



LEDBURY TOWN COUNCIL

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6 May 2026

To: All Councillors

Dear Councillor

Please find attached To Follow papers in respect of the meeting of **LEDBURY TOWN COUNCIL**, to be held on **Thursday, 7 May 2026 at 7.00 pm** in the **Town Council Offices, Church Lane, Ledbury, HR8 1DH.**

Yours faithfully

Angela Price PSLCC, MIWFM, AICCM
CiLCA (England & Wales)
Town Clerk

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AGENDA

GOVERNANCE

15. To receive any updates in respect of Code of Conduct Matters
(Pages 6519 - 6528)

Distribution: Full agenda and reports to all Councillors (11)
Plus file copy

Agenda and reports excluding confidential items to:
Local press (1), Library (1), Council Website (1)



MONITORING OFFICER DECISION NOTICE

Complaint Number COC0128
Councillor Sinclair of Ledbury Town Council

DECISION

That Councillor Ewen Sinclair **DID** breach Ledbury Town Council's ('LTC') Code of Conduct as follows:

- 1.2 - Treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play.
- 2.1 - I do not bully any person.
- 2.2 - I do not harass any person.
- 4.1 - (a) I do not disclose information given to me in confidence by anyone;
- 8.3 - I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings
- 8.4 - I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct

That Councillor Sinclair **DID NOT** breach the following parts of LTC's Code of Conduct:

- 8.1 - I undertake Code of Conduct training provided by my local authority.

COMPLAINT

On 11 September 2025, the Council received a complaint that Councillor Sinclair had failed to comply with the Code of Conduct of LTC. The complainant alleged that Councillor Sinclair has failed to observe the Code of Conduct for members, adopted by LTC, by the following alleged conduct:

The complainant alleged that Councillor Sinclair has acted in a way which disrespects, harasses and sometimes bullies the Town Clerk.

The complainant alleged Councillor Sinclair has mishandled confidential information and failed to treat such information in the appropriate manner.

The complainant alleged Councillor Sinclair had failed to comply with the recommendations set out in the determinations of Code of Conduct Complaints COC01216, COC045 and COC090, such failure itself representing a breach of the Councillor Code of Conduct of Ledbury Town Council.

PROCEDURE

An Investigator was asked to carry out an investigation into the facts. The evidence he collected and used to form his conclusions was:-

- Complaint documents and appendices dated 11.09.2025 - Appendix 1 and 1A
- Response from Councillor Sinclair dated 21.12.2025 - Appendix 2
- Interview with Complainant's Witness Angela Price, Clerk to Ledbury Town Council dated 11 December 2025 – Appendix 3

- Email Correspondence Provided by Angela Price - Appendix 4
- Councillor and Staff Training Matrix - Appendix 5
- Interviews with Subject Member dated 16.01.2026 and 05.02.2026 - Appendix 6
- Email correspondence provided by Councillor Sinclair - Appendix 7
- Interview with Complainant Councillor Harvey dated 20.02.2026 - Appendix 8
- Ledbury Town Council Complaints Policy - Appendix 9
- Ledbury Town Council Harassment, Victimisation and Bullying Policy - Appendix 10
- Ledbury Town Council Grievance Policy - Appendix 11
- Ledbury Town Council Staff Councillor Protocol - Appendix 12
- Minutes of LTC Full Council on 28 September 2023 - Appendix 13
- Minutes of LTC Full Council 25 January 2024 – Appendix 14
- Minutes of LTC Full Council 28 February 2024 – Appendix - 15
- Minutes of LTC Resources Committee 3 July 2025 - Appendix 16
- Full Council Agenda 24 July 2025 – Appendix 17
- Minute of Full Council 24 July 2025 – Appendix 18
- Decision Notice COC1216 dated 17 October 2022 – Appendix 19
- Councillor Sinclair’s apology to the Clerk in respect of COC045 – Appendix 20
- AP’s comments on Councillor Sinclair’s apology - Appendix 21
- 25 March 2026 – Email from Complainant in response to draft investigation Report – Appendix 22.
- 7 March 2026 – Email and attachment from the Subject Member in response to draft report – Appendix 23

FINDINGS

In accordance with the assessment of all Code of Conduct matters, I considered the evidence on the balance of probabilities, that is: would a reasonable person in possession of all the facts and viewing them objectively, consider that it is more likely than not that the subject member has breached the Code of Conduct.

