



COUNCIL CONSEIL
OF EUROPE DE L'EUROPE

Economic Crime Division
Directorate of Co-operation
Directorate General of Human Rights and Legal Affairs
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NOTE

STUDY VISIT: DUBLIN JUNE 2008

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**Ethics for the Prevention of Corruption in Turkey (TYEC)
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ANNEX 1: AGENDA

1. INTRODUCTION: RATIONALE FOR STUDY VISIT - REVIEWING THE WORK OF THE COUNCIL FOR ETHICS AND TRAINING MEMBERS AND STAFF

An early activity in the project was a review the working procedures of the council of ethics for the public service and its secretariat and make and implement proposals for improvement. part of the review identified a number of issues relating to the development of the Council of Ethics' capacity, with particular reference to establishing key priorities for the Council of Ethics in support of the fulfilment of its mandate over a phased period and the creation of structure, decision-making and reporting procedures required to provide capacity to meet these priorities. in considering the Council of Ethics' roles in relation to the code, and especially roles concerning prevention and monitoring, complaints and investigation, and awareness raising. this would involve consideration of a functional structure as the identity of the additional resources required to establish this initial capacity in the short-mid term.

In order the facilitate the discussions of the Council of Ethics a study tour was proposed to visit a number of agencies, as far as possible geographically co-terminous. with similar functions to those of the Council of Ethics, particularly with responsible for a Code.

2. IDENTIFIED INSTITUTIONS

The project has identified four EU institutions: the Audit Commission, the UK Commission on Standards in Public life, the Standards Board of England and the Irish Government's Standards in Public Office Commission. Between them they offer the Council of Ethics perspectives that will inform its developments, including:

- new institutions – 2 were established after 2000;
- independent budgets;
- strategic management and performance criteria;
- areas of responsibility – public officials, elected members at local or national level;
- Codes of Conduct or designated Statements of Standards;
- complaints procedures and right of investigation;
- allocation of cases to other bodies;
- publicity and awareness campaigns/websites;
- range of sanctions.

3. SPECIFIC FUNCTIONS

The work of the four institutions relevant to the work of the Council are:

3.1 Standards in Pubic Office Commission: Dublin

The principal ongoing functions of the Standards Commission are to provide advice and guidelines on compliance with the Ethics Acts, to administer the disclosure of interests and tax clearance regimes and to investigate and report on possible contraventions of the legislation. These functions of the Standards Commission apply to office holders and to public servants and, in relation to tax compliance measures, to all members of the Legislature. Apart from matters relating to tax clearance, the Committees on Members'

Interests of the Legislature have functions similar to those of the Standards Commission in relation to members of the Legislature who are not office holders.

The Standards Commission is an independent statutory body which was established by the Standards in Public Office Act 2001. It shares offices, however, with the Office of the Ombudsman and the Office of the Information Commissioner. The offices of the Ombudsman and the Information Commissioner, together with the Secretariat to the Standards in Public Office Commission (the Office), deliver on separate statutory functions through a structure of shared resources. While the three functions are separate, they can at another level be considered to be complementary to, and supportive of, the government's broader modernisation programme. The Director General is the Accounting Officer for the organisation supporting these three statutory roles.

The broad focus of the Ethics Acts is to provide for disclosure of interests, including any material factors which could influence a Government Minister or Minister of State, a member of the Houses of the Oireachtas or a public servant in performing their official duties. The principal objective of the legislation is to demonstrate that those who are participating in public life do not seek to derive personal advantage from the outcome of their actions. To meet this objective, a statutory framework has been put in place to regulate the disclosure of interests and to ensure that other measures are taken to satisfy the broad range of obligations arising under the legislation. The legislation is founded on the presumption of integrity but recognises that specific measures should exist to underpin compliance.

