

**DECISION OF THE CERTIFICATION OFFICER ON AN APPLICATION UNDER
ARTICLE 22 OF THE TRADE UNION AND LABOUR RELATIONS (NORTHERN
IRELAND) ORDER 1995 (THE 1995 ORDER)**

**IN A MATTER OF COMPLAINTS MADE AGAINST THE NORTHERN IRELAND
PUBLIC SERVICE ALLIANCE (NIPSA)**

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APPLICANT: MR J WELSH

Date of hearing: 20 September 2001
Date of decision: 25 October 2001

DECISION

- 1.1 Under Article 22(1) of the Trade Union and Labour Relations (Northern Ireland) Order 1995 (“the 1995 Order”) any person having sufficient interest who claims that his or her trade union has failed to comply with any of the provisions of Part III of the 1995 Order concerning the conduct of elections may apply to me for a declaration to that effect.**
- 1.2 Whether I make, or refuse to make, the declaration sought, I am required to give the member and the union the opportunity to be heard, and to give, in writing, the reasons for my decision. If I make a declaration, I am required to specify the provisions with which the trade union has failed to comply. Where I make the declaration sought, I may also make such order for remedying the breach unless I consider that to do so would be inappropriate.**

1.3 On 8 March 2001 I received an application from Mr Welsh, a member of the Northern Ireland Public Service Alliance (NIPSA), under Article 90A of the above Order, in which he claimed that NIPSA's election regulations had been broken in respect of the 2001 general council election. He alleged that there had been interference in the ballot caused by the widespread, organised circulation of a leaflet (complaint 1). The leaflet, using NIPSA's logo, was entitled "Time for Change" and carried a sub-heading "RECLAIM YOUR UNION". Mr Welsh said the leaflet claimed, inter alia, that the general council was "out of touch with members"; it listed 16 candidates, naming their employers and their trade union branch numbers, together with the message to "vote for these candidates only". Mr Welsh cited rule 17 of those regulations: "every member will be allowed to vote without interference or constraint" Mr Welsh also complained that the scrutineer had failed to carry out his functions properly (complaint 2). Mr Welsh said he had raised his concerns with the returning officer (the scrutineer), on a number of occasions, and had failed to get any response.

1.4 Following discussions with my office, Mr Welsh confirmed that he believed that Article 17(3) of the 1995 Order had been breached. That article requires that every person entitled to vote at the election must be allowed to vote without interference from, or constraint imposed by, the union or any of its members, officials or employees.

1.5 I attempted to investigate Mr Welsh's complaints in correspondence with the union, however, whilst NIPSA provided me with factual information by way of copy

documents, its general secretary Mr Mc Cusker, advised me by letter of 15 May 2001 that he “was not authorised to comment” on Mr Welsh’s allegations.

1.6 Mr Welsh wrote to me on the 22 May and again on the 2 June 2001 saying, inter alia, that; the scrutineer accepted there was potential for confusion in the ballot as a result of the circulation of the leaflet; he knew of other members’ complaints about the leaflet, and he looked forward to the opportunity to make his case to me. Mr Welsh also referred to motion number 59, which, he said was debated and carried unanimously at NIPSA’s annual conference in June 2001; he said that statements made in the debate supported his complaint of interference in the ballot. He asked me to obtain a copy of the transcript of the debate, or extracts of it, from NIPSA, as he had no means to do so.

1.7 On 10 August 2001 Mr Mc Cusker wrote to me, on behalf of NIPSA’s general purposes committee, for copies of correspondence between Mr Welsh and the scrutineer, and between Mr Welsh and my office, so that it “can prepare its comments on the allegations”. My office provided him with the documents he requested. He also advised “I have..... been asked by the committee to point out (to you) that my letter of 15 May 2001 was solely in response to your request for information and is not to be taken as the definitive response of NIPSA”.

1.8 I therefore arranged a formal hearing to hear argument on the complaints. Prior to it the parties were provided with a set of papers and asked to agree that these were the relevant documents and to let my office know if they intended to submit additional papers. Mr Welsh confirmed his agreement. No reply was received from the union. Neither party submitted additional papers.

1.9 The hearing was held on the 20 September 2001. At the start of the hearing I outlined the matters that were before me i.e., the complaints of interference in the election and the failure of the scrutineer to carry out his functions properly. The applicant, Mr Welsh attended the hearing and represented himself. The union was represented by Ms O'Neill of Mc Cartan, Turkington and Breen, solicitors. Mr Campbell, NIPSA's president and Mr Mc Cusker general secretary attended, and the latter also gave evidence.

