

Nursing and Midwifery Council

Council Code of Conduct

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| Title | Council Code of Conduct |
| Summary | This Code sets the ethical standards for Council members and Associates. |
| Approved | Approved by the Council 24 November 2021. |
| Policy Owner | Secretary to the Council. |
| Next review date | <p>Dependent on legislative change but possibly April /October 2023.</p> <p>All governance policies will be reviewed in preparation for transition to a Unitary Board governing model. Any new NMC Governing body will need to adopt a Code and related policies as an early item of business.</p> |
| Comments / Suggestions | If you have any comments / suggestions in relation to this Code please contact the Secretary to the Council. |

Other related policies and guidance mentioned in this policy you may find helpful to look at:

| Title | Board Intelligence (BI) Shelf |
|---|--|
| Standing Orders | Document Library: Governance and Constitutional |
| Council Managing Interests Policy | Document Library: Council Policies and Guidance |
| Council Gifts and Hospitality Policy | Document Library: Council Policies and Guidance |
| Partner members Code of Conduct | Document Library: Partner member Policies and Guidance |
| Anti-fraud and anti-bribery Policy | Document Library: Council Policies and Guidance |

Introduction

- 1 The NMC is the professional regulator for nurses and midwives in the UK and nursing associates in England, established and governed by the Nursing and Midwifery Order 2001 (as amended) (the Order). The NMC is also a registered charity and seeks to ensure that all our work delivers public benefit.
- 2 The overarching aim of the Council is the protection of the public by:
 - protecting, promoting and maintaining the health, safety and wellbeing of the public;
 - promoting and maintaining public confidence in the professions regulated under the Order; and
 - promoting and maintaining proper professional standards and conduct for members of those professions.
- 3 In carrying out your Council role, you are expected to demonstrate integrity and high ethical standards as set out in this Code of Conduct. You are also expected to comply with the underpinning policies, including:
 - Council Managing Interests Policy; and
 - Council Gifts and Hospitality Policy.
- 4 This Code applies to both Council members and Associates.
- 5 **For Associates:** there are some aspects of the Code which do not apply, given that Associates do not vote on Council decisions (although votes are rare), are not Charity Trustees or subject to the legal duties, responsibilities or liabilities which apply to appointed Council members. However, as you will be involved in all aspects of the Council's work and will contribute in the same way as appointed members, it is important that you are familiar with and understand all aspects of this Code.

Individual responsibilities

Principles of Public Life

- 6 You should uphold the Seven Principles of Public Life (the 'Nolan principles'), in everything you do on Council. These are:
 - 6.1 **Selflessness:** Holders of public office should act solely in terms of the public interest.

- 6.2 **Integrity:** Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- 6.3 **Objectivity:** Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- 6.4 **Accountability:** Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this. As a Council member you are accountable to the public for the exercise of the NMC's functions and the use of its funds.
- 6.5 **Openness:** Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- 6.6 **Honesty:** Holders of public office should be truthful.
- 6.7 **Leadership:** Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Conduct and Values

- 7 You should conduct yourself at all times in a way which promotes trust and confidence in the NMC and professional regulation.
- 8 You should conduct yourself at all times in a way which supports our values:
 - 8.1 **Fair:** You should be honest and open, acting with integrity and respect for each other to create a fair, trusting and transparent workplace for all.
 - 8.2 **Kind:** You should promote kindness through listening to and considering colleagues' points of view. Act kindly and considerately towards everyone in a way that values people's insights and provide constructive challenge in order to improve our ways of working.
 - 8.3 **Ambitious:** You should be open to new ways of working and always aim to do the best for the professionals on our register, the public we serve and each other. Always aim to do better by being open to learning and feedback, and seeking to improve yourself and how you work.

- 8.4 **Collaborative:** You should work constructively with colleagues to a common purpose, sharing information and listening to others. Foster trust and demonstrate confidence in colleagues. You should offer ideas and be open to ideas proposed by others, working together to find creative solutions to problems. You address matters succinctly and without undue repetition so that others have sufficient opportunity to contribute. You value relationships both inside and outside of the NMC.
- 9 There is a [professional duty of candour](#) for the professions we regulate and the same ethos of being honest when things go wrong is expected of you in your Council role.

