EMPLOYMENT TRIBUNALS

Claimant: **Mr. W Murray**

Respondent: **Network Rail Infrastructure Limited**

Heard at: **Midlands West (In Public; By video)**

On: **29 and 30 September 2025**

Before: **Employment Judge C Knowles**

Representation
Claimant: Mr. Murray (Litigant in person).
Respondent: Ms. K Minto (Counsel)

JUDGMENT having been sent to the parties on 1 October 2025 and written reasons having been requested in relation to the dismissal of the unfair and automatically unfair dismissal complaints in accordance with Rule 60 of the Employment Tribunals Rules of Procedure, the following reasons are provided:

REASONS

1. The Preliminary Hearing was listed by Employment Judge Perry for the purposes of:
    1.1 Identifying the last acts complained of.
    1.2 Identifying whether the claim is out of time and if it is, would it be just and equitable to extend time; (*This related to complaints brought under the Equality Act 2010).*
    1.3 Identifying whether it was reasonably practicable for the claim to have been brought in time and if not, was it presented within a reasonably practicable period.

2. Employment Judge Perry directed that if the Tribunal decided it had jurisdiction to hear the claim and time allowed the Employment Judge may also address the claimant's application to amend, and case management.

DOCUMENTS AND PROCEDURE AT THE PRELIMINARY HEARING

3. As agreed on the first day, we took short breaks during the preliminary hearing every 1.5 hours or so. I explained to the parties that if additional breaks were required, they should ask.

4. Having discussed the order of matters with the parties and considered the decision in Sakyi-Opare v The Albert Kennedy Trust [UKEAT/0086/20/AT], we spent the first day of the hearing identifying the complaints in the claim form and identifying the last acts, identifying what the claimant was seeking to add by way of amendment, and then hearing submissions on and deciding the application to amend. I reached my decision on the amendment application and gave oral reasons for that on the first day of the preliminary hearing (29 September 2025).

5. Following the decision on amendment, it was then possible to identify the last acts in respect of each complaint. For the purposes of the hearing, the parties provided a preliminary hearing bundle of 346 pages. In addition, I was provided with two emails sent from the claimant to Neil Gaskin dated 7 and 11 March 2025. I heard evidence from the claimant, his responses to cross-examination by the respondent's counsel, and oral submissions from each party. I was also provided with, and read, written submissions from each party.

6. I reached my decision on the preliminary issue of time limits on the second day of the preliminary hearing (30 September 2025) and gave oral reasons for that. The written Judgment was sent to the parties on 1 October 2025.

7. On the 1 October 2025, the claimant submitted a request in writing for written reasons in respect of the decision to dismiss his complaints of unfair dismissal on the basis that they had been brought out of time. As neither party has made a request for written reasons in respect of the decisions made in the claimant's favour that it was just and equitable to extend time in respect of complaints brought under the Equality Act (**EA**) 2010, these written reasons deal solely with the decision to dismiss the complaints of unfair dismissal as recorded at paragraphs 1 and 2 of the Judgment sent to the parties on 1 October 2025.

THE COMPLAINTS AND THE LAST ACTS

8. Following my decision on the application to amend, the relevant types of complaint and last act alleged (in so far as the complaints of unfair dismissal under Section 98 and Section 103A of the Employment Rights Act 1996 are concerned) are as follows:

Complaints under the Employment Rights Act 1996

8.1 Unfair Dismissal (S.94 and 98 ERA 1996). The parties agree that the effective date of termination was 31 October 2024.

8.2 Automatically unfair dismissal on grounds of having made a protected disclosure (S.103 of the ERA 1996). The parties agree that the effective date of termination was 31 October 2024.

FINDINGS OF FACT

9. The claimant was employed by the respondent, latterly as a Mobile Incident Officer, from 16th November 2016 until his dismissal on 31st October 2024.

10. Between 31st October 2024 and 20th March 2025 the claimant had continuous access to the internet.

11. On 11th November 2024 the claimant notified ACAS for the purposes of early conciliation.

12. The claimant appealed his dismissal, and a first appeal hearing took place on 4th December 2024 but was adjourned. The claimant said in cross-examination that he had used a free legal advice page for searching since his appeal started but had only paid for advice in the last few weeks prior to the preliminary hearing.

