

Response to the Suspensions in Rushcliffe CLP

September 2015 - June 2018

Peter Gates

*West Bridgford Branch Labour Party
Rushcliffe Constituency Labour Party*

*"This above all - to thine own self be true,
And it must follow, as the night the day,
Thou canst not then be false to any man."*

Polonius, Hamlet, Act 1 Scene 3

This **Response** to the charges laid against me contains all the documents I feel are relevant to my administrative suspension from the Labour Party and which are required to refute all of the allegations and the three charges in the **Charges Pack**. I can provide original documents of all the material included in this Response.

This Response consists of five main sections:

- **An Executive Summary (pps. 4 - 8)**
This section consists of a five page summary of my rebuttal of all three charges and which is provided in considerable detail in Section A.
- **Section A. Main Material (Sections 1 – 12, pps. 9 - 162)**
This section consists of the detailed rebuttal of all allegations made against me in the Charges Pack. This comprises all evidence, correspondence and exchanges that demonstrate all allegations to be without any substance.
- **Section B. Additional Material (Sections 13 - 26, pps. 163 – 260)**
*This section contains key documents that I rely upon in **Section A** – including minutes of Rushcliffe CLP and West Bridgford BLP meetings, transcripts, chronologies, plus longer documents and exchanges than those appearing in **Section A**.*
- **Section C. Witness Statements (Section 27, pps. 261 - 320)**
This section contains all 20 Witness Statements from Labour Party members who have knowledge and insight into the situations surrounding the three allegations made in the Charges Pack.
- **Section D. Documents from the Labour Party (Section 28, pps. 321 - 448)**
*This section contains two parts: My Subject Access Request (**Section 28.1**), and The Charges Pack (**Section 28.2**). The information I received from the Labour Party as a result of my Subject Access Request is appears to be merely a selective collection of information – but excluding all communication with myself. As such it would appear to be in breach of the Data Protection Act (1998). Secondly, the full Charges Pack is included for transparency and full disclosure for those who would not have received it otherwise.*

I want to thank all those very many Labour Party members in West Bridgford Branch Labour Party, Rushcliffe Constituency Labour Party, Party members in Nottingham City and Nottinghamshire, and those members around the country who have supported me and encouraged me during this very difficult time. Without you, and without my family, it would have been difficult to remain positive throughout the two years. You all know who you are; it is all of you who make the Labour Party such a powerful force for good in this country.



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Executive Summary

Due of the lack of clarity in the charges laid against me and my contention that the allegations are all without foundation or substance, this response will, of necessity, be considerable. That is because I will be providing evidence against all charges, evidence for which is absent from the Charges Pack (see **Section 28.2**). Therefore, this Response contains my reply as well as email communications, minutes and other documentation that demonstrate that the allegations against me are false and, consequently, that the charges are false as they have no grounds. However, in order to summarise the full response for easier reading, this **Executive Summary** itemises the evidence against all charges in a simpler form.

The main difficulty in putting this together is that there is no evidence appertaining to the three charges in the Charges Pack. In addition, nowhere is there any reference to which part(s) of the Bullying and Harassment Guidelines is being contravened. On the one hand, this simplifies matters since, without evidence, any allegation is surely without substance. However, the contributions herein, from two people in particular, include insinuations and smears against me which, whilst without any foundation, require me to respond to defend my reputation and my integrity.

The Introduction to the Charges Pack on page 1 contains a large number of inaccuracies which I have discussed in **Section 4.1**. It is surprising that no one felt it necessary to check the veracity and reliability of the information.

Charge 1

In the period leading up to January 2017, you are alleged to have acted in a bullying, intimidating and otherwise hostile manner towards a number of other members of the CLP including, but not limited to excessive correspondence in breach of the Labour Party's Bullying & Harassment policy. This behaviour continued after the expectations of the Party with regard to the conduct of individual members were raised with you.

