

REPORT

EXECUTIVE SUMMARY

On 10 August 2011 there was a meeting of the core group of Wiltshire Involvement Network at the Potterne Wick Scout Centre. During the meeting a Core Group member took exception to a phrase used by the chair and a discussion occurred between some members of the group. The member made a complaint to Wiltshire Council Officers and an investigation was commenced.

The investigation was concluded. There has been dispute about the complaint, the investigation and the outcome. A review was undertaken in respect of the circumstances surrounding these events to establish whether Wiltshire Council's actions have been appropriate and to make recommendations for any improvements in the future.

The series of events that transpired in this matter are each unusual which would allow one to describe the overall process as unique. This series of events included the fact that the host organisation's contract had recently been terminated. During the hiatus and before the replacement host organisation had been appointed an incident occurred which raised issues of equality and diversity which potentially affected diversity which potentially affected four different organisations. There is also the failure of an email to reach the WIN Chair which resulted in what was an apparent miscommunication.

The review has the benefit of hindsight and hindsight always provides twenty/twenty vision. The review does not cast any fault on any particular person or officer.

The review has identified the following: -

- a. There was no host organisation in place for oversight of WIN at the time of the incident contrary to a statutory duty imposed on Wiltshire Council.
- b. The making of the complaint to Wiltshire Council was appropriate.
- c. The decision by Wiltshire Council to accept and carry out an investigation into the complaint regarding equality and diversity was appropriate however best practice was not followed as WIN was not consulted before the commencement of the investigation.
- d. There was a failure to follow the rules of natural justice as the persons the subject of an investigation were not given an opportunity to make representations on the allegations.
- e. The investigation report does not set out the tests applied by the investigator and therefore it is difficult for the parties to be satisfied that all relevant considerations were taken into account.

- f. The decision to suspend contact was inappropriate and potentially in breach of a statutory duty imposed on Wiltshire Council.
- g. It would be difficult for any re-investigation to achieve finality whereby the parties would be able to go forward.

The review makes the following recommendations: -

- 1. The Investigation report dated 31 August 2010 be withdrawn.
- 2. A full review be undertaken of the structure/governance/decision making process of the LINK arrangement to establish whether there is clear and appropriate governance processes in place including the following: -
 - a. Dealing with Equality and Diversity issues and in particular complaints concerning the same.
 - b. Dealing with governance/decision making if for any reason an appointed host organisation or third party is no longer in place.
- 3. A review of Wiltshire Council's policies and procedures when dealing with complaints made to the Council about third party bodies with which Council have involvement to ensure that there are clear guidelines for Officers when dealing with these issues.
- 4. The reviews set out in 2 and 3 above then form a template for a staged review of other third party arrangements within Council.
- 5. A reminder/training to all staff to obtain legal advice at an early stage when dealing with situations which involve complexity, political sensitivity and or governance arrangements with third parties.

INTRODUCTION

On 10 August 2011 there was a meeting of the core group of Wiltshire Involvement Network at the Potterne Wick Scout Centre. During the meeting a Core Group member took exception to a phrase used by the chair and a discussion occurred between some members of the group. The member made a complaint to Wiltshire Council Officers and an investigation was commenced.

The investigation was concluded. There has been dispute about the complaint, the investigation and the outcome and I have been asked to review the circumstances surrounding these events to establish whether Wiltshire Council's actions have been appropriate and to make recommendations for any improvements in the future.

TERMS OF REFERENCE

1. To establish the legal relationships between:
 - a. Wiltshire Council and Wiltshire Involvement Network (W.I.N).
 - b. Wiltshire Council and Wiltshire and Swindon Users Network(W.S.U.N)
 - c. W.S.U.N and W.I.N.
2. To establish the circumstances surrounding the Complaint detailed in an investigator's report dated 31 August 2011 including why Wiltshire Council investigated this complaint and whether the investigation carried out followed an appropriate process.
3. To establish the circumstances leading to the suspension of contact with WI.N.
4. To provide recommendations based on the facts established as to a process for resolving such complaints in the future.

SCOPE OF ENQUIRIES

I have reviewed the files of the Wiltshire Council Department of Community Services relating to this incident. I have spoken to the Complainant and the Chair and Vice Chair of WIN. I have also spoken with the Service Director, Strategy and Commissioning with the Department for Community Services and the investigating officer. I have also referred to Department of Health Guidance on Local Involvement Networks (LINKs).