Section 27 (2) of the Localism Act provides that the Code of Conduct applies only when a member is acting in his or her capacity as a member. At all material times, I consider that Councillor Sinclair was acting in his capacity as a member of Ledbury Town Council.

Allegation: The complainant alleges that Councillor Sinclair has acted in a way which disrespects, harasses and sometimes bullies the Town Clerk. The complainant also cites paragraph 8.3 - intimidation as an alleged breach of the Code of Conduct. The complainant particularly highlights email correspondence sent between Councillor Sinclair and the Clerk during the period 6 May 2025 and 23 August 2025.

The evidence provided in the written documents and in evidence obtained at interview established, in my view, from the time Councillor Sinclair joined LTC there was a very challenging relationship between the Clerk and Councillor Sinclair.

Both the complainant and Councillor Sinclair make reference to a previously determined complaint, COC045. Councillor Sinclair’s written response to the current complaint provides a significant amount of information dealing directly with matters considered in COC045. Since that complaint was resolved over two years ago, it was not within the remit of the Monitoring Officer to re-investigate that complaint. However, these matters were considered as part of the context of the

current complaint and the working relationship and interactions between the Complainant, the Clerk and Councillor Sinclair.

The complainant refers to an email sent by Councillor Sinclair to West Mercia Police on 8 June 2023, that email formed part of the evidence considered in COC045, in the email Councillor Sinclair made allegations against the Clerk, that Councillor Sinclair described to the Police as a crime.

In his evidence, Councillor Sinclair said he believed his actions were necessary because of his concerns in respect of the management of a project dealing with the War Memorial.

In interview, the Clerk said that when she became aware of the content of the email it had had a significant effect on her, she explained it was 'awful' to read the content of the email and that Councillor Sinclair had written to people in these terms; the Clerk said she is still upset by the thought of this email being sent. The Clerk explained that Councillor Sinclair obviously believes that she is liar, is not doing her job and her professionalism is brought into question.

I noted in the outcome of COC045, that Councillor Sinclair was found to have harassed the Clerk as a result of the email he sent to West Mercia Police. In his evidence, Councillor Sinclair was clear that he considers that the issues in COC045 are still very relevant and are unresolved. It was clear to me, that Councillor Sinclair's views in respect of the Clerk's involvement in COC045 remain unchanged. I am of the view that the relevance of this today, lies in the impact of that background on the Clerk, I believe that the Clerk is mindful of these views when she is dealing with challenges from Councillor Sinclair.

I considered Councillor Sinclair's emails between 6 May 2025 and 23 August 2025, that the complaint alleges are in breach of the Code of Conduct and I have reflected on the language used in this exchange and the context in which they were sent.

It is my view that the emails Councillor Sinclair sent to the Clerk are challenging and could be considered to be intimidating, particularly when viewed by the Clerk. I agreed with the investigator that potentially, taken in isolation, the points made by Councillor Sinclair in his emails may not be so inappropriate as to constitute a breach of the Code of Conduct, however, the emails must be considered as a whole email exchange and in the context of the history between the Clerk and Councillor Sinclair.

When the Clerk responded to Councillor Sinclair's emails, it was my view these were suitable responses, setting out the Clerk's position and proposed actions.

Councillor Sinclair's email to the Clerk on 12 May 2025 stated:

'The answer you provided is unacceptable. Two members of staff lied about a Cllr, in order to influence the outcome of a code of conduct complaint.....As line manager for all staff this is within your remit and must be dealt with'.

