# Appendix A

# Complaints by JL, OM, Tricia Okoruwa, HR and GB of the Education Department of the Children and Young People Directorate against Councillor Brian Bell.

Report of an Investigation by Graham White, Interim Assistant Director (Legal and Democratic Services) appointed by Gifty Edila, Corporate Director of Legal, HR and Regulatory Services and Monitoring Officer.

## Investigation into complaints against Cllr Brian Bell

#### Report of the Investigation

#### 1. The Complaints

- 1.1. On 10 May 2013 four complaints were made about the conduct of Cllr Brian Bell in relation to the process for the appointment of a Head Teacher at Parkwood Primary School. These complaints were made by officers from the Education Department of the Children and Young People Directorate, as follows:-
  - (i) JL
  - (ii) OM
  - (iii) Tricia Okoruwa
  - (iv) HR
- 1.2. On 13 May 2013 a further complaint was made by another officer who had been involved in these matters, GB.
- 1.3. Cllr Bell was appointed by the Council as a local authority governor at Parkwood School and at all relevant times was Chair of the Governors and Chair of the Governors' Recruitment Panel for the post of Head Teacher. Parkwood Primary School does not have its own Code of Conduct for Governors.
- 1.4. The Council's Code of Conduct for Members and voting co-optees provides at Paragraph 2.5
  - 2.5 Where you act as a representative of your authority-

(a) on another relevant authority, you must, when acting for that other authority, comply with that authority's code of conduct, or

(b) on any other body, you must, when acting for that other body, comply with your authority's code of conduct, except and insofar as it may conflict with any other lawful obligations to which that other body may be subject.

1.5. In the absence of a school Code of Conduct for Governors, the Council's Code of Conduct will apply to Governors who are appointed by the local authority.

#### 2. Assessment of the Complaints

2.1. The Standards Assessment Sub-Committee met on 6 June 2013 to consider the complaints. The Monitoring Officer's report to the Sub-Committee is Appendix 1. Appendix 2(i)-(v) comprises the complaints.

- 2.2. The Council's Code of Conduct is Appendix 3 and the observations of the Independent Person are Appendix 4.
- 2.3. The Sub-Committee considered that there was a potential breach of the Code of Conduct but that it was not in the public interest to proceed to investigation providing Cllr Bell is willing to apologise to the complainants for his conduct. The Sub-Committee resolved that:

(i) The Monitoring Officer shall write to Cllr Bell, on behalf of the Standards Assessment Sub-Committee, requesting that he apologises in writing to the complainants for his conduct.

(ii) If Cllr Bell refuses to provide a written apology to the complainants then the complaint will be automatically referred to the Monitoring Officer for investigation.

The Minutes of the meeting are Appendix 5.

- 2.4. Formal decision notices which state the Sub-Committee's decision in relation to each complaint was prepared and sent to each complainant. These are Appendix 6(i)-(v).
- 2.5. The Monitoring Officer wrote to Cllr Bell on 17 June 2013 attaching the decision notices (Appendix 7). She also stated that the Assessment Sub-Committee had proposed that Cllr Bell should offer a written apology to the officer. If he did not wish to do so, the Monitoring Officer would need to arrange for the complaints to be investigated by her deputy. No reply was received.
- 2.6. On 16 July 2013 the Monitoring Officer wrote again to Cllr Bell seeking a response to her letter of 17 June 2013 (Appendix 8) but again received no reply. In consequence, the Monitoring Officer appointed Graham White, Interim Assistant Director, Legal and Democratic Services as the Investigating Officer to conduct an investigation and report upon it.
- 2.7. On 29 July 2013 the Investigating Officer wrote to Cllr Bell asking whether or not Cllr Bell intended to apologise to the complainants, failing which a formal investigation would be undertaken. This email is Appendix 9. No reply was received.
- 2.8. On 22 August 2013, the Investigating Officer wrote again to Cllr Bell, asking him to confirm his situation by the end of August and if either there had been no confirmation of written apologies or no communication at all then the formal investigation would commence. This email is Appendix 10. No reply was received.

