

**A REPORT OF THE TOWN CLERK TO
A MEETING OF MALVERN TOWN COUNCIL
to be held on Tuesday 12 May 2026 at 6.00pm
in The Link Room, St Matthias Church, 46 Church Road, Malvern, WR14 1LX**

CODE OF CONDUCT COMPLAINT

1. Purpose of Report

- 1.1. To consider the Code of Conduct Complaint Report of Investigation in respect of Councillor Nathan Wanklin along with the subsequent recommendations from the Audit and Standards Committee.

2. Recommendation

- 2.1. That Malvern Town Council considers and accepts the findings from Malvern Hills District Council in respect of the Code of Conduct Complaint made against Cllr Nathan Wanklin.
- 2.2. That under Section 14d of the Council's Standing Orders, Malvern Town Council considers the following recommendations from Malvern Hills District Council Audit and Standards Committee (ASC)
- i. One to One training on various matters for Cllr Wanklin (points 101 to 103 of investigation report)
 - ii. No role for Cllr Wanklin on the school streets initiative (point 104 of investigation report)
 - iii. The Town Council to review their induction procedures, communications policy and councillor conduct (points 105 to 108 of investigation report)
 - iv. Consideration should be given to introducing a social media usage policy for all members
 - v. Consideration should be given to introducing an IT usage policy for all members
 - vi. Consideration should be given to limiting Cllr Wanklin's access to Council stationary e.g. his use of the Town Council email address, limiting access to Town Council offices and staff: to be by appointment only with only named points of contact etc
 - vii. Consideration should be given to limiting Cllr Wanklin's membership to any committees, sub committees, working groups or similar.

- 2.3. The Town Council agrees its position and any other actions.

3. Background

- 3.1. On 2 November 2025, the Monitoring Officer received a complaint relating to Cllr Nathan Wanklin. This had been submitted by the Town Council following a meeting of its Emergency Decision Making Panel.

- 3.2. It was concluded that this complaint should be investigated and after an investigation taking approximately four months, the Investigating Officers appointed by MHDC found that on the balance of probability there had been a breach of the Code of Conduct. Their report is attached at Appendix A. Please note that this report has been redacted and that due to their length the appendices to the report are not provided.
- 3.3. On 11 April, Cllr Wanklin confirmed that he did not accept the findings of the investigation and the matter was scheduled to be reviewed by the ASC at a special hearing on 7 May 2026.
- 3.4. At the hearing the Committee considered the investigation, asked questions as they felt appropriate and made a finding as to whether there had been a breach of the Code of Conduct.
- 3.5. The ASC unanimously agreed to endorse the report and the recommendations in full but also added some further recommendations to the three original recommendations for the Town Council to consider. The decision of the ASC is final and is attached at Appendix B.
- 3.6. The Town Council must now receive this report, the decision of the ASC, consider the findings and agree any actions.

4. Financial Implications

- 4.1. The cost of any one-to-one training courses would need to be funded by Malvern Town Council.

5. Legal Implications

- 5.1. Under the Localism Act Section 27 (i) the Town Council must promote and maintain high standards of conduct by members and co-opted members of the authority.
- 5.2. The Town Council adapted the LGA Model Councillor Code of Conduct in June 2022 and all Councillors sign to undertake to observe this code.
- 5.3. Section 14d of the Town Council's Standing Orders states that "upon notification by the District of Unitary Council that a Councillor or Non-Councillor with voting rights has breached the Council's Code of Conduct, the Council shall consider what, if any, action to take against them. Such action excludes disqualification or suspension from office.

End
Linda Blake
Town Clerk

CODE OF CONDUCT COMPLAINT REPORT OF INVESTIGATION

Councillor Nathan Wanklin of Malvern Town Council

Complaint investigation

1. This report outlines the findings of an investigation into the conduct of Councillor Nathan Wanklin ('Cllr Wanklin') following a complaint that was made by Malvern Town Council ('MTC'). A copy of the complaint is attached (**Appendix 1**).
2. In summary, the complaint alleged that Cllr Wanklin may have breached the Malvern Town Council code of conduct (**Appendix 2**) as a result of his communications with individuals and organisations external to MTC.

Chronology

3. Cllr Wanklin was co-opted to MTC at a Full Council meeting on 6th May 2025. He was not present at that meeting and attended the Council office on 8th May 2026 to sign his acceptance of office.
4. On 2nd November 2025, the Monitoring Officer ('MO') at Malvern Hills District Council ('MHDC') received a Councillor Code of Conduct complaint about Cllr Wanklin.

The complaint was made by MTC and sent by the Town Clerk, Linda Blake ('LB'), as instructed by the MTC's Emergency Decision Making Panel.

5. The MO acknowledged the complaint by email and letter dated 3rd November 2025.
6. The MO notified Cllr Wanklin of the complaint on 3rd November 2025 inviting him to forward any comments he might have about the complaint in writing by 14th November 2025.
7. Cllr Wanklin responded to the MO by email on 6th November 2025. The response is attached at **Appendix 3**.
8. Having received Cllr Wanklin's response, the MO sought the Independent Person's ('IP') views on 19th November 2025 as to whether an investigation should be carried out.
9. On 21st November 2025, after reviewing the complaint letter from MTC and Cllr Wanklin's response, the IP advised that further investigation should be undertaken as there were conflicting opinions on each side of this complaint; they advised that this was because MTC made many serious allegations about Cllr Wanklin's behaviour over a period of time, and that Cllr Wanklin "categorically" rejected the allegations in his response.

10. The investigation of this matter was then delegated to [REDACTED]

Evidence

20. During the course of this investigation, the IO's have considered information provided by:

- [REDACTED]
- Malvern Town Council (MTC)
- Malvern Hills District Council (MHDC)
- Wychavon District Council (WDC)
- [REDACTED], [REDACTED] ([REDACTED], [REDACTED])
West Mercia Police

Where necessary, the IO's also held interviews with individuals to gather further information. The information pertinent to the findings of this report are attached in the appendix pack.

