

**Committee on Standards in Public Life
Room G07
1 Horse Guards Road
London
SW1A 2HQ**

**Baroness Manningham-Buller
Chair, Conduct Committee, House of Lords
House of Lords
SW1A 0PW**



**Committee on
Standards in
Public Life**

24 October 2024

Dear Baroness Manningham-Buller,

Thank you to you and members of the Conduct Committee for your invitation to give oral evidence to the review of the Code of Conduct for Members and Guide to the Code, and for your time on Wednesday 9 October.

I welcome the Conduct Committee's review, and consider it good practice for codes to be reviewed regularly to learn lessons from their administration and in light of changing standards and expectations. I welcome your wish to make the Code more accessible and understandable not just to peers, but also to the public. This could have a beneficial impact on reinforcing public confidence in the House of Lords, which I note is a key objective of the review.

I would like to confirm that we welcome the upfront and specific reference to the Principles of Public Life and how they should inform members' conduct in paragraph 12 of the Lords Code of Conduct, and paragraphs 10 and 11 of the Guide, which make clear that the Principles "provide the context within which the House of Lords Code of Conduct is read and implemented", and that the Principles "are taken into account when investigating any alleged breach of the provisions in other sections of the Code".

We did note, however, that the Code does not reflect the up-to-date leadership descriptor, which was updated by CSPL in its 2021 report [Upholding Standards in Public Life](#). The Committee reflected on the need to include a greater focus on standards of interpersonal behaviour, and therefore added a provision on respect:

*"Holders of public office should exhibit these principles in their own behaviour **and***

treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs".

We would recommend that the Code includes the updated descriptor.

You asked me, when I gave evidence, what makes a good Code of Conduct. You also asked whether I had any examples of codes that I regard as effective, both in terms of how they incorporate and adapt the Nolan Principles; and how they deal with conduct that occurs "outside the ambit of the institution, but which may damage the [reputation of the] institution as a whole", for example on social media.

I would refer the Committee to the CSPL's 2013 [Standards Matter](#) report, which outlined several essential characteristics that a good code of conduct should embody:

- seen as relevant every day and not exceptional.
- proportionate – giving enough detail to help guide actions without being so elaborate that people lose sight of the underlying principles.
- adapted to the needs and context of each organisation.
- wherever possible, framed positively.
- personalised. Active personal commitment can have a big impact on encouraging people to behave in the right way.
- reinforced by positive leadership and embedded in the culture of the organisation.

Bespoke descriptors can help explain how the Principles apply directly to an individual's role and responsibilities within an organisation. An example of this is the Association of School and College Leaders' [Framework for Ethical Leadership in Education](#), which adapts the descriptors of the Seven Principles of Public Life to explain what they mean in the context of educational leadership and sets out a set of personal characteristics or virtues expected of leaders

On the question of codes that deal with outside conduct that might cause reputational damage, including on social media, I would refer you to the following:

The Local Government Association took forward a CSPL recommendation from its 2019 [Local Government Ethical Standards](#) report, and produced after consultation a non-mandatory [Model Member Code of Conduct](#), which aims to encourage good conduct, and safeguard public trust and confidence in local government, and serves as a template for councils to adopt, to ensure that all councillors adhere to high standards of leadership and performance. The Code outlines the minimum standards of behaviour expected from councillors and provides guidance on how these standards should be upheld. Specifically, the Code applies not just when a Member is acting in their capacity as a representative of the Council, but also when they "could be deemed to be representing [the] Council or if there are potential implications for the Council's reputation". This includes conduct on social media.

The College of Policing's 2024 non-statutory [Code of Ethics](#), which complements a statutory [Code of Practice](#) to support everyone in policing to provide ethical and

professional policing services. The Code of Ethics includes ethical policing principles to support decision making, as well as guidance on ethical and professional behaviour. Specifically the Code says: "we recognise that using social media, even when it is out of work and in our private lives, may still breach regulations or the terms of our employment if it discredits the police service as a whole or undermines public confidence in it."

Thank you again for your time, and we look forward to seeing the outcome of this inquiry.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Doug Chalmers', with a stylized flourish at the end.

Doug Chalmers