13. On 23rd December 2024 an early conciliation certificate was issued.

14. The claimant started work as an Intelligence Analyst on 2nd February 2025. He told me that at that time it was not full-time. He was working on a self-employed basis at that time. He told me that the estimated annual income

of £42,000 that he referred to in his claim form was based on his first three months of work, and assuming that he continued to do that work.

15. On 7th March 2025 the claimant sent an email to Neil Gaskin, the appeal hearing manager. The claimant said that the 20th March was acceptable for the appeal hearing. He also said that:

"*I have a legal deadline of 23rd March to submit an ET1 tribunal claim. As my appeal is taking place so close to this date, I will be proceeding with my claim regardless of the outcome to ensure I do not miss the legal deadline."*

16. I find that the claimant did genuinely, but wrongly, believe as at this date that the deadline to submit a claim relating to (or ending with) his dismissal was on 23rd March 2025, being three months after the date that the ACAS certificate had been issued. That is consistent with the claimant's email on 11th March, also to Mr. Gaskin, in which he told Mr. Gaskin that in fact the 20th March wasn't suitable because the claimant's union representative wasn't available. The claimant again stated:

"*my legal deadline to submit an ET1 is 23rd March."*

17. There would have been no reason for the claimant to say this if that hadn't been his genuine belief. At the time he sent these emails he was still in time to bring his claim, with the deadline actually due to expire on 13th March.

18. When asked by me how he came up with 23rd March as being the relevant date, the claimant told me that "*in all the confusion and stress that was going on and stress at PTSD – it came into my head – I was given ACAS certificate and my thought was 3 months less a day from the ACAS certificate."* In fact, the 23rd March would have been exactly three months from the date of the ACAS certificate.

19. The claimant did not suggest that he had asked anyone about the deadline and been told that it was 23rd March. Instead, I find that he had made an assumption, the accuracy of which he did not then check, that he had three months from the date of the ACAS certificate. Had the claimant conducted an internet search he would have been able to identify that this was wrong.

20. The claimant points out that Mr. Gaskin did not correct him when he suggested in his email on 7th March that the deadline was 23rd March, but Mr. Gaskin was not a lawyer and there is no evidence before me that Mr. Gaskin had been provided with a copy of the ACAS certificate or that he could or should have known of the claimant's error. I did not accept that the respondent could be held responsible for the error.

21. On 20th March 2025 the claimant presented his claim to the Employment Tribunal. I find as a fact that the reason that he presented it on this date, rather than by the earlier date of 13th March, was that he had wrongly assumed that the deadline was 23rd March, i.e., three months from the date of the ACAS certificate.

22. I have already said that the claimant in answer to my question about why he had thought the deadline for bringing a claim was 23rd March 2025 told me about confusion, stress going on and PTSD. In his submission on 24th June 2025 the claimant also suggested that the reason he had not presented his claim until 20th March was that between December 2024 and March 2025 he had experienced acute mental health challenges, including suicidal ideation which had significantly impaired his ability to manage procedural deadlines. The claimant told me he was on four types of medication.

23. Whilst I accept that the claimant did have a mental health condition and that he was taking medication, I found that was not the reason why he did not present a claim by 13th March. Nor did it prevent him from being able to check the time limit that applied to Employment Tribunal claims. I found this because:

    23.1 The claimant had been required by Employment Judge Perry in his notice of hearing to attach any medical evidence on which he relied. The medical evidence provided by the claimant did not say that during the relevant period (1 November 2024 to 13 March 2025) the claimant's mental health was such that it wasn't reasonably feasible for him to present a claim in time.

23.2 There was a letter dated 25 June 2025 from Dr. George, Consultant Locum Psychiatrist. This said that the claimant "*is under the care of the Bromsgrove NMHT. He is on medication to help alleviate his symptoms and is reviewed in the outpatient clinic regularly"* and that he "*is formally diagnosed with Post-Traumatic Stress Disorder and Mixed Anxiety & Depressive Disorder."* It said that the claimant "*has an allocated Mental Health Practitioner to help support his ongoing recovery in the community. The nature of his condition is chronic and relapsing. He is likely to remain under psychiatric care for the foreseeable future."* This did not specifically deal with the period between 1 November 2024 and 13 March 2025 and although one can infer that this had been the position with the claimant's health for some time, this letter did not say that the claimant's health meant that it was not reasonably feasible for him to present a claim between 1 November 2024 and 13 March 2025, or meant that he could not carry out internet research (for example on Employment Tribunal time limits), or that he was unable to understand information that he did research during that period.

