

Schedule of Claims 2012

Key: LBL=London Borough of Lewisham TD=Tanya Davis NF=Nick French AD=Alan Docksey ANN=Alfo Nduka Nzekwue VN=Vidya Nauth PP=Pat Persaud CT=Chris Threlfall RT=Rita Lee KH=Karl Harry HW=Harvelyn Watson GM=Gill Moss JD=Julia Duncan CR= Cathy Robinson ES=Elaine Smith CG- Christine Grice VG=Valerie Gonsalves DR.G=Dr Chris Giagounidis JL=Jackie Lynham KM=Keith McMahon KN=Kath Nicholson NL=Nicollette Laurence KP=Kate Parsley FS=Frankie Sulke BQ=Barry Quirk MW=Marina Waters HW=Harvelyn Watson CB=Christine Bushell AG=Andreas Ghosh IS=Ian Smith CM=Cynthia Maxwell KH=Karl Harry DB=Delroy Bent HR=Helen Reynolds DP=Dave Prentis SP=Sohagi Patel FM=Francis Milivojevic DR.W= Dr Williams CL=Carol Lewis RW=Ralph Wilkinson EH= Elaine Hattam KS= Kevin Sheehan **COV REC=** Covert Recording

Ms AA Vaughan v London Borough of Lewisham and others

Case Number: 2375023/2011B

Protected Disclosures

No.	Date of disclosure(s)	Disclosure(s) made to	Method of disclosure(s)	Document	Location/witness	Breach	ET1 Paragraph(s)	Detriment
1.	5 April 2011 & 7 & 8 April (at 09.48 & 15.27), 11 13 & 15 April (at 15.00) & 17 April & 20, 21 & 26 April (at 09.17, 06.28, 06.31, 07.58 & 10.55) & 27 April & at 12.55 & 28 April 2011 at	VG VG VG, ES & NF CT & CG CT & RL FS, CG & Unison CT	Oral Written (Email) Written (E-mail) Written (E-mails) Written & Oral Written (E-mail) Written (E-mail)	VG's Notes Supervision notes HSE Guidelines etc N/A AAV Notes & Minutes Attached docs to e-	Laurence Hse Laurence Hse N/A N/A Laurence Hse: TD N/A	<p>Protected disclosure:</p> <p>Failure to comply with TUPE legislation (see left hand column- repeated disclosure); asserting my statutory rights</p> <p>Failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974); my workplace fraught with adverse working conditions resulting in unacceptable levels of stress (see left hand column- repeated disclosure).</p> <p>The failure to act in accordance with policy and procedure.</p> <p>Failure to follow government guidelines in relation to ES9 (a legal document), (see left hand column- repeated disclosure);</p> <p>PIDA Detriment: section 43B (1) (b), (d) & (f), of the ERA 1996). (LBL's attempt to conceal information about 43B (1) (b), (d). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises).</p>	9 – 49, 51 – 58, 66, 68, 76, 91, 94 - 96	The issuing a letter advising me that I was not employed by LBL & the handling of my protected disclosures: i.e. The handling of the proposed line management change to NF; the failure to deal with my protected disclosures in an appropriate and effective manner & adopt procedures which are open & demonstrate accountability- thus enabling me to feel confident about raising my concerns, without any risk to myself; the persistent delays to address the matter & the letter from AD putting pressure on me to send further info and meet with him & the outcome of his subsequent investigation.

	11.27 & 23, 24, 25 & 31 May 2011 (at 10.42, 15.05, 11.00 & 13.15)	ES, VG CT & Unison	Written (E-mail)	mail N/A				
2.	6 May 2011 & 9 May 2011 (at 10.13 & 13.13) & 9 May 2011 (at 08.33) & (not related to delay in OH referral), 18 & 19 May 2011 (at 11.39 & 16.04) & 25 & 26 May 2011 (at 16.20 & 18.24 & 05.42)	CT, VG, RL & Unison VG, NL, ES, CT CT, VT & Unison VG ES, CT, VG & Unison	Written (E-mail) Written (E-mail) Written (E-mail) Written (E-mail)	Letter from GP N/A Letter from GP N/A N/A N/A	N/A N/A N/A N/A	<p>Protected disclosure:</p> <p>Failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974); my workplace fraught with adverse working conditions resulting in unacceptable levels of stress;</p> <p>Failure to safeguard my confidential, sensitive personal information, as required by Data Protection Act 1998; Asserting my statutory rights; Breach of Article 8 Grievance & appeal: Complaint against VG: Bullying, harassment and victimization (breach of contractual duties) & CG's failure to reach a reasonable conclusion and inaccurate/false findings made/ the failure to act in accordance with policy and procedure.</p> <p>PIDA Detriment: section 43B (1) (b) (d), (f) & 100(1)(d) of the ERA 1996). (CG's attempt to conceal information about 43B (1) (b), (d). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises)& breach of Article 3 & 8</p>	11 - 88m, 88t, 88u, 89a, 89c-e, 89g, 89i, 89l, 89n - p, 89q - t, 89v, 90 - 94b- d, 94f- g, 94j, 94l, 94n, 94r, 94t	<p>The handling of the initial OH process & my request for 'reasonable adjustments & support: a) The delay in referring me to OH and the failure / delay in conducting / implementing a DSE, stress risk assessment, H&S induction & an adequate personal risk assessment & the associated 'reasonable adjustments'; the failure and the delay in providing me with the tools / resources / information and guidance to enable me to do my job, inc Management's failure to advise me / explain in advance, the decision not to invite me to the induction to Lewisham session & b) The breach of my condition & information relating to my protected disclosures (via OH referral for CR & the subsequent handling of the 'investigations' into this- the findings were inaccurate / false, it was not in line with normal policy and procedure, there were unreasonable delays, I was treated less favorably than CR and there was a failure to reach a reasonable conclusion. Breaches of Article 3 & 8- It is not uncommon where ill-treatment fails to meet the level of severity demanded by Article 3 that a violation of Article 8 may have occurred as Article 8 protects a person's physical integrity as an aspect of private life.</p> <p>Also relates to disclosure(s) in claim number 1</p>
3.	21 April (at 11.10, 11.45, 12.12, 13.05 & 13.42) &	ANN, CT, CG, RL, GM, VN, NF & Unison	Written (E-mail)	N/A	N/A	<p>Protected disclosure:</p> <p>Failure to comply with TUPE legislation; asserting my statutory rights; Complaint against ANN: Bullying, harassment and victimization (breach of contractual duties) CT's failure to address the issue.</p> <p>PIDA Detriment: section 43B (1) (b), (d) of the ERA 1996). Section 100(1)(d) of the Employment Rights Act</p>	10, 20, 26 - 28, 31, 33, 36 - 37, 47, 90 - 91, 94e	<p>The way my first salary payment was dealt with: cash/security issues, tone of correspondence from HR, (unsympathetic, sharp, disproportionate, impersonal/no phone call & the delay in providing me with appropriate and accurate information regarding my April / May salary, (it is suspected that an LBL Lawyer was impersonating ANN) & CT's failure to address the issue</p>