1.10 For the reasons which follow, I refuse to make a declaration in relation to the complaint of interference (complaint 1). Also, for reasons which follow, I have decided to make a declaration and to issue an order in relation to the scrutineer's report in respect of his failure to carry out his functions properly (complaint 2).

1.11 I am aware that NIPSA will soon begin preparations for its annual general council election for 2002. Accordingly, I invited the union and Mr Welsh to meet with my office to discuss the timing of the order to minimise confusion in relation to the 2002 election. Mr Welsh accepted my invitation, however, the union declined. In the circumstances I decided not to proceed with the discussion, and advised Mr Welsh and the union accordingly.

DECLARATION

1.12 For the reasons which follow:

"I declare that the scrutineer's report prepared following the election ballot for the general council of the Northern Ireland Public Service Alliance in 2001 breaches Article 19 of the

1995 Order as it referred to legislative provisions which do not extend to Northern Ireland, and accordingly was not properly made.”

ORDER

1.13 Also for the reasons which follow:

“I order that the Northern Ireland Public Service Alliance have the scrutineer’s report on the election of its general council in 2001, prepared in accordance with Article 19 of the 1995 Order and issued to its members together with a letter explaining why the initial report issued by the scrutineer on 9 February 2001 did not comply with Northern Ireland law. This shall be done before 23 November 2001”.

Requirements of the Legislation

1.14 The relevant statutory requirements of Part III of the 1995 Order, and the regulations prepared by the Northern Ireland Public Service Alliance for the 2001 election, in respect of the complaint, are as follows:

“Appointment of independent scrutineer

15. -(1) The trade union shall, before the election is held, appoint a qualified independent person (“the scrutineer”) to carry out –

(a) the functions in relation to the election which are required under this Article to be contained in his appointment; and

(b) such additional functions in relation to the election as may be specified in his appointment.

(2)...

(3) The scrutineer’s appointment shall require him –

(a) to be the person who supervises the production of the voting papers and (unless he is appointed under Article 18 to undertake the distribution of the voting papers) their distribution and to whom the voting papers are returned by those voting...

(b)...

(c) to take such steps as appear to him to be appropriate for the purpose of enabling him to make his report (see Article 19)...

(d)...(e)

Voting

17. -(1) ... (2)

(3) Every person who is entitled to vote at the election must -

(a) be allowed to vote without interference from, or constraint imposed by, the union or any of its members, officials or employees...

(b) ...

Counting of votes etc. by independent person

18.-(1)...(5)

(6) The trade union-

(a) shall ensure that a person appointed under this Article duly carries out his functions and that there is no interference with his carrying out of those functions which would make it reasonable for any person to call into question the independence of the person appointed in relation to the union,

(b)...(c)

Scrutineer's report

19.-(1) The scrutineer's report on the election shall state-

(a)...(d)

3 the name of the person (or of each of the persons) appointed under Article 18 or, if no person was so appointed, that fact.

(3) The report shall also state-

(a) whether the scrutineer is satisfied –

(a) that there are no reasonable grounds for believing that there was any contravention of a requirement imposed by or under any statutory provision in relation to the election.”

Relevant NIPSA rules and regulations

1.15 The relevant rules and regulations prepared by the NIPSA for the 2001 election and motion 59 debated at NIPSA annual conference June 2001, in respect of the complaint, are as follows:

General Council Election Regulations for 2001

“ General

1. These regulations have been prepared by the General Council under rule 6.31 of the union. Subject to any amendments which may be issued, the regulations will govern the conduct of the 2001 General Council elections. They are binding on all members.

Voting Arrangements

17. Entitlement to vote will be accorded equally to all ordinary members ... Every member will be allowed to vote without interference or constraint ...

Returning Officer

22. The Returning Officer (and Independent Scrutineer under the Trade Union and Labour Relations (NI) Order 1995) for the elections will be Electoral reform Services, Independence House, 33 Clarendon Road, London N8 0NW.

26. The Returning Officer will make a report to the union as required under the Trade Union and Labour Relations (NI) Order 1995, including a statement of the result of the elections...