MTC

21. In addition to the written complaint provided by MTC, the IO's interviewed the Clerk, LB, and Council Leader, Cllr Birks, on 20th January 2026 to gather additional information regarding the allegations that had been made about Cllr Wanklin's conduct.

22. Cllr Birks began by providing examples of several comments and concerns which had been raised with MTC by various individuals and organisations, regarding Cllr Wanklin's conduct. These included [REDACTED], the Citizen's Advice Bureau, [REDACTED], and a County Councillor.

23. Cllr Birks also referred to the content, tone and volume of emails sent by Cllr Wanklin from his MTC email address to [REDACTED] officers, County Cllrs and Cabinet members, and external organisations, which had contributed to the concern at MTC. These are summarised below:

24. Email - Cllr Wanklin to [REDACTED], [REDACTED] on 14th May 2025
(Appendix 5)

25. Cllr Wanklin writes in relating to a pre-existing email chain with [REDACTED]

*'I wanted to pick this up more formally now **in my capacity as Cllr** [emphasis added] so please reply to this thread moving forward'.*

This related to an issue that Cllr Wanklin had initially raised with [REDACTED] as an individual resident/constituent.

[REDACTED] responded on 22nd May 2025, copying in MTC Clerk LB, to clarify if this was MTC business. Cllr Wanklin acknowledged in his reply that the matter was not raised by MTC, and he apologised if he had misunderstood the correct use of the MTC email.

Cllr Birks and LB confirmed in the interview that this was not MTC business. When asked if there was an email follow up or conversation with Cllr Wanklin regarding his use of his MTC email address and Councillor status, LB advised she would have to look back at emails. It was subsequently confirmed that there had not been a follow up at this point.

26. Email - Cllr Wanklin to [REDACTED] FOI officer on 30th July 2025 (**Appendix 6**)

27. Cllr Wanklin made a request under the Freedom of Information Act 2000 (FOI) for a call recording of his conversation with a [REDACTED] officer due to their *'statements which appear to be demonstrably false'* and conduct he considered to be *'inappropriate and obstructive'*. In the email Cllr Wanklin also requested the following information:

*'The name and contact details of the investigating officer or team dealing with this matter internally, as it now clearly involves potential misconduct, misleading statements, and an attempt to **deter a sitting councillor** [emphasis added] from pursuing a legitimate safeguarding concern.'*

This was followed up with another email from Cllr Wanklin to FOI MHDC on 31st July 2025 (**Appendix 7**), where Cllr Wanklin states:

'I have just received a call from [REDACTED] who has been animated and rude then hung up. I'd also like that call added to the FOI.'

28. [REDACTED] for [REDACTED], responded to Cllr Wanklin's email, copying in MTC Clerk LB, on 4th August 2025 (**Appendix 8**). [REDACTED] asked LB to confirm whether MTC wished to pursue the complaint as laid out by Cllr Wanklin.

Cllr Wanklin emailed LB on 4th August 2025 (**Appendix 9**), stating that [REDACTED] had: *'absolutely no right to assume I'm acting as a Councillor here [...] you have been copied in incorrectly.'*

29. Cllr Birks explained that because of increasing issues such as these, she had an informal meeting with Cllr Wanklin on 23rd August 2025, to highlight inappropriate use of MTC email for personal matters. This meeting was held at a slightly later date than it otherwise would have been due to a bereavement suffered by Cllr Wanklin.

30. Cllr Birks stated the matter of correctly using of the MTC email address was understood by Cllr Wanklin following this meeting, and that the explanation provided by Cllr Wanklin was there had been confusion with the phone that he was using sending from the MTC email account rather than his personal.

31. Cllr Birks did not have a written record of the content of this meeting. However, Cllr Birks did follow this conversation up with an email to Cllr Wanklin on 1st September 2025 (**Appendix 10**) to confirm he had found a way to *'delineate between correspondence you send on approved Town Council business and that*

which relates to your campaigning'. Cllr Birks confirmed there was no reply from Cllr Wanklin to this email.

32. Transport Working Group – School Streets initiative

33. Cllr Birks outlined the work of the Transport Working Group, and a meeting held with [REDACTED], [REDACTED] to discuss a School Streets initiative aiming to improve the safety of roads around schools. Cllr Wanklin attended this meeting in his capacity as Town Councillor and during the meeting he expressed an interest in moving forward with the initiative for [REDACTED].
34. MTC subsequently received an email from [REDACTED] stating they were keen to move forward with the initiative and were happy to work with MTC as part of the school's wider work to promote pupil safety but did not feel it was feasible to work with Cllr Wanklin on the project. They stated this was due to a communication plan that was in place with Cllr Wanklin in his personal capacity because of the frequency and content of his emails to [REDACTED].
35. Following the interview with Cllr Birks and LB, the IO's obtained further details on this communication protocol; this stated that emails from Cllr Wanklin's personal email address would not be routinely responded to except where legitimate safeguarding concerns were raised, and that his emails would be filtered out of inboxes.
36. Cllr Birks and LB confirmed that Cllr Wanklin had not approached MTC to discuss the potential conflict of interest given the communication restriction in place between him, in his personal capacity, and [REDACTED]. They also confirmed that there were no conversations about Cllr Wanklin taking on the project and working with the school, other than him being keen for [REDACTED] to take part in the scheme.
37. Cllr Birks advised that MTC were also made aware that Cllr Wanklin had gone beyond what was expected of him in his position by completing the application for the School Streets initiative on behalf of [REDACTED] without consultation with, or agreement from, [REDACTED]. This is corroborated by evidence from [REDACTED]. Cllr Birks confirmed that MTC would not expect a councillor to proceed without working closely with a school and ensuring it was an initiative the school would want to take up.
38. When asked whether moving forward with a project independently would be considered reasonable or appropriate for a town councillor, Cllr Birks and LB advised the usual protocol would be for the town councillor to have a conversation with the school to ask if they would like to work together. The concern for MTC in this instance was Cllr Wanklin had not declared a conflict of interest, nor his interest as a parent. They said there had also been a blurring of the lines between his role as parent and that of Town Councillor, as [REDACTED] was not within Cllr Wanklin's ward. The final concern was Cllr Wanklin completing the forms without any school input or approval.