Equality, diversity and inclusion

- 10 You are expected to understand equality diversity and inclusion issues, complying fully with the NMC's responsibilities under anti-discrimination legislation and ensuring the NMC's equality, diversity and inclusion objectives are upheld.
- 11 You have a crucial role in providing leadership at the NMC on equality, diversity and inclusion, including race equality, ensuring that it is embedded in and informs everything the NMC does. All decisions should be rooted in fairness ensuring that the NMC is inclusive and values diversity as a regulator and an employer. It is important that you challenge any behaviour that is counter to this agenda.
- 12 You are also expected to provide assurance that the NMC is compliant with equalities and human rights legislation. This includes the NMC's obligation to exercise its functions in a way which has due regard to the public sector general equality duty (under the [Equality Act 2010](#)). This means having due regard to the need to:
- 12.1 eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - 12.2 advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - 12.3 foster good relations between people who share a protected characteristic and those who do not.

Note: The protected characteristics are: sex, age, race, disability, religion or belief, sexual orientation, gender reassignment, pregnancy/maternity and marriage/civil-partnership.

Conflicts of interest including gifts and hospitality

- 13 In carrying out your Council responsibilities, you are expected to:
- 13.1 avoid being influenced by, or place yourself under an obligation, to any individual or organisation which might affect, or be perceived to affect, your ability to act impartially and objectively on the Council.

- 13.2 declare any professional or personal interests which may conflict with, or be perceived to conflict with, your responsibilities on the Council. This may include registering or declaring the interests of family members or close associates.
 - 13.3 maintain your entry in the Council register of interests.
 - 13.4 decline any gifts, hospitality or benefits, offered in relation to NMC business, which could or might appear to influence you or compromise your personal judgement or integrity. Gifts or hospitality above £20 which are offered as a consequence of NMC business must be formally registered on the NMC's Gifts and Hospitality register.
- 14 Further guidance on conflicts of interests and gifts and hospitality can be found in the Council Managing Interests policy and in the Council Gifts and Hospitality Policy.

Role as charity trustees

- 15 As a Council member, you are also a Trustee of the charity. You have responsibility for ensuring that the NMC complies with its charitable objectives; delivers public benefit; and complies with charity legislation and guidance, in line with the requirements of the Charity Commission and the Office of the Scottish Charity Regulator.
- 16 You should ensure you have a clear understanding of your responsibilities as a trustee of the charity (under the [Charities Act 2011](#) and the [Charities and Trustee Investment \(Scotland\) Act 2005](#)).
- 17 Associate members: although you are not a Trustee of the charity, you should seek to develop your understanding of the responsibilities this places on the Council.

Collective responsibilities

- 18 You should ensure you have a clear understanding of the objectives, functions, powers and duties of the NMC as set out in the Order and associated legislation.
- 19 As a member of a statutory body employing staff, you share corporate responsibility for ensuring that the NMC complies with relevant employment, equality, human rights, health and safety, data protection, and freedom of information legislation.
- 20 You share corporate responsibility for ensuring that the NMC complies with any statutory or administrative requirements governing the use of its funds.
- 21 You have a responsibility to:
 - 21.1 ensure that you have a clear understanding of the scope of authority delegated to the Chief Executive and Registrar; and

- 21.2 hold the Chief Executive and Registrar to account for the exercise of delegated authority.

Decision-making

- 22 You have a responsibility to make sure decisions are taken in the best interests of the NMC's objectives, having regard to the Order and associated legislation, and the public interest, putting this before any personal or professional interests. Decisions should:
 - 22.1 be in the best interest of what the NMC is seeking to achieve, the public we protect, and the professionals we regulate;
 - 22.2 be consistent with the NMC's UK-wide remit; and
 - 22.3 take into account the needs and views of interested parties.
- 23 You have a duty to accept collective responsibility for enabling the Council to achieve its objectives and for decisions taken by the Council. You are expected to contribute to discussion and debate to enable robust decision making. Once the Council has taken a decision, you should support its communication and implementation.
- 24 You have a responsibility to be as open as possible with interested parties about the Council's decisions and the work of the NMC, restricting information only when the principles of confidentiality or the law require it.
- 25 If you are an Associate, you will not vote on Council decisions; however, votes are rare, as the Council aims to make decisions by consensus wherever possible.

