



PARLIAMENT OF TASMANIA

**JOINT STANDING COMMITTEE ON
INTEGRITY**

**A Code of Conduct for Members of
the Parliament of Tasmania**

*Laid upon the Tables of both Houses of Parliament pursuant to section 26
of the Integrity Commission Act 2009*

MEMBERS OF THE COMMITTEE

Legislative Council

Mr Dean (Chair)
Mr Mulder (Deputy Chair)
Mr Gaffney

House of Assembly

Ms Giddings
Mr Shelton
Ms Woodruff

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1 INTRODUCTION

- 1.1 The Integrity Committee is pleased to present to the Parliament a draft Code of Conduct for consideration by both Houses.
- 1.2 Pursuant to section 24(1)(c) of the Integrity Commission Act 2009¹ (the Act), the Joint Standing Committee on Integrity (the Committee) reports to the Legislative Council and the House of Assembly on its examination of the draft “Code of Conduct for Members of Parliament” (Code of Conduct).
- 1.3 In May 2016 the Integrity Commission prepared a report “Review of Codes of Conduct for Members of Parliament, Ministers and Ministerial Staff, Summary Report” (Summary Report 2016). This report can be found at Appendix A. For background information on the history of this issue please refer to the Report.
- 1.4 The 2016 “Revised Draft Code of Conduct for Members of Parliament” is a revision of the 2011 Code of Conduct proposed by the Integrity Commission in its report, tabled in both Houses on 23 June 2011.²

2 CODE OF CONDUCT

- 2.1 The draft proposed by the Integrity Commission is as follows:-

Code of Conduct for Members of Parliament

PREAMBLE

Members of Parliament recognise that their actions have a profound impact on the lives of all Tasmanian people. Fulfilling their obligations and discharging their duties responsibly requires a commitment to the highest ethical standards to maintain and strengthen the democratic traditions of the State and the integrity of its institutions.

Compliance with the law is not always enough to guarantee an acceptable standard of conduct. Members must act not only lawfully, but also in a manner that will withstand the closest of public scrutiny. This Code has been developed for the guidance of all Members of Parliament. It sets out ethical standards and principles to assist members in observing the expected standards of conduct in public office and to act as a benchmark against which that conduct can be measured.

Neither the law nor this Code is designed to be exhaustive, and there will be occasions where members will find it necessary to adopt more stringent norms of conduct in order to protect the public interest, and to enhance public confidence and trust. In making choices about conduct, members should have regard to prevailing community

¹ Integrity Commission Act 2009 (No. 67 of 2009)

² “Code of Conduct for Members of Parliament, Ministers and Ministerial Staff in Tasmania”,

values and standards. They should also, where possible, avoid giving unnecessary offence to groups in the community whose beliefs and views differ from the mainstream.

Members of Parliament are to promote and support this Code by leadership and example.

Statement of values

This Code is derived from the fundamental values of the institution of the Parliament in this State. By adopting and upholding this Code, all Members of Parliament share in and support these values.

As Members of Parliament, we value:

- the public interest and the fundamental objective of public office to act solely in terms of the public interest;
- the improvement of the economic and social conditions of all Tasmanian people, and our service to our fellow citizens to achieve this;
- the promotion of human, social and environmental welfare through the responsible execution of our official duties;
- integrity, honesty, accessibility, accountability, fairness, transparency, courtesy, respect and understanding;
- loyalty to shared principles, respect for differences, and fairness in political dealings to our fellow Members of Parliament; and
- ethical political practices that support the democratic traditions of our State and its institutions, and the rejection of political corruption.

ETHICAL STANDARDS

Conflict of interest

A member protects and upholds the public interest by taking all reasonable steps to avoid, disclose and manage any conflict of interest that arises, or is likely to arise, between her/his personal interests and her/his official duties.

A conflict of interest may be financial or non-financial. A conflict of interest may be potential, actual or perceived.

A conflict of interest does not exist where the member, their spouse or domestic partner, relative or associate is affected only as a member of the public or of a broad class of persons.

Each member is individually responsible for avoiding and managing conflicts of interest.

Declaration of personal interests

A member is personally responsible for full and accurate disclosure of her/his financial and other interests, particularly in accordance with their obligations under the Parliamentary (Disclosure of Interests) Act 1996.

Members who have a material interest in a matter being considered as part of their official duties must not vote or participate in discussions on that matter unless they

have first declared their interest to Parliament, or in any other public and appropriate manner.

Use of public office

A member makes proper use of her/his office to represent and serve the community, conducting herself/himself in ways that maintain the trust and confidence of the public in the office of a Member of Parliament.

A member, during and after leaving public office, must not use her/his influence as a member to obtain appointment, promotion, advancement, transfer or any other advantage or benefit on behalf of herself/himself or other persons.

A member must not appoint their spouse, domestic partner or close relative to a position in her/his own office.

A member must not receive any fee, payment, retainer or reward, or permit any compensation to accrue to his or her beneficial interest, for or on account of, or as a result of, his or her position as a Member, other than compensation to which they are entitled as a Member of Parliament.

Use of official information

A member makes appropriate use of official information strictly for the purpose of performing her/his role as a Member of Parliament in the best interests of the public.

A member must protect confidential and official information in her or his possession or knowledge, and only release it if she or he has the authority to do so.

A member, during and after leaving public office, must not use official information which is not in the public domain, or information obtained in confidence in the course of her/his official duties or position, for the advantage or benefit of themselves or other persons.

Use of public resources

A member uses public resources strictly for the purpose of performing her/his role as a Member of Parliament, and in accordance with any rules and guidelines regarding the use of those resources and assets.

A member must not use public resources, or allow such resources to be used by others, for personal advantage or benefit.

A member must be scrupulous in ensuring the legitimacy and accuracy of any claim they make on the public purse.

Gifts and benefits

A member adheres to the highest standards of transparency and accountability in relation to offers of gifts or benefits, and carries out her/his duties as a Member of Parliament without being influenced by personal gifts or benefits.

A member must not solicit, encourage or accept gifts, benefits or favours which may improperly influence the member in the exercise of her/his duties, or may give the appearance of improper influence.

Exceptions to this are incidental gifts or customary hospitality of nominal value.

A member must declare gifts and benefits received in connection with her/his official duties as required by the Parliamentary (Disclosure of Interests) Act 1996.

Accuracy of statements

A member makes statements in Parliament and in public that are accurate and honest.