Section 10 of the Standards in Public Office Act 2001 provides for the introduction of Codes of Conduct which set out the standards of conduct and integrity expected to be observed by the persons to whom they relate in the performance of their official duties. The Standards Commission is responsible for the publication and distribution of Codes of Conduct. The Codes themselves are drawn up by other parties, following consultation with the Standards Commission. The Codes of Conduct for Members of Dáil Éireann and for Members of Seanad Éireann were drawn up by the appropriate Committees on Members' Interests while the Code of Conduct for Office Holders was drawn up by the Government. The Civil Service Code of Standards and Behaviour was issued by the Minister for Finance by way of a Circular (26/04). The detailed standards required of civil servants in the performance of their official duties cover: impartiality, respect for the law, disclosure of information, involvement in politics, dealing with the public, use of state resources, attendance at work, conflicts of interest, gifts, improper influence. The Code also details specific requirements placed on certain civil servants following their retirement or resignation.

3.2 Standards Board for England

The Standards Board provides the national and independent oversight necessary for there to be confidence in a locally based system of ethical complaints. Its responsibilities include: giving standards committees and councillors support and guidance on understanding the Code of Conduct, and on how to deal with complaints about the conduct of members of their council or authority; monitoring the performance of local authorities in the local assessment of complaints; and investigating the most serious cases where the local standards committee believes it is not best placed to deal with the matter. It covers 100,000 elected officials.

Every local body is required to adopt a Code of Conduct that sets out rules governing the behaviour of its members. All elected, co-opted and independent members of local authorities, including parish councils, fire, police and national park authorities, are covered by the Code. The Codes of Conduct cover areas of individual behaviour such as members not abusing their position or not misusing their authority's resources. In addition, there are rules governing disclosure of interest and withdrawal from meetings where members have relevant interests. Members are also required to record their financial and other interests. Each allegation of a breach of the Code will be assessed by the local authority's standards committee who will decide if it falls within their remit and should be investigated or whether other action should be taken. If it does, they will decide whether the matter should be investigated locally by the monitoring officer or whether they should ask the Standards Board for England to investigate the matter. All investigations are carried out in accordance with a defined set of values and procedures. A range of sanctions are available

The SBE's structure is: a Communications Department, a Governance Department, Human Resources, an Investigations Department, an IT Department, a Legal Department, and a Strategy and Guidance Department (which monitors the effectiveness of the standards framework and the performance of local authorities and produces guidance, and a programme of research to monitor the impact and effectiveness of the Standards Board, the wider legislative framework and corporate governance).

The SBE receives over 3,000 allegations annually, 62% are from members of the public. 19% of allegations referred for investigation. Of these, 38% involve no evidence of a breach of the Code and 55% no further action is taken. 7% involve sanctions, ranging from disqualification to censure and training. In some cases the SBE may issue directions in situations where a case has broad relevance for the governance of an authority, and is not just about the misconduct of a particular official.

3.3 Committee of Standards in Public Life

The Committee was given wide terms of reference when it was established in October 1994 by the Prime Minister John Major with the following terms of reference:

'To examine current concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in present arrangements which might be required to ensure the highest standards of propriety in public life. For these purposes, public office should include: Ministers, civil servants and advisers; Members of Parliament and UK Members of the European Parliament; Members and senior officers of all non-departmental public bodies and of national health service bodies; non-ministerial office holders; members and other senior officers of other bodies discharging publicly-funded functions; and elected members and senior officers of local authorities'.

On 12 November 1997 the terms of reference were extended by the Prime Minister, the Rt Hon Tony Blair MP: 'To review issues in relation to the funding of political parties, and to make recommendations as to any changes in present arrangements'.

John Major had said of the Committee that it was to “act as a running authority of reference - almost you might say, an ethical workshop called in to do running repairs” and this aspect of the Committee's work was reaffirmed in January 2000 as part of the Cabinet Office's Quinquennial Review of the Committee, which concluded that there was a: “...continuing need to monitor the ethical environment and to respond to issues of concern, which may arise.”

To fulfill this role and in addition to its formal inquiries, reports and research into public attitudes, the Committee devotes time throughout the year to discussing current issues and concerns relating to standards in public life. The Committee is always pleased to hear about possible areas for inquiry, but the remit of the Committee excludes investigation of individual allegations of misconduct. These considerations may, and sometimes do, result in a full-scale inquiry. Even where no inquiry is conducted, these are regarded by the Committee as a useful check on current standards and the effectiveness, or otherwise, of the arrangements in place to ensure the highest standards of propriety in public life.

