

Private and Confidential

Investigation into a Code of Conduct
complaint regarding Cllr Moriah Priestley
of Milton Keynes Council

August 2020

OJB 38149.0011

Investigation Report

Introduction

1. This is a report into two complaints referred for investigation by the Standards Assessment Sub-Committee of Milton Keynes Council (“the Council”). Both complaints were made by Dr Chinwe Osuchukwu (“the complainant”) against Cllr Priestley.
2. A third complaint and part of one of these two complaints were not referred for investigation by the Standards Assessment Sub-Committee.
3. The complaints are attached as part of the Appendix. The Monitoring Officer of the Council has asked me to investigate the following matters referred by the Sub-Committee:
 - 3.1 *Did the subject member breach the Code of Conduct by failing to enter their interests correctly on the Members Register of Interests? This includes consideration of whether the operations of an incorrectly disclosed business within the Council also led to a breach of the Code.*
 - 3.2 *Did the subject matter breach the Code of Conduct by allowing a family member to contact the complainant?*
4. I am a Solicitor of the Senior Court of England and Wales; I qualified in 1985. Since then I have had a career in the public sector, primarily in local government where I have held such roles as Monitoring Officer, Head of Legal Services, Corporate Director and Chief Executive. During my career I have carried out many investigations into Code of Conduct and other investigations and I am completely independent of the Council and of the parties concerned.
5. I was asked to conduct and complete this investigation in a very short period of time and I am most grateful to the parties involved, especially Cllr Priestley and Dr Osuchukwu for their very kind cooperation and assistance throughout, which enabled me to do this and which was very much appreciated by me.

Background

6. Cllr Priestley is an elected member of the Council. She was elected to a position as councillor for the Central Milton Keynes ward in May 2018. Between May 2014 and May 2015, she was also a member of the Council, for a different ward. She is a management consultant.
7. Shortly after Cllr Priestley was elected to the Council in May 2019 she was appointed by the Leader as a Cabinet member with the portfolio for economic growth and partnerships; in May 2020 she stood down from this role as it was proposed that she was to be nominated and (subsequently, presumably) elected as the Deputy Mayor with the expectation of going on to become the Mayor the following year. However, on the eve of her election complaints were received which meant that her appointment did not proceed, and I understand that at present this is on hold pending a proposed motion at the forthcoming Council meeting to elect the deputy Mayor.
8. Case law has established that the appropriate evidential level which relates to a Code of Conduct complaint is that of the “*balance of probabilities*” test which is the civil standard of proof; in essence this means “is it more likely than not” that what is alleged did or did not occur; and involve a breach of the Code. Accordingly, when I have considered this matter it is against that standard; and I have considered the strength of evidence in respect of the allegations against that test.

Findings

9. *I find that the Code applies to the first allegation*
10. *I find that in respect of the first allegation there is sufficient evidence that Cllr Priestley failed to declare her interests correctly on the Members Register of Interests to justify a finding that there was a breach of the Code.*
11. *I make no finding in relation to the question of whether the operation of an incorrectly disclosed business led to a breach of the Code*
12. *I find that in respect of the second allegation there is some doubt as to whether the Code applies with regard to the disclosure of the telephone number, as it is not clear that this was only supplied to Cllr Priestley in her member role, given the other involvement between her and the complainant; nor that this was confidential information where the duty was owed. I therefore do not feel that there is sufficient evidence to justify a finding of a breach of the Code in respect of this allegation.*

The first allegation.

Did the subject member breach the Code of Conduct by failing to enter their interests correctly on the Members Register of Interests? This includes consideration of whether the operations of an incorrectly disclosed business within the Council also led to a breach of the Code.