A member must not intentionally or unintentionally mislead Parliament or the public in statements they may make.

A member is obliged to correct the Parliamentary record or the public record in a manner that is appropriate to the circumstances as soon as possible after any incorrect statement is made.

Outside employment

A member carefully manages employment outside of Parliament to ensure that any such employment does not interfere with her/his duties as a Member of Parliament.

A member must not engage in any employment outside Parliament that involves a substantial commitment of time and effort such as to interfere with their duties as a member.

Parliamentary conduct

A member conducts herself/himself in Parliament in ways that will protect the public interest, and enhance public confidence and trust in Parliament.

A member must observe proper standards of parliamentary conduct.

A member must take particular care to consider the rights and reputations of others before making use of the unique protection available under parliamentary privilege. This privilege should never be used recklessly or without due regard for accuracy.

FURTHER INFORMATION

Advice for Members

Members may seek confidential advice from the Parliamentary Standards Commissioner as to any matter arising under this Code.

Guidance notes

Guidance notes may be developed to accompany the Code. The notes should address specific terms in the Code that require clarification to guide members in the achievement of the standards in the Code.

The notes may also identify other legislation or parliamentary policies or procedures that may require consideration by members and Parliament in implementing the Code.

Breaches of the Code

A breach of this Code will also constitute a breach of Standing Orders able to be dealt with by the Chamber concerned. In dealing with any breach of the Code, consideration may be given to any Guidance notes accompanying the Code for definition or clarification of specific terms contained within the Code.

Status and review of the Code

This Code was adopted by Parliament on XX (MONTH) 20XX and is operational from this date.

The Code will be reviewed every four years by the Parliamentary Joint Standing Committee on Integrity. It will next be reviewed on XX (MONTH) 20XX.³

3 INQUIRY/SUBMISSIONS

- 3.1 On 19 September 2016, the Committee invited Members of both Houses as well as Rev. Prof. Michael Tate (AO), Parliamentary Standards Commissioner, to comment on the draft Code of Conduct.
- 3.2 Responses were received from the following:-
- Hon. Premier Will Hodgman MP, on behalf of the Parliamentary Liberal Party;
 - Mr. Bryan Green MP, on behalf of the Parliamentary Labor Party;
 - Ms. Rosalie Woodruff MP, on behalf of the Tasmanian Greens; and
 - Rev. Prof. Michael Tate (AO).

Submissions can be found at Appendix B.

- 3.3 A précis of the submissions is as follows:-

Premier Hon. Will Hodgman MP

- Stated “The Government notes that two separate Codes of Conduct already exist in the House of Assembly Standing Orders, and in-principle one code of conduct for all Parliamentarians is the preferred option.”
- Noted “...the Government would be pleased to make a further, more detailed submission on a single Code of Conduct for all Parliamentarians.”

Mr. Bryan Green MP

- Stated that “The Parliamentary Labor Party (PLP) supports the introduction of a Code of Conduct for both the House of Assembly and Legislative Council.”

³ Review of Codes of Conduct for Members of Parliament, Ministers and Ministerial Staff, Summary Report, Appendix A

- Noted “there is currently no Code of Conduct for Members of the Legislative Council, while the Code of Ethical Conduct within the Standing Orders for the House of Assembly has not been updated for some time.”
- Supports the Revised Draft Code of Conduct as circulated with the following changes:
 - The Code should include a clause similar to that in the Ministerial Code of Conduct relating to respect of persons.⁴
 - The process for the handling of complaints and consequences for breaches requires clarification. He expressed concern that the Draft’s proposal for dealing with complaints would enable a majority Government to easily sweep aside a matter concerning a Government Member.
 - He recommended that guidelines should be provided in relation to the complaints process and for the inclusion of complaints to be escalated to the Integrity Commission if complaints cannot be resolved by the Parliament.
 - The Parliamentary Standards Commissioner could be empowered to play a greater role in overseeing the Parliamentary Code of Conduct.

Ms Rosalie Woodruff MP

- Noted a Model Code of Conduct for Members of Parliament was presented to the Parliament by the Integrity Commission in June 2011.
- Stated that the Tasmanian Greens support the introduction of a Code of Conduct.
- Concurred with the Integrity Commission’s view that well-developed codes of conduct motivate elected members and public officers to act ethically, because codes shape ethical behaviour and the consequences of failing to act ethically.

⁴ “Ministers are to treat everyone with respect, courtesy and in a fair and equitable manner without harassment, victimization or discrimination”;

- Stated that the case in favour of a Code is settled and Parliament must ensure Members are bound by a Code that directs them in how to ethically discharge their duties.
- Noted the existing House of Assembly Code does not meet best practice, as highlighted by the Integrity Commission's key findings, including:

“... some areas of ethical complexity are not currently addressed separately, such as outside employment, misleading statements and duties as a member of Parliament; no guidance is provided to assist Members of Parliament in complying with a code's requirements; there is insufficient attention to the concept of 'public interest' within the current House of Assembly code; and many provisions require greater clarification.”

- Given the drawn-out history of the consideration of a Code of Conduct for Parliamentarians, urged the Committee to recommend a near-term timeframe for the implementation of the Code.

Rev. Prof. Michael Tate (AO), Parliamentary Standards Commissioner

- Supported the Revised Draft Code, noting that it was “a more suitable Draft” than the original code proposed by the Integrity Commission.
- Endorsed Recommendation 29 of the Independent Reviewer of the Integrity Commission Act 2009, the Hon. William Cox AO, which reads: “That consideration be given to the adoption of the Model Codes of Conduct for Members of Parliament... presented to the Parliament by the Commission in June 2011.”
- Noted that the Hon. William Cox AO, prefaced Recommendation 29 by noting at 3:18:8 that it is a matter “of more immediate concern” than some other issues.
- Rev. Prof. Michael Tate (AO) then commented “this seems to indicate the Chambers of Parliament should give some priority to their consideration of this matter” and he continued by saying “... the moment for decision has come.”