1. Insofar as a charge of "acting in bullying, intimidating and otherwise hostile manner", there is not one single verifiable example in the Charges Pack. I contest this allegation completely, maintaining that my behaviour has been encouraging, professional and comradely throughout. No one has been able to provide me with a single verifiable example.
2. On the evidence in the Charges Pack, it appears that the sum total of complaints come ostensibly from two people. It is doubtful whether Liz Plant's comments constitute an allegation of "bullying, intimidating and acting in a hostile manner". Sandra Coker makes no identifiable allegations either. So, we are left with unsubstantiated allegations by just two people. I do wonder why - if my behaviour was so abusive, intimidatory and hostile - not one of the other 800+ Labour Party members in West Bridgford, or 1300+ Labour Party members in Rushcliffe ever noticed nor reported any such behaviour.
3. There are numerous examples throughout this Response of my dealings and interactions with members and officers of the Party, all of which demonstrate me to be professional, reasonable and polite.
4. Insofar as a charge of "excessive correspondence" is concerned, there is only brief duplicated email from me contained as evidence in the Charges Pack page 33-34. That email consisted of a request to place three items on the CLP General Committee ("GC") agenda - items which Andy Furlong identifies as those he felt needed to be discussed by the CLP (page 54 of the Charges Pack, and **Section 10.6** in this Response). There is no substance in this allegation, even though the frequency of correspondence is not stipulated in the Labour Party Rule Book.

5. Insofar as the comments from Liz Plant over three aspects of my management of the Branch are concerned (page 15, and pages 23-28 of the Charges Pack), I have provided clear evidence demonstrating that all three aspects were handled by me in an open, transparent, comradely and democratic way (**Sections 4.1 - 4.4**).
 - 5.1. Liz Plant is not actually making an allegation or complaint and none of the matters that she raises are contrary to the Labour Party Rule Book and should not form part of any charge against **Party Rule 2.1.8**. They are matters of procedure.
 - 5.2. I have considerable respect for Liz Plant as an excellent Chair of West Bridgford Branch and as my local councillor. I campaigned for her and with her wherever I could.
6. There are a number of allegations from Gary Edgerton and Elizabeth Edgerton ("Lizzie Edgerton") on pages 10-14, 19-22, 31-34, 40-41, 43-46, 63-63. These allegations are not backed up by validating evidence and so, cannot stand up to scrutiny. Some of these are:
 - 6.1. Conversations in a car or unspecified location.
 - 6.2. Events and conversations that never took place.
 - 6.3. Events that can in no way be construed as harassment - e.g. Being friendly, sitting next to Gary Edgerton.
 - 6.4. Actions that a forensic examination of the evidence can prove to be false.
 - 6.5. In this Response, I have been able to provide extensive evidence that demonstrates all of these allegations have no substance.
7. Sandra Coker lodges a "*formal complaint*" on page 18, but does not clarify that, and does not substantiate any of the allegations of "*misrepresentation ... of members of Rushcliffe CLP*" nor detail about which members this allegation concerns. I wonder if she has been misinformed. There is also no evidence of "*abusive behaviour at meetings*", and no such abusive behaviour is reported in the minutes of any meeting that I have attended. I contend that any allegation I was ever in any way abusive, either in meetings or outside, is false.
 - 7.1. Sandra claims that as a direct result of my behaviour she was "*standing down as women's officer for both the branch and the CLP*". The list of CLP officers circulated by Richard Crawley on 11th January 2016 included Sandra as Women's Officer. There is no record of Sandra standing down as either, and no election for replacements. Sandra also attended the 7th March meeting referred to in Charge 2, as a member of the EC (this is discussed in **Sections 4.5, 5.2** and **10.7**), presumably as CLP Women's Officer. This casts some doubt on her claim to her having been forced to stand down because of my behaviour.
 - 7.2. I have every respect for Sandra's work in the Party and specifically for her indefatigable work as Women's Officer. It is very regrettable that we found ourselves in some unfortunate and quite unnecessary dispute.
8. Some of the material in this pack does not in any way relate to me.
 - 8.1. Some material relates to John Walsh and should not be included or considered relevant.
 - 8.2. Pages 35 – 38 consist of anonymous letters circulated in Rushcliffe and I was one of the first to condemn such a practice. I do not understand how they found their way into the Charges Pack. If they were included in order to insinuate that they were sent by me, then that is entirely inappropriate.

