complaints, I note that the paragraph 2.2. of the Code states that Councillors must *“respect others”*. This is a related provision which appears to apply to the conduct complained of.

- 4.37. There are two sets of circumstances under consideration here:

- A. Apparently during or shortly after the 3 February meeting, Cllr Daden posted a link to the Jackie Weaver video, accompanied by the comment: *“to compare [with] Broomfield Parish Council”*. The post gathered numerous responses. In reply to one of these responses, Cllr Daden stated *“sadly the setting does attract many wrong types and the real heart of the community just pass through – so if I didn’t keep laughing, I would be broken now!”* (the **Jackie Weaver Comments**).

- B. The discussion in the meeting of potential project costs led to comments from members of the public which directly accused the Council of corruption, including:

- *“That’s public money!! When 140k is quoted and now jumps 60k not unreasonable to ask the why and wherefores,”*
- *“someone’s getting a nice backhander by the sounds of it!”*
- *“sorry this is wrong ... someone is getting something out of this.”*

Cllr Daden responded to public criticism of the level of project cost under discussion by commenting: *“Maybe [the Parish Council] have won the lottery”* (the **Bribery Comments**).

- 4.38. In my judgment, these two comments should be read in conjunction in terms of their effect.

Guidance and Caselaw

- 4.39. The current Guidance deals with the general obligation under the Code to treat other councillors with respect. Disrespectful behaviour encompasses “*any behaviour that a reasonable person would think would influence the willingness of fellow councillors, officers or members of the public to speak up or interact with you because they expect the encounter will be unpleasant or highly uncomfortable*”. Attempts to shame or humiliate others, or inappropriate sarcasm, are listed as examples of disrespect.

- 4.40. The Guidance states that conduct will bring their role or the local authority into disrepute if it:

“could reasonably be regarded as either ... adversely affecting the reputation of your authority’s councillors, in being able to fulfil their role [or] ... reducing public confidence in their local authority being able to fulfil its functions and duties”

- 4.41. I must also consider Cllr Daden’s rights to free expression (Article 10), and the wide degree of tolerance accorded to political speech in particular. The current Guidance states in relation to Article 10 that “*Political expression is a broad concept and is not limited to expressions of or criticism of political views but extends to all matters of public administration including comments about the performance of public duties by others.*”

- 4.42. The test for bringing the council into disrepute must be objectively applied: it cannot require an assessment of the subjective intention of the writer/speaker.

- 4.43. A recent court case has considered similar circumstances involving a parish councillor accused of bringing the council into disrepute.⁴ The Claimant in that case was a councillor who had been sanctioned for a breach of the Council’s code, due to remarks in which he made misrepresentations about the motivation and intentions of other councillors, and questioned the integrity of the Chairman and Clerk. The Court found that the Council had infringed the Claimant councillor’s Article 10 rights to free expression by sanctioning him:

“the fact that other councillors disagreed with, and were offended by, the Claimant’s assessment of their views and conduct, or that the Claimant’s assessment was found to be inaccurate, mistaken or even untruthful, was not a sufficient basis for interfering with his right to express his opinions.” [emphasis added]

⁴

[R\(Robinson\) -v- Buckinghamshire Council \[2021\] EWHC 2014 \(Admin\)](#)

The Jackie Weaver Comments

4.44. Cllr Daden has responded to the disrepute allegation as follows. I have set out beneath each response my conclusions.

A. The comments were posted to her private account, not a public account.

It appears from screenshots of her page that a number of members of the public who were following the meeting were following her commentary, such that her remarks appear to have been sufficiently public to bring the Council into disrepute.

B. The comments were posted in response to conduct by fellow Councillors which Cllr Daden (and other members of the public listening in) considered disrespectful of her.

This is grounds for a separate complaint against those councillors, but not a justification for remarks bringing the council into disrepute. It was open to Cllr Daden to challenge any alleged disrespectful conduct by other councillors in other ways than posting the Jackie Weaver video.

C. If the comments were disparaging to the Parish Council, this was because they must have been correct, and by contrast, if the Parish Council was well-run (i.e. not like Handforth) then it would not have been a disparaging comment.

This is not a justification for making remarks to the public that bring the Council into disrepute.

D. Responses to the post from the public were directed at Handforth, not Broomfield.

It is unclear to me whether the direct public replies I have seen related to Handforth alone or the Council. However, Cllr Daden's message specifically invites comparison with Broomfield, and I note that other replies to Cllr Daden were disparaging of other councillors. It is reasonable to suppose that the post would have conveyed a disparaging impression to the readers.

4.45. I consider that this remark brings the Council into disrepute.

Bribery Comments

4.46. As set out above, I am informed that the £200,000 option had been eliminated, and the £140,000 option was still under consideration (although as above, I have not seen evidence as to whether Cllr Daden had been informed of this). The basis for the public accusations was therefore to a degree the result of the misleading post by Cllr Daden.