23.3 There was also an undated letter from an Urgent Manager at Op Courage, the Veterans Mental Health and Wellbeing Centre. This stated that the claimant had been referred in October **2023** for an assessment of military related trauma. The referral had stated that the claimant was suffering from PTSD related issues from his time serving in the military, and that treatment aims were to refer the claimant for therapy to deal with PTSD related issues. It did say that "*unfortunately this has been on hold as Will has been in a crisis period",* but it did not say that when the "crisis" period was, or what that involved. It went on to say that the claimant had actively engaged with the team, worked hard to implement coping techniques to manage his emotions, and that the plan was that once everything had stabilised he would be able to access the therapy he needs.

23.4 Finally, there was a discharge letter in the bundle dated 15 September 2025, showing that the claimant had been attended by

an ambulance on that date due to chest pain. This didn't help me with the question of how the claimant was during the period between 31 October 2024 and 13 March 2025, or in particular how he was during the latter part of that period.

23.5 Against the limitations of this medical evidence, there was evidence that the claimant was able, during the relevant period, to engage in correspondence, to advocate for himself, and to work as a Security Analyst. Overall, the evidence did not support a finding that the reason that the claimant had not presented a claim by 13 March was his mental health. In particular:

23.5.1 The claimant was able to submit an appeal against his dismissal, notify ACAS on 11 November 2024, and attend an appeal hearing on 4 December 2024.

23.5.2 Whilst the claimant said in evidence that his mental health had been worse after Christmas, and he told me he was under more pressure because he did not have a job, by 2 February 2025 the claimant had started new work as a Security Analyst. The claimant told me that this work involved intelligence analysis, open-source intelligence for a security company. Although the claimant told me that he was not working full-time at that point, and he was working on a self-employed basis, the claimant was able to secure and undertake work in intelligence analysis at that time. This was over a month before the deadline for submitting an Employment Tribunal claim.

23.5.3 On 7 March 2025 the claimant was able to send a detailed email to Mr. Gaskin confirming he could attend a meeting on 20 March. Although on 11 March 2025 he suggested that date was not suitable, he did not suggest that had anything to do with his own health, rather it was due to his representative's availability.

23.5.4 Although in the email of 11 March 2025 the claimant did refer to "*not being able to commit to any other date that week* (i.e. the week commencing 17 March) *due to medical appointments and childcare responsibilities"* that does not explain why he hadn't presented a claim by 13 March 2025.

24. In his submission sent on 30 June 2025 the claimant said that raising two daughters alone whilst facing psychological strain (which he alleges was caused by the respondent's treatment of him) impaired his ability to launch legal proceedings concurrently, but for reasons already explained I do not find that was the case or that it was the reason the claimant why he did not present his claim by 13 March 2025. I find that the reason why the claimant did not present his claim in time was because he had wrongly assumed that the deadline was the 23 March rather than 13 March. That was an error.

25. I find that the claimant could and should have checked that his understanding was correct. I find that his mental health did not mean that it was not reasonably feasible for him to check the correct time limit, or to bring his complaint in time.

26. The claimant also relied on what he described as a reasonable expectation that internal processes should be exhausted before escalating a case to the Tribunal. However, it is clear from the claimant's emails to Mr. Gaskin that the claimant was aware that Tribunal deadlines needed to be complied with even if an appeal was outstanding, and indeed he did not wait for the appeal to be determined before he brought his claim on 20 March 2025. I do not find that the ongoing appeal process was the reason why the claimant did not present his claim by 13 March 2025.

27. The claimant also suggested that the respondent had obstructed his ability to prepare his claim by obstructing his SAR request, but I do not find that was the explanation for him not presenting a claim until 20 March 2025 because he was able to present a very detailed claim before he had received an outcome to his SAR.

28. In addition to the matters referred to above, in his witness statement the claimant made reference to his car having broken down and being in the garage with a difficult to diagnose problem for approximately three months. No supporting evidence was provided, and given that the claim form was presented online, I find these issues do not explain why the claim form was not presented until 20 March 2025.

29. On 18 June 2025, the respondent submitted a response in which it said the claims had all been brought out of time.

30. On 24 June 2025 the claimant submitted a response in which he accepted that his claim was "*slightly outside the standard limitation period when calculated rigidly"* but asked that his claim be allowed to proceed.