In my opinion the language used in this email is accusatory and demanding. Councillor Sinclair makes it clear he does not accept the response of the Clerk. It was my view that the force and tone of the email was inappropriate. The bluntness with which the response is drafted I think is designed to press for a reaction and can be considered intimidating.

Councillor Sinclair's email to the Clerk on 20 May 2025, was in my opinion challenging and inappropriate. At interview, the investigator asked Councillor Sinclair if he had reflected on the language used in this email, Councillor Sinclair accepted that his response was

robust, but said it reflected his frustration at the way a fellow Councillor had been treated. Councillor Sinclair felt that had there been greater openness, the email would not have been necessary.

I concluded the email sent by Councillor Sinclair on 20 May 2025, was intimidating, harassing, disrespectful and bullying, particularly when viewed as part of the email exchange.

I then considered the email sent by Councillor Sinclair on 23 August 2025. The Investigator asked whether this could be perceived as a threat or an attempt to put pressure on the Clerk. Councillor Sinclair said it was not intended as a threat but accepted it was intended to put pressure on the Clerk, explaining he was responding to allegations against him. Having considered the wording of this email, I believe that it could be viewed as threatening and it did seek to put pressure on the Clerk.

Councillor Sinclair has stated that he sent the email in his personal capacity and not in his capacity as Councillor and he did not consider it to be council business. The Investigator considered this point and noted Section 27 (2) of the Localism Act 2011 which provides that the Code of Conduct applies only when a member is acting in his/her capacity as a member. In accordance with the assessment of all Code of Conduct matters, the evidence was reviewed on the balance of probabilities. My view is that Councillor Sinclair was acting as a Councillor in this instance.

At interview, the Investigator asked Councillor Sinclair whether, on reflection, he would have approached matters differently. Councillor Sinclair explained that in his view, the concerns he was raising were being disregarded, therefore he considered his actions were justified.

Councillor Sinclair is unequivocal throughout his evidence that, in his view, the decisions in determined Code of Conduct complaints COC45, COC090 and COC093 are flawed, are unresolved and the issues still exist. I believe these views pervade and influence many of his interactions with the Clerk and the wider membership of LTC. He has a strong sense of unfairness and inequity about this and how the Code of Conduct process is administered in Herefordshire. As a result of Councillor Sinclair's strongly held views, he considers that his email correspondence is justified.

I have considered the evidence obtained during the investigation, which includes email exchanges between Councillor Sinclair and the Clerk outside of the complaint period, provided by Councillor Sinclair. It is my view that there are many examples where Councillor Sinclair is appropriate in the way he corresponds with the Clerk and where the interactions between the Clerk and Councillor Sinclair are without issue. This is also reflected in the evidence of both the Clerk and the Complainant.

However, both the Clerk and the Complainant explained in their evidence, that when Councillor Sinclair is addressing an issue he feels strongly about and he is not receiving the responses he wants, his frustration becomes evident in his correspondence. In my view, when this is considered from the perspective of the Clerk's and her experiences with Councillor Sinclair, the emails can be seen as disrespectful, bullying, harassing and intimidating.

The complaint document states that as well as receiving emails from Councillor Sinclair, the Clerk has received a number of telephone calls from him which she has found harassing and upsetting.

Councillor Sinclair in his evidence stated he does not call the Clerk on her mobile and all telephone calls to LTC are recorded, therefore there should be a record of the calls referred to in the complaint. Councillor Sinclair also pointed out that the Clerk has contacted him on the telephone

during the complaint period and that the Clerk is comfortable to contact him both by telephone and email and there does not appear to be any issue with her doing this.

The investigation found that there are no recordings of the telephone calls in which it is alleged Councillor Sinclair's behaviour has breached the Code of Conduct. Therefore, I did not have any independent evidence to consider in order to determine whether Councillor Sinclair has conducted himself during telephone calls in a way that has breached the Code of Conduct. The evidence in respect of telephone calls between Councillor Sinclair and the Clerk is disputed. I therefore cannot make a finding in respect of the telephone calls.

