

## THE TEACHING AGENCY

### DECISION OF A PROFESSIONAL CONDUCT PANEL

**Teacher:** Ms Catherine Louise Reynolds

**Teacher Ref:** 0756031

**TA Case Ref:** 8577

**Date of Determination:** 29<sup>th</sup> November 2012

**Former Employer:** Saddleworth School

#### **A. INTRODUCTION**

A Professional Conduct Panel ("the Panel") of the Teaching Agency convened on Wednesday, 28<sup>th</sup> and Thursday, 29<sup>th</sup> November 2012 at 53-55 Butts Road, Earlsdon Park, Coventry CV1 3BH to consider the case of Ms Catherine Louise Reynolds.

The Panel Members were: Mr David Longson (Teacher Panelist - in the Chair); Cllr Gail Goodman (Teacher Panelist) and Dr Lei Meleyal (Lay Panelist).

The Legal Adviser to the Panel was Mr Robin Havard of Morgan Cole LLP, Solicitors.

The Presenting Officer for the Teaching Agency was Ms Lucy Alicea of Kingsley Napley LLP, Solicitors.

Ms Reynolds was neither present nor represented.

The hearing took place in public and was recorded.

#### **B. ALLEGATIONS**

The Panel considered the allegations set out in the Notice of Proceedings dated 13<sup>th</sup> March 2012.

It was alleged that Ms Catherine Louise Reynolds was guilty of unacceptable professional conduct, in that she:

1. Used inappropriate language towards pupils;
2. Made inappropriate comments and remarks to pupils:
  - (a) of a personal nature;
  - (b) of a sexual nature;

- (c) regarding members of staff and other pupils;
3. Behaved inappropriately in the classroom during lessons by:
    - (a) allowing pupils to use inappropriate language;
    - (b) allowing pupils to use mobile phones and iPods;
    - (c) showing pupils her tattoos;
    - (d) showing irrelevant/inappropriate videos to pupils;
    - (e) using the internet for her personal use;
  4. Encouraged pupils to contact her via a social networking website, despite previous management instruction not to; and
  5. Made inappropriate comments on a social networking website following a parents evening.

Whilst certain partial admissions had been made by Ms Reynolds in her written submissions, in the response to the Notice of Proceedings, Ms Reynolds had admitted neither the facts nor the allegation of unacceptable professional conduct and therefore the Panel approached the case on the basis that all matters were denied.

## **C. SUMMARY OF EVIDENCE**

### **Documents**

In advance of the hearing, the Panel received a bundle of documents which included:

- Section 1: Anonymised Pupil List (pages 1 to 2);
- Section 2: Notice of Proceedings and Response (pages 3 to 7);
- Section 3: Teaching Agency Statements (pages 8 to 40);
- Section 4: Teaching Agency documents (pages 41 to 463);
- Section 5: Teacher documents (pages 464 to 481).

The Panel Members confirmed that they had read all of the documents in advance of the hearing.

No further documents were produced in evidence by either party save for a table produced by the Presenting Officer entitled "Table Showing Pupil Evidence for Particulars of Allegation".

### **Brief Summary of Evidence**

Please note that this is intended to be a summary and does not reflect the complete evidence given.

## **Witness A**

The Presenting Officer's first witness was Witness A, the Head Teacher of Saddleworth School throughout the material time. Witness A confirmed that the content of her Witness Statement (pages 8 to 28) was true to the best of her knowledge and belief. The Witness Statement was taken as read. Witness A, in oral evidence, stated that:

