

**DECISION OF THE CERTIFICATION OFFICER ON AN APPLICATION
MADE UNDER SECTIONS 55(1) AND 108A (1) OF THE TRADE UNION AND
LABOUR RELATIONS (CONSOLIDATION) ACT 1992**

Mr Dooley

V

Union of Construction, Allied Trades and Technicians

Preliminary Hearing

Date of Decision

17 December 2010

DECISION

Upon application by Mr Dooley ("the claimant") under section 55 and section 108A (1) of the Trade Union and Labour Relations (Consolidation) Act 1992 ("the 1992 Act"):

I strike out each of the claimant's complaints of breach of the rules of the Union of Construction, Allied Trades and Technicians ("UCATT" or "the Union") on the grounds that they were made out of time. The complaints which are struck out are:-

1. Complaint 5; that the Union breached rule 23 (2) of the rules of the union between 15 May and 15 June 2009 by allegedly not ensuring that the 2009 General Secretary Election was by a ballot of all members in Great Britain and Ireland voting at their home address.
2. Complaint 6; that the Union breached rule 23(2) by allegedly not holding the General Secretary election in 2009 in the June of that year.
3. Complaint 9; that the Union breached rule 21(34) by allegedly not submitting to the whole of its membership the names of all candidates for the office of General Secretary in relation to the 2009 General Secretary election
4. Complaint 10; that the Union breached rule 28(7) by Mr Ritchie having written an article for the Morning Star newspaper which appeared on 18 May 2009, which allegedly sought to influence the votes of members in relation to the 2009 General Secretary Election other than through the responsible Committee or Council
5. Complaint 11; that the Union breached rule 28 (9) by allegedly allowing Mr Alan Ritchie, Mr Thompson and the Executive Council (EC) to use their positions to further Mr Ritchie's candidature in the run up to the 2009 GS election in the following respects:

- i) On 23 January, 14 March and 18 of April 2009 Mr Ritchie attended Regional Education Courses in Yorkshire, Newmarket and Cardiff respectively. He met with regional council members, shop stewards and local activists.
- ii) On 16 February 2009, John Thompson did not allow Mr Dooley's nomination address to inform members that he had a Law degree or that he had 30 years representing and negotiating. However he allowed Alan Ritchie to state that he was a member of UCATT for 40 years.
- iii) On the 26 March 2009 the Executive Council issued Guidance on the Publication of Election Addresses. This Guidance was designed to benefit Alan Ritchie one of the candidates in the election. Firstly, because it was different from the Guidance sent to the candidates in the election of Executive Council members in 18 April 2008 and secondly because it lead to confusion as to what could be put in the other information and or in Mr Dooley's election address.
- iv) Between 2 March and 20 May 2009, Mr Thompson, Mr Ritchie and the EC allowed unprecedented distribution of union literature to be sent to members in the weeks prior to the election of the General Secretary, all of which contained photographs, articles and references to only one candidate showing him in a positive light. This activity took place on 2 March 2009 (Hard Hat Bulletin) , 16 March 2009 (In-Site Bulletin), 25 April 2009 (Blacklisting leaflet), 26 April 2009 (Small Companies Kill Workers Brochure), 4 May 2009 (shop stewards handbook), 12 May 2009 (Building Worker Magazine) 20 May 2009(Strategic Forum Document for safety representatives on effective worker involvement)

REASONS

1. This hearing was held to determine if any or all of Mr Dooley's complaints had been made out of time.
2. Mr Dooley is a member of the Union of Construction, Allied Trades and Technicians ("UCATT" or "the Union"). By an application to me dated 15 December 2009 the claimant complained of five breaches of the rules of the Union and six breaches of statute by his Union in relation to the 2009 General Secretary election. Following correspondence with Mr Dooley, 11 complaints were identified which were confirmed by him and put to the Union in the following terms:

Complaint 1

The union breached section 50 (1) of the 1992 Act between 15 May and the 15 June 2009 by sending ballot papers to only 43% of the union's total membership therefore not ensuring that entitlement to vote be accorded equally to all members of the trade union

Complaint 2

The union breached section 49 (5) of the 1992 Act on 15 May 2009 by not notifying members of the appointment of the scrutineer, before the scrutineer began to carry out his function, in relation to the 2009 General Secretary Election