The Committee has issued not only the Seven principles of Standards in Public Life but also issued 11 thematic or sector-wide reports, including reviews of progress, on:

Business Appointments; Civil Servants/Permanent Civil Service; Executive Non Departmental Public Bodies/Quangos; Funding of Political Parties; Government Information and Communication Service; Grant-maintained Schools; Higher and Further Education; Honours; House of Commons; House of Lords; Lobbying and All-Party Groups; Local Government; Members of Parliament; Ministers; Misuse of Public Office; NHS Trusts; Organisational culture; Personal Liability in Public Service Organisations; Prime Minister's Office; Public Appointments; Referendums; Registered Housing Associations; Special Advisers; Sponsorship of Government Activities; Task Forces; Training and Enterprise Councils and Local Enterprise Companies; Whistleblowing.

3.4 Audit Commission

The Audit Commission is an independent public audit body responsible for local government, housing, health, criminal justice and fire and rescue services. The Audit Commission audits local authority's plans for improvement and inspects local services to assess their quality, cost effectiveness and prospects for improvement. It is also responsible for the improvement and delivery of high standards of conduct in public life. For this it has a Good Conduct and Counter Fraud (GCCF) Network, using a range of tools, information and expertise, including self-assessment tools, to help local bodies achieve high standards of governance and proper conduct, and reporting on both good practice and failures. It uses toolkit-based self-assessment and awareness surveys, interviews, document reviews and workshops to assess awareness of ethical frameworks, and help to identify training and development needs. Alison Kelly will discuss the work of the Audit Commission.

4. LOGISTICS

To maximize the study tour, but also to address the visa requirements of the UK government within the available time period, it was decided to locate the visit in Dublin and invite representatives of the UK institutions to Dublin.

5. THE VISIT

The visit took place on: 9-13 June 2008 in Dublin/Ireland.

The members of the study party were: the members of the Council of Ethics and the members of the Council's secretariat.

To place the visit in context additional speakers were invited to discuss issues of Irish politics and government; the Council of Europe LTA gave a similar presentation on UK politics and government.

The agenda is attached in [Annex 1](#).

6. THE PRESENTATIONS

6.1 General

At the start of the study visit Neil Collins, Professor of Government, University College, Cork, described the current structure and issues relating to Irish politics, including the voting system which had led to candidates developing an individualistic approach to their relations with voters and the governance system that had led to decisions between government, the civil service and business that often circumvented the Legislature. Alan Doig outlined the regional approach to ethics for elected officials and appointed officials at local and national levels. During the week John Devitt, Chief Executive of Transparency Ireland gave an overview of ethical issues from the civil society point of view.

6.2 Organisational

Alison Kelly, UK Audit Commission, described the general work of the Audit Commission which took an approach to promote good practice and help those responsible for public services to achieve better outcomes for citizens, with a focus on those people who need public services most. While the main focus was on audit, the strategic approach included reviews of governance and accountability frameworks within which services were delivered, and for which the Audit Commission made available a range of tools, information and expertise, including self-assessment tools, to help local bodies achieve high standards of governance and proper conduct. This included:

- Steering group established to focus and develop our approach to governance and counter fraud across Audit Commission
- Governance and Counter Fraud Practice established
- Knowledge Network includes staff across England sharing knowledge, information and good practice
- Training sessions
- Extensive Intranet site – including notable practice
- Publications
- Methodologies and governance tools.

The Audit Commission recognised that arrangements and procedures alone did not bring about good governance and so focussed much of their work in this area on the appropriate culture, understanding and behaviours. For this it has developed a range of tools and approaches:

Good Governance Standard: this assesses and develops governance of an organisation or partnership using a survey, diagnostic and workshops;

Changing Organisational Cultures: raises fraud awareness within an organisation through a survey and workshops. <http://intranet.audit-commission.gov.uk/contentDisplay.aspx?nodeId=10764&quid=cd199c8b-c4be-4d8f-b78a-fb48b3c30974>

Ethical Governance Diagnostic: this assesses and develops ethical governance arrangements in organisation covered by the Local Government Act 2000 through survey, review and workshops.