WILTSHIRE INVOLVEMENT NETWORK

The purpose of a LINK is to give everybody in the community a chance to say what they think about their local care services and to give people the chance to check how care services in their community are planned and run and to provide feedback of what people have said about services so that things can change for the better.¹ The Wiltshire

¹ Department of Health guidance – Local Involvement Networks explained.

Involvement Network (WIN) was formalised at a public meeting in September 2008 as the Wiltshire LINK.²

The legislation³ required Wiltshire Council to arrange for a host organisation separate from itself to be a body at “arm’s length” from the Council and for that host organisation to assist in the set up of governance arrangements for the LINK. It was anticipated that the Local Authority would be the funder, the host organisation would provide the support for the LINK at arm’s length from the Authority and the LINK would be responsible for establishing its own governance frameworks including dealing with complaints, communications between participants, use of resources and establishing a code of conduct.

In October 2008 HAP UK contracted with Wiltshire Council to be the host organisation for WIN. HAP UK was the Host organisation until its contract was terminated prior to 1 August 2010.

I have been unable to identify a formal legal structure for WIN. However WIN has identified that it does have formal governance procedures in place. I have been supplied with copies of WIN Standing Operational Procedures, Core Group Member Role, Conflict of Interest Policy, The LINK’s Complaints Policy and a document headed HAP UK draft Equality and Diversity Policy (WIN version). WIN Management advised me that these documents were all adopted by WIN whilst HAP UK was fulfilling its host role and were applicable to WIN.

I have therefore treated WIN as an unincorporated Society of the 20 core group members governed by the above documents separate from Wiltshire Council.

WILTSHIRE AND SWINDON USERS NETWORK

Wiltshire and Swindon Users Network (WSUN) is a voluntary organisation set up as a not for profit company limited by Guarantee, Registered in England and Wales No 2870293.⁴ It is therefore a stand alone legal entity separate from the Council.

As at 10 August 2010 WSUN and Wiltshire Council had not entered into a formal agreement for WSUN to provide host services for WIN. However it was intended at that time by Council that WSUN and Age UK would take over the host role in the future.⁵

Therefore at the time of the WIN meeting there was no formal host organisation in place. The signed host agreement between Wiltshire Council and WSUN is dated 15 February 2011 but indicates a start date of 1 August 2010.

THE RELATIONSHIP BETWEEN THE PARTIES AS AT 10 AUGUST 2010

Unfortunately it is not clear what the agreed relationship was at this time. It is clear under the legislation that Wiltshire Council was the funder and WIN was an un-incorporated society charged with monitoring health and social care provisions within Wiltshire.

However there was no clearly defined host organisation for WIN; a requirement under the legislation. WSUN and Age UK were jointly proposed host organisations but this arrangement had not been finalised.

² Wiltshire Council Health Overview & Scrutiny Committee 19 March 2009 agenda item 10.

³ The Local Government and Public Involvement in Health Act 2007

⁴ WSUN Website

⁵ WIN minutes of meeting 10 August 2010.

It would appear that Council Officers attending the WIN meeting considered themselves as merely observers but there is a question whether due to the fact that the host organisation was not in place they may have been obliged to fulfil a greater role to ensure that Wiltshire Council fulfilled its statutory duties.

Under legislation in place at the time the Council was obliged by law to ensure a host organisation for WIN was in place to oversee and assist WIN. Without a host organisation the legislation was not being complied with.

The legislation is silent as to what would happen if for any reason the contract between the Council and the host organisation was terminated however logic and common sense would suggest that the Council may have had to step in as the host until a new host was appointed to ensure the continuity of the LINK which was a statutory duty on the Council.

THE COMPLAINT

The WIN meeting took place between 10.30am and 12.30 am on 10 August 2010. After the meeting but on the same day the Department for Community Services received a telephone call about events at the meeting. This message identified concerns over a comment made and the response from members of various groups. The telephone message requested the equality and diversity policies for WSUN and Age UK and asked for a complaint form.

The verbal complaint was followed up with a detailed email setting out the complainant's concerns which included allegations of potential systemic failings within WIN, WSUN and Age UK and the actions of Wiltshire Council Officers attending the meeting.

A formal complaint form was forwarded to the complainant but no completed complaint form was returned.