13. Under the provisions of the Milton Keynes Code of Conduct, which follows the requirements of the Localism Act 2011 and the Disclosure of Pecuniary Interests Regulations 2012, members are required to register their interests within 28 days of election and within 28 days of the member becoming aware of a change. Members are informed that failure to declare an interest may be a criminal offence.
14. Cllr Priestley was re-elected as a member of the Council at the Council elections held on 3 May 2018. This means that a member elected or re-elected at those elections should have completed their Register of Interests by the beginning of June 2018.
15. I have been provided with four separate copies of the Register of Members Interests for Cllr Priestley. These are attached in the Appendix.
16. The first is dated 11 May 2018, and so would have been completed, as required, shortly after Cllr Priestley was elected. Cllr Priestley declares, in Interest 1 i.e. *“Employment office trade, professional vocation carried out by her and by her spouse or civil partner for a profit or gain”* without any detail other than to declare that these interests are *“management consultant and teacher”*. (I understand that Cllr Priestley’s husband is a teacher.) In the part of the Register which deals with other interests (voluntary additions) Cllr Priestley has recorded the West Bletchley Parish Council and the Bethesda Social Enterprise Sparkles Charity.
17. The second Register of Interests is dated 28 May 2020 and in this copy Cllr Priestley, has added, under Interest 1 *“management consultant and leadership coach; teacher”*. Under the other Interests section, she has noted the *“Bethesda Social Enterprise Sparkles Charity and the Milton Keynes Dons Sports and Education Trust”*.
18. The third Register of Interests is dated 15 June 2020. Cllr Priestley declares at Interest 1 *“Director and management consultant and leadership coach at Fenixrising Limited and teacher”*. Her interests in the voluntary additions section remain unchanged.
19. In the fourth Register dated 4 July 2020 Cllr Priestley declares at Interest 1 that she is a *“director and management consultant and leadership coach; teacher – Fenixrising*

Limited and that she is a director of Bethesda Social Enterprise Limited". Her other interests remained unchanged.

20. In interview, Cllr Priestley told me that the fact that she had not previously registered her interest in Fenixrising Limited was an "oversight". She told me that she owns Fenixrising and that she is a director of the company. In an email to me she explained that her companies were not at all connected to any council business or interests.
21. She said *"From 2016 most of my professional activity was through Fenixrising. In May 2018 it was an active company and I was invoicing consultancy assignments through it.....Not declaring the company was an oversight on my part and I wish I had an explanation. All I can say is that in the six months before I was elected in May 2018 and once I had been selected as a candidate, I was focussed on campaigning..... I was out most nights either with my husband, alone or with a few people. My head was only focussed on campaigning, nothing else"*.
22. An online search of the Companies House register carried out on 17th August 2020 shows that Fenixrising Ltd was incorporated on 5th June 2014 and that Cllr Priestley was listed as the sole company director and the holder of the only share allocation in the company. Between June 2014 and 27th July 2020, a number of entries appear on the company's register at Companies House.
23. Cllr Priestley's statement that in the six months leading up to the elections in May 2018 she was focussed on those. She said, *"From 2016, most of my professional activity was through Fenix rising. My assignment at Warwickshire did not begin till 7th September 2018 and the prior assignment through Phoenix rising ended in April 2018 so I had 7 months of no activity in my company or business as the run up to the elections came through. However, I accept that in May 2018, it was an active company and I was invoicing consultancy assignments through it."*
24. I have noted that a Charge was registered in between the company and a private equity provider on 18th December 2017, which charge was registered as satisfied on 10th January 2018. I have also noted that company accounts were provided in 30th June 2018 and 30th June 2019 and that on 2nd June 2020 Moriah Priestley was notified as a person with significant control. On July 2020 the registered office was changed, twice in the same day.
25. Whilst the turnover of the company was relatively minor, it does show that the company was active, rather than dormant, as Cllr Priestley accepts and that Cllr Priestley was

the director, and indeed the only person involved with the company as a director or shareholder, throughout this period.

26. Dr Osuchukwu has provided me with a great many documents, emails and other statements relating to transactions between herself and her company, Vinkez Consulting Limited and Fenixrising Limited. In particular, I have seen a copy of a joint venture agreement entered into on 8th November 2019 between the two companies. This is signed by Cllr Priestley on behalf of Fenixrising Limited (who lists her name as "Cllr Mrs Moriah Priestley") and Dr Chinwe Osuchukwu on behalf of Vinkez Consulting Limited.
27. Dr Osuchukwu has made significant allegations in respect of this agreement, claiming that Cllr Priestley owes her money; this is denied by Cllr Priestley. Whatever the rights and wrongs of these claims is outside my instructions, I am not investigating these and make no comments as to the issues involved; I have stressed this to Dr Osuchukwu. It is, however, relevant to the issues I am investigating that however, that leading up to this agreement signed in November 2019 it was clear that Fenixrising Ltd, owned by Cllr Priestley was active and Cllr Priestley was actively involved in it as a director. It must have been in her mind that she was a director of this company.
28. Whereas I can understand that Cllr Priestley may very well have been focused on getting elected in the six months leading up to her election in May 2018; once she was elected she completed and submitted her Register of Interests and doubtless would have been able to access advice about the completion of this from the Council if needed. In addition, as a previous elected member she would have known what was required.
29. Cllr Priestley's LinkedIn page also shows that she had worked at senior levels in local authorities and she told me that she did assignments as a management consultant for public bodies including local authorities. It is reasonable to think that she would have been familiar with the importance of registering interests. Cllr Priestley told me, by email, that she had taken advice once she had realised the errors and that although she had worked as a senior officer, she had not been involved with matters such as democratic services and the declaration of interests.
30. Fenixrising was active throughout this period and it appears unequivocally to be the case that Cllr Priestley was involved and actively pursuing businesses through it, for example the joint venture agreement with Vinkez Ltd referred to above. I therefore find