# 3. Councillor Brian Bell's official details

3.1. Cllr Brian Bell:

- i) Was first elected to the Council on 4 May 2006;
- ii) Was re-elected on 6 May 2010;
- iii) Signed the declaration of acceptance of Office, undertaking to observe the Members' Code of Conduct, on 7 May 2010;
- iv) There is no record of Cllr Bell having attended training in respect of the Code of Conduct since his re-election in 2010;
- v) Cllr Bell is currently a Member of the following Committees Council Appointment Committee, Brownswood Ward Forum, Licensing Committee, Licensing Sub-Committee C, Pensions Sub-Committee, Planning Sub-Committee, Regulatory Committee;
- vi) Cllr Bell is also a Member of the following external bodies (outside bodies) – Finsbury Park Trust, Hornsey Parochial Charity, London Road Safety Council, and Parkwood Primary School Governing Body;
- vii) Was appointed to the Governing Body of Parkwood Primary School for a four year term of office by Cabinet on 28 January 2008. The appointment took effect on 24 February 2008;
- viii) Was re-appointed by Cabinet on 26 March 2012 with effect from 24 February 2012.
- 3.2. Cllr Bell completed a Members' Interest form on 26 July 2012, which was entered into the Register of Members' Pecuniary and Other Interests. This is Appendix 11.
- 3.3. Under Part B Members' Other Non-Pecuniary Interests, in respect of (i) Any body or organisation of which you are a member or in a position of general control or management and to which you are appointed or nominated by this Authority.; Cllr Bell declared four organisations, one of which states 'Governing Body Parkwood Primary School'.

#### 4. Participation in the Investigation

- 4.1. On 8 October 2013 the Investigating Officer wrote to Cllr Bell referring to the previous emails (Appendices 9 and 10), advising him that a formal investigation had commenced and inviting him to a meeting with the Investigating Officer to put his response to the complaints. This email is Appendix 12.
- 4.2. The Investigating Officer stated that if Cllr Bell did not wish to meet him, the Investigating Officer would proceed to write his report on the

basis of the information available to him and would have to state that ClIr Bell had not co-operated with the Investigation. The Investigating Officer requested a reply by the close of business on Friday 18 October. If no reply was received by that time, the Investigating Officer would conclude that ClIr Bell did not wish to meet him.

4.3. No reply to that email has been received and it must be concluded that Cllr Bell has declined to co-operate with the Investigation.

# 5. Complaint by JL

- 5.1. In addition to her written complaint, Appendix 2(i), Ms L has made a statement which is attached at Appendix 13.
- 5.2. Ms L attended the Recruitment Panel's shortlisting meeting and considered that her and her colleague were not made welcome by Cllr Bell who chaired the meeting and that they found it difficult to make contributions as Cllr Bell ignored them and talked over Ms L thereby blocking her from speaking. She felt that Cllr Bell's behaviour towards herself and her colleague was disrespectful.
- 5.3. On the day of the interviews, a member of Ms L's team was the administrative officer responsible for the smooth running of the process. When she returned to the office, this officer reported to her manager, Ms L, an incident in which Cllr Bell had spoken to her in an intimidating manner. Ms L was concerned that Cllr Bell had spoken to a relatively junior member of staff in this way and she reported the matter to Tricia Okoruwa, the Head of the Education Service. Ms L considered that Cllr Bell's behaviour towards the member of her team to amount to bullying.

#### 6. Complaint by OM

- 6.1. In addition to her written complaint, Appendix 2(ii), Ms M has made a statement which is attached at Appendix 14.
- 6.2. In the recruitment process, it was necessary for Ms M to liaise with Cllr Bell and she found this challenging as he did not readily reply to emails and appeared unwilling to take on board advice offered to him. He did not wish to use the department's standard shortlisting grid, preferring to bring his own to the meeting.
- 6.3. Between the shortlisting and the interview Cllr Bell instructed Ms M not to send a letter of invitation to a candidate as he would deal with it himself, which was irregular.
- 6.4. An issue arose over the class which would be taught by candidates as a selection exercise and when a candidate wrote to Ms M about this it was evident that Cllr Bell had written to that candidate and had telephoned the candidate too.

- 6.5. Two days before the interviews a candidate rang Ms M to express concern at being written to direct by ClIr Bell, and asked if Ms M knew why. She did not. On the day before the interview the candidate rang to withdraw her application. She had received an email from ClIr Bell in the early hours of the morning and she considered that if the Chair of Governors was acting like this before the interviews she did not wish to work with/for him.
- 6.6. On the day of the interview Ms M met Cllr Bell upon his arrival at the school and took him to the room where the Panel was assembled. In the corridor he looked at Ms M intensely and said 'You are the one who sent those emails to candidates even though I said don't send them'. He did not raise his voice though his hands and body were shaking. Ms M found the look in his eyes scary. She was surprised by this incident and felt intimidated.
- 6.7. On her return to the office Ms M reported the incident to her manager, Ms L.