	26, 27 & 28 April (at 06.28, 11.16 & 14.20)	VN, CT, CG, ANN & Unison	Written (E-mail)	N/A	N/A	(1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises).		Also relates to disclosure(s) in claim no.s 1 & 2
4.	(See disclosures 1 - 3) & 23 May 2011	LBL, RL, (forwarded to VG, ES & CG)	Written (OH report)	N/A	N/A	(As set out in breach 2 above)	26, 30, 34, 36, 52 – 56, 60, 63, 67 – 68, 70, 72, 74, 77, 81, 83, 88a – b, 88d, 88f – j, 88t, 90 – 91, 94f – g, 94j, 94l, 94n – m, 94r – t,	The handling of communication: a) The failure to adhere to the OH recommendation; the persistent failure to respond to my e-mails and/or address the concerns raised / queries made / provide information requested 'in good time' & b) Management copying in the legal team into e-mail responses to me, LBL's lawyers impersonating staff via e-mail & an LBL lawyer contacting me via my work e-mail regarding the tribunal case Also relates to disclosure(s) in claim no.s 1 - 3
5.	(See disclosures 1 - 4) & 7, 9, 13, 18, 21 & 22 June (at 10.19, 09.56, 09.59, 18.34, 00.58, 15.27, 08.06 & 12.42)	ES, CG, RL, FS, BQ, Unison, VG, NL & KP	Written (E-mails)	N/A	N/A	(As set out in breach 2 above) & inc ES's/LBL's failure to address my complaints about VG & ES's/LBL's the failure to act in accordance with policy and procedure.	59, 63 - 64, 68 – 69, 73, 90 – 91, 94h-i, 94k, 94m,	VG'S ES's & CG's behaviour / harassment of me: a) ES's conduct re my psychotherapy appointments; ES's and CG's harassment of me on 29 June 2011 & copying in VG to information regarding my health without my consent (after the data protection breach) & b) VG's and ES's actions (requiring me to still accept being line managed by VG), after the data protection breach & VG's conduct towards me during the team meeting on 21 June 2011 (inc ES's failure to address this). Also relates to disclosure(s) in claim no.s 1- 4
6.	(See disclosures 1 - 5) & 28 June 2011	CG, RL & JL	Oral	JL's & RL's	Laurence Hse	(As set out in breaches 2 & 5 above) & inc complaint against ES : Bullying, harassment and victimization (breach of contractual duties) & CG's & ES's failure to reach a reasonable conclusions & inaccurate/false findings made. The failure to act in accordance with policy and procedure.	71 – 72, 74, 79, 81, 87, 88t, 90 – 91, 94l, 94n, 94r	Management's handling of meetings with me: a) The handling of the meeting on 28 June 2011: no apology given, denying knowledge of the data protection breach/my complaint, the failure to provide an adequate explanation for the delay in implementing a stress risk assessment, H&S induction, a personal risk assessment

	<p>& 29 June 2011 (at 15.02 & 16.51)</p> <p>30 June 2011</p>	<p>ES, CG, FS, BQ & Unison</p> <p>CG, ES & JL</p>	<p>Written (E-mails)</p> <p>Oral</p>	<p>Minutes</p> <p>JL's & CG's Minutes</p>	<p>Laurence Hse</p>			<p>& 'reasonable adjustments', the failure and / or delay in changing my line management and requiring me to attend another meeting & b) The handling of the meeting on 30 June 2011: It was not a genuine attempt to support me - i.e. no apology given, the false allegations made against me, the unacceptable explanation provided by ES for not getting back to me between 26 May & 29 June 2011 following the data protection breach, CG's, statement- 'I am not here to answer your questions', the attempt to deter me from making any further contact with FS & BQ, the appointment of ES as my line manager & the inaccurate/false notes provided by CG & the delay and/or failure in sending me the notes to the meetings which took place on 28 and 30 June 2011</p> <p>Also relates to disclosure no.s 1 – 5</p>
7.	<p>30 June (at 18.58) &</p> <p>1 July (at 11.16 & 14.48) &</p> <p>1 July</p> <p>5 July 2011 &</p> <p>8 & 12 July 2011 (06.58 & 12.41) &</p> <p>20 July 2011</p>	<p>CG, Unison, FS, ES & BQ</p> <p>CG, ES & Unison</p> <p>LBL, VG, ES & CG</p> <p>ES</p> <p>GM, ES, CG & Unison</p> <p>ES & MW</p>	<p>Written (E-mail)</p> <p>Written (E-mail)</p> <p>Written (BW's assessment) Oral</p> <p>Written (E-mail)</p> <p>Oral</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p> <p>AAV's Notes</p> <p>N/A</p> <p>AAV's & ES's Notes</p>	<p>N/A</p> <p>N/A</p> <p>Laurence Hse</p> <p>N/A</p> <p>Laurence Hse & OH</p>	<p>(As set out in breaches 2 & 5 - 6 above) & inc complaint against ES & MW: Bullying, harassment and victimization (breach of contractual duties). LBL's failure to reach a reasonable conclusion; The failure to act in accordance with policy and procedure & professional ethics & breach of data protection. PIDA Detriment: section 43B (1) (b) (d) & 100(1)(d) of the ERA 1996). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises).</p>	<p>75, 80, 82 – 86, 88a-88b, 88e, 88r, 90 – 91, 93, 94o – p, 94s,</p>	<p>The handling of my second referral to OH: a) The failure of LBL and OHWorks to adhere to normal procedure, including the meeting which took place between MW and ES prior to my OH appointment, the failure to provide me with a copy of the referral form in advance of my appointment and set out clearly to me the reason for the referral, the false and / or conflicting accounts given by ES and MW about their meeting, the poor quality of MW's assessment & the failure by MW to comply with the ethics and code of conduct for her profession & b) The handling of my complaint relating to my second referral to OH, including the delay and/or failure by AG to respond to my complaint regarding the conduct of management and MW and LBL's failure to reach a reasonable conclusion regarding my complaint</p> <p>Also relates to disclosure(s) in claim no.s 1 – 6</p>
8.	<p>(See disclosures 1 - 7) &</p>					<p>(As set out in breaches 2 & 5 - 7 above)</p>	<p>29 – 31, 34, 39, 55 – 58, 60 – 61, 63, 67,</p>	<p>The failure of FS and BQ to intervene and take all steps as were reasonably practicable to prevent their employees from unlawfully discriminating against me</p> <p>Also relates to disclosure(s) in claim no.s 1 – 7</p>

	20 July 2011 (at 19.29)	ES, FS & MW	Written (E-mail)	N/A	N/A		69 - 70, 73, 84, 88b, 88d - e, 88g -h, 88m, 88p, 88r, 90 - 91, 93, 94q	
9.	(See disclosures 1 - 8) & 21 July 2011 (at 08.57)	ES	Written (E-mail)	N/A	N/A	<p>Protected disclosure: Complaint relating to rioting; the failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974); my workplace fraught with adverse working conditions resulting in unacceptable levels of stress; asserting my statutory rights; LBL's failure to act in accordance with policy and procedure & address the issues at the relevant time.</p> <p>PIDA Detriment: section 43B (1) (b) (d), (f) & 100(1)(d) of the ERA 1996). (LBL's attempt to conceal information about 43B (1) (b), (d). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises).</p>	85 - 86, 88b - v, 90 - 91, 94t	ES conduct towards me on 9 and 10 August 2011: a) the delay in responding to my request for a 'reasonable adjustment'; the refusal to make a 'reasonable adjustment', the delay in contacting me regarding the riots following receipt of my e-mail sent on 10 August 2011 at 2.33am, the harassment & victimisation of me via e-mail, telephone & in person (inc displaying aggressive and intimidating behaviour towards me and trying to provoke me); expecting me to wait at my office for instruction from her & b) expecting me to have been working from home when she had refused my request to work from home, the direction for me to be at work at 9am for no valid specific reason & the false allegation(s) made against me etc. (inc LBL's failure to address the duty of care issue & ES's conduct at the relevant time). Also relates to disclosure(s) in claim no.s 1 - 8
10.	(See disclosures 1 - 19) & 22 July 2011 (at 10.17)	HW & Unison	Written (E-mail)	N/A	N/A	<p>Protected disclosure: Failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974); my workplace fraught with adverse working conditions resulting in unacceptable levels of stress; asserting my statutory rights; Complaint against ES: Bullying, harassment and victimization (breach of contractual duties). Breach of Article 3; LBL's failure to act in accordance with policy and procedure & address the issue at the relevant time.</p> <p>PIDA Detriment: section 43B (1) (b) (d), (f) & 100(1)(d) of the ERA 1996). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises) & breach of Article 3 & 8</p>	88b- v, 90 - 93, 94u - w	The initial handling of my suspension from duty: a) The initial discriminatory handling of unsubstantiated allegations/Imposing the suspension & CG's bias statement- ' <i>it is felt that your employment with LBL is unsustainable</i> '; the failure to provide me with an adequate explanation for suspension; the threat of dismissal & the letter dated 11 August 2011 that was sent to me confirming the 'alleged' reasons for my suspension (which contradicted the verbal reasons given to me on 10 August 2011) & b) Blocking my e-mail access, restricting access to my workplace, instructing me to return my office keys and mobile phone' & isolating me from colleagues and defamation to my character etc. Breaches of Article 3 & 8- <i>It is not uncommon where ill-treatment fails to meet the level of severity demanded by Article 3 that a violation of Article 8 may have occurred as Article 8 protects a person's physical integrity as an aspect of private life.</i> Also relates to disclosure(s) in claim no.s 1 - 9