Complaints Concerning General Council Elections

31. Any complaint as to an alleged breach of the rules relating to General Council elections shall be made in writing to the Returning Officer. If in the opinion of the Returning Officer there has been a breach of these rules, the Returning Officer shall consult the President. The Returning Officer shall then decide whether the election shall proceed, whether an election shall be declared void or any nominee disqualified, and take such decisions as may seem proper to him or her.

Motion No 59 (Branch 21) [Debated at NIPSA Annual Conference June 2001].

Conference believes that every member is entitled to vote in the election for the General Council, free from pressure and misinformation. This year a document bearing the official NIPSA logo was circulated, advising members who they should vote for. The General Council is instructed to insure that, prior to future elections, members are informed that the union will not be circulating any lists and that the only official list will be the ballot paper (which provides space for candidates to set out their platform)."

Complaint 1 alleging that the NIPSA general council election ballot held between 26 January and 9 February 2001 was interfered with and, accordingly, that Article 17(3) (a) of the 1995 Order had been breached.

The Applicant's case

2.1 Mr Welsh wrote to me seeking a declaration that the NIPSA general council election ballot held between 26 January and 9 February 2001 was interfered with and, accordingly, that Article 17(3)(a) of the 1995 Order had been breached. At hearing, Mr Welsh said that he has been a NIPSA member for 28 years and has held senior positions in the union in that time, including vice-president and president. He is its current vice-president. Given his long and close involvement with the union he said he was reluctant to bring this case. He claimed that there was no means for him to complain to his union in this case.

2.2 Mr Welsh argued that the widespread, organised circulation of a leaflet caused interference in the ballot. The leaflet using NIPSA's logo was entitled "Time for Change" and carried a sub-heading "RECLAIM YOUR UNION". Mr Welsh said the leaflet claimed, inter alia, that the general council was "out of touch with members"; it listed 16 candidates, naming their employers, giving their trade union branch numbers and at the foot of the page said "vote for these candidates only". He told me 15,000 leaflets had been circulated in workplaces by an organised group of candidates. He referred me to a newspaper article written by Mr Mulholland, a candidate in the election who claimed widespread distribution of "15,000 leaflets in the civil and public service workplaces throughout the North". Mr Welsh said circulation was based on 2 leaflets for every 5 union members and, to demonstrate the influence he considers the leaflet had, he said that 12 of the 16 people named in the leaflet were elected to the 25 member executive, with 3 of the remaining 4 named at 1st, 4th and 5th reserve.

2.3 Mr Welsh also argued that the use of NIPSA's logo contributed to interference, chiefly because members would not read the leaflet closely. He suggested that

members were more likely to glance at the NIPSA logo, assume the leaflet to be an “official” union instruction and act accordingly. He said a precedent has existed in NIPSA, requiring advance permission from the union for the use of its logo; such permission had not been sought nor given in this case.

2.4 He drew my attention to a letter from the independent scrutineer to Mr Mc Cusker (2 February 2001) in which the scrutineer advised, “It is reasonable to believe that the manner of the presentation of the leaflet could have confused some members”. The scrutineer continued: “An appropriate response would be to circulate to branches a letter stating that the leaflet is not an official NIPSA publication. It would be inappropriate to comment further upon the content of the leaflet, as NIPSA rules do not forbid members seeking support through the circulation of literature such as this”. Mr Welsh said that this correspondence arose after two other members of NIPSA raised concerns in late January 2001 with the general secretary about the leaflet’s contents. The general secretary sought the scrutineer’s guidance. Following that advice, Mr Mc Cusker wrote to members on the 7 February 2001 to say that the leaflet was not an official publication. The closing date for the election was 9 February 2001.

2.5 Mr Welsh said that, before applying to me, he had complained to the union’s general secretary (23 January 2001) and on three separate occasions to the scrutineer; the 9, 16 and 28 February 2001. After making his application to me, he complained again to the scrutineer (19 April 2001). Mr Welsh said he had not received any replies.

2.6 Mr Welsh stressed that when the scrutineer wrote to Mr Mc Cusker in early February 2001 he could not have known the extent of the leaflet’s publication. He

said that Mr Mc Cusker's advisory letter to members was too little too late as it only issued two days before the ballot closed (7 February 2001). He added that most people would, like him, complete the ballot papers almost immediately after receipt (late January 2001 in this case). Moreover, as the deadline for the return of ballot papers was 2.00p.m. on the 9 February 2001, to a London address, most, if not all members would have returned papers before receiving Mr Mc Cusker's advice.

