



COTSWOLD
District Council

Cotswold District Council

Decision Notice – Outcome of a Formal Investigation into an Alleged Breach of the Code of Conduct Date 18.04.2026

Reference: 2025/2006

Subject Member: Councillor Joe Harris, Cotswold District Council

Complainant: Councillor Tom Stowe, Cotswold District Council

Independent Person: Rob Cawley

Assessment undertaken by: Angela Claridge, Monitoring Officer.

NO FURTHER ACTION

Introduction

On 24 November 2025, following media speculation relating to procurement activity, Councillor Joe Harris voluntarily self-referred the matter to the Monitoring Officer. While he did not consider that he had breached the Code of Conduct, he did so in the interests of transparency.

On 2 December 2025 the Monitoring Officer received a complaint from Councillor Tom Stowe alleging that Councillor Harris had breached the Cotswold District Council Code of Conduct for Elected Members.

Following an initial review, the Monitoring Officer consulted one of the Council's appointed Independent Persons, Rob Cawley. On 24 December 2025, it was agreed that the allegations should be referred for a formal investigation.

Cotswold District Council ("the Council") commissioned the Shared Anti-Fraud Service (SAFS) of Hertfordshire County Council to investigate allegations that Councillor Joe Harris failed to comply with the Council's Code of Conduct for Elected Members ("the Code") in connection with the procurement of communications and rebranding services undertaken between March and August 2024 ("the Project").

The allegations principally concern the identification and engagement of companies invited to quote for the project.

At the relevant time, Councillor Harris was Leader of the Council. He ceased to hold that office in May 2025.

Summary of the Allegations

The complaint alleged that Councillor Harris breached the following provisions of the Code:

- Paragraph 7.5 – Improper use of position.
- Paragraph 7.6 – Compromising officer impartiality.
- Paragraph 7.9 – Failure to promote high standards of conduct.
- Paragraph 7.10 – Conduct bringing the role or authority into disrepute.
- Paragraph 7.15 – Failure to ensure decisions are made on merit.

These allegations were considered having regard to the general obligations placed on members by the Code, including compliance with the Nolan Principles, avoidance of conflicts between personal and public interests, and the requirement that public resources be used appropriately.

Findings of Fact

- Councillor Harris supported the undertaking of a communications and rebranding exercise and suggested a third-party supplier for consideration by officers.
- Councillor Harris did not undertake, direct, or participate in the evaluation of tenders, scoring of bids, or the award of any contract arising from the Project.
- The procurement process was led by officers. Identified deficiencies relate to officer processes and controls rather than member decision-making.
- There is no evidence that Councillor Harris sought to influence the procurement outcome, exerted improper pressure on officers, or derived any personal or indirect benefit from the award of the contract.
- Councillor Harris attended certain supplier presentations; his involvement was limited to introductory remarks, after which officers conducted the process.
- A separate third-party organisation was unsuccessful in the procurement exercise. Councillor Harris did not recommend that organisation. A family association arose **after** the procurement had concluded and was disclosed in accordance with Register of Interests requirements.

- Councillor Harris publicly identified himself as the councillor referenced in a committee report and voluntarily self-referred the matter.

Decision

Following receipt of the investigation report, the Monitoring Officer consulted with the Independent Person who concluded on 15 April 2026, that the evidence does not demonstrate that Councillor Harris failed to comply with the Code of Conduct.

Accordingly, it is determined that no breach of the Code is established.

The decision is reached for the following reasons:

- The Code does not prohibit members from suggesting potential suppliers, provided they do not participate in, or improperly influence, procurement decisions.
- There is insufficient evidence to conclude that Councillor Harris used his position improperly or compromised officer impartiality.
- The procedural shortcomings identified relate to officer conduct and systems rather than member behaviour.
- No undeclared interest or conflict is established that affected, or could reasonably be perceived as affecting, the procurement outcome.
- Taken collectively, the evidence does not meet the threshold required to substantiate a breach of the Code.

The finding of no breach should not be interpreted as endorsement of the procurement process itself, which has been the subject of separate review and recommendations.

Reasons

In reaching a decision, the Monitoring Officer and Independent Person have had regard to:

- External investigation report and appendices
- Internal audit and governance reports
- The written complaint and written response
- Interview notes with the Subject Member

This decision has been reached following a proportionate investigation, based on the evidence available, and in accordance with the Council's adopted procedures.

Recommendations and Learning Points

While no breach of the Code has been found, the SAFS report identifies areas for organisational learning, including:

- Timely and accurate completion of Registers of Interests by members.
- Clearer demarcation between member leadership and officer operational responsibilities.
- Strengthened governance arrangements for procurement activity.

Appeal

There is no right of appeal against this decision except by way of judicial review or referral to the Local Government & Social Care Ombudsman.

To:

Cllr Tom Stowe –the complainant
Cllr Joe Harris – the Subject Member
Rob Cawley - Independent Person

Angela Claridge
Monitoring Officer
Dated: 18.04.2026