4 FINDINGS

The Committee finds:

- 4.1 The introduction of a Code of Practice for Members of Parliament was originally proposed by the Integrity Commission in 2011 and any further delay in finalizing the issue is unacceptable.
- 4.2 The Standing Orders of the House of Assembly includes a Code of Ethical Conduct and a Code of Race Ethics.
- 4.3 All respondents endorsed the introduction of a Code of Conduct for Members of both Houses of Parliament.
- 4.4 A number of respondents:
 - stressed a need for a Code of Conduct to be introduced in a timely manner;
 - believed that a Code of Conduct is important for maintaining public confidence in Members of Parliament; and,
 - supported the Draft Code of Conduct proposed by the Integrity Commission with suggested additions.
- 4.5 The Government, not the Parliament, is responsible for the Ministerial Code of Conduct, therefore it is not within the Committee's power to review the Ministerial Code.
- 4.6 There is no mechanism for referring potential breaches of a code of conduct that cannot be resolved by the respective House of Parliament to the Integrity Commission.
- 4.7 The Parliamentary Standards Commissioner is permitted by the *Integrity Commission Act 2009* to provide confidential advice to Parliamentarians on ethical issues.
- 4.8 The Parliamentary Standards Commissioner can also advise the Integrity Commission on ethical matters relating to Members of Parliament, including training and codes of conduct.
- 4.9 Guidelines have not been developed to accompany the Draft Code of Conduct.

5 RECOMMENDATIONS

- 5.1 The Parliament adopt a single Code of Conduct for all Members of both Houses of Parliament and the Draft Code of Conduct be the basis of the single Code of Conduct.

- 5.2 The Presiding Officers and Party Leaders meet to discuss the wording of the Code in an attempt to gain consensus on the wording of the Code.
- 5.3 The Code be debated by both Houses of Parliament prior to the end of the Autumn session of Parliament in 2017.
- 5.4 Once a Code of Conduct has been adopted by both or either House of Parliament the Integrity Commission develop guidelines to assist with the application of the Code.
- 5.5 That the Integrity Commission Act 2009 be amended to enable the Integrity Commission to investigate complaints referred by at least three Members of Parliament into breaches of the Code following examination by the House.

**Parliament House
HOBART
15 November 2016**

**Hon. Ivan Dean MLC
CHAIRPERSON**

DISSENTING STATEMENT OF MR TONY MULDER, MLC FOR RUMNEY

Recommendation 5.1 moved:

The Parliament adopt a single Code of Conduct for all Members of both Houses of Parliament and the Draft Code of Conduct be the basis of the single Code of Conduct.

I do not believe that an MP Code of Conduct is appropriate, particularly if it mandates standards of behaviour that are above that of ordinary citizens. Many matters covered by the Draft Code are perceptions in the eye of the beholder, rather than the intention of the perpetrator.

In the adversarial atmosphere of Parliament, allegations of misconduct are open to political mischief. Members who feel they have been aggrieved are afforded the protection of Parliamentary Privilege with the ultimate arbiter of appropriate conduct being the spotlight of public disclosure.

Behaviour inside a House of Parliament is regulated by the Standing Orders, as required by the Tasmanian Constitution. No other compulsory code should, or I believe can, be prescribed. The House of Assembly in particular would grind to a halt unless the Draft Code were to use Question Time as the standard of behaviour.

The content of the proposed Codes' should be considered (and named) *Guidelines* with the idea that they are desirable standards, but not things to be breached. Breaching a code implies that complaints will be investigated and determined and that sanctions will follow.

If the Codes are to be adopted, they should be adopted voluntarily by members and not mandated.

Recommendation 5.5 moved:

That the Integrity Commission Act 2009 be amended to enable the Integrity Commission to investigate complaints referred by at least three Members of Parliament into breaches of the Code following examination by the House.

I dissent from the above recommendation. If adopted, it would turn what ought to be minor matters into the equivalent of statutory offences. Parliament must retain sovereignty and cannot have an external agency investigating matters that are not part of the common or statutory law.

If the recommendation were to be adopted, there should also be a statutory offence for Members, under privilege or otherwise, to publicly comment on a matter which is, or is proposed to be under investigation.

The severity of inappropriate conduct should be determined by its lawfulness. Conduct that is unlawful is adequately catered for by the independent investigative bodies and the judiciary that already exist.

The idea of having non-statutory conduct codes is to enable members to apologise and move on. If matters could be referred on an apology would be an admission of guilt. There should also be a requirement for the recipient to accept such an apology irrespective of their perceptions of its sincerity.

**Parliament House
HOBART
15 November 2016**

**Tony Mulder MLC
Member for Rumney**

DISSENTING STATEMENT OF MR MARK SHELTON MP, LIBERAL MEMBER FOR LYONS

Recommendation 5.5:-

That the Integrity Commission Act 2009 be amended to enable the Integrity Commission to investigate complaints referred by at least three Members of Parliament into breaches of the Code following examination by the House.

I dissent from the above recommendation.

If a code of conduct is introduced to both Houses of Parliament then it should be the houses of parliament that preside over that code i.e. the Privileges Committee. A recommendation that allows just three members of Parliament to refer a complaint to the integrity commission would simply add more politics.

If adopted, this recommendation could encourage a flurry of mischievous referrals to the integrity commission restricting the commission's ability to handle other complaints and hindering the performance of our Parliament.

Additional comments

Recommendation 5.1:-

notes that the House of Assembly Standing and Sessional Orders currently lists two codes, the code of ethical conduct of the members of the house, with a statement of commitment and the declaration of principles along with a code of race ethics for members of the house.

With the introduction of a single code of conduct for members of both houses it should be stated that within the process the two current codes are superseded.

**Parliament House
HOBART
15 November 2016**

**Mark Shelton MP
Member for Lyons**

SCHEDULE 1 – LIST OF DIVISIONS

In accordance with s23(6) and Schedule 5(2) of the Integrity Commission Act, the following divisions were recorded:

1. Recommendation 5.1 moved:

“The Parliament adopt a single Code of Conduct for all Members of both Houses of Parliament and the Draft Code of Conduct be the basis of the single Code of Conduct.” (Mr Dean)

Question put that the Recommendation be agreed to;

The Committee divided.

Ayes:	Noes:
Mr Dean	Mr Mulder
Mr Gaffney	
Ms Giddings	
Mr Shelton	
Ms Woodruff	

It was resolved in the affirmative.

2. Recommendation 5.2 moved:

“The Presiding Officers and Party Leaders meet to discuss the wording of the Code in an attempt to gain consensus on the wording of the Code.” (Ms Giddings)

Question put that the Recommendation be agreed to;

It was resolved in the affirmative.

3. Recommendation 5.3 moved:

“The Code be debated by both Houses of Parliament prior to the end of the Autumn session of Parliament in 2017.” (Ms Giddings)

Question put that the Recommendation be agreed to;

The Committee divided.