31. On 7 July 2025, the final appeal hearing took place.

32. On 13 August 2025, the claimant made an application to amend his claim (which application was dealt with on the first day of the preliminary hearing).

SUBMISSIONS

33. I considered both parties' written Skeleton Arguments and their oral submissions. What is set out here is a summary of those arguments, rather than a word for word record.

Claimant

34. In summary, the claimant submitted that:

    34.1 The delay had not been due to laziness or a disregard for the process. The delay of seven days would not prejudice the respondent. He made an honest mistake whilst navigating severe mental health challenges. The respondent's challenge to his PTSD (in that they had not conceded that the claimant was a disabled person at the material time) was bizarre. The respondent had not lived through warzones. There was procedural confusion and an ongoing internal appeals process that the claimant in good faith expected to resolve matters. During the period between December and March he had been under Op Courage, the letter referred to

October 2023 but he hadn't discontinued until April 2025. He had been prescribed four types of medication – he thought he had provided enough medical evidence.

34.2 He was also raising two daughters and continues to do so. He was working without proper support and trying to stay afloat.

34.3 He contacted ACAS in time and obtained a certificate and submitted his claim form in March thinking he was in time. He had emailed Mr. Gaskin twice under the mistaken belief that 23 March was the deadline and that hadn't been challenged by Mr. Gaskin. Mr. Gaskin had HR support. He submitted his claim three days before he thought the deadline expired.

34.4 The delay in his opinion was caused by the ongoing delayed appeal process that he thought had to be concluded before the Tribunal.

34.5 There were undisclosed documents, the SAR wasn't complied with until after his claim form. He had no legal help and mistakenly believed the process would align with ACAS.

34.6 The respondent's own attacks on the timing of his claim underlined what the claimant has been saying all alone. He has been trying to comply under difficult, exhausting processes. His case raises serious public interest concerns about how veterans are handled and breaches of the Armed Forces covenant, and about accidents being covered up. The case was about fairness, justice and truth and the respondent's conduct showed a pattern of avoidance and suppression.

Respondent

35. In summary, the respondent submitted that:

35.1 The claimant had raised for the first time at the preliminary hearing the suggestion that he had been under a misapprehension as to when the time limit expired. It was for the claimant to prove that. The fact he had only raised it at the preliminary hearing was not evidence of fact that he definitely thought that at the time he made the claim. The claimant was admirably on top of the law now, and seemed to be in his claim form.

35.2 The onus was on the claimant to prove that he had issues that meant it was not *reasonably feasible* to bring the claim in time. **Lowri-Beck** discussed what was meant by reasonable feasibility. The claimant had talked about mental health issues. Really the question was whether the claimant could have brought the claim in time, and he could. There was no evidence that he could not.

35.3 As to the email to Mr. Gaskin, Mr. Gaskin would not know when the ACAS certificate had been issued.

35.4 There was no medical evidence to support the claimant's claim that he could not present his claim in time. The relevant period was not October 2023 when the support letter talks about him being referred. The relevant period was 1 November 2024 to 20 March 2025. The discharge letter from September 2025 talking about potential heart issues and chest pain was not enough. The undated letter talking about the claimant being in a crisis period only referred to October 2023. The claimant had been ordered to lodge a numbered witness statement and should have done so, and making what were essentially submissions was not enough to show it was not reasonably feasible.

LAW

The "reasonably practicable" test

36. The time limit for bringing a claim of unfair dismissal (including automatically unfair dismissal) is set out at Section 111 of the Employment Rights Act **(ERA**) 1996. In so far as relevant, that provides:

(2) …an employment tribunal shall not consider a complaint under this section unless it is presented to the tribunal –

(a) before the end of the period of three months beginning with the effective date of termination, or

(b) within such further period as the tribunal considers reasonable in a case where it is satisfied that it was not reasonably practicable for the complaint to be presented before the end of that period of three months.

37. Section 207B provides for an extension of time to facilitate ACAS early conciliation. Day A is the day on which the claimant complied with the requirement to notify ACAS, and Day B is the date the claimant received (or is treated as having received) the ACAS certificate. For the purposes of calculating time limits, the period beginning with the day after Day A and ending on Day B is not to be counted. If a time limit set by a relevant provision would (if not extended by Section 207B (4)) expire during the period beginning with Day A and ending one month after Day B, the time limit expires instead at the end of that period.