General communications with [REDACTED]

39. Cllr Birks provided copies of emails between MTC and [REDACTED] (**Appendix 11**), which further outlined concerns over Cllr Wanklin's conduct and communication with [REDACTED].
40. In discussing the communication evidence supplied by MTC from [REDACTED] Cllr Birks advised that she had also been informed by [REDACTED] that several teachers and members of staff within the school reported feeling intimidated by Cllr Wanklin which was relevant to him pursuing a working relationship with them on behalf of MTC.
41. Cllr Birks drew the IO's attention to an email sent by Cllr Wanklin to [REDACTED] on 17th September 2025 from his MTC email account, writing:
- 'Subject: Gentleman in reception. Black top red stripe.*
- You might want to ask him to take his chewing gum with him!
It's on your fence and wall!!'*
- This was followed up with another email from Cllr Wanklin, a minute later, from his personal email writing:
- 'Not on council business. Obviously.'*
42. In an email from [REDACTED] to Cllr Birks on 22nd September 2025, [REDACTED] stated in their view Cllr Wanklin had used his MTC email account in the knowledge that it would not be caught by the filter in place for his personal email account. They also noted there was no apology for the error Cllr Wanklin may have made.
43. A further email from [REDACTED] to Cllr Birks described a conversation with Cllr Wanklin in his personal capacity, and states: *"Appreciate this is not council business, however the blurred lines between his roles and motives are making a resolution difficult to achieve."*
44. When considering when Cllr Wanklin was acting as a representative of MTC, Cllr Birks and LB advised that, as far as they were aware, from the time of his election in May 2025, Cllr Wanklin had not been operating on any Council business so he would not have had any need to communicate with anyone in this capacity. They clarified that while having conversations as a Town Councillor would be expected, to go further and act on plans or fundamental principles to start a scheme – such as the School Streets scheme – would not be.
45. Cllr Birks explained that this had contributed to the increasing concern within MTC regarding not just the inappropriate use of the MTC email but also the potential impact of Cllr Wanklin's conduct and actions on the reputation and public perception of the Council as a whole.

Social media posts

46. Cllr Birks referred to several social media posts made by Cllr Wanklin in his personal capacity, which were sent to MTC by concerned individuals as they were considered defamatory regarding individuals and organisations (**Appendix 12**). These posts were all made from Cllr Wanklin's personal social media account.
47. Cllr Birks advised that although these were made from Cllr Wanklin's personal account, associations with MTC would be known, as was evidenced by people providing MTC with copies of these.
48. Cllr Birks acknowledged there is a balance to be struck between having a personal life and being a Town Councillor but highlighted that MTC perceived the lines to be blurred by Cllr Wanklin, in that numerous concerns were being shared with MTC about his views as representing those of MTC.

Induction / training

49. The IO's asked MTC to provide information about the induction and any subsequent training that Cllr Wanklin received when he was elected in May 2025.
50. LB advised that there were no formal records to document the induction process, or the areas covered. LB advised that for Cllr Wanklin's induction she would have made a list of the areas to cover, including the Register of Interests form and declarations of interest, committees, town council email, and how things worked for MTC. She advised this was the same process as had been followed for all councillors. As there had never been a need for a formal record before, one wasn't made on this occasion either.
51. LB stated Cllr Wanklin had been advised the "door was always open" if he had any questions or wanted to become more involved in any areas as a councillor, meaning he could come to her with questions and for guidance at any time.
52. When asked about what training is available to Councillors, Cllr Birks advised that training was carried out by Worcestershire County Association of Local Councils ('CALC') and unfortunately Cllr Wanklin had joined as a co-opted member at a time where there were no CALC sessions from the time of co-option to the complaint being raised. She advised, again, the "door had been opened" at induction for any questions to be raised, with LB or Cllr Birks, or fellow councillors.
53. Cllr Birks and LB had not been approached by Cllr Wanklin in relation to any training needs, and they were not aware of Cllr Wanklin approaching any other Councillors for training. They noted that Cllr Wanklin had been absent from a number of meetings where the opportunity to discuss this may have arisen.
54. Cllr Birks and LB provided an example of previous interactions with Cllr Wanklin where feedback had been provided to him regarding his role. They stated that

Cllr Wanklin had tried to table a motion at a council meeting without appropriate notice. Following this, advice on procedural points was given, which they stated was not well received by Cllr Wanklin.

55. When asked about the MTC Communication Policy, Cllr Birks and LB confirmed that acceptable use of the MTC email address was not explicitly referred to in the policy, but it was explicitly covered in the induction process with Cllr Wanklin, as it is for all councillors.

Register of Interests

56. At the time of the interview with Cllr Birks and LB on 20th January 2026, Cllr Wanklin had not completed his Register of Interests form. LB confirmed that Cllr Wanklin was made aware of the form, and the need for completion, at induction on 8th May 2025. This was followed up by three emails - 2nd December, where a blank form was attached, 17th December 2025, where it was requested for the completed form to be brought to Full Council that evening, and 22nd December 2025, where a hard copy was also offered, together with the option of posting the form to Cllr Wanklin.

57. LB advised that completion of the form was also mentioned at council meetings, and a copy put in front of Cllr Wanklin at a meeting, and via a WhatsApp message. No response had been received from Cllr Wanklin, nor the form completed.

58. MTC highlighted that the responsibility to complete and return the Register of Interests form sits with the councillor, but there had been no responses to chasing undertaken by MTC, nonetheless.

59. The IO's were subsequently advised that Cllr Wanklin submitted a Register of Interests form dated 2nd February 2026, sent by MTC to the MO on 12th February 2026.

60. In conclusion Cllr Birks highlighted that her role as Mayor of MTC was to try and build partnerships and close working relationships between MTC and other organisations and individuals. The volume of comments and perception of Cllr Wanklin as an MTC Cllr, following his conduct and communications, had not been conducive to MTC taking work forward with those partners, and had made a negative impact on MTC's reputation.