Ayes:	Noes:
Mr Dean	Mr Shelton
Mr Gaffney	
Ms Giddings	
Mr Mulder	
Ms Woodruff	

4. Recommendation 5.4 moved:

“Once a Code of Conduct has been adopted by both or either House of Parliament the Integrity Commission develop guidelines to assist with the application of the Code.” (Mr Dean)

Question put that the Recommendation be agreed to;

It was resolved in the affirmative.

5. Recommendation 5.5 moved:

“That the Integrity Commission Act 2009 be amended to enable the Integrity Commission to investigate complaints referred by at least three Members of Parliament into breaches of the Code following examination by the House.” (Ms Giddings)

Question put that the Recommendation be agreed to;

The Committee divided.

Ayes:

Mr Dean

Mr Gaffney

Ms Giddings

Ms Woodruff

Noes:

Mr Mulder

Mr Shelton

It was resolved in the affirmative.

APPENDICES

APPENDIX 'A'

Review of Codes of Conduct for Members of Parliament, Ministers and Ministerial Staff

Summary Report

Prepared for the Joint Standing Committee on Integrity

24 May 2016

1. Introduction

- 1.1. This Summary Report provides an update on the status of codes of conduct for Members of Parliament, Ministers and Ministerial staff. It is provided in response to a request from the Joint Standing Committee on Integrity ('JSC') that the Integrity Commission ('the Commission') undertake such a review.
- 1.2. The Summary Report provides an overview of the Commission's original report on the issue: *Codes of Conduct for Members of Parliament, Ministers and Ministerial Staff in Tasmania* (2011) ('the 2011 report'), and a detailed review of the draft Code of Conduct for Members of Parliament ('the draft MPs Code').

2. Background

- 2.1. A key function of the Commission is to '*review, develop and monitor the operation of any codes of conduct and guidelines that apply to Members of Parliament*'.¹
- 2.2. The issue of codes of conduct for MPs, Ministers and Ministerial staff was raised by the Commission in the 2011 report. The report contained model draft codes of conduct for each of the above groups, and recommended that each House of Parliament adopt the relevant code for that House, and that the State Government adopt the codes for Ministers and Ministerial staff.²
- 2.3. Since that time, a Code of Conduct for Ministers was issued by the then Premier in 2012. The code reflected the model provisions proposed by the Commission, and included associated policy on gifts and benefits and detailed guidance notes. In 2014, the current Premier re-issued the code and associated documentation. The Commission is generally pleased with the Ministerial Code however notes that a review of the Code is warranted.
- 2.4. The Commission released an update report on codes of conduct in December 2015: *Enhancing Accountability Mechanisms for Members of Parliament and Ministerial Staff: a progress update* ('the 2015 update report'). This report served as a reminder and a prompt for further action by Parliament and the Government.
- 2.5. The Commission has consulted with the Parliamentary Standards Commissioner, the Reverend Professor Michael Tate, in considering the 2011 report and in developing the revised draft MPs Code.

3. Consideration of the 2011 Report

- 3.1. The Commission has considered the 2011 report in the preparation of this Summary Report. We have not however undertaken a detailed review of all aspects of that report and do not propose to release a revised version.
- 3.2. The Commission considers that the 2011 report remains a solid and well-crafted document that the can be relied upon with confidence. In broad terms, it is considered that there is little that can be meaningfully added to the discussion and recommendations in that document.

¹ *Integrity Commission Act 2009*, s 30(c).

² Integrity Commission, *Codes of Conduct for Members of Parliament, Ministers and Ministerial Staff in Tasmania* (2011), 157.

- 3.3. The work on what constitutes an effective code (chapter 7 of the 2011 report) is very much in-line with what the Commission subscribes to now. From our experience in other parts of the public sector (such as local government), the advice in the report should continue to be followed. There are however some aspects of good practice that have further developed and could be applied to the draft codes:
- Further emphasising that codes of conduct should build upon and reflect organisational values and principles. To a degree, this is embodied (in the MPs and Ministerial codes) by the 'Statement of commitment' that follows the Preamble; however the Commission considers that this should be re-framed and revised as a 'Statement of values'.
 - Each ethical standard should contain a core ethical, or 'principle', statement. This sets the aspirational target of the respective standard, and should be framed in the positive ie what MPs and Ministers seek to achieve, rather than what they must not do. This approach has been utilised in the recently enacted Code for Local Government elected representatives and would not change the intent of the ethical statements.
 - The 'principle' statement in each standard should be presented in a bolder format. This will assist to keep the ethical statement clear and concise, and differentiate them from the supporting 'behavioural' statements.
 - The supporting 'behavioural' statements within each ethical standard should also be framed in the positive where possible, accepting that some 'must not...' statements may be necessary.
- 3.4. The 2011 report recommends guidance information be included to support each code, and such guidance has been issued in association with the Code of Conduct for Ministers. The Commission continues to support this approach however notes that this information must not usurp the code itself, should be concise, and point to relevant sources of information and procedure.
- 3.5. The Commission's 2015 update report notes the essential work that needs to be undertaken in other related areas to complement the codes of conduct and to ensure robust and integrated ethical framework. This work needs to be coordinated and in-tandem with the review and release of any codes of conduct for MPs and Ministers.

4. Review of Draft Code Conduct for Members of Parliament

- 4.1. The revised draft MPs Code is presented for consideration and discussion by the JSC, and members of each House of Parliament.
- 4.2. The revised draft code is provided in Attachment A of this Summary Report. Explanatory notes for the modifications to the draft MPs Code are provided in Attachment B. The draft MPs Code as originally proposed in the 2011 report is provided in Attachment C.
- 4.3. The revisions have been undertaken in accordance with the suggested changes outlined in cl 3.3 of this Summary report (above), based upon current good practice and the Commission's experience in developing codes of conduct throughout the public sector.
- 4.4. The Commission, in consultation with Rev Prof Tate, considers that there do not exist any new emerging areas of ethical risk that would warrant the removal or addition of new ethical standards within the draft code.
- 4.5. It is noted that further work is required to prepare suitable Guidance notes to accompany the draft MPs Code. These notes are required to further define and clarify terms used in the code eg 'close relative' (Use of public office), 'associate' (Conflict of interest), 'nominal value' (Gifts and benefits).

5. Code of Conduct for Ministers

- 5.1. The JSC has requested that the Commission review the Ministerial Code, given it has been in place for some time now.