38. "Reasonably practicable" means "reasonably feasible" (**Palmer and anor v Southend on Sea Borough Council** [1984] ICR 372).

39. In **Porter v Bandridge Limited** [1978] ICR 943, Waller LJ held that the onus is on the claimant to prove that it was not reasonably practicable to present the claim within the time limit.

40. Ignorance of the right to claim may make it not reasonably practicable to present a claim in time, but only where the claimant's ignorance is itself reasonable. The tribunal must consider what the claimant's opportunities were for finding out her rights, whether he took them, and if not, why not? Was he misled or deceived? (**Dedman v British Building and Engineering Appliances Limited** [1974] ICR 53, Scarman LJ).

41. In **Schultz v Esso Petroleum Ltd** [1999] IRLR 488, the Court of Appeal identified that when asking whether it is reasonably practicable to present a claim in time, the overall limitation period is to be considered, but attention will in the ordinary way focus upon the closing part, rather than the early stages.

42. In **Cygnet Behavioural Health Ltd v Britton** [2022] IRLR 198, the EAT held that a person who is considering bringing a claim of unfair dismissal is expected to appraise themselves of the time limits that apply; it is their responsibility to do so. At paragraph 56, Cavanagh J commented that:

"*it would be the work of a moment to ask somebody about time limits or to ask a search engine."*

43. In **Bodha (Vishnudut) v Hampshire Area Health Authority** [1982] ICR 2022, Browne -Wilkinson J said (in a passage approved by the Court of Appeal in **Palmer**):

"There may be cases where the special facts (additional to the bare fact that there is an internal appeal pending) may persuade an [employment] tribunal, as a question of fact, that it was not reasonably practicable to complain to the….tribunal within the time limit. But we do not think that the mere fact of a pending internal appeal, by itself, is sufficient to justify a finding of fact that it was not "reasonably practicable" to present a complaint to the….tribunal."

44. In **Lowri Beck Services Limited v Patrick Brophy** [2019] EWCA Civ 2490, Lord Justice Underhill summarised the legal principles relevant to the test of reasonable practicability (at para 12):

"*(1) The test should be given "a liberal interpretation in favour of the employee" (**Marks and Spencer plc v Williams–Ryan** [2005] EWCA Civ 470 which reaffirms the older case law going back to **Dedman v British Building and Engineering Appliances Ltd** [1974] ICR 32).*

*(2) The statutory language is not to be taken as referring only to physical impracticability and for that reason might be paraphrased as to whether it was "reasonably feasible" for the claimant to present his or her claim in time: see **Palmer and Saunders v Southend-on-Sea Borough Council** [1984] IRLR 119.*

*(3) If an employee misses the time limit because he or she is ignorant about the existence of a time limit, or mistaken about when it expires in their case, the question is whether that ignorance or mistake is reasonable. If it is, then it will have been reasonably practicable for them to bring the claim in time (see **Wall's Meat Co Ltd v Khan** [1979] ICR 52); but it is important to note that in assessing whether ignorance or mistake are reasonable it is necessary to take into account any enquiries which the claimant or their adviser should have made. (4) If the employee retains a skilled adviser, any unreasonable ignorance or mistake on the part of the adviser is attributed to the employee (Dedman).*

(5) The test of reasonable practicability is one of fact and not of law (Palmer)."

45. I was also referred to the decision of the Employment Appeal Tribunal in **Cross v NHS Somerset Clinical Commissioning Group** [2024] EAT 20. That was a case in which the employment tribunal found that the claimant had genuinely but mistakenly believed, following a telephone conversation with an officer from ACAS, that she needed to await the outcome of her grievance before starting any tribunal proceedings. The Employment Appeal Tribunal found that in that case the Employment Judge had erred in his consideration of whether the claimant's mistaken belief had been reasonable. At paragraphs 47 and 48 of the Judgment, Ms. Sarah Crowther KC held that the requirement that the "reasonably practicable" test be given a liberal interpretation in favour of the employee (as established in **Dedman**) remains good law. This does not mean that there is a general duty on the tribunal to be liberal in its application of the principles of Section 111 (2) to claimants generally and at large. Time limits are strict in the employment tribunal, and exceptions have to be properly construed and applied by reference to the evidence, and without reference to more general considerations of fairness or equity.