Parent Governor

61. MTC had also received a complaint from a [REDACTED] in relation to Cllr Wanklin's behaviour towards them. MTC were concerned by Cllr Wanklin's behaviour in his personal capacity affecting his reputation as a Town Councillor, and of MTC as a whole by association.

Cllr Wanklin

62. An interview was arranged to take place on 22nd January 2026 with Cllr Wanklin. Prior to the interview taking place, a satisfactory resolution could not be reached in relation to Cllr Wanklin's use of any recording of the interview. As such, Cllr Wanklin instead submitted a written response to the initial interview questions, which had already been shared with him on 12th January 2026, at his request. The initial questions and Cllr Wanklin's response are set out in **Appendix 13**.
63. Cllr Wanklin provided a written response, and after reviewing this the IO's sent him a list of follow up questions on 2nd February 2026, as set out in **Appendix 14**, with a requested return of 9th February 2026. This deadline was extended to consider representations from Cllr Wanklin and allow him sufficient time to respond; this was firstly to 13th February and subsequently 16 February 2026, however no response was received.

Transport working group – School Streets Initiative

64. The IO's asked Cllr Wanklin to provide further information on him acting for MTC in relation to this matter. He confirmed he was acting as an individual councillor responding to a community issue and not under a formal council mandate.
65. Cllr Wanklin stated his consultation work was extensive, every resident commented and supported the proposal as did various councillors. However, the IO's have not been provided with any further information as to which residents were consulted, what the consultation involved, and Cllr Wanklin has not provided any evidence to say that he consulted with [REDACTED] prior to his work on the initiative.
66. Cllr Wanklin stated he had support from MTC, Cllr Birks, and others, to pursue the School Streets initiative with [REDACTED], and he was encouraged to proceed and progress the scheme. Although requested, the IO's have not received any evidence of this support or encouragement.

General communications with [REDACTED]

67. The IO's asked Cllr Wanklin to provide details of any correspondence he had sent to the school using his MTC email address since his communication protocol was implemented, including the date and nature of correspondence. Cllr Wanklin responded to say there has been a significant volume of correspondence, and that providing a detailed schedule would require time to review and redact third-party data and confirm what can lawfully be shared. No further information was provided by Cllr Wanklin in relation to this.
68. The IO's asked Cllr Wanklin about the email sent from his MTC email address regarding an individual in the school reception with chewing gum (outlined in para 41 above). Cllr Wanklin stated that he had sent the email from his MTC email address because his device defaulted to replying from his councillor email account, and once he had realised, he continued the matter using his personal

email as it was clearer and more appropriate to do so when corresponding as an individual.

69. The IO's asked Cllr Wanklin whether he understood that using his MTC email address could be perceived as acting on behalf of the Town Council, Cllr Wanklin stated he understood it could wrongly be assumed by some people.
70. The IO's asked Cllr Wanklin how he would describe his communication with the school in his capacity as a Town Councillor; he stated helpful and focused on the issue/s being raised.

Induction / Training

71. Cllr Wanklin stated he received no induction, training or written guidance following his co-option and this includes on the use of his MTC email address, and he is seeking 'more and more' training.
72. During the course of this investigation, the IO's were provided with a copy of an email from Cllr Wanklin to [REDACTED] where he stated "*I was told [by another Councillor] to use my Town Council email for anything community focused ... Apologies if that was misunderstood; I'm happy for [the Clerk] to steer me if I've got anything wrong.*" When asked for more information on this, Cllr Wanklin stated that shortly after his co-option he was advised by a councillor, with the Town Clerk copied in, that it was advisable to use his MTC email address.
73. The IO's asked Cllr Wanklin about communication from Cllr Birks regarding use of his MTC email address. He acknowledged that he had been approached informally at the Mayor's Bonanza, where he was advised to be conscious that the Council email should only be used when clearly instructed on Council business.

Register of interests

74. Cllr Wanklin stated he was never told of the requirement to complete and return the Register of Interests form within 28 days in accordance with the Code of Conduct. He stated it was first mentioned to him much later in the year and only informally by the PA to the Town Clerk who asked him to return it as his convenience.

The IO's directed Cllr Wanklin's attention to his acceptance of office document, which he signed on 8th May, which states that he would adhere to the code of conduct. Completing the register of interests form within 28 days is stated as a requirement of councillors in the code of conduct. Therefore, Cllr Wanklin was asked to elaborate on his position that he was never told of this requirement; however, no further information has been received from Cllr Wanklin in answer to this question.

- ██████████
75. The IO's contacted ██████████ via email on 26th November 2025 and received emailed information in response. ██████████ confirmed that Cllr Wanklin had contacted the school on more than one occasion from his MTC email address. They advised he had also used his Cllr sign off in emails where he was engaging with them in his personal capacity.
76. ██████████ outlined that it had been interested in pursuing the School Streets programme, which the school pupil parliament group had been involved in with ██████████. ██████████ advised an approach had been made by Cllr Wanklin to ██████████ without prior consultation with ██████████.
77. ██████████ provided the IO's with an email from Cllr Wanklin's MTC email address, sent on 21st July 2025, in which he stated that he had already completed consultations with parents and residents. ██████████ advised these were not shared with the school, they were not included in this consultation process, nor were they aware that parents or residents were being consulted on behalf of the school. The application form was completed on behalf of the school but not in consultation with them.
78. When asked how MTC would normally communicate with ██████████ they advised that typically, the school had been contacted either by phone or email, with communication relating to possible links and support for the school. The school provided positive examples of communication made by Cllr Birks through the central ██████████, and her attendance at a recent talk with ██████████ Pupil Parliament.
79. When asked if Cllr Wanklin's communication was in keeping with the usual MTC approach, ██████████ advised that communication with Cllr Wanklin was primarily via email and he frequently refused to attend face to face discussions. Communication was personal regarding his children and repeatedly covered areas already reviewed and addressed. ██████████ stated that communication could be personal and offensive. Within communication Cllr Wanklin often referred to reflecting the views of many parents, however, ██████████ stated this was not evidenced when they spoke to other members of the school community.
80. ██████████ advised that communication from Cllr Wanklin had caused staff and members of the school community, with parents enquiring directly about this, to question the integrity of the Town Council with concerns about Cllr Wanklin using his position to influence and intimidate.
81. ██████████ stated that communication from Cllr Wanklin had caused distress and anxiety amongst staff, who were anxious of interactions in case of accusations from him. ██████████ advised that protocols had been put in place to ensure staff felt secure, including staff always being accompanied in meetings. Staff well-being was a concern for the school as a result. The frequency of communication had caused a significant increase in workload and had diverted the school leadership team from their day-to-day duties in the school.