- 5.2. The Commission has been unable to undertake this review within its current resources. It is considered that the review should be undertaken in consultation with the Government and the Department of Premier and Cabinet, and the Parliamentary Standards Commissioner. The Commission is happy to lead this process.
- 5.3. It is noted that many of the proposed revisions to the draft MPs Code will be applicable to the Ministerial code, recognising that the Ministerial code has additional ethical standards that are specific to the Ministerial role.

6. Draft Code of Conduct for Ministerial Staff

- 6.1. The Commission has not considered the draft Code of Conduct for Ministerial Staff.

- 6.2. The Commission's 2015 update report states:

[30] As was the case in 2011, instruments of appointment for Tasmanian ministerial staff refer to a 'standard of conduct' and contain comprehensive requirements that reflect the wording of the State Service Code of Conduct.³ On the election of the current government, a new code for ministerial staff was presented by the Department of Premier and Cabinet for consideration. However, the government has continued to use the existing standard contained within the instruments of appointment. The instruments are administered by the Premier's Chief of Staff; they are not publicly available.

[31] The Commission considers that a system in which the form of the code is unknown to the public, and in which the administration of such a code is largely invisible, is not transparent. A publicly available, stand-alone, code of conduct would facilitate oversight by the Commission and other relevant bodies, and also the general public.

...

[34] Beside Tasmania, there are three Australian jurisdictions that do not have publicly available codes for ministerial staff.⁴

- 6.3. The Commission notes that the Government has stated that '*[t]he ministerial staff conduct requirements will now be publically available to view on the Department of Premier and Cabinet website, in line with the Integrity Commission's recommendation*'.⁵ The Commission has been unable to confirm whether this has occurred.
- 6.4. Any further review of the current Instruments of Appointment and the Commission's proposed code of conduct should be undertaken in consultation with the Government and the Department of Premier and Cabinet. The Commission is happy to lead this process.

7. Conclusion

- 7.1. The Commission has undertaken a detailed review of the draft Code of Conduct for Members of Parliament. This is provided for the consideration and action of the JSC and members of either House of Parliament.
- 7.2. Further work is required to develop associated Guidance notes to define and clarify terms used in the Code, and to consider other relevant legislation eg *Parliamentary (Disclosure of Interests) Act 1996*.
- 7.3. Further consultation is required as part of any review of the codes relating to Ministers and Ministerial staff. The Commission is happy to lead this process.

³ See *State Service Act 2000* (Tas) s 9.

⁴ Integrity Commission, *Enhancing Accountability Mechanisms for Members of Parliament and Ministerial Staff: a progress update* (2015), 13.

⁵ Attorney-General, Dr Vanessa Goodwin, 18 December 2015: http://premier-dev.dpac.tas.gov.au/releases/integrity_commission_update_report.

Revised Draft Code of Conduct for Members of Parliament

Draft for Joint Standing Committee on Integrity

20 May 2016

Note: to be read in conjunction with Explanatory Notes (Attachment B)

PREAMBLE

Members of Parliament recognise that their actions have a profound impact on the lives of all Tasmanian people. Fulfilling their obligations and discharging their duties responsibly requires a commitment to the highest ethical standards to maintain and strengthen the democratic traditions of the State and the integrity of its institutions.

Compliance with the law is not always enough to guarantee an acceptable standard of conduct. Members must act not only lawfully, but also in a manner that will withstand the closest of public scrutiny. This Code has been developed for the guidance of all Members of Parliament. It sets out ethical standards and principles to assist members in observing the expected standards of conduct in public office and to act as a benchmark against which that conduct can be measured.

Neither the law nor this Code is designed to be exhaustive, and there will be occasions where members will find it necessary to adopt more stringent norms of conduct in order to protect the public interest, and to enhance public confidence and trust. In making choices about conduct, members should have regard to prevailing community values and standards. They should also, where possible, avoid giving unnecessary offence to groups in the community whose beliefs and views differ from the mainstream.

Members of Parliament are to promote and support this Code by leadership and example.

Statement of values

This Code is derived from the fundamental values of the institution of the Parliament in this State. By adopting and upholding this Code, all Members of Parliament share in and support these values.

As Members of Parliament, we value:

- the public interest and the fundamental objective of public office to act solely in terms of the public interest;
- the improvement of the economic and social conditions of all Tasmanian people, and our service to our fellow citizens to achieve this;
- the promotion of human, social and environmental welfare through the responsible execution of our official duties;
- integrity, honesty, accessibility, accountability, fairness, transparency, courtesy, respect and understanding;
- loyalty to shared principles, respect for differences, and fairness in political dealings to our fellow Members of Parliament; and
- ethical political practices that support the democratic traditions of our State and its institutions, and the rejection of political corruption.

ETHICAL STANDARDS

Conflict of interest

A member protects and upholds the public interest by taking all reasonable steps to avoid, disclose and manage any conflict of interest that arises, or is likely to arise, between her/his personal interests and her/his official duties.

A conflict of interest may be financial or non-financial. A conflict of interest may be potential, actual or perceived.

A conflict of interest does not exist where the member, their spouse or domestic partner, relative or associate is affected only as a member of the public or of a broad class of persons.

Each member is individually responsible for avoiding and managing conflicts of interest.

Declaration of personal interests

A member is personally responsible for full and accurate disclosure of her/his financial and other interests, particularly in accordance with their obligations under the *Parliamentary (Disclosure of Interests) Act 1996*.

Members who have a material interest in a matter being considered as part of their official duties must not vote or participate in discussions on that matter unless they have first declared their interest to Parliament, or in any other public and appropriate manner.

Use of public office

A member makes proper use of her/his office to represent and serve the community, conducting herself/himself in ways that maintain the trust and confidence of the public in the office of a Member of Parliament.

A member, during and after leaving public office, must not use her/his influence as a member to obtain appointment, promotion, advancement, transfer or any other advantage or benefit on behalf of herself/himself or other persons.

A member must not appoint their spouse, domestic partner or close relative to a position in her/his own office.

A member must not receive any fee, payment, retainer or reward, or permit any compensation to accrue to his or her beneficial interest, for or on account of, or as a result of, his or her position as a Member, other than compensation to which they are entitled as a Member of Parliament.

Use of official information

A member makes appropriate use of official information strictly for the purpose of performing her/his role as a Member of Parliament in the best interests of the public.

A member must protect confidential and official information in her or his possession or knowledge, and only release it if she or he has the authority to do so.

