

# Investigation Report

## Complaints against Councillor Charmaine Morgan

South Kesteven District Council

**2 March 2026**

**FINAL**

## Index

### **Code of Conduct Report**

Investigation Report\_ Complaints Against Cllr Charmaine Morgan Final 2 - 17

### **Appendix 1 Complaint 1 and Complaint 2**

Complaint from Cllr Baxter 18 - 22

Complaint from Cllr Dilks 23 - 32

### **Appendix 2 Cllr Morgan's Initial Response**

Email from Subject Member to MO re response to complaints 33 - 42

### **Appendix 3 Cllr Morgan's emails re IT problems**

Fwd: Ref 030278.0006 43 - 44

### **Appendix 4 Cllr Morgans Register of Interest**

Register of Interest for Councillor Charmaine Morgan 45 - 46

### **Appendix 5 Cllr Morgans comments on the draft report**

Cllr Morgan Response to draft report - 23.02.26 47 - 51

### **Appendix 6 Investigation Chronology**

Investigation Chronology multiple complaints 1 report 52

## **Code of Conduct Report**

## 1. INTRODUCTION

- 1.1 This is a report considering complaints submitted by Councillor Ashely Baxter of South Kesteven District Council (“Cllr Baxter”) and Councillor Phil Dilks of South Kesteven District Council (“Cllr Dilks”) alleging that Councillor Charmaine Morgan of South Kesteven District Council (“Cllr Morgan”) breached the South Kesteven District Council Councillor Code of Conduct (“the Code”) of South Kesteven District Council (“the Council”).
- 1.2 I am a Solicitor of the Senior Court of England and Wales and a Partner in the firm Anthony Collins Solicitors LLP. I qualified as a solicitor in 2003 and had a career working in two local authorities from then until 2022 when I moved into private practice. During that time, I held positions such as Head of Legal Services, Monitoring Officer, Assistant Director, and Interim Deputy Chief Executive. During my career I have carried out many investigations including alleged breaches of a code of conduct by councillors.

## 2. THE COMPLAINTS

- 2.1 With the agreement of the Council’s Interim Monitoring Officer, Cllr Baxter and Cllr Dilks, this single report covers the investigation of the complaints submitted by:
  - Cllr Baxter on 5 December 2025 (“Complaint 1”); and,
  - Cllr Dilks on 15 December 2025 (“Complaint 2”);Together referred to as the “Complaints”.
- 2.2 In summary, the Complaints allege that whilst acting in her capacity as the Chair of the Council’s Planning Committee, she sent an email to the clerk of Grantham Town Council (the “Town Council”), copying in other Town and District Councillors, misusing her position by instructing, and thereby seeking to influence, a Town Council officer to amend the consultation response received from the Town Council in relation to a live planning application to the Council which Cllr Morgan had ‘called-in’, in her capacity as a member of the Council. It is further alleged that in doing so, Cllr Morgan also sought to inappropriately alter the established governance arrangements between the Town Council and the Council, compromise the impartiality of the Town Council officer and was disrespectful to them too. The Complainants further allege that Cllr Morgan’s actions raise issues of apparent bias, predetermination on her part, and misuse of her position, and that she also did not declare her position on the Town Council Planning Committee as an interest at meetings of the Council Planning Committee.
- 2.3 Cllr Baxter is the Leader of the Council. Cllr Dilks is the Council’s cabinet member for planning.

### 3. THE INVESTIGATION

- 3.1 In accordance with the Council's Procedure for Dealing with Code of Conduct Complaints Against Councillors (the "Arrangements"), the Complaints were initially considered by the Monitoring Officer, in consultation with the Council's "Independent Person" ("IP"), although the IP felt that one aspect of the complaint (disrespect) did not need to be investigated as it could be resolved informally. The Monitoring Officer decided that the entirety of the Complaints should be referred for investigation because the allegations were all linked to the email that was sent. The Monitoring Officer appointed me as an external investigating officer to undertake the investigation.
- 3.2 The terms of reference for this investigation in respect of the Complaints are to:
  - 3.2.1 establish the specific facts surrounding the alleged failure of Cllr Morgan to comply with the Code;
  - 3.2.2 consider if Cllr Morgan was acting in the capacity of a councillor at the time of the alleged conduct and;
  - 3.2.3 establish whether there is sufficient evidence to justify a finding of a failure to comply with the Code.
- 3.3 In undertaking this investigation, I have read:
  - 3.3.1 Cllr Baxter's email of 5 December 2025 to the Monitoring Officer and an email chain (which includes Cllr Morgan's email of 27 November 2025 to Chloe Goswell, (the Clerk) via [admin@granthamtowncouncil.org.uk](mailto:admin@granthamtowncouncil.org.uk) (Complaint 1);
  - 3.3.2 Cllr Dilks' emailed letter of 15 December to the Monitoring Officer, Annexe 1 of which is a reproduction of Cllr Morgan's email of 27 November 2025 to the Clerk to the Town Council; (Complaint 2);
  - 3.3.3 Cllr Morgan's initial response to Complaint 1 by way of her email of 15 December 2025 to the Monitoring Officer;
  - 3.3.4 Cllr Morgan's register of interests with the Council.
- 3.4 I also met with Cllr Morgan and Cllr Dilks as detailed below under section 6.
- 3.5 This report is my work, any errors or admissions are mine alone. I have not at any stage been put under pressure as to what to investigate or not to investigate, or as to what findings and facts should or should not be made. I conducted all the interviews myself and I sought to test the accounts provided although I did not cross examine those with whom I spoke.
- 3.6 The investigation of the Complaints is not governed by the strict rules of evidence appropriate to court proceedings, and concepts such as the burden of proof and standard of proof which are applicable in legal proceedings do not apply to this investigation. However, as a general requirement of fairness, I have treated the burden of establishing any complaint as resting on the person who complained. I have made findings and found facts on the basis that the applicable test is the balance of

probabilities. This means something is more likely than not to have happened and is a lower threshold than the criminal test more often known as beyond reasonable doubt.

- 3.7 This report was sent in draft to the Monitoring Officer, the Cllr Morgan, Cllr Baxter and Cllr Dilks for comment. Cllr Morgan provided her response which I have taken into account in finalising the report. I have not had any comments from the two subject members.

#### **4. THE CODE OF CONDUCT**

- 4.1 Section 27 of the Localism Act 2011 requires the Council to adopt a code of conduct to provide for what is expected of councillors when they are acting in their capacity as a member of the Council.
- 4.2 The Council's Code is the Model Councillor Code of Conduct 2020 ("the Model Code" prepared by the Local Government Association ("the LGA").
- 4.3 The Council last adopted the Code as Part 5 (2) of its constitution, and the Arrangements as Part 5 (3) of its constitution on 18 November 2025.
- 4.4 The seven principles of public life known as the Nolan Principles require councillors to treat all persons fairly, with respect and act in a way that secures public confidence in their roles. These Nolan Principles are set out in Appendix A of the Code.
- 4.5 Building on the Nolan Principles, general principles have been developed specifically for the role of councillors as set out in Sections 1 – 10 of the Code which are the minimum standards of conduct required.
- 4.6 Overall, the Complainants allege that the conduct of Cllr Morgan has breached the following elements of the Code:
- 4.6.1 Paragraph 1.1 I 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;
  - 4.6.2 Paragraph 3.1: I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority;
  - 4.6.3 Paragraph 5.1: I do not bring my role or local authority into disrepute; and,
  - 4.6.4 Paragraph 6.1: I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.
  - 4.6.5 Paragraph 9.1: I register and disclose my interests.

#### **5. OFFICIAL CAPACITY**

- 5.1 In accordance with section 27 of the Localism Act 2011, the Code applies where members of the Council are acting in their capacity as such.

5.2 As set in the Code under 'Application of the Code', the circumstances in which members of the Council will be acting in their capacity as such include:

- when you are acting in your capacity as a councillor;
- when you misuse your position as a councillor;
- when 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.
- the Code applies to all forms of communication and interaction, including:
  - all face-to-face meetings;
  - at online or telephone meetings;
  - in written communication;
  - in verbal communication;
  - in non-verbal communication;
  - in electronic and social media communication, posts, statements and comments.
- you are also expected to uphold high standards of conduct and show leadership at all times when acting as a councillor.

## 6. EVIDENCE

6.1 Complaint 1 and Complaint 2 are appended to this report at appendix 1.

6.2 Cllr Morgan's response to Complaint 1 is appended to this report at appendix 2. Cllr Morgan did not provide a separate initial response to Complaint 2.

6.3 Via Microsoft Teams, I met with:

6.3.1 Cllr Morgan on 16 January 2026;

6.3.2 Cllr Dilks on 19 January 2026.

6.4 Cllr Baxter confirmed that he had nothing to add to his written complaint and as such was happy not to meet with me, but would be willing to do so should I deem it necessary which I concluded after meeting Cllr Dilk and Cllr Morgan that it was not.

6.5 A summary of the evidence of Cllr Baxter, Cllr Dilks and Cllr Morgan is set out below.

### Cllr Baxter

6.6 In his complaint email of 5 December 2025 to the Monitoring Officer, Cllr Baxter says that in her email of 27 November 2025 to the Clerk to the Town Council, Cllr Morgan tells the Clerk that she has acted inappropriately and undermined elected representatives likely to speak at the forthcoming Council's Planning Committee. Cllr Baxter says that Cllr Morgan instructs the Clerk to revise the Town Council's submission in respect of a planning application made to the Council's Planning Committee to reflect

Cllr Morgan's preferred narrative on the application. Cllr Baxter states that in other regards Cllr Morgan's email to the Clerk is patronising. Cllr Baxter says that he understands that Cllr Morgan has lobbied the Vice-chair of the Council's Planning Committee on the planning application. Cllr Baxter says Cllr Morgan emailed the Clerk from her Council email account and as such was clearly acting in her capacity as a member of the Council, and as Chair of the Council's Planning Committee.

- 6.7 Cllr Baxter includes as more detailed grounds of his complaint the email of 27 November 2025 from Councillor Tim Harrison ("Cllr Harrison") in which he raises concerns as to Cllr Morgan's email to the Clerk. I understand that Cllr Harrison is a member of the Council and the Council's Planning Committee, and also a member of the Town Council. He received the email from Councillor Cunningham. I understand that Cllr Cunningham is a member of the Council, a member of the Town Council and Chair of the Town Council's Planning Committee and was copied into the original email. The email chain is included in Cllr Baxter's complaint email at appendix 1 of this report.

### Cllr Dilks

- 6.8 In his letter of complaint to the Monitoring Officer Cllr Dilks says that he believes Cllr Morgan's email of 27 November 2025 to the Clerk to be a clear and improper attempt by Cllr Morgans to use her position as Chair of the Council's Planning Committee to influence or lobby the Clerk and apply pressure to change the previously published response of the Town Council to a planning application. Cllr Dilks says that as per the mandatory annual training for members of the Council's Planning Committee, it is his understanding that members of the Council's Planning Committee should not also be members of a parish or town council planning committee, and should not in any event seek to influence how a parish or town council responds to a planning application. Cllr Dilks says that as of 15 December 2025 Cllr Morgan is listed on the Town Council's website as a member of the Town Council Planning Committee which he considers an unacceptable conflict of interests, and he notes that Cllr Morgan has not entered her membership of the Town Council or its planning committee in the register of interests for members of the Council.
- 6.9 Cllr Dilks says that Cllr Morgan's email opens with comment:

*"Whilst preparing for the Dudley Road HMO SKDC Planning Committee I have been reviewing comments...."*

Cllr Dilks says that Cllr Morgan goes on to challenge the Town Council's previously published response to the application in which she warns the Clerk that 'no objection' carries weight and then unreasonably directs the Clerk as to how the Town Council's response should be changed from 'no objection' to 'concerns raised...'. Cllr Dilks considers that a reasonable member of the public reading Cllr Morgan's email would conclude that Cllr Morgan was seeking to use her position as Chair of the Council's Planning Committee to instruct the Clerk to change the Town Council's response to the planning application.

6.10 Cllr Dilks says Cllr Morgan's email states:

*"A number of concerns have been raised in the response. They are not all necessarily material considerations but that's ok. You are learning."*

Cllr Dilks says that he considers this comment to be patronising and disrespectful to the Clerk.

6.11 Cllr Dilks says Cllr Morgan's email states:

*"Please note it is not appropriate to state as a Town Council that the TC trust the SKDC planning officer's position".*

Cllr Dilks says he believes this statement by the Chair of the Council's Planning Committee questions the integrity and professionalism of the Council's planning officers, which is entirely unjustified and wholly inappropriate.

6.12 Cllr Dilks says Cllr Morgan's email states:

*"Unfortunately this brings into question other responses from the TC which have been entrusted to the clerk".*

Cllr Dilks says this comment is improperly questioning the professional integrity of the Clerk.

