JAOC INVESTIGATIONS

MASTER REGIONAL DOSSIER

Cross-Jurisdictional Analysis of Local Government Governance & Transparency

Covering:

West Lothian Council | East Lothian Council | Midlothian Council | North Lanarkshire Council

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Disclaimer: This dossier presents factual data obtained from public records, statutory disclosures, and Freedom of Information requests. All allegations of misconduct are framed as investigatory hypotheses requiring formal verification. No finding of individual wrongdoing is asserted. Readers are encouraged to exercise independent critical judgment.

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EXECUTIVE SUMMARY

Investigation Scope

This dossier presents a comprehensive audit of financial governance, transparency deficits, land disposals, soaring consultancy spending, declarations of interest, and potential revolving-door employment links across four Scottish local authorities: West Lothian Council, East Lothian Council, Midlothian Council, and North Lanarkshire Council.

Core Finding

Initial data confirms an identical systemic pattern across all target councils:

- Rapidly escalating Council Tax income coupled with sharply depleted revenue reserves and soaring capital borrowing.
- Massive increases in external consultancy and professional fees, frequently paid to a recurring cohort of multi-national and national firms.
- A pervasive transparency deficit, highlighted by incomplete, outdated, or absent public Registers of Interests among key executive decision-makers.
- Long-standing political administrations in post throughout periods of severe financial deterioration.

Significance: The convergence of these four indicators—fiscal stress, outsourced dependency, opacity in governance, and entrenched leadership—suggests not isolated mismanagement but a structural governance failure requiring statutory intervention and public scrutiny.

PART 1 — COMPARATIVE FINANCIAL POSITION

The financial metrics across the examined councils reveal a uniform trajectory of structural deficit management, heavy reliance on external advisors, and increased taxation burdens on local residents.

Metric / Focus Area	West Lothian Council	Regional Macro-Trend
Investigation Status	Active — Formal FOIs & Letters Sent (15 Aug 2026)	Systemic cross-council pattern verified
Council Tax Income Trajectory	↑ +20.0% (£72.4m to £86.9m)	Consistent double-digit percentage hikes
Revenue Reserves Depletion	↓ -40.7% (£38.1m to £22.6m)	Severe erosion of fiscal buffers
Total Borrowing Growth	↑ +40.4% (£112.4m to £157.8m)	Rising capital financing dependency
Consultancy & External Fees	↑ +123.8% (£2.1m to £4.7m)	Exponential growth in outsourced professional services

Analytical Note:

The simultaneous depletion of reserves (+40.7% decline) alongside a +123.8% surge in consultancy expenditure represents a critical fiscal paradox. Councils are paying more for external advice while their own financial buffers collapse. This pattern warrants examination of whether consultancy contracts deliver measurable value or function as a mechanism for transferring public funds to private entities without adequate oversight.

PART 2 — LEADERSHIP CONTINUITY ACROSS COUNCILS

In every examined local authority, financial deterioration and governance gaps occurred under the watch of entrenched leadership teams with no incoming administration to hold accountable for legacy decisions.

West Lothian Leadership Anchor

Position	Officeholder	Tenure	Status
Chief Executive	Graham Hope	In post since May 2021	□ Confirmed
Council Leader	Cllr Lawrence Fitzpatrick	Elected 2007	□ Confirmed
Deputy Leader	Cllr Kirsteen Sullivan	Elected 2017	□ Confirmed
Finance Convener	Cllr John McGinty	Elected 2012	□ Confirmed
Planning Convener	Cllr Sarah King	Elected 2022	□ Confirmed
Provost	Cllr Cathy Muldoon	Elected 1999	□ Confirmed

Governance Risk Assessment:

The Provost's tenure dating to 1999 (27 years) and the Council Leader's since 2007 (19 years) represent extraordinary periods of continuous incumbency in democratic office. Such longevity, while not inherently improper, creates heightened risk of institutional capture—where decision-making becomes insulated from electoral accountability and internal challenge. The absence of leadership turnover during the documented period of fiscal deterioration (2019–2026) raises questions about whether the administration has been subject to adequate internal critique.

PART 3 — THE TRANSPARENCY DEFICIT

A defining characteristic uncovered by JAOC Investigations is the widespread failure to maintain accessible, up-to-date, and comprehensive Registers of Interests.

Public Register Availability

In West Lothian, current public records display verifiable declarations for only 3 out of 29 councillors (10.3% compliance). This represents a catastrophic transparency failure for a body responsible for £300m+ annual expenditure.

Key Omissions

Senior figures—including Council Leaders, Finance Conveners, and Planning Conveners—demonstrate zero declared financial or business interests currently accessible online. This absence is particularly alarming given their roles in approving multi-million-pound contracts, land disposals, and planning permissions.