A member, during and after leaving public office, must not use official information which is not in the public domain, or information obtained in confidence in the course of her/his official duties or position, for the advantage or benefit of themselves or other persons.

Use of public resources

A member uses public resources strictly for the purpose of performing her/his role as a Member of Parliament, and in accordance with any rules and guidelines regarding the use of those resources and assets.

A member must not use public resources, or allow such resources to be used by others, for personal advantage or benefit.

A member must be scrupulous in ensuring the legitimacy and accuracy of any claim they make on the public purse.

Gifts and benefits

A member adheres to the highest standards of transparency and accountability in relation to offers of gifts or benefits, and carries out her/his duties as a Member of Parliament without being influenced by personal gifts or benefits.

A member must not solicit, encourage or accept gifts, benefits or favours which may improperly influence the member in the exercise of her/his duties, or may give the appearance of improper influence. Exceptions to this are incidental gifts or customary hospitality of nominal value.

A member must declare gifts and benefits received in connection with her/his official duties as required by the *Parliamentary (Disclosure of Interests) Act 1996*.

Accuracy of statements

A member makes statements in Parliament and in public that are accurate and honest.

A member must not intentionally or unintentionally mislead Parliament or the public in statements they may make.

A member is obliged to correct the Parliamentary record or the public record in a manner that is appropriate to the circumstances as soon as possible after any incorrect statement is made.

Outside employment

A member carefully manages employment outside of Parliament to ensure that any such employment does not interfere with her/his duties as a Member of Parliament.

A member must not engage in any employment outside Parliament that involves a substantial commitment of time and effort such as to interfere with their duties as a member.

Parliamentary conduct

A member conducts herself/himself in Parliament in ways that will protect the public interest, and enhance public confidence and trust in Parliament.

A member must observe proper standards of parliamentary conduct.

A member must take particular care to consider the rights and reputations of others before making use of the unique protection available under parliamentary privilege. This privilege should never be used recklessly or without due regard for accuracy.

FURTHER INFORMATION

Advice for Members

Members may seek confidential advice from the Parliamentary Standards Commissioner as to any matter arising under this Code.

Guidance notes

Guidance notes may be developed to accompany the Code. The notes should address specific terms in the Code that require clarification to guide members in the achievement of the standards in the Code.

The notes may also identify other legislation or parliamentary policies or procedures that may require consideration by members and Parliament in implementing the Code.

Breaches of the Code

A breach of this Code will also constitute a breach of Standing Orders able to be dealt with by the Chamber concerned. In dealing with any breach of the Code, consideration may be given to any Guidance notes accompanying the Code for definition or clarification of specific terms contained within the Code.

Status and review of the Code

This Code was adopted by Parliament on XX (MONTH) 20XX and is operational from this date.

The Code will be reviewed every four years by the Parliamentary Joint Standing Committee on Integrity. It will next be reviewed on XX (MONTH) 20XX.

Explanatory Notes: Revisions to the Draft Code of Conduct for Members of Parliaments

Preamble

- Largely unchanged, however some sentences have been moved from the original 'Statement of Commitment' to this section to assist with the overall flow of the messages within the Code.
- One new sentence ('Appropriate guidance notes ...') has been inserted into the second paragraph to make the connection between the Code and other subsidiary notes and policies that may be required to help define the standards provided in the Code.
- The two final paragraphs of the original Preamble have been moved to the 'Further information' section at the end of the document.

Statement of values

- This section is now provided as a sub-section of the Preamble. This effectively provides a cover page outlining the reasoning for the Code and members' responsibilities under the Code.
- 'Statement of values' replaces the previous heading of 'Statement of commitment'. This better reflects the reliance on values and principles in the Code.
- The first paragraph has been inserted to introduce the values, and to link them to Parliament.
- The dot-point list contains all of the statements from the original Code, with some re-ordering and re-framing as 'positive' values.

Ethical standards

- 'Ethical standards' replaces the previous heading of 'The Code' to reflect the standards to be achieved by members.
- All of the topics from the original Code are retained, with variation to the text as outlined below.
- To enhance the principles-based approach, each topic now includes:
 - A 'principle statement' (in bold): this provides the aspirational standard, and is framed in the positive; followed by
 - 'Behavioural statements': these guide member behaviour and provide what members must/must not do.

This approach reflects current good practice in codes of conduct, and is based upon research into other successful codes. It also reflects the approach taken with the recent code of conduct for Local Government elected members, as enacted by the State Government.

Conflicts of interest

- A new paragraph ('A conflict of interest may be ...') has been inserted to explain the nature of conflicts of interest.

Use of public office

- The previous heading of 'Improper Advantage' has been broken into two sections: 'Use of public office' and 'Use of official information', given these are two discrete areas of risk and conduct. These headings have been framed in the 'positive'.
- The new principle statement has been inserted based upon the relevant values ie maintaining public trust and confidence.

Use of official information

- The new principle statement has been inserted based upon the relevant values ie using information in the best interests of the public.

- A new behavioural statement ('A member must protect confidential and official information ...') has been inserted to address the standard behaviour for releasing confidential or official information.

Use of public resources

- The principle statement has been inserted based upon text contained in the original Code.

Gifts and benefits

- The new principle statement has been inserted based upon the relevant values ie acting in the best interests of the public.

Accuracy of statements

- The heading has been re-framed in the positive.
- The new principle statement has been inserted based upon the relevant values ie accuracy and honesty.

Outside employment

- The new principle statement has been inserted based upon the relevant values ie non-interference with the member's duties.

Parliamentary conduct

- New heading to replace 'Duties as a Member of Parliament'
- The new principle statement has been inserted based upon the relevant values ie protection of the public interest.

Further information

- New heading to replace 'Procedures'

Advice for members

- Text moved from Preamble of original Code.

Guidance information

- New section added to reference possible Guidance notes (as recommended in the 2011 report) to define specific terms used in the Code, and the need to consider other legislation, or parliamentary policies or procedures.

Breaches of the Code

- Text moved from Preamble of original Code.
- New sentence added ('In dealing with any breach of the Code ...') to explicitly link the Code and any Guidance notes containing definitions or clarifications of terms contained in the Code.

Status and review of Code

- New heading, using existing text.

Original Draft Code of Conduct for Members of Parliament (2011)

Preamble

Members of Parliament should recognise that their actions have a profound impact on the lives of all Tasmanian people. Fulfilling their obligations and discharging their duties responsibly requires a commitment to the highest ethical standards to maintain and strengthen the democratic traditions of the State and its Institutions.