it difficult to understand why she did not declare the interest in this company on her Register of Interests until 15th June 2020, over two years after she should have done so, and only on the third version. Cllr Priestley points out that she had been so extremely busy around the time of her election and for some time afterwards “*anyone under that sort of pressure with kids parental care duties etc. would forget*”.

31. So far as the other company named on her Register of Interests, Bethesda Social Enterprise Limited is concerned, Cllr Priestley told me that she owned the company and she is a director of it.
32. She said, “*I wanted to create a social enterprise, to do some sort of trade and plough money back in for social purposes..... Bethesda was in existence in 2018 when I was elected. To me it was a charitable purpose thing, it was all about leadership, supporting women and ethnic minorities. Over that year I began to think through the advice and coaching I had got. I wanted the company to be a business focussed on the social aim. In 2018 I wasn't intending to get any profit out of the company but as the year progressed I began to think about it and I wanted it to be a business as I thought it would then enable me to devote more time to it if I could get it to generate an income for me. It developed between 2018 and 2020. With the benefit of hindsight, I accept that I should have registered my interest earlier, but I got carried away with other things I was doing*”.
33. A search of the Companies House Register discloses that the company was incorporated on 7th August 2017, with Cllr Priestley named as the only Director and sole shareholder. Between then and 13th August 2020 a number of registrations were made at Companies House, all normal as required for small companies. There was a notice on 9th July 2019 for a Compulsory Strike Off which was discontinued on 20th August 2019. A c over the company's assets was made to a private equity company on 15th December 2017 which was discharged on 10th January 2018. Dormant accounts for the company were registered on 19th August 2019 and on the same date the registered office was changed.
34. Whilst the company does not appear to have done any significant business at all since its formation, it has been kept in existence since then and Cllr Priestley has been a director ever since. By her own admission, she intended to make a “profit or gain” out of the company; although she says: “*Bethesda was in existence in 2018 when I was elected. For me, it was for charitable purposes, hence my acknowledging Bethesda as part of my charitable work on the declaration form. it was all about leadership,*

supporting women and ethnic minorities. Over that year, I began to think through the advice and coaching I had got, I wanted the company to be a business focused on a social aim.

35. *In 2018 I wasn't intending to get any profit out of the company but as the year progressed I began to think about it and I wanted it to be a business as I thought it would then enable me to devote more time to it, if I could get it to generate an income for me. This social purpose was established in 2018 but the company aspect was not decided or developed until early autumn 2019*
36. *With the benefit of hindsight, I accept that I should have registered my interest in Bethesda under section one around 2019 when that company-based aspect of the vision started, but I got carried away with other things I was doing."*
37. However, the first mention of this company in section One of her Register of Interests was on 8th July 2020, and on the fourth version of her Register of Interests, despite the fact that throughout her time since she was re-elected as a member of the Council, she has been the sole director.
38. Cllr Priestley said that the entry which names Bethesda Social Enterprise Sparkles Charity in section Ten of her register is the same organisation as the Bethesda Social Enterprise Limited; and points out that this was listed as a charity interest in May 2018.
39. I have also been asked by the Assessment Subcommittee to consider the question of whether the operation of an incorrectly disclosed business led to a breach of the Code but whilst I have considered this as instructed, I have no evidence which is sufficient to substantiate any such breach and in any event, the first question would be whether or not the Code applied; for it to do so Cllr Priestley would have to be acting in her role as a councillor.
40. There is no evidence at all which I have seen to support such a finding in relation to Bethesda Social Enterprise Limited. So far as Fenixrising Limited is concerned, the evidence I have seen relates to a dispute over the terms of a legal agreement with a company owned by the complainant which I understand is the subject of a county court claim; and which claim is disputed by Cllr Priestley.