I do not see anything untoward in the fact that a formal complaint form was not received. The details of the complaint were communicated to Wiltshire Council in a format where the issues could be clearly identified.

THE DECISION TO INVESTIGATE

Wiltshire Council Officers had received a complaint alleging use of racist words. The complaint also raised issues as to whether Wiltshire Council and its sub-contractors had sufficiently robust procedures in place to meet the statutory duties placed on it and its sub-contractors by the Race Relations Act 1976. The complaint raised issues relating to actions of WIN itself, WSUN and Age UK Officers (the Potential Host organisations) and Wiltshire Council Officers.

The Complainant had also contacted WSUN and Age UK and identified that she wished to lodge complaints with these organisations.

Wiltshire Council in carrying out its functions was obliged to have due regard to the need to eliminate unlawful racial discrimination and to promote equality of opportunity and good relations between persons of different racial groups.⁶

Paragraph 2.9 of the statutory code on the duty to promote racial equality (which applied at the time of this incident) provided: -

⁶ Section 71 Race Relations Act 1976 this was repealed and replaced by the Equality Act 2010 on 1 October 2010.

When a public authority has a contract or other agreement with a private company or voluntary organisation to carry out its functions and the duty to promote race equality applies to those functions, the public authority remains responsible for meeting the general duty and any specific duties that apply to those functions.

Therefore the Council had a statutory duty to consider the complaint and if not vexatious act on it. I am of the opinion that it was appropriate for Wiltshire Council to take forward the complaint. I base this opinion on a number of factors: -

- a. The then operative Code of Conduct identified that notwithstanding an agreement with a third party to carry out its functions the responsibility under the Race Relations Act remained with the Local Authority.
- b. The complaint if true raised issues of potentially discriminatory words and actions and it would have been difficult for the Council to have ruled it vexatious.
- c. While it was intended that WSUN and Age UK were to become the Host organisation this agreement had not been formalised as at the date of the complaint. Therefore Wiltshire Council stood in the role of the Host Organisation.
- d. The complaint identified allegations of a systemic nature that related to the actions of Officers from all parties including WIN, WSUN, Age UK and Wiltshire Council.
- e. While the complaint relating to the words used could have been referred to WIN who had their own complaints procedure WIN was unlikely to have had the ability to investigate issues relating to WSUN and Age UK in their role as the potential host organisation nor Wiltshire Council Officers.
- f. There was a discussion between Council Officers and WSUN and Age UK officers and it was agreed that Wiltshire Council would take the lead on all complaints.

The Wiltshire Constitution requires that a complaint relating to allegations of potentially discriminatory behaviour be dealt with under stage two of the corporate complaints procedure⁷.

In Wiltshire Council's complaints procedure the investigation under stage two is to be conducted by the Corporate Complaints team. In the present case the Investigation was carried out by an experienced Head of Service who is however not one of the corporate Complaints team.

I understand that the complaint was not taken through the formal corporate complaints procedure as the thinking at the time was that it did not fit the criteria. It appears that the thinking was that Wiltshire Council should only take complaints about staff employed by Wiltshire Council and that matters relating to third parties should be considered contractually⁸.

For the reasons outlined above I do not agree with this thinking in respect of this particular complaint. However the issue highlights the difficulty when dealing with third party groups when clear governance arrangements have not been put in place or where the original arrangements between third parties break down.

⁷ paragraph 8 of Protocol VIII

⁸ Refer email of 11 February 2011 from Mark Edwards to Sue Redmond

I note that legal advice was not taken at the time of this complaint. However legal advice had been earlier sought earlier by the Department regarding a similar complaint involving a third party organisation. That legal advice was supplied when there was a clear contractual relationship with the host organisation. In that case the Host Organisation had requested assistance and the investigation was carried out following the complaints procedure but not utilising the Corporate Complaints Team for the investigation.

I have not found any evidence that Council spoke to WIN before deciding to take forward this complaint. While this failure would not invalidate the investigation I am of the opinion that this was not best practice. The alleged actions of members of the group were not necessarily the actions of the group and the fact that WIN had its own complaints procedures meant that they also could have investigated part of the complaint.

WIN could have been approached, the complaint identified with a proposal that either a joint investigation be conducted with WIN investigating the allegations relating to its members and the Council investigating the allegations relating to the other groups or alternatively seeking WIN's agreement for the one investigation to cover all groups such as had been reached with WSUN and Age UK.