82. ██████ advised that communication restrictions had been put in place for Cllr Wanklin's personal methods of communication because of the nature, frequency and content of his emails which had caused offence, anxiety, and increased workload for staff. Cllr Wanklin then contacted the school from his MTC email address on two occasions after the restrictions were put in place.

████████████████████

83. As a result of additional information provided by Cllr Birks on 20th January 2026, the IO's contacted ██████ ██████ on 29th January 2026, to request information about concerns he had raised with MTC regarding Cllr Wanklin. The information provided by ██████ relates to Cllr Wanklin acting in his personal capacity, except where expressly stated otherwise.

84. ██████ outlined the nature of communication between Cllr Wanklin and ██████ which had led to a Cease-and-Desist letter being issued by ██████ in relation to his actions in his personal capacity. He advised that a contact management policy had also been put in place by ██████ Professional Standards due to the vexatious nature of his communication, restricting him to one postal letter per month.

85. ██████ advised that in October 2025, he was contacted by ██████ regarding Cllr Wanklin's behaviour towards ██████; they were in turn advised to implement their own contact management policy, due to extensive and vexatious contact, which had also prompted the academy to conduct lockdown drills because of concerns caused by Cllr Wanklin's behaviour.

86. ██████ outlined a meeting in September 2025 where ██████ briefed MTC on proposed changes to local policing; in this meeting, he stated that Cllr Wanklin, this time in his capacity as a Town Councillor, raised the same vexatious complaints as he had in his personal capacity with ██████

87. Finally, ██████ highlighted in more recent complaints made about ██████ regarding concerns over parent drop off and parking safety, Cllr Wanklin referred to '*meetings with District Councillors and a "blueprint" for school safety*'. ██████ perceived this as '*presenting his [Cllr Wanklin] involvement as linked to, or supported by, his role as a councillor*'.

88. ██████ concluded that it was "*hard to argue that these interactions had not caused some reputational impact*" on MTC.

████████████████████

89. Further to information provided verbally by Cllr Birks on 20th January 2026, the IO's contacted an MP's Chief of Staff on 29th January 2026 to request copies of any communication they had received from Cllr Wanklin. The IO's did not receive a response to this request, so have been unable to draw conclusions in relation to the information provided anecdotally by Cllr Birks.

Findings and conclusion

90. The IO's have taken into account the emails that have been shared by the individuals and organisations outlined above, including Cllr Wanklin's written response and emails, as well as the information provided verbally by Cllr Birks and MTC Clerk.
91. Whilst the details of the personal communication protocol in place with ██████ falls outside the remit of this investigation, consideration has been given to whether the MTC email address was used by Cllr Wanklin in a manner aimed to circumvent this protocol.
92. Having considered the available evidence and the information provided by the parties consulted, it is apparent that the nature and tone of Councillor Wanklin's communication and conduct have contributed to a perception that has been detrimental to, and adversely affected, the reputation of MTC.
93. Applying the civil standard of the balance of probabilities, considering the evidence outlined above and attached as appendices to this report, the IO's find Cllr Wanklin to be **in breach** of the paragraphs of the MTC Code of Conduct set out below.

94. Paragraph 1 – Respect

1.2 – I treat local authority employees, employees and representatives of partner organisations and those volunteering for the local authority with respect and respect the role they play:

The Code requires councillors to act with politeness and courtesy in their behaviour, speech, and written communications. Emails sent from Cllr Wanklin's MTC email address to ██████ and ██████ show instances where the role and actions of officers were questioned, and where Cllr Wanklin demonstrated a lack of regard for MTC procedures. In doing so, the IO's also consider the tone of these communications to show a lack of respect for Council officers.

We also find the comments from the ██████ ██████, regarding the tone of Cllr Wanklin's communications, indicate a failure to show appropriate respect both to individuals and to the roles they perform.

We are of the view that Cllr Wanklin's preparation of the School Streets Initiative, whilst seemingly well-intentioned, failed to recognise his role as a supporter of this initiative and over-stepped into the remit of work and decision-making of the ██████. We therefore consider this demonstrates a failure to respect the role of the stakeholder and his role as acting in support of, and not in place of, the stakeholder.

The IO's also note that whilst Cllr Wanklin maintained his engagement with the investigation, he made repeated procedural challenges about the recording of an interview and his subsequent use of that recording, and the basis for follow up questions which he described as being "unnecessary". Whilst he stated he was

co-operating with the investigation, the IO's found his responses in substance and tone to be challenging to authority of the investigation.

95. Paragraph 5 – Disrepute

5.1 – I do not bring my role or local authority into disrepute:

The Code sets out that a councillor's actions and behaviour are subject to greater scrutiny than those of ordinary members of the public. Councillors should be aware that their actions may have an adverse impact on themselves, other councillors, or the local authority, and may undermine public confidence in their or the Council's ability to carry out its functions.

The IO's have considered Cllr Wanklin's emails with [REDACTED] in which Cllr Wanklin referred directly to his role as a councillor, thereby drawing a direct link to MTC. On the balance of probabilities, the IO's are of the view that the nature and tone of these emails negatively affected the perception of MTC.