It would be wrong, in my view, to equate a legal dispute which is going to court with evidence of behaviour which was a breach of the code, particularly before the case has been decided, so the question may be premature; or simply not arise; and of course there is the issue of whether the Code applied in any event.

Accordingly, I do not think I am in a position to make any finding in relation to this issue.

The second allegation.

“Did the subject member breach the Code of Conduct by allowing a family member to contact the complainant?”

41. This relates to an allegation by Dr Chinwe Osuchukwu that on 20 May 2020 she was contacted via the telephone by Cllr Priestley’s mother. Dr Osuchukwu says that she found this intimidating and claims that the only way in which Cllr Priestley’s mother would have obtained her details would be that she gave them to Cllr Priestley; and that this was done in accordance with Cllr Priestley’s role as a member. This was the day when the Council was expected to elect Cllr Priestley as the Deputy Mayor; who would normally go on to become the Mayor the following year, but the election did not go ahead due to the complaints.
42. I have not interviewed Cllr Priestley’s mother, but I have interviewed Cllr Priestley and Dr Osuchukwu. Both their statements attached to this report contain details of how the complainant and Cllr Priestley claim that they met. Whilst there are some differences, there are also significant similarities.
43. Cllr Priestley says that the circumstances in which she obtained Dr Osuchukwu’s number was not in connection with her role as a member, Dr Osuchukwu maintains that it was. Cllr Priestley said that she had first met Dr Osuchukwu through a mutual acquaintance and then met her again when she presented her with an award.
44. She said *“I presented her with an award at the Women In leadership Awards in 2018, which I was asked by a Senior Officer to present in my role as portfolio holder. Chinwe had done a lot for the Milton Keynes community both in hospital and as part of a homeless charity. I subsequently invited her and about 18 others to join a working group to support me to make some decisions about a fund the Council wanted to set up to support communities across the city –the MK2050 Fund. I did this in my capacity as a cabinet member.”*
45. Dr Osuchukwu told me *“In 2018, I was awarded the Woman Leaders Award for an Outstanding Contribution to Milton Keynes. Cllr Priestley presented me with the award, which was sponsored by the council. That was the first time I met her. At the awards ceremony, Cllr Priestley asked for my number and another attendee at the awards, who came with me, gave it to her. I gave Cllr Priestley my mobile number for use in the*

Council business she asked me to be involved with”.

46. Dr Osuchukwu provided me with a series of emails which she had received from Cllr Priestley and from her PA, inviting her and others to participate in the setting up of governance arrangements around the 2050 fund. She told me that she and another mutual acquaintance had been invited to meet Cllr Priestley in a restaurant, but that this was changed to a meeting at Cllr Priestley’s home.
47. Cllr Priestley says that on the first occasion that she invited Dr Osuchukwu to her home she met and conversed with her mother and other family members over a Chinese meal that they shared but she said *“I called my mom and said I would love you to meet this lady. My husband and kids were also around. At that point it was my sister, her children, my children, my husband and my mom. We had drinks, joked and laughed around. Chinwe formally met my mom. We all sat in the living room watching something on television and had some cocktails...we were there a long time. We discussed a range of things in terms of my plans for the city and how to develop the different communities across the city...my mother was there throughout”.*
48. Dr Osuchukwu said *“As I was walking in, a lady was walking out. We weren’t introduced. When I sat down Cllr Priestley told me that the lady who was leaving was her mother. We started talking about where her family was from. Her father came from the same State as me, but I wouldn’t know him - there is no connection at all. I never met Cllr Priestley’s husband or children. I have never met her mother until that date and do not attend same Church as Councillor Priestley or her mother.”*
49. She said that Cllr Priestly *“talked for 40 minutes about the 2050 fund and the wider use of fund committee and commented that she wanted me to be part of the committee. She asked me formally if I had time to sit on that committee”*

The call on 20 May 2020

50. Dr Osuchukwu said about the call on 20 May *“it was that day that everything came out in the open. That day at around 4-6pm, Cllr Priestley’s mother called me. I have never been introduced to her mother and if I saw her, I wouldn’t recognise her. I received 4 or 5 missed calls on my mobile phone and ‘Mary Elder’ was the name coming up as the person calling me with “Smart” to it. I didn’t know who that was.*

That was the first time someone who is not on my contact list dialled with such frequency on my handset. Because the number was not familiar, I didn't answer the call, I first texted the person to say you called me call me back then saw there was a voice mail. I listened to the voicemail message that was left, and the caller said: 'I am [REDACTED], Moriah's mother'.