- 4.47. Cllr Daden has stated that this comment was made humorously. She has also provided me with a copy of a further Facebook conversation in which she discusses with members of the public and Donna Hance the cost of an astro turf pitch. In this she states, at the end of a comment about a high cost “... *if I win the lottery, I will think of you ...*”.
- 4.48. However, the immediate context of the Bribery Comments was an angry public discussion. In my judgment, the objective import of the statement “*maybe Broomfield Parish Council have won the lottery*” in that context was dismissive and derogatory. Cllr Daden has said that she was not aware of all of the messages being sent, but I note that her specific post here was a response to another poster.
- 4.49. I consider that the conduct complained of here clearly brings the Council into disrepute. I note also that Cllr Daden has herself acknowledged to me that on subsequent reflection she considers that the conduct was unprofessional, albeit she did not think so at the time.

Disclosure of Interests

- 4.50. Paragraph 4.1 of the Parish Council’s Code of Conduct states:

“if you attend a meeting and there is an item of business to be considered in which you are aware you have a non-disclosable pecuniary interest or non-pecuniary interest, you must make a verbal declaration of the existence and nature of that interest at or before the consideration of the item of business or as soon as that interest becomes apparent”

- 4.51. Cllr Daden is the chair of the Broomfield Community Association (**BCA**). The website of the BCA⁵ states that it is advocating the provision of a new building on Broomfield Place, to include a GP surgery and “community facilities” which would include relocation of the local library, business co-working space and a café. The project description proposes the use of £200,000 of CIL money. Accordingly, albeit that the proposals on the BCA website do not specifically include youth provision, the scope of this project (in particular the library and café) appears to overlap and to be in potential competition with the Youth Centre proposal. Cllr Daden has noted to me that only in the February 2021 meeting did she suggest a purpose-built facility at Bridges as an alternative.
- 4.52. The BCA is not a registered charity or company. The website states that it was formed “at the request of Broomfield Parish Council”. The Council’s minutes record that a working group had been formed in June/July 2020 to produce a prospectus for a similar proposal to Essex County Council.
- 4.53. The complainants allege that Cllr Daden should have registered her interest in BCA. The complaint does not include an express allegation that Cllr Daden’s

⁵ <http://www.broomfieldbridges.org/>

involvement in BCA creates an active conflict of interest, although this may be implicit. I am also aware since the complaint that Cllr Daden's involvement in BCA was not registered with Chelmsford City Council, and that this is being updated.

- 4.54. There is a clear question on the facts presented as to whether Cllr Daden should have recused herself from discussions as regards the Youth Centre project: there is a risk that she could be perceived to be biased (i.e. apparent bias) against the Youth Centre in favour of the Bridges project. Apparent bias arises where a fair-minded and informed observer, having considered the facts, would conclude there was a real possibility of bias.
- 4.55. Cllr Daden has told me that she did not consider her BCA position was in conflict at this time, because both the Bridges project and the Youth Centre project were in her view still at a formative stage and therefore were not competing, and also because the BCA did not include specific youth centre provision – she has said that the vision presented by BCA was that the Youth Centre and the Bridges facility would be distinct – the former would be “noisy” areas (sport, play etc) while the latter would be for quiet activities (library, business/study). While this distinction may be important, for the reasons at paragraph 4.51 above it does still appear to me that a fair-minded and informed observer would still consider that the library facility and café could compete as a venue. I also note that the purpose of the disclosure provisions, and the apparent bias test, involve a precautionary approach.
- 4.56. I note that in its November 2020 meeting the Council noted the creation of “independent Bridges Broomfield Community Consortium”. Cllr Daden's interest in the BCA was known to the Council as at its meeting on 20 January 2021: at this meeting she presented an application for grant funding on behalf of the BCA. I also note that in July 2020 the Council received a presentation from Cllr Daden as lead for the Bridges Working Group.
- 4.57. Notwithstanding that her involvement in the BCA was known to the Council in 2020, in light of the above, I consider Cllr Daden was in breach by not making an express declaration of her interest in BCA at subsequent meetings.

Alleged Misreporting to the Parish Council of third-party discussions

- 4.58. Paragraph 2.9 of the Parish Council's Code of Conduct requires Councillors to:
- “In your decisions and actions apply the principles of ... integrity, objectivity, accountability, openness, honesty”*
- 4.59. The “enhanced protection” of political expression under the Article 10 of the ECHR is broad. It “*extends to all matters of public administration and public concern including comments about the adequacy or inadequacy of*

performance of public duties by others".⁶ Equally, it does not apply to statements which a publisher knows to be false.