Merely avoiding breaking the law will not always be enough to guarantee an acceptable standard of conduct. Members of Parliament must act not only lawfully but also in a manner that will withstand the closest public scrutiny. Neither the law nor this Code is designed to be exhaustive, and there will be occasions on which Members will find it necessary to adopt more stringent norms of conduct in order to protect the public interest and to enhance public confidence and trust. In making choices about conduct Members should have regard to prevailing community values and standards. They should also, where possible, avoid giving unnecessary offence to groups in the community whose beliefs and views differ from the mainstream.

As Members of Parliament should promote and support this Code by leadership and example.

Members may seek confidential advice from the Parliamentary Standards Commissioner as to any matter arising under this Code.

A breach of this Code will also constitute a breach of Standing Orders able to be dealt with by the Chamber concerned.

Statement of Commitment

To the people of this State, we owe the responsible execution of our official duties, in order to promote human, social and environmental welfare.

To the people of this State, we owe honesty, accessibility, accountability, fairness, transparency, courtesy, respect and understanding.

To our fellow Members of Parliament, we owe loyalty to shared principles, respect for differences, and fairness in political dealings.

We believe that the fundamental objective of public office is to act solely in terms of the public interest: to serve our fellow citizens with integrity in order to improve the economic and social conditions of all Tasmanian people.

We reject political corruption and will refuse to participate in unethical political practices which tend to undermine the democratic traditions of our State and its Institutions.

This Code has been developed for the guidance of all Members of Parliament. It sets out principles to assist Members in observing the expected standards of conduct in public office and to act as a benchmark against which that conduct can be measured.

Conflict of Interest

So as to protect and uphold the public interest, Members must take reasonable steps to avoid, resolve or disclose any conflict of interest, financial or non-financial, that arises or is likely to arise, between their personal interests and their official duties.

Members are individually responsible for preventing conflicts of interest.

A conflict of interest does not exist where the Member, their spouse or domestic partner, relative or associate is affected only as a member of the public or of a broad class of persons.

Declaration of Personal Interests

Members are personally responsible for disclosing their financial and other interests in accordance with their obligations under the *Parliamentary (Disclosure of Interests) Act 1996*.

Members who have a material interest in a matter being considered as part of their official duties must not vote or participate in discussions on that matter unless they have first declared their interest to Parliament, or in any other public and appropriate manner.

Improper Advantage

Members, during and after leaving public office, must not use their influence improperly in order to obtain appointment, promotion, advancement, transfer or any other advantage or benefit on behalf of themselves or another person or persons.

Members, during and after leaving public office, must not use official information which is not in the public domain, or information obtained in confidence in the course of their official duties or position, for the advantage or benefit of themselves or another person or persons.

Members must not appoint their spouse, domestic partner or close relative to a position in their own office.

Members must not receive any fee, payment, retainer or reward, nor shall he or she permit any compensation to accrue to his or her beneficial interest for or on account of, or as a result of, his or her position as a Member, other than compensation to which they are entitled as Members of Parliament.

Improper Use of Public Resources

Members must not use public resources, or allow such resources to be used by others, for personal advantage or benefit.

Members must use and manage public resources in accordance with any rules and guidelines regarding the use of those resources.

Members must be scrupulous in ensuring the legitimacy and accuracy of any claim they make on the public purse.

Gifts and Benefits

Members must not solicit, encourage or accept gifts, benefits or favours which may give the appearance of an attempt to improperly influence the Member in the exercise of his or her duties, except for incidental gifts or customary hospitality of nominal value.

Members must declare gifts and benefits received in connection with their official duties as required by the *Parliamentary (Disclosure of Interests) Act 1996*.

Misleading Statements

Members must not intentionally or unintentionally mislead Parliament or the public in statements they make and Members are obliged to correct the Parliamentary or the public record in a manner that is appropriate to the circumstances as soon as possible after any incorrect statement is made.

Outside Employment

Members must not engage in any outside employment that involves a substantial commitment of time and effort such as to interfere with their duties as Members of Parliament.

Duties as a Member of Parliament

Members observe proper standards of parliamentary conduct and must take particular care to consider the rights and reputations of others before making use of the unique protection available under parliamentary privilege. This privilege should never be used recklessly or without due regard for accuracy.

PROCEDURE

This Code was adopted by Parliament on XX MONTH 2011 and is operational from this date. This Code will be reviewed every four years by the Parliamentary Joint Standing Committee on Integrity. It will next be reviewed on XX MONTH 2015.

APPENDIX ‘B’



PREMIER OF TASMANIA

Hon Ivan Dean MLC
Member for Windermere
Chair, Joint Standing Committee on Integrity
Email: todd.buttsworth@parliament.tas.gov.au


Dear Mr Dean

I write regarding your Memorandum on the Code of Conduct for Members of Parliament, and am pleased to provide the Government's initial submission to the Joint Standing Committee on Integrity on this matter.

Please consider the following points on behalf of the Tasmanian Government:

- The Government values transparency and a clear and understandable Code of Conduct for Parliamentarians is an important element to ensuring faith and accountability.
- The Government has already introduced a number of initiatives to improve Government transparency including the publishing of gifts registers, introduction of publishing of Right to Information requests, and Routine Disclosure of Ministerial office expenditure.
- The Government notes that two separate Codes of Conduct already exist in the House of Assembly Standing Orders, and in principle one Code of Conduct for all Parliamentarians is the preferred option.
- That if the Committee does determine to adopt a single, uniform Code of Conduct for both Houses of Parliament, the Government would be pleased to make a further submission to the Committee on the details of the proposed Model Code as advocated by the Integrity Commission.
- That the Government notes that the Integrity Commission is satisfied that the publishing online of the "Behavioural Clause" of Ministerial Staff contracts addresses the issue of a Staff Code of Conduct.

Thank you for the opportunity to share the Government's position on this important matter. As mentioned above, the Government would be pleased to make a further, more detailed submission on a single Code of Conduct for all Parliamentarians should the committee determine to progress that option.

Kind regards.



Will Hodgman MP
Premier



HON BRYAN GREEN MP
LABOR LEADER

14 OCT 2016

Hon Ivan Dean MLC
Chair
Joint Standing Committee on Integrity

Dear Mr Dean

I write on behalf of the Parliamentary Labor Party in response to your letter regarding Codes of Conduct for Parliamentarians.