I called the number and asked her how she had got my number and she said Cllr Priestley had given it to her. She asked me to drop the complaint as Moriah was due to be sworn in that day. She said we are both from Nigeria and I should treat her as a sister."

51. *Cllr Priestley said on 20 May when she knew that her election as Deputy Mayor was not going to take place that evening due to the complaints received; "I talked to my mother about the situation, I was upset. My mother said: 'that's a shame, we've known this lady for a while, shall I call her?' I said: 'yes, that's fine'. My mother thought she could use the relationship she had built with Chinwe when she came around for dinner and met her and my family and as an older and respected person to open up the "friendly consultation" referred to by the contract. I was acting within the framework of the contract I had with Chinwe and not as a Councillor. My mother asked for her telephone number and I gave it to her.*
52. *My mother told me she did have a chat and all I asked her was what had happened. I wasn't there and I don't know what they said. From my point of view, this was not about anyone saying anything to political members or the press. To me it was a business issue I needed to get resolved. I decided to enact the two clauses we had in the Business Contract. It wasn't about that she had gone to whoever to report whatever. I didn't want to go to Court. I wanted to avoid the cost and the stress of going to court my life was already full with other pressures.*
53. *My mother said Chinwe was ranting, shouting at her, told her she didn't want to speak with her and said she wanted to drop the phone. As an African family we are big on honour and my mother was very hurt. She tried several times to get hold of her. I think because Chinwe didn't know who it was, she sent a text. I think she spoke to my mother when she said it was her. She only spoke to her once and my mother never called back because Chinwe was so rude."*
54. *The business contract referred to is the agreement for a joint venture between companies owned by Cllr Priestley and Dr Osuchukwu, referred to in para 25 above and included in the Appendix. It was a private arrangement outside the Council, and*

contained a clause whereby disagreements were intended to be initially dealt with through “friendly consultation”

55. Dr Osuchukwu claimed that she felt intimidated by the approach from Cllr Priestley’s mother and Cllr Priestley said *“I do not think this was intimidation and I never had any intent of intimidation. I completely refute such allegations”*.

56. She told me *“My mother is a 73-year-old woman, who is unwell, is blind in one eye, has cataracts in another and has no influence in terms of consequences.*

I did not try to intimidate or stop Chinwe. I really think this is an attempt to intimidate me to make me seem like I am some sort of person who tries to use my position to get things out of people. That is not me at all. That is most hurtful. All my life, I have fought for people less privileged. This is aggression and is completely against my values. This is what makes me angry. To have it from someone I thought was a friend and to attack my values is unspeakable.”

Code of Conduct

57. Under the provisions of the Localism Act 2011, all elected members must comply with their councils Code of Conduct when they are acting in their role as a member. A copy of the councils Code of Conduct is included in the Appendix

58. The particular requirements of the Code of Conduct which are relevant here are

- (i) the requirement for members to disclose on their Register of Interests matters which are required as set out in the Code as required by the provisions of the Disclosable Pecuniary Interests Regulations 2012. This includes a disclosure of:

any employment, office, trade, profession or vocation which is carried out by a councillor or their spouse/civil partner for profit or gain. These interests must be disclosed within 28 days of election, re-election or when a member becomes aware of any change; and

- (ii) so far as the question of the phone call is concerned to:

respect the confidentiality of information received by them as a councillor not disclosing any information to third parties unless:

Required by law to do so;

Where there is a clear and overriding public interest in doing so and the disclosure is made in good faith and in compliance with the reasonable requirements of the Council.