THE INVESTIGATION

The report correctly identifies the complaints that had been raised.⁹ These were three in nature, firstly, an allegation that the words spoken by the chair were racist, secondly the actions of key organisational representatives were not sufficient to meet equality and diversity requirements and thirdly a response allegedly made by one of the core group members was inappropriate and failed to meet equality and diversity standards.

The files indicate that by 5pm on 11 August 2010 the complainant was advised of the name of the investigating Officer. Council's files indicate that the investigation was carried out between 11 August 2010 and 31 August 2010.

Natural Justice issues

When an allegation is made which may adversely affect an individual the allegation should be put to person with sufficient detail for them to consider the allegations and to make representations (one of the rules of natural justice). . These representations may involve more than just establishing the facts. The report identified that the persons the subject of allegations 1 and 3 were not spoken to¹⁰.

On or about 12 August 2010 an invitation was extended to the Chair of WIN to attend a meeting with the investigating officer on 18 August 2010. This invitation appears to have been accepted at 9.49am on the 12th August.

The same day the Chair of WIN emailed the investigating Officer asking for the purpose of the meeting, why it was being called and who would be attending. The investigating Officer attempted to reply immediately setting out the answers to these queries. Unfortunately the WIN Chair never received this email.

On 16 August 2010 the WIN chair again contacted Wiltshire Council Officers asking for the information relating to the meeting and indicated that they needed this information before deciding whether to attend the meeting or not. The original email of the 12th was resent to the WIN Chair on 17 August 2010.

⁹ Part B of the investigation Report dated 31 August 2011.

¹⁰ Part A of the investigation report.

Therefore by 17 August 2010 WIN was aware that there a complaint about the Core group meeting held on 10 August 2010 and that Wiltshire Council had received a complaint and was dealing with that complaint.

I have been unable to ascertain why the meeting did not go ahead. The report records that the request to attend was declined and that is the investigating officer's recollection and the chair denies this. The only documentary evidence I could find is equivocal. It is contained in an email where a Council officer reports a telephone discussion where the Chair is reported as saying that she was unwilling to attend without knowing the purpose of the meeting (which is understandable) and that she had apologized and that as far as she was concerned the case was closed.

It is apparent on the documents that both parties were aware that the meeting on 18 August 2010 was not going ahead. However there appears to have been a miscommunication as why it was not going ahead.

Unfortunately there does not appear to have been any follow up to re-arrange this meeting or to put the specific allegations to the Chair. This should have been done to ensure that rules of natural justice were met.

In respect of the person the subject of allegation 3 the report merely records that the investigator has been unable to meet with the subject. There is no documentary evidence to record why this was so. The investigator's recollection was that this person had also declined to meet however this is not recorded within the files and is not reflected within the report.

The same considerations in respect of the rules of natural justice would apply in respect of this allegation and therefore I would have expected this person to have been spoken with or at the least for the allegations to be put to them and for them to be invited to make any representations.

The failure to ensure the rules of natural justice had been met would be likely to invalidate the report itself.

Referral of complaint/draft report to persons the subject of the complaint:

This is a different aspect to that set out above under the heading Natural Justice. This relates to two aspects; the first being a failure to identify to WIN Officers that a complaint had been made and secondly once the investigation had been concluded providing a copy of the draft report to WIN for their comment before finalising the report.

Identification that Complaint made:

I have already identified a failing in best practice to refer the complaint to WIN at the outset in the section dealing with the decision to investigate,

WIN has complained that they were not aware of the complaint until they received the concluded report on or about 16 November 2010. In strict terms WIN and/or its Officers were or should have been aware that a complaint made been made by 17 August 2010 when the chair received the investigator's email (refer detail above).

However this communication merely identified a complaint had been made. It did not identify the specifics of the complaint. Unfortunately due to the failure to meet no further details were supplied to WIN or its Officers until 16 November when the Host Organisation shared the completed report with the WIN Chairs.

While I do not consider this oversight fatal to the report I do consider it not good practice as it is important that any one the subject of a complaint is aware that the complaint has been received the basic detail of the complaint and the fact that it is being investigated as a formal complaint.

Referral of draft report to WIN:

The report was referred to the complainant and amended as a result of comments made by the complainant on two occasions (15 September and 19 October).

