Devon & Severn IFCA Inshore Fisheries and Conservation Authority

Standards of Performance, Conduct, and Behaviour Policy

For D&S IFCA Members

Version 0.2: August 2026

Contents

Version Control	
Date	**Comment**
Version 0.1 and 0.2 18th to 28th August 2026	Draft Policy developed by D&S IFCA's Senior Management Team.

1. Policy Statement

The Authority expects the highest standards of performance, conduct, and behaviour from its Members, and expects the highest possible standard of service, performance, and delivery. This includes sound and consistent decision making.

This policy applies to all D&S IFCA's Members, and a similar but separate Policy applies to all D&S IFCA's Officers. All D&S IFCA's Members are subject to this Policy and are responsible for ensuring that it is effective.

Every effort must be taken to attempt to maintain standards, and if required to secure performance improvement.

2. Setting and Achieving Standards

High standards of performance and delivery for the Authority are underpinned by the following:

2.1 Organisational:

a) Standards of Conduct applicable to all Members.
b) Production of an Annual Plan with clear and measurable goals.
c) Production of an Annual Report to measure success against the identified goals.
d) Recognising feedback on organisational performance from funding bodies including Defra and Local Authorities – for example the periodic IFCA Conduct and Operations Reports laid before Parliament by the Secretary of State (Defra).
e) Good governance with an open and transparent approach to delivery and decision making, and records of decision making.
f) Decision making based on best available evidence and advice where available from IFCA Officers and specialist bodies.
g) Publishing and maintaining an up to date record of declared interests, including pecuniary interests.
h) To embrace the Seven Principles of Public Life (Nolan Principles)

Nolan Principles

The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. This includes both elected and appointed IFCA's Members.

All public office-holders are both servants of the public and stewards of public resources.

The principles also apply to all those in other sectors delivering public services. The custodians of the Principles of Public Life are the Ethics and Integrity Commission.

Principle	Detail
1.1 Selflessness	Holders of public office should act solely in terms of the public interest.
1.2 Integrity	Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
1.3 Objectivity	Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
1.4 Accountability	Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
1.5 Openness	Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
1.6 Honesty	Holders of public office should be truthful.
1.7 Leadership	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.

2.2 Members:

High standards of performance and delivery by Members are underpinned by the following:

a) The Nolan Principles
b) An awareness and understanding of a range of external and internally produced information that assists Members in the delivery of their role, including but not limited to, the following:

Item/s	Content
Appointment Information (MMO Appointees)	This includes Terms and Conditions and requirements of conduct
Members Handbook	A broad overview of D&S IFCA's duties, area of operation, its core work, internal functions, how to self-seek information including policy documentation
Standing Orders	Procedural requirements
Terms of Reference	Specific role, function, and responsibilities for Sub-Committees and Working Groups
Schemes of Delegation	Broad roles and responsibilities including Authority, Chief Officer, Sub-Committees and Working Groups

Training Information	The content of training material, potentially specific to decision making. For example, attending training sessions (or reading produced training material) provided on Standing Orders, and training and familiarisation relating to D&S IFCA's byelaw related workstreams.

For all Authority Members to maintain their high standards the following applies:

All Members must:

1. Attend meetings, or provide apologies if unable to attend
2. Prepare for meetings by reading provided papers
3. Attend training sessions
4. Adhere to a dress code (Annex A)

For MMO Appointed Members, there are annual appraisals undertaken by the Chair of the Authority. These must be undertaken.

Support for Members

Officers can help to support Members to maintain their high standards of performance. Members are encouraged to contact Officers if they need explanations or additional information relating to Authority business or information that underpins their role as a Member.