4.60. In a Parish Council Planning Committee Meeting on 9 February 2021 relating to the preparation of the Broomfield Neighbourhood Plan (the "**NP**"), Cllr Daden is alleged to have misleadingly claimed that the Clinical Commissioning Group ("**CCG**"), who are responsible for primary care, supported her ambition to build a GP Surgery at Broomfield Place.

4.61. In particular, the allegations are that:

- A. Cllr Daden claimed in the Planning Committee meeting to have attended a meeting with the CCG in the week beginning 1 February 2021, together with City Cllr Steele, at which the CCG expressed enthusiasm for the creation of a medical facility at Broomfield Place;
- B. On 11 February 2021, Cllr Daden supplied a copy of her question in writing as follows:

"Cllr Steel and myself met with CCG last week; they were keen not to miss the opportunity to purpose Broomfield Place land with health provision and will be making contact with ECC shortly. They have obviously been tied up with Covid but would not want to miss the opportunity. A GP Surgery is an aspiration of the public; will this aspiration be written into the Neighbourhood Plan so that the surgery can be delivered at Broomfield Place in the future?".
- C. Cllr Daden misled the Council as to the health bodies who were represented at her meeting;
- D. Cllr Daden separately misrepresented the outcome of that meeting;
- E. Cllr Daden intended, via the alleged misrepresentations, to secure specific mention of her proposal for the Broomfield Place Land in the NP: Cllr Daden's question to Planning Committee was "... will this [aspiration for GP facilities] be written into the Neighbourhood Plan so that the surgery can be delivered at Broomfield Place in the future?".
- F. Had the alleged misrepresentation been accepted by the Council, the Group Complainants say that it could have resulted in the inclusion in the NP of a site proposal which was unfeasible, which would in turn have weakened the NP generally. It could also or alternatively have resulted in "a further round of fruitless discussion with ECC property officers and CCG managers", which would have wasted Councillors' time and possibly affected the relationship with ECC and the CCG.

⁶ Heesom v Public Services Ombudsman for Wales [2014] EWHC 1504 (Admin)

Background

- 4.62. The Group Complainants make the following observations on the background and the surrounding events:
- A. The Parish Council has pursued the possibility of having a GP surgery in Broomfield since at least 2019. I understand there has been no interest at Parish Council level, or expressed in public consultation for the NP or elsewhere, in the provision of ophthalmology or other health services.
 - B. In summer/autumn 2020, the Parish Council discussed with Essex County Council the prospect of a GP surgery on its land south of Broomfield Place. ECC stated that the CCG had not requested land for a surgery, and presented a different vision for the use of its land. Consequently, the Parish Council wound up its working group.
 - C. In December 2020 the Council met with the CCG to discuss the possibility of a surgery being created on the Village Hall site. The CCG expressed interest, but there was no conclusive outcome.
 - D. Subsequent to the Planning Committee meeting, the Committee Chair (Cllr Blake) asked Cllr Steele to confirm that a meeting with the CCG had taken place as claimed. He confirmed that it had not – the meeting had in fact been with representatives of the ophthalmology department of the Hospital Trust, who have no responsibility for GP services.
 - E. Cllr Blake then wrote to Cllrs Daden and Steele asking for their confirmation. They both replied that they had not met with the CCG.
- 4.63. Cllr Daden confirms that she and the complainants share the aspiration for a GP surgery in Broomfield.

The Allegations

- 4.64. Cllr Daden has responded as follows to the complaints:
- A. Since the end of 2019, she has had several meetings with the CCG (Ms Kerry Harding, director for Mid Essex trust), following the public response to the Broomfield Parish Council May 2019 consultation. Ms Harding did not commit either way at those meetings. I have not seen records of those meetings.
 - B. As part of her role as a city councillor, at an unknown date she attended a meeting with Broomfield Hospital “on the back of” a presentation from Ciara Moore (understood to be an NHS Manager) who presented ophthalmology plans, to develop follow-up in the community and eye units separate from the hospital site.
 - C. Cllr Daden then invited Mr Dan Doherty from the CCG to join a meeting (Ms Harding having moved to a different role). Mr Doherty had met with

Broomfield Parish Council to discuss a GP surgery in Broomfield and to consider the village hall as a potential site. Cllr Daden wanted the meeting to “connect the dots” and bring stakeholders together regarding potential GP and ophthalmology facilities in Broomfield.