- Every year, the policy documents and guidance were issued to the teachers and they would sign for them. The Head of Child Protection at the school, Individual A, and Witness A would outline why the policies were important and the teachers were given a deadline by which to read the documents and sign to confirm that they had done so.
- With regard to the entries placed by Ms Reynolds on Facebook following the parents evening on 23<sup>rd</sup> September 2010, Ms Reynolds apologised but no reason was given for her conduct. The number of friends on Facebook could have been as many as 200.
- If pupils approached Ms Reynolds regarding personal matters, she should have referred the pupils to a member of Senior Management or one of the pastoral staff.
- Witness A outlined her knowledge of the pupils to whom she spoke, namely Pupils A to I, and the basis on which she concluded that their accounts were credible.
- With regard to the playing of videos to the class, Witness A said that, every year, the Heads of Department were reminded that, in the run up to the Christmas period, it was still necessary to continue to teach and that this reminder should be disseminated to staff. Whilst there was no prohibition on the showing of videos, when Ms Reynolds was suspended, Witness A kept Ms Reynolds's computer and planner. A schedule of the films shown to the class and the dates on which they were shown was prepared. One of the films, namely "Eurotrip" was watched by Witness A some 4 days before Ms Reynolds's disciplinary hearing and Witness A considered the film had everything in it with which teenagers should not be associated.
- Witness A confirmed that she had seen the Facebook screenshot on which the comments were made following the parents meeting on 23<sup>rd</sup> September 2010.
- RE was a three person department. When the Head of Department left, Ms Reynolds and the other colleague were asked to act up and there was a delay in the school's ability to advertise pending the outcome of the period of an appeal by the Head of Department. Witness A told both Ms Reynolds and her colleague that the Senior Management

sympathised with their position and provided as much support as possible.

- A complaint was received from a parent in November 2010 concerning various rumours circulating the school in relation to Ms Reynolds and Witness A investigating those rumours only seemed to make matters worse. However, despite Ms Reynolds indicating that she felt very concerned and anxious about the rumours, she took no time off nor did she ever produce any medical evidence to support indications she gave of suffering from stress. Witness A considers that she supported Ms Reynolds who was also working with a colleague in the RE Department who was an excellent teacher and fine person. Witness A also considered that Ms Reynolds understood the importance of the policies and the guidance.
- Despite the warning provided to Ms Reynolds by letter of 1<sup>st</sup> February 2011, things seemed to be worsening. Ms Reynolds was a teacher who, in September 2010, had written comments on Facebook for which there was no excuse and then went on between January and March 2011 to behave in a way which gave rise to further concern. Witness A believed that Ms Reynolds was “going downhill fast”.
- In March 2011, everything met with denial except where there was undeniable documentary proof.
- There was no intention of any witch hunt but it was clear that Witness A had to investigate the various complaints being made by pupils. Whilst pupils may have been angry or considered themselves to be in trouble, that was not to say that what they were saying was untrue and Witness A did not believe there had been any collusion between pupils.
- Having read the responses of Ms Reynolds, Witness A stated that she was always meticulous in following up meetings and noting what was said. Following her initial consultations with pupils, she then consulted with Individual B and, on Individual B taking up the investigation, Witness A then took a step back to ensure that it was an entirely objective process.

## **Witness B**

The Presenting Officer's second witness was Witness B who had been a teacher at the school since 1996 and who became Assistant Head Teacher in September 2005. Witness B confirmed that her Witness Statement (pages 37 to 40) was true to the best of her knowledge and belief. Her Witness Statement was taken as read. In oral evidence, she stated that:

- Witness B knew Pupils A to I very well. She had taught a number of them as well as knowing them throughout the time that she had been

Assistant Head Teacher and described them as good, loyal and honest and were individuals of integrity.

- Witness B did not have any involvement in the investigation prior to Witness A asking her to provide support for the pupils during their interviews nor was Witness B involved in the initial selection of pupils to be interviewed.
- In her experience, there was no evidence of any of the pupils holding a grudge for Ms Reynolds. There was no evidence of any attempt on the part of Witness A to carry out a “character assassination” of Ms Reynolds. Witness B found Witness A to be a hard working, professional and honest Head Teacher.

#### **D. DECISION AND REASONS**

The Panel announced its decision and reasons as follows:

We have now carefully considered the case before us and have reached a decision.

We confirm that we have read all the documents provided in the bundle in advance of the hearing.

##### **Brief Summary of the Case**

In September 2008, Ms Reynolds commenced employment as a teacher of Religious Education at Saddleworth School, High Street, Uppermill, Oldham, OL3 6BU. This was Ms Reynolds first teaching post having joined as a newly qualified teacher.

According to the evidence of Witness A who was Head Teacher at the School throughout the material time, between 2008 and September 2010, Ms Reynolds showed herself to be a good teacher. However, following an incident in September 2010 relating to Ms Reynolds putting wholly inappropriate and offensive material on Facebook, further complaints were made against her in January and March 2011 relating to her conduct towards pupils at the school and her general behaviour.