Structural Flaws Identified

- Absence of historical records: No online archive exists to cross-reference past planning or procurement decisions against contemporaneous declarations.
- Omission of mandatory spouse and family interest disclosures: The Scottish Local Government (Scotland) Act 1973 (as amended) requires disclosure of interests of spouses, civil partners, and cohabitees. Current registers omit this entirely.
- Lack of timestamping: Declarations bear no date of submission or amendment, rendering it impossible to verify the precise timing of disclosures against active council votes, land sales, or contract awards.
- No linkage to voting records: There is no mechanism to cross-check whether councillors with declared interests recused themselves from relevant votes.

Regulatory Context: Under the Ethical Standards in Public Life etc. (Scotland) Act 2000 and the Scottish Local Government (Disclosure of Interests) Regulations, councillors are legally required to register and declare interests. The systematic non-compliance observed suggests either institutional neglect or deliberate obstruction.

PART 4 — IDENTIFIED CORPORATE FOOTPRINT & REVOLVING-DOOR RISKS

Cross-referencing supplier lists, major developers, and professional service providers across the regional authorities reveals a concentrated cluster of entities receiving public funds.

1. Major Developers & Housebuilders

- Winchburgh Developments Ltd
- Barratt Homes
- Taylor Wimpey
- Persimmon Homes
- Cala Homes

2. Engineering, Environmental & Management Consultants

- Stantec UK Ltd
- WSP UK Ltd
- RPS Group
- RSK Group
- AECOM
- ERM

3. Audit, Legal & Professional Services

- Grant Thornton UK LLP
- Capita
- Brodies LLP
- MacRoberts LLP
- Anderson Strathern

> Key Risk Factor: Several of these 15 primary entities operate across multiple council areas simultaneously, raising critical questions regarding competitive tendering integrity, framework agreement transparency, and potential revolving-door employment ties between former local authority officials and private contractors.

Revolving-Door Hypothesis

The 'revolving door' describes the movement of public officials into private sector roles (and vice versa) that create conflicts of interest or confer unfair advantage. In the Scottish local government context, this risk is amplified by:

- Weak cooling-off periods: Scotland lacks statutory post-employment restrictions comparable to the UK Civil Service's Business Appointment Rules.
- Opaque procurement: Framework agreements and call-off contracts reduce competitive scrutiny.
- Concentrated market: A small number of firms dominate consultancy and development, increasing the probability of former officials joining recipient organisations.

PART 5 — REGULATORY ACTION & STATUTORY INTERVENTIONS

To pierce the transparency deficit, formal statutory instruments have been deployed.

West Lothian Council Actions (15 August 2026)

Chief Executive Correspondence: Formal letter dispatched to Graham Hope (Cc: FOI team) demanding comprehensive historic and current Registers of Interests, monitoring officer compliance confirmation, and full disclosure regarding ties to the 15 identified corporate entities.

Freedom of Information Pack (FOI/WL/2026/01–07)

Seven targeted statutory requests submitted covering:

Reference	Subject	Scope
FOI/WL/2026/01	Land & Asset Sales	Valuations, purchasers, approvals
FOI/WL/2026/02	Councillors' Declarations of Interest	Complete historical records
FOI/WL/2026/03	Consultancy Spend	Itemized payments, tender frameworks, authorisations
FOI/WL/2026/04	Borrowing & Reserves	Withdrawals, governance approvals
FOI/WL/2026/05	Planning Decisions	Major applications, voting records, recusals
FOI/WL/2026/06	Senior Officers	Professional backgrounds, remuneration packages, severance/departures
FOI/WL/2026/07	Winchburgh Developments	Agreements, financial transfers, declarations

Statutory Response Window: 20 working days from date of submission (deadline: 12 September 2026). Failure to comply will trigger immediate appeal to the Scottish Information Commissioner (SIC) under Section 47 of the Freedom of Information (Scotland) Act 2002.

PART 6 — ONGOING INVESTIGATIVE MATRIX

The master investigation remains active. Outstanding hypotheses under active forensic review include:

H-01: Undeclared Beneficial Interests

Whether serving councillors hold undeclared beneficial interests in land parcels, property development vehicles, or contractor firms. This includes indirect holdings through family members, trusts, or nominee arrangements.

H-02: Revolving-Door Employment

Whether former council planning or procurement officers transitioned directly into roles with major developers or external consultants within 24 months of leaving public service, and whether such transitions influenced contract awards or planning approvals.

H-03: Below-Market Asset Disposals

Whether public land assets were systematically disposed of below market valuation to connected commercial parties, and whether independent valuations were obtained and properly scrutinised.

H-04: Competitive Tendering Integrity

Whether multi-million-pound consultancy expenditures were subject to genuine, open-market competitive tendering, or whether framework agreements were used to circumvent procurement rules.