Charge 2

On or around 7th March 2016, you are alleged to have attended a meeting arranged by the CLP EC and regional board to resolve historical complaints and arranged for a number of uninvited members to also attend who refused to leave the meeting which was subsequently abandoned

There is considerable material in this Response over what was fourteen minutes of a meeting. What this material identifies is a mishandled event characterised by a lack of information, and a failure to communicate effectively.

1. There is a lack of transparency over the re-establishment of meetings of the CLP EC in January 2016 (**Section 5.2**), which had been dormant since April 2015. The CLP GC was not informed of the re-establishment of EC meetings.
2. It transpired that the 7th March meeting was a meeting of an *Executive Committee* of Rushcliffe CLP, but no such body had met for almost a year, and no meetings of an EC had been reported to the CLP GC between March 2015 and March 2016. The meeting was not described as a meeting of the EC in the invitation to attend, which described it only as "a meeting of Rushcliffe CLP". Questions remain as to why the EC was shrouded in secrecy.
3. There is some evidence to suggest a coordinated sequence of events starting early January 2016, apparently to deliberately re-energise previous tensions which had by that time resolved themselves (**Section 5.3**).
4. There is a considerable lack of clarity over the purpose of the 7th March meeting:
 - 4.1. Members of the EC were not aware of the purpose of the 8:00pm meeting.
 - 4.2. In no communication over EC meetings was it ever said that any Rushcliffe meeting was closed to members. Previous EC meetings had been open, and a previous CLP Secretary (Steve Calvert) and an EC member (Jean Stansfield) had told three members (Linda Burdett, Brent Abbot and Zbyszek Luczynski) that the meetings were open.
 - 4.3. The minutes show that I had said that I would leave the meeting at around 8:25pm, immediately before Andy Furlong closed the meeting. This contradicts the claim that we disrupted the meeting.
5. There are considerable differences in the notes of the meeting from Andy Furlong (pages 54-56 of the Charges Pack) and the minutes of the meeting (pages 57-61). The detailed minutes show there was no disruption and that most of the observers sat in silence for the fourteen minutes.
6. Some crucial points that seem relevant here are:
 - 6.1. The request to attend a meeting on 7th March came completely out of the blue with no indication of why I had been invited or what had led up to it.
 - 6.2. Finbar Bowie assured me he would arrange for Andy Furlong to ring me before 7th March to explain what the meeting was about. This never happened.
 - 6.3. I had offered to go over to Leicester, or wherever else was convenient, to talk to Andy Furlong before the 7th March meeting. No response was received. Andy Furlong indicated that he did not want to communicate (see **Section 10.6**) which I think with hindsight was an error of judgement.

- 6.4. I had been told that the meeting on 7th March was "*a meeting of Rushcliffe CLP*" (**Section 6.1** and elsewhere).
- 6.5. I had not been informed of any complaints made against me contrary to standard practice. I only discovered that complaints had been made upon receiving the Charges Pack on **28th July 2017**.
- 6.6. Previously, *all* Labour Party meetings in Rushcliffe were considered open to which members were welcome and this includes previous EC meetings. I had personally been told that by Liz Plant and Sandra Coker at meetings. Three members were explicitly told this about the 7th March meeting by a previous CLP Secretary and an EC member.
- 6.7. I had told Finbar Bowie that I would attend the meeting on 7th March only if it were a meeting about moving forward positively in the CLP. I did not receive a reply. It is unclear whether this was ever communicated to Andy Furlong or Gill Aldridge, the CLP Chair.
- 6.8. Whether the meeting was to be open or closed was never discussed by the EC and was not in any meeting notification. The closed nature of the meeting was only decided after 8:00pm *by Andy Furlong*. It should have been a decision taken by the EC itself; it never was.
- 6.9. Members of the EC were not told of Andy Furlong's attendance at the meeting on 7th March until shortly before the meeting, even though I was invited two weeks previously. It remains unclear who invited Andy Furlong to the meeting and what purpose his attendance was to serve.
7. It appears that some complaints or allegations had been made, but neither the nature nor existence of these complaints have been made transparent, nor have they been dealt with according to Labour Party Rules (by an independent subcommittee of the GC).
8. The taking of the minutes of this meeting by one of the apparent instigators of allegations (the former CLP Secretary) has to be improper.
9. The quite aggressive and uncomradely way the observers were treated at the 7th March meeting, and subsequently, is both unjust and unbecoming a democratic socialist party.
10. It appears that the intention behind the 7th March meeting was to invite me to a meeting about "complaints" without informing me that complaints had been made against me, without informing me of the nature of those complaints, and then give me five minutes to respond to complaints and allegations about which I would know nothing. This cannot in any way be considered an appropriate, transparent or just procedure for dealing with disputes between members.