11. The alleged consequences of all these detriments (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 89y, 94w, 97 – 98 & covert recordings/transcriptions

Ms AA Vaughan v London Borough of Lewisham and others

Case Number: 2375023/2011B

Complaints of Discrimination

No.	Incident	Date	Person(s) Responsible	Location	Witness	Type of Discrimination	ET Paragraph(s)	Comparator	Protected act relied upon	Detriment
12.	LBL's treatment of me following my transfer to LBL (inc the Issuing a letter (after I had been at work at LBL for the whole week) advising me that I was not employed by LBL the handling of my protected disclosures)	9 April 2011 & March 30 - July 2011	CEL, BED & LBL LBL	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2), s26 & s.112(1) of the EA 2010	See claim no. 1 above, plus 89b, 89d & 93	Hypothetical	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010. E-mails/Notes set out in claim no. 1 above	a) The issuing of a letter to me by LBL (after I had been at work at LBL for the whole week) advising me that I was not employed by LBL & the handling of my protected disclosures
13.	The handling of the initial OH process, inc the breach: (see claim no.2 above) and my request for 'reasonable adjustments & support	5 April - 16 May 2011 & 5 April – the end of my employment	LBL, VG, CT, RL, ES, CG LBL, VG, ES, CG, CT	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010 & breach of of the Human Rights Act 1998, including: Article 3 & 8	See claim no. 2 above, plus 89c-e, 89g - i, 89l, 89n, 89t, 89v & 93	Hypothetical & CR	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 & 2 above	(See detriment(s) set out in claim no.2 of 2375023/2011B, above): the lack of clear direction, leadership & guidance from management was a form of indirect discrimination as this situation clearly adversely affected me as a disabled employee with a mental health condition which is exacerbated by unnecessary stressful situations, which could have and should have been addressed.
14.	The way my first salary payment was dealt with: (see claim no. 3 above)	15 April – 18 May 2011	LBL, ANN, CT, VN	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010	See claim no. 3 above, plus 89f & 93	Hypothetical	3 ET claims brought in April, July & Dec 2010 & E-mails set out in claim no.3 above	(See detriment(s) set out in claim no.3 of 2375023/2011B, above)
15.	The handling of communication: (see claim no.4 above)	From April -	LBL: Managem	N/A	N/A	ss20 - ss23, s.13(1), s.15,	See claim no.	Hypothetical	3 ET claims brought in April, July & Dec 2010;	The failure to adhere to the OH report recommendations & (see

		the end of my employment	ent Team, ANN, KM, IS			s.15(1)(a), s27, s27(2) & s26 of the EA 2010	4 above, plus 89g, 89l, 89n, 89o – p, 89t- u & 93,		allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 - 4 above	<i>detriment(s) set out in claim no.4 of 2375023/2011B, above)</i>
16.	VG'S, ES's & CG's behaviour / harassment of me: (see claim no.5 above)	2, 9, 13, 17, 20, 21 & 29 June 2011	VG, ES & CG	Laurence Hse	Key-work team & JL	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010	See claim no. 5 above, plus 89j, 89k, 89m, 89o & 93	Hypothetical	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 – 5 above	<i>(See detriment(s) set out in claim no.5 of 2375023/2011B, above)</i>
17.	Management's handling of meetings with me: on 28 & 30 June 2011: (see claim no.6 above)	28 & 30 June 2011	CG & RL	Laurence Hse	JL & RL	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010	See claim no. 6 above, plus 89n, 89p, 89t & 93	Hypothetical	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 - 6 above	<i>(See detriment(s) set out in claim no.6 of 2375023/2011B, above)</i>
18.	The handling of my second referral to OH & the related complaint regarding the conduct of management and MW: (see claim no.7 above)	14 June 2011 – present & 20 July – 12 Aug 2011	AG, LBL, RL, MW, CG & ES	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2), s26 & s.112(1) of the EA 2010	See claim no. 7 above, plus 89q, 89r, 89u	Hypothetical	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 - 7 above & letter dated 20 July	<i>(See detriment(s) set out in claim no.7 of 2375023/2011B, above)</i>
19.	FS & BQ handling of my e-mail dated 20 July 2011	20 July 2011	FS & BQ	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010	See claim no. 8 above, plus 89s	Hypothetical	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim	The failure of FS & BQ to intervene and take all steps as were reasonably practicable to prevent their employees from unlawfully discriminating against me

									no.s 1 – 8 above	
20.	ES's conduct towards me on 9 and 10 August 2011 & LBL's failure to address this at the relevant time: (see claim no.9 above)	9 & 10 Aug 2011	ES	Laurence Hse	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010	See claim no. 9 above, plus 89v & 93	Hypothetical	3 ET claims brought in April, July & Dec 2010; Equality form questionnaire; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 – 10 above	(See detriment(s) set out in claim no.9 of 2375023/2011B, above)
21.	The initial handling of my suspension from duty: (see claim no.10 above)	10 Aug – 17 Oct 2011	CG, RL, JD, ES, VG, CT, KP, NL, NF	Laurence Hse	JL & JD	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010 & Breach of the Human Rights Act 1998, including: Article 3 & 8	See claim no. 10 above, plus 89w – y	Hypothetical	3 ET claims brought in April, July & Dec 2010; Equality form questionnaire & follow up letter dated 3 Oct; ET claim lodged in Aug 2011; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in claim no.s 1 – 11 above	(See detriment(s) set out in claim no.10 of 2375023/2011B, above)

22. The alleged consequences of all these incidents of discrimination (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 89y, 94w, 97 – 98 & covert recordings/transcriptions

NB In relation to all three claims, as it is not possible to link a specific incident of discrimination to a specific protected act, (due to the fact that there are so many), the protected acts relied upon will include but not be limited to those referred to in the '**Protected act relied upon**' columns.

No.	Date of disclosure(s)	Disclosure(s) made to	Method of disclosure(s)	Document	Location/witness	Breach	ET1 Paragraph(s)	Detriment
1.	(See disclosures 1 – 11: case no. 2375023/2011B) & 9, 10 & 11 Aug, 27 Oct & 4 Nov (at 02.33, 11.41, 14.24, 23.27, 10.17, 16.38, 9.27 & 08.30) & 10 Oct 2011 & 25 Oct, 1 & 4 Nov 2011	(See disclosures 1 – 11: case no. 2375023/2011B) ES, FS, BQ, CG & Unison CG, BQ Unison CG & CM	(See disclosures 1 – 11: case no. 2375023/2011B) Written (Email/Letter) & Oral Written (Letter) Oral & written	(See disclosures 1 – 11: case no. 2375023/2011B) AAV's Notes dated 1 Nov Letter AAV's, LBL's & JL's Notes	(See disclosures 1 – 11: case no. 2375023/2011B) N/A JL & KH	Protected disclosure: Failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974); my workplace fraught with adverse working conditions resulting in unacceptable levels of stress; asserting my statutory rights Failure to comply with TUPE legislation & ES9's; asserting my statutory rights Failure to safeguard my confidential, sensitive personal information, as required by Data Protection Act 1998; Complaints against management & MW: Bullying, harassment and victimization (breach of contractual duties). LBL's failure to act in accordance with policies and procedures, (inc whistleblowing policy), reach reasonable conclusions & address the issues at the relevant time. PIDA Detriment: section 43B (1) (b) (d), (f) & 100(1)(d) of the ERA 1996). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises). Breaches of Article 6 & 10	62l, p, q, r, s & u, 63, 77, 77a & v	LBL's persistent failure since July 2011 to keep/provide accurate notes/minutes for the meetings/interviews that I attended (in terms of absent content, misinterpretations, false accounts & publishing statements I have not made/were not made by others etc). Breaches of Article 6 & 10 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B
2.	9 Aug & 3 Oct 2011	LBL Legal Dept-forwarded to CG by LBL Legal	Written (Email & Letter)	Equality form quest & follow up letter	N/A	Protected disclosure: Asserting my statutory rights; PIDA Detriment: section 43B (1) (b) (d), (f) of the ERA 1996). (LBL's attempt to conceal information about 43B (1) (b), (d).	48 & 77, 77b	The failure to provide a full/adequate response to the Equality form questionnaire in the allocated time Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosure in claim no. 1 above