On occasions it is acceptable to refer a draft report to a complainant to ensure that the report fully covers the issues that the complainant has raised and that the report accurately reflects any comments made by the complainant.

However if this approach is adopted then the terms of the referral need to be carefully communicated to the complainant and any amendments and the reasons for the amendment need to be carefully and accurately documented to ensure that no suggestion of bias or influence can be sustained.

While on occasions it is also acceptable to refer a draft report to a person the subject of a complaint this would normally be when the facts are particularly complex and the subject has been spoken to. Again the draft report would be provided for the purpose of ensuring that the report accurately reflects any comments made by the complainant.

In this case as there had been a failure to give the subjects an opportunity to make representations I therefore would not have expected the draft report to be referred to them as a draft as there had not been any comments made that needed the accuracy checked.

THE DECISION

In any investigation the test that is to be applied should be identified. It allows both the complainant and the person/persons the subject of the complaint to know exactly what standard is being applied. In the investigator's report the investigator has not identified the test that she applied when reaching her conclusions.

As the meeting occurred in August 2010 section 3A of the Race Relations Act 1976 would have been applicable.

The test that should have been applied is whether having regard to all the circumstances, including in particular the perception of the receiver of the words or actions the conduct could reasonably be considered to have violated another's dignity or created an intimidating, hostile, degrading, humiliating or offensive environment.

Therefore all the circumstances have to be considered including the perception of the recipient. I am of the opinion that part of this test would be a consideration as to whether it is a reasonably held perception.

A similar test is prescribed in section 26 (1), (4) & (5) of the Equality Act 2010 which replaced the Race Relations Act on 1 October 2010. This provision is in similar terms to s3A of the Race Relations Act 1976 however it specifically requires consideration of whether it is reasonable for the conduct to have that effect.

I am not tasked with re-investigating the complaint however in reviewing the original complaint I do need to consider whether the investigator's decision has followed a lawful process.

The investigating Officer has advised that the test that she applied was “were words said that offended somebody?” The investigating officer indicated she then considered all the circumstances as to the reasonableness. The investigating officer felt that the resistance to an apology was a factor to take into account.

While the term “jungle drums” could, at first glance, meet the tests required under either equality and diversity legislation as somebody could feel humiliated or offended by the term’s use it is impossible for me to conclude whether the conclusions reached by the investigator on the facts of this case are or are not sustainable as neither person subject to allegation 1 or 3 was given the opportunity to make representations on the specific allegations. I am therefore unable to have “regard to all the circumstances” as required by section 3A.

The investigation report is signed off by the Head of Service tasked with conducting the investigation. I have not found any documentation to confirm whether it was or was not placed before the Corporate Leadership Team for confirmation before sign off. The investigating Officer confirmed that she had referred the report to the lead officer before signing it off.

THE SUSPENSION

Council officers were faced with an investigator’s report which had determined that there were unresolved equality and diversity issues. Council Officers were trying to engage with WIN Officers to address these issues. WIN officers had made it plain that they did not accept the findings of the investigation and therefore were not prepared to meet for several months.¹¹.

On 14 January 2011 a letter was sent to the WIN Chair. I set out the contents of this letter in full: -

I refer to the investigation into the complaint made regarding racist remarks at a meeting. The Council takes seriously any allegations of racial abuse.

I would like to meet with you to discuss the report into the complaint. I understand from our telephone conversation that the WIN group do not agree to the recommendations in the report.

Having discussed this within Council I must inform you that until we meet I will be suspending any contact between the existing WIN group and the Council. I will be discussing with Louise Rendle of WSUN how the Council and WSUN will now manage the work of the WIN.

In the meantime I have also asked WSUN to suspend all contact with the WIN.

I have asked my PA Jane Worrall, to arrange a meeting as soon as possible. The onus will be upon you to meet the Council and until this meeting occurs the Council will not be supporting the work of the existing WIN group. Jane can be contacted directly on 01225 713921.

Please do not hesitate to contact me to discuss this matter.

I have not been able to clearly establish the basis for the decision to suspend contact. There is no clear documentation as to why this decision was made nor the basis for this decision. There is an indication that the decision may have been taken because the relationship was

¹¹ Refer email of James Cawley to Mark Edwards of 6 January 2011.

considered contractual in nature and therefore there were only the two options available; try to negotiate or to terminate the contract

The difficulty is that there does not appear to be clear governance arrangements relating to Wiltshire Council's obligations when dealing with equality and diversity issues relating to all three organisations (the LINK, the host organisation and Wiltshire Council). This compounded the difficulty that the Officers faced.

