

IN THE MATTER OF THE LOCALISM ACT 2011 SS 27 & 28 AND OF EAST
STAFFORDSHIRE BOROUGH COUNCIL'S CODE OF CONDUCT FOR
COUNCILLORS AND ITS PLANNING CODE FOR COUNCILLORS

REPORT

1. I have been asked to report on allegations made against Councillor Hussain as set out in complaint no. 2018/23.
2. I issued a draft report on 17 October 2019 and received detailed submissions back from Edward Duthie Shamash acting on behalf of the Councillor dated 11 November 2019 and 16 December 2019. I have taken those submissions (“the Submissions”) into account in finalising this report. I have responded to what I consider to be the main points raised by the Submissions. The Submissions can be read side by side with the report. For clarity I have endeavoured to keep the structure of this report largely the same as the draft report, save for this introductory section and the use of footnotes to address some of the points made in the Submissions. The Submissions have not persuaded me that any of the key conclusions in my draft report should be altered.
3. In this report I have been asked to consider the complaints against the Code of Conduct, but also against whether the conduct of the councillor has demonstrated some other kind of unlawful conduct.
4. I have been appointed to investigate the complaints pursuant to section 5 of the Standards Committee Complaints Procedures. In accordance with that procedure I

have to decide whether or not there is evidence of a failure to comply with the Code in relation to each complaint.

5. I considered it was appropriate to interview the Councillor. That interview took place on 13 February 2019. During interview the Councillor confirmed to me that he had had an adequate opportunity to re-read the detailed complaint made against him. He accepted that he would have seen the rules relating to his appointed role at QSCC fairly shortly after his appointment, and that he understood them. I deal more fully with some of the responses the Councillor gave during interview below.
6. As a result of that interview I sought further information from both the complainant and [REDACTED], the manager of QSCC (and in fact the only full time employee). They both provided detailed written responses to my questions.
7. Where for the purposes of this report I have recorded findings of fact I have made those findings on the balance of probabilities.
8. In light of some of the submissions made on my draft Report it is important to record:
 - a. I am only conducting an investigation into the Complaint I have been asked to consider;
 - b. In doing so, I do not consider it is necessary or appropriate to conduct a comparative analysis of how other councillors who are not the subject of complaint have conducted themselves;
 - c. It follows from applying the balance of probabilities test, that I have not required certainty of any fact before relying on it. I have simply used a

proportionate level of evidence to inform my findings which have been made applying that test;

- d. It was a matter of judgment for me to decide whether on the information provided by the Councillor during interview, it was appropriate to interview others in order to be able to reach conclusions upon the complaint. I considered that the interviews I had conducted together with the written material supplied to me provided a proper evidence base for determining the complaint.¹
- e. I do not accept the unfortunate assertion that the draft report was “*artificially constructed*”. The delay in producing the report was substantially my own, but also in part due to the period of sensitivity before the local elections earlier in the year.
- f. The Submissions *assume* in various places that the evidence provided by was unreliable, or should be treated as such; but I did not conclude that it was. Similarly, I do not accept their account was affected by “*obvious partiality*”.
- g. Contrary to the implication in the Submissions, and as I recorded in my report, when there were important examples of facts which could not be reconciled with what the Councillor was telling me, I gave the Councillor the

¹ The Submissions do not set out in any significant detail how the evidence of other individuals I might have interviewed would have been persuasive in relation to the main issues for consideration I have identified within my report.

opportunity to put forward any reasons he wished to as to why other witnesses would not be telling the truth.²

Summary of Report

9. In my view the complaint made provides evidence of a breach of the Code of Conduct.³

Discussion

10. The complainant is [REDACTED], Chair of the Board of Trustees of Queen Street Neighbourhood Resource Centre (“QSNRC”) which operates from and under the name of the Queen Street Community Centre (“QSCC”), located at Queen Street, Burton upon Trent, DE14 3LW.
11. The gravamen of these complaint is the allegation that the Councillor acted inappropriately while he was one of the Council appointed members of the board of QSCC.
12. I have listed and dealt with what are, in my view, the more serious of the allegations contained within the complaint.

A. The Councillor was in dereliction of his duties as a Council appointed member of the board, attending only 4 of 16 possible meetings of the board over the period of 2017-2018.