3.	15 & 23, Nov (at 13.07, 10.43	CG, JL & Unison	Written (E-mail)	N/A	N/A	(As set out in breach 1 above– except for TUPE & MW complaint). Breaches of Article 3, 6 & 8	9d - j, l, o, p, q, 22, 26 - 30, 32 – 34, 37 - 42, 52, 56, 56j & k, 57, 58, 59, 61, 66, 71, 72, 77, 77d, e, q, 78a & d	LBL's persistent failure to invoke/implement the correct policies and procedures (sickness absence, induction, H&S, grievance and disciplinary) efficiently and effectively; no warnings given/consideration given to systemic issues, parity of treatment & inc my grievance against ES following receipt of this on 10 August 2011 & making the assumption that I would want to attend grievance hearings when it was aware that this was not the case. Breaches of Article 3, 6 & 8- It is not uncommon where ill-treatment fails to meet the level of severity demanded by Article 3 that a violation of Article 8 may have occurred as Article 8 protects a person's physical integrity as an aspect of private life. Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 – 2 above
4.	(See disclosures set out in no.1 above, dated prior to 17 Oct)					(As set out in breach 1 above– except for TUPE & MW complaint). Breaches of Article 3, 6 & 8	8d, 9p, 9q, 32, 42, 51, & 77, 77f	CG's denial that she had stated that my employment was 'unsustainable'. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case number 2375023/2011B & disclosures in claim no.s 1 – 3 above
5.	(See disclosures 1 – 11: case no. 2375023/2011B & no.s 1- 3 above)					(As set out in breach 1 above– except for TUPE & MW complaint) Breaches of Article 3, 6 & 8	8d, 9o, 15, 32, 33, 37, 38, 40, 44e, 46, 51, 56k, l, m, 58a – f, 62j, m, n, o, w, x, y, z, aa & cc, 64, 70, 73, 77, 77a & h	Further allegations made by ES, VG & other staff, (directly and indirectly inferred against me), including the perceptions. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 4 above
6.	(See disclosures 1 – 11: case no. 2375023/2011B & no.s 1- 2 above)					(As set out in breach 1 above– except for TUPE & MW complaint) Breaches of Article 3, 6, 8 & 10	9e, 56 – 66, 68 – 74, 77, 77a, c, e, h, j, l – v & 78a, c, 79	My treatment during my suspension & the investigation interviews: a) the requirement for me to attend three interviews regarding my suspension; it was dealt with in a heavy-handed manner; the failure to make 'reasonable adjustments' in relation to the investigation process to eliminate my disadvantage on 25 October & 1 November 2011; the unreasonable lengths of the interviews; the construction of the interview questions; On

								1 November 2011 I was on more than one occasion unduly accused of being 'rude & aggressive' & not calm; the removal of my valuable belongings (without my consent); management took several lengthy breaks; & b) On 4 November 2011 the unreasonable delay in responding to my request for a 'reasonable adjustment' in relation to the interview method & the insensitivity shown in dealing with this; stereotypical assumptions about the implications of my disability/my ability to perform my job was called into question; the attempt by CG and CM to prevent me from speaking & CG's offensive comment about my capability in relation to my communication skills. Breaches of Article 3, 6, 8 & 10 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 – 5 above
7.	(See disclosure s 1 – 11: case no. 2375023/2011B)					(As set out in breach 1 above) Breaches of Article 3 & 8 & breach of data protection.	9k, 62i, 77, 77k,	The secret meetings attended by CG, RL & MW to discuss me on 20 July 2011: a) the decision to hold a meeting about me, without my knowledge or consent & without me being present & b) LBL's and MW's failure to provide me with any written information relating to this and/or inform me at the relevant time that the meeting had taken place. Breaches of Article 3 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 6 above
8.	(See disclosure s 1 – 11: case no. 2375023/2011B & no.s 1- 3 above)					(As set out in breach 1 above– except for TUPE & MW complaint) Breaches of Article 3, 6, 8 & 10	66, 69, 77, 77a, c, e, j, l – v, 78a, 81, 82 – 83, 86	The handling of my suspension/ the investigation process: a) The failure to conduct a proper, fair & impartial interview investigation; the failure/delay of LBL to follow its policy & procedure in relation to my suspension review once it lasted more than two months & b) the decision to continue interviewing staff and advising me that I may also need to be re-interviewed; the failure/delay to provide me with the notes and the questions to the investigation interviews & LBL's failure to bring my suspension/the investigation to a timely and fair close (which resulted in the unnecessary detrimentally impact to my health, wellbeing and reputation). CG's investigation, took too long. Breaches of Article 3, 6, 8 & 10 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 7 above

9.	(See disclosure s 1 – 11: case no. 2375023/2 011B & no.s 1- 3 above)				(As set out in breach 1 above) Breaches of Article 3 & 8	8e, 21, 22, 44a, 53 – 54, 56i, 62i, 67, 77, 77w, 79, 82	The handling of the 3rd OH Process: a) The decision to make a 3 rd referral; the failure to action the two previous OH reports; LBL's decision to re-refer me OH, via OH Works following me bringing legal proceeding against OHWorks- (MW); the unreasonable delay in responding to my e-mail to CG dated 10 November 2011; the failure to deal with my medical condition in a sensitive & inclusive manner; the failure to make the 3 rd referral 'in good time'; the failure to provide me with a copy of the OH referral with a date on it & b) the decision to delegate MW/OHWorks the task of making my OH referral & the subsequent instruction for me to attend an OH appointment in Kent & the nature/content of CG's referral letter/ the failure to provide me with a copy of the OH referral with a date on it. Breaches of Article 3 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 8 above
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10. The alleged consequences of all these detriments (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 9o & q & s, 20, 27, 32, 34, 38 - 40, 42, 44a, 44e, 45- 46, 55, 56e & i, 62f & p, 64 - 65, 77c & 81 – 86 & covert recordings/transcriptions

Ms AA Vaughan v London Borough of Lewisham and others

Case Number: 2390531/2011

Complaints of Discrimination

No.	Incident	Date	Person(s) Responsible	Location	Witness	Type of Discrimination	ET Paragraph(s)	Comparator	Protected act relied upon	Detriment
11.	LBL's handling of note keeping/minutes for meetings/interviews since July 2011, (see claim no. 1 above).	From July 2011	LBL & CG	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010 & Breach of the Human Rights Act 1998, including: Article	See claim no. 1 above	Hypothetical	4 ET claims brought in April, July, Dec 2010 & Aug 2011; Equality form questionnaire & follow up letter dated 3 Oct; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meeti	LBL's persistent failure since July 2011 to keep/provide accurate notes/minutes for the meetings/interviews that I attended (in terms of absent content, misinterpretations, false accounts & publishing statements I have not made/were not made by others etc)

						6 & 10			ngs set out in no.s 1 - 11 of case no. 2375023/2011B & claim no. 1 of this case	
12.	LBL's handling of the Equality form questionnaire, (see claim no.2 above).	9 Aug – 16 Nov 2011	LBL	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010	See claim no. 2 above	Hypothetical	Previous 4 ET claims; Equality form questionnaire & follow up letter dated 3 Oct; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in no.s 1 - 11 of case no. 2375023/2011B & claim no. s 1 - 2 of this case	The failure to provide a full/adequate response to the Equality form questionnaire in the allocated time
13.	LBL's overall handling of the implementation of its policies and procedures (see claim no.3 above).	From April 2011	LBL, human resources & LBL's management Team	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010 & Breach of the Human Rights Act 1998, including: Article 3, 6 & 8	See claim no. 3 above	Hypothetical	Previous 4 ET claims; Equality form questionnaire & follow up letter dated 3 Oct; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in no.s 1 - 11 of case no. 2375023/2011B & claim no.s 1 - 3 of this case	LBL's persistent failure to invoke/implement the correct policies and procedures (sickness absence, grievance and disciplinary) efficiently and effectively; inc my grievance against ES following receipt of this on 10 August 2011 & making the assumption that I would want to attend grievance hearings when it was aware that this was not the case
14.	The false content of CG's letter dated 17 October 2011, (in relation to the comment that she made on 10 August 2011).	17 Oct 2011	CG	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010 & Breach of the Human Rights Act 1998, including: Article 3, 6 & 8	See claim no. 4 above	Hypothetical	Previous 4 ET claims; Equality form questionnaire & follow up letter dated 3 Oct; E-mails/Notes/Letters/meetings set out in no.s 1 - 11 of case no. 2375023/2011B & claim no.s 1 - 4 of this case	CG's denial that she had stated that my employment was 'unsustainable'