6.13 Cllr Dilks says that Cllr Morgan's email states:

*"Unfortunately the current statement undermines objections from elected representatives speaking at the SKDC Planning committee of which there will be at least 3 to my knowledge".*

Cllr Dilks says that this statement, together with the Cllr Morgan's opening comment (paragraph 6.9 above) raises questions of potential predetermination and bias by the Chair of the Council's Planning Committee (Cllr Morgan).

6.14 Cllr Dilks goes on to say that Cllr Morgan's reference to the Town Council's adoption of her suggestion as to how the Town Council should deal with planning matters, suggests that Cllr Morgan may have been involved for some time in the Town Council's response to planning applications submitted to the Council, whilst Chairing and presiding over decisions of the Council's Planning Committee.

6.15 Cllr Dilks states that so far as he is aware, Cllr Morgan has never declared her membership of the Town Council Planning Committee as an interest at meetings of the Council's Planning Committee where it has been considering applications involving the Town Council.

6.16 During our meeting of 19 January 2026, Cllr Dilks reiterated his concerns as to Cllr Morgan's email of 27 November 2025 to the Clerk. Cllr Dilks told me that in his view reasonable member of the public would perceive the email as Cllr Morgan, in her position as a member of the Council and Chair of the Council's Planning Committee, seeking to direct the Clerk to change the Town Council's response to a planning application to be determined by the Council's Planning Committee. Cllr Dilks told me in his view Cllr Morgan's actions are unacceptable and a clear conflict of interests, and that he

considers Cllr Morgan's email not only disrespectful to the Clerk but also suggestive of predetermination. Cllr Dilks told me that Cllr Morgan has not entered her membership of the Town Council and its planning committee in the Council's register of interests, and that no one at the Council knew of her roles at the Town Council. Cllr Dilks told me he is greatly concerned that Cllr Morgan may continue to chair the Council's Planning Committee which will determine the application in question, and the potential for her involvement to serve as grounds to challenge the Planning Committee's decision on the application.

### **Cllr Morgan**

- 6.17 In her email of 15 December 2025 to the Monitoring Officer by way of response to Cllr Baxter's complaint, (Complaint 1), Cllr Morgan explains the Town Council was newly established in May 2024 and that whilst the Town Council has a planning committee it does not meet formally despite the Town Council receiving planning applications for comment on an almost weekly basis. The Town Council deals with applications in the absence of a Committee meeting by the Clerk submitting a 'no comment' response on behalf of the Town Council, or where views have been expressed collating and submitting any comments received from members of the Town Council Planning Committee in the response. The Clerk is not authorised to make any decision of the Town Council in the response to a planning application in the absence of any such decision being made at a meeting of the Planning Committee.
- 6.18 In response to the planning application in question, the Clerk recorded 'no objection'. Cllr Morgan says this is would be a decision and implies that the application was considered at a meeting of the Town Council's Planning Committee when it had not been.
- 6.19 Cllr Morgans says she was elected by the Town Council to be the Vice-chair of the Town Council's Planning Committee in the Town Council's full knowledge that she was Chair of the Council's Planning Committee. Cllr Morgan says that in the absence of a monitoring officer at the time, she checked with the Council's lead planning officer who advised her that being Chair of the Council's Planning Committee and Vice-chair of the Town Council's Planning Committee would not be a problem provided she (Cllr Morgan) was satisfied that she would not be predetermined in considering planning applications, and that she appropriately declared interests. Cllr Morgan says this is the Council's standard protocol for any double-hatted member of the Council's Planning Committee. When she raised her double-hatted role at LALC Chair training on 30 September 2025, no issues were raised other than her being mindful of her positions when considering any application.
- 6.20 Cllr Morgan says that the Chair of the Town Council informed her that she and the Clerk were struggling to understand the material planning conditions and what could and could not be taken into account when determining planning applications. Cllr Morgan says this is entirely understandable given there is much to learn and the Chair of the Town Council and the Clerk had received only a brief training session. As such, Cllr Morgan agreed to

help them. Cllr Morgan says that Cllr Baxter's assertion that her comment to the Clerk "*..that's okay. You are learning*" is patronising is unfair – she (Cllr Morgan) was acknowledging a request for support and the work and support she had been providing to the clerk. Cllr Morgan says it was correct of her to say that their position could be undermined by the erroneous 'no objection' response submitted by the Town Council because it was wrong. The Town Council had not agreed that there was no objection. The application had been circulated to the Town Councillors and comments had been received.

- 6.21 Cllr Morgan says that when she suggested that the Town Council re-submits their response to this planning application that she used the word **if**. As such, Cllr Morgan says both Cllr Baxter and Cllr Dilks have ignored that in her email she is making a suggestion as to potential rewording **if** the Town Council was to resubmit its response to the application – she is neither directing the Clerk to resubmit the response, nor dictating the terms of the resubmitted response.
- 6.22 Cllr Morgan says that where planning applications concerning Grantham have come before the Council's Planning Committee, she has made appropriate declarations in line with advice from the Council's legal officers.
- 6.23 Cllr Morgan explained that when she realised she had sent the email of 27 November 2025 from her Council email address she was mortified as she had not realised the email had been sent with the automated signature. She explained since July 2025 she has had ongoing IT and communications issues with her Council email account. And as a result, she had been working between her laptop, smartphone, personal and council email accounts.
- 6.24 Cllr Morgan says that in drafting her email of 27 November 2025 to the Town Council clerk she swapped to her Council laptop and as such the email was erroneously sent from her Council email account rather than her Town Council or personal email account as she intended. Cllr Morgan says this error is unfortunate, regrettable and should not have occurred, and that she intended to email the Clerk in her capacity as a member of the Town Council, not as a member of the District Council / Chair of the Planning Committee.
- 6.25 Cllr Morgan says as a councillor she has a duty to challenge the accuracy of information, and being aware of an error in the Town Council's response to a planning application, emailed the Clerk to notify her of the error and suggest alternative wording to correct it. Cllr Morgan says that neither the Clerk nor the Chair of the Town Council have raised any concerns as to the content or tone of her email.
- 6.26 During our meeting of 16 January 2026, Cllr Morgan told me that she considered the Complaints to be vexatious and politically motivated, with her response to Complaint 1 and Complaint 2 being the same. Cllr Morgan told me the matter could have been rectified had it been brought to her attention immediately, but it had been unfairly escalated.

- 6.27 Cllr Morgan further explained to me how her email to the Clerk was inadvertently sent from her Council email account. Cllr Morgan told me that her Town Council email account had been accidentally deleted by officers of the Council's IT department in their efforts to sought out problems with her Council email account. As such, she had intended to send the email to the Clerk from her personal email account via her smartphone, but realising that the email would be lengthy and cumbersome to write on a smartphone, she decided to draft it on her laptop using her Council email account, send the email to her personal email account, remove the Council footer from the email, and then send it to the Clerk from her personal email account. Cllr Morgan told me that instead, she inadvertently sent the email to the Clerk direct from her Council laptop. As such, the email was erroneously sent from her Council email account, the footer of which included details as to her being Chair of the Council Planning Committee. Cllr Morgan has forwarded to me an email exchange between her and the Clerk as to her ongoing issues with her Town Council email account see appendix 3.
- 6.28 Cllr Morgan reiterated that her sending the email from her Council email account was an error resulting from ongoing problems she is having with Council and Town Council email accounts. Cllr Morgan reiterated that she intended to send the email in her capacity as a member of the Town Council to suggest how errors in the Town Council's response to the planning application could be corrected.
- 6.29 Cllr Morgan told me she accepts that if a member of the public had seen her email to the Clerk coming from her Council email account, as it did, the email could reasonably be perceived as the Chair of the Council's Planning Committee interfering with the Town Council's response to a planning application, and seeking to influence amendments to it.
- 6.30 Cllr Morgan strongly objects to the findings I made in the draft report. Although her comments have not changed my conclusions, I do understand that her position is that her only intent was to correct a misleading/ erroneous statement from the Town Council which she knew was incorrect and that this was not for her own benefit but to ensure the accuracy of information coming before the Planning Committee.

## **7. LOCAL GOVERNMENT ASSOCIATION GUIDANCE**

- 7.1 The Council has adopted the Model Code as its Code. As such the LGA Guidance on the Model Code (the "LGA Guidance") is relevant to the Code and complaints submitted under it. The following has been taken from the LGA Guidance but is not reproduced in full.

### **General Principles of Councillor Conduct**

- 7.2 The LGA Guidance states that the 'Seven Principles of Public Life' (also known as the 'Nolan Principles') outline the ethical standards those working in the public sector are expected to adhere to. The Nolan Principles apply to all public office holders including ministers, civil servants, councillors and local authority officers, as well as private and

voluntary organisations delivering services paid for by public funds. The Nolan Principles underpin the standards councillors should uphold and form the basis of a local authority's code of conduct, where the principles are translated into clear rules. While fundamental to a local authority code of conduct, the Nolan Principles are not part of the code, and should be used for guidance and interpretation only.

## Respect

- 7.3 The LGA Guidance states that as an elected representative of the public it is important for councillors to act in a respectful way. Respect means politeness, courtesy and civility in behaviour, speech and in the written words.
- 7.4 Disrespectful behaviour can take many different forms ranging from acts of abuse and disruptive or bad behaviour to insidious actions such as bullying and demeaning treatment of others. It is subjective and difficult to define but may include attempts to shame or humiliate others in public, fault-finding, inappropriate sarcasm and behaviour which would discourage others from interacting with the perpetrator in the expectation that to do so would be an unpleasant or highly uncomfortable experience. Disrespectful behaviour can be harmful as it can lower the public's expectations and confidence in a councillor and their local authority.
- 7.5 The circumstances in which the behaviour occurs is relevant in assessing whether the behaviour is disrespectful. The circumstances include the place where the behaviour occurs together with the characters, behaviours and relationship of the people involved.
- 7.6 The requirement to treat others with respect must be within the context of the right to freedom of expression in accordance with Article 10 of the European Convention on Human Rights given effect under the Human Rights Act 1998.

## Impartiality of Officers

- 7.7 The LGA Guidance states that both councillors and officers of a local authority are public servants and are indispensable to one another: whilst councillors provide a democratic mandate to a local authority and are responsible to the electorate whom they represent, officers deliver the policy framework agreed by councillors, and provide the professional advice, managerial expertise and information councillors need to make decisions.
- 7.8 The LGA Guidance further states that officers are required to be politically neutral and owe their duties to the local authority as a whole. As such, councillors must respect the impartiality and professional expertise of officers, and accept that this means officers may sometimes give advice which councillors do not want to hear, or which does not suit their political views, which they must be allowed to do without fear of recrimination to allow for good decision-making. Councillors must not ask officers to undertake work of a party-political nature or compromise their position with other councillors or officers, and must not seek to influence them improperly or put undue pressure on them.

## Disrepute

- 7.9 The LGA Guidance states that in general terms, disrepute can be defined as a lack of good reputation or respectability. The LGA Guidance states that councillors should be aware that their actions might have an adverse impact on their role, other councillors and / or the local authority, and may lower the public's confidence in a councillor's ability to discharge their functions as a councillor, or the local authority's ability to discharge its functions as a local authority. A councillor's behaviour will bring their role into disrepute if their conduct could reasonably be regarded as either 1) reducing the public's confidence in them being able to fulfil their role, or 2) adversely affecting the reputation of the authority's councillors in being able to fulfil their role.
- 7.10 Conduct by a councillor which would reasonably be regarded in reducing public confidence in their local authority being able to fulfil its functions and duties, will bring the authority to disrepute. The misconduct needs to be sufficient to damage the reputation of the role of a councillor or the local authority, as opposed simply to damaging the reputation of the individual concerned.
- 7.11 The LGA Guidance states that a councillor circulating highly inappropriate, vexatious or malicious emails to constituents, making demonstrably dishonest posts about their local authority on social media, or using abusive or threatening behaviour as examples of conduct which may bring their role as a councillor into disrepute.
- 7.12 The LGA Guidance states that a councillor making grossly unfair or patently untrue or unreasonable criticism of their local authority in a public arena as examples of conduct which may bring their local authority into disrepute.

## Misuse of Position

- 7.13 The LGA Guidance states that councillors are provided with opportunities, responsibilities and privileges, and make decisions which will impact others, however, councillors must not take advantage of such opportunities to further their own or others' private interests or to unfairly disadvantage anyone. Councillors should not use, or attempt to use, their position for their own or anyone else's personal gain or loss. The misuse of position provisions also apply where an attempt to secure an advantage or disadvantage has failed.