Complaint 3

The union breached section 52 (4) of the 1992 Act on 16 September 2009 by not either sending a copy of the scrutineer's report relating to the 2009 General Secretary Election to all members or taking all such other steps for notifying the contents of the report to the members of the union (whether by publishing the report or otherwise) as it is the practice of the union to take when matters of general interest to all its members need to be brought to its attention

Complaint 4

The union breached section 52(5) of the 1992 Act on 16 September 2009 by not issuing a statement, with the notification or copy of the scrutineer's report, that the union will, on request, supply any member of the union with a copy of the report

Complaint 5

The union breached rule 23 (2) of the rules of the union between 15 May and 15 June 2009 by not ensuring that the 2009 General Secretary Election was by a ballot of all members in Great Britain and Ireland voting at their home address

Complaint 6

The union breached rule 23(2) by not holding the General Secretary election in 2009 in the June of that year

Complaint 7

In breach of section 49(5A) (a) of the 1992 Act the union did not supply the scrutineer with a copy of the register of names and addresses of its members for the purposes of the General Secretary election 2009. The register provided contained less than 50% of the names and addresses of which the union had members

Complaint 8

The union breached section 51(3) of the 1992 Act in relation to the 2009 General Secretary Election in that not all members entitled to vote were allowed to do so without interference or constraint. In not sending ballot papers to a large number of members those members entitlement to vote was both interfered with and constrained.

Complaint 9

In breach of rule 21(34) the union did not submit to the whole of its membership the names of all candidates for the office of General Secretary in relation to the 2009 General Secretary election

Complaint 10

In breach of rule 28(7), Mr Ritchie wrote an article for the Morning Star newspaper which appeared on 18 May 2009, which sought to influence the votes of members in relation to the 2009 General Secretary Election other than through the responsible Committee or Council

Complaint 11

The union breached rule 28 (9) by allowing Mr Alan Ritchie, Mr Thompson and the Executive Council (EC) to use their positions to further Mr Ritchie's candidature in the run up to the 2009 GS election in the following respects:

- i) On 23 January, 14 March and 18 of April 2009 Mr Ritchie attended Regional Education Courses in Yorkshire, Newmarket and Cardiff respectively. He met with regional council members, shop stewards and local activists.
- ii) On 16 February 2009, John Thompson did not allow Mr Dooley's nomination address to inform members that he had a Law degree or that he had 30 years representing and negotiating. However he allowed Alan Ritchie to state that he was a member of UCATT for 40 years.
- iii) On the 26 March 2009 the Executive Council issued Guidance on the Publication of Election Addresses. This Guidance was designed to benefit Alan Ritchie one of the candidates in the election. Firstly, because it was different from the Guidance sent to the candidates in the election of Executive Council members in 18 April 2008 and secondly because it lead to confusion as to what could be put in the other information and or in Mr Dooley's election address.
- iv) Between 2 March and 20 May 2009, Mr Thompson, Mr Ritchie and the EC allowed unprecedented distribution of union literature to be sent to members in the weeks prior to the

election of the General Secretary, all of which contained photographs, articles and references to only one candidate showing him in a positive light. This activity took place on 2 March 2009 (Hard Hat Bulletin) , 16 March 2009 (In-Site Bulletin), 25 April 2009 (Blacklisting leaflet), 26 April 2009 (Small Companies Kill Workers Brochure), 4 May 2009 (shop stewards handbook), 12 May 2009 (Building Worker Magazine) 20 May 2009(Strategic Forum Document for safety representatives on effective worker involvement).

3. I investigated the alleged breaches in correspondence and decided that there should be a preliminary hearing to determine whether the application had been made in time in accordance with section 54(3) (the breach of statute complaints) and section 108A(6) and (7) (the breach of rule complaints) of the 1992 Act. A preliminary hearing took place on 6 December 2010. At the hearing, the Claimant represented himself and gave evidence in accordance with his written witness statement. The Union was represented by Mr Hogarth QC instructed by Mr Cottingham of OH Parsons and Partners. No oral evidence was given on behalf of the Union. Both parties provided written skeleton arguments. The rules of the Union were before me, together with a 407 page bundle of documents. A further six documents submitted by the claimant were admitted at the hearing.