- D. In the event Mr Doherty did not attend, and the meeting went ahead on 3 February with Cllr Daden and others including the Trust’s Chief Commercial Officer (Mr Jonathan Dunk) and City Cllr Steel. It is understood that Mr Dunk was a representative of the ophthalmology department of the Hospital Trust. Mr Dunk said that as Broomfield Place is approximately one mile from the hospital, it would be convenient for doctors to visit both venues and was of interest to them. He added that the CCG/Trust was always interested in exploring possibilities, and that he would take the idea forward.
 - E. Cllr Daden had assumed (based on conversations with Trust and CCG directors) that they were operating so closely the duties overlapped – it appeared to her in February 2021 the CCG was co-ordinating both hospital responsibilities and GP requirements. She also believes Mr Dunk stated, or implied, that he knew and worked with Mr Doherty of the CCG.
 - F. Mr Dunk stated that his organisation “would not want to miss an opportunity” after it had been agreed in the meeting with Cllr Daden that the ophthalmic facility was too large to go forward. Accordingly, Mr Dunk “can only be referring to the GP Surgery”.
 - G. As regards the 9 February 2021 Parish Council Planning Committee meeting:
 - i. Cllr Daden attended this meeting voluntarily, to inform the parish council of the possible cooperation of the CCG/Trust regarding medical facilities in the context of the scope of the NP.
 - ii. What she presented was a request for the NP to include the possibility that the GP surgery could be delivered at Broomfield Place.
 - iii. She believes she subsequently apologised for any misunderstanding on her part as to who attended the February 3rd meeting.
- 4.65. Accordingly, Cllr Daden has stated that the matters in the allegation result from a mistake over the identity of the NHS representatives and their authority to speak about the GP Surgery project.
- 4.66. The Group Complainants have commented as follows on Cllr Daden’s responses above:
- A. Minutes of a meeting dated 5 August 2020 between Cllr Daden and Kerry Harding (Mid & South Essex CCGs) and Dr Ann Holmes demonstrate that Cllr Daden was aware that the CCG was the relevant entity for the purposes of progressing the GP surgery proposal. Cllr Daden was also provided with minutes of a meeting dated 10 December 2020 between the Parish Council’s NP group and Dan Doherty, who is described as “Alliance

Director, Mid Essex CCG". Accordingly, she was aware of Mr Doherty's CCG role.

- B. Given that Cllr Daden had meetings with Mid and South Essex Hospitals Trust in her role as City Councillor (see paragraph 4.64(B) above), *"she was therefore well-placed to know the different roles and responsibilities of the different NHS agencies"*.⁷
 - C. It is consequently not credible that Cllr Daden was not aware of the responsibilities of the NHS staff at the 3 February meeting, or that she believed *"the Hospital Ophthalmology Department could act on the CCG's behalf to commission or support a GP surgery at a specific location"*.
 - D. Cllr Daden should have been clear to the Planning Committee that the topic of discussion in the meeting was ophthalmology services at Broomfield Place, instead of referring to "health provision" (which was initially understood to mean GP services – see 12 February email from John Blake to Cllr Daden and others).
- 4.67. I note Cllr Daden's 13 February email, in response to Cllr Blake's questioning over both CCG presence at the meeting and GP/ophthalmology interest, indicates that the discussion ultimately concerned only ophthalmology (*"The meeting was productive for us to understand more about ophthalmology"*). Cllr Daden went on to say that *"[Cllr Steel] and myself were in agreement on this occasion the meeting was not something of interest to Broomfield... That said, the chief commercial officer is now aware of residents' desire to have a GP surgery at Broomfield Place ..."*
- 4.68. I also note that Cllr Steel's email of 13 February, immediately following Cllr Daden's reply to Cllr Blake, is clear that there were no CCG attendees.
- 4.69. Cllr Daden's 13 February email to the Council adds that *"It was Jenny Robinsons (CCC Neighbourhood planning officer) that recommended we refer to GP surgery as health provision in the NP, in the event CCG required something to compliment the surgery planning permission would be achievable."*
- 4.70. Cllr Daden has supplied a copy of an email dated 15 February 2021 from Kerry Harding (NHS Mid Essex CCG) to her and others which states:

"As you are aware our initial thoughts are that [Broomfield Place] may not be suitable due to size and location for a health and care facility to accommodate primary, community and out of hospital services. However

⁷ The Group complaint also assumed that the meeting with the Hospitals Trust would have taken place at the Broomfield Hospital, not at the CCG headquarters (i.e. making it more obvious who spoke for what organisations), but Cllr Daden has said that these were online meetings. The Group complaint further relies on the fact that different attendees would have had different email addresses which should have made clear their roles. Cllr Daden has said that the meetings were in fact coordinated by a single point of contact, but in any event I do not think this point can be strongly relied on.

we will not completely discount any site until there is a basis and agreement as a health and care system to do so.”

4.71. For completeness, I understand there is a disagreement between the complainant and Cllr Daden over whether Essex County Council (the landowner of Broomfield Place) is opposed to a GP surgery, or whether their position is subject to prior agreement by the Trust. Cllr Daden has stated that until the land at Broomfield Place has been purposed, there is a possibility that a GP /medical centre could be delivered there.