Additional instances were noted where the MTC email address was used in relation to matters not connected to MTC business, leading recipients to conclude that Cllr Wanklin was acting on behalf of the Council. Any conduct within those communications can thereby be perceived as the views of MTC.

Cllr Wanklin did not declare a potential conflict of interest in relation to the School Streets initiative, despite [REDACTED] indicating they did not wish to proceed with his involvement. He also did not follow MTC procedures when progressing the initiative, contributing to a negative perception of MTC's involvement in the scheme.

The observations of [REDACTED] also directly indicate that these communications had a tangible impact on their perception of MTC, demonstrating a clear reputational effect as a result of Cllr Wanklin's actions.

The volume of concerns and complaints raised with MTC regarding Cllr Wanklin's conduct further supports the view that there has been a breach of this paragraph of the Code.

96. Paragraph 6 – Use of position

6.1 – I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else:

The Code states that councillors must not use the opportunities afforded to them by virtue of their position to further their own private interests or those of others.

The IO's consider that the information provided indicates that Cllr Wanklin may have attempted to use his position improperly to his advantage.

The IO's are of the view that where an email account is provided by a Council, any use of this email account could be interpreted by the recipient of the email as

being related to official Council business. The IO's do not accept Cllr Wanklin's assertion that this is an incorrect assumption.

As part of the investigation ██████ provided information that Cllr Wanklin used his Cllr sign off when contacting ██████ on personal matters unrelated to MTC business.

Evidence was also reviewed showing Cllr Wanklin made a Freedom of Information request to ██████ officers using his MTC email address where he has subsequently stated the subject matter did not relate to MTC business.

In addition, Cllr Wanklin identified himself as a sitting councillor in an email concerning a ██████ officer, despite the matter not relating to MTC business. The telephone call referenced within that email likewise did not relate to MTC business.

Cllr Wanklin's reference to an attempt to '*deter a sitting councillor*' and using his MTC email address when the matter in question related to a personal issue, may be viewed as an attempt to use his position improperly to his advantage. If this had not been his intention, it is unclear why Cllr Wanklin made reference to his role as councillor in this context.

In correspondence with ██████, Cllr Wanklin stated that he would pursue matters '*more formally now*' in his capacity as a councillor. However, the matters referenced did not relate to MTC business and had initially been raised as a personal concern. The IO's consider that a reasonable person could perceive this as Cllr Wanklin seeking to rely on his position as a councillor to influence the progress of an issue that had not been resolved to his satisfaction when raised in his capacity as a private individual. However, it is noted that the MTC Clerk was copied into this email, and therefore arguably had opportunity to address this matter at that time.

The investigation also identified that Cllr Wanklin was subject to a personal communication protocol with ██████ which he did not inform MTC of and he did not appear to have considered there may be a conflict of interests with him working alongside the school on the school streets initiative. Communicating with the school using his MTC email address was perceived by ██████ as an attempt by him to circumvent the restrictions the school had put in place to control Cllr Wanklin's contact with staff.

This contact appears to have been made with the intention of progressing the initiative in circumstances where he also had a personal interest as a parent. This was done without progressing the matter through established MTC processes, without declaring a potential conflict of interest arising from the personal communication protocol in place with the school, and without the school having been involved in any formal consultation process.

It is concerning that Cllr Wanklin described his communication with the school in his capacity as a Town Councillor as being helpful and focussed on the issue/s being raised, which does not appear to recognise the conflict of interests involved in contacting an organisation that has purposely sought to restrict his communication.

Having considered the evidence in the round, these instances indicate the inappropriate use of MTC systems and identifiers in connection with personal matters. The reference to his role as a councillor, together with the use of the MTC email address, creates a clear association with Cllr Wanklin's official position. A reasonable member of the public would be likely to conclude that Cllr Wanklin was acting in his capacity as a councillor and as a representative of MTC in these circumstances.

97. Paragraph 9 – Interests

9.1 – I register and disclose my interests

The Code emphasises the requirement for councillors to register their interests so that members of the public, local authority employees, and fellow councillors are aware of any interests that may give rise to a conflict of interest. Failure to register or disclose a Disclosable Pecuniary Interest (DPI) may constitute a criminal offence under the provisions of the Localism Act 2011.

As set out in Appendix B to the Code, councillors are required to complete and submit their Register of Interests form within 28 days of becoming a member of the Council.

The IO's found that the form was not completed and returned within the required 28-day period, despite follow-up correspondence from MTC sent on 2nd December, 17th December and 22nd December 2025. When the form was eventually submitted on 12th February 2026 (form dated 2nd February 2026), a number of sections had been left blank. This was notwithstanding guidance provided in the email from MTC dated 2nd December 2025, which advised that where no interest existed, the word 'none' should be entered in the relevant section. In addition, the form refers to volunteering activities; however, no further information was provided to clarify the nature of this activity, including the organisation involved or whether the activity was undertaken on a freelance basis. The form also did not contain a wet signature.

Cllr Wanklin signed a declaration to observe the Code of Conduct when he completed his Acceptance of Office on 8th May 2025. In his response to the investigation, Cllr Wanklin stated that he was not aware of the Code. A follow-up question was put to him seeking clarification on this point; however, no response was received.

Given that Cllr Wanklin signed the declaration confirming that he would observe the Code at the point of accepting office, it is reasonable to conclude that he was aware of the Code and the obligations arising from it. If there was any uncertainty or lack of understanding regarding these requirements, it would have been reasonable to expect that this would have been raised with MTC at the time the declaration was signed.

98. The evidence reviewed during the investigation also indicates that Cllr Wanklin **did not** act consistently with the **Ten Principles of Public Life**, as set out in Appendix A of the Code of Conduct. In particular, the following principles are relevant:

Respect for Others

Councillors are expected to treat others with courtesy and respect in all interactions undertaken in their official capacity, including written correspondence with council officers and external parties.

During the investigation, a number of emails sent by Cllr Wanklin were reviewed. The tone and language used in this correspondence was, at times, less than respectful and appeared to challenge the role and professional responsibilities of officers/other parties. In some instances, officers were questioned in a manner that could reasonably be perceived as unnecessarily confrontational while they were carrying out their duties.