Confidentiality and information security

- 26 You have a responsibility not to disclose confidential information obtained in the course of your role on the Council, unless it is in the public interest to do so, and in the event of any such disclosure you must notify the Secretary to the Council.
- 27 You should ensure that all confidential information, whether in electronic or paper form, is held and disposed of securely. Any loss or accidental disclosure, and the circumstances leading to the loss or disclosure, must immediately be notified to the Chair or the Secretary to the Council.

Communicating in public or online

- 28 You have a responsibility to distinguish clearly, when speaking or writing in any public forum, between the views of the NMC, your personal views, and the views of any other organisation to which you may be affiliated. Any public engagement or communication with the media on behalf of the NMC must be discussed with the Chief Executive and Registrar in advance. The same principles for discussing NMC business in public apply on social media.
- 29 You should always make sure you use all forms of spoken, written and digital communication (including social media and networking sites) responsibly.

- 30 If you are unsure whether something you post online could compromise your professionalism and/or trust and confidence in the NMC, you should consider how the information affects your responsibilities as a Council member and how the information may reflect on the NMC.
- 31 When using social media, remember that anything you say online can be copied or forwarded and taken out of context. Once something has been posted, it can be very difficult to remove it – even if you delete a post, it may already have been copied or shared.

Attendance, induction, development and appraisal

- 32 You should make yourself available for meetings of the Council and any committees or working groups to which you have been appointed or asked to attend by the Chair.
- 33 Ideally you should seek to attend all Council meetings and seminars and as a minimum you are expected to attend at least 75 percent of such meetings (Standing Order 5.6.2).
- 34 You should participate in induction, development, and appraisal processes and commit to your personal development.
- 35 If you are unable to participate in the meetings that you are expected to attend please send your apologies to the Secretary of the Council.
- 36 In exceptional circumstances, the Chair of the Council may grant a leave of absence to a member for a defined period (Standing Order 5.6.3). This may be with or without remuneration, depending on the circumstances.
- 37 Please highlight in advance any specific requirements (including requirements related to different religions or beliefs) or the need for reasonable adjustments to enable you to access papers or to participate in meetings. The Chair and the Secretary to the Council will try to accommodate your request.

Eligibility to continue to serve on the Council

- 38 You have a responsibility to ensure that at all times you remain eligible to serve on the Council. You should seek advice immediately from the Chair and/or the Secretary to the Council if you have any doubts or become aware that you may not be eligible to serve on the Council. Failure to do so is a breach of the Code of Conduct.
- 39 For Council members, this means also continuing to be eligible to be a trustee of the charity. **Annexe 1** sets out a list of circumstances which may lead to disqualification, removal or suspension under both the Nursing and Midwifery Council (Constitution) Order 2008, the Charities Act 2011 and the Charities and Trustee Investment (Scotland) Act 2005.

- 40 For Associates, **Annexe 2** sets out a list of circumstances which may lead to disqualification, suspension or removal from being an Associate. You may be suspended or removed from office by the Chair of Council on the same conditions as a member of a statutory committee may be suspended or removed under the Statutory Committee Constitution Rules.

Raising concerns

- 41 Council colleagues are expected to work with each other in a collaborative, kind and supportive way. If you have concerns about the behaviour or approach of a colleague on Council, you should act as follows:
- 41.1 In the first instance discuss your concerns with the individual concerned and resolve them if possible.
 - 41.2 If this is not possible, you should raise your concern with the Chair of the Council and seek the Chair's advice.
- 42 The Chair will then decide what approach to take. Options will include:
- 42.1 Meeting with the individuals concerned (separately and/or jointly);
 - 42.2 The appointment of a fellow Council member to look in to the matters raised as a 'neutral' third party; or
 - 42.3 A more structured procedure if appropriate.
- 43 You also have a responsibility to raise concerns about possible wrongdoing:
- 43.1 if they relate to a member of staff, with the Chief Executive and Registrar;
 - 43.2 if they relate to the Chair of the Council, with the Vice-Chair of the Council.