The intention is to encourage self assessment by leadership and staff of the organisation concerned, with the organisation working with the Audit Commission to agree how well organisation doing, providing extensive feedback from staff or other stakeholders reality check for leadership, to develop future programmes and to monitor progress.

Gary Hickey, Research and Monitoring Officer, Standards Board for England, discussed the role of the Board in establishing the ethical framework for local government. He described in detail how the Board handled complaints – and the lessons learnt – before explaining how responsibility for investigations had been devolved to other agencies and how the Board had taken on a role of strategic regulation. In particular he explained the nature of the statutory Code of Conduct and the role and composition of local government Standards Committees whose main functions are to promote and maintain high standards of conduct for members and to help elected officials to follow the Code of Conduct, as well as giving advice on adopting a local Code of Conduct, monitoring the effectiveness of the Code, and training members on the Code or arrange such training.

He provided information on how the Committees assessed breaches of the Code - Failure to follow Code of Conduct; Failure to follow Code but no action needs to be taken; Failure to follow Code and penalised – and what sanctions were available:

- Censure the member
- Restrict the member's access to resources for up to 3 months
- Suspend or partly suspend for up to 3 months
- Suspend or partly suspend for up to 3 months on condition that member apologises or takes part in any conciliation the standards committee has ordered

He outlined the main components of an investigation – Planning, Documentary evidence, Interviews, Reports, Confidentiality, Appeals/complaints procedure – before stating the main lessons from the Board's experience which were:

- Set 'firm and high' referrals criteria and stick to it
- Establish a process for dealing with complaints
- Discourage frivolous and politically motivated complaints
- Set achievable deadlines for length of time of investigations
- Accurate forecasting of number of complaints
- Clarity about policeman/supporter

- Importance of local context
- Importance of legitimacy
- Importance of local government experience
- Alternatives to sanctions

With the changes to the investigative approach he then described in detail the Board's new strategic role, which had the intention of defining the ethical framework for local government; promoting and championing high standards; ensuring effective local arrangements; and monitoring effectiveness of local arrangements.

This approach was intended to ensure system as a whole is fair, to improve performance, to identify problems and to provide support and guidance. The methods to be used included: Quarterly returns (on number and nature of allegations; decisions, outcomes and efficiency; and basic standards committee information) and Annual returns (on activities/plans of standards committees and on wider governance issues) as well as sampling and consultation. The tools to assist this include: DVDs; a support and assessment team; guidance; a helpline; training; annual conference; and research. Overall this was intended to stop ethics slipping off agenda, to encourage ethical audits, to promote learning and understanding about ethics and to provide institutions with support.

The Irish Standards in Public Office Commission provided presentations on a number of issues, including:

Party finance: Aidan Moore of the Commission Secretariat described the main focus of the legislation - to regulate the acceptance and disclosure of political donations; to provide for the limitation, disclosure and reimbursement of election expenses and to provide for the public funding of qualified political parties – and the role of the Commission - to ensure compliance with the Act, to carry out an enquiry as it sees fit and to consider referral of offences to the DPP / Gardaí to prosecute;

Gifts: Paul Murphy of the Ministry of Finance described the law relating to gifts to public officials in terms of what was a gift and who was defined as a public official. He then outlined the reporting procedures and decisions, which included: determining the value of the gift; whether the gift was given by virtue of office; arranging for the custody of the gift and its disposal. He described the new amendments to the law which defines 'Benefit' as a gift of property or of money; a loan (capital value of the loan); the supply of a service or the loan of a property, addresses situations if offered a benefit at an occasion where it would be impractical to refuse it and empowers the Standards Commission to ask the applicant for such information as it considers necessary to consider the application for its opinion.

The main presentation concerned the establishment, composition and work of the Commission by Brian McKeivitt. He described the legislation and then in detail: Codes of conduct; Guidelines and advice; Making complaints; Investigations; Tax clearance certificates (TDs, Senators, appointees to "Senior Office"). He explained the remit and procedures relating to disclosable interests, the registration and availability of information on interests, and who was covered (both in terms of elected or appointed officials and their relatives and associates)

In terms of guidance he stated that the Standards Commission/Committees on Members' Interests publish statutory guidelines while the Standards Commission has also published guidelines for: Office Holders and Public Servants. At the same time any person may request advice from the Standards Commission (or Committees) about their obligations under the Ethics Acts and the Standards Commission must give advice or decline to give it within 21 days of receipt of request. Any person who has obligations under the Ethics Acts is obliged to act in accordance with guidelines issued or advice given unless doing so would contravene another provision of the Ethics Acts.