² It is important that this opportunity was given to the Councillor during interview where any questions arising could have been followed up by me within the interview. I attach greater weight to what was said to me during interview on these points compared to information made available after the interview in relation to matters which could have been raised at that time.

³ The Submissions criticise this paragraph in a semantic and disective way, but it is simply a summary of my detailed findings in the report.

13. By paragraph 3.1 of the Code of Conduct for the Board of Directors for QSCC (“the Board’s Code) all directors agreed that they would attend all appropriate meetings or give apologies. By paragraph 3.2 they were obliged to prepare fully for all meetings and work for the organisation. That obligation extended to reading papers for the meeting, querying anything the director did not understand, thinking through issues before meetings and completing any tasks assigned to the director within a reasonable time. The contents of those paragraphs serves, to a reasonable reader, to emphasise the importance of attending board meetings and coming well prepared so that the aims and objectives of QSCC could be furthered by the board.

14. From the detailed records provided to me it appears, for example, that the Councillor did not attend a single board meeting between March 2017 to July 2017. It appears he attended two board meetings that year, in February and October.

15. Similarly, in 2018 the record I have runs until September 2018. The Councillor attended only two meetings, in May and September 2018. The board quorum for voting was five members. On four of the occasions the Councillor was not present, only four members of the board were present. Accordingly, on those four occasions, his non attendance was the difference between the board being able to conduct business and make decisions, and it not being able to.⁴

16. The Councillor was not able, in interview, to adequately account for this situation.⁵ I understand that he lives about 100 metres from the building in which board meetings

⁴ Contrary to the Submissions, this paragraph is accurate. It is simply that two of the four meetings which were not quorate were in 2017 (January and June) and two were in 2018. Nor is it misleading, in my view, to say that the Councillor’s absence was the difference between quoracy and non-quoracy. That is correct. The fact that other councillors might also have chosen to attend does not detract from that point.

⁵ The Submissions, in my judgment, miss the essence of the point here. It is not that the Councillor was absent for one or two meetings, so that it might be important to investigate further whether he was indisposed on a particular day, but rather that he could not adequately account for a sustained pattern of absence. He did not

were held. He sought to emphasise the amount of effort he had put into community events and the running of the centre outside of board meetings, but in my view that is no real substitute for the proper discharge of the functions appointed to him as one of a maximum of three Council appointed decision makers on the board. He told me that of those meetings he had attended, he may have left half of them early before they finished. He said he sent apologies on every occasion when he did not attend, but I have been given detailed records from [REDACTED], drawn from the contemporaneous material, that indicate that is unlikely to be right. In any event, one apology or a few over the years might be acceptable.⁶ Even on the Councillor's own case he was present for two full meetings and for parts of two meetings during his tenure up to September 2018.⁷

17. In light of his familiarity with the rules of QSCC, the Councillor would have understood the importance of at least one Council nominee being present for all board meetings.⁸ The articles of QSCC provide that they cannot make decisions without one nominee being present.

18. In my view this lack of engagement with QSCC, in the face of the Councillor's appointment to the board, is liable to bring the Council's reputation into disrepute.

during interview advance a case to me that his other obligations were necessarily keeping him from attending meetings; and I note that the Submissions do not seek to demonstrate by evidence that was in fact so.

⁶ The Submissions have chosen to focus on the sentence before this one, but as I have made clear I would not regard the Councillor's conduct in this respect as compliant with the Code even if he had given apologies for each meeting he had failed to attend.

⁷ I do not consider that the second sentence of para 3.1 of QSNRC's code was intended to apply to this situation. This was not simply a failure to attend "*regularly*", in my view it was significantly more serious than that.

⁸ The Submissions ask why further investigations were not made as to whether and if so what action was taken against the Councillor prior to the complaint against him. It is not clear what implication is sought to be drawn from this point, but if the implicit suggestion is that QSNRC ought to have taken further action at an earlier point in time, I do not see how that assists the Councillor in defending the complaint against him. In my view it was not for QSNRC to seek to cajole the Councillor to fulfil what he clearly understood were his responsibilities.