Charge 3

Since the matter was last considered by the NEC Disputes Panel on the 17th January 2017, you are alleged to have acted in a bullying, intimidating and otherwise hostile manner towards a number of other members of the CLP including, but not limited to excessive correspondence in breach of the Labour Party's Bullying & Harassment policy.

Responding to this Charge is quite easy as there is no evidence of me "acting in a bullying intimidating and otherwise hostile manner ... including excessive correspondence". Indeed, there is no reference to correspondence from me at all by Keri Dutczyn-Howe or Gill Taylor.

Keri Dutczyn-Howe

Keri joined the Party in June 2016 and, due to the various cessations of meetings, has not engaged particularly in Branch or CLP meetings. I have only met Keri on a very small number of occasions, I guess less than half a dozen. At no time has there been any suggestion that I was bullying, intimidating or harassing her or anyone else; our encounters have all been professional and positive. It is difficult therefore to see any substance in the Charge.

1. Keri Dutczyn-Howe alleges there is "misogyny and uncomradely behaviour amongst some members of the West Bridgford Branch". She does not identify which members this is, so it is difficult to see what it has to do with me. This should be taken up with the relevant officers and procedures but it does not appear that Keri has been given the information to do that.
2. Keri Dutczyn-Howe alleges she has spoken to "a few highly talented, motivated women" who share her concern, but neither identifies what the concern is nor who these women are.
3. Keri Dutczyn-Howe "believes Peter Gates is manipulating a group of people he has collected". This is quite a patronising way refer to members. Again, Keri offers no evidence of this allegation which has no foundation in reality, but is immensely patronising (and therefore uncomradely) to a large number of local members.
4. Keri Dutczyn-Howe alleges that she has "suggested other women for officer roles and has been concerned at how quickly these have been dismissed in their absence by Peter Gates". This is quite untrue. I do not know what Keri is referring to, nor which women she is referring to. The allegation is without foundation; I have never had such conversations with Keri.
5. Keri Dutczyn-Howe alleges "I have never seen any credible instance when any active women have been encouraged and/or supported by Peter and a close inner core of his supporters". This is a fantastical allegation. There are a large number of women that I have encouraged to become involved at a BLP and CLP level, some of whom are now BLP and CLP officers. That Keri might not know this is because Keri has not been particularly engaged. I can here name two women I have encouraged in particular — Keri Dutczyn-Howe and Gill Taylor.

Gill Taylor

I think I have only encountered Gill Taylor on about three or four occasions and at no time has there been any hostility between us. In February 2017, I took her to see Jeremy Corbyn who was speaking to Party members at a rally at the University of Nottingham. I attended two meetings of a local reading group and sat next to her. We have never had a crossed word. I cannot see any substance in the submission and allegations either Keri Dutczyn-Howe or Gill Taylor are making.

1. Gill Taylor seems to be drawing "hypotheses", in the absence of any evidence, about the operation of West Bridgford BLP. This should not be part of the charges against me.
2. Gill Taylor is making allegations about members who might meet up informally or in Momentum, and yet to my knowledge she has only attended one meeting.
3. Gill Taylor is questioning a number of procedures locally within West Bridgford BLP which should have been directed through the CLP.