Non-compliance

- 44 Any action, conduct or behaviour which may be a breach of this Code will be dealt with in line with the supporting procedures (currently being reviewed, **see Annexe 3**) for managing complaints about Council members and Associates, including (where appropriate) formal suspension and removal procedures.

Council member – disqualification, removal and suspension criteria

- 1 This is a summary of the legal provisions in paragraphs 5, 6 and 7 of the Nursing and Midwifery Council (Constitution) Order 2008, section 178 of the Charities Act 2011 and section 69 of the Charities and Trustee Investment (Scotland) Act 2005.
- 2 A member may be suspended or removed from office in the following circumstances:
 - 2.1 Where an action by a member causes embarrassment or disrepute to the NMC or the member's continued membership of the Council would undermine public confidence in the regulation of nurses, midwives and nursing associates;
 - 2.2 Where a registrant member's registration becomes lapsed;
 - 2.3 Where a lay member becomes a person who no longer satisfies the criteria for being a lay member as set out in the Nursing and Midwifery Order 2001;
 - 2.4 Where a registrant member becomes the subject of any investigation or proceedings in connection with an allegation of fraudulent entry to the NMC's register;
 - 2.5 Where any investigation or proceedings in connection with an allegation of fraudulent entry to the NMC's register results in the removal of a registrant member's entry in the NMC's register;
 - 2.6 Where a registrant member becomes subject to any investigation or proceedings concerning their fitness to practise by the NMC;
 - 2.7 Where any investigation or proceedings by the NMC results in a registrant member being removed from the register; suspended from the register, or any sanctions or conditions of practice;
 - 2.8 Where a member becomes subject to any investigation or proceedings relating to a serious offence;
 - 2.9 Where a member is convicted of a serious offence in the United Kingdom;
 - 2.10 Where a member is removed from being a trustee, or an officer, agent, or employee of a charity by the Charity Commission, Office of the Scottish Charity Regulator or the Courts and have not been removed from management or control of any body;
 - 2.11 Where a member is disqualified from being a trustee by an order of the Charity Commission under section 181A of the Charities Act 2011;

- 2.12 Where a member is found guilty of disobedience to an order or direction of the Commission under section 336(1) of the Charities Act 2011;
- 2.13 Where a member has been removed, under section 7 of the Law Reform (Miscellaneous Provisions) (Scotland) Act 1990 (c. 40) or section 34 of the Charities and Trustee Investment (Scotland) Act 2005, from being concerned in the management or control of any body;
- 2.14 Where a member is removed from office as the chair, member, convenor or director of any public body on the grounds that it was not in the interests of that body that the member should continue to hold office;
- 2.15 Where a member is adjudged bankrupt;
- 2.16 Where a member is subject to an insolvency order;
- 2.17 Where a member is subject to any disqualification under company law;
- 2.18 Where a member is included in a barred list under legislation pertaining to safeguarding vulnerable groups;
- 2.19 Where a member becomes subject to notification requirements under Part 2 of the Sexual Offences Act 2003, commonly referred to as being on the sex offenders register, or included by the Disclosure and Barring Service in a barred list;
- 2.20 Where a member becomes a designated person for the purposes of: Part 1 of the Terrorist Asset-Freezing etc. Act 2010; or The Al Qaida (Asset Freezing) Regulations 2011;
- 2.21 Where a member becomes subject to any investigation or proceedings concerning their fitness to practise by any licensing body;
- 2.22 Where any investigation or proceedings concerning fitness to practise by any licensing body results in a member being removed from a register; suspended from a register, or any sanctions or conditions of practice.