2.7 Mr Welsh addressed me on the remedy he sought. In relation to his complaint of interference, he said he did not want the election to be re – run as he felt it would not be in the best interests of the union, given that another election was due shortly. He asked me to declare that those who circulated the leaflet and used NIPSA's logo in their campaign should not have done so, and declare that their actions and tactics constituted interference.

2.8 During cross-examination on behalf of NIPSA, the union's solicitor suggested to Mr Welsh that there were two issues. (1) the scrutineer was inefficient in the way he dealt with Mr Welsh's complaints, and (2) the use of the logo was unlawful and influenced people. The union's solicitor said she did not wish to ask Mr Welsh any questions on the first issue. On the second she suggested it would be hard to assess whether or not the leaflet did confuse candidates. Mr Welsh agreed that the leaflet criticised the then general council and NIPSA officials. She asked if he accepted that a reasonable understanding of the leaflet would be that it did not emanate from either NIPSA officials, or the then general council, because it criticises who they are and what they are doing. On this basis she also asserted "confusion must be limited".

2.9 Mr Welsh said he understood that the leaflet did not come from official union sources, but added that people had said to him that they had received a list of the people the union wanted them to vote for. He went on to say that it is regrettably the fact that not all members read all circulars carefully, and that they quite often looked at the title, and what they were being asked to do. He said that was why he made the initial complaint to the general secretary.

The union's response

2.10 On behalf of NIPSA, its solicitor said the only issue I had to consider was whether or not the use of the NIPSA logo on the circular unduly influenced members voting at the election. She argued it did not, but claimed that the use of the logo was wrong; furthermore she claimed that as NIPSA had not given prior consent, its use was unlawful (my emphasis).

2.11 The union's solicitor said there was interference in the election (my emphasis). I quote from her evidence: "I think it's clear from the letter that Mr Mc Cusker circulated to the members that this was interference in the election (my emphasis)...that circular was not a NIPSA circular and. . . it should not have been circulated. But the question for the tribunal, as I've emphasised already and will re-emphasise now, is whether or not that circular caused undue influence on those who were voting. . . . The fact that Mr Mc Cusker issued a letter to the branch is an acknowledgement of that interference"(my emphasis).

2.12 Mr Mc Cusker confirmed he had learned of the leaflet's existence on 23 January 2001, when Mr Welsh brought it to his attention, however, he did not consider that Mr Welsh was making a complaint to him about the leaflet at that time. He said he

had an informal discussion with Mr Welsh and he told him of the procedure for making complaints to the scrutineer.

2.13 Mr Mc Cusker said he received complaints about the leaflet at the end of January 2001 from other NIPSA members. He wrote to the scrutineer, Mr Slater, immediately (1 February 2001) seeking guidance and suggesting issuing a circular to NIPSA branches to advise that the leaflet had no official standing. Although the scrutineer's reply was dated 2 February, Mr Mc Cusker said he did not receive the letter until 7 February, and then only by fax. On 8 February he got the written copy. Mr Slater confirmed that it was reasonable to believe the manner of the leaflet's presentation could have confused some members; he recommended a letter be sent to branches to say the leaflet was not an official NIPSA publication. Mr Mc Cusker followed the advice, again immediately, issuing the circular on 7 February 2001 – the same day he received the scrutineer's fax.

2.14 With regard to Mr Welsh's suggestion that some members may have been confused by the leaflet, Mr Mc Cusker said he felt that anyone reading it could not have been confused or left in any doubt that it could have come from the union.

2.15 The union's solicitor was asked if she had given any consideration to Article 17(3)(a) of the 1995 Order (every member will be allowed to vote without interference or constraint). She said that she did not see it as an issue.

2.16 In reply to Mr Welsh, the union's solicitor confirmed that NIPSA's view was that the use of its logo did not unduly influence members. Mr Welsh asked how this view could be upheld light of motion 59 being carried as a policy of the union at its June

2001 annual conference. Mr Mc Cusker explained that the motion expressed a number of facts e.g., members are entitled to vote free from pressure and mis-information, and that a document bearing NIPSA's logo advising members how to vote had been circulated. Mr Mc Cusker said the motion didn't go on to express any opinion about those facts.