## Interests

- 7.14 In accordance with section 29 of the Localism Act 2011 the Council has determined that the register of interests disclosed by councillors should include other registerable interests which are listed in Table 2 found in Appendix B of the Code.
- 7.15 The LGA Guidance states that councillors should register these interests so that the public, local authority employees and fellow councillors know which of a councillor's interests may give rise to a conflict of interests, and that the register also protects councillors by demonstrating their openness and willingness to be held to account.

Councillors should register their other registerable interests within 28 days of becoming a member, or being re-elected or re-appointed to office.

### Other Registerable Interests

7.16 Other Registerable Interests (“ORIs”) the ORIs which should be registered and declared are set out in Table 2 of Appendix A of the Code as;

7.16.1 any unpaid directorships;

7.16.2 any body of which you are a member or in a position of general control or management to which you are nominated or appointed by your authority;

7.16.3 any body:

(a) exercising functions of a public nature;

(b) directed to charitable purposes or

(c) one of whose principle purposes includes the influence of public opinion or policy (including any political party of trade union)

(d) of which you are a member or in a position of general control or management.

7.17 Where a matter arises at a meeting which directly relates to the financial interest or well-being of an ORI, a councillor:

7.17.1 must disclose the interest and may only speak and / or vote on the matter if other members of the public are also allowed to speak on it, and otherwise,

7.17.2 must not remain in the meeting room unless granted a dispensation.

7.18 An ORI which is a ‘sensitive interest’ does not have to be registered and details of it are not required to be disclosed. The monitoring officer of a local authority must agree that an ORI is ‘sensitive’ (i.e., that disclosure of the interest may lead to the councillor or a person connected with them being subject to violence or intimidation).

## 8. FINDINGS

### Application of the Code

8.1 The Code applies in the circumstances set out under section 5 above, including:

- when you misuse your position as a councillor;
- when 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.

8.2 In my view, a reasonable member of the public’s knowledge of the all the facts would include a knowledge of the problems with Cllr Morgan’s Town Council email account, the reason why she sent her email of 27 November 2025 to the Clerk, and that the email was according to Cllr Morgan not meant to have been sent from her District Council

email account. However, I am further of the view that in the circumstances a reasonable member of the public with knowledge of all the facts would nonetheless be given the impression that in sending the email from her Council email account, stating as Cllr Morgan does in the email that she is preparing for the District Council's Planning Committee meeting that Cllr Morgan was acting in her capacity as a member of the Council and not Grantham Town Council.

- 8.3 For the above reasons, I find there is sufficient evidence upon which a finding may be made that in the circumstances of Complaint 1 and Complaint 2, the Code applied to Cllr Morgan.

## **Complaint 1 and Complaint 2**

### **Respect**

- 8.4 In consideration of the LGA Guidance set out above at paragraphs 7.3 – 7.6, in my view Cllr Morgan's comments in her email to the Clerk, including particularly the comment "*You are learning...*" is not impolite, discourteous, uncivil or offensive, and in sending the email, nor was Cllr Morgan bullying, demeaning, shaming, or humiliating the Clerk. There has not been a complaint received from the Clerk and given the relationship Cllr Morgan has explained and how she is assisting her, I find there is insufficient evidence upon which a finding may be made that in either sending the email, or drafting it in the terms which she did, Cllr Morgan failed to treat the Clerk with respect.

### **Impartiality of Officers (of the Council)**

- 8.5 The Code requires that members of the Council do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the Council. Given the finding that Cllr Morgan is acting in her capacity as a District Councillor. The Town Council clerk is not an officer of the District Council, and does not work for, or on behalf of, the District Council.
- 8.6 I therefore find there is no basis upon which a finding can be made that in sending her email of 27 November 2025 to the Clerk of Grantham Town Council, Cllr Morgan compromised or attempted to compromise the impartiality of anyone who works for, or on behalf of, the District Council which is the capacity in which she was acting when sending the email. The part of the Code which would apply to these sets of facts where the officer is working for another authority is misuse of position which is considered below.

### **Disrepute**

- 8.7 In my view, on the face of it Cllr Morgan's email of 27 November 2025 to the Clerk could reasonably be perceived by a member of the public as a member of the Council and the Chair of its Planning Committee (Cllr Morgan) seeking to bring pressure to bear upon the Town Council to re-submit its response a planning application to be determined by

the Council's Planning Committee, and to suggest revised terms of the response so it aligns with objections to the application which Cllr Morgan knows she and others will make.

- 8.8 Whilst there is no evidence that Cllr Morgan's email to the Clerk was seen by any member of the public, in consideration of the LGA Guidance set out at paragraphs 7.9 – 7.12 above, given the perception which might reasonably be formed from the content of the email and it being sent from Cllr Morgan's District Council email account, the footer of which identified her as a member of the Council and the Chair of the Council's Planning Committee, in my view Cllr Morgan's actions could reasonably be regarded as reducing the public's confidence in her being able to fulfil her role as member of the Council and Chair of the Planning Committee, and could also be reasonably regarded as reducing public confidence in the Council being able to fulfil its function as the local planning authority, in both instances, by reducing the public's confidence in the transparent, objective and impartial determination of at least the planning application in question. If the email had been sent in her role as a Town Council this would not in my view have been cause for complaint. It is the fact it is sent in her role as a district councillor and chair of the Planning Committee that causes this issue.
- 8.9 I find that there is sufficient evidence upon which a finding may be made that Cllr Morgan has brought her role as a member of the Council and Chair of its Planning Committee into disrepute, and that there is also sufficient evidence upon which a finding may be made that Cllr Morgan has brought the Council into disrepute.

### **Misuse of Position**

- 8.10 For the reasons set out above in paragraphs 8.7 and 8.9 as to the perception which might reasonably be formed given the email account from which Cllr Morgan sent her email to the Clerk, and the content of the email, in my view Cllr Morgan's actions might also be reasonably perceived as her attempting to improperly use her position as a district councillor and Chair of the Council's Planning Committee to influence the outcome of a planning application to the advantage of those who object to the application, and to the disadvantage of the applicant, which in both cases is likely to involve a degree of gain or loss, financial or otherwise, for those who will be affected to a varying extent by the determination of the planning application one way or another.
- 8.11 I find there is sufficient evidence upon which a finding may be made that Cllr Morgan has attempted to use her position improperly to the advantage and disadvantage of others.

### **Declaration / Registration of Interests**

- 8.12 No evidence has been adduced as to the specific meetings where Cllr Morgan has failed to declare when required to do so her membership of the Town Council or position as Vice-chair of the Town Council Planning Committee, at a meeting of the Council's Planning Committee. It is noted however, that as of 21 January 2026, see appendix 4

Cllr Morgan has not entered her membership of the Town Council or position as Vice-chair of the Town Council in the Council's register of members' interests as an Other Registerable Interest in Table 2 under the description - any body:exercising functions of a public nature as she should have done in accordance with the Code adopted by the Council.

## **9. THE CODE AND CULPABILITY**

- 9.1 The Code is concerned only with whether or not one or more of its obligations has been breached. It is not concerned with whether a breach was intended or unintended, deliberate, accidental or a consequence of ignorance, confusion, misunderstanding or mistake, prevailing circumstances, extraneous influences or third party actions. As such, underlying reasons and a councillor's state of mind do not fall to be considered in determining whether, on the balance of probabilities, there is sufficient evidence upon which a finding may be made that the Code has been breached in a given case.
- 9.2 Where a finding has been made that the Code has been breached, factors such as those detailed in paragraph 9.1 above, do however go to any sanction which might be imposed, and the consideration of aggravating or mitigating factors, and a councillor's culpability.
- 9.3 In the present matter, I am of the view that whilst Cllr Morgan's explanation as to her actions and intentions in sending the email does not negate the evidence which I have found on its face to be sufficient for a finding to be made that she breached the Code, her mitigation may be taken into account by the Monitoring Officer when determining this complaint.

## **10. CONCLUSION**

### **Complaint 1 and Complaint 2**

- 10.1 I find there is sufficient evidence upon which a finding may be made that in the circumstances of the Complaint 1 and Complaint 2, the Code applied to Cllr Morgan.
- 10.2 In sending her email of 27 November 2025 to the Clerk of the Town Council, and drafting the email as she did, I find there is insufficient evidence upon which a finding may be made that Cllr Morgan breached the following elements of the Code:
- 10.2.1 Paragraph 1.1 I 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;
- 10.2.2 Paragraph 3.1: I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority.

10.3 But in sending her email of 27 November 2025 to the Clerk of the Town Council, and drafting the email as she did, I find there is sufficient evidence upon which a finding may be made that Cllr Morgan breached the following elements of the Code:

10.3.1 Paragraph 5.1: I do not bring my role or local authority into disrepute; and,

10.3.2 Paragraph 6.1: I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.

**Claire Ward**

**Partner**

**Anthony Collins Solicitors LLP**

**Ref. 030278.0006**

### **Appendices**

Appendix 1 Complaint 1 and Complaint 2

Appendix 2 Cllr Morgan's Initial Response

Appendix 3 Cllr Morgan's emails re IT problems

Appendix 4 Cllr Morgans Register of Interest

Appendix 5 Cllr Morgans comments on the draft report

Appendix 6 Investigation Chronology

## **Appendix 1 Complaint 1 and Complaint 2**

**From:** "Cllr Ashley Baxter" <ashley.baxter@southkesteven.gov.uk>  
**Sent:** Friday, December 5, 2025 11:56 AM  
**To:** "Rachel McKoy" <Rachel.McKoy@southkesteven.gov.uk>  
**Subject:** Code of Conduct: Cllr Morgan

Dear Rachel McKoy,

In your capacity as SKDC's Interim Monitoring Officer, I would like you to investigate whether or not Cllr Charmaine Morgan has breached the Code of Conduct for South Kesteven District Council and/or Grantham Town Council.

I understand that a Code of Conduct investigation can only take place in response to a formal complaint. Therefore, please regard this e-mail as a formal Code of Conduct complaint against Cllr Charmaine Morgan.

The complaint relates to Cllr Morgan's recent behaviour as:

- a District Councillor
- a Town Councillor
- Chair of the SKDC Planning Committee
- Vice-Chair of GTC Planning Sub-Committee

I suspect that Cllr Morgan has breached the following elements of the Code of Conduct:

- 3.1 *I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority.*
- 5.1 *I do not bring my role or local authority into disrepute.*
- 6.1 *I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.*

This complaint relates to the e-mail chain below.

The original e-mail was sent to the Grantham Town Clerk from Cllr Morgan's South Kesteven e-mail account and the valediction makes it clear to the reader that it is sent from Cllr Morgan in her capacity as a District Councillor and Chair of the SKDC Planning Committee. In the body of the e-mail, Cllr Morgan tells the Town Clerk that she (the Clerk) has not only acted inappropriately but also that she has undermined elected representatives likely to speak at the SKDC Planning Committee. Cllr Morgan goes on to suggest (or more accurately 'instruct') the Clerk to revise the Town Council's submission to reflect Cllr Morgan's preferred narrative. The tone of the e-mail is sometimes patronising (eg. "You're learning").

The covering e-mail from Cllr Harrison explains in more detail some of the reasons why Cllr Morgan's e-mail is problematic.

It is my understanding that Cllr Morgan has also lobbied the Vice-Chair of the SKDC Planning Committee regarding this particular planning application. If this is the case, then I would suggest it was a further breach of the Code of Conduct.

Thank you for your attention in this matter.

**Ashley**

Cllr Ashley Baxter  
Leader of South Kesteven District Council

  
07799 077090

---

**From:** Cllr Tim Harrison <[Tim.Harrison@southkesteven.gov.uk](mailto:Tim.Harrison@southkesteven.gov.uk)>  
**Sent:** 27 November 2025 13:14  
**To:** Cllr Ashley Baxter <[ashley.baxter@southkesteven.gov.uk](mailto:ashley.baxter@southkesteven.gov.uk)>; Cllr Paul Stokes <[Paul.Stokes@southkesteven.gov.uk](mailto:Paul.Stokes@southkesteven.gov.uk)>; Karen Bradford <[Karen.Bradford@southkesteven.gov.uk](mailto:Karen.Bradford@southkesteven.gov.uk)>; Cllr Steve Cunnington <[Steve.Cunnington@southkesteven.gov.uk](mailto:Steve.Cunnington@southkesteven.gov.uk)>; Cllr Phil Dilks <[phil.dilks@southkesteven.gov.uk](mailto:phil.dilks@southkesteven.gov.uk)>  
**Subject:** Fw: Planning application - S25/ 1656 HMO Dudley Road

Dear Steve,

Thanks for alerting me to a potential governance issue. There are a number of problems with this in my opinion, I have copied in the Leader, Deputy Leader, Cabinet Member for Planning and the CEO.