In terms of Codes of Conduct, these indicate the standards of conduct and integrity which apply to a person in the performance of their functions, are part of public servant's terms and conditions of employment and are admissible in proceedings before a Court, other tribunal, a Committee on Members' Interests or the Standards Commission. In Ireland, Codes apply as follows:

Standards in Public Office Act 2001

- TDs / Senators - drawn up by Oireachtas Committees
- Office Holders - drawn up by Government
- Public Servants - drawn up by Minister for Finance
- published by the Standards Commission

Local Government Act 2001

- Members
- Employees
- drawn up and published by the Minister for the Environment, Heritage and Local Government

In terms of investigations, the Commission may undertake them on receipt of a complaint or on their own initiative. The Commission has the powers to access documents and witnesses but reports are issued to relevant Committee/ the public body and sanctions a matter for the Oireachtas / the public body. The Standards Commission may appoint an Inquiry Officer who undertakes the following duties:

- Preliminary enquiry
- Seek statements
- Conduct interviews
- Request documents
- Prepare report to the Standards Commission to assist its consideration of whether to investigate
- No determinations or findings
- May, if requested, express opinion as to whether there is *prima facie* evidence to sustain the complaint.

An investigation will require direct attendance of those involved; statement of alleged contraventions; production of documents. It will be held in public and with each side represented. The Report will go to the complainant, the person complained of, the relevant Committee or public body and to the Minister for Finance. It will be published by the Standards Commission.

Finally in terms of training awareness, the Commission provides guidelines and advice, presentations to Public Bodies, runs a website, issues an annual Report, etc.

The last presentation was from Charles Ramsden, Secretary of the UK Committee on Standards in Public Life. After describing the establishment, composition and work of the Committee, he outlined how the Committee undertook its work:

- Analysis of current public concerns – monthly analysis and horizon scanning
- Selection of inquiry subject after consultation with Head of UK Civil Service OR government ask CSPL to inquire into a specific subject
- Issues and Questions paper published inviting views
- Written evidence submitted and published
- Independent research commissioned
- Public hearings throughout the UK
- Drafting -Consideration of evidence
- Publication of conclusions and recommendations
- Government replies formally and Parliament debates.
- Press releases commenting on current issues
- Responses to Government consultations
- Annual Reports of what Committee has been doing and thinking over last 12 months – introduced at annual Open Meeting
- Biennial Surveys of Public Attitudes to Conduct in UK public life
- Seminars and conference on standards issues.

He listed the impact of the Committee's work:

Parliament

- Creation of Parliamentary Commissioner for Standards (reporting to Standards & Privileges Committee)
- improved registration of private financial interests
- ban on paid advocacy, i.e. being paid to speak in debates and ask questions on behalf of clients
- Codes of Conduct for MPs and Lords

Central Government

- Civil Service Act setting out roles of civil servants and political advisers
- Appointment of "Independent Adviser on Ministerial interests"
- Civil Service Commission to become statutory body: selection on merit to have legal force
- Many changes / improvements to codes of conduct for Ministers, Civil Servants, political advisers

Public Bodies

- Office of Commissioner of Public Appointments established (1995) to regulate Ministerial Public Appointments.
- Codes of conduct based on Principles of Public Life for Boards of public bodies

Local Government

- Local Government Act 2000, incorporated Codes of Conduct for councillors and employees. Standards Board (regulator) set up.

Political Parties

- Disclosure of donations. Electoral Commission established to regulate party funding and oversee elections and referenda.

6.3 Summary

On the final day the members of the Study Party discussed the range of issues that had emerged from the week. Members were very interested in the various approaches, from monitoring to investigations, and the combination of an ethical focus with other work. They recognised the importance of engaging the involvement and commitment of other agencies and of public officials and ministries taking the lead on ethical standards.