In reaching my decision, I have looked at the evidence from both the perspective of the Clerk, and Councillor Sinclair. Having considered Councillor Sinclair's responses during interview, I could not be sure to what extent he appreciated the impact his actions had on the Clerk and as a result, the way the Clerk perceived his challenges in correspondence.

I am mindful of the LGA Guidance on bullying, which states that such conduct is usually part of a pattern of behaviour which attempts to undermine an individual, is detrimental to their confidence and capability, and may adversely affect their health. When reading the email exchanges between Councillor Sinclair and the Clerk, I think they do fit with the pattern of behaviour described by the guidance. In Councillor Sinclair's emails he has made detrimental and inappropriate comments about other Councillors and employees and made inappropriate comments about the Clerk's performance in her role. He has also used language that I considered to be threatening and intimidating.

The guidance states that bullying behaviour should be contrasted with the legitimate challenges which a councillor can make in scrutinising performance; they are entitled to challenge officers as to why they hold their views. However, if the criticism is a personal threat, abusive or offensive in nature, they are likely to cross the line of what is acceptable behaviour. In this case, I considered that incidents of bullying are evidenced in Councillor Sinclair emails which contained intimidatory language and inappropriate comments about the Clerk's performance.

Further to this, having considered the guidance, bullying is not dependent on the intention of the person responsible for that behaviour/conduct. The background of COC045 is important, the Clerk's evidence is clear, since COC45, she has felt her performance and professionalism has been questioned by Councillor Sinclair and that she believes Councillor Sinclair thinks she is a liar and she is not capable of doing her job. Further to this, when Councillor Sinclair accuses other members of staff or Councillors of lying, the Clerk feels he is referring to her as well.

I considered the LGA guidance and factors to be taken into account when assessing allegations of harassment. One of the key considerations is whether the councillor knows or ought to know that their actions constitute harassment, whether a reasonable person would consider the actions to be harassment and the impact of the behaviour/conduct on a person. I was mindful of the finding in COC045, which found Councillor had breached the code of conduct in respect of harassment, therefore I believe Councillor Sinclair ought to have known the kind of action that could breach this element of the Code of Conduct. In this case I considered that incidents of harassment are evidenced in Councillor Sinclair's emails which contained intimidatory language and inappropriate comments about the Clerk's performance.

In reaching my decision on this allegation, I considered Article 10 rights, in relation to code of conduct allegations and the relevant case law on enhanced protection given to "political expression." It is my view that Councillor Sinclair's emails have exceeded what is acceptable in challenging and scrutinising the Clerk. I considered that the nature and content of the emails to the Clerk, go beyond what a non-elected public servant should reasonably be expected to experience.

I find that Councillor Sinclair's emails to the Clerk fall outside the protection provided to him by Article 10; they are not in my view protected under political debate. Councillor Sinclair's views about the Clerk's role in the COC045 are strongly held and remain current and are an undertone to his interactions with the Clerk. The Clerk is aware of these views when she is challenged by Councillor Sinclair. The evidence of the Clerk indicates that Councillor Sinclair's behaviour towards her has had a significant impact upon her and her wellbeing.

Therefore, on a balance of probabilities and taking into account the evidence presented and his strongly held views in respect of the Clerk, I find that Councillor Sinclair has acted in a way which disrespects, harasses, intimidates and sometimes bullies the Clerk and that this does amount to a breach paragraphs 1.2, 2.1, 2.2 and 8.3 of the Code of Conduct.