Following a detailed investigation which commenced in March 2011, Ms Reynolds was suspended by the Head Teacher on 18<sup>th</sup> March 2011 and subsequently resigned from her post on 25<sup>th</sup> July 2011.

This case relates to allegations surrounding Ms Reynold’s failure to maintain appropriate professional boundaries with pupils and behaviour on the part of a teacher which was wholly inappropriate and contrary to the best interests of the pupils of which she had charge.

## Findings of Fact

Our findings of fact are as follows:

We have found the following particulars of the allegation(s) against Ms Reynolds proven, for these reasons:

1. Used inappropriate language towards pupils

The Panel heard evidence from two witnesses: the Head Teacher at the school at the material time, Witness A, now retired, and Witness B, who has taught at the school since 1996 and who has been Assistant Head Teacher since 2005. The Panel found both witnesses to be credible, reliable and measured.

The Panel finds that Ms Reynolds was fully aware of the provisions contained within the document entitled Guidance for Safer Working Practice for Adults who work with Children and Young Children. The sections of the Guidance relevant not only to this particular but a number of the other particulars are set out at paragraph 8 of the statement of Ms Cornish. The complete document is contained at exhibit 58.

Ms Reynolds did not dispute that she had used inappropriate language towards pupils. Ms Reynolds met with Witness A and Individual C on 26<sup>th</sup> January 2011 as a result of complaints having been made by parents of children from two year groups in relation to the language being used by Ms Reynolds.

In a letter dated 1<sup>st</sup> February 2011, Witness A wrote to Ms Reynolds summarising what was said at the meeting. It was confirmed by Ms Reynolds that, whilst in the class, she was likely to have made the following remarks:

“If you don’t want to learn RE you can piss off”

“Stop bloody talking”

“Sit on your arse” (to the class)

The letter was sent to Ms Reynolds who, by email of 2<sup>nd</sup> February 2011, acknowledged safe receipt. At no stage was the content of the letter challenged.

The Panel finds that Ms Reynolds made the said remarks and that such remarks towards pupils were inappropriate.

In addition, whilst denied by Ms Reynolds, the Panel finds that she used inappropriate language towards pupils on a regular basis.

On 8<sup>th</sup> March 2011, Pupil A had approached a senior learning mentor at the school, Individual D, expressing her concern at the behaviour of Individual D and the sort of remarks being made and language used by her to the pupils.

Ms Leach reported the matter to Witness A who then arranged to speak to Pupil A. As a consequence of what was said to her by Pupil A, Witness A decided it would be appropriate to speak immediately to Pupils B and D from Year 10 and Pupil C from Year 11. This was to ensure that there was no risk of collusion.

On 9<sup>th</sup> March 2011, Pupils E and F came to see Witness A about what had been said to Pupil E by Ms Reynolds.

Following Ms Reynold's suspension on 18<sup>th</sup> March 2011, Individual B, a Senior Human Resources Advisor for schools within Oldham, re-interviewed on 21<sup>st</sup> March 2011 all those pupils who had been interviewed by Witness A save for Pupil B. Those interviews took place in the presence of Witness B who attended as support for those pupils.

The evidence provided by the pupils is consistent both as between each other and in respect of the accounts they gave to Witness A and subsequently to Individual B. On the balance of probabilities, whilst appreciating that it is hearsay evidence, the Panel nevertheless accepts their evidence.

In reaching this conclusion, the Panel accepted the evidence of Witness A and, more particularly, Witness B as to the reliability and credibility of the pupils who were interviewed. Witness B indicated that, not only did she know all the pupils involved, but she had personally taught a number of them in the past. Witness B considered the pupils to be loyal and honest and that they were individuals of integrity. Witness A indicated that she considered Pupil A to be a "rough diamond" but "straight". In respect of Pupils E and F, Witness A had consulted with the teacher responsible for their pastoral care who had said that there was no reason to disbelieve what the pupils had said.

By contrast, although denying much of what had been alleged, whilst it was her absolute right, Ms Reynolds had not attended to give evidence and the Panel had concerns as to her credibility as exemplified in respect of the findings in relation to Particulars 3(d) and (e) below.

Consequently, the Panel finds that on regular occasions, whilst in class, Ms Reynolds would use such language as: "shit", "fuck you", "slag", and "bastard".

On one specific occasion, Pupil E had gone to see her and he was told by Ms Reynolds to "fuck off" and that she did not want to see him.