Findings of Fact

4. Having considered the oral and documentary evidence and the representations of the parties, I find the facts to be as follows:-
5. Mr Dooley is a member of UCATT and one of its employees. He has been a regional official since about 1998 and is based at the Union's premises in London SW4, which is both a Regional Office and the Union's Head Office. Mr Dooley studied at Ruskin College Oxford and obtained a law degree from Brunel University. In 2009 Mr Dooley stood as a candidate in the election for General Secretary of his Union. He was the only opponent of the incumbent General Secretary, Mr Alan Richie.
6. The Union appointed Electoral Reform Services Limited ("ERS") as its scrutineers for the 2009 General Secretary election under section 49 of the 1992 Act. The Union's president, Mr John Thompson, was appointed by the Executive Council ("EC") to oversee the election process until the end of the nomination period when ERS would take over this responsibility. A Union employee, Mr Jim Kennedy, was responsible for the day to day administration of the election at the Union.
7. Voting in the 2009 General Secretary election took place between 15 May and 15 June 2009. On 15 June, ERS wrote to Mr Thompson with the election results. Mr Dooley was unsuccessful, having received 4,431 votes against 6,706 for Mr Richie. The number of eligible voters was reported as being 56,867. Mr Dooley was advised on the telephone that afternoon by Mr Thompson that he had lost, which information was confirmed to him in a letter from Mr Thompson dated 16 June. However, this letter only gave the number of votes cast for each candidate. It did not give the number of eligible voters. Mr Dooley maintained that he only discovered this information on or about 18 September when he obtained access through a link on the Union's website.

8. By a 12 page letter to Mr Thompson dated 16 July 2009, Mr Dooley made 14 complaints about the General Secretary election in 116 numbered paragraphs. The complaint was said to be against the EC and Mr Dooley asked for it to be placed before the appropriate body, which Mr Dooley considered to be the Union's General Council. The General Council is a body which must meet once a year to consider appeals or when otherwise required to meet upon receipt of resolutions from 20 branches.
9. Also on 16 July 2009, Mr Dooley wrote to his Regional Secretary, Mr Swain, to raise a formal grievance as an employee of the Union about being harassed and victimised as an employee. By rule 18(15), the EC is empowered to draw up a separate grievance procedure for full time officers and it was common ground that this grievance was submitted under that procedure.
10. In August 2009, the EC endorsed the scrutineer's report on the election results and agreed to forward it to all branches, as well as placing it on the Union's website. By a letter dated 27 August, Mr Thompson informed all branch and regional secretaries of the election results by incorporating the scrutineer's report as part of his letter.
11. On 27 October 2009, Mr Dooley attended a hearing into his grievances as an employee. His original grievances had been supplemented in a letter dated 17 October by three more complaints, one of which related to an article by the General Secretary in the Morning Star. By a letter dated 29 October, Mr Dooley's grievances were rejected.
12. On 16 November 2009, Mr Dooley wrote to Mr Thompson asking to be informed of the progress of the complaint contained in his letter of the 16 July. He also amended certain figures contained in his earlier letter. He referred to the Union's Annual Return to the Certification Office in 2009 as showing that the Union had a membership of 130,859 for the year 2008. Mr Dooley enclosed a copy of his letter of 16 July.
13. By a letter dated 14 December 2009, Mr Thompson informed Mr Dooley that he had not received his letter of 16 July but that his complaints had nevertheless been placed before the EC at its recent meeting. Mr Dooley was informed that the EC considered his complaints could not be dealt with by any individual or committee within the Union nor could they be directed to the General Council as they did not have power to deal with them under rule. In rejecting Mr Dooley's complaints, Mr Thompson suggested that he might have brought them as disciplinary charges against named individuals under rule 26.
14. Shortly before receiving the Union's letter of 14 December 2009, Mr Dooley made his application to the Certification Officer. This was by a Registration of Complaint Form which was received at my office on 15 December 2009.

The Relevant Statutory Provisions

15. The provisions of the 1992 Act which are relevant for the purposes of this application are as follows:-

Section 108A Right to apply to Certification Officer

(1) A person who claims that there has been a breach or threatened breach of the rules of a trade union relating to any of the matters mentioned in subsection (2) may apply to the Certification Officer for a declaration to that effect, subject to subsections (3) to (7).

(2) The matters are -

- (a) The appointment or election of a person to, or the removal of a person from, any office
- (b) – (e) ...