A District Councillor has directly attempted to influence a Town Council Officer submission.

Charmaine — acting in her SKDC capacity, even referring to preparing for SKDC Planning Committee — has written to the Town Clerk and effectively:

Challenged the Town Council's formal response to a planning application. Directed what the wording *should* be. Told the Clerk what is and is not "appropriate" for a Town Council to say. Suggested a replacement form of wording. Questioned the validity of previous Town Council submissions. Implied procedural impropriety by the clerk ("brings into question other responses... entrusted to the Clerk"). This is not appropriate. District councillors do not instruct Town Council Officers. Full stop. Clerks answer to the Town Council as a body, not individual councillors — especially not councillors acting in a different authority. It crosses governance boundaries and creates the appearance (even if unintentionally) of using SKDC authority to pressure a lower-tier authority.

She is also a Town Councillor — but she was writing as a District Councillor. This is where it becomes a conflict-of-capacity issue. The email is clearly positioned as: Preparing for the SKDC planning meeting. Referring to her SKDC call-in. Referencing SKDC procedure. Attempting to align the Town Council's submission with her SKDC stance. That means she is wearing the SKDC hat, not the Town Council hat. If she wished to challenge the Town Council submission as a Town Councillor, she should have: raised it internally through GTC processes. Contacted you as the Chair of GTC Planning and asked for an item on the GTC agenda. NOT emailed the Clerk as an external SKDC member. Because she used the SKDC email, copied SKDC members, and referenced SKDC committee work, she has placed herself *outside* GTC internal governance. This is a breach of the separation of roles expected between two authorities. It is improper for a councillor to challenge or rewrite an already-published council response. Once GTC has submitted a consultation response, there are only lawful ways to alter it, which are: A properly convened meeting of the relevant committee/body. A proper resolution. A minuted decision directing the clerk to submit revised wording

Individual members, even Town Councillors, cannot privately instruct or pressure the Clerk to alter an already-issued statutory consultation response. Let alone a District Councillor. It creates a perception of trying to influence the Town Council to support her SKDC case. Her email explicitly states:

"The current statement undermines objections from elected representatives speaking at SKDC Planning Committee..."

That is the clearest possible evidence that, she is trying to align the Town Council's position with the argument she will present at the District Planning Committee. She is concerned that a "No objection" from GTC weakens her political position, she is therefore attempting to engineer a retrospective shift in GTC's formal position, this is dangerous territory. In my opinion it raises apparent bias, predetermination, and misuse of position concerns. The specific governance breaches that may apply include Town Council Governance Risks, Undermining the Clerk's independence. Bypassing proper procedures for amending responses. External interference in town-level decision-making. Possible breach of GTC Standing Orders on communication, authority and decision-making. Possible Code of Conduct issues (respect for officers, misuse of position, bringing the council into disrepute). But also include District Council Governance Risks, such as predetermination / appearance of bias. Attempting to influence another authority's statutory consultee. Using a District role to affect another authority's decision-making. Potential Code of Conduct breach (attempting to secure advantage or influence a process improperly).

I will await advice from the Ashley, Paul, Phil and the Chief Exec before possibly taking this further. Those mentioned can see the email trail below.

Kind regards

**Tim Harrison Councillor for Grantham St. Wulfram's Ward**

---

**From:** Cllr Steve Cunnington <[Steve.Cunnington@southkesteven.gov.uk](mailto:Steve.Cunnington@southkesteven.gov.uk)>

**Sent:** Thursday, November 27, 2025 10:10 am

**To:** Cllr Tim Harrison <[Tim.Harrison@southkesteven.gov.uk](mailto:Tim.Harrison@southkesteven.gov.uk)>

**Subject:** Fw: Planning application - S25/ 1656 HMO Dudley Road

FYI

Steven  
**Steven Cunnington**  
**District Councillor**

---

**From:** Admin <[admin@granthamtowncouncil.org](mailto:admin@granthamtowncouncil.org)>  
**Sent:** Thursday, November 27, 2025 9:43 am  
**To:** Cllr Charmaine Morgan <[charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)>; Marie Reid <[marie.reid@granthamtowncouncil.org](mailto:marie.reid@granthamtowncouncil.org)>  
**Cc:** Cllr Steve Cunnington <[Steve.Cunnington@southkesteven.gov.uk](mailto:Steve.Cunnington@southkesteven.gov.uk)>  
**Subject:** Re: Planning application - S25/ 1656 HMO Dudley Road

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning Charmaine

Thank you for your email.

We can only submit comments that have been received from Cllrs. Now that we have received your email in your relation to this planning matter, we can add your suggestion.

Kind regards

**Chloe**

Chloe Goswell - Town Clerk  
Grantham Town Council  
My usual working days are Tuesday to Friday, 9:30am till 3:30pm.  
Meetings in The Parlour are by appointment only.

T: 01476 847817  
E: [admin@granthamtowncouncil.org](mailto:admin@granthamtowncouncil.org) / [clerk@granthamtowncouncil.org](mailto:clerk@granthamtowncouncil.org)  
W: [granthamtowncouncil.org](http://granthamtowncouncil.org)

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**From:** Cllr Charmaine Morgan <[charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)>  
**Sent:** 27 November 2025 7:50 AM  
**To:** Marie Reid <[marie.reid@granthamtowncouncil.org](mailto:marie.reid@granthamtowncouncil.org)>; Admin <[admin@granthamtowncouncil.org](mailto:admin@granthamtowncouncil.org)>  
**Cc:** Cllr Steve Cunnington <[Steve.Cunnington@southkesteven.gov.uk](mailto:Steve.Cunnington@southkesteven.gov.uk)>;  
[REDACTED]  
**Subject:** Planning application - S25/ 1656 HMO Dudley Road

Dear Marie and Chloe

Whilst preparing for the Dudley Road HMO SKDC Planning Committee I have been reviewing all Comments.

Unfortunately, I note the response of the Grantham Town Council to the planning application for the conversion of the care home to an HMO at 6 Dudley Road does not reflect the concerns raised within the submission itself or the concerns raised at our recent Planning Meeting when we discussed the impact of HMOs in Grantham and St Vincents Ward in particular.

There is no mention of the site being in a Conservation Area and next to another, which is something that should be known by GTC and is a material consideration.

Please note it is not appropriate to state as a Town Council that the TC trust the SKDC planning officer's position. The TC is an elected body with the role of representing our Community. The TC will not always give the same weight to material planning considerations as SKDC Planning Officers.

Unfortunately the current statement undermines objections from elected representatives speaking at the SKDC 20 Planning committee of which there will be at least 3 to my knowledge.

A number of concerns have been raised in the response. They are not all necessarily material considerations but that's ok. You are learning. i.e. laundry facilities are not required on site in HMOs shocking as this may be in my view.

The number of rooms,  
number of occupants,  
impact on amenity of neighbouring residents,  
impact on Conservation areas (the site falls inside St Annes Conservation Area and on the edge of Grantham Town Centre Conservation Area)  
size of rooms (which could impact on potential occupancy numbers)  
layout  
storage of waste are material considerations  
boundary treatments,  
preservation of any trees onsite etc.  
privacy and overlooking  
parking – can be depending on the design and location

Of far greater concern is the statement that the TC has 'No Objections'.

For the Town Council to state 'No Objections' carries weight in Planning Terms.  
No meeting of the TC took place to form such a decision.

If the TC is to make a Decision it should hold a meeting of the Planning Committee to formerly discuss and vote on the application.  
This is standard practice across Parish and Town Councils.

There are over 30 members of the public objecting to this application now.

Suggestion: There is time to reword the response now that SKDC have provided more time for Public comments and now that the TC Planning Committee have had an opportunity to raise concerns regarding the number of HMOs in our Town and have submitted questions to SKDC.

NB I believe I copied you into my Call In paper for this application to come to SKDC committee so you had my material planning considerations which could have been included in your submission. If you did not receive this please let me know. I will forward it to you.

I suggest that, if resubmitted, at the very least the paragraph  
*We have no objections to the proposal and trust the planning officer's expertise in making an appropriate decision however the following concerns were raised:*

Is replaced with

*The following concerns were raised:*

The publicly available response is below:

## **Parish Council**

*Comment Date: Mon 03 Nov 2025*

*We have no objections to the proposal and trust the planning officer's expertise in making an appropriate decision however the following concerns were raised:*

*-The property had a previous maximum capacity of 17 as a nursing home and was marketed and sold as a 14 bedroom property. The proposed number of occupants exceeds this amount.*

*- Will there be laundry/washing facilities in each property as only one laundry facility for a 24 bed property is not enough.*

*- There is no communal living space other than the kitchens and the bathroom and toilet facilities seem slim*

*- There is limited parking at the rear of the property and potentially too few for 24 vehicles.*

- Disturbance to local residents is likely to occur when changing from a minimal disturbance nursing home to two 12 bed HMO's

- Ensuring the character and features of the property are in keeping with the local area

Unfortunately this response brings into question other responses from the TC which have been entrusted to the Clerk.

It was my understanding, in the absence of regular Planning Committee meetings, that comments are only collated and responses would either be 'No Comment' or a collation of the comments raised. This was my suggestion at a very early on in the formation of the Town Council at Full Council to avoid regular Planning Committee meetings and to ensure Decisions were not left to TC officers which would not be appropriate. It was agreed at the time.

This also avoids members having to check every response to every application. Grantham has far more applications coming through than any other part of the District to my knowledge.

The implementation of how we are responding to applications may need a review given this response unfortunately.

Kind regards

Charmaine

**South Kesteven District Councillor Charmaine Morgan  
(Democratic Independent) Grantham St Vincents Ward**

Chair SKDC Planning

Member SKDC Housing OSC

SKDC Member of LCC Health Scrutiny Committee

**Grantham Town Councillor**

Contact: [Charmaine.morgan@granthamtowncouncil.org](mailto:Charmaine.morgan@granthamtowncouncil.org)

**Chair SOS Grantham Hospital**

**Mob: 07398 156 296**

**Email: [charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)**

**c/o The Picture House,  
St Catherines Road  
Grantham, Lincolnshire, NG31 6TT**

**[www.southkesteven.gov.uk](http://www.southkesteven.gov.uk)**



**SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL**

The information contained in this e-mail along with any attachments may be confidential, legally privileged or otherwise protected from disclosure. It is intended for the named individual(s) or entity who is/are the only authorised recipient(s). If this message has reached you in error please notify the sender immediately and delete it without review. Email is not secure and may contain viruses. We make every effort to ensure email is sent without viruses, but cannot guarantee this and recommends recipients take appropriate precautions. We may monitor email traffic data and content in accordance with our policies and English law.

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To provide you with our services we will need to record personal information, such as your e-mail address. This information will be kept securely and only accessed by approved staff. If you would like more details about how we protect personal information, then please contact our Data Protection Officer or visit our privacy notice page - [Privacy notice | South Kesteven District Council](#).

To Rachel McKay  
Interim Monitoring Officer  
SKDC

CODE OF CONDUCT COMPLAINT:

Dear Rachel McKay

It is with regret that for the first time in some 30 years serving as a local councillor, I have to register a formal complaint against a fellow councillor.

My complaint is that Councillor Charmaine Morgan, whilst acting in her capacity as Chairman of the Planning Committee for South Kesteven District Council failed to demonstrate the high standards of probity expected of elected members.

I believe the email (Annex 1 below) sent from Councillor Morgan's SKDC email address to the clerk of Grantham Town Council on 27<sup>th</sup> November 2025 is a clear and improper attempt to use her position as Chairman of SKDC Planning Committee to influence or lobby an officer of another public body and apply pressure to change the previously published response by a public body to a planning application.

Specifically, I believe the email demonstrates unacceptable conduct including the following:

- Numerous significant breaches (listed in Annexe 2 below) of the SKDC Code of Conduct, the SKDC Planning Code of Good Practice and the Nolan Principles of Public Life.
- Serious disregard for the most basic planning training as required and undertaken annually by all members of the planning committee including the Chairman.
- Clear and undeclared conflicts of interest in serving as both Chairman of SKDC's Planning Committee at the same time as being a member of Grantham Town Council Planning Committee.
- Poor judgement.
- Lack of integrity.
- Risk of legal challenge to any future determination on the planning application referred to in the email – and possibly others - including reputational damage to the Council, a reduction in public trust particularly in planning matters, and even potential costly Judicial Review against SKDC.
- Total absence of the leadership and example reasonably expected to be shown by any member, but in particular by a member of many years experience and knowledge and holding high office as the Chairman of the Planning Committee.

It has always been my clear understanding - drummed home in every mandatory annual planning training session - that members of the District Council Planning Committee should not be members of a town or parish council planning committee nor seek to influence how a parish or town council responds to planning applications.