15.	I was further publicly defamed by LBL staff and evidence was falsified/fabricated against me, (directly and indirectly inferred).	From 9 Aug – 23 Nov 2011	CG, ES, VG, CT, KP, NL, NF	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2) & s26 of the EA 2010 & Breach of the Human Rights Act 1998, including: Article 3, 6 & 8	See claim no. 5 above	Hypothetical	(See protected acts above)	LBL's actions caused me great distress and embarrassment. I was humiliated, demeaned & LBL's actions defamed my character / caused detriment to my reputation & this will have an impact on my future employability.
16.	LBL's handling of my investigation interviews, (see claim no.6 above).	25 Oct, 1 & 4 Nov	CG & CM	Laurence Hse	JL, DB & KH	(See above-claim 15 – inc Article 3, 6, 8 & 10)	See claim no. 6 above	Hypothetical	(See protected acts above)	(See detriment(s) set out in claim no.6 of 2390531/2011, above)
17.	CG's, RL's & MW's actions relating to the secret meeting held discuss me on 20 July 2011: (see claim no.7 above)	14 July 2011 – end of my employment	CG, RL & MW	N/A	N/A	ss20 - ss23, s.13(1), s.15, s.15(1)(a), s27, s27(2), s26 & s.112(1) of the EA 2010 & Breach of the Human Rights Act 1998, including: Article 3 & 8	See claim no. 7 above	Hypothetical	3 ET claims brought in April, July & Dec 2010; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in no.s 1 - 11 of case no. 2375023/2011B & claim no.s 1 - 4 of this case	(See detriment(s) set out in claim no.7 of 2390531/2011, above)
18.	LBL's & CG's handling of my suspension/ the investigation process: (see claim no.8 above)	From 10 Aug	LBL, CG & Human resources	N/A	N/A	(See above-claim 15 – inc Article 3, 6, 8 & 10)	See claim no. 8 above	Hypothetical	(See protected acts no.14 above)	(See detriment(s) set out in claim no.8 of 2390531/2011, above)
19.	LBL's handling of the 3 rd OH process: (see claim no.9 above)	17 Oct - 23 Nov	LBL, HR & CG	N/A	N/A	(See above-claim 14) inc Article 3 & 8)	See claim no. 9 above	Hypothetical	(See protected acts no.14 above)	(See detriment(s) set out in claim no.9 of 2390531/2011, above)
20.	The alleged consequences of all these incidents of discrimination (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 9o & q & s, 20, 27, 32, 34, 38 – 40, 42, 44a, 44e, 45 - 46, 55, 56e & i, 62f & p, 64 - 65, 77c & 81 – 86 & covert recordings/transcriptions									

NB In relation to all three claims, as it is not possible to link a specific incident of discrimination to a specific protected act, (due to the fact that there are so many), the protected acts relied upon will include but not be limited to those referred to in the '**Protected act relied upon**' columns.

Ms AA Vaughan v London Borough of Lewisham and others

Case Number: 2302643/12

Protected Disclosures

No.	Date of disclosure(s)	Disclosure(s) made to	Method of disclosure(s)	Document	Location/witness	Breach	ET1 Paragraph(s)	Detriment
1.	(See disclosures 1 – 11: case no. 2375023/2011B & no.s 1- 3: case no.2390531/2011)	See previous	Written	By e-mail	N/A	<p>Protected disclosure: Failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974) Asserting my statutory rights & the failure to act in accordance with policy and procedure. Grievance/Complaint: Bullying, harassment and victimization (breach of contractual duties) & breaches of Article 3 & 8 PIDA Detriment: section 43B (1) (b), (d) & (f), of the ERA 1996). (LBL's attempt to conceal information about 43B (1) (b), (d). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises) & & breach of Article 3 & 8</p>	10, 12, 18 – 22, 88, 93, 93a, p & v	<p>The removal of my medical evidence from the trial bundle which put me at a disadvantage as a disable employee. . Breaches of Article 3 & 8</p> <p>Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011</p>
2.	(See previous 2 cases disclosures above) & 25 Oct, 27 Oct 2011 at 09.27	CG, BQ, JL, & Unison	Oral & Written	By e-mail & Letter	Laurence Hse-DB, JL, KH & COV REC N/A	<p>(As set out in breach 1 above) & inc LBL failed to ensure that timeframes for the investigation & my suspension from work were consistent with the principles of Article 3, 6 & 8 of the European Convention on Human Rights, which, broadly speaking, sets out the framework of the rights to a fair trial. PIDA Detriment: (As set out in breach 1 above) & breach of Article 6; (except for LBL's attempt to conceal information about 43B (1) (b), (d)) & breach of Article 3, 6 & 8</p>	8e – f, 23 – 25, 75, 82 – 83, 88, 93, 93i & 98	<p>LBL's failure to bring my suspension/the investigation to a timely & fair close after my request in (<i>October 2011-corrected date</i>) that this be done (which resulted in the unnecessary detrimentally impact to my health, wellbeing & reputation- CG's investigation, took too long). . Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 above</p>

3.	(See previous 2 cases disclosure s above), no. 2 of this case above & 04 Nov at 08.30 & 10 Nov 2011 at 16.07	CG, JL & Unison	Written	By e-mail		(As set out in breach 1 above) & inc complaint about Dr W & CG: Bullying, harassment and victimization (breach of contractual duties). Dr W's breach of my confidentiality/ Failure to safeguard my confidential, sensitive personal information, as required by Data Protection Act 1998; & dishonest conduct- false/defamatory allegations & breach of Article 3 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of Article 3 & 8	8e, 9- 22, 61, 67, 84, 88, 93, 93j, p & t	The continued abuse OH process etc & using it as a tool for intimidation (particularly the third referral & CG's and Dr.W's role in this); a) the delay in making the referral from 17 Oct 2011, the persistent questioning of me in relation to my request to be seen by an OH consultant in London, the nature of the referral (inaccurate information & personal comments made etc) & her/LBL's failure to provide Dr.W with sufficient information/documentation & the suppression of my medical records/evidence, LBL's & Dr.W's failure to make every effort to gather information about my medical condition through various channels, i.e legal representatives etc & b) the unreasonable length of the OH consultation & the manner in which it was conducted (i.e. the nature of the questioning & Dr.W's breach of confidentiality- discussing my condition with TD when I left the room) & LBL's failure to adequately investigate my related complaint against Dr.W 'in good time'. Breaches of Article 3 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 2 above
4.	(See previous 2 cases disclosure s above), no. 2 - 3 of this case above & 1 & 4 Nov 2011 15 Nov at 13.07 & 23 Nov at 10.01 & 10.43 & 24 Nov at 10.47, 25 Nov at 13.46, 26 Nov at	CG, KH, JL, CM CG, JL, HR, Unison	Oral Written	Questions & Answers By e-mail & Letter	Lewisham Town Hall & COV REC	(As set out in breach 1 above) & inc Grievance/complaint about CG: Bullying, harassment and victimization (breach of contractual duties). LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 3, 6 & 8 PIDA Detriment: (As set out in breach 1 above) except for LBL's attempt to conceal information about 43B (1) (b), (d) & breach of Article 3, 6 & 8	22, 44- 46, 86, 88, 93, 93b,	LBL's handling of my complaints about CG: a) Its decision to appoint its lawyers to deal with the matter & the lawyer's persistent conduct with regards to copying CG into the correspondence regarding my complaints about her & b) LBL's failure to remove CG as the investigating officer. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 3 above