I DO find this to be a BREACH of paragraphs 1.2, 2.1, 2.2 and 8.3 of the Code of Conduct: '1.2 - Treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play, 2.1 - I do not bully any person. 2.2 I do not harass any person, and 8.3 - I do not intimidate or attempt to intimidate any person who is likely to involved with the administration of any investigation or proceedings

Allegation: Despite previously upheld complaints regarding his behaviour, Councillor Sinclair continues to act in a way which breaches the requirement to treat confidential, personal, legal or commercially sensitive information in an appropriate manner.

- a. **The complaint document cites an email dated 6 May 2025, in which it is alleged Councillor Sinclair has circulated confidential Standard Panel papers to third parties.**

It is not disputed that the email dated 6 May 2025 was sent to third parties and attached to that email were confidential Standards Panel papers for Code of Conduct Complaint COC093. Of those copied into that email, only one recipient was entitled to access to these papers.

I am aware that COC093 went to Standards Panel and a preliminary decision of the Panel was to hold the hearing in private session, with press and public excluded, the hearing papers were not published and only the Decision Notice from this hearing was published. It is evident that the purpose of the email sent by Councillor Sinclair was to draw attention to a recent Code of Conduct complaint that had been heard by the Standards Panel.

When the investigator asked Councillor Sinclair about the allegation of breaching confidentiality, Councillor Sinclair responded that in his view, since the hearing was concluded, the material was no longer confidential. The investigator clarified with Councillor Sinclair that Standards Panel papers remain confidential even after a hearing concludes, and that only the Decision Notice is published. Councillor Sinclair restated his position, that following the conclusion of the hearing, the papers were no longer confidential, in his opinion, as people had acted unfairly, sharing the papers was justified.

I considered the fact the Councillor Sinclair himself has been the subject of three Code of Conduct complaints, one of which went to a Standards Panel. I further considered that Councillor Sinclair supported a fellow Councillor through a fourth complaint, that also went to a Standards Panel and was heard in private session. It is my view that Councillor Sinclair should have been aware of the requirements of confidentiality within the Code of Conduct process. Councillor Sinclair

demonstrated in his evidence that he is cognisant of matters relating to data protection and GDPR and the need to follow process when obtaining and using information.

I concluded that Councillor Sinclair ought to have known the Standards Panel papers remained confidential after the process had concluded and should not have been shared with third parties who were not part of that complaints process. I agreed with the view of the Investigator, that Councillor Sinclair's explanation and justification for circulating the Standards Panel papers lacked credibility.

I DO find this to be a BREACH of paragraph 4.1 - (a) I do not disclose information given to me in confidence by anyone.

- b. The complaint document also cites an email dated 23 August 2025, in which it is alleged Councillor Sinclair has circulated an image taken from the Councillor / Employee attendance register without consent.**

The content of the email sent by Councillor Sinclair dated 23 August 2025 is not disputed, the email included an image of LTC office's Councillor / Employee attendance register. The register showed which employees and councillors had attended the office on 8 January 2025 and between what times. I have considered the investigator's assessment of the information contained within the register and I agree that this information would be classed as personal data, and I do not consider the register contains any sensitive information.

I noted that the email was sent to the Clerk, and two other Councillors, all of whom would have access to this register and the information contained within it.

It was stated in the complaint that Councillor Sinclair failed to get the consent of the Clerk to copy this information. It was the evidence of the Clerk that this document is not a public facing document and that consent should have been obtained by Councillor Sinclair to take a copy of it.

Councillor Sinclair in his evidence said that when he obtained a copy of the register he went into the office and spoke to the Deputy Clerk and was provided a photocopy of it.

In Councillor Sinclair's email he did state that he was happy to make his email correspondence public, as it was his view there was nothing confidential in any of the emails. From the evidence, I cannot determine whether Councillor Sinclair would have followed through with this action and whether this would have included the image of the attendance register, but it can be viewed as a threat to do so. It is my view that had Councillor Sinclair disseminated the information from the attendance register outside of the council, then this may have amounted to a breach of the Code of Conduct.

However, I find that Councillor Sinclair obtained this information and sent it to members of the council who would also have had access to it. As such, I do not consider this to be a data breach, and I do not find it to be a breach of the code of conduct.