For these reasons, the Panel found this particular proven.

2. Made inappropriate comments and remarks to pupils:

(a) of a personal nature;

It was accepted by Ms Reynolds that she had informed the class of circumstances in which she had taken a morning after pill and an occasion when she told the pupils in the class about a relationship she had formed with an older man. The Panel finds that Ms Reynolds also made reference to her social life and occasions when she has been drinking alcohol to excess.

(b) of a sexual nature;

The Panel accepts the evidence of pupils C to I and finds that Ms Reynolds made numerous references to sex from a personal perspective. One pupil states that Ms Reynolds stated how “sex is good and says not to get married because then you can’t sleep around” and “you should have sex all the time”.

Ms Reynolds accepts, and the Panel finds, that, whilst she immediately regretted doing so, she had informed the pupils in class that she travelled to Amsterdam and that there was a sex show involving a horse and a woman. Whilst denied, the Panel also finds that Ms Reynolds told the pupils that she had been for a naked massage.

(c) regarding members of staff and other pupils;

Ms Reynolds described another teacher to Pupils D, E, and F as a “bitch” and that nobody liked her.

When speaking to Pupil C, Ms Reynolds stated that Witness A may be leaving and then said “I may stay now that bitch is going”

Ms Reynolds spoke to Year 10 pupils such as Pupil D about a boy in the same year who she said dressed up as a girl or otherwise described him as a cross-dresser.

3. Behaved inappropriately in the classroom, during lessons, by:

(b) allowing pupils to use mobile phones and iPods;

It is accepted by Ms Reynolds, and the Panel finds, that she allowed pupils to wear ipods whilst working in class. Pupils such as Pupils E and F also confirm that Ms Reynolds allowed pupils to use mobiles in class. The Panel finds such behaviour to be



inappropriate and contrary to school policy of which Ms Reynolds was aware.

- (c) showing pupils your tattoos;

Ms Reynolds states that were any of the pupils to have seen any of her tattoos, this would have been accidental or not deliberate. However, the Panel prefers the evidence of Pupils A, C and E to H and finds that Ms Reynolds moved her clothes so that pupils could observe the tattoos on her lower back and her thigh and, in doing so, acted inappropriately.

- (d) showing irrelevant/inappropriate videos to pupils;

The Panel accepts the evidence of Pupils E to H and finds that Ms Reynolds showed the pupils videos which were either irrelevant or inappropriate or both.

Ms Reynolds indicated that she would show videos or films to the class but only at Christmas times or on "snow days". However, Witness A produced an extract from Ms Reynold's planner which lists a number of films shown to the pupils and the dates on which they were shown.

One example of a film which was both irrelevant and inappropriate was one entitled "Eurotrip" which is dated in the planner on 5<sup>th</sup> October 2010 i.e. neither in the Christmas period or a snow day. Furthermore, in the course of the investigation, Witness A watched the film and found its content to be both irrelevant and wholly inappropriate to be shown to pupils in school time. Pupils E and F indicated that it seemed to them as if Ms Reynolds would sometimes show a film when "... she can't be bothered teaching"

- (e) using the internet for your personal use;

The Panel finds that Ms Reynolds was well aware of the Acceptable Use Policy of the School and had signed the Acceptable Use Agreement. One stipulation of the Agreement is that Ms Reynolds agrees that she will only use the school's internet for professional purposes or for uses deemed reasonable by the Head or Governing Body.

When initially interviewed about this allegation, and before being furnished with documentary evidence, Ms Reynolds denied that she had made inappropriate use of the school's internet.

However, Ms Reynolds was then served with pages of internet use documents and the entries in red indicate the access made

to sites which are unrelated to her teaching duties but at a time when she would have been taking a class.

Furthermore, Pupils F and H confirm that whilst they were watching films, Ms Reynolds "...is on the laptop".

4. Encouraged pupils to contact you via a social networking website, despite previous management instruction not to

By a letter dated 14<sup>th</sup> October 2010, Witness A wrote to Ms Reynolds by way of follow-up to a meeting at which they and Mr Hall attended and at which the circumstances giving rise to Particular 5 were discussed. Ms Reynolds had confirmed that she understood the many warnings that had been provided and instructions given to staff about the absolute requirement for professionalism in using social networking sites and the risks posed by their misuse. Ms Reynolds confirmed that she understood and adhered to these instructions and that she would not network with pupils either current or past.