	19.49, 29 Nov 2011		Oral	Medical Info for OH Dr	Lewisham Town Hall- TD & COV REC N/A			
	& 29 Nov 2011 at 21.07	BQ, JL, DR.W, HR & Unison	Written	E-mail				
5.	(See previous 2 cases disclosure s above), no. 2 - 4 of this case above & 30 Nov at 13.25, 4 Dec at 19.03 & 20.08 & 5 Dec at 12.19	CG, JL & HR, RL, Unison & BQ	Written	By e- mail & Letter	N/A	(As set out in breach 1 above) & inc Grievance/complaint about CG: Bullying, harassment and victimization (breach of contractual duties). Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 6 PIDA Detriment: (As set out in breach 1 above) except for LBL's attempt to conceal information about 43B (1) (b), (d) & breach of Article 3, 6 & 8	24 – 25, 48, 52 – 53, 85, 87 – 88, 93, 93d & 94	LBL's/ CG's failure to set out the 'charges' against me in LBL's notification letter regarding the SOSR hearing & the delay/failure to do so following my request for this information on 13 December 2011. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 4 above
6.	(See previous 2 cases disclosure s above), no. 2 - 5 of this case above & 09 Dec at 07.05 & 15.40, 12 Dec at	FM, SP, KN, BQ, CD, JB, HR, JL, DP FS, HR &	Written Written	By e- mail, Letter & OH Report By e-	N/A N/A	(As set out in breach 1 above) & inc failure to address my complaint/Grievance about management & Dr.W: Bullying, harassment and victimization (breach of contractual duties). Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 6 & 8 PIDA Detriment: (As set out in breach 1 above) & Breach of Article 3, 6 & 8	32 – 34, 37, 39, 46, 62 – 63, 88, 93, 93e, k & j	LBL's handling of Misconduct/Discrimination allegations: a) FS & BQ's failure to respond to direct correspondence from me & take all reasonable steps to protect me from bullying, harassment & victimisation/ investigate my allegations of alleged 'misconduct/corruption in public office & b) LBL's failure to investigate my grievance against CG & Dr.W's at the relevant time, following receipt of this in (<i>Nov/Dec 2011- correction</i>) & making the assumption that I would want to attend a grievance hearing. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 5 above

	16.31, 13 Dec at 08.07, 12.34 & 21.02 20 January 2012 at 16.21 & 18.25 & 24 Feb 2012 at 20.14	JL, SP, DP, FM CL, JL & Unison BQ, FS & Unison	Written Written	mail By e-mail By e-mail & 2 attachments- as sent on 17 at 5.40	N/A N/A			
7.	(See previous 2 cases disclosures above), no. 2 - 6 of this case above & 4 Feb at 09.16, 6 Feb at 13.56	CG, CL, JL, Unison, RW	Written	By e-mail	N/A	(As set out in breach 1 above) & inc failure act in accordance with policies and procedures; failure to reach a reasonable conclusions & inaccurate/false findings made; Asserting my statutory rights & breach of Article 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights.	27 – 32, 38, 47, 88, 93 & 93r	LBL's handling of the provision of the SOSR bundle and my request for adjustments for the SOSR Hearing: a) LBL's failure to provide the paperwork/evidence that LBL would be relying on at the hearing by the agreed time- the failure to provide me with the full bundle of evidence by the agreed date and 'in good time' before the SOSR hearing (including expecting me to stay at home to receive couriered packages with no warning, the delay in providing the investigation interview notes/questions) & its continued failure since to keep/provide accurate notes/minutes for the meetings/interviews that I attended (in terms of absent content, misinterpretations, false accounts & publishing statements I have not made/were not made by others etc) & b) the refusal to allow my friend who accompanied me to the SOSR hearing to advocate on my behalf. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 6 above
8.	(See previous 2 cases disclosures above), no. 2 - 7 of	CG, JL,	Written	E-mail		Protected disclosure: Asserting my statutory rights; PIDA Detriment: section 43B (1) (b) (d), (f) of the ERA 1996) & LBL's attempt to conceal information about 43B	26, 88, 93 & 93h	LBL's failure to provide me with the Equality form questionnaire response 'in good time' and/or at all following the requirement to do so. Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 7 above

	this case above & 8 Feb at 15.01, 10 Feb at 09.28 & 10.54, 13 Feb at 10.19 & 10.45	CL & Unison, GMB, RW, FS & BQ				(1) (b), (d).		
9.	(See previous 2 cases disclosure s above), no. 2 - 8 of this case above & 13 Feb at 17.42, 14 Feb at 11.06, 15 Feb at 8.18, 16 Feb at 15.46, 17 Feb at 5.40	CG, JL, CL, Unison, RW, HR, FS & BQ	Written	E-mail & 2 attachm ents- VG Statem ent & CR Docs- Complai nt about VG		(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time; failure to reach a reasonable conclusions; breach of my confidentiality; defamation & breach of Article 3, 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights.	33, 37, 44, 88, 93, 93n & q	LBL's decisions regarding the SOSR hearing: a) The decision to progress with the SOSR hearing instead of stopping proceedings as soon as RW, BQ and FS had in their possession the evidence which supported the fact the allegations against me were false & the evidence fabricated/falsified & b) LBL's handling of the arrangements for the SOSR hearing- the decision to employ the services of a note taker from an outside agency. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 8 above
10.	(See previous 2 cases disclosure s above), no. 2 - 9 of this case above & 17 Feb at 11.32, 21 Feb 2012 at 14.44, 14.47,	FS, BW, CL, JL, HR & Unison CM, JL, Unison, BQ, FS, HR & DP	Written	E-mail & 5 PDF attachm ents- Claiman		(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time; defamation & breach of Article 3, 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights.	8f, 39, 44, 48 – 49, 51, 54, 56 – 57, 68 – 69, 72, 75 – 78, 82, 84, 87, 88, 93, 93o, s & 94	The allegations made by ES, VG, KP & other staff, (directly and indirectly inferred against me during the internal investigation/hearing process), including the perceptions: constituting both libellous & slanderous defamation of character. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 9 above

	14.51, 14.56, 22 Feb at 22.17 & 27 & 28 Feb & 6 March 2012	RW, EH, CG, VG, ES, CT, KP	Oral & Written	t SOSR Bundle	Lewisham Town Hall & Laurence Hse-TD & COV REC N/A			
11.	(See previous 2 cases disclosures above), no. 2 - 10 of this case above & 27 Feb at 06.23, 28 Feb at 4.46 & 7.44 3 March 6 March 2012	CM, FS, KN, EH & Unison EH, FS & KN RW, EH, CG, VG, ES, CT, KP	Oral & Written	E-mail & 4 attachments E-mail & 4 attachments-	Lewisham Town Hall - TD & COV REC N/A	(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time; defamation; failure to reach a reasonable conclusions & inaccurate/false findings made & breach of Article 3, 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights	40 – 57, 59 – 61, 68 – 78, 80 – 82, 85 – 90, 93, 93s,	The failure to conduct a proper, fair & impartial hearing & reach a 'reasonable' conclusion -the erroneous findings made by the hearing officer/the continued discriminatory handling of unsubstantiated allegations: including a) fully exploring and understanding the issues, making impartial decisions, appropriately hold systems & people to account for issues & failures and reasonably addressing issues satisfactorily; b) The unreasonable construction of the SOSR hearing (conducted like a disciplinary hearing) & the questions posed; I was treated less favourably, intimidated and harassed; I was kept waiting for an unreasonable amount of time during breaks; Undue weight was applied to the subjective verbal word of ES, VG and CG -there was also proof that these individuals had fabricated/falsified evidence against me but no attempt was made to question them about this & I was prevented from asking questions about this etc. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 10 above
12.	(See previous 2 cases disclosures above) & no. 2 - 11	See previous	See previous	See previous	See previous	(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time; defamation; failure to reach a reasonable conclusions & inaccurate/false findings made & breach of Article 3, 6 & 8	34 – 36, 62 – 65, 67, 88, 93, 93g, k, t & u	LBL's conduct in relation to the handling of my grievances hearing & grievance outcome & SOSR outcome: a) The failure to hold the grievances 'in good time' after the SOSR hearing; the decision to allow RW to hear the grievances alone, rather than appoint a panel (& LBL's previous failures to do this- not constituted in line

	of this case above					PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights		with the applicable policy) & b) the failure to investigate all my grievances properly and reach a reasonable conclusion & the decision to provide the outcome of the SOSR & the grievances at the same time &) LBL's failure to provide me with the minutes to the SOSR hearing & grievances 'in good time' and/or at all following the requirement to do so. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 11 above
13.	(See previous 2 cases disclosure s above) & no. 2 - 11 of this case above	See previous	See previous	See previous	See previous	(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights	4- 7, 66, 75, 88, 93 & 93v,	The conduct of LBL in relation to suppressing the evidence which was disclosed to me on 5 April 2012 & the impact that this had on me (putting me at a disadvantage as a disabled employee & discriminating against me. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 12 above
14.	(See previous 2 cases disclosure s above) & no. 2 - 11 of this case above	See previous	See previous	See previous	See previous	(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights	22, 24, 34 - 36, 38 - 53, 57, 59-63, 65, 67 - 68, 71 - 73, 76 – 78, 81, 84 - 85, 87-90, 93, 93j, k, m, s, t & u & 94	LBL's failure to invoke/implement/follow the correct policies & procedures (sickness absence, grievance, capability & disciplinary etc) efficiently & effectively: a) LBL's failure to comply with its own policies, inc – not putting in place panels to hear my grievances/not constituted in line with the applicable policy & LBL's failure to comply with several stages of the Statutory Disciplinary and Capability Procedure and poor procedures were followed; b) LBL failure to use any official verbal/written warnings, there is no evidence of this or details of any improvement notice including how any "conduct" and/or "capability" will be <u>objectively</u> measured and recorded. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosure no.s 1 - 13 above
15.	The alleged consequences of all these detriments (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 33, 39, 44, 49c, 51, 55, 59, 61, 62, 66, 68, 75, 78, 82, 84, 90, 93e & i, 96 – 100 & covert recordings/transcriptions							