I DO NOT find this to be a BREACH of paragraph 4.1 - (a) I do not disclose information given to me in confidence by anyone.

Allegation: Councillor Sinclair's refused to comply with previous recommendations of the Monitoring Officer and Standards Panel to undertake training on GDPR and Code of Conduct.

The complainant states that Councillor Sinclair has failed to comply with the recommendations set out in the determinations of Code of Conduct complaints COC01216, COC045 and COC090, such failure itself representing a breach of the Councillor Code of Conduct of Ledbury Town Council.

In respect of COC1216, this Code of Conduct complaint was determined on 17 October 2022 and found that Councillor Sinclair had breached Standard of Conduct A.3 of the LTC Code of Conduct. The recommendation was that Councillor Sinclair attend the next Code of Conduct training arranged by the Clerk.

The Councillor and Staff Training Matrix provided by the Clerk shows that councillors undertook Code of Conduct training on 15 March 2022 and 3 August 2022. Both training sessions pre-date the Code of Conduct recommendation dated 17 October 2022. The records show that Councillor Sinclair did attend Code of Conduct training on 11 September 2023. On balance, based on the evidence available to me, I cannot conclude that Councillor Sinclair failed to comply with the recommendation in COC1216.

In respect of COC045, this Code of Conduct complaint was determined on 29 January 2024, and it was recommended that Councillor Sinclair should make a private written apology to the Town Clerk and also make an apology to LTC.

The evidence shows, Councillor Sinclair did write to the Clerk and provide an apology in a letter dated 20 January 2024. In respect of the apology, the Clerk did not feel that it made up for the accusations and insinuations he made against her and she did not feel Councillor Sinclair was apologising for his actions but for the way it may have made her feel.

The investigation reviewed the minutes from a meeting of LTC Full Council held on 25 January 2024, which evidences Councillor Sinclair made an apology in the form of a statement at this meeting. The statement was not accepted as an apology and the minutes of an Extraordinary Meeting of Full Council on 28 February 2024 resolved that the statement be struck from the record. There is no reference to Councillor Sinclair having made any further apologies in respect of COC045 to LTC Full Council.

The evidence in the report is clear that Councillor Sinclair does not accept the findings in COC045 and there is no genuine acknowledgement of any failure on his part. The apologies provided by Councillor Sinclair relating to COC045 were not considered by the Clerk or the Complainant to adequately address the breaches.

The Monitoring Officer's decision was that no further public interest would be served by referring the matter to Standards Panel. Therefore, it is unclear as to whether Councillor Sinclair complied with the recommendations of COC045. Councillor Sinclair says in his response document that he provided apologies, broadly the evidence is he did provide apologies. However, the apologies were not accepted by the Complainants in that case.

Councillor Sinclair's evidence in this present case supports the suggestion that the apologies he provided were inadequate. Councillor Sinclair has repeated in strong and clear terms the same allegations he made previously. However, based on the evidence I have seen I cannot make a finding in respect of this.

In respect of COC090, the Code of Conduct complaint proceeded to a Standards Panel on 4 February 2025. The Standards Panel recommended that LTC arrange Code of Conduct and GDPR training for Councillor Sinclair. The Panel further recommended that Councillor Sinclair

should make a written apology to the Complainant for his conduct and that such apology should be minuted at the next Full Council meeting of LTC.

Councillor Sinclair in his evidence clearly expressed, his consistent view, that the findings and decisions made against him by the Standards Panel in COC090 are based on lies and that the outcome of the investigation was engineered.