Associate – disqualification, removal and suspension criteria

- 1 This is a summary of the legal provisions in paragraphs 8, 9 and 10 of the Nursing and Midwifery Council (Practice Committees) (Constitution) Rules 2008.
- 2 An Associate may be disqualified, suspended or removed from office in the following circumstances:
 - 2.1 Where an action by an Associate causes embarrassment, or disrepute to the NMC or would be liable to undermine public confidence in the NMC;
 - 2.2 Where an Associate's NMC registration becomes lapsed (if applicable);
 - 2.3 Where an Associate becomes the subject of any investigation or proceedings in connection with an allegation of fraudulent entry to the NMC's register;
 - 2.4 Where any investigation or proceedings in connection with an allegation of fraudulent entry to the NMC's register results in the removal of an Associate's entry in the NMC's register;
 - 2.5 Where an Associate becomes subject to any investigation or proceedings concerning their fitness to practise by the NMC;
 - 2.6 Where any investigation or proceedings by the NMC results in an Associate being removed from the register; suspended from the register, or any sanctions or conditions of practice;
 - 2.7 Where an Associate becomes subject to any investigation or proceedings relating to a serious offence;
 - 2.8 Where an Associate is convicted of a serious offence in the United Kingdom;
 - 2.9 Where an Associate is removed from the office of trustee for a charity in connection with misconduct or mismanagement in the administration of a charity;
 - 2.10 Where an Associate is removed from office as the chair, member, convenor or director of any public body on the grounds that it was not in the interests of that body that the member should continue to hold office;
 - 2.11 Where an Associate is adjudged bankrupt;
 - 2.12 Where an Associate is subject to an insolvency order;
 - 2.13 Where an Associate is subject to any disqualification under company law;
 - 2.14 Where an Associate is included in a barred list under legislation pertaining to safeguarding vulnerable groups;

- 2.15 Where an Associate becomes subject to any investigation or proceedings concerning their fitness to practise by any licensing body;
- 2.16 Where any investigation or proceedings concerning fitness to practise by any licensing body results in an Associate being removed from a register; suspended from a register, or any sanctions or conditions of practice.

Procedure for handling complaints about Council members

Introduction and scope

- 1 This document sets out the procedure to be followed in dealing with alleged breaches of the Code of Conduct for Council Members (“the Code”).
- 2 The procedure aims to ensure that complaints are resolved fairly, proportionately, and within reasonable timescales. Indicative timescales are set out in the procedure. These may be varied where necessary, for example, because of the nature or complexity of a complaint.
- 3 Any person making a complaint under this procedure will not be treated less favourably as a result of lodging a complaint in good faith. This procedure has been prepared to give effect to the provision above and has been approved (and will be periodically reviewed) by the Council.

Legal representation

- 4 At any stage of an investigation into allegations made against a Member, the Member is entitled to legal representation. The Member will be reminded of this entitlement to advice at each relevant stage of the procedure. If the Member chooses to be legally represented, they must inform the Chair of the name and address of the legal representative.
- 5 Legal representation will be at the Member’s expense. However, depending on the outcome of the investigation, some or all of such costs may be reimbursed at the discretion of the Council.

Procedure for investigating alleged breaches of duty in relation to Members other than the Chair

- 6 If a mutually acceptable outcome is reached between the two members, the complaint will be closed. No report will be made to the Council and the matter will remain confidential. The papers relating to the complaint, including details of the informal resolution, will be placed on the Council member’s file and may be taken into account in the event of a subsequent complaint.
- 7 Should the Chair of the Council feel that problems of conduct remain even after these steps have been taken, then the Chair should seek the advice of the Privy Council.

Preliminary consideration

- 8 If the Chair becomes aware of issues relevant to this procedure relating to a Member, the Chair must:
 - 8.1 inform the Member in writing of the details of the issue and invite them to submit written comments within 14 days, or such other period as may be specified; and
 - 8.2 notify the full Council that they have done so.
- 9 Following consideration of the Member's written comments, if the Chair is satisfied, on the basis of all the information available to them, that any concerns raised are manifestly unfounded, no further action will be taken. The Chair must inform the Member, the full Council and any person who made a relevant allegation of their decision.
- 10 If the Chair is satisfied, on the basis of all the information available to them, that the issue raised is not manifestly unfounded, they must immediately write to the Member concerned:
 - 10.1 stating that the issue will be investigated;
 - 10.2 enclosing a copy of these procedures;
 - 10.3 setting a date for the individual to meet the Chair (preferably within 14 days from receipt of the letter); and
 - 10.4 informing the individual of their entitlement to be accompanied or legally represented at the meeting and at any subsequent stages of the investigation.