No.	Incident	Date	Person(s) Responsible	Location	Witness	Type of Discrimination	ET Paragraph(s)	Comparator	Protected act relied upon	Detriment
16.	The conduct of LBL & its representatives with regards to the removal of my medical evidence from the trial bundle (see claim no.1 above).	From 14 Oct 2011	LBL	N/A	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3 & 8	See claim no. 1 above	N/A or hypothetical	5 ET claims brought in April, July, Dec 2010, Aug 2011 & Nov 2011; Equality form questionnaire & follow up letter dated 3 Oct; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in case no. s 2375023/2011B & 2390531/2011	(See detriment(s) set out in claim no.1 of 2302643/12, above)
17.	LBL's failure to bring my suspension/the investigation to a timely and fair close (see claim no.2 above).	From Nov 2011	LBL & CG	N/A	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 2 above	N/A or hypothetical	As set out above; 2 nd Equality form questionnaire & follow up letter dated 10 Jan 2012; E-mails/Notes/Letters/meetings set out in no. 2 of this case	(See detriment(s) set out in claim no.2 of 2302643/12, above)
18.	The continued abuse of the OH process etc (see claim no.3 above).	From 17 Oct 2011 – 22 March 2012	LBL, CG & Dr.W	Town Hall	TD	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 3 above	N/A or hypothetical	As set out in claim 17 above, giving evidence against LBL at ET in Jan/Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 3 of this case	(See detriment(s) set out in claim no.3 of 2302643/12, above)
19.	LBL's handling of my complaints about CG (see claim no.4 above).	From 8 Dec 2011 – 6 March 2012	LBL, RL, FS, BQ & RW	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010&	See claim no. 4 above	N/A or hypothetical	As set out in claim 17 above giving evidence against LBL at ET in Jan/Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2	(See detriment(s) set out in claim no.4 of 2302643/12, above)

						breach of Article 3, 6 & 8			- 4 of this case	
20.	LBL's/Christine Grice's failure to set out the 'charges' against me (see claim no.5 above).	From 8 Dec 2011	LBL & CG	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 5 above	N/A or hypothetical	As set out in claim 17 above giving evidence against LBL at ET in Jan/Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 - 5 of this case	(See detriment(s) set out in claim no.5 of 2302643/12, above)
21.	LBL's handling of Misconduct/Discrimination allegations (see claim no.6 above).	From 12 Dec 2011	LBL, FS & BQ	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 6 above	N/A or hypothetical	As set out in claim 17 above, giving evidence against LBL at ET in Jan/Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 - 6 of this case	(See detriment(s) set out in claim no.6 of 2302643/12, above)
22.	LBL's handling of the provision of the SOSR bundle and my request for adjustments for the SOSR hearing (see claim no.7 above).	From 1st week in Jan 2012 - 27 Feb 2012 & on 27 & 28 Feb & 6 Mar 2012	LBL, Human resources & CG	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 7 above	N/A or hypothetical	As set out in claim 17 above, giving evidence against LBL at ET in Jan/Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 - 7 of this case	(See detriment(s) set out in claim no.7 of 2302643/12, above)
23.	LBL's failure to provide me with the Equality form questionnaire response 'in good time' and/or at all following the requirement to do so (see claim no.8, above).	From 31 Jan 2012	LBL	N/A	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010	See claim no. 8 above	N/A or hypothetical	As set out in claim 17 above & lodged EAT appeal on 12 March 2012, 6 th , 7 th & 8 th ET claims, Appeal at EAT in Jan 2012, giving evidence against LBL	(See detriment(s) set out in claim no.8 of 2302643/12, above)

									at ET in Jan & Feb 2012, request for review of ET decision on 3 March 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 8 of this case	
24.	LBL's decisions regarding the SOSR hearing (see claim no.9, above).	From 21 Feb 2012 & on 17 Feb 2012	LBL, RW, FS & BQ	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 9 above	N/A or hypothetical	As set out in claim 17 above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 9 of this case	(See detriment(s) set out in claim no.9 of 2302643/12, above)
25.	The allegations made by Elaine Smith, Valerie Gonslaves & other staff, (directly and indirectly inferred against me during the internal (see claim no.10, above).	27, 28 Feb & 6 Mar 2012 & references to LBL SOSR bundle	ES, CG, KP, CT, NL, NF, CG		TD, Note taker etc	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 10 above	N/A or hypothetical	As set out in claim 17 above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 10 of this case	(See detriment(s) set out in claim no.10 of 2302643/12, above)
26.	The failure to conduct a proper, fair & impartial hearing & reach a 'reasonable' conclusion -the erroneous findings made by the hearing officer/the continued discriminatory handling of unsubstantiated allegations: (see claim no.11, above).	27, 28 Feb & 6 Mar 2012	LBL, RW, EH & CG	Laurence Hse and Town Hall	TD, Note taker etc	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no.11 above	N/A or hypothetical	As set out in claim 17 above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012, request for review of ET decision on 3 March 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 11 of this case	(See detriment(s) set out in claim no.11 of 2302643/12, above)
27.	LBL's conduct in relation to the handling of my grievances hearing & grievance outcome & SOSR outcome (see claim no.12, above).	From 6 Mar & on 22 Mar 2012	LBL, RW, EH & CG	Laurence Hse and Town Hall &	Note taker	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 &	See claim no. 12 above	N/A or hypothetical	As set out in claim 17 above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012, request for	(See detriment(s) set out in claim no.12 of 2302643/12, above)

				e-mail		breach of Article 3, 6 & 8			review of ET decision on 3 March 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 12 of this case	
29.	The conduct of LBL in relation to suppressing the evidence which was disclosed to me on 5 April 2012 (see claim no. 13, above).	From 1 April 2011 - 5 April 2012	LBL, Human resources & EH	Laurence Hse	TD, Note taker etc	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 13 above	N/A or hypothetical	As set out in claim 17 above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012, request for review of ET decision on 3 March 2012, equality form questionnaire follow up letter dated 6 April 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 13 of this case	(See detriment(s) set out in claim no.13 of 2302643/12, above)
30.	LBL's failure to invoke/implement/follow the correct policies & procedures (sickness absence, grievance, capability & disciplinary etc) efficiently & effectively (see claim no. 14, above).	From 1 April 2011 - 13 April 2012	LBL, FS, BQ & Human resources	N/A	TD, JL	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3, 6 & 8	See claim no. 14 above	N/A or hypothetical	As set out in claim 17 above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012, request for review of ET decision on 3 March 2012, equality form questionnaire follow up letter dated 6 April 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 14 of this case	(See detriment(s) set out in claim no.14 of 2302643/12, above)
<p>31. The alleged consequences of all these incidents of discrimination (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 33, 39, 44, 49c, 51, 55, 59, 61, 62, 66, 68, 75, 78, 82, 84, 90, 93e & i, 96 – 100 & covert recordings/transcriptions</p>										

NB In relation to all three claims, as it is not possible to link a specific incident of discrimination to a specific protected act, (due to the fact that there are so many), the protected acts relied upon will include but not be limited to those referred to in the 'Protected act relied upon' columns.