2.17 Mr Welsh confirmed that he made his first complaint to the scrutineer on the day the ballot closed; by then, Mr Mc Cusker had already followed the advice given to him by the scrutineer. Also, during questioning, the union's solicitor conceded that, despite her earlier evidence to me to the contrary, there was nothing unlawful in the use of the NIPSA logo.

2.18 During the hearing Mr Welsh conceded that his initial letter to Mr Mc Cusker (23 January 2001) was not a complaint, rather it was to advise him about the leaflet which was in circulation. He admitted that he should have complained to the scrutineer on that date. He said he was aware of a circular letter (17 January 2001) from NIPSA, stating, "Individual ballot papers will be issued by the independent scrutineer who is responsible for all aspects of the election. If any member has any queries they should contact the independent scrutineer (not NIPSA)".

Reasons for my decision

2.19 Despite the fact that the union failed to address the legal issues at the heart of the complaint, and notwithstanding the fact that the union conceded interference in the ballot at hearing, I find that there was no interference in this ballot for the following reasons.

2.20 I consider that the phrase “without interference or constraint” relates to intimidation or other physical interference with the voter, to be distinguished from mere persuasion or influence. There already exists extensive case law on the subject of interference and, in this case, there is no evidence before me of such intimidation or other physical interference or constraint. Accordingly I refuse to make the declaration sought.

Complaint 2 about the scrutineer’s failure to carry out his functions properly.

The Applicant’s case

2.21 Mr Welsh said he understood the scrutineer’s duties in determining the result of the ballot, and reporting on its outcome. He said that the difficulties in relation to his complaint of interference were complicated by the scrutineer’s role. He drew my attention to Article 19(3) of the 1995 Order, which requires the scrutineer to prepare a report; the scrutineer clearly states in his report of 9 February 2001, that he was appointed under G.B legislation, which does not extend to Northern Ireland.

2.22 Mr Welsh cited from the report where the scrutineer said he was satisfied with a range of matters under G.B. law. Mr Welsh said that he did not know what these meant, and that as he had “no reference point to understand what the scrutineer was saying”, he was unable to determine from that report whether the scrutineer was satisfied that there were no reasonable grounds for believing there was any contravention of the statutory provisions.

2.23 Mr Welsh also felt the scrutineer’s report should have referred to the complaints he had received and how he dealt with them, particularly as the scrutineer had accepted

the possibility of confusion. Mr Welsh questioned the scrutineer's effectiveness and he expressed the view that he had failed to do his job.

2.24 Finally, Mr Welsh addressed me on the remedy he sought. In relation to the conduct of the scrutineer, he sought a declaration that the scrutineer must apply the proper and appropriate legislation in the conduct of the ballot.

The union's response

2.25 Mr Mc Cusker said the union is required to appoint a scrutineer and that the Government has a list of three or four officially approved scrutineers; one of these is Electoral Reform Services (ERS). He said the union's general council meets annually to make an appointment from the approved list; ERS was chosen for the 2001 council election. He said he was unhappy with a number of aspects of the scrutineer's performance, but despite this, he felt that there was nothing in that performance sufficient to set aside the result of the election.

2.26 He also said he was disappointed that the scrutineer did not reply to Mr Welsh's complaints, and that he had also expected the scrutineer to have referred to the complaints in his report, and give an assessment of those complaints.

2.27 In evidence, Mr Mc Cusker said the Government appoints scrutineers. I quote from his evidence: "the fact is the Government appoints these scrutineers not us, and we've a very limited choice in terms of who we go to for scrutineers, and I don't know what the remedy is if you are dissatisfied with a scrutineer appointed by the Government".

2.28 The solicitor was requested to address me on the contents of the scrutineer's report but declined. When asked to consider whether the scrutineer's report was lawful she replied it was not a matter for her to consider. Furthermore, she said she did not see it as an issue, nor did she think that NIPSA should either. When it was drawn to her attention that there are statutory requirements under the 1995 Order, relating to trade union elections; she replied that this was not the issue she came to the hearing to "debate", as she did not consider these to be relevant. The solicitor added that she felt that the legal context of the complaints (i.e. the statutory requirements under the 1995 Order) had been introduced as new matters.

2.29 When it was confirmed that I had expected to be addressed on the statutory requirements in relation to the two complaints before me the solicitor repeated her view that these were new issues and "were not part of our agenda".