Reference is then made to the comments made on Ms Reynold's Facebook page which is the subject of Particular 5.

At the end of the letter, Witness A refers to various memoranda, policies and guidance regarding the professional expectations of a teacher.

However, when Pupils E, F and I were interviewed in March 2011, they indicated, and the Panel finds, that Ms Reynolds was in contact with them via Facebook. Indeed, in the case of Pupil E, Ms Reynolds had told him to "... type her husband's name in Facebook "J.... P...." it says on his profile who he is married to then we can click on Catherine Reynolds and we can "inbox" her a message". When asked why this process was suggested, the pupil was told that Ms Reynolds did not want the staff to see it.

Consequently, the Panel finds this Particular proved.

5. Made inappropriate comments on a social networking website following a parents evening

A parents' evening was held at the school on Thursday 23<sup>rd</sup> September 2010 in respect of Key Stage 4 pupils.

Later that day, Ms Reynolds placed the following remarks on her Facebook page:

"That was the most fucking horrendous evening of my life"

"Fucking retarded parents that's what"

“That’s because only eejits pick RE”

Witness A confirmed when giving evidence that she had seen and read the remarks set out above.

Witness A and Individual E met with Ms Reynolds on 6<sup>th</sup> October 2010 when she admitted that she had placed the remarks on her Facebook page. Furthermore, Ms Reynolds confirmed that not only would other members of staff been able to read the remarks but also an indeterminate number of other people to include members of the public and friends outside school.

The Panel finds that to place such comments on a social networking website was wholly inappropriate, offensive and extremely serious.

We have found the following particular of the allegation against Ms Reynolds not proven, for these reasons:

3. Behaved inappropriately in the classroom, during lessons, by:
  - (a) allowing pupils to use inappropriate language;

Whilst a number of the pupils confirm that Ms Reynolds did allow them to use inappropriate language, there is a lack of particularity in relation to this allegation and the Panel is not satisfied that it has been proved.

### **Findings as to Unacceptable Professional Conduct/Conduct that may bring the profession into disrepute**

Having found the facts of all particulars of the allegation proved other than Particular 3(a), the Panel further find that Ms Reynolds’s actions amount to unacceptable professional conduct and conduct that may bring the profession into disrepute.

By reference to Principle 1 of the GTC’s Code of Conduct and Practice for Registered Teachers, Ms Reynolds failed to follow the school’s child protection policies and procedures and failed to establish and maintain appropriate professional boundaries in her relationships with children and young people.

Ms Reynolds also failed to adhere to Principle 6 in that she failed to uphold school policies and procedures and Principle 8 by failing to maintain reasonable standards in her own behaviour so as to maintain an effective learning environment and doing everything to ensure that the trust of the public in the profession is maintained.

Ms Reynolds also acted in breach of the Teachers’ Standards in particular Part One in that she failed to demonstrate consistently the positive attitudes, values and behaviour which are expected of pupils, and Part Seven relating to the expectation of good and courteous behaviour in the classroom.

The Panel also finds Ms Reynolds to be in breach of Part Two in that she failed to uphold public trust in the profession by failing to treat pupils with dignity, failing to build relationships rooted in mutual respect and failing to observe proper boundaries appropriate to a teacher's professional position.

The inappropriate behaviour of Ms Reynolds was wide-ranging and continued despite a number of warnings having been provided by Witness A. The Panel reject Ms Reynolds contention that Witness A's approach was designed to attempt to bring about Ms Reynolds' "character assassination". There is no evidence at all to support such an allegation. Indeed, having heard her evidence, the Panel is satisfied that Witness A afforded Ms Reynolds considerable latitude, being sympathetic to the pressures under which Ms Reynolds and her colleague were having to operate following the departure of the Head of the RE Department.

Whilst the Panel has taken very careful attention of the written submissions of Ms Reynolds, to include her partial admissions of certain of the particulars, the Panel considers that Ms Reynolds has shown a considerable lack of insight into her behaviour and the serious nature of her behaviour.

The Panel had not been provided with any relevant testimonials although Witness A indicated that Ms Reynolds had shown herself to be a good teacher prior to the issues of concern which commenced in or about September 2010. However, it should be borne in mind that Ms Reynolds only qualified as a Teacher in September 2008.