In Councillor Sinclair's written response, he addresses the issue of providing an apology to the Complainant, and states: *'The complainant in this case stated he did not want an apology.'*

In Councillor Sinclair's response document, he provides his response to an email from the Clerk, dated 8 May 2025, in which the Clerk was seeking confirmation as to whether he would attend Code of Conduct training further to the recommendations of the Standard Panel. Councillor Sinclair responded to say that: *'I was found in breach because the Senior Governance Lawyer lied to the Standards Panel...I am a volunteer and no-one tells me what to do or where to be, so no.'*

Based on Councillor Sinclair's own evidence, he does not accept the findings from COC090 and he has not complied with the recommendations of the Standards Panel. From his evidence, it is Councillor Sinclair's view that if the Code of Conduct was applied justly and fairly, he would have respect for it. However, Councillor Sinclair consistently states that he has a significant distrust in the Code of Conduct process as administered by Herefordshire Council. Councillor Sinclair does not consider that it is applied fairly or equitably.

For the purposes of this decision, I cannot be clear that Councillor Sinclair failed to comply with the recommendations of the decision in COC1216; it is reasonable to say that there was an attempt at complying with the recommendation in COC045 in providing apologies albeit the apologies were not accepted. However, as a matter of fact, Councillor Sinclair has not complied with the recommendations of the Standards Panel following the decision in COC090 and has stated his reasons in his evidence.

I DO NOT find this to be a breach of paragraph 8.1 - I undertake Code of Conduct training provided by my local authority.

I DO find this to be a BREACH of paragraph 8.4 - I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct

CONCLUSION

In accordance with S28(7) Localism Act 2011 I have sought and taken into account the views of two Independent Persons appointed by Herefordshire Council for the purposes of the Act. The Independent Persons agree that Cllr. Sinclair has breached the following parts of the Ledbury Town Council's Code of Conduct.

- 1.2 - Treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play.
- 2.1 - I do not bully any person.
- 2.2 - I do not harass any person.
- 4.1 - (a) I do not disclose information given to me in confidence by anyone;
- 8.3 - I do not intimidate or attempt to intimidate any person who is likely to involved with the administration of any investigation or proceedings

- 8.4 - I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct

That Councillor Sinclair **DID NOT** breach the following parts of LTC Code of Conduct:

- 8.1 - I undertake Code of Conduct training provided by my local authority.

The Council's procedure for dealing with Code of Conduct complaints states that the Monitoring Officer has the following options upon completion of a formal investigation:

1. There has been no breach and therefore no further action will be taken;
2. There have been one or more breaches, but no further action is needed;
3. There have been one or more breaches, but the matters should be resolved in a way other than by a hearing; or
4. That the matters be referred to a hearing.

In light of the recommendations for resolution in the final investigation report and my findings in this matter, I propose resolution, in accordance with point 3, that there have been one or more breaches, but that matters should be resolved in a way other than by a hearing.

Accordingly, I have recommended to the Town Council that the following actions be undertaken:-

- (i) Councillor Sinclair should make a written apology to the complainant, for the inappropriateness of his email correspondence and behaviour. The apology should be approved by the Monitoring Officer, before it is sent to the complainant, so far as scope and tone is concerned.
- (ii) The Monitoring Officer consults with the complainant to determine what safeguards, processes or procedures could be considered, to try to build trust and confidence between Councillor Sinclair and the complainant. If the Monitoring Officer considers such measures are appropriate and achievable then such measures will be put in place.
- (iii) Councillor Sinclair should undertake training, to be arranged by the Town Council/Council. The training should include updated Code of Conduct and Data Protection/GDPR training.

Following receipt of the Draft Investigation Report, Councillor Sinclair submitted his resignation as a Councillor for LTC. The recommendation that Councillor Sinclair apologises to the Complainant remains unchanged. Recommendation (ii) and (iii) shall be held in abeyance, as provisions, should Councillor Sinclair be re-elected as a Councillor to LTC and should take place within 3 months of being elected. Further to this, recommendation (iii) will apply should Councillor Sinclair be elected to another Council in the future and should take place within 3 months of being elected.

There is no right of appeal against this decision notice.



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Monitoring Officer
Dated: 27 April 2026