B. The Councillor failed to engage with the complaints process operated by QSCC related to , and conducted himself in such a way as to seek to divert a business opportunity from QSCC to USCC

19. is a training agency providing specialist training, recruitment and business development services. It is a Burton based start up. It was hoping to enter into arrangements with QSCC to deliver programmes to the local area. The complaint was made in writing by an email dated 8 August 2018. is assisted locally by the UK Training College (“UKTC”) which is an existing business operating in Derby and Sheffield.
20. The complaint centred upon the Councillor’s conduct in requiring to operate from the Uxbridge Street Community Centre (“USCC”), rather than from QSCC. That “*demand*” – the word used in the complaint – was made during an informal meeting between the Councillor and at the USCC. The complaint also alleges that the Councillor asked to keep their discussion confidential and not disclose it to QSCC. It is implicit in the complaint that the Councillor may have sought to dissuade members of the Muslim community from attending courses held elsewhere. The Councillor had, according to the complaint, told other members of the QSCC board that “*could not be trusted*”. It does not appear that any persuasive justification for that comment, which took as defamatory, was provided to the board.
21. Linked to that, from response to my further questions it appears that the Councillor also sought to disparage to QSCC’s board during a meeting in May 2018, with a view to QSCC rejecting as a licensee within the building. At that time there appears to have been interest in the space QSCC had available both from

and from an individual called . However, was not prepared to accept the rent proposed by , which he regarded as a reasonable rent. It appears that and an individual called were all directors of a Community Interest Company associated with USCC. The detail of this element of the allegation has not been put to the Councillor, as it only became fully apparent on response to me. However, in light of my findings elsewhere in this report the Council may wish to investigate this issue further at any future hearing.⁹

22. The allegation made in the complaint was clearly a serious one. QSCC sought to progress it. The essence of the allegation was not just made in the email, it had been made by in a discussion they had. ' recollection of the discussion is recorded in what I understand are contemporaneous notes of a meeting held on 19 July 2018. He said “/ *J had told / J that [the Councillor] had specifically been negative about QSNRC and said UKTC should not use [the QSCC] facilities. That [QSCC] would not support them and did not understand what [UKPC] were doing*”. The allegation was again made during a meeting on 18 June 2018 between representatives of the QSCC board and representatives of UKTC including .

23. Unfortunately, the Councillor decided not to co-operate with the complaints process. In my view, an unjustified failure to engage in a complaints system is liable, by itself, to bring the Council into disrepute. It is clearly important that councillors do not consider themselves, and are not seen to consider themselves, above accounting for their actions in this way.

⁹ In light of the Submissions I should confirm that I did not rely on the allegation in this paragraph (as already appears from the draft report) for any of my conclusions.

24. The Councillor told me that he accepted the informal meeting had taken place. He said he went there as the Ward Councillor and also as a County Councillor. He was there at the invitation of [REDACTED] He denied making any demands of [REDACTED] He accepted that FAMS were looking for space to run their courses, and that USCC was in the market for providing such space. As I understand it, the USCC is effectively controlled by the local mosque. I questioned the Councillor about the control of the USCC, and my impression from a sequence of answers he gave to me was that he was being extremely evasive on this point. I regret to say that I was unable to account for his evasiveness other than as an implicit recognition that the way he dealt with [REDACTED] was inappropriate, and that he sought to favour USCC for reasons of his own. I have reached that conclusion bearing in mind my general findings on the Councillor's credibility which are reflected throughout this report, rather than on one isolated incident by itself. In my view, his evasiveness provides some support both to the [REDACTED] complaint and to complaint I am dealing with.

25. Therefore, the Councillor was unable to account for the use of the word "*demand*", or even something close to it, within the complaint. Similarly, he was unable to account for why the complainant would have alleged that he had said the matter should be kept private and confidential, and not disclosed to QSCC. However, when asked the Councillor was not able to provide any reason for why [REDACTED], or any of the three individuals who had all put their names to the complaint¹⁰, had any motivation to lie or otherwise seek to undermine him.

¹⁰ The Submissions appear to misunderstand this point: The reference to the fact that three individuals were prepared to put their names to this complaint refers to the fact that as well as [REDACTED] of UKTC, had put their names to that complaint. It was these three individuals that the Councillor was asked about at this point in the interview.

26. If the complaint were true, there is an obvious reason for the Councillor not wishing for it to be disclosed to QSCC: It was clearly in conflict with his directorial responsibilities in promoting the best interests of QSCC.