The Panel has concluded that the findings of unacceptable professional conduct are serious and that the behaviour overall is bound to have damaged the trust the public have in the profession and the reputation of the profession itself.

### **Panel's recommendations to the Secretary of State**

The Panel has considered carefully the guidance contained in the document entitled "Teacher misconduct - the prohibition of Teachers"

Taking account of its findings, both in terms of the facts and of unacceptable professional conduct, the Panel considers that it is proportionate and in the public interest that a Prohibition Order is made and therefore makes this recommendation to the Secretary of State.

When the wide-ranging nature of Ms Reynolds's behaviour is taken into account, the regular use of inappropriate and offensive language in front of pupils, the inappropriate and offensive entries made on Facebook relating to not only pupils but their parents, and the topics of a highly personal nature discussed in front of pupils, the Panel considers that a Prohibition Order is necessary: for the protection of children and other members of the public, to maintain the confidence of the public in the profession, and to uphold proper standards of conduct.

Indeed, a number of the pupils themselves had expressed concern that the behaviour of Ms Reynolds was affecting their progress. Pupil A states “I don’t feel I am taught anything”. Pupil C states “In Year 9 I was getting level 5’s and 6’s but now she talks about stories in lessons and I can’t focus”.

It is also worth noting that Ms Reynolds had been shown considerable support by the school and in particular Witness A. Furthermore, the inappropriate conduct continued despite having received warnings and extensive guidance from the School. Indeed, the School took a highly supportive approach to Ms Reynolds after the serious incident of misconduct in September 2010 when she put material on Facebook which was highly offensive and derogatory of pupils and their parents.

Despite such support, Ms Reynolds attitude has been to level criticism at Witness A and placing responsibility for much of what transpired with Witness A. However, the Panel found neither evidence nor motive to support such a suggestion.

The Panel had not had the benefit of hearing from Ms Reynolds nor had it received any material in mitigation other than for some expressions of regret contained in her written submissions regarding certain of the events giving rise to the proceedings. No relevant testimonials had been provided.

Ms Reynolds singularly failed to act as a role model to her pupils. Her behaviour represents a serious departure from the personal and professional conduct elements of the Teaching Standards and was misconduct which would seriously affect the education and/or wellbeing of pupils and there is no evidence to suggest that this risk is not ongoing. It also illustrates evidence of a deep-seated attitude that can lead to harmful behaviour.

On the basis of the particulars we have found to be established we recommend that Ms Reynolds should be allowed to apply for the Prohibition Order to be set aside after a period of five years has elapsed. Such an order would allow Ms Reynolds, if she wishes to do so, to advance reasons as to why she should be considered suitable at that time to teach again. It accords with our duty to consider the proportionality of the recommended Prohibition Order.

### **Secretary of State’s Decision and Reasons**

**I have given very careful consideration to this case and to the recommendation of the panel both in respect of the sanction and a review period.**

**Ms Reynolds’ behaviour has been found to be unacceptable. Indeed the Panel has pointed to the wide-ranging and regular misconduct displayed. This behaviour has directly impacted upon pupils, on colleagues and even parents. Learning of pupils has also been impacted upon.**

**Despite support and advice Ms Reynolds appears to have continued to behave in a manner which falls seriously short of that expected from a teacher. The Panel have been able to identify limited understanding, insight or remorse.**

**I support the view that Ms Reynolds should be prohibited from teaching.**

**I turn now to the review period. Ms Reynolds was a newly qualified teacher and there were some challenges in the department. I support the view that a five year review period will provide Ms Reynolds, if she wishes, with opportunity to consider whether she wishes to teach again, and if so apply to a panel to evidence that suitability.**

This means that Ms Catherine Reynolds is prohibited from teaching indefinitely and cannot teach in any school, sixth form college, relevant youth accommodation or children's home in England. She may apply for the Prohibition Order to be set aside, **but not until 6 December 2017**. If she does apply, a panel will meet to consider whether the Prohibition Order should be set aside. Without a successful application, Ms Catherine Reynolds remains barred from teaching indefinitely.

This Order takes effect from the date on which it is served on the Teacher.

Ms Catherine Reynolds has a right of appeal to the Queen's Bench Division of the High Court within 28 days from the date she is given notice of this Order.

**NAME OF DECISION MAKER: Alan Meyrick**  
**Date : 30 November 2012**