Specifically a number emerged for further discussion:

- The value of public monitoring of and reporting on ethical frameworks;
- The value of shared resources – the Standards Commission was able to draw on resources shared with the Irish Ombudsman;
- The need to share roles and responsibilities with other agencies;
- The importance of ministries and other public bodies to ‘own’ responsibility for their ethical frameworks;
- The focus on standards and performance in the public sector and the role of the Council to deal with one aspect – breaches of the Code – and the possibility to extend its work into that of an Ombudsman to address breaches of performance and public service.

ANNEX 1: AGENDA



Council of Europe
European Commission



Conseil de l'Europe
Commission européenne

ETHICS FOR THE PREVENTION OF CORRUPTION IN TURKEY

STUDY VISIT AGENDA

9 June 2008 Monday	
09:00-10:45	<ul style="list-style-type: none"> ▪ Politics, Institutions, Corruption and Public Ethics in Ireland Neil Collins, Cork University
10:45-11:15	Coffee Break
11:15-13:00	<ul style="list-style-type: none"> ▪ Politics, Institutions, Corruption and Public Ethics in UK Alan Doig, Resident Advisor
13:00-14:00	Lunch
14:00-15:15	<ul style="list-style-type: none"> ▪ Audit, Inspection and Governance Alison Kelly, UK Audit Commission
15:15-15:30	Coffee Break
15:30-17:00	<ul style="list-style-type: none"> ▪ Audit, Inspection and Governance Alison Kelly, UK Audit Commission
10 June 2008 Tuesday	
09:00-10:45	<ul style="list-style-type: none"> ▪ Devolved Relations Gary Hickey, Standards Board for England
10:45-11:15	Coffee Break
11:15-13:00	<ul style="list-style-type: none"> ▪ Ethical Environments Gary Hickey, Standards Board for England
13:00-14:00	Lunch
14:00-15:15	<ul style="list-style-type: none"> ▪ Monitoring Gary Hickey, Standards Board for England
15:15-15:30	Coffee Break
15:30-17:00	<ul style="list-style-type: none"> ▪ Role of Regulation Gary Hickey, Standards Board for England
11 June 2008 Wednesday	
09:00-10:45	<ul style="list-style-type: none"> ▪ Public Ethics Culture in Ireland John Devitt, Transparency International
10:45-11:15	Coffee Break
11:15-13:00	<ul style="list-style-type: none"> ▪ Role of Civil Society John Devitt, Transparency International

12 June 2008 Thursday	
10:00-10:30	<ul style="list-style-type: none"> ▪ Standards in Public Office Commission: Legislative Context, Commission Composition, Roles and Functions Brian McKeivitt, Standards in Public Office Commission
10:30-11:00	<ul style="list-style-type: none"> • 1995 Ethics in Public Office Act: disclosure of interest; gifts; guidelines Brian McKeivitt, Standards in Public Office Commission
11:00-11:15	Coffee Break
11:15-11:45	<ul style="list-style-type: none"> ▪ 2001 Standards in Public Office Act: Tax Clearance; Codes of Conduct Brian McKeivitt, Standards in Public Office Commission
11:45-12:00	<ul style="list-style-type: none"> ▪ Ethical framework for Local Government Service Brian McKeivitt, Standards in Public Office Commission
12:00-13:30	Lunch
13:30-14:00	<ul style="list-style-type: none"> ▪ Role of Department of Finance and Ethics Legislation Paul Murphy, Department of Finance
14:00-15:00	<ul style="list-style-type: none"> ▪ Complaints to the Standards Commission Brian McKeivitt, Standards in Public Office Commission
15:00-15:15	Coffee Break
15:15-15:45	<ul style="list-style-type: none"> ▪ Training and Awareness of the Ethics Acts Brian McKeivitt, Standards in Public Office Commission
15:45-16:00	<ul style="list-style-type: none"> ▪ General Discussion and Close
13 June 2008 Friday	
09:30-10:30	<ul style="list-style-type: none"> ▪ Evaluation – What Works and Why? Alan Doig, Resident Advisor
10:30-11:00	Coffee Break
11:00-13:00	<ul style="list-style-type: none"> ▪ National Oversight of UK Public Sector: The Impact of the Committee Charles Ramsden, Committee on Standards in Public Life, UK