## 7. Complaint by Tricia Okorowa

- 7.1. In addition to her written complaint, Appendix 2(iii), Ms Okoruwa has made a statement which is attached at Appendix 15.
- 7.2. As Education Director, Ms Okoruwa had an overview of the recruitment process for the Head Teacher of Parkwood Primary School.
- 7.3. She had email correspondence with Cllr Bell when she had followed up on issues where Cllr Bell had been difficult with other officers about the process. He did not respond regularly to emails and it was necessary to write to him several times before eliciting a reply. Ms Okoruwa found some of the intermittent replies to be quite intimidating in their style and tone e.g. the use of capital letters.
- 7.4. Ms Okoruwa considered that Cllr Bell misunderstood the different roles of a local authority governor from that of the local authority's statutory role and whilst Ms Okoruwa was seeking only to fulfil the latter responsibilities Cllr Bell in the former role was seeking to encroach upon the Authority's statutory powers and duties.
- 7.5. During the course of the unsatisfactory correspondence Cllr Bell had indicated that he had his own ideas upon shortlisting but he never advised Ms Okoruwa what those ideas were or what he wanted to do and eventually Ms Okoruwa instructed her staff to prepare what is normally prepared for a Head Teacher appointment.
- 7.6. Ms Okoruwa instructed a Senior HR Officer to accompany the Education Officer to the shortlisting meeting which would not normally

have been necessary but was so considered in order to ensure the process was robust and appropriate.

- 7.7. After the shortlisting had taken place, one of the candidate's references did not meet Education policy requirements and Ms L was required to ask Cllr Bell to seek a reference from the candidate's previous Head Teacher. A number of emails were not replied to and altogether this took about 6 weeks to progress to the point of obtaining something which was not altogether satisfactory.
- 7.8. Correspondence took place with Cllr Bell as to the date for the interviews. Ms Okurowa advised she could manage any day of the chosen week except Wednesday, which was the day Cllr Bell chose.
- 7.9. After the interviews Ms L reported to Ms Okorowa the incident when Cllr Bell had spoken to Ms M in the corridor. Ms Okoruwa was most concerned about this as it appeared that Cllr Bell's conduct towards one of her junior members of staff was intimidatory and unnecessarily aggressive.
- 7.10. After the interviews it was necessary for the full governing body to ratify the decision and a meeting was arranged for 2 days later. On the day before the Governor's meeting, GB who had attended the interviews advised Ms Okoruwa of certain concerns about the successful candidate and Ms Okurowa wrote to ClIr Bell setting out those concerns and stating that she would make herself available to advise the Governors at their meeting. She told ClIr Bell she intended to send a letter to all Governors before the meeting, advising them of her availability. No reply was received from ClIr Bell and eventually Ms Okoruwa sent the letter anyway at lunchtime on the day of the meeting.
- 7.11. Ms Okoruwa and Ms B went to the Governors meeting and stood outside the room waiting to be invited in. After 20 minutes or so Cllr Bell came out and told them that the Governors had made their decision and that they were not needed. Ms Okoruwa asked if Cllr Bell was refusing them the opportunity to address the governing body and he replied that he certainly was. He then started to walk off and Ms Okoruwa said that when the process was concluded we need to discuss the behaviours of a local authority governor. Cllr Bell went back into the room and slammed the door.
- 7.12. Following the Governors' decision it was left to Ms Okoruwa's department to make the formal offer of employment subject to the usual checks and all this took 6-8 weeks during which the Head of Education HR was in correspondence with Cllr Bell over whether the references provided met Education policy requirements. Ultimately an additional referee was sought in order to cover essential criteria not covered by the other references.

7.13. Ms Okoruwa considered that throughout the process, Cllr Bell had been disrespectful to her and her staff and had been obstructive and unprofessional throughout. She described Cllr Bell's behaviour as aggressive and non-communicative and that he showed an unwillingness to consider the advice offered by the local authority in its statutory role.