4.72. My observations on these allegations are as follows:

- A. It appears there would have been a clear awareness on the part of all councillors that GP services were of real interest to the community, while there was no material interest in the provision of ophthalmology or other medical services.
- B. The email of 15 February quoted at paragraph 4.70 above appears to be a reliable statement of the position as at the dates in issue, being from the CCG directly and indicating that it confirms previous discussions with Cllr Daden. That position was that the CCG was not committed to, or currently enthusiastic to pursue, the Broomfield Place site. This was for structural reasons – size and location – rather than other circumstantial factors. Although Ms Harding stated that the site was not categorically ruled out, it seems to me that only tentative reliance at best could be placed on that statement for the purposes of the Parish Council’s planning.
- C. While I clearly cannot comment on the exact contents of the discussions in the 3 February meeting, it seems generally unlikely that representatives of one NHS body would give any assurances to third parties, other than in the vaguest of terms, regarding the plans or intentions of other NHS bodies.
- D. Leaving aside the incorrect reference to the CCG instead of the NHS, if Cllr Daden’s question on 11 February had referred to “ophthalmology” instead of “health provision” when describing the alleged enthusiasm of the CCG, it does not appear that this would have influenced the Planning Committee in its drafting of the NP to refer to Broomfield Place as a GP surgery location;
- E. The tenor of the question submitted to Planning Committee seems to be at odds with the description of the meeting by Cllr Daden in the emails on 13 February: for example, Cllr Daden states that *“I still believe Broomfield will have to offer more than a simple surgery to gain CCG support for a surgery”*. However, Cllr Daden has subsequently explained to me that *“it was agreed during the meeting the ophthalmic facility was too large to go forward”*. So it appears that Broomfield was not a suitable location for an

ophthalmology “spoke” either. This also appears to be an inconsistency with the tenor of the explanation given in paragraphs 4.64(D) and (F).

- F. While I am unable to draw certain conclusions about which organisation (CCG or otherwise) Cllr Daden thought the meeting attendees were representing, I note that Cllr Steel (following on from Cllr Daden’s reply to Cllr Blake’s question) was clear that “the attendees were not CCG”, and also clear on the intention of the attendees, i.e. to explore whether an ophthalmology site might be located next to a GP surgery in Broomfield.

4.73. In conclusion therefore:

- A. it appears to me unlikely that the meeting gave any reason for increased optimism that the CCG would agree to a GP surgery at Broomfield Place.
- B. It also appears to me that the intention of Cllr Daden’s question was clearly to enhance the position of Broomfield Place, albeit in the context of the Council’s broader aspiration to ensure GP surgery provision.
- C. It appears clear from the nature of the complaint that the Planning Committee was not otherwise intending to promote Broomfield Place as a GP surgery location in the NP.

4.74. Accordingly, Cllr Daden’s question to the Planning Committee meeting appears objectively misleading to me, and does not in my view comply with the openness requirement of the Code.

Annexes

- **Annex 1 – Relevant Minutes**
- **Annex 2 – Other Documents**
- **Annex 3 – Other Documents (Confidential so in part 2 of the agenda)**
- **Annex 4 – Screenshots (Confidential so in part 2 of the agenda)**

REPORT TO CHELMSFORD CITY COUNCIL
REGARDING COMPLAINTS AGAINST A BROOMFIELD PARISH COUNCILLOR

ANNEX 1 - EXTRACTS FROM BROOMFIELD PARISH COUNCIL MINUTES
PRIOR TO 3 FEBRUARY 2021

Meeting Date		Cllr Daden in attendance
18 December 2019	<p>To consider a proposal for refurbishing the Angel Field play area using CIL money.</p> <p>... The existing play equipment and surface is tired, and it was recognised that the new equipment would be a better use of money than running repairs. It was agreed that the idea has merit, there is more work to be done on the proposal before it can be agreed. Cllr Daden proposed that it would be helpful if the children were invited to visit other play areas and form an opinion about what is available. ...</p>	Yes
18 March 2020	<p>Update on the proposal for refurbishing the Angel Field play area using CIL money.</p>	No
17 June 2020	<p>To consider a proposal to allocate CIL funds for refurbishing the Angel Field play area.</p> <p>The Parish Council's draft strategic plan is under development and the supporting paper outlines some ideas that can be investigated and moved forward. For the play area project, the Council is asked to allocate a fund to give tenderers an indication of the scope of works intended. It is known that the safe play surface is very poor and could cost up to £20k to renew. The City Council could be asked to project manage the work.</p> <p>...</p> <p>Motion. The Council will allocate £40,000 to a fund for improvement to the Children's Play Facilities at Angel Field Play area with a decision on the final specification following competitive tender and consultation.</p> <p>Resolved. The Council will increase the sum allocated for the work from £40k as given in the motion to £50K. Proposed Cllr Thomson seconded Cllr Steed and carried unanimously.</p> <p>Resolved. The Council will allocate £50,000 to a fund for improvement to the Children's Play Facilities at Angel Field Play area with a decision on the final specification following competitive tender and consultation. Proposed Cllr Thomson seconded Cllr Steed and carried unanimously.</p>	Yes