3. Avoiding Poor Standards

3.1 Examples of Poor Standards

- Actions that may bring the organisation into disrepute
- Circulation of inaccurate information to stakeholders or Member to Member
- A failure to prepare for Authority and B&PSC meetings
- A failure to accept decisions, including majority decisions, made by the Authority or the Byelaw and Permitting Sub-Committee or any other sub-committee established by the Authority with delegated decision-making powers.
- Inappropriate use or handling of the organisation's equipment/property
- Minor breaches of confidentiality
- A failure to accept guidance or training
- Poor decision making

3.2 Examples of Gross Misconduct

- Theft, fraud, bribery, deliberate falsification of records
- Not declaring disclosable pecuniary interests
- Deliberate falsification of declarations of interest

- Providing false information in relation to an application to become a Member of the Authority
- Fighting, assault, or harassment, or causing alarm or distress
- Deliberate damage to Authority property or equipment
- Attending meetings, or conducting Authority business under the influence of alcohol or illegal substances and/or misuse of prescribed substances
- Criminal conviction and/or failure to disclose a criminal conviction
- Serious negligence which causes unacceptable loss, damage or injury
- Serious act of insubordination
- A sexual offence
- Serious breach of confidentiality
- Dishonesty
- Inappropriate use of computer and/or communications systems
- Making of vexatious allegations
- Discrimination, including bullying, harassment and victimisation on the grounds of age, race, sex, sexuality, disability, pregnancy or religious belief
- Serious breaches of health and safety and/or other policies and procedures which has placed the organisation, its employees or other members of the public at risk.
- Actions that may bring the organisation into serious disrepute
- Some examples of behaviour at work (e.g. bribery) may also constitute a criminal matter for the Member (under the Bribery Act 2010).

4. Decision Making

All D&S IFCA's Members are decision makers, and this has relevance to both Authority and Byelaw and Permitting Sub-Committee (B&PSC) meetings.