Meeting with the Chair

- 11 The Chair will meet the Member concerned to discuss the alleged issue and the Chair will then decide the appropriate course of action to be taken. The Member may be accompanied or legally represented at the meeting by a person of their choice.
- 12 After the meeting, the Chair, having regard to all relevant factors, including the outcome of any further investigation they may consider necessary, will submit a report to the full Council in which they may recommend that the Council should take one or more of the following courses of action:
 - 12.1 dismiss any allegation and/or end the consideration of the issue;
 - 12.2 direct further investigation of any allegation/issue;
 - 12.3 provisionally suspend the individual's appointment to the Council until the Privy Council has reached a decision on whether or not to suspend or remove the member under the Constitution Order; and

- 12.4 direct such other action as the Chair considers necessary.
- 13 On the basis of the report prepared by the Chair, the full Council will determine the matter at a confidential meeting. In accordance with Standing Orders, paragraphs 5.7.5 and 5.7.6 the Council's decision shall be reached by consensus rather than by a vote. Decisions will be reached by means of a vote if:
- 13.1 the Chair feels that no clear consensus has been reached and that there is significant disagreement with, or reservations about, a proposal;
- 13.2 a member requests that a vote be taken;
- 13.3 the Chair concludes, for any other reason, that a vote should be taken.
- 14 Any proposal put to a vote will be decided by a simple majority of the members present and voting. The Member concerned shall not be entitled to vote on this matter. The Chair will declare whether or not a resolution has been carried. In the event of a tie, the Chair will have an additional casting vote.
- 15 If the Council provisionally suspends the Member's appointment, it may direct whether such suspension is to be with or without remuneration.
- 16 If the Council member is removed from office under Article 6(1)(j) of the Constitution Order by the Privy Council, the Member will be notified without delay and in writing, together with reasons for the Privy Council's decision.

Further investigation

- 17 If the Council directs further investigation, it may appoint an Investigating Officer. The Investigating Officer may be an official of the NMC or any other person at the Council's discretion.
- 18 Subject to the whistleblowing arrangements the NMC has in place, the Investigating Officer may seek any further evidence and interview any person, as they consider necessary.
- 19 The Investigating Officer must report their findings of fact to the Member concerned and invite their comments within 14 days, or such other period as may be specified. At the conclusion of the investigation, the Investigating Officer will report their findings together with the Member's comments, if any, to the Council. The Investigating Officer may also make recommendations to the Council.

Notification of decision

- 20 After consideration of the Investigating Officer's report and any recommendations and of any comments made by the Member, the Council will determine the matter. The Council's decision shall require a simple majority of the Members entitled to vote to concur. The Member concerned shall not be entitled to vote on this matter. The Chair will declare whether or not a resolution has been carried. In the event of a tie, the Chair will have an additional casting vote.

- 21 If the Council provisionally suspends the Member's appointment and/or recommends that the Council member is removed from office under Article 6(1)(j) of the Constitution Order by the Privy Council, the Member will be notified without delay and in writing of this fact, together with reasons for the Council's decision.
- 22 If the Council member is removed from office under Article 6(1)(j) of the Constitution Order by the Privy Council, the Member will be notified without delay and in writing, together with reasons for the Privy Council's decision.
- 23 At the conclusion of the investigation and the consideration by the Privy Council, the Council may publicly announce its final decision.

Procedure for investigating complaints made about Members in their professional capacity

- 24 If a complaint in relation to the conduct of a Council Member in a professional or personal capacity is made to or by a professional body or prosecuting authority, they should notify the Chair without delay and the matter will be declared at the next confidential Council meeting.
- 25 If the Chair considers that the issue is one that potentially falls within the scope of this procedure, they will act in accordance with the requirements of this procedure.

Investigations relating to the Chair

- 26 Any allegation or concern relevant to this procedure and relating to the Chair should be made to the Chair of the Audit Committee. The Chair of the Audit Committee will also exercise all of the responsibilities of the Chair of the Council under this procedure if the Chair of the Council has a material conflict of interest in relation to a complaint.
- 27 The Chair of the Audit Committee will inform the Chair of the issue as soon as possible.
- 28 Any investigation relating to the Chair will be carried out by the Chair of the Audit Committee, on the Council's behalf.
- 29 The procedures set out in this document will apply, save that references to the Chair in the conduct of the investigation will be substituted by 'the Council' (or any person the Council directs).
- 30 The Secretary to the Council will keep a record of all complaints received and will report regularly to the Audit Committee on progress in resolving them.