Meeting Date		Cllr Daden in attendance
15 July 2020	<p><u>To consider an application for a youth club</u></p> <p>To note a request to establish facilities and investigate funding opportunities to establish a youth facility in the Parish.</p> <p>Donna Hance and Shirley Hume are keen to establish a Youth Club for the Parish, but have not found a suitable venue. Other sites have been considered, but were not attractive as they could not be customised to meet the needs and expectations of the youth. The prospect of a dedicated building is very attractive.</p> <p>They noticed the Parish Council were looking for partners and projects suitable for Infrastructure investment and wish to work together to provide a venue. The proposal is for a building that the youth club could use, but would also be a multipurpose facility to teach new skills, and provide a venue that can be hired for events that would not be suitable for the Village Hall itself.</p> <p>Cllrs Hubble and Faulds support the idea provided there is somewhere to locate it. Cllr Mercer noted that there have been youth clubs in the past, but if something new can be established it would be supported. Cllr McKie suggested that the building is designed to be disability friendly.</p> <p>County Councillor Aldridge would refer the proposal to youth services who are interested in the project. They are supportive and would like to see it happen, they have no money but would be keen to get involved in any other way. There is a possibility of lottery funding for equipment and running costs but there would be no external capital funding available.</p> <p>An initial estimate shows that the project could be done within existing funding and built on land already owned by the David Smith Charity. The project could be used as a pilot for future extension of the hall.</p> <p><u>The Clerk will establish a working group who will make a more detailed proposal for later consideration.</u></p> <p>Broomfield Place</p> <p>Cllr Daden made a presentation to illustrate the benefits of a tranquil place in the Parish that can complement the vibrancy of other facilities that are available. The facility proposes a library which is needed to support children in their studies, workers who wish to remote work, and to provide a space for quiet study. The new library will be more accessible than the current site.</p> <p>The Council notes the prospectus and commends it to Essex County Council and Chelmsford City Council in for implementation. Proposed by Cllr Blake seconded Cllr Mercer and carried unanimously.</p>	Yes

Meeting Date		Cllr Daden in attendance
19 August 2020	<p>Motion. The Council will allocate £5,000 for feasibility, professional and legal advice on the provision of a Youth Facility. Concern was expressed that the Council was being asked to vote money without a detailed proposal for how the money was to be spent. The Chairman reported that the working group has produced a rough outline of their needs, and the money is a draft budget which may be drawn down if needed for professional assistance.</p> <p>Amendment. Any spending in excess of £500 will be referred to full council. Proposed Cllr McGuinness seconded Cllr McKie. With three in favour, the amendment failed.</p> <p>Amendment. The sum allocated will be reduced to £1,000. With six in favour and one abstention the motion was amended.</p> <p>Resolved. The Council will allocate £1,000 for feasibility, professional and legal advice on the provision of a Youth Facility. Proposed Cllr Blake seconded Cllr Barnes and carried with a majority of seven.</p> <p>[Pavilion Dispute item] "Cllr Daden considers that the council should use everything within their remit to make the café a success"</p>	Yes
30 September 2020	<p>To note progress on Youth Club facilities.</p> <p>Initial research on the project indicate that the cost will be in the region of £100,000 which is within the capacity of the CIL funds held by the council.</p> <p>The favoured location for the building is behind the MUGA and the next step is to define the requirements for attaching the utilities. As the building will be such a prominent part of the view, consideration must be given to the aesthetics and the council should consider spending more to get an attractive end product.</p> <p>There was agreement that the work was progressing well, and met the aspirations of the Council. Work will continue toward this</p>	Yes
21 October 2020	<p>Indicative prices have been received from a potential supplier of a six-bay building.</p> <p>Opinions are being sought from Chelmer Valley High, Essex County Council and Chelmsford City Council on the need for, and benefits of a youth club. So far, the responses have been positive.</p> <p>Cllr Thomson suggested contacting Essex Youth Build who train children to do construction work through apprenticeship. There may be an option to self-build. ...</p>	Yes

Meeting Date		Cllr Daden in attendance
18 November 2020	<p>Councillors expressed some concern about siting the building behind the MUGA, asking if other sites been considered. The proposed location would spoil the view, so thought should be given to placing it lengthwise on the north end of the field. It was confirmed that the location had not been finalised, so potential bidders could be asked for their guidance in choosing the best position. An offer has been received for architectural assistance from a resident. ... A resident expressed concern about the erection of another building on the DS site. Although the establishment of a Youth Centre was an important and useful project, the David Smith field should be preserved as an open space. ... The Council thanked Cllr Hance for the impressive work done on preparing the specification</p> <p>Resolved. The council approves for submission to Contract Finder, a draft specification for a 6-bay demountable installed and fully connected with a full turnkey solution. Proposed Cllr Barnes seconded Cllr Faulds and <u>carried unanimously</u>.</p>	Yes
December 2020	<p>The proposal was placed on contract finder and six companies expressed their interest. Only one had a specific proposal which met the requirements of specification. Following a review meeting, <u>it was agreed that Wernick would be invited to produce a firm proposal for installation on the David Smith field.</u></p>	Yes