27. The reason the Councillor gave me for not engaging with the QSCC disciplinary processes was that he was intimidated by the idea of explaining to the trustees his side of the allegations. He says he wanted to take representation with him, but was expressly denied that ability. He said he did not ask for that in writing. I do not accept that the Councillor felt intimidated by the mere idea of having to explain his version of events to the trustees.¹¹ has provided a detailed response to these suggestions by the Councillor. He has been categoric in stating that it is not true that the Councillor was refused a representative.¹²

28. In this respect, in my view it is important to look at some of the contemporaneous correspondence. By a letter dated 2 August 2018 the Councillor was told “*You have repeatedly been asked to complete and return the Director’s Code of Conduct. You have not returned a signed copy. Copies have been emailed to you, printed and posted through your door, and copies handed to you in the QS office. The code of conduct is not optional. We would like to meet you face to face to talk through the code. I suggest Monday 6th August after 4.30pm*”. In interview the Councillor accepted that letter was substantially accurate.¹³

¹¹ This finding is based on my assessment of the Councillor during interview as well as my knowledge about the extent of the political roles he has fulfilled for a period of time.

¹² I note the Submissions do not assert that the Councillor was denied the ability to have a representative present.

¹³ The Submissions criticise reliance on this letter, but do not suggest the Councillor (contrary to what he accepted at interview) thought the letter substantially inaccurate (or misleading for that matter).

29. His response to this position was to ask to draft a letter of resignation from the board addressed to the Council. The draft is dated 6 August 2018 and reads as follows “*I regret to inform you that I wish to resign from my position as Trustee and Director of Queen Street Community Centre for personal reasons. I would like to thank you and the employees of Queen Street Community Centre for their help and support over the past year or so and for [sic] giying me the opportunity to serve the community in this way*”. The letter was to be copied to .

In the event the letter was not sent.

30. Accordingly, in terms of contemporaneous written material the Councillor’s position was not that he objected to the way the process was being undertaken by QSCC. He did not raise any issue in relation to , choosing instead to thank the employees (was the only full time employee). Rather, he cited personal reasons for wishing to leave his role.

31. Considering all the evidence above, on the balance of probabilities I prefer Mr account of these events.

32. I note that the Councillor’s non-cooperation in this respect is part of what appears to be a pattern of behaviour affecting the complaint, the complaint (below) and indeed his initial failure to respond to the Council’s formal processes for investigating this complaint. As I understand it, the Councillor was asked on at least six occasions to engage with the QSCC process. As to the initial stages of this complaints process, the Councillor simply failed to respond to the complaint when

issued to him, and I can see no apparent difficulty with him having provided a written response to the Council's monitoring officer. He chose not to do so.¹⁴

33. has alleged in terms that part of the reason for the Councillor seeking to delay his engagement with this process was due to a wish to have any process determined after the next AGM, because the Councillor was actively engaged in a campaign to recruit individuals he thought would be sympathetic to his position to membership of the QSCC. I understand that at the September 2018 meeting there were some 16 new applications for membership, and that number continued to rise to about 30 when I saw . Such interest, he said, was unprecedented since QSCC was set up in 2003. I do not need to reach any specific findings on that matter, and it is unobjectionable in principle that the Councillor might seek to increase the membership of QSCC. Indeed, that goal, pursued for proper purposes, would be entirely laudable. However, what is not appropriate is to frustrate the investigatory and disciplinary procedures of QSCC in the way he did.

34. I regret to say that I have decided that the substance of this complaint is probably true.¹⁵ In any event, in my view there was no adequate justification for the Councillor failing to engage with the disciplinary processes of QSCC. As I indicate above, in reaching that conclusion I have taken into account not only the facts relating to the complaint, but my more general findings on the Councillor's credibility.

¹⁴ It is not a persuasive answer to this point to say the Councillor was not *required* by the rules to submit written representations. It was plainly open to him to have acknowledged the complaint and sought to set out his position clearly at an earlier stage, with a view to defending himself against the Complaint.

¹⁵ The Submissions criticise the use of this phrase, but it is an application of the civil standard of proof, which I have applied to my investigation.

C. The Councillor acted inappropriately in the use of QSCC resources and towards
as an employee of QSCC

35. The Board's Code makes clear at paragraph 4.1 that directors may use the facilities or rooms at QSCC in the same way as other members of the community. By paragraph 4.2 directors must not use their position to unduly influence staff. This paragraph is a clear recognition of the risk posed by directors wielding the power that is conferred by their role and position in an inappropriate way.