Councillors are entitled to seek clarification, raise concerns, and challenge decisions where appropriate. However, such engagement should be undertaken in a manner that remains professional and respectful of the role of officers. This investigation finds that the tone adopted in the correspondence reviewed during this investigation falls short of the standard of respectful conduct expected under the Code.

Honesty and Integrity

Councillors are expected to act with honesty and integrity and to avoid placing themselves in situations where their position as a councillor may be used, or perceived to be used, to secure an advantage in relation to personal matters.

The investigation found that, in a number of instances, the distinction between Cllr Wanklin's personal views and his role as a councillor was not clearly maintained. This created a blurring of the boundary between personal matters and official responsibilities. As a result, a reasonable observer could perceive that Cllr Wanklin was relying on, or seeking to rely on, his position as a councillor to influence or progress matters of a personal nature. Such circumstances have the potential to call into question adherence to the principles of honesty and integrity expected of councillors.

99. Whilst the investigation did not identify sufficient evidence to conclude that Cllr Wanklin breached the following paragraphs of the Code of Conduct, the evidence

reviewed does give rise to some concern in relation to these provisions. Accordingly, although no formal breach is found of the following paragraphs, it would be appropriate for Cllr Wanklin to exercise particular care in future to ensure that his conduct fully aligns with the expectations set out in the following paragraphs of the Code:

Paragraph 2 – Bullying, harassment and discrimination

2.2 – I do not harass any persons:

The investigation considered the volume and nature of emails sent by Cllr Wanklin to partner organisations and Council officers. Evidence provided by MTC, [REDACTED] indicates that the frequency and persistence of contact caused concern amongst those involved.

The Code notes that harassment may include conduct that causes alarm or distress, including repeated attempts to impose unwanted communication or contact in a manner that could reasonably be expected to cause distress.

Feedback received from external parties indicates that Cllr Wanklin's actions were experienced as distressing by some individuals. The volume and persistence of the communications therefore raise concerns as to whether this conduct was consistent with the standards expected under the Code.

Paragraph 4 – Confidentiality and access to information

4.2 – I do not improperly use knowledge gained solely as a result of my role as a councillor for the advancement of myself, my friends, my family members, my employer or my business interests:

The investigation noted that Cllr Wanklin used information obtained in his capacity as a councillor in some personal emails. Whilst personal emails fall outside the scope of this investigation for determining a breach, care should be taken to avoid blurring the distinction between personal matters and official council responsibilities. Councillors should refrain from using information obtained in their official role for personal purposes.

Paragraph 7 – Use of local authority resources and facilities

7.1 I do not misuse council resources:

The investigation has identified instances where Cllr Wanklin used his MTC email account to conduct personal business or matters unrelated to council business. MTC email accounts are provided for official council purposes and may reasonably be regarded as a council resource. Councillors are expected to ensure that such resources are used appropriately and solely for official business.

100. The investigation has been made aware of personal social media posts made by Cllr Wanklin. Whilst personal posts are outside the scope and remit of this investigation, some content has the potential to be associated with MTC.

In particular, one post included a statement inviting individuals to continue to go to him with their issues. This has the potential to raise questions of the capacity in which the offer to receive such concerns is being made.

Councillors should be mindful of their conduct in personal and official capacity, and the potential impact of personal posts and blurring of lines between their personal and official roles. It is reasonable to expect that members of the public, aware of Cllr Wanklin's position, may draw a connection to the Council and could reasonably interpret this as an invitation to approach Cllr Wanklin in his capacity as a councillor,

Recommendations

1. Training

101. It is recommended that, within three months, Cllr Wanklin undertake comprehensive one-to-one training with an appropriate third-party provider (for example, CALC) covering the role and remit of a town councillor, the correct procedures and protocols to be followed when acting in that capacity, the distinction between personal and councillor roles, and the standards of conduct expected of elected members.

Since receiving this complaint, the IO's are aware that Cllr Wanklin appears to have continued using either his Cllr sign off or MTC email in correspondence relating to personal matters or matters not directly in his remit as an MTC councillor.

This recommendation would support Cllr Wanklin in developing a clearer understanding of the role and responsibilities of a town councillor and assist MTC in promoting adherence to appropriate governance procedures and expected standards of conduct. Completing this training within three months would also support the timely cessation of inappropriate use of cllr title and resources.

102. It is further recommended that, in addition to the training outlined in paragraph 101, within three months, Cllr Wanklin undertake additional one-to-one training with an appropriate third-party provider (for example, CALC) on appropriate written communication. This training should aim to support courteous, respectful, and professional communication in all council-related correspondence. The training may include, but is not limited to, the following areas:

- Tone in written communications
- Use of inclusive and respectful language
- Managing disagreement constructively
- Understanding the impact of written communications on council cohesion and public perception
- Appropriate frequency and volume of communications
- Appropriate use of social media

This recommendation would support Cllr Wanklin in developing more effective and professional written communication and assist MTC in continuing to promote respectful working relationships, constructive dialogue, and public confidence in its governance.

103. It is recommended that Cllr Wanklin attends training, which should also be provided for all councillors, on public perception and their responsibilities in their role as elected members. The training should cover the appropriate use of social media, including personal accounts, and emphasise that members of the public will identify councillors with their official role regardless of platform. Councillors should be encouraged to consider reasonable adjustments to posts and online behaviour to reflect their responsibilities and uphold public confidence in the Council.

This recommendation would support Cllr Wanklin, and all councillors, in understanding the wider impact of their actions and communications on public perception, reinforce awareness of their responsibilities as elected representatives, and help maintain professional standards and public confidence in the Council.

2. School Streets Initiative and general communication with [REDACTED]

104. It is recommended that, should the Transport Working Group continue to operate, Cllr Wanklin should have no direct role in, or communication with, [REDACTED] in relation to the School Streets initiative or any other council-related or public interest matters involving the school. Any such engagement should instead be undertaken by an alternative representative of MTC appointed through the Council's agreed procedures. This is intended to ensure that any involvement in such matters is carried out formally on behalf of the Council and in accordance with agreed governance processes.