REPORT TO CHELMSFORD CITY COUNCIL

REGARDING COMPLAINTS AGAINST A BROOMFIELD PARISH COUNCILLOR

ANNEX 2 – OTHER RELEVANT DOCUMENTS

1.	Broomfield Times, Autumn 2020
2.	Broomfield Youth Group survey results – January 2021

Parish Council

Broomfield Youth Club

Firstly, I would like to introduce us Shirley Hume (Founder of Springfield and Broomfield Youth Group) and myself Donna Hance the Chairperson at Broomfield Youth group.

Shirley and myself both have very clear views and aims for the young people of our parishes, we feel there is a very clear gap in society where our Young people are not considered and we alongside our youth groups provide a unique experience for our young people where they are valued as a member of the community.

So, you might ask why we need a youth provision in Broomfield... As of recent months, we in our local areas have seen an increase in vandalism and anti-social behaviour caused by boredom.

Our Youth provision can offer an alternative solution to young people sitting around in parks or outside shops, our aim is to provide a safe and secure environment where young people can relax and enjoy the company of others whilst having access to an alternative education.

Our young people will be at the heart of everything it provides, we will provide the young people an opportunity to learn new skills such as First Aid, Self Defence, and gain confidence and improve their self-esteem, whilst being in total control of their own ideas. Being part of a youth group enables young people to take ownership of their provision, it teaches them to respect their community and those who live in it, it helps with the risk of being involved in anti-social behaviour, Gangs, drugs and Alcohol.

Springfield Youth Group has been successfully running now for 4 years with over 600 members on file, we want to provide this facility in Broomfield, We have proposed to the Parish Council that a purpose built multi use Young Person's Centre is built on land near to Broomfield Village Hall, this will be home to multiple youth evenings, an evening solely for additional needs and their parents, a weekend youth café, day to day the facility will be open to other local community groups.

We would like to ask the people of Broomfield if any of you would like to support our project through development or sponsorship, maybe you have a skill that could be used in the building of the project or would like to volunteer your time once the project is up and running if so please contact the Parish Council who will put you in touch with us. (email clerk@broomfieldessex.co.uk).

Councillor Donna Hance
Mobile: 07729 239613



Broomfield Youth Group

Christmas Hamper making



Remembrance Day



Tea Dance



Playing basketball with Essex Police



12 Broomfield **TIMES**

www.broomfieldessex.co.uk

Broomfield Youth Group

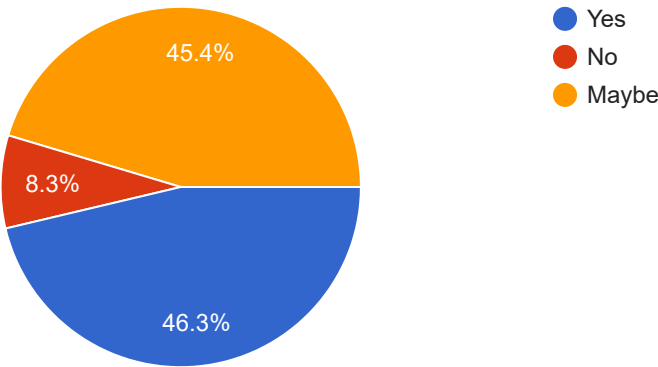
109 responses

[Publish analytics](#)

If a new Youth Centre opened in Broomfield, would you use it?