I am concerned however that the decision to suspend contact may have compromised Wiltshire Council's ability to fulfil the statutory duty imposed on it. Wiltshire Council was obliged to put in place provision for hosting a LINK. The suspension of contact meant that WIN was left without any host organisation.

OTHER POINTS:

Decision on Process to Follow

The Officers dealing with this matter were in a difficult position. Any complaint relating to equality and diversity must be treated as serious. It requires sensitive handling because it can generate strong emotions. A complainant can feel intimidated, dis-empowered and/or minimised. A person the subject of the complaint can feel that an unfair allegation has been made against them and/or their own cultural heritage is being challenged. At the same time the Officers were trying to maintain equilibrium in an organisation which was statutorily set up for the public good.

It is therefore important that the Officers decide at the outset the progress of the investigation and what their role is. Is it to attempt conciliation/reconciliation or is it to follow a due process. On occasion the communications appear to have blurred this line thereby creating different expectations from the parties as to the process.

Seeking Legal Advice

The Council files show that the Legal Unit at Wiltshire was only contacted in this matter on 28 January 2011. This was after the investigation had been completed, a decision made on suspension and the parties had become polarised.

Several opportunities were missed to seek legal advice which may have minimised the difficulties that ensued. There were: -

- a. At the time of receipt of the complaint. I note that historic legal advice had been received on a similar complaint which the Officers relied upon. However the circumstances were different with no Host Organisation in place and therefore that advice in its entirety would not have applied.
- b. At the time of appointment of the investigator or during the investigation which would have assisted the investigator to obtain advice on the test to be applied, the rules of natural justice and consideration and methodology for referring the draft report to the complainant/the person the subject of the complaint.
- c. At the time of the decision to suspend contact which would have established whether there was a legal basis for such suspension and the appropriate form of delegation for such a decision to be made.

Benefit of Hindsight:

This review has been completed with the benefit of hindsight and with the benefit of the increased knowledge of the parties and the issues faced. This review is not intended as a criticism of any person but has rather been an examination of the systems in place as at 10 August 2010.

It is apparent that parties have become polarised with their respective views as to whether the words used are or are not racist. It would be difficult for any re-investigation of this issue to achieve finality where the parties would be able to go forward.

The complainant's original complaint rightly focussed on wishing to ensure appropriate equality and diversity policies and procedures were in place with any third party groups linked with Wiltshire Council and I would recommend that this is the appropriate way forward.

The host organisation is now in place. LINK's are an important check and balance within health and social care provision and therefore my recommendations have been focussed on a way forward.

CONCLUSION

The series of events that transpired in this matter are each unusual which would allow one to describe the overall process as unique. This series of events included the fact that the host organisation's contract had recently been terminated. During the hiatus and before the replacement host organisation had been appointed an incident occurred which raised issues of equality and diversity which potentially affected four different organisations. There is also the failure of an email to reach the WIN Chair which resulted in what was an apparent miscommunication.

There is also the ambiguity inherent in the governance/complaints procedure relating to 3rd party contractors/bodies and the over arching duty imposed on public bodies regarding equality and diversity.

RECOMMENDATIONS

I would recommend the following actions: -

1. The Investigation report dated 31 August 2010 is withdrawn.
2. A full review be undertaken of the structure/governance/decision making process of the LINK arrangement to establish whether there is now clear and appropriate governance processes in place including the following: -
 - a. Dealing with Equality and Diversity issues and in particular complaints concerning the same.
 - b. Dealing with governance/decision making if for any reason an appointed host organisation or third party is no longer in place.
3. A review of Wiltshire Council's policies and procedures when dealing with complaints made to the Council about third party bodies with which Council

have involvement to ensure that there are clear guidelines for Officers when dealing with these issues.

4. The reviews set out in 2 and 3 above then form a template for a staged review of other third party arrangements within Council.
5. A reminder/training to all staff to obtain legal advice at an early stage when dealing with situations which involve complexity, political sensitivity and or governance arrangements with third parties.

F.C.CAIN
Barrister
Head of Legal Services and Deputy Monitoring Officer