(6) An application must be made -

- (a) within the period of six months starting with the day on which the breach or threatened breach is alleged to have taken place, or
- (b) if within that period any internal complaints procedure of the union is invoked to resolve the claim, within the period of six months starting with the earlier of the days specified in subsection (7).

(7) Those days are -

- (a) the day on which the procedure is concluded, and
- (b) the last day of the period of one year beginning with the day on which the procedure is invoked.

Identification of the Issues

16. In the course of the hearing a number of matters were clarified. First, the Union conceded that the claimant's complaints of breach of statute had been made in time, which had not been clear in the Union's correspondence with my office.
17. Secondly, the Union conceded that it had received Mr Dooley's letter of 16 July 2009, notwithstanding the statement in Mr Thompson's letter of 14 December that it had not done so.
18. Thirdly, the Union conceded that the majority of the complaints of breach of rule that Mr Dooley was now seeking to make had been raised with the Union in his letter of 16 July 2009. The only complaints to me which the Union alleged had not been properly raised with it related to complaint 10 and two aspects of complaint 11(iv).
19. Fourthly, Mr Dooley conceded that his complaints to me had not been brought within the primary limitation period of 6 months starting with the day on which the breaches were alleged to have taken place. The last day of voting was 15 June 2009 and Mr Dooley's Registration of Complaint Form was received at my office on the 15 December 2009. Mr Dooley stated frankly that he had thought that in submitting his application on 15 December, he had submitted it in time in respect of breaches

which occurred on 15 June. However, at the hearing, he accepted that his Registration of Complaint Form was one day out of time to complain about alleged breaches on 15 June.

20. Having regard to the above concessions, the issues for me to determine related exclusively to the application of section 108A(6) and (7) of the 1992 Act to Mr Dooley's allegations of breach of the rules of the Union and whether Mr Dooley could take advantage of the extended limitation period contained in those provisions.

Summary of Submissions

21. Mr Dooley submitted that his breach of rule complaints were within the extended limitation period permitted by the 1992 Act as he had invoked an internal complaints procedure of the Union to resolve them within six months of the day on which the alleged breaches had taken place. He asserted that the complaints procedure had concluded on 14 December 2009. Mr Dooley accepted that the Union had no relevant internal complaints procedure in its Rules or in a separate document but he argued that there was no requirement for such a procedure to be in writing. He placed emphasis on the word "any" in the phrase "any internal complaints procedure" in section 108A(6)(b) of the 1992 Act. Mr Dooley argued that he was assisted by the decision of the Employment Appeal Tribunal ("EAT") in **Bakhsh v. Unison (UKEAT)/0375/08** in which the EAT accepted that that phrase can properly be given a "fairly wide meaning". Mr Dooley submitted that the internal complaints procedure which he used was created or evidenced by the General Secretary's letter to him of 30 January 2009. By a letter dated 23 January, Mr Dooley had asked the General Secretary to send him a copy of the National Directory of Branches in order that he might write to the branches directly about his proposed candidature. The General Secretary's reply of 30 January refused this request and informed Mr Dooley that he should submit any material to the General Office for circulation to the branches. The General Secretary's letter went on to state, *"If you do not agree, you are entitled to raise the issue with the EC of the Union. A similar letter has been sent to another candidate concerning the same issue."* At that time there was thought to be three likely candidates in the election. Mr Dooley submitted that this created the internal procedure of raising complaints in relation to the General Secretary election with the EC. He further submitted that he used this procedure on 14 April 2009 when he wrote to Mr Thompson to contest the decision to send out information about the candidates with the ballot papers. That complaint was placed before the EC at its meeting on 16 April and, by a letter from Mr Thompson dated 17 April, Mr Dooley was informed that his complaint was rejected. Mr Dooley argued that the fact that this complaint was considered by the EC is evidence of the existence of an internal complaints procedure. He also relied upon the final sentence in Mr Thompson's letter which states that he had a right of appeal to General Council if not satisfied in whole or in part with the response. Mr Dooley argued that his letter to Mr Thompson of 16 July 2009 was submitted in accordance with this procedure and was intended to resolve the complaints that it described. He further submitted that any election process is likely to give rise to a number of complaints and that it is highly unlikely that the Union would not have any internal complaints procedure to deal with them.
22. Mr Dooley further argued that each of his complaints to me had been raised with the Union in his letter of 16 July 2009, except for the following. Complaint 10 refers to an

article by the General Secretary in the Morning Star. Mr Dooley stated that he raised this in his grievance letter as an employee of 17 October and that the phrase “any internal complaints procedure” is broad enough to include such a grievance procedure. As to complaint 11(iv) Mr Dooley accepted that there was no express reference to “2 March 2009 (Hard Hat Bulletin)” or to “20 May 2009 (Strategic Forum Document ...)” but he argued that these were incorporated within his reference to “several booklets, documents or other materials ... included where (sic)”.