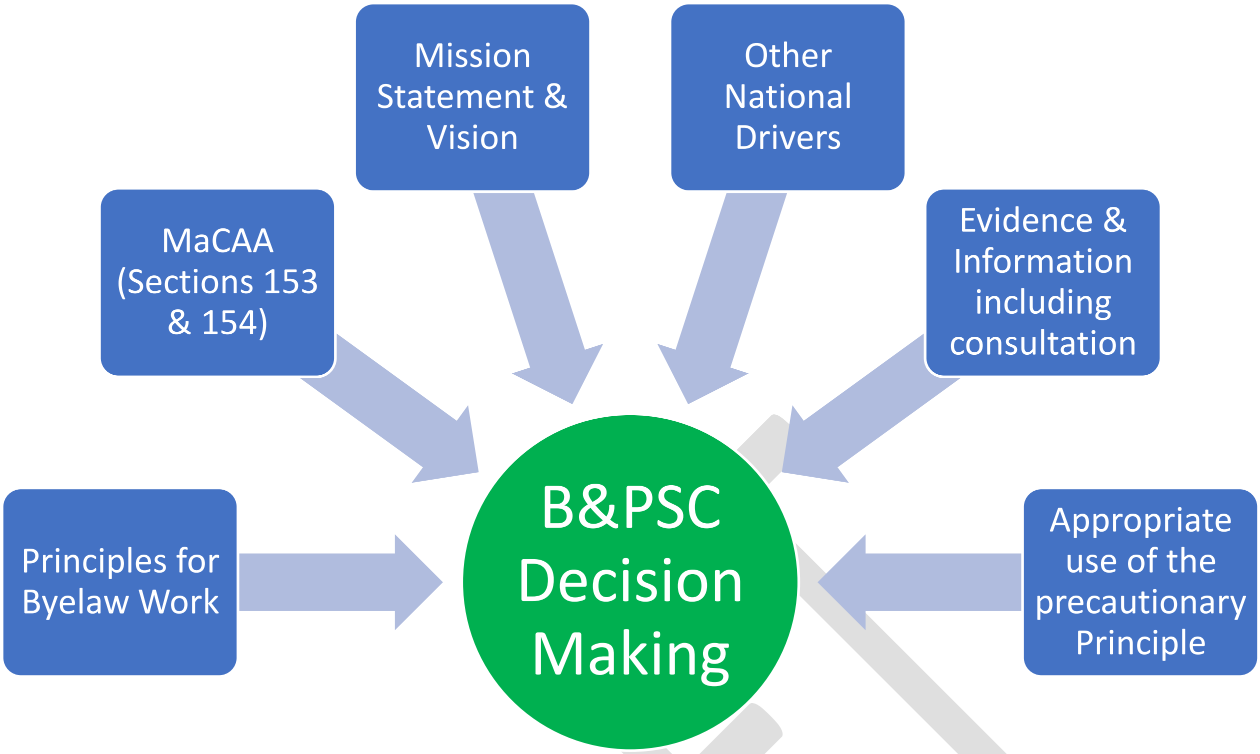
4.1 Officers' Papers

As the subject matter for both Authority and B&PSC meetings can be complex, Officers seek to provide best available evidence and expert opinion where required in Officers' papers and reports to assist Members in their decision making.

Recommendations are based upon a range of decision-making factors. Officers are able to expand upon the information as set out within the papers and reports if this is required.

In preparing reports and papers for Members, Officers will have regard to a range of material considerations, which may lead to a recommendation.

The process is shown on the following page:



Members may not agree with Officers' recommendations or advice offered, but the Officers' recommendations constitute specialist advice which enjoys an enhanced margin of appreciation and act as a basis for deliberation by the Authority or B&PSC.

4.2 Adherence to Policy

Where an IFCA has a policy, whether published or unpublished, it must adhere to that policy in its decision-making unless there are exceptional circumstances for departing from adherence to the policy.

The Supreme Court has set this principle of Administrative Law in Mandalia v Secretary of State for the Home Department [2015] UKSC 59. A very useful explanation of this principle can be found at:

https://publiclawandregulation.com/2016/09/30/the-duty-to-follow-policies-and-its-limits/

However, for convenience the following summary is based on this explanation:

" If a public body adopts a policy about how it will exercise one of its functions, it must follow it. This principle has been developed over the last 15 years in a series of cases brought against the Secretary of State for the Home Department. … [it is now] treated as a freestanding ground of judicial review which is 'a requirement of good administration '. … Over recent years, the courts have taken an increasingly strong line on the need for public bodies to comply with their own policies. Culminating in [the case of] Mandalia, case law establishes the requirement to comply with a policy, whether it is published or

not, as a free-standing public law duty. This has potentially large consequences, creating a ground of challenge against any public body".

D&S IFCA's members must adhere to this principle when making decisions unless there are exceptional circumstances for not doing so.

4.3 Decision Making - Weighting

Weighting must be applied when considering evidence and advice in decision making and who is providing the Authority and the B&PSC with such evidence and advice is highly relevant. In particular their specialist knowledge and / or experience is especially significant.

In relation to the management of exploitation of sea fisheries resources in inshore English waters, bodies such as the Environment Agency, Natural England and Inshore Fisheries and Conservation Authorities are expert bodies and the advice provided to Authority Members by Officers of these three bodies constitutes independent specialist advice. Case law (Annex B), including that at Court of Appeal level, clearly establishes that where Parliament has established and tasked such bodies with fulfilling Parliament's intentions in a specialised sphere the decisions of these bodies, including IFCAs, enjoys an 'enhanced margin of appreciation' (what may be termed extra weight) and such bodies also enjoy a wide discretion in making decisions.

The same principles will apply to advice from IFCA Officers, since they are independent specialists in their specialist sphere and Members must treat the enhanced weight to be attached to Officers' advice accordingly. In particular, Members cannot substitute their own non-specialist views for the specialist advice from IFCA Officers.

Members may place weight on differing factors, including social impacts, but the reasons for the view held by a Member, and how the Member has applied weighting for their view, should be explained.

Members can question or challenge the best available evidence from Officers, but they should only do so on the basis of specialist knowledge or evidence that can be substantiated.

It is essential that Members adhere to these legal principles, as the decisions of the Authority (in particular the decision making of B&PSC Members) can severely impact the socio-economic welfare of coastal communities and individuals. Consequently, the decision making of an IFCA must be able to be defended in any legal challenge on the basis of substantiated evidence and objectivity. Subjective, emotional pre-determinations will be ultra vires and cannot form part of Members' decision-making.