36. I have seen the notes of a meeting on 19 July 2018 where [REDACTED] voiced various concerns he had about the Councillor's behaviour. The first of those relates to the complaint I have dealt with above.

37. Before turning to the rest of [REDACTED]'s complaints I should note that I put the substance of those complaints to the Councillor during interview. The key elements of his responses are recorded below. Because there were some elements of the Councillor's response which in my view simply could not stand with what had said (i.e. it was more than a case of mere mistake or misunderstanding, one of the witnesses was telling the truth and the other was not) I asked the Councillor whether he thought [REDACTED] had any reason to be untruthful. He said "*I don't know why I [REDACTED] is making these things up*" and later said he could not think of any reason why [REDACTED] would fabricate material against him.

38. The second complaint relates the Councillor interfering directly in a karting fun day organised at the QSCC. The allegation is that the Councillor stepped in to turn off music that was being played, and made comments about the area being a "Muslim area" where a quieter environment was required on a Sunday. During interview the Councillor told me that he simply asked for the music to be turned down on the basis

the area was residential with disabled people in the vicinity; and said he did not himself either turn the music down or turn it off. I raised this issue directly with Mr [REDACTED] and I have his detailed response, which is available to those considering this report. In short, he disputes the Councillor's version of events and gives a clear and detailed narrative of what happened on that day. Like the Councillor, I cannot see any reason why [REDACTED] would misrecollect or deliberately falsify this (or his other allegations), and I prefer his explanation of this event on the balance of probabilities.

39. The third complaint relates to a meeting on 19 July 2018 of which [REDACTED] made a near contemporaneous note. It was at this meeting that it is said the Councillor let Mr [REDACTED] in on his plan to become the Chair of QSCC by essentially seeking to change the composition of the board and the membership as well; it appears he wished to have [REDACTED]' support. [REDACTED] was, of course, an employee answerable to his employer for all usual duties including fidelity and loyalty. [REDACTED] was not receptive to the approach and the Councillor changed tack asking what he could do for [REDACTED] to make his position stronger. The Councillor also, towards the end of the meeting, asked for it to be kept confidential especially from the current Chair. In that respect the Councillor's approach here is consistent with the [REDACTED] allegation against him. It seems to me this was an obviously inappropriate approach to an employee.

40. The Councillor responded to this allegation by stating that [REDACTED] had in fact given him the requisite forms and that [REDACTED] was positively encouraging the Councillor to take those steps towards changing the governance of QSCC because he recognised that QSCC had a problem with diversity. The Councillor recognised that it was a curious thing that [REDACTED], given his responsibility and knowledge of the

forms, had in fact given the Councillor the wrong/old version of the form in question.

has again provided detailed further information on the Councillor's response, consistent with his earlier contemporaneous note. He substantially rejects the Councillor's account of this meeting.

41. My assessment of this head of complaint is influenced by the two further heads of complaint which, if accepted, taken together appear to show an entirely improper approach to an employee by seeking to coerce his behaviour and require him to do many things outside of his contract of employment.

42. The fourth allegation relates to the Councillor requiring (or at least asking) to repeatedly assist him with matters outside of his contract of employment during the working day, in particular with work of a political nature.

43. The Councillor's response to this allegation was that he used ' services and the printing services in the building as a customer. He told me he was actively encouraged to use the printing services by because the centre would benefit as a result of the payments. He told me he once paid £10.60 for his printing, that the centre manager had never tried to stop him printing, and that he used the centre as a customer as well. He did not particularise any other payments or bring proof of payments. He said he had only used the printer 6-7 times during the previous 3 year period and that he paid for it on each occasion. In relation to the creation of political material with ' help, he said that it had only happened perhaps 4 or 5 times; maybe for 60% of the 6-7 occasions of printing. His case was that Mr was positively volunteering his services in this way and positively encouraged the Councillor to bring political or other material to him if he had any queries

concerning grammar etc.. The key element of his case was to say that any such requests or use was, overall, trivial in extent.

44. Again, has provided a detailed rebuttal to the Councillor's version of events. As with the other rebuttal material it has not been put specifically to the Councillor for comment, but the position remains (as with 'other allegations) that the two accounts cannot stand together. One must be right, the other wrong. ' rebuttal is consistent with his original complaint. His account really is the opposite of what the Councillor told me. For example, ' evidence is that the Councillor approached him for assistance at least once a fortnight for the 3 years 2015, 2016 and 2017 dropping to a monthly basis in 2018. On each occasion, the assistance was specifically to do with a political publication or issue. It was not the QSCC's business. However, on what has said, the Councillor appears to have equated political activity with activity for the benefit of the community.