However, since a copy of Councillor Morgan's email has been passed to me, I have checked the Grantham Town Council website and was surprised and disappointed to see that as of today, she is listed as a member of the Town Council Planning Committee. In my view this presents an unacceptable conflict of interest which I note does not appear in Councillor Morgan's published register of interests on the SKDC website.

In the opening line of her email to the Town Clerk, Councillor Morgan sets the context of her remarks by stating:

*"Whilst preparing for the Dudley Road HMO SKDC Planning Committee I have been reviewing all Comments..."*

Cllr Morgan goes on to challenge the Town Council's previously published response to the application. She warns that a 'No objection' response 'carries weight' she unreasonably directs the Clerk how she wishes the Town Council submission to be changed from 'No objection' to 'Concerns raised'...

I believe that any reasonable member of the public reading Councillor Morgan's email would conclude that the intention of her email was to use her perceived authority as Chairman of the SKDC Planning Committee to instruct the Clerk of a lower-tier public authority to change the submission.

For instance, in responding to the Town Clerk's published response, Councillor Morgan writes:

*"A number of concerns have been raised in the response. They are not all necessarily material considerations but that's ok. You are learning."*

I believe this demonstrates an unacceptable patronising attitude by the Chairman of SKDC's Chairman of Planning Committee and lack of due respect that public officers are entitled to expect from any elected member.

Councillor Morgan then instructs the Town Clerk:

*"Please note it is not appropriate to state as a Town Council that the TC trust the SKDC planning officer's position."*

I believe this statement by the Chairman of SKDC Committee questions the integrity and professionalism SKDC planning officers and is wholly unjustified and entirely inappropriate.

Ironically, Councillor Morgan goes on to improperly question the professional integrity of the Town Clerk stating:

*"Unfortunately brings into question other responses from the TC which have been entrusted to the Clerk."*

Councillor Morgan also tells the Town Clerk that the original submission by the Town Council to SKDC:

*"Unfortunately the current statement undermines objections from elected representatives speaking at the SKDC Planning committee of which there will be at least 3 to my knowledge."*

I believe this statement - together with the opening line in which Councillor Morgan states she is 'reviewing all comments' as she prepares for this application to come to SKDC Planning Committee = raises questions of potential predetermination and bias by the Chairman of SKDC Planning Committee.

I note that Councillor Morgan also refers in her email to her suggestion which she says was adopted by the Town Council regarding how planning matters should be handled.

This unfortunately suggests Councillor Morgan may have been involved in Town Council responses to planning applications for some considerable period whilst presiding over determinations by SKDC Planning Committee. As far as I am aware, Cllr Morgan has never declared her interest as a member of Grantham Town Council Planning Committee when Grantham applications have been considered by the Committee

Given all the circumstances, I believe that the email written by the Chairman of SKDC Planning Committee demonstrates flagrant, numerous and significant disregard for long adopted planning protocols.

Sadly, in my role as Cabinet Member for Planning and with regret, I have to conclude that Councillor Morgan is not a fit and proper person to be a member of the SKDC Planning Committee, nor to have any involvement involved with the South Kesteven District Council quasi-legal process of determining planning applications.

In the interests of integrity, openness and accountability and protecting the reputation and public trust in SKDC, I would be grateful if you would confirm that you will be thoroughly investigating these disturbing matters.

Yours most sincerely

Phil Dilks  
Cabinet Member for Planning  
SKDC

Annexe 1 and 2 follow...

---

## ANNEXE 1

### Email from Councillor Charmaine Morgan to Grantham Town Council Clerk.

**From:** Cllr Charmaine Morgan <[charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)>

**Sent:** 27 November 2025 7:50 AM

**To:** Marie Reid <[marie.reid@granthamtowncouncil.org](mailto:marie.reid@granthamtowncouncil.org)>; Admin <[admin@granthamtowncouncil.org](mailto:admin@granthamtowncouncil.org)>

**Cc:** Cllr Steve Cunnington <[Steve.Cunnington@southkesteven.gov.uk](mailto:Steve.Cunnington@southkesteven.gov.uk)>; [REDACTED]

**Subject:** Planning application - S25/ 1656 HMO Dudley Road

Dear Marie and Chloe

Whilst preparing for the Dudley Road HMO SKDC Planning Committee I have been reviewing all Comments.

Unfortunately, I note the response of the Grantham Town Council to the planning application for the conversion of the care home to an HMO at 6 Dudley Road does not reflect the concerns raised within the submission itself or the concerns raised at our recent Planning Meeting when we discussed the impact of HMOs in Grantham and St Vincents Ward in particular.

There is no mention of the site being in a Conservation Area and next to another, which is something that should be known by GTC and is a material consideration.

Please note it is not appropriate to state as a Town Council that the TC trust the SKDC planning officer's position.

The TC is an elected body with the role of representing our Community. The TC will not always give the same weight to material planning considerations as SKDC Planning Officers.

Unfortunately the current statement undermines objections from elected representatives speaking at the SKDC Planning committee of which there will be at least 3 to my knowledge.

A number of concerns have been raised in the response.

They are not all necessarily material considerations but that's ok. You are learning. i.e. laundry facilities are not required on site in HMOs shocking as this may be in my view.

The number of rooms,  
number of occupants,  
impact on amenity of neighbouring residents,  
impact on Conservation areas (the site falls inside St Annes Conservation Area and on the edge of Grantham Town Centre Conservation Area)  
size of rooms (which could impact on potential occupancy numbers)  
layout  
storage of waste are material considerations  
boundary treatments,

preservation of any trees onsite etc.  
privacy and overlooking  
parking – can be depending on the design and location

Of far greater concern is the statement that the TC has ‘No Objections’.

For the Town Council to state ‘No Objections’ carries weight in Planning Terms.  
No meeting of the TC took place to form such a decision.

If the TC is to make a Decision it should hold a meeting of the Planning Committee to formerly discuss and vote on the application.  
This is standard practice across Parish and Town Councils.

There are over 30 members of the public objecting to this application now.

Suggestion: There is time to reword the response now that SKDC have provided more time for Public comments and now that the TC Planning Committee have had an opportunity to raise concerns regarding the number of HMOs in our Town and have submitted questions to SKDC.

NB I believe I copied you into my Call In paper for this application to come to SKDC committee so you had my material planning considerations which could have been included in your submission. If you did not receive this please let me know. I will forward it to you.

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*We have no objections to the proposal and trust the planning officer's expertise in making an appropriate decision however the following concerns were raised:*

Is replaced with

*The following concerns were raised:*

The publicly available response is below:

## **Parish Council**

*Comment Date: Mon 03 Nov 2025*

*We have no objections to the proposal and trust the planning officer's expertise in making an appropriate decision however the following concerns were raised:*

*-The property had a previous maximum capacity of 17 as a nursing home and was marketed and sold as a 14 bedroom property. The proposed number of occupants exceeds this amount.*

*- Will there be laundry/washing facilities in each property as only one laundry facility for a 24 bed property is not enough.*

*- There is no communal living space other than the kitchens and the bathroom and toilet facilities seem slim*

*- There is limited parking at the rear of the property and potentially too few for 24*

*vehicles.*

*- Disturbance to local residents is likely to occur when changing from a minimal disturbance nursing home to two 12 bed HMO's*

*- Ensuring the character and features of the property are in keeping with the local area*

Unfortunately this response brings into question other responses from the TC which have been entrusted to the Clerk.

It was my understanding, in the absence of regular Planning Committee meetings, that comments are only collated and responses would either be 'No Comment' or a collation of the comments raised. This was my suggestion at a very early on in the formation of the Town Council at Full Council to avoid regular Planning Committee meetings and to ensure Decisions were not left to TC officers which would not be appropriate. It was agreed at the time. This also avoids members having to check every response to every application. Grantham has far more applications coming through than any other part of the District to my knowledge.

The implementation of how we are responding to applications may need a review given this response unfortunately.

Kind regards

*Charmaine*

**South Kesteven District Councillor Charmaine Morgan  
(Democratic Independent) Grantham St Vincents Ward**

*Chair SKDC Planning*

*Member SKDC Housing OSC*

*SKDC Member of LCC Health Scrutiny Committee*

**Grantham Town Councillor**

Contact: [Charmaine.morgan@granthamtowncouncil.org](mailto:Charmaine.morgan@granthamtowncouncil.org)

**Chair SOS Grantham Hospital**

**Mob: 07398 156 296**

**Email: [charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)**

**c/o The Picture House,**

**St Catherines Road**

**Grantham, Lincolnshire, NG31 6TT**

**[www.southkesteven.gov.uk](http://www.southkesteven.gov.uk)**



**SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL**

## ANNEXE 2

### Specific points of Councillor Codes of Conduct, Nolan Principles and Planning Protocols which may have been breached by Councillor Morgan.

Extracts from SKDC's Constitution:

General Principles of Councillor Conduct:

In accordance with the public trust placed in me, on all occasions:

- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect
- I lead by example and act in a way that secures public confidence in the role of Councillor.

In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community.
- I do not improperly seek to confer an advantage, or disadvantage on any person.
- I avoid conflicts of interest.
- I exercise reasonable care and diligence...

You are also expected to uphold high standards of conduct and show leadership at all times when acting as a Councillor.

As a councillor:

- 1.1 I treat other councillors and members of the public with respect.
- 1.2 I 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.
- 5.1 I do not bring my role or local authority into disrepute.
- 6.1 I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.
- 9.1 I register and disclose my interests.

### Principles of Public Life (Nolan Principles) which may have been breached by Councillor Morgan (relevant extracts of relevant Nolan Principles shown) :

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must...disclose and resolve any interests and relationships.

#### Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

#### 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.

#### Openness

Holders of public office should act and take decisions in an open and transparent manner...

#### Honesty

Holders of public office should be truthful.

#### Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles...

## Planning Code of Local Practice which may have been breached by Councillor Charmaine Morgan (relevant extracts shown):

### SUMMARY:

#### Do:

- Familiarise yourself with the Code of Conduct and follow it when you are representing the Council.
- Keep your register of interests up to date.
- Be aware of what fairness and impartiality mean in your role
- Be aware of what Disclosable Pecuniary Interests, personal and prejudicial interests are – refer to the Monitoring Officer or the Code of Conduct if you are unsure.

#### Do not:

- Use your position improperly for personal gain or to advantage your friends or close associates.
- Attend meetings or be involved in decision-making where you have a Disclosable Pecuniary Interest or a prejudicial interest = except when speaking where the general public are also allowed to do so.
- Prejudge or be seen to prejudge an issue if you want to be a decision-maker on a proposal.

- Seek to influence officers or put pressure on them to support a particular course of action in relation to a planning application.
- Compromise the impartiality of people who work for the Council.
- Invent local guides or policies.

## 2. BASIC PRINCIPLES:

The Planning process relies on transparency in decision making and Officers and Members must act fairly and with integrity.

Members have a duty to represent their constituents but also an overriding duty to the wider community.

## 3. THE ROLE OF THE PLANNING COMMITTEE:

Applications should not normally be referred to Planning Committee simply to allow and objector/applicant an opportunity to air their views in a public forum.

## 4. YOUR ROLE AS A MEMBER OF THE PLANNING AUTHORITY:

To make planning decisions openly, impartially, and with sound judgement for justifiable reasons.

## 5. RELATIONSHIP TO THE MEMBERS CODE OF CONDUCT:

Do apply the rules within the Members Code of Conduct first as these must always be complied with.

If you do not abide by this Code of Local Practice...you may put the Council at risk of proceedings regarding legality or maladministration of the related decision.

## 6. DEVELOPMENT PROPOSALS AND INTERESTS UNDER THE MEMBERS CODE OF CONDUCT:

Where you have a DPI you should not participate or give the appearance of trying to participate in the decision-making process.

## 7. FETTERING DISCUSSION IN THE PLANNING PROCESS:

Members making a decision on any planning application as part of the Planning Committee must ensure that they have not already fettered their discretion. This means you should come to any Planning Committee meeting with an open-mind. Whilst you should familiarise yourself with the application and the reports ahead of the meeting of the Planning Committee it is important that you haven't made your mind up on how you will vote at the meeting of the Planning Committee (or Full Council) until you have heard the Officer's presentation and all the evidence and arguments on both sides.

## 8. LOBBYING OF COUNCILLORS;

Members of the Planning Committee are free to listen to any point of view about a particular planning application, however they should avoid expressing an opinion which may indicate that they or the authority have reached a final conclusion until all of the relevant arguments and evidence has been put before the Planning Committee.

9. LOBBYING BY COUNCILLORS:

Whilst a Member can speak on behalf of a body of opinion, they should not personally be involved in organising support for or against that opinion.