59. In respect of the Register of Interests, the evidence I have seen and indeed the admissions of Cllr Priestley with regard to both Fenixrising Limited and the Bethesda Social Enterprise Limited means that her interest in both companies should have been disclosed well before the time when they were. Cllr Priestley should certainly have declared Fenixrising Ltd in the 28-day period after her election in 2018 as she was holding an interest in the company then and was doing so for the purposes of profit or gain.
60. Even if Cllr Priestley genuinely overlooked making such declarations in the excitement of being re-elected and very shortly afterwards becoming a portfolio holder, there is sufficient evidence of activity and involvement of Cllr Priestley with the company between May 2018 and July 2020 to make me feel that it is highly questionable how Cllr Priestley did not realise that she had overlooked the need for recording it on her Register of Interests and seek to amend the record.
61. So far as the Bethesda Social Enterprise Limited is concerned, even if Cllr Priestley did not intend until later in 2019 to use that company for “profit or gain” she should have declared it as an entry in Section One then. Furthermore, given the importance of transparency, even where the company was inactive, it is in my view good practice for members to declare all occasions where they hold company director roles, as otherwise it is very easy for confusion and avoidance.
62. Both the entries at Companies House in relation to both companies and indeed the active joint venture arrangements with Dr Osuchukwu in November 2019 and her own decisions with regard to Bethesda Social Enterprise Limited in 2019 show that Cllr Priestley was aware of her role and relationship with these companies and she should therefore, under the Code have declared these on her Register of Interests. as soon as she became aware of it.
63. So far as the second allegation is concerned, it is clear that Cllr Priestley gave her mother, on her own admission, Dr Osuchukwu’s telephone number. However, this would only be an offence under the Code of Conduct if she was disclosing confidential information that she had obtained in her role as a councillor. The code does not apply to the actions of Cllr Priestley’s mother.
64. Given the dealings between the two parties which went beyond the initial involvement with the 2050 Fund and was not concerned with council business, particularly the joint venture arrangements referred to above, I do not think that I can be certain, on the

balance of probabilities, that the telephone number was only obtained in connection with Cllr Priestley's councillor duties.

65. Furthermore, this was personal contact information rather than confidential information and I have no evidence that when the number was given to Cllr Priestley, she was told that it was confidential and could only be used for council purposes. There has also been not inconsiderable contact between the two parties in relation to their company activities which are not connected to the Council and which would almost certainly involved contact details being passed between them. In the circumstances outlined, and on the balance of probability, my view is that there is insufficient evidence to substantiate a finding of a breach of the Code.

66. In making this finding, I have borne in mind evidence I have received from Dr Osuchukwu about the arrangements for the meeting at Cllr Priestley's house which appear to have been arranged by Cllr Priestley and by her PA, and clearly were done in connection with Cllr Priestley's council business.

67. I have also borne in mind the very clear anger and outrage expressed by Dr Osuchukwu which comes over very strongly and relates not only to the current dispute between them but also relates to matters which happened some time back. In support of her allegation Dr Osuchukwu has sent me many dozens of emails, screen shots and text messages; whilst I have considered all of these, the majority relate to matters I have been clear with her are outside the scope of my investigation.

68. **Findings**

69. For the Code to apply, it has to be found that the Councillor is acting on Council business. The allegations in respect of the Code of Conduct only applies when a councillor is acting as a member. The allegations in relation to the Register of Interests are clearly those which are done in relation to the role as a member, and therefore I find that there is clear evidence that the Code of Conduct applies to that allegation.

70. The evidence in relation to this is it seems to me clear that Cllr Priestley had the interests in these companies which she should have declared, and I do not find it credible that these were overlooked between her election and when she declared them two years later; and furthermore only at the third and fourth time of completing the Register of Interests. She told me that the companies have nothing to do with council business, and that may very well be the case, but that is irrelevant for the purposes of completing the Register.

71. On the balance of probabilities, it therefore seems to me that there is sufficient evidence to make a finding that she did breach the Code of Conduct by not making declarations on her Register of Interests about her roles with Fenixrising Limited and the Bethezda Social Enterprise Limited.
72. I make no finding in relation to the question of whether the operation of an incorrectly disclosed business led to a breach of the Code
73. In relation to the allegation about the disclose of the telephone number, I cannot be satisfied that this telephone number was obtained purely in accordance with Cllr Priestley's role, nor that it was confidential information relating to the Council and therefore do not feel there is sufficient evidence, using the balance of probabilities test, to make a finding of a breach of the Code of Conduct in relation to this allegation.

Olwen Brown

Partner,

Anthony Collins Solicitors.