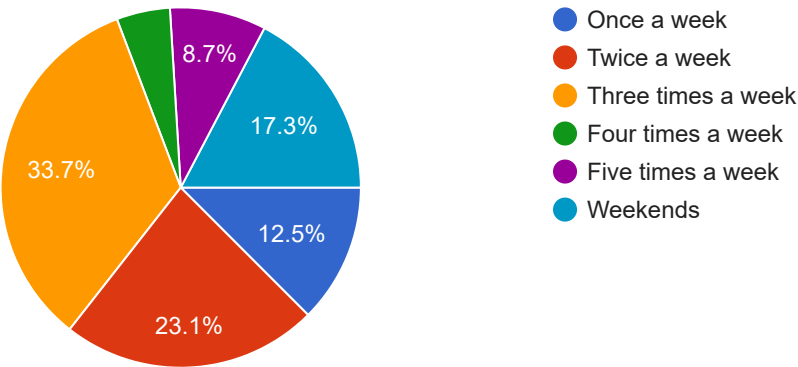


108 responses



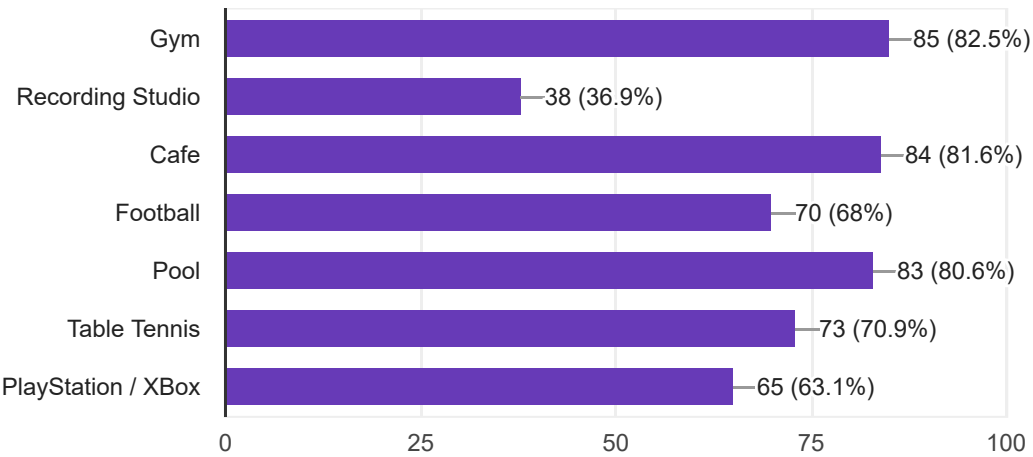
How often would you like to see it open?

104 responses



What facilities would you use?

103 responses



What other things would you like to use?

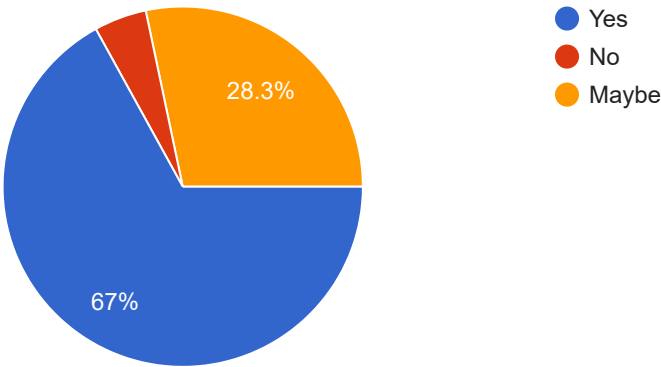
32 responses

- TV
- outdoor running space for free running
- Basketball hoops
- Basketball court
- Dance
- Counselling/ support
- Computers
- Basketball. Tennis.
- Basketball team



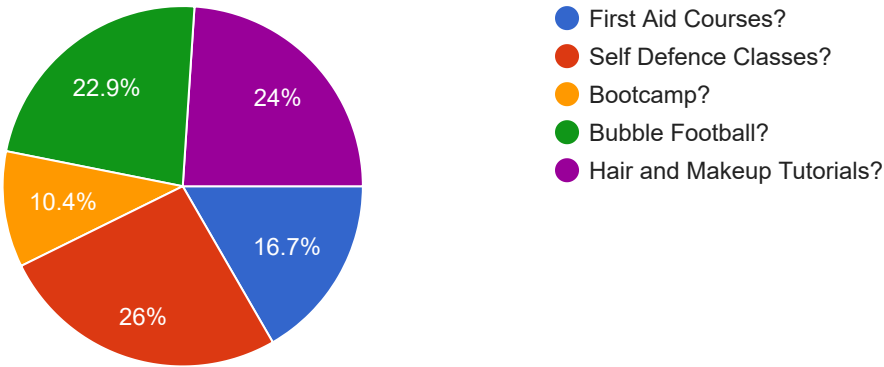
Would you use a Youth Cafe after school and weekends?

106 responses



Would you take part in...

96 responses



Do you have any other ideas for the Youth Centre?

27 responses

I don't want adult supervision out of school

Organised trips

as long as behaviour was in check and no bullying I would allow my boys to attend. one of my sons is special needs and I would like to encourage social interaction while being in a safe environment.

Thank you

I am answering on behalf of my daughter aged 13years. I think this would be a fantastic idea to keep her safe and enable her to socialise and have fun with a peer group. You could maybe have people in the community come and talk about things happening in community . Also maybe organise days out together doing an activity , also get the kids to do fundraising (making cakes ect to sell) for the youth club so they look after it more. Maybe have mentors so children who are a bit shy have someone to go when they join the show them around, so club isnt clicky and children mix.

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