11. DECISION MAKING:

Decisions on planning applications have to be taken in accordance with the Development Plan unless material considerations indicate otherwise.

ends

## **Appendix 2 Cllr Morgan's Initial Response**

**From:** "Cllr Charmaine Morgan" <charmaine.morgan@southkesteven.gov.uk>  
**Sent:** Monday, December 15, 2025 11:48 PM  
**To:** "Rachel McKoy" <Rachel.McKoy@southkesteven.gov.uk>  
**Subject:** FW: Private & Confidential  
**Attachments:** CLLR MORGAN COMP INITAL LTR 202512081.pdf, Code of Conduct Complaint Cllr Morgan 251205.eml  
**Importance:** High

Dear Rachel

Thank you for taking the time to speak to me. Further to our discussion I have now had an opportunity to review the accusations of Misconduct in Public Office made against me.

Please find below my response and please note my request to speak to an Independent Representative in relation to this matter.

## Background

Grantham Town Council is a new town council which was established May 2024.

The first year of the new Town Council was spent mainly reviewing procedures and setting up committees. As a previous Charter Trustee and someone with over 12 years' experience as a District and also County Councillor I did my best to support this process although not on the largest group.

I was Chair of SKDC Planning throughout the year. During last year it became clear that there was a lack of knowledge or understanding of Planning among other members of the Town Council. There were no formal meetings of the Town Council Planning Committee despite the town being subject to Planning Applications on an almost Weekly basis and the subject of significant Growth. This led to a discussion at Full Council over how the Town Council would best handle Planning Applications.

It was agreed that, in the absence of any meetings, the Town Clerk would be authorised to submit comments on behalf of the Town Council, which would either be 'No Comment', or would be a collation of any comments received from members by the required deadline. No decision could be recorded by the Clerk in their response. This would not be appropriate unless there was a meeting of the Town Council.

In response to Planning Application S25/1656 the Town Council has submitted the following statement:

*We have no objections to the proposal and trust the planning officer's expertise in making an appropriate decision however the following concerns were raised:*

- The property had a previous maximum capacity of 17 as a nursing home and was marketed and sold as a 14 bedroom property. The proposed number of occupants exceeds this amount.*
- Will there be laundry/washing facilities in each property as only one laundry facility for a 24 bed property is not enough.*
- There is no communal living space other than the kitchens and the bathroom and toilet facilities seem slim*
- There is limited parking at the rear of the property and potentially too few for 24 vehicles.*
- Disturbance to local residents is likely to occur when changing from a minimal disturbance nursing home to two 12 bed HMO's*
- Ensuring the character and features of the property are in keeping with the local area*

'No Objection' is a decision and would imply there had been a meeting.

At no time did the Town Council state that it would accept the expertise of the SKDC Planning Officers without due consideration.

Furthermore, it is incorrect to imply that SKDC Officers would make a decision.

SKDC officers make Decisions on applications that do not come to committee. Where a case comes to committee officers would make a 'Recommendation'.

Members of the Planning Committee make the decisions.

It is very common for Town and Parish councils to challenge the recommendations of Planning Officers or raise objections to applications.

Some just choose to submit concerns or comments.

Having not been at all involved in the Town Council Planning last year, I was approached regarding offering support this year. I was elected by the Town Council, knowing I was also Chair of the District Council Planning Committee, to be Vice Chair of the Planning Committee.

Very few members of the Town Council had an interest in sitting on the Planning Committee.

In the absence of a Monitoring Officer to speak to at the time, I checked with the Lead Planning Officer who advised this would not be an issue, as long as I was satisfied that I had no predetermination on approaching a planning application and made appropriate Declarations of Interest.

This is a standard protocol for any member of the Planning Committee who is double hatted, including the Vice-Chair.

During an informal conversation with the Chair of the Town Council Cllr Marie Reid in the Parlour, she mentioned that she and Chloe Goswell, the Town Clerk, were struggling to understand some of the material planning conditions and what could apply. This was fully understandable given there is so much to learn and they only had a brief training session. I agreed to offer to help with this. Cllr Harrison was not party to that conversation nor was Cllr Baxter. Cllr Baxter's accusation that I am being patronising is unfair. I was acknowledging a request for support and offering some advice.

On reflection I should have used a different case as an example.

I had not realised, until seeing this Town Council response, how much they were struggling, believing that No Comment, or listing concerns was their Default position, as we had agreed.

The first and larger part of my email is explaining some of the background considerations. Given the interest in any controversial applications that could impact on the Town Council I am also advising the Clerk and Chair of the Town Council that I was aware a number of members had already contacted me wishing to speak on the case. It was correct to state their position could be undermined by the statement of No Objection, which was incorrect as it had not been formed by any official meeting of the Town Council.

After the background preamble I conclude with the following statement which appears to have been ignored by both complainants:-

**I suggest that, if resubmitted, at the very least the paragraph 'We have no objections to the proposal and trust the planning officer's expertise in making an appropriate decision however the following concerns were raised:-**

**Is replaced with The following concerns were raised:.....**

I made a SUGGESTION and state IF re-submitted...

I am leaving any decision to the Town Council and made no attempt to follow up on this.

Nor did I instruct them to do anything as Cllr Baxter suggested to me at our meeting which I detail below. I was providing support and advice at the Chair's request.

Furthermore, for the duration of the hearing of the Planning Application I was stepping down from my role as Chair of Planning.

The Chair of the Town Council also independently approached the Lead Planning Officer to check if I could sit on both committees, taking into account my roles, and was given the same response.

When attending LALC Chair training on 30 September, I mentioned my double hatted role and no issue was raised other than to be mindful of my position on any application.

Since the inauguration of SKDC Town Council there have been NO Planning Applications brought before the Planning Committee.

There has therefore been no Conflict of Interest.

We had one Planning meeting on Thursday 6 November 2025, which I attended, to discuss the disproportionately high number of HMOs in Grantham which came to light in a recent report. The majority of these are in St Vincent's Ward. My Town and District Ward.

A number of Planning Applications sited in Grantham have come before South Kesteven District Council and appropriate declarations have been made by myself and Cllr Tim Harrison, in line with advice from Legal officers.

**Cllr Tim Harrison**



After the Castlegate hearing a Weekly List notified members that a planning application for another Change of Use of a Care Home to an HMO had been submitted for 6-8 Dudley Road, Grantham. This time in St Vincent's Ward which is my Town and District Ward.

After an initial open minded look at the application on Dudley Road I had material planning concerns and submitted a Call In request for the case to come to committee, as any member is entitled to do under the Constitution. As I further considered the details of the application and comments made by the Applicant's Agent, I realised that the reasons for Refusal outlined in the earlier application for an HMO in Castlegate applied to the Dudley Road site. Therefore, it would not be appropriate for me to support the application and I could not keep an open mind, especially with other concerns being raised by members of the public online. Some of these were in line with the concerns referred to by the Town Clerk. I notified the Planning Case Officer and Vice-Chair that I would be standing down from my role as Chair of the Planning committee to speak Against the application should/when it comes to committee.

Cllr Baxter appears to have misinterpreted my notification of this decision to the Vice Chair when he accuses me of discussing the case with Cllr Penny Milnes.

I then undertook a further review of the Comments made in the Planning Portal online.

At this point I read the submission made by the Town Council.

I was fully expecting it to correspond with the arrangement agreed at Full Town Council i.e. either No Comment or a collation of any comments made – whatever they were.

Instead it contained a number of errors/misleading statements:-

- a. "No objection" is a decision, and there had been no meeting of the Town Council Planning committee to discuss the case.
- b. The comment implied that the Town Council would go along with whatever the Planning Officers at SKDC recommended given their experience – which is not an appropriate position for the Town Council to take, given the whole point of assessing a planning application is to consider it independently, and it is frequently the case that Parish or Town Councils do not agree with officer recommendations.

I have been accused of using "undue influence" as Chair of the committee. It is the role of members, who have been specially trained, to consider each application with an open mind. Members are frequently approached and lobbied by other members of the council. Again, if staying on the committee, it is important to keep an open mind.

Only recently Cllr Milne, the Committee Vice Chair, stepped down from her role and spoke on a case in her Ward. This has been common practice in SKDC for the 13 years I have been on the committee.

I believe there has been a misunderstanding of how members of the Planning Committee work balancing their differing roles. A number are also on Town and Parish councils. My only intent in commenting to the Clerk was to address misleading information which was, and still is, available in the public domain (viewed 20:28 on 15/12/2025).

Mindful of my duty as a Councillor to challenge where there is a known issue regarding the accuracy of information, I wrote to the Town Clerk to advise them of the errors and suggested alternative wording to correct any misleading content. I considered raising a formal complaint but felt that this would be unfair to our new Town Clerk. The Planning Officer, having made an error in a letter to the Public, extended the deadline for responses. I believed therefore the Town Clerk had an opportunity to correct the error/s. The deadline for Public Comments was 14 December 2025. This has now passed and the error remains.

### **IT Issues**

I heavily rely on my Smartphone to access my SKDC MS Outlook Account and my Grantham Town Council account which have been loaded by SKDC IT officers and the former Parish Clerk.

Since June 2025 I have had ongoing IT and communications issues with SKDC. I am disabled and struggle to carry my laptop. I have to work between my laptop, when online and my personal emails. The Parish Clerk has sent non confidential notifications to my personal email. This included the Weekly List on which I first saw the HMO application S25/1656.

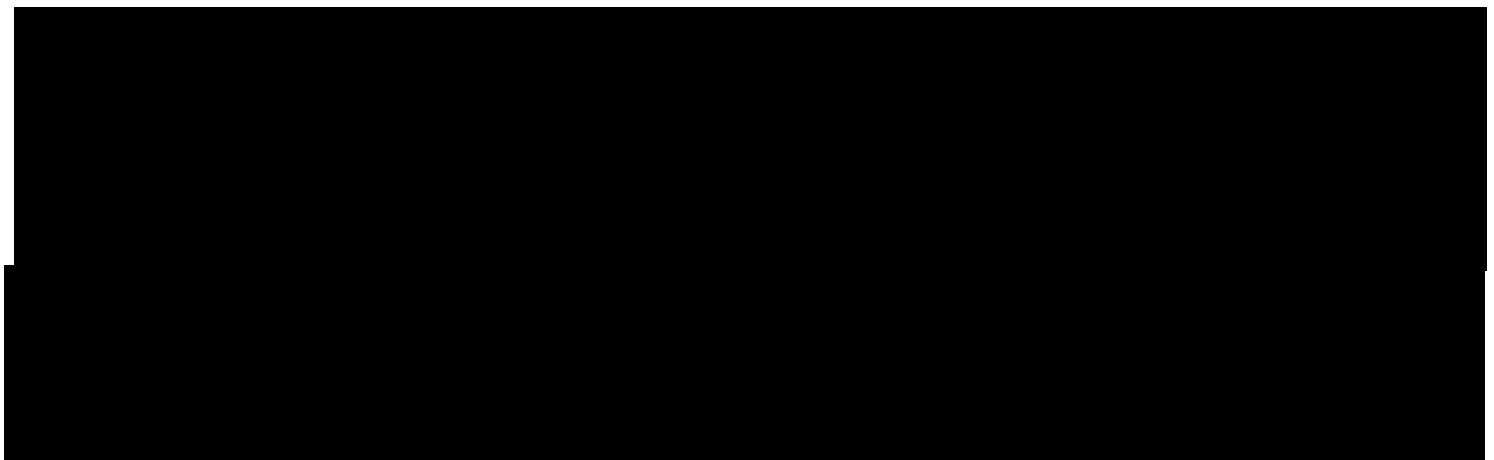
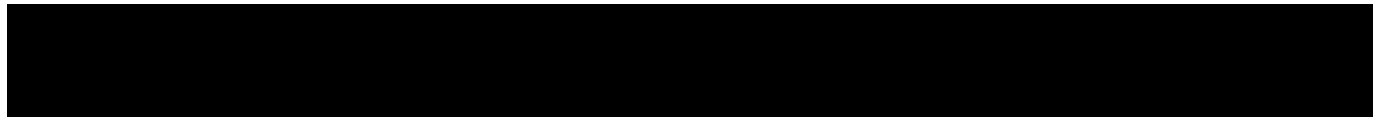
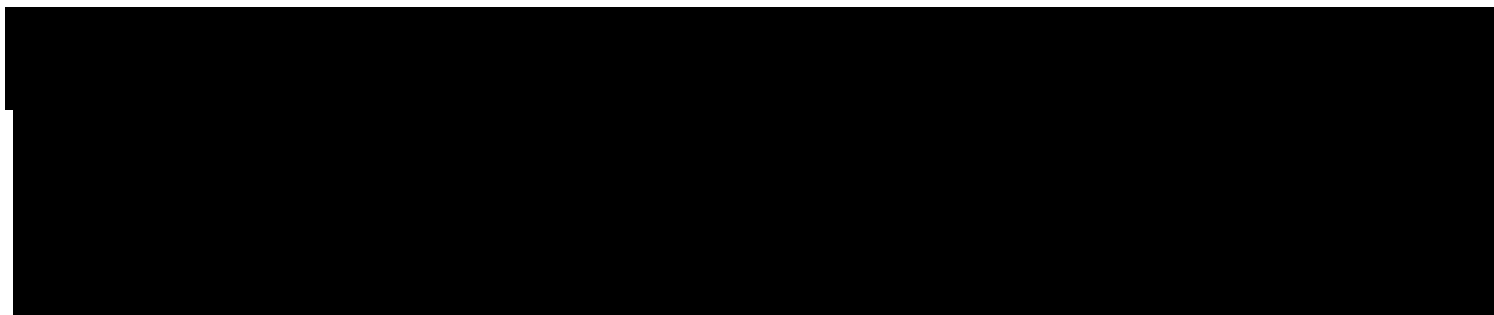
Whilst drafting my email to the Town Clerk, regarding my concerns about the wording of their online response to the Planning Application, I swapped to my SKDC laptop. Unfortunately, and deeply regrettably, the email was submitted from my SKDC account, rather than my personal email/parish council email which was my original intent. As a result, it contained my SKDC email footer which includes my role as SKDC Chair of Planning. This was an error and should not have occurred.