# 8. Complaint by HR

- 8.1. In addition to her written complaint, Appendix 2(iv), Ms R has made a statement which is attached at Appendix 16.
- 8.2. Ms R was asked by Ms Okoruwa to attend the Panel Shortlisting Meeting at Parkwood Primary School in place of Ms B who had another appointment. She took with her the pre-prepared shortlisting grids. She had not met Cllr Bell previously.
- 8.3. JL offered the grids to the meeting but Cllr Bell was very clear that he did not wish to use the local authority standard procedure and emphasised that it was the Governors' appointment and that they could follow whatever procedure they considered appropriate. Whilst Cllr Bell was firm in his opinion, there was no aggression in his words or posture and Ms R did not feel threatened.
- 8.4. Cllr Bell brought out his own scoresheet but did not have enough copies to circulate and so Ms B offered the ones prepared earlier by Education. Whilst the atmosphere in the meeting was polite, Ms R felt an underlying tension.
- 8.5. Having made their selections for interview, Ms R advised the Panel upon a range of activities which had been used in the past and had proved very successful in headship interviews and a discussion took place about which activities to employ. Ms R had concerns that one of the candidates had worked previously at Parkwood and would know the pupils which could be advantageous. Cllr Bell thought this was not a problem but the other Governors accepted the advice and looked to have the activities carried out elsewhere.
- 8.6. The Governors agreed upon the School where this would occur and Ms R agreed to make the necessary arrangements. Cllr Bell wanted the whole panel to observe the teaching exercise. Ms R advised that this was not appropriate. The matter was not resolved at the time and in subsequent email correspondence Cllr Bell told Ms R he was not prepared to have any discussion upon the matter. Ms R told Cllr Bell that the Head of the selected School was not prepared to have the entire panel in the classroom for health and safety reasons. The matter was still not resolved but Cllr Bell would not correspond with Ms R so it was hard to organise anything.

- 8.7. After the shortlisting meeting had finished SG, a Support Staff Governor and a teaching assistant at the School asked to speak to Ms L and Ms R. She was concerned about what had happened on the Governing body but was fearful of raising her concerns as she was employed at the school.
- 8.8. After the interviews had taken place Ms G emailed Ms R to say she was considering resigning from her role as a governor as a result of events which has occurred. Cllr Bell had told the Panel to reject all advice from HR and not to follow HR instructions. Ms G had expressed her opinion that unless the panel appointed correctly the panel would be liable to prosecution and she felt the panel must listen to and follow HR advice. From that point Cllr Bell left her out of all roles even though she had been allocated to certain roles by Ms B. She considered Cllr Bell to have been rude and aggressive in his manner throughout the process to anyone whether HR or Panel member if they did not agree with him.
- 8.9. Ms R states that the reason she has complained is because she is very concerned that someone should be fearful of retaining their post due to standing up to the Chair of Governors.
- 8.10. Ms R considered that Cllr Bell's conduct contravened the Standards of Public Life and in particular Principle 2 (honesty and integrity), Principle 3 (objectivity), Principle 7 (respect for others) and Principle 10 (leadership).

# 9. Complaint by GB

- 9.1. In addition to her written complaint, Appendix 2(v), Ms B has made a statement which is attached at Appendix 17.
- 9.2. When the post of Head Teacher at Parkwood Primary School was advertised initially, Ms B was the Education Adviser to the Recruitment Panel. She attended the Panel's shortlisting meeting and was surprised to find that there were 6 members. She explained that normally a recruitment panel would comprise an odd number of members thereby facilitating a majority. Cllr Bell responded sharply that it was a matter for the Governors to decide how many should be on the Panel.
- 9.3. While waiting in the school hall for her taxi following the meeting, Cllr Bell approached Ms B and said in a manner she considered to be aggressive that it was for the Governors to fix the size of the Panel and had nothing to do with her. She responded that her role was to advise the Panel.
- 9.4. The post was re-advertised and Ms B was not present at the Panel's shortlisting meeting due to another appointment but was earmarked for the interviews. Leading up to the interviews there was email

correspondence with ClIr Bell regarding the tasks which would comprise the process. Some of this was conducted by Ms B and some by her various colleagues. Ms B considered the tone of ClIr Bell's emails to be unhelpful, rude and insistent upon practices which were not feasible. One issue regarding ClIr Bell's wish to have the whole panel observing the teaching exercise was only resolved when the host Head Teacher said she was not able to accommodate the whole panel in the classroom at once.