4.4 Decision Making – Evolving Workstreams

Decision making relating to any topic, but particularly byelaw related workstreams, can become relatively long processes with different phases. It is not always possible to predict how many phases there will be. However, each may require multiple meetings (and decision making) to complete each task. The need for consistent decision making is important.

Officers' papers and the minutes from each Authority or B&PSC meeting are important to help Members maintain consistency with decision making throughout a prolonged process. Minutes from meetings can help those Members, that were not present during past discussions, to see what decisions were taken and why. All Officer papers and minutes from meetings are published on D&S IFCA's website – Section B of the website Resource Library. The most recent Authority and B&PSC Officers' papers are also available on the Authority and B&PSC Meetings display page.

Consultations:

As part of its byelaw related workstreams, D&S IFCA conducts both pre-consultation and formal consultation. Pre-consultation is often used to gain views on options for potential changes to management. This may take the form of "Have Your Say" or "A Call for Information" and are used to enable stakeholders (often permit holders but not only permit holders) to express their views at an early stage. Pre-consultation can be considered as "scoping". A start and end date for a pre-consultation will be advertised with the responses documented. The findings may inform Officers' papers and the discussions by the Authority or the B&PSC.

Formal consultation is different to pre-consultation, as it is focussed on specific changes that the Authority propose to make. Formal consultation is undertaken after the Authority or the B&PSC have concluded that they have considered enough information and evidence to formulate proposals for changes for management. Formal consultation reflects that the Authority or the B&PSC is supportive of change and have rationale to justify the change that will be set out to underpin the proposals in the formal consultation.

Unless new information or evidence of sufficient weight is provided to the Authority or the B&PSC in the formal consultation by the closing date, the logical outcome is that changes will be applied as proposed in the formal consultation.

The deadline for a formal consultation enables the findings to be documented. The process followed enables information and evidence to be analysed and potentially verified by Officers when preparing Officers' papers that may include recommendations for decision making. The information to be discussed is published and therefore in the public domain, so a wide audience can see what information forms the basis of decision making by Members.

Key Points:

- Decision making relating to different phases drives work forward.
- Any diversion away from the agreed decision making processes increases the risk that decisions may be judicially reviewed.
- Revisiting discussions or reversing decisions without new information or evidence must be avoided.

- Not fully understanding what decisions have already been taken by the Authority or the B&PSC, and why they were taken, can adversely impact or confuse the process.
- Consideration regarding "what has changed" is important as the process moves forward from phase to phase.
- What new information or evidence is available to justify a change in the proposed management (previously decided approach) set out in the formal consultation?

4.5 Discussing the Officers' Recommendations & Documenting Outcomes:

If the Officers' recommendations raise issues or concern, it is important that the minutes from meetings can be used to document the following:

- **What is the basis of concern or perceived risks associated with the Officers' recommendations?**
- **What aspects of the matter under consideration have not been adequately covered in the Officers' paper?**
- **How does the Members understanding of the issues differ from the presented information, and what weighting can be applied to it and why?**
- **What action can be taken to address concerns raised?**
- **Is there an alternative proposal (motion) to the Officers' recommendation?**

Un-planned actions or requests from Members for additional information may delay the workstreams/decision making process. However, this can be built into revised timetables for action.

5. Acceptable Standards of Personal Behaviour

5.1 Aims and Scope

Unacceptable personal behaviour undermines the aim of achieving and maintaining high standards.

- Members may experience personal unacceptable behaviour from members of the public and Members of the Authority. However, this, and procedures to address it, is outside the scope of this policy. D&S IFCA has a complaints procedure which should be referred to.