However, I am frequently called upon by members of the public and other members of the council and parish councils to provide advice on protocol.

Therefore, whilst in this instance, it was my intent to act in my capacity as a member of the Town Council, on reflection I do not believe it inappropriate, knowing an error had been made, to notify the Parish Clerk of that.

### **Cllr Baxter**

The concerns raised by Cllr Baxter have not been made in isolation.



On Tuesday 2 December Cllr Baxter called me into a meeting without warning, and, without telling me what the meeting was about, to discuss the complaint of Misconduct in Public Office, along with 2 SKDC Cabinet members. He called for my immediate resignation as Chair of the Planning Committee. At that time I had not seen the complaints due to my IT issues. He stated that I had instructed the Town Clerk how to act in relation to the planning response.

[REDACTED]  
It was clear from his tone and accusations that he felt my position was compromised by being on both the Town Council and Chair of SK Planning. He did not mention that he himself had put a complaint against me at that time. I only learned of this after receiving the report.

[REDACTED]

[REDACTED]

Cllr Baxter's comments hinge mainly on my taking on both roles in Planning on SKDC and the Town Council. As I stated to him, I had done due diligence and checked beforehand if this was acceptable, as had the Chair of the Town Council. It subsequently emerged during the discussion that Cllr Baxter thought Application S25/1656 was due to come to committee on 11 December. It is at a far earlier stage with the officer yet to draft the officer report and make a recommendation. The deadline for Public Comments was 14 December.

There was a cross over in my writing to the Clerk from my SKDC account, which was not my original intent, but, being aware of the error, it was not clear to me how I could correct the error at the time without appearing in any way to influence the Clerk. Unlike any other area of business of the council Planning documentation has quasi-judicial status and should be correct as far as possible.

**Emma Whittaker – Lead Planning Officer**

It has subsequently been brought to my attention that Lead Planning Officer Emma Whittaker has contacted the Interim Monitoring Officer.

She has stated I confirmed my position as not being open minded regarding the planning case S25/1656. That is correct. That is the protocol when it applies.

I notified planning officers of this and also the vice-chair as is required.

A concern was raised over my having undue influence over the committee being both Chair of Planning and speaking on an application. That has never been a concern of SKDC Planning before.

Having had no accessible monitoring officer for months, and, having been advised that interim monitoring officer Rachel McCoy only works Mondays and Tuesdays, I sought advice from the Legal Officer regarding my attendance at the Planning Committee meeting before 11 December.

Emma advised me that I could refer the matter to the Interim Monitoring Officer which I then did.

**My concerns**

It is concerning to me, that,

i. To my knowledge, no action to rectify the original error being taken either by the Town Clerk, or at the advice of the Chair, or any party involved in the complaint against me, this error remains in the Public domain and will be the formal Town Council position when the Officer Report is produced with any associated ramifications for the Town Council and SKDC in view of the public interest in the case. The deadline for correcting the error has now passed.

ii. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Cllr Baxter

[REDACTED] comments in his complaint are mainly based on assumptions and hearsay and are incorrect. He did not tell me that he had submitted a complaint himself when we met. He only referred to the complaint made by Cllr Harrison.

[REDACTED]

[REDACTED] He focused on my role as SKDC Planning Chair asking a Town Councillor officer to correct the error. Had I been able to review the reports beforehand I could have explained that my advice had been sought and there was no intent at undue influence.

He has challenged my judgement being on both the Town Council and SKDC Planning Committees but despite me highlighting that this was checked beforehand to the best of my ability he refuted this information in our meeting and persisted in attacking my judgement.

[REDACTED]

Cllr Baxter has not considered the public perception of the Town Council or SKDC if these public bodies knowingly permit a misleading and/or incorrect report to be shared in a quasi-judicial Planning case report which could have some bearing on a planning decision which is already highly contentious. [REDACTED]

Nor has there been a focus on the public perception of an SKDC Councillor who was Chair of the Planning Committee being challenged for raising an awareness of an issue with appropriate parties and that concern being ignored by the Chair of Governance and Audit of SKDC and the Leader of the Council.

In my discussion with the Interim Monitoring officer, I was advised that because of this complaint against me I cannot both speak on SKDC Planning Case S25/1656 and retain my position as Chair of Planning. A role I undertake on behalf of the Council and which I have done fairly and diligently to the best of my ability.

I have been advised if I step down as Chair of Planning I can speak on Planning Application s25/1656.

### **HMOs**

I am currently considering my position overall. I have done my best to represent SKDC but there comes a time when I have to look at the needs of my community. It is clear that some members are unhappy that I am questioning the number of HMOs in St Vincent's Ward. I am not opposed to HMOs. In fact I welcome the additional housing they provide single people. And having spent this summer trying to get SK Housing officers to house 24 people living in tents in my Ward this means more to me that some. I am concerned, however at the density of the HMOs and their impact on the availability of affordable family homes in the town centre and the amenity of neighbouring residents. I have a number of questions I need to raise regarding this matter and if my role as Chair of Planning is compromised by this I will need to step down regardless of the outcome of this hearing.

### **Local Plan**

I am also mindful as are others of the impact of the new developments in our District and the infrastructure requirements to support them.

This is also a consideration. Again, the highest density of new development is planned for the edge of my

ward and will impact on my community.  
I am currently on the SKDC Working Party

### Summary

In considering the complaints made against me, my only aim was to attempt to provide support and advice having identified errors made by a Public Official in the Town Council that would subsequently be in the public domain. I made a suggestion which they opt to follow should they chose. As a result of the error it will be appropriate for the Town Council to revisit how it responds to any planning application.

Whether in my role as a Town or District Councillor or Chair of Planning I believe it is my duty, once an issue has come to my attention, to bring the error to the attention of the officer concerned. In this case I believe that I was providing support to a busy officer through the provision of an alternative form of words that would remove any misleading statement within the submission but retain the core comments. My main interest was to protect the reputation and integrity of the Town Council and the integrity of the Planning process within the SKDC.

I deeply regret any use of wording that may have offended the Chair of the Town Council or the Clerk. This was entirely unintentional. Having met them both subsequently at a meeting of the Town Council they have not raised a concern with me.

I had also considered submitting an FOI to check all of the submissions sent to SKDC by Grantham Town Council once I was aware of the problem. However, I was mindful that the Clerk is new, is exceptionally busy and Christmas is coming. I decided to take an informal approach and discuss the matter later.

At my meeting with Cllr Baxter after the Cabinet meeting on 4<sup>th</sup> November asked where my loyalties lie. My loyalty is to my community and to undertaking my role to the best of my ability which I have done for the last 13 years without any such a complaint being raised.

If I have to step down from my role as Chair of Planning in order to use my experience to support my community then I will even though other members of the committee have asked me not to.

Whatever the intention, by enabling an erroneous statement to the Planning Officers of SKDC to stand uncorrected in a quasi-judicial situation and after it has been pointed out both Cllrs Baxter and Harrison are bringing their respective councils into disrepute.

Kind regards,  
Charmaine

Town & District Councillor Charmaine Morgan  
Grantham St Vincent's Ward  
Mob: 07398 156 296

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**From:** Rachel McKoy <[Rachel.McKoy@southkesteven.gov.uk](mailto:Rachel.McKoy@southkesteven.gov.uk)>  
**Sent:** 10 December 2025 08:31  
**To:** Cllr Charmaine Morgan <[charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)>  
**Subject:** Re: Private & Confidential  
**Importance:** High

Dear Cllr Morgan,

Thank you for your email.

### Member Code of Conduct Complaint

I am sorry to hear you are experiencing difficulties with your IT. I will be attending Council at the Law Society today but can make arrangements to speak with you about the complaint given the gravity of the allegations contained within it, which I appreciate you are concerned about.

Just to confirm, I will also require a written response containing any comments you may wish to make to share with the Council's appointed Independent Person. I have attached a copy of the letter I forwarded to 39

you on Monday, with a copy of the complaint for ease of reference, and would be grateful if you could confirm if you will be able to provide this by close of business this Friday and if not confirm if you require an extension of time.

## **Planning Committee Attendance**

Additionally, I am writing to advise you that concerns have been raised with me by the about your involvement in determining application S25/1656 HMO Dudley Road at the forthcoming planning committee scheduled to be held on the 11 December 2025. These concerns are from Emma Whittaker (Assistant Director of Planning & Growth) and relate to pre-determination, potential lobbying and bias.

I understand that you had a conversation with Emma regarding this matter and potential conflicts on the 4 December 2025, during which you confirmed that you would be standing down as Chair for this item. You were also advised to seek the advice of the Monitoring Officer and I note that we are scheduled to speak.

I appreciate that our diaries may cross and am therefore writing to confirm that my strong advice is that you do not take part in this item either as Chair or Ward Member. This is due to the fact that there is a live code of Conduct Complaint being determined that raises some serious allegations against you relating to this application as set out in my letter dated 8 December 2025 (attached above).

It is also the case that any involvement in your capacity as Ward Member could also be perceived as an attempt to influence the committee, given your status as Chair, and due to allegations being made that you have sought to lobby the Vice Chair (Cllr Milnes). This is an allegation raised in the extant complaint and now raised by the AD of Planning & Growth who has shared with me an exchange of correspondence, dated 30 October, addressed to [REDACTED] (04.39), and copied to Cllr Milnes, which appears to reflect that you had taken a position on the application.

It is important that the decisions of the Planning Committee uphold the ethical framework and are not exposed to the risk of legal challenge. Further, it is equally important that you are safeguarded against any additional allegations of potential breaches of the Code of Conduct whilst the current complaint is being addressed.

If you are available to speak with me today my telephone number is [REDACTED] I will return any missed calls in the scheduled breaks.

I look forward to speaking with you in due course.

With kind regards

**Rachel Mckoy**  
**Interim Monitoring Officer**

South Kesteven District Council  
Council Offices  
The Picture House,  
St Catherine's Road,  
Grantham NG31 6TT  
[rachel.mckoy@southkesteven.gov.uk](mailto:rachel.mckoy@southkesteven.gov.uk)  
[www.southkesteven.gov.uk](http://www.southkesteven.gov.uk)

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**From:** Cllr Charmaine Morgan <[charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)>  
**Sent:** 09 December 2025 23:24  
**To:** Rachel McKoy <[Rachel.McKoy@southkesteven.gov.uk](mailto:Rachel.McKoy@southkesteven.gov.uk)>  
**Subject:** RE: Private & Confidential

Dear Rachel

Thank you for your contact.

Unfortunately I have been having IT issues and have just found your email from last week. I can only apologise for the delay in my response.

I was already completely booked up today and could not have made a Teams meeting. I am scheduled to Chair Planning on Thursday and will be in a pre-planning meeting beforehand. Unfortunately it is difficult to determine how long the meeting will go on for.

As a member of 13 years, who has had no former complaint upheld against me, I am deeply distressed/concerned at the accusations which have been made and wish to put these into context and to clarify my position.

I am able to make a Teams meeting next Monday or Tuesday. I do hope this suits you.