- 9.5. The second applicant invited for interview withdrew before the interview. She told Ms B that the tone of emails to her from Cllr Bell had influenced her decision to withdraw.
- 9.6. Ms B perception was that Cllr Bell wanted to control the entire process throughout and not to maintain an overview and as a consequence was getting too involved in minutiae. In consequence one candidate withdrew and the process did not proceed as smoothly as it should have.
- 9.7. At the teaching exercise Ms B was the only professional present who could judge the quality of the teaching. She advised the Panel that the lesson required improvement and that the teaching was not strong enough.
- 9.8. At the interview Ms B was the only officer present. It had been difficult to set questions upon competencies set by Cllr Bell as they were too extensive. Cllr Bell had not wanted to use/adapt standard questions.
- 9.9. The Panel did their scoring and felt the candidate has done well enough to be appointed. Ms B told them she could not support the appointment because the quality of the teaching was not a sufficiently high standard; the responses to questions did not display sufficient understanding of leadership and were too limited; and the references did not support the candidate's suitability for headship.
- 9.10. Cllr Bell advised that Ms B comments were noted but the Panel did not agree and were going to recommend appointment to the governing body.
- 9.11. On returning to the office Ms B discussed events with Tricia Okoruwa who put her concerns initially to Cllr Bell and when he failed to respond, to all the Governors.
- 9.12. Although not invited, Ms Okoruwa and Ms B attended the Governors' meeting to advise but they were not invited in and Cllr Bell came out and told them they were not needed.
- 9.13. At the conclusion of the matter Ms B felt aggrieved at the level of disrespect she considered she had experienced from Cllr Bell. From her knowledge of the series of events throughout the process she

considered that Cllr Bell had been discourteous to everyone from the Education department with whom he had come into contact.

## 10. Consideration of breach of the Code of Conduct

- 10.1. With one exception, the complaints do not identify specific breaches of the code of conduct rather that the conduct complained about was regarded by them in general terms as being such as to breach the Code. The complaints can be attributed to particular obligations under the Code of Conduct.
- 10.2. Ms L considered Cllr Bell's behaviour to be disrespectful and with regard to the incident with Ms M bullying. In the General Obligations of the Code of Conduct Paragraph 3.1 states:

*3.1* You must treat others with respect and Paragraph 3.2:

- 3.2 You must not
  - (b) bully any person;
- 10.3. Ms M found dealing with Cllr Bell challenging though did not allege that his conduct was disrespectful towards her until the incident in the corridor occurred. She was surprised and intimidated by this and it may be inferred that the complaint about this incident also related to Paragraphs 3.1 and 3.2 of the Code.
- 10.4. Ms Okoruwa's complaint was wider than the others, as might be expected from a Director with an overview of the entire process and in general she considered ClIr Bell to have been unwilling to consider advice from the local authority which was manifest in a disrespectful attitude to her and her staff demonstrated through obstructive, aggressive and intimidatory behaviour both to herself and to her junior staff. When the complaint is considered alongside the Code of Conduct it is compliance with Paragraphs 3.1 and 3.2 which fall to be determined.
- 10.5. Ms B considered that Cllr Bell wished to control the entire process himself and as he did not appreciate the input from the Education department he was unhelpful, rude and aggressive in correspondence and discourteous to all from the Education department which amounted to disrespect and thus Paragraph 3.1 of the Code.
- 10.6. Ms R referred to the General Principles of Public Life upon which the Code of Conduct is based. She referred to the previous version of the Principles and not all the matters referred to are contained in the latest version. These were:

Principle 2 Honesty and integrity (Now Principles 2 and 6)
Principle 3 Objectivity (Principle 3)
Principle 7 Respect for others (no longer in the General Principles)
Principle 10 Leadership (now Principle 7)