Acceptable behaviour, as defined in Section 5.2.1, of this policy extends to all environments where work related activities take place, including social gatherings organised by D&S IFCA. In most instances, issues can be resolved informally, however where issues are very serious or occur repeatedly, **formal disciplinary procedures** may be invoked.

a) D&S IFCA is committed to working towards creating a working environment in which all employees, Members, volunteers and contractors (individuals) are treated fairly, with dignity and respect and unacceptable behaviour will not be tolerated.
b) D&S IFCA is committed to tackling personal behaviour deemed inappropriate.
c) Unacceptable personal behaviour has a detrimental and negative effect on individuals and ultimately an organisation's efficiency.
d) All individuals have a clear role to play in helping to create a positive working environment. In particular, individuals should be aware of their own conduct and behave in a manner which ensures and promotes acceptable personal behaviour. All Officers and Authority Members have a responsibility to raise awareness of this issue and challenge and stop unacceptable personal behaviour in the workplace.
e) All individuals should be prepared to take appropriate action if they observe or have evidence that a D&S IFCA Officer, Member, or a stakeholder is being subjected to unacceptable personal behaviour and/or observe a D&S IFCA Officer or an Authority Member demonstrating unacceptable personal behaviour.

Unacceptable personal behaviour undermines the aim of achieving and maintaining high standards. The avoidance of personal unacceptable behaviour also applies to all volunteers and contractors undertaking work on behalf of D&S IFCA. Individuals may experience personal unacceptable behaviour from members of the public. However, this is outside the scope of this policy, other than removal from a meeting due to disturbance (Standing Orders).

Unlawful Action

- Any unacceptable personal behaviour directed towards another, including harassment based on age, disability, gender re-assignment, marriage & civil partnership, pregnancy & maternity, race (colour, nationality & ethnic or national origins), religion or belief, sex and sexual orientation is unlawful and will not be tolerated in any form by D&S IFCA. Action may be taken under different procedures that are not all set out in this policy.

5.2 Acceptable and Unacceptable Personal Behaviour

5.2.1 Acceptable Behaviour

People behave acceptably when they:

- Afford dignity, trust and respect for everyone and themselves;
- Have awareness of the effects of their personal behaviour on others and only make reasonable and manageable demands;
- Communicate honestly and openly, clearly stating what they need and expect of others;
- Provide and are receptive to honest feedback based on evidence;
- Challenge discriminatory language and behaviour in an appropriate way.

5.2.2 Unacceptable Personal Behaviour - Overview

In relation to unacceptable personal behaviour, the definitions and principles adopted in this policy are in line with the Equality Act 2010 (The Act) and ACAS guidance.

a) Protected characteristics

The Act offers protection to people with protected characteristics. These are: age; disability; gender re-assignment; marriage and civil partnership; pregnancy and maternity; religion and belief; sex and sexual orientation.

It is unlawful to discriminate, harass or victimise someone because they have or are perceived to have a protected characteristic or are associated with someone who has a protected characteristic.

b) Discrimination

Discrimination is to treat someone less favourably than another person because of a protected characteristic they have or are thought to have or because they associate with someone who has a protected characteristic or where it is perceived that an individual possesses a protected characteristic.

Indirect discrimination can occur where a provision, criteria or practice is applied which unfairly disadvantages someone on these grounds.

c) Harassment

Harassment is unwanted conduct relating to a protected characteristic (except for pregnancy & maternity and marriage & civil partnership) which may also be based upon association or perception, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It includes unwanted conducted of a sexual nature, verbal, non-verbal and physical conduct.

When defining behaviour in cases of harassment, it is appropriate to place emphasis on the recipient's experience rather than the motivation of the person complained about.

d) Bullying

Bullying consists of persistent actions, in public or private, which are offensive, intimidating, malicious or insulting, or an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the individual. This includes cyber bullying. People affected by bullying often feel the matter appears trivial or that they have difficulty in describing it.