Kind regards

*Charmaine*

**South Kesteven District Councillor Charmaine Morgan  
(Democratic Independent) Grantham St Vincents Ward**

*Chair SKDC Planning*

*Member SKDC Housing OSC*

*SKDC Member of LCC Health Scrutiny Committee*

**Grantham Town Councillor**

Contact: [Charmaine.morgan@granthamtowncouncil.org](mailto:Charmaine.morgan@granthamtowncouncil.org)

**Mob: 07398 156 296**

**Email: [charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)**

**c/o The Picture House,**

**St Catherines Road**

**Grantham, Lincolnshire, NG31 6TT**

**[www.southkesteven.gov.uk](http://www.southkesteven.gov.uk)**



**SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL**

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**From:** Rachel McKoy <[Rachel.McKoy@southkesteven.gov.uk](mailto:Rachel.McKoy@southkesteven.gov.uk)>

**Sent:** 08 December 2025 13:32

**To:** Cllr Charmaine Morgan <[charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)>

**Subject:** Private & Confidential

Dear Cllr Morgan,

I hope you are well.

I write to inform you that I have received a complaint made under the Members Code of Conduct against you.

I would be grateful if you could review the content of the complaint and provide any comments you may have in response to me in writing by the close of business this week 12 December 2025. If this timeline presents any difficulty please let me know as soon as possible.

If you wish to discuss this matter, please let me know and I will get a date diarised. I did provide details of my availability last week, which will be today, Tuesday and Thursday of this week. Sincerely,  
Charmaine Morgan

## **Appendix 3 Cllr Morgan's emails re IT problems**

**From:** "Charmaine Morgan" [REDACTED]  
**Sent:** Monday, January 19, 2026 1:02 PM  
**To:** [REDACTED] <[REDACTED]@anthonycollins.com>  
**Subject:** Fwd: Ref 030278.0006

Dear Claire

Further to our discussion please note below from Granrham Town Clerk regarding my IT issues.

Best regards  
Charmaine

Charmaine Morgan  
Grantham Town Councillor  
St Vincent's Ward  
Tel: 01476 574748  
Mob: 07398 156296

45 Harrowby Road  
Grantham  
Lincolnshire  
NG319ED

----- Forwarded message -----

**From:** Charmaine Morgan [REDACTED]  
**Date:** Fri, 16 Jan 2026, 14:15  
**Subject:** Re: Email  
**To:** Clerk <[clerk@granthamtowncouncil.org](mailto:clerk@granthamtowncouncil.org)>

Hi Chloe

I can make next Friday afternoon but may struggle bringing in laptop. It will be Subject to finding a parking space nearby.

Can you please print off the documents for the cllr vacancy as well. [REDACTED]

Thankyou.

Best regards  
Charmaine

Charmaine Morgan  
Chair SOS Grantham Hospital  
Conserving Grantham  
Grantham Remembers

Tel: 01476 574748  
Mob: 07398 156296

45 Harrowby Road  
Grantham  
Lincolnshire  
NG319ED

On Fri, 16 Jan 2026, 10:11 Clerk, <[clerk@granthamtowncouncil.org](mailto:clerk@granthamtowncouncil.org)> wrote:

Good morning

Please can you confirm when you're free to attend the Parlour to sort the ongoing issues with your councillor email address?

Kind regards

**Chloe**

Chloe Goswell- Town Clerk

Grantham Town Council

My usual working days are Tuesday - Friday, 9:30am till 3:30pm.

Meetings in the Parlour are by appointment only.

T: 01476 847817 E: [clerk@granthamtowncouncil.org](mailto:clerk@granthamtowncouncil.org) W: [granthamtowncouncil.org](http://granthamtowncouncil.org)

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**From:** Charmaine Morgan [REDACTED]

**Sent:** 15 January 2026 12:15

**To:** Clerk <[clerk@granthamtowncouncil.org](mailto:clerk@granthamtowncouncil.org)>

**Subject:** Test message

Hi

Just saying Hi on your email.

Best regards

Charmaine

Charmaine Morgan

Tel: 01476 574748

Mob: 07398 156296

[45 Harrowby Road](#)

[Grantham](#)

[Lincolnshire](#)

[NG319ED](#)

## **Appendix 4 Cllr Morgans Register of Interest**

# Register of interests

## Councillor Charmaine Morgan

This register of interests was published on Tuesday, 30th September, 2025, 11.16 am.

I, Councillor Charmaine Morgan, a Member of South Kesteven District Council (the Council), give notice of registration of my disclosable pecuniary interests, and those of my spouse/civil partner, which I am required to declare under the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, and in accordance with the Members' Code of Conduct adopted by the Council

### 1. Employment, office, trade, profession or vocation

#### Member's interest

SKDC Councillor

#### Spouse/civil partner's interest

Ministry of Justice, HMP Stocken

### 2. Sponsorship

#### Member's interest

Transform £200 toward County Election Campaign

#### Spouse/civil partner's interest

Transform £200 toward County Election Campaign

### 3. Contracts

#### Member's interest

None

#### Spouse/civil partner's interest

None

### 4. Land

#### Member's interest

45 Harrowby Road, Grantham, NG31 9ED  
Allotment x 1, Harrowby Road Allotments

#### Spouse/Civil partner's interest

45 Harrowby Road, Grantham, NG31 9ED  
Allotment x 1, Harrowby Road Allotments

### 5. Licences

#### Member's interest

None

#### Spouse/civil partner's

None

### 6. Corporate tenancies

#### Member's interest

None

#### Spouse/civil partner's interest

None

## 7. Securities

### Member's interest

None

### Spouse/civil partner's interest

None

## 8. Other Registerable Interests

### Members Interest

Chairman - SOS Grantham Hospital

### Spouse/civil partner's interest

Secretary SOS Grantham Hospital

## **Appendix 5 Cllr Morgans comments on the draft report**

**From:** Cllr Charmaine Morgan <charmaine.morgan@southkesteven.gov.uk>

**Sent:** 23 February 2026 04:29

**To:** Claire Ward [REDACTED]

**Subject:** RE: Confidential South Kesteven District Council - 030278.0006 - Standards Investigation [ACS-ACTIVE.FID5906965]

Dear Claire,

Further to my previous email please note my response to your draft report below.

Thank you for sharing your Draft report.

I note your conclusion however and strongly object to it.

How can I be accused of bringing the council into disrepute for attempting to correct an inaccurate statement with the Town Council Clerk and Chair who had previously sought my advice?

That is what the case against me amounts to.

The three councillors who wanted the misleading/incorrect statement to stand within a quasi-judicial Planning environment have been permitted to challenge me, [REDACTED]

Cllr Tim Harrison – Chair of Governance and Audit

Cllr Ashley Baxter – Leader of the Council

Cllr Phil Dilks – Cabinet Member for Planning

Furthermore, as a result of their ongoing complaint, I was prevented by the temporary Monitoring Officer from either speaking or even presenting a written statement to the Planning Committee regarding the case concerned which raised comment from residents in my ward.

Your conclusion implies I acted to my own or other benefit.

The Local Government Association states that it is the primary role of any councillor to represent our communities. If I am guilty of anything it is this. I have acted as Chair of Planning impartially and to the best of my ability.

I stated that I would be objecting to the case concerned to officers, and had already approached my fellow ward councillors, with no political gain given they represent other parties including opposition parties, because it is important in Planning to be politically impartial, even with relation to planning matters in my own ward. Unlike me, they were able to speak at the Planning hearing.

I wrote to the Grantham Town Clerk not for personal gain, or that of any other parties, but to ensure that best practice was followed in view of my significant experience as a member of the District Council, a long standing member of the Planning Committee and current Chair of SKDC Planning Committee.

I wrote only with the intent of correcting a misleading/erroneous statement.

I have considered the accusation that as Chair of Planning the matter is more serious. Whatever my role, I believe, if I am aware of an error, it is my duty as a councillor to bring it to the attention of relevant parties. In all of my roles, and especially as Chair of Planning, I am frequently consulted on planning matters and due process by members of the public, and elected representatives.

I observed an inaccurate statement had been made by the Town Council which could not only lead to a misrepresentation of the Town Council to a quasi-judicial decision-making body, but also place the Town Council in a position of disrepute with the local community. The statement of 'No Objection' was also at odds with submissions made to me by both Town and District Councillors regarding the case concerned.

In my email I explained why the wording used by the Town Clerk was inaccurate, in that it implied there had been a formal decision of the Town Council when there had not. I pointed out an error and SUGGESTED that, IF minded to, they may wish to make a minor alteration that corrected the ERROR in the wording only.

NB: Please note your draft report does not emphasise, as I have, the key wording IF that I used in my original email.

It is my understanding that the primary role of ANY councillor is to act in the best interest of our community. When identifying the error, I acted as a 'critical friend' and brought it to the attention of the Town Clerk and Chair who had previously sought my advice and did not raise any objection themselves.

My only motive was to ensure the integrity of the Town Council and SKDC Planning process being aware that no public meeting had taken place before the statement was made and that by stating 'No Objection' there was an implication a formal decision had been made by council members when it had not.

During our meeting I stated I was mortified that my message had gone out from the District Council email. This was because I was unaware the message had gone out with my auto signature and that was not my original intent.

Considerable weight has been placed on my being Chair of SKDC Planning.

However, I believe, whatever role I have as a councillor, it is my duty to bring errors to the attention of appropriate parties. If not, then on identifying the error what should I, as a councillor, have done?

I believe my role as Chair of Planning places more emphasis on the need to ensure the accuracy of information coming before the committee when an issue is identified.

Or do you suggest that the Chair of SKDC Planning should ignore a misleading statement once identified? That is the implication of the accusation made against me.

What will members of the public think of that when this becomes public knowledge, which it will?

If it is the culture of SKDC to challenge a member identifying an issue rather than address the issue concerned that is hugely concerning. I do not believe that this is the view of my colleagues.

To date, to my knowledge, the issue remains within Grantham Town Council and no effort has been made to correct it despite the Chair of Governance and Audit and Leader of SKDC being aware. As a result further similar errors have subsequently been made.

In view of the potential seriousness of this matter why does your report not also examine the actions of the councillors named above?

Furthermore, due to the complaint made being in progress I was prevented from speaking but even providing a written representation to the Planning Committee regarding the case in my Ward and was denied the right to represent my community. This raised questions from members of public in my community.



Kind regards

*Charmaine*

**South Kesteven District Councillor Charmaine Morgan**

**Grantham St Vincents Ward**

**Mob: 07398 156 296**

**Email: [charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)**

**c/o The Picture House,**

**St Catherines Road**

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[www.southkesteven.gov.uk](http://www.southkesteven.gov.uk)

**From:** Cllr Charmaine Morgan

**Sent:** 23 February 2026 04:29

**To:** 'Claire Ward' [REDACTED]

**Subject:** RE: Confidential South Kesteven District Council - 030278.0006 - Standards Investigation [ACS-ACTIVE.FID5906965]

Dear Claire,

Further to my previous email please note my response to your draft report below:-

Thank you for sharing your Draft report.

I note your conclusion however and strongly object to it.

I am being accused of bringing the council into disrepute for attempting to correct an inaccurate statement made in evidence submitted to a quasi-judicial committee by Grantham Town Council Clerk and Chair who had previously informally sought my advice on planning matters.

I had no personal gain from this action and my action was to ensure probity within the overall Planning process not the opposite. In doing so my aim was to protect the reputation of both the Town and District Council and not harm them.

Whilst the issues with IT led to an email going out in error with my title as Chair of SKDC Planning, as Chair of Planning I consider it all the more important to ensure probity within the overall Planning process and to address issues if they are identified.

Kind regards

*Charmaine*

**South Kesteven District Councillor Charmaine Morgan**

**Grantham St Vincents Ward**

**Mob: 07398 156 296**

**Email: [charmaine.morgan@southkesteven.gov.uk](mailto:charmaine.morgan@southkesteven.gov.uk)**

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## **Appendix 6 Investigation Chronology**

## Complaint Chronology – Code of Conduct Investigation

<b>Date of Complaint:</b>	05/12/2025 (Cllr Ashley Baxter, Complainant 1) 15/12/2025 (Cllr Phil Dilks, Complainant 2)		
<b>Date Investigating Officer was appointed:</b>	17/12/2025		
<b>Date of interviews:</b>	<b>Name</b>	<b>Date</b>	
	Charmaine Morgan (Subject Member)	16/01/2026	
	Cllr Dilks	19 <sup>th</sup> January 2026	
<b>Date draft report sent to the Monitoring Officer:</b>	30 <sup>th</sup> January 2026		
<b>Date draft report sent to complainants and subject member</b>	<b>Complainant</b>	<b>Subject Member</b>	
	6 <sup>th</sup> February 2026	6 <sup>th</sup> February 2026	
<b>Date comments were received about the draft report:</b>	<b>MO</b>	<b>Complainant</b>	<b>Subject Member</b>
	2 <sup>nd</sup> February 2026	Not replied	23 <sup>rd</sup> February 2026
<b>Date the final report was issued:</b>	2 <sup>nd</sup> March 2026		