- 10.7. Having regard to the Principles of Public life referred to by Ms R, and former Principle 2, there have been no allegations which impugn Cllr Bell's honesty: there is no suggestion that he has been other than truthful. Similarly with regard to Integrity there is no suggestion that Cllr Bell has acted in order to gain financial or other material benefits for himself, his family or friends.
- 10.8. Principle 3 requires Members to act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias. No allegation has been made that Cllr Bell failed to adhere to this provision.
- 10.9. Principle 7, Respect for Others has been dropped from the general principles of public life, but remains in the general obligations of the Code of Conduct at Paragraph 3.1
- 10.10. Principle 10, Leadership, retained as Principle 7 of the new version, requires Members to exhibit the general Principles of Public Life in their own behaviour.
- 10.11. No aspect of the complaints against Cllr Bell is sufficient to suggest failure to observe the general principles.
- 10.12. Ms R stated that the reason for her complaint was her concern for a governor who was fearful of retaining their post at the school if she stood up to Cllr Bell as Chair of the Governors. This Governor is not a complainant and this aspect of the matter is not under consideration.
- 10.13. Whilst these five complaints relate to a variety of elements of the recruitment process, the recurring theme throughout is whether Cllr Bell treated these various members of staff with respect (Paragraph 3.1) and whether his behaviour amounted to bullying (Paragraph 3.2).
- 10.14. It is evident that as Chair of the Recruitment Panel and Chair of Governors, Cllr Bell wanted to shape the recruitment process to his own preferences. He did not welcome the input from the Education Department and did not accept it graciously.
- 10.15. The impression given from the complainants' evidence is that Cllr Bell is plain speaking with an assertive demeanour. Undoubtedly he dealt robustly with the officers on occasion. However, in his dealings did his conduct cross the line of being assertive in pursuing what he regarded as the best process to that of being disrespectful to the officers and bullying them?

- 10.16. In the treatment of Ms L and Ms R at the shortlisting meeting his assertiveness extended to ignoring and talking over these senior officers, in order to block their contributions in front of a panel of governors, which the officers regarded as demeaning and this showed a lack of respect for them.
- 10.17. The various correspondences between Ms Okoruwa and Cllr Bell were unsatisfactory due to the reluctance of Cllr Bell to respond promptly or fully, at times leaving Ms Okoruwa no choice but to act unilaterally. Taken together with the refusal to allow Ms Okoruwa to address the Governors' meeting I consider that Cllr Bell failed to show Ms Okoruwa the respect to which she was due as Education Director.
- 10.18. Ms B had experienced Cllr Bell's assertiveness at the first shortlisting meeting and had engaged in email correspondence in which Cllr Bell had been unwilling to accept professional advice upon education issues. At the interview Ms B was the only education professional present and offered professional advice upon the candidate's suitability for the post, which was noted but not accepted. One of the disregarded points was considered so important that Ms Okoruwa wrote to all the Governors expressing Ms B's concerns. Despite having attended for the purpose, Ms B was not allowed to express her concerns to the Governors' meeting.
- 10.19. Throughout the process Cllr Bell had been unwilling to accept advice upon education issues much of which had been tendered by Ms B. It was Ms B's role to advise and for the Panel to determine the appointment and there was no requirement upon the Governors to accept the professional advice of the officer come what may, but at the same time as the sole educational professional, Ms B's advice should have received serious consideration prior to any rejection. It is clear that on a number of occasions Ms B's advice was noted and rejected without more detailed consideration both by Cllr Bell alone and when chairing the Panel, and the advice and Ms B as the provider of it were entitled to greater respect than they were afforded.
- 10.20. Ms M had a challenging time in correspondence with Cllr Bell as he was not very receptive to advice from the Education department but that alone would not have prompted a formal complaint. The issue which was the subject of the complaint was the incident in the corridor when Cllr Bell spoke to Ms M in a manner which she found intimidatory.
- 10.21. The tone of voice and body language cannot be verified at this stage and the words used might have been no more than a comment. The words alone do not infer disrespect and there is no suggestion that the comment was made with a view to Ms M adopting any particular course of action. Consequently I do not consider that this incident

amounted to a breach of paragraph 3.1 nor to a breach of paragraph 3.2

## 11. Conclusion

- 11.1. I consider that Cllr Bell has failed to treat Ms L, Ms Okurowa, Ms R and Ms B with respect and has breached Paragraph 3.1 of the Code of Conduct.
- 11.2. I consider that Cllr Bell has not failed to show respect nor bullied Ms M and has not breached paragraph 3.1 and 3.2 of the Code of Conduct in respect of her complaint.
- 11.3. I consider that Cllr Bell has not breached paragraph 3.2 of the Code of Conduct in relation to the other complainants nor to Education staff generally.

Graham White Investigating Officer

Interim Assistant Director (Legal and Democratic Services)

November 2013