5.2.3 Unacceptable Personal Behaviour - Examples

Behaviour that is acceptable to some individuals may cause embarrassment, distress or anxiety to others. Examples of what D&S IFCA regards as unacceptable behaviour include:

a)	Using aggressive language, threatening, ridiculing, ignoring people or repeatedly shouting (this includes in person, video calls, and telephone calls)

b)	Telephoning people at home unnecessarily (for example, demanding work when the person is absent due to sickness or ill health)
c)	Excluding or marginalising someone or refusing to engage with them appropriately
d)	Focusing only on weaknesses
e)	Bringing up details of someone’s private life inappropriately
f)	Leaving impossibly long lists of tasks and making unreasonable demands
g)	Criticising people or maliciously gossiping about them in their absence
h)	Ridiculing or demeaning someone – picking on them or setting them up to fail
i)	Comments or jokes, about distinctive peoples and nationalities
j)	Frequent comments about aspects of physical appearance or using forms of address that are demeaning
k)	Unwelcome sexual advances, touching, standing too close, display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
l)	Coercing someone to join the harassment/bullying of another person;
m)	Copying/forwarding emails, or other documents, that are critical about someone to others who do not need to know
n)	Sending detrimental texts via mobiles or posting detrimental images of work colleagues on external apps or websites following Authority meetings or events.

This list is not exhaustive. It is simply a guide to help all individuals consider their own and others workplace behaviour and gain understanding of what behaviours are unacceptable in the workplace or when acting in any capacity representing the Authority, or in any circumstances associated with Authority business.

Bullying and harassment may occur face to face, by written communications, visual images, electronic mail, phone and automatic supervision methods.

It is also recognised that an occasional raised voice or heated debate regarding work-related issues, or a topic to be discussed, in itself may not be unacceptable personal behaviour but is communication between colleagues, or Members, usually over issues that individuals feel passionate about, and can be a driver in the workplace, or meeting, for developing new ideas and better practices. However, it should be noted that at any time, an individual may believe that the boundary between ‘heated debate’ and unacceptable personal behaviour has been crossed and may want to address the issue.

Bullying - Differing Perspectives

Behaviour that is considered bullying by one person may be considered firm management, or strong opinion, by another. Legitimate, constructive, fair and evidenced criticism of an individual’s performance, or behaviour, in the workplace is not bullying or harassment.

It is unacceptable to condone bullying behaviour under the guise of a particular management style or a style of engagement with others. Whilst recognising that effective management, or expressing a personal view, may call for a firm and assertive style to achieve desired outcomes, it should be ensured that all individuals are treated with dignity and respect at all times.

6. Action and Procedures

6.1 D&S IFCA Standing Orders

a) D&S IFCA's Standing Orders should be referred to for circumstances where suspension of Membership (of a Member) is applicable. This includes if criminal proceedings are commenced against a General Member. If the proceedings are against an Elected Member the Chair of the Authority may ask the relevant council to consider acting.

b) D&S IFCA's Standing Orders set out circumstances where the Chair may be removed from office if the Authority considers that the Member is failing, or has failed, to discharge the duties of the Chair in accordance with legal requirements and its Standing Orders. For the purposes of this Policy, this extends to the Vice Chair and the Chair of any Sub-Committee.

c) The Standing Orders also include provisions relating to disturbance that, for the purposes of this policy, is also considered to be poor standards of performance or personal behaviour.

Meetings of the Authority (including Sub-Committees and Working Groups

In all cases any Member or Officer (or public observer) will be asked to leave an Authority meeting (including Sub-Committee or Working Group Meetings) if personal behaviour includes acts considered to be gross misconduct as set out in **Section 3.2** of this Policy

6.2 Complaints Procedure

D&S IFCA has a separate complaints procedure (Policy) that includes process for the following:

- **Complaints made about Officers**
- **Complaints made about General Members**
- **Complaints made about Statutory Members**
- **Complaints made about Elected Members**
- **Complaints made about the Organisation**

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Annex A: Dress Code

<u>Meetings and Events:</u>

Smart, clean, casual clothing appropriate to the meeting and other attendees' standard of dress.