This recommendation would support Cllr Wanklin in maintaining clear and appropriate boundaries between his role as a councillor and matters relating to the school, thereby reducing the risk of further misunderstandings or involvement outside the Council's agreed processes.

3. Induction procedures

105. It is recommended that MTC introduce documentation to evidence the induction process for newly elected councillors. This documentation should clearly record the matters covered during induction, with a checklist that is dated and signed by both the councillor and the relevant officer to confirm that the induction has been completed and that the councillor has acknowledged their understanding of the information provided.

This recommendation would support the Council by providing an auditable record of a clear and consistent induction process for all councillors, demonstrating that key roles, responsibilities, procedures, and standards of conduct have been communicated to, and understood by, the councillor.

Our Ref ASC/ DC

11 May 2026

Councillor Nathan Wanklin
Sent by email to CLlnathanwanklin@malvern-tc.org.uk

Dear Cllr Wanklin

Audit and Standards Committee – 07.05.26
Complaint Against Councillor Nathan Wanklin – Malvern Town Council

I refer to the complaints against you which came before a standards Sub Committee of the Malvern Hills District Council Audit and Standards Committee (ASC) on 7th May 2026.

BACKGROUND

In November 2025 Malvern Hills District Council (“the Council”) received code of conduct complaints relating to your behaviour. Having assessed your initial responses, in line with our adopted procedure for dealing with conduct complaints, the Monitoring Officer (MO) and an Independent Person for standards matters made an assessment that further investigation was required.

Investigator Officers (IOs) were appointed and an investigation was commenced. Details of how the investigation was undertaken and who the IOs met are set out in the report.

The IOs found that, on balance, there had been breaches of the Code of Conduct. The IOs made recommendations in respect of their findings.

In line with the Council’s adopted procedures, the report was shared with the complainants, and yourself. You contacted the IOs setting out your reasons for not accepting the report or the findings.

As such, in line with our adopted procedures a formal meeting of the ASC was arranged to review the report and findings.

The matter was before the ASC at their meeting on 7th May 2026. The purpose of the meeting was to hear representations from yourself and the complainants and consider whether, on balance there had been a breach of the code of conduct and if so what, if any, recommendations would be appropriate.

The complainants and you were invited to attend. The Town Council Clerk and Mayor attended however, you chose not to.

At the meeting, as there had been no prior indication that you would not be attending, I, as Chair, used my discretion to delay the start of the meeting for 10 minutes in case you were running late.

Thereafter, I took the time to introduce everyone present and explain the process and the role of the members. This included explaining that the committee was made up of 4 voting members who were sitting in their capacity as Malvern Hills District Council members of the ASC and 2 non-voting members consisting of parish members. I reminded all members that they must only consider the merits of the matters that were before them at the meeting.

We were provided with a pack containing additional third party evidence which was reflected with the report. I allowed all members some time to read and review the pack. The packs were collected back at the end of the meeting to ensure that the third part data contained in the same was protected.

The MO gave a brief summary of the matter to date as set out in the agenda report. The complainants were given the opportunity to speak to the complaint and then the IO's were asked to address their views, based on their investigation, on your reasons for not accepting the report and its findings. All members were then given the opportunity to ask questions of the complainants and the IO's.

Eventually, the ASC retired to deliberate in confidential session.

FINDING

Having considered your email correspondence relating to why you did not accept the report and its findings, and having heard from the complainants and the IOs the ASC spent some time deliberating the issues and considering the details before making our findings.

The ASC carefully considered the information provided regarding [REDACTED] and how this [REDACTED] may affect the way you process information, respond to communications, and react in certain situations. We recognised that this may mean that additional support or adjustments, such as allowing more time for responses and providing information in writing, could be appropriate.

In reaching our decision, we had regard to the evidence from the Town Council, which confirmed that written documentation was provided to you, alongside both formal and informal meetings and one to one discussions. The Town Council also confirmed that it proactively reached out to you to offer help and support. In addition, the IOs set out clear guidelines and timescales, provided questions in writing, and ensured that expectations were communicated clearly.

The ASC weighed these arrangements against your written representations and concluded, on balance, reasonable and sufficient adjustments had been made to take account of your [REDACTED]. However, notwithstanding those adjustments, the ASC determined that your actions nevertheless fell short of the standards expected of a Councillor.

The ASC found that, on balance, the IO's report was fair, evidenced and balanced. We found that whilst you gave a lot of reasons for not accepting the report you provided no substantiated argument as to why the findings should not be accepted. Many of your reasoning were based on reflecting to other's responsibilities but there was no acknowledgement of your own actions and responsibility as an elected member.

The ASC unanimously agreed to endorse the report and the recommendations in full but also add some further recommendations for the Town Council to consider.

To summarise, the recommendations, as set out in the IOs report, are

1. Training on various matters for Cllr Wanklin
2. No role for Cllr Wanklin on the school streets initiative
3. The Town Council to review their induction procedures, communications policy and councillor conduct procedures

The additional recommendations from the ASC, for the Town Council are

1. Consideration should be given to introducing a social media usage policy for all members
2. Consideration should be given to introducing an IT usage policy for all members
3. Consideration should be given
 - to limiting Cllr Wanklin's access to Council stationary eg his use of the Town Council email address,
 - limiting access to Town Council offices and staff: to be by appointment only with only named points of contact etc
4. Consideration should be given to limiting Cllr Wanklin's membership to any committees, sub committees, working groups or similar

Please note the ASC decision on this matter is final and there is no further recourse in respect of our finding.

A redacted copy of this letter will be sent to the Complainants to confirm conclusion of this matter. It will be for the Town Council to decide whether they accept the decision of the ASC and how or if they take forward any of the recommendations.

Yours sincerely



Dean Clark
Audit and Standards Committee Chairman
Malvern Hills District Council