46. If the claimant proves that it was not reasonably practicable to present the claim in time, the tribunal must then decide whether the claim was submitted within such further period as was reasonable. That second question requires an objective consideration of the factors causing the delay and what period should reasonably be allowed in those circumstances for proceedings to be instituted, having regard to the strong public interest in claims being brought promptly (**Cullinane v Balfour Beatty Engineering Services Ltd** UKEAT/0537/10, paragraph 16).

CONCLUSIONS

Unfair dismissal

Were the complaints of unfair dismissal presented out of time?

47. The effective date of termination was 31 October 2024. The claimant notified ACAS on 11 November 2024, so that was "Day A" for the purposes of S.207B. The certificate was issued on 23 December 2024, so that was day B. The relevant period that has to be disregarded for the purposes of calculating time limits is 42 days. Absent any extension of time, the time limit would have expired on 30 January 2025, more than one month after Day B. Adding 42 days onto 30 January 2025 would take the time limit to 13 March 2025. The complaints of unfair dismissal and automatically unfair dismissal were not presented until 20 March and so were presented seven days out of time.

Was it reasonably practicable for the claimant to have presented his complaints by 13 March?

48. The test of "reasonably practicable" is "one that should be given a liberal interpretation in favour of the employee" (**Dedman,** **Lowri-Beck** and **Marks & Spencer Plc v Williams-Ryan**). As discussed in the **Cross** case, this does not mean that there is a general duty on the tribunal to be liberal in its application of the principles of Section 111 (2) to claimants generally and at large. Time limits are strict in the employment tribunal, and exceptions have to be properly construed and applied by reference to the evidence, and without reference to more general considerations of fairness or equity. The Tribunal has to consider whether it was "reasonably practicable" in the sense of "reasonably feasible" for the claimant to have brought his complaints in time.

49. The first thing I had to do was to reach a conclusion as to why the claimant had failed to comply with the deadline of 13 March 2025. For the reasons I have explained in the findings of fact section, I found that was because the claimant had wrongly assumed that the time limit was three months from the date of the ACAS certificate, so 23 March 2025.

50. I then had to consider whether the claimant's ignorance of the correct deadline was reasonable. I concluded that it was not.

51. The facts of this case were different to those in, for example, the case of **Cross**. In **Cross**, the claimant had relied upon advice given to her by ACAS

that she should await the internal process before presenting a claim. The reason for the claimant in **Cross** having missed the time limit was that she had relied upon that advice she had been given. In this case, the claimant told me that he "*had in his head"* the deadline was three months from the date of the ACAS certificate. This was not a case in which the claimant said that he had taken advice from someone that he reasonably expected to know about time limits had relied upon that advice. It was not reasonable for the claimant not to check whether his belief that he had three months from the ACAS certificate was correct. As discussed in the **Cavanagh** case, "*it would be the work of a moment to ask somebody about time limits or to ask a search engine."*

52. For the reasons I have explained in my findings of fact section, I did not find that the claimant's mental health or the fact that there was an ongoing appeal was the cause of the failure to present the claim by 13 March. Nor did I find that the claimant's mental health prevented him from being able to carry out a google search that would have revealed the correct deadline or that it meant that it was reasonable for him not to check the time limit. The medical evidence that was provided by the claimant did not say that during the relevant period the claimant was not well enough to present a claim, or to research time limits or to understand any information he researched. The claimant had access to the internet from dismissal until 20 March 2025. He was able to contact ACAS in December, to engage in the disciplinary appeal hearing, to work as a security analyst from 2 February 2025, and to engage in correspondence with Mr. Gaskin on 7 and 11 March 2025.

53. For reasons I have explained in my findings of fact section, I did not find that the SAR or car issues were the reason why the claimant did not present his claim by 13 March.

54. In those circumstances, I concluded that it was reasonably practicable, in the sense of reasonably feasible, for the claimant to have presented his claims in time.

55. It follows that the Tribunal has no power to hear the complaints for unfair dismissal under Section 98 and 111 of the ERA 1996 or automatically unfair

dismissal under Sections 103A and 111 of the ERA 1996. Those claims were therefore dismissed because the Tribunal had no power to hear them.

Approved by:

Employment Judge C Knowles

18 November 2025