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Annex B: Reference to Case Law

***David Levy v The Environment Agency and Blue Circle Industries PLC* [2002] EWHC 1663 (Admin) per Silber J. in at paras. 77-79**

“ 78. *The present approach to bodies like the Agency was described by Brooke J (as he then was) when he said, with my emphasis added in* ***R. v Social Fund Inspector ex parte Ali*** *(1994) 6 Admin LR 205,210E that:-*

> *“Decision after decision in the House of Lords over the last fifteen years had made it clear that when Parliament entrusts an expert body of people, whether they be tribunals or civil servants, or, as here, a combination of civil servants and independent inspectors, with the task of fulfilling the intentions of Parliament in a specialist sphere, the courts should be very slow to interfere”.*

79. … This work required the [Environment] Agency to use its specialist and technical expertise to evaluate the applications, to appraise complex scientific and commercial material and then to produce a reasoned decision document setting out its conclusions. As Lord Templeman explained in ***R v. Inland Revenue Commissioners ex parte Preston*** *[1985] AC 835, at pages 864E-F said that:-*

> *“the court cannot in the absence of exceptional circumstances decide to be unfair that which the commissioners by taking action against the tax-payer have determined to be fair. The commissioners possess unique knowledge of fiscal practices and policy”.*

*The comment is apposite to the difficult task that confronted the [Environment] Agency, who had unique knowledge of the technical and environmental mate*rial that had to be appraised in *reaching its decision on the June 2000 application.”*

- Members should bear in mind that exactly the same principles will apply to Authority members in their decision making having received advice from IFCA officers who are specialists in their field, or from Officers in Natural England or the Environment Agency.

***R (on the application of BACI Bedfordshire Ltd) v Environment Agency and another* [2019] EWCA Civ 1962 (Court of Appeal, Civil Division) per Lord Justice Lindblom at para. 99**

> “99. *I see no need to enlarge or refine the basic principle itself, which – as Beatson L.J. put it – was that “the court should afford a decision-maker an enhanced margin of appreciation in cases … involving scientific, technical and predictive assessments” (paragraph 69). This was, as he showed (in paragraphs 70 to 82), a principle already reflected in several decisions of this court. He cited the observation of May L.J. in R. (on the application of British Union for the Abolition of Vivisection) v Secretary of State for the Home Department [2008] EWCA Civ 417 (at paragraph 1) that although scientific analysis is “not immune from lawyers' analysis”, a reviewing court must be “careful not to substitute its own inexpert view of the science for a tenable expert opinion”. And he added that the court “should be very slow to conclude that the expert and experienced decision-maker assigned the task by statute has reached a perverse scientific conclusion”*

> *(paragraph 77). I agree. The court must always be astute not to step into the statutory remit of a regulator, or to engage in its own exercise of quasi-scientific judgment. "*

Similarly, Authority members must ensure that they do not substitute their own inexpert view for that of IFCA officers nor engage in quasi-scientific judgements but must proceed on the basis of specialist knowledge or evidence.

Adherence to Policy

Where an IFCA has a policy, whether published or unpublished, it must adhere to that policy in its decision-making unless there are exceptional circumstances for departing from adherence to the policy.

The Supreme Court has set this principle of Administrative Law *in Mandalia v Secretary of State for the Home Department* [2015] UKSC 59. A very useful explanation of this principle can be found at:

> https://publiclawandregulation.com/2016/09/30/the-duty-to-follow-policies-and-its-limits/

However, for convenience the following summary is based on this explanation:

> *" If a public body adopts a policy about how it will exercise one of its functions, it must follow it. This principle has been developed over the last 15 years in a series of cases brought against the Secretary of State for the Home Department. … [it is now] treated as a freestanding ground of judicial review which is 'a requirement of good administration '. … Over recent years, the courts have taken an increasingly strong line on the need for public bodies to comply with their own policies. Culminating in* [the case of] Mandalia, *case law establishes the requirement to comply with a policy, whether it is published or not, as a free-standing public law duty. This has potentially large consequences, creating a ground of challenge against any public body"*.

Authority members must adhere to this principle when making decisions.

End.