23. Mr Hogarth QC for the Union, argued that each of Mr Dooley’s complaints of breach of rule were out of time. He submitted that Mr Dooley had simply miscalculated the primary limitation period when submitting his Registration of Complaint Form on 15 December 2009 and was now trying to construct an argument to take advantage of the extended limitation period. In Mr Hogarth’s submission, there was no relevant internal complaints procedure for Mr Dooley to take advantage of. He rejected Mr Dooley’s argument that such a procedure had been created by the General Secretary’s letter of 30 January 2009 and argued that this was just an ad hoc arrangement to deal with the issue that had been raised by Mr Dooley. Mr Hogarth considered that an internal complaints procedure for these purposes would normally be in the rules but that, in any event, it must be an extant procedure which is available to any member who might wish to complain, not merely to an individual who has in fact complained. Mr Hogarth further submitted that the inclusion of the word “any” in the phrase “any internal complaints procedure” did not give the phrase unlimited breadth, as the procedure in question must be invoked to resolve the claims. Mr Hogarth went on to argue that this phrase did not include a grievance procedure available only to full time officers of the Union but was limited to procedures available to members of the Union, consistent with the jurisdiction of the Certification Officer in this part of the 1992 Act which relate only to breaches of union rules.

Conclusions

24. It was correctly conceded by the Union that Mr Dooley’s complaints of breach of statute had been made in time and I so find.
25. I turn now to Mr Dooley’s complaints of breaches of rule. In order for these to have been made in time, they had to be made in accordance with section 108A(6) and (7) of the 1992 Act. These provisions require an application to be made within six months of the day on which the breaches were alleged to have taken place (“the primary limitation period”) or within an extended period if, within that period of six months, “any internal complaints procedure of the Union is invoked to resolve the claim (“the extended limitation period”)”.
26. Mr Dooley accepted at the hearing that his complaints of breach of rule were made outside the primary limitation period and so the issue for me to determine is whether Mr Dooley can take advantage of the extended limitation period. He can only do so if there was an internal complaints procedure of the Union for him to invoke to resolve the claim and he did so.
27. In considering the application of section 108A(6) and (7), I note that the primary limitation period of six months is relatively generous compared to many jurisdictions

of the Employment Tribunal. The aim of any claimant should be to make his or her complaint within the primary limitation period unless there is a permitted reason not to do so. In the event of any doubt as to whether the conditions which attach to the extended limitation period apply, the claimant should make his or her complaint within six months of the alleged breach. On the facts of this case, I observe that Mr Dooley attempted to make his application within the primary limitation period but failed to do so. Accordingly, it was not Mr Dooley's intention to take advantage of the extended limitation period but he is now obliged to seek to do so.

28. The phrase "any internal complaints procedure of the union" has been considered by the EAT in the case of **Bakhsh**. In that case the EAT, presided over by Underhill P, found as follows at paragraph 14:

"Mr Segal submitted that nothing in the correspondence between Mr Bakhsh and the Union constituted the "invocation" of an "internal complaints procedure". In our view that is correct. We accept that that phrase can properly be given a fairly wide meaning, so as – for example – to cover an appeal procedure. But it is essential that some recognisable formal procedure should be being followed. That seems to us to be inherent in the words themselves; but such a construction is in any event necessitated by the requirement of s-s. (7) that there be specific dates at which it can be said that the procedure is being invoked and at which it is concluded. None of the correspondence that we have seen is of that character. The reference in Mr Bakhsh's e-mail of 25 January to wishing to "appeal" might indeed suggest the invocation of a formal procedure; but it is common ground before us that the Rules provide for no appeal from a decision to suspend, and it is in fact clear from the closing paragraph of the e-mail, which we have quoted, that what Mr Bakhsh was asking Mrs Highton to do was to reconsider her decision. The correspondence that follows is essentially of the same kind: Mr Bakhsh and his representative are advancing points to those whom they took to be the effective decision-takers about the validity of the investigation and the suspension and there is nothing that could fairly be regarded as the invocation of a complaints procedure."