The Parliamentary Labor Party (PLP) supports the introduction of a Code of Conduct for members of both the House of Assembly and the Legislative Council.

It is noted that there is currently no Code of Conduct for members of the Legislative Council, while the Code of Ethical Conduct within the Standing Orders for the House of Assembly has not been updated for some time.

The introduction of a new Code would also be an opportune time to review the Ministerial Code of Conduct and update if necessary.

The PLP supports the contents of the Revised Draft Code of Conduct for Members of Parliament prepared by the Integrity Commission.

However, consideration should be given to the inclusion of a clause similar to that in the Ministerial Code of Conduct relating to respect for persons: "Ministers are to treat everyone with respect, courtesy and in a fair and equitable manner without harassment, victimisation or discrimination."

Tasmanians rightfully demand and expect that their elected representatives uphold the highest standards of ethical conduct. They also reasonably expect that breaches of the code will be treated seriously.

To that end, the process for handling complaints against the Code, and consequences for breaches, should be clarified.

The draft prepared by the Integrity Commission proposes that complaints be dealt with by the Chamber concerned. In the Lower House, where the government of the day holds a majority, the practical consequence is that complaints against government members can be easily swept aside.

Guidelines should be given about the process to be followed when complaints are made, including a potential escalation point to the Integrity Commission if complaints cannot be resolved by the Parliament.

The PLP submits that the Parliamentary Standards Commissioner could also be empowered to play a greater role in overseeing the Parliamentary Code of Conduct.

The Joint Standing Committee on Integrity should give consideration to mechanisms that would allow the Parliamentary Standards Commissioner to provide advice about breaches of the Code and suggested reparations and penalties, in confidence if necessary.

A strong Code of Conduct is of critical importance to maintaining public confidence in elected representatives and our political system.

Thank you to the Joint Standing Committee on Integrity for progressing this issue and for providing this opportunity for input.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Bryan Green', followed by a horizontal line and a period.

Bryan Green MP
Tasmanian Labor Leader



Rosalie Woodruff MP

Member for Franklin

Franklin Electorate office
7 Franklin Wharf, Hobart TAS 7000

Phone: (03) 6212 2228
Rosalie.Woodruff@parliament.tas.gov.au
tasmps.greens.org.au

14th October 2016

Honourable Ivan Dean MLC
Chair
Joint Standing Committee on Integrity
By email – todd.buttsworth@parliament.tas.gov.au

Dear Chair,

Re: Submission on Code of Conduct for Members of Parliament

The Tasmanian Greens welcome the opportunity to make a submission to the Joint Standing Committee on Integrity on the introduction to each House of a “Code of Conduct for Members of Parliament in Tasmania” (herein a “Code”).

The Greens are of the view that the need for a Code is settled. The case is well set out in the *Preamble* to the model *Code of Conduct for Members of Parliament* proposed by the Integrity Commission:

“Members of Parliament should recognise that their actions have a profound impact on the lives of all Tasmanian people. Fulfilling their obligations and discharging their duties responsibly requires a commitment to the highest ethical standards to maintain and strengthen the democratic traditions of the State and its Institutions.”

With this observation in mind, we agree with the findings of the Integrity Commission:

“... that well-developed codes of conduct motivate elected members and public officers to act ethically because codes provide guidance as to what constitutes ethical behaviour, and on the consequences of failing to act appropriately.”

We acknowledge the introduction of the Ministerial Code of Conduct in 2014 and the existing Code of Conduct for the House of Assembly. However, there remains no code of conduct provisions for non-Government members of the Legislative Council. This is unacceptable.

It is also highly undesirable that aspects of the House of Assembly Code continue to not meet best practice. In this respect, the Integrity Commission provides a number of examples in its key findings, including that:

“... some areas of ethical complexity are not currently addressed separately, such as outside employment, misleading statements and duties as a member of Parliament; no guidance is provided to assist Members of Parliament in complying with a code’s requirements; there is insufficient attention to the concept of ‘public interest’ within the current House of Assembly code; and many provisions require greater clarification.”

These are matters of immediate concern. It is apposite that members of the Committee acknowledge that the Model Code of Conduct for Members of Parliament was presented to the Parliament by the Integrity Commission in June 2011.

The demonstrated need for the Model Code is clear. We must not delay any longer in ensuring that all are bound by a Code that articulates their obligations, and directs them in how to ethically discharge their duties according to the expectations of the Tasmanian people we all represent.

Any further delay in adopting a Code of Conduct for Members of Parliament can no longer be justified.

Given the drawn-out history of the consideration of this Code, I would urge the Committee to include in its final recommendation a near-term timeframe for the implementation of the Code.

Sincerely,

A handwritten signature in black ink, appearing to read 'R Woodruff', with a stylized flourish at the end.

Dr Rosalie Woodruff MP
Greens Justice Spokesperson

26 September 2016

Hon. Ivan Dean MLC

Chair

Joint Standing Committee on Integrity

Dear Mr. Dean,

Thank you for your letter of 19 September 2016 inviting me to make a submission regarding the introduction to each Chamber of a Code of Conduct for Members of Parliament. My submission can be brief.

I endorse Recommendation 29 made by the Independent Reviewer of the Integrity Commission Act 2009, which reads: "That consideration be given to the adoption of the Model Codes of Conduct for Members of Parliament...presented to the Parliament by the Commission in June 2011".

Two observations may be made.

The first is that the Honourable William Cox, in his Report dated May 2016, did not have the advantage of considering the Revised Draft Code of Conduct for Members of Parliament presented to your Committee and dated 20 May 2016. (I support the Revised Draft Code, having had the opportunity to be consulted in its formulation). I cannot imagine that Mr Cox's Recommendation 29 would have been any different had he had time to peruse the Revised Code.

The second observation is that, whilst Recommendation 29 (3:18:10) is couched in properly respectful and differential terms, it is worth pointing out that Mr Cox prefaced that Recommendation by noting in 3:18:8 that it is a matter "of more immediate concern" than some other issues. Without putting words in his mouth, this seems to indicate that the Chambers of Parliament should give some priority to their consideration of this matter.

There has been a longish period to consider the merits of this proposal. For one point of view, this has resulted in a more suitable Draft emerging for consideration. From a complementary point of view, the moment for decision has come.

Yours Sincerely,
Michael Tate

Rev. Prof. Michael Tate AO

Parliamentary Standards Commissioner