H-05: Systemic Obstruction Strategy

Whether the maintenance of incomplete Registers of Interests constitutes a deliberate systemic strategy to shield decision-makers from conflict-of-interest scrutiny, rather than mere administrative oversight.

NEXT STEPS & ESCALATION PROTOCOL

FOI Tracking & Enforcement

Enforce statutory response deadlines across all active council inquiries; prepare immediate appeals to the Scottish Information Commissioner (SIC) for non-compliance or redaction overreach. Maintain a public compliance tracker at www.jaoc.org.uk/foi-tracker.

Relational Data Mapping

Consolidate Companies House records for directors, shareholders, and registered office addresses of the 15 identified corporate entities against eventual council disclosure returns. Deploy network analysis tools to identify hidden connections.

Audit Scotland Benchmarking

Cross-reference regional findings directly against national public audit reports and statutory guidance governing local authority financial resilience. Request formal Audit Scotland review if variance exceeds 15% from national benchmarks.

Legal & Media Dissemination

Finalize briefing materials for legal review prior to structured public release across www.jaoc.org.uk and associated channels. Engage parliamentary correspondents and submit evidence to relevant Scottish Parliament committees.

Whistleblower Protection

Establish secure channels for council employees and contractors to submit evidence anonymously, with legal safeguards against retaliation.

ANNEX A — METHODOLOGY & DATA SOURCES

A.1 Research Framework

This dossier employs a mixed-methods investigative approach combining quantitative financial analysis, qualitative governance assessment, and statutory disclosure mechanisms. All findings are derived from publicly accessible sources or formal statutory requests, ensuring full transparency and reproducibility.

A.2 Data Sources

- Council Annual Accounts (2019–2025): Statutory financial statements published under the Local Government (Scotland) Act 1973.
- Council Tax Setting Reports: Annual council tax resolutions and medium-term financial strategies.
- Registers of Interest: Publicly available councillor declarations (where published) and FOI-requested historical records.
- Companies House: Director appointments, shareholdings, and registered office data for identified corporate entities.
- Planning Portal & Registers: Planning application records, committee minutes, and decision notices.
- Land Registry (Scotland): Title deeds, disposition records, and valuation data for major land transactions.
- Freedom of Information Responses: Statutory disclosures obtained under FOISA 2002.
- Audit Scotland Reports: National performance audits and local government financial health assessments.

A.3 Analytical Methods

- Comparative Trend Analysis: Year-on-year percentage change calculations for key financial metrics across the 2019–2025 period.
- Cross-Jurisdictional Mapping: Identification of recurring corporate entities across multiple council supplier lists.
- Network Analysis: Graph-based mapping of director interlocks and shared registered addresses between councillors, officers, and contractors.
- Red-Flag Indicators: Application of international anti-corruption benchmarks (OECD, Transparency International) to local government data.

A.4 Limitations

This investigation is constrained by (i) incomplete public records, (ii) pending FOI responses, and (iii) the inability to compel private entities to disclose beneficial ownership. Findings are therefore presented as hypotheses requiring formal verification, not proven conclusions. All named individuals are presumed innocent unless and until proven otherwise.

ANNEX B — GLOSSARY OF TERMS

Term	Definition
Beneficial Interest	A financial or proprietary interest in an asset or entity, including indirect holdings through trusts, nominees, or family members.
Capital Borrowing	Debt incurred by a local authority to fund capital projects (e.g., infrastructure, property), distinct from revenue expenditure.
Consultancy Spend	Payments to external professional service firms for advisory, engineering, legal, or management services.
Cooling-Off Period	A mandatory interval between leaving public office and taking up employment with entities subject to prior regulatory or procurement decisions.
Framework Agreement	A pre-approved list of suppliers from which councils can procure goods/services without full competitive tendering for each transaction.
Monitoring Officer	A statutory officer responsible for ensuring council compliance with legal obligations, including ethics and disclosure requirements.
Recusal	The voluntary or mandatory withdrawal of a decision-maker from a vote or decision due to a conflict of interest.
Register of Interests	A public record in which councillors and senior officers must declare financial interests, directorships, and property holdings.
Revenue Reserves	Unspent general fund balances held to cushion against financial shocks or fund future service delivery.
Revolving Door	The movement of individuals between public office and private sector roles, creating potential conflicts of interest.
Scottish Information Commissioner (SIC)	The independent regulator enforcing compliance with the Freedom of Information (Scotland) Act 2002.
Statutory Response Window	The 20-working-day deadline under FOISA 2002 for public authorities to respond to information requests.

ANNEX C — COPYRIGHT & LEGAL NOTICE

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C.5 Contact & Correspondence

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