29. Many trade unions have internal complaints or grievance procedures for their members which are either part of the rules of that union or exist as a separate document, often agreed by the EC. In such cases, there is seldom any difficulty in identifying the relevant procedure. However, the phrase in section 108A(6)(b) of the 1992 Act does not require the procedure to be in writing and it does describe the complaints procedure as being "any" complaints procedure. It is therefore possible to have such a procedure otherwise than in the rules or as a separate document. In accordance with the guidance of the EAT, however, I find that there must be "some recognisable formal procedure". The most obvious type of unwritten procedure which would qualify as such would be one which has been established by longstanding custom and practice, the terms of which can be identified with sufficient certainty and for which there is evidence of its notoriety amongst members. An indication that the procedure should be well known to members is the requirement that it must be a "procedure of the union".
30. Applying this approach to the fact of the present case, it is common ground that the Union does not have a relevant complaints procedure either in its rules or as a

separate standalone document approved by the EC. I reject the suggestion that rule 26, a disciplinary rule which is headed 'Procedure for Dealing with Charges', is such a procedure. The purpose of invoking a disciplinary procedure, by which members can raise charges against other members, is to secure the imposition of a penalty on that other member. Such a procedure is of a different nature to an internal complaints procedure, the intended result of which is that a member's complaints are addressed and resolved.

31. As to Mr Dooley's submission that the Union had an internal complaints procedure by virtue of the General Secretary's letter of 30 January 2009, I observe that there is no suggestion that this alleged procedure was well known to members of the Union. Indeed, the alleged procedure was only made known to Mr Dooley and one other, as is clear from the terms of the General Secretary's letter of 30 January. There was no evidence that such a procedure was known in any other way to, or used by, others. The alleged procedure appears to be that in relation to the election of General Secretary the persons made aware of the procedure were entitled to raise issues with the EC. By his letter of 14 April 2009, Mr Dooley did raise a complaint "for the attention of the EC" but it is noticeable that his complaint of 16 July was against the EC and he therefore sought to have it directed to the General Council. It is therefore not even clear that those complaints were raised under the procedure for which Mr Dooley now contends. In my judgement, these factors indicate that Mr Dooley's complaints of 16 July and 16 November 2009 were considered by the Union on an ad hoc basis and not under the terms of any internal complaints procedure of the Union. I find that the General Secretary's letter of 30 January neither created nor evidenced any such procedure. There was no evidence that such a procedure pre-dated the General Secretary's letter of 30 January. Mr Dooley's complaint of 14 April was stated to be for the attention of the EC and contested its decision to include information about the candidates in a document to accompany the ballot papers. It was therefore, in essence, a complaint which asked a decision maker to reconsider the decision it had previously taken, much as Mr Bakhsh had sought to do in the case considered by the EAT. Having regard to the evidence as a whole, I find that Mr Dooley's letters of 16 July and 16 November 2009 were not the invocation by him of an internal complaints procedure of the Union to resolve his claims.
32. Should my above finding be wrong, I further find that the grievance procedure available to full time officers of the Union was not a procedure intended for the use of Union members to resolve complaints of alleged breaches of Union rules. The grievance procedure available to full time officers of the Union was therefore not an internal complaints procedure of the Union for the purposes of section 108A(6)(b) of the 1992 Act. Accordingly, I would not have found that Mr Dooley's complaint 10 had been made in time. I further find that there were two aspects of Mr Dooley's complaint 11(iv) which were made out of time on the grounds that no internal complaints procedure of the Union was invoked to resolve them. They are the complaints relating to "2 March 2009 (Hard Hat Bulletin)" and "20 May 2009 (Strategic Forum Document ...)". I find that these were not complaints made transparently by Mr Dooley's reference to "several booklets, documents and other materials" that appear in paragraph 85 of his letter of 16 July 2009.

33. For the above reasons, I strike out Mr Dooley's complaints of breaches of the rules of the Union on the grounds that they were made out of time.

A handwritten signature in black ink, appearing to read "David Cockburn", with a horizontal line underneath the name.

David Cockburn
The Certification Officer