2.30 In evidence, Mr Mc Cusker clarified some matters in regard to the election regulations prepared by NIPSA. He said that these were normally discussed in draft with the scrutineer to enable any potential difficulties or problems to be addressed. Mr Mc Cusker was asked if NIPSA took any steps to deal with the failure by the scrutineer to comply with paragraph 26 of its election regulations (i.e. to make his report to the union under Northern Ireland law). He confirmed that it had not.

Reasons for my decision

2.31 I agree with Mr Welsh when he says the scrutineer's report (which is distributed to some 38,000 members of NIPSA) must contain references to Northern Ireland legislation. The scrutineer's report did not refer to Northern Ireland legislation. His report cites 10 separate sections of G.B. law that do not extend to Northern Ireland.

I have sympathy with Mr Welsh when he said he had difficulty understanding the scrutineer's report as it was written, and when he said that he felt that he had "nowhere to go". I accept that NIPSA had taken adequate steps, through its election regulations, to ensure that the scrutineer was properly appointed under Northern Ireland legislation and that Mr Mc Cusker acted promptly and properly once he received complaints about the conduct of the ballot from concerned members.

- 2.32 However, this does not detract in any way from failings by NIPSA. The union ignored the requirements of its own election regulations by accepting the report prepared by the scrutineer, which contained only references to G.B. law. Similarly, this should not detract from failings by the scrutineer who wrongly issued his report using only references to G.B. legislation, which is not in force in this jurisdiction.

Observations

- 3.1 Article 55 of the 1995 Order allows me to make observations. I do so in this case.
- 3.2 I have to determine any complaint that falls within my statutory powers, I am required to make such enquiries that I deem fit and I am required to provide a hearing. As a general rule, unions and applicants are cooperative and I am grateful to them for this as it assists me in the speedy conclusion of my investigations.
- 3.3 In this case the responses I received from the union before the hearing did little to assist me. In seeking to arrange a date for the hearing my staff were initially advised by the union's general secretary that it might not attend nor be represented at the hearing; my staff only learned that the union would be represented shortly before

the hearing. Furthermore, after the hearing the union declined to discuss the timing of my order, despite the fact that the invitation was extended by my office to facilitate them and to minimise any confusion in regard to their 2002 election.

3.4 At the hearing I found the contribution by Mr Welsh helpful in my determination of his complaints. In contrast, the union failed to address the legal issues, which were the basis of the complaints brought by Mr Welsh. At the hearing I informed the union that I had expected to hear more legal argument from it on the complaints.

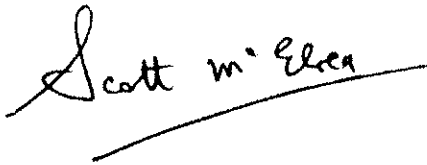
3.5 I felt it necessary to offer the union the opportunity of a recess or another hearing day to consider its position further. Both were declined. The union's solicitor stated that the reason she did not want more time to prepare legal argument was that it would incur more costs to her client. In the circumstances, I was left with no alternative but to base this decision on the law and on the evidence before me.

3.6 To the best of my knowledge this is the first case, since this office was established in 1992, where a union failed to cooperate fully with the Certification Officer. It is of course open to those of whom I make enquiries, to decide how they will cooperate.

3.7 I will now deal with Mr Mc Cusker's remarks regarding the appointment of scrutineers. The Government does not appoint scrutineers – that duty lies with the trade union. The statutory requirements are set out in the Trade Union Election and Ballots (Independent Scrutineer Qualifications) Order (Northern Ireland) 1992 (S.R. 1992 No. 241). The requirements are that the scrutineer must be a competent, independent and impartial person. The regulations say that a union may appoint as scrutineer a solicitor or firm of solicitors, or an accountant or firm of accountants or

any of the 3 nominated organisations specified in the order. Solicitors and accountants must, however, satisfy certain prescribed conditions, contained in the regulations, if they are to be appointed.

3.8 Finally, I believe that scrutineers should endeavour to be open and responsive to members who contact them. This will emphasise the scrutineer's independence, and experience suggests that a more positive approach in dealing with requests from members may save complaints later. I recognise that some members may try to exploit a more open stance by the scrutineer. It is my view that the scrutineer's first reaction should be to help, not to ignore members, raising concerns or making complaints.

A handwritten signature in black ink that reads "Scott m. Elrea". The signature is written in a cursive style and is underlined with a single horizontal line.

S Mc Elrea

Northern Ireland Certification Officer