45. In relation to the use of the QSCC printer says that happened on an almost weekly basis and during political periods sometimes several times a week. has said, point blank, that the Councillor did not pay for the printing which was undertaken, and that the printing was on a substantial scale. On a very rough measure puts the total cost over the years at about £1,000. The one exception to the failure to pay, which broadly tallies with what the Councillor told me, is a single payment of approximately £8 which the Councillor said was to cover all the previous printing.

46. The fifth allegation is the Councillor told that he knew his landlord and that the Councillor had used that fact, and an allegation of "criminal activities" by Mr

, to apply improper pressure to him. I should note first of all that the Councillor never sought through the proper channels to have any investigation made of [REDACTED]’ conduct so far as I am aware, and when the Councillor was interviewed by me it became apparent that he was not making any allegation of impropriety or criminality against [REDACTED]. Rather, his case is what he was told by some PCSO’s that “*someone had been carrying a shotgun*” in the vicinity of [REDACTED]’ home.

47. However, the near contemporaneous note recorded by [REDACTED] of his discussion with the Councillor on 13 July 2018 is, again, very different. In essence the Councillor approached [REDACTED] in public during a busy youth club evening in the entrance / car park area to building. He said that the Burton Daily Mail had asked him about criminal activities [REDACTED] had allegedly been involved in relating to his position at QSCC. When pressed, the Councillor declined to give any particulars. Mr [REDACTED] told the Councillor he had no idea what he was talking about. [REDACTED] was understandably upset about this allegation particularly in light of his employment in a children’s centre.

48. On this account, if the Councillor believed what he was apparently being told by a journalist, then plainly he ought to have reported it to the board. He did not. Equally, if he did not believe it, then he should not have taken it up with [REDACTED] in the way that he did. Delivered in the way it was, it leaves the impression of the Councillor, who is also a director, and in a position of authority through both those roles, suggesting to an employee of the trust that he knows something unfortunate about him, disclosure of which could harm his reputation and his job security. That explanation is consistent with the elaboration on this point provided by [REDACTED] in his rebuttal material.

49. This kind of behaviour seems to strike a chord with what also alleged happened relating to his landlord; and the Councillors repeated references to the fact that he knew landlord (as well as his son).

50. Therefore, taking the third fourth and fifth heads of complaint together a stark question arises on the balance of probabilities as to whose account more likely to be accurate. I prefer ' account of those matters. My main reasons are:

- a. The Councillor's failure to address these matters at any stage prior to interview by me. As set out above, I do not accept the reasons he gave in that respect.
- b. The allegations against the Councillor come from three different sources namely . The Councillor has not persuasively suggested any of those three has a motivation to be untruthful.
- c. complaints are substantially reliant on contemporaneous notes. The Councillor has not sought to rely on any form of contemporaneous correspondence, be it notes, email or any other form, to support his recollection of events.
- d. The Councillor's narrative in relation to his dealings with is the wrong way around. It was the Councillor who was in the position of relative power and who, it is clear, gave various instructions to over a period of years. Yet on his account the objectionable activities were all being facilitated if not promoted by . In my view, that does not ring true. It certainly does not explain why, if had genuinely previously been

so supportive, he is now central to the complaints being made against the Councillor.

- e. The Councillor's general approach to discharging his duties as a director raises questions in itself. There is no controversy about the extent of his absences from board meetings.
- f. There is a consistency and level of detail to ' complaints which, to my mind, hangs together.
- g. Lastly, it is clear that there was an inexplicable level of delay in the Councillor actually signing up to the obligations contained in the Board's Code. This delay was not one or days, weeks or months, but years. It is suggestive of a reluctance to be held to those rules and standards.

Conclusion

- 51. In light of my findings above there are various allegations which provide evidence of a breach of the Code inasmuch as they risk bringing the Council into disrepute. In relation to the third, fourth and fifth allegations made by , in my view, they do provide evidence of a failure to abide by paragraphs 3.4 and 3.1 of the Code.

CORNERSTONE BARRISTERS

17 DECEMBER 2019