Ms AA Vaughan v London Borough of Lewisham and others

Case Number: 2302645/12

Protected Disclosures

No.	Date of disclosure(s)	Disclosure(s) made to	Method of disclosure(s)	Document	Location/witness	Breach	ET1 Paragraph(s)	Detriment
1.	See all previous cases disclosure s above- <u>not</u> claim 2302643/12	See previous	Written	By e-mail	N/A	(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 3 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3 & 8 rights	10 – 12, 86, 88, 88a & 98	The conduct of LBL in relation to the reference made to reserve its right to make a 'safeguarding referral' & implied breach of duty- as a means to intimidate/threaten me. Breaches of Article 3 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011
2.	See all previous cases disclosure s above	See previous	Written	By e-mail	N/A	(As set out in breach 1 above) & inc. Asserting my statutory rights; LBL's failure to act in accordance with policies and procedures & address the issues at the relevant time & breach of Article 3, 6 & 8 PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights	49 – 85, 86, 88, 88c, 89 – 92 & 98d	The decision to dismiss me. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in claim no.s 1 - 9 in case no. 2390531/2011 & disclosures in claim no. 2302643/12
<p>3. The alleged consequences of all these detriments (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 5, 10 - 12, 18, 22, 27, 32c, 34, 37 - 38, 42, 44 - 45, 49, 52 - 53, 60, 63, 67 – 68, 75, 85, 88a – b, 91 & 93 – 98 & covert recordings/transcriptions</p>								

No.	Incident	Date	Person(s) Responsible	Location	Witness	Type of Discrimination	ET Paragraph(s)	Comparator	Protected act relied upon	Detriment
4.	The conduct of LBL in relation to the reference made to reserving its right to make a 'safeguarding referral' & implied breach of duty- as a means to intimidate/threaten me	22 Nov 2011 & 13 Dec 2011	LBL	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3 & 8	10 – 12, 86, 88, 88a & 98	N/A or hypothetical	5 ET claims brought in April, July, Dec 2010, Aug 2011 & Nov 2011; two Equality form questionnaires & follow up letter dated 3 Oct; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in case no. s 2375023/2011B & 2390531/2011	<i>(See detriment(s) set out in claim no.1 of 2302645/12, above)</i>
5.	The decision to dismiss me	5 April 2012	RW/LBL	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & unfair dismissal under sections 1 & 98 of the ERA & breach of Article 3, 6 & 8		N/A or hypothetical	As set out above & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012, request for review of ET decision on 3 March 2012, equality form questionnaire follow up letter dated 6 April 2012 & E-mails/Notes/Letters/meetings set out in no. s 2 – 14 of claim no. 2302643/12	<i>(See detriment(s) set out in claim no.2 of 2302645/12, above)</i>
<p>6. The alleged consequences of all these incidents of discrimination (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, debarment from future employment etc, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 5, 10 - 12, 18, 22, 27, 32c, 34, 37 - 38, 42, 44 - 45, 49, 52 - 53, 60, 63, 67 – 68, 75, 85, 88a – b, 91 & 93 – 98 & covert recordings/transcriptions</p>										

NB In relation to all three claims, as it is not possible to link a specific incident of discrimination to a specific protected act, (due to the fact that there are so many), the protected acts relied upon will include but not be limited to those referred to in the '**Protected act relied upon**' columns.

Ms AA Vaughan v London Borough of Lewisham and others

Case Number: 2313031/2012A

Protected Disclosures

No.	Date of disclosure(s)	Disclosure(s) made to	Method of disclosure(s)	Document	Location/witness	Breach	ET1 Paragraph(s)	Detriment
1.	See all previous cases disclosure s above- not claim 2302643/1 2	See previous	See previous	See previous, E-mail & COV REC & Transcripts	See previous	<p>Protected disclosure: Failure to provide a safe place of work & maintain a safe system of working- Breach of contractual duties (including mental and physical health, as required by the UK Health and Safety at Work Act 1974) Asserting my statutory rights & the failure to act in accordance with policy and procedure & address the issues at the relevant time Grievances/Complaints: Bullying, harassment and victimization (breach of contractual duties) & breaches of human rights PIDA Detriment: section 43B (1) (b), (d) & (f), of the ERA 1996). (LBL's attempt to conceal information about 43B (1) (b), (d). Section 100(1)(d) of the Employment Rights Act (1996) applies in that the circumstances of danger applied to any danger, including that of harassment by a fellow worker, not just physical dangers relating to work premises) & breach of Article 3, 6 & 8</p>	5, 7, 12, 13, 14, 15, 18, 20, 21, 23, 24 & 30, 60	<p>EH's specific actions regarding her handling of my employee information: Including a) when I transferred from CEL in April 2011 & the SOSR process/hearing during February – April 2012 & her failure to disclose to me the fact that she had received information regarding my disability by CEL's/Babcock's representative at the relevant time (March/April 2011) & b) her failure to do so again for over a year & during the SOSR hearings in February/March 2012, when the matter was raised in her presence. She wilfully suppressed this evidence, as did LBL. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B & disclosures in case no. 2390531/2011</p>
2.	See all previous cases disclosure s above- inc claims 2302643/1 2 & 2302645/1 2 & 5, 10 & 11 (at 21.26	See previous & KS, EH & FS	See previous & Written	See previous, E-mail & COV REC & Transcripts	See previous & N/A, TD, COV REC	<p>(As set out in breach 1 above) PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3, 6 & 8 rights</p>	5 - 17, 19f, 20, 21, 24, 30, 30d, 34 – 52, 54 – 77, 79 – 80, 87	<p>EH's, RW's, FS's & BQ's conduct regarding the defamatory allegations about me by management: a) including RW's & EH's decision to allow CG to publicise what he knew to be defamatory statements about me & slander me & b) RW's subsequent decision to publicise (inside and/or outside LBL, which have been transmitted and /or published both verbally and in writing) what he knew to be defamatory statements about me and FS & BQ decision to allow RW and/or CG, to publicise what they knew to be defamatory statements about me and slander me and their subsequent decision to publicise</p>

	& 15.36) April 2012							(inside and/or outside Lewisham) what they knew to be defamatory statements about me. The respondents publicly defamed me, slandering me & calling my good character into question. I equate the experience with inhumane & degrading treatment- Article 3) & it caused damage to my reputation/debarment from future employment etc. Breaches of Article 3, 6 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B , disclosures in case no. 2390531/2011, disclosures in claim no. 2302643/12 & 2302645/12
3.	See all previous cases disclosure s above	See previous	See previous	See previous	See previous	(As set out in breach 1 above) PIDA Detriment: (As set out in breach 1 above) & breach of my Article 3 & 8 rights	19a - e, 20, 21, 23, 24, 30a- d, 81 – 84, 87- 88	LBL's post-employment conduct: including a) the decision to instruct it representatives to demand that I should be put to proof of my disability & its effects, when it has had access to this information since September 2011, the delay in providing me with a 'statement of earnings' & informing DWP that there was no record of my sickness absence, after it had received information that I had been signed off sick from me; and b) the delay and/or failure in paying my final salary correctly (including notice pay and holiday pay) & the way in which it handled my concerns regarding the failure and/or delay in paying my final salary correctly. I equate the experience with inhumane & degrading treatment- Article 3. Breaches of Article 3 & 8 Also relates to disclosure(s) 1 - 11 in case no. 2375023/2011B, disclosures in case no. 2390531/2011, disclosures in claim no. 2302643/12 & 2302645/12
<p>4. The alleged consequences of all these detriments (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, debarment from future employment etc, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 7 - 10, 12 - 13, 15 – 17, 19a- f, 23, 25 – 30, 34 - 88 & covert recordings/transcriptions</p>								

No.	Incident	Date	Person(s) Responsible	Location	Witness	Type of Discrimination	ET Paragraph(s)	Comparator	Protected act relied upon	Detriment
5.	EH's specific actions regarding her handling of my employee information: (see claim no.1 above).	From 1 April 2011 – 13 April 2012	EH & LBL	Via e-mail	N/A	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & breach of Article 3 & 8	See claim no. 1 above	N/A or hypothetical	5 ET claims brought in April, July, Dec 2010, Aug 2011 & Nov 2011; two Equality form questionnaires & follow up letter dated 3 Oct 2011; & Appeal at EAT in Jan 2012, giving evidence against LBL at ET in Jan & Feb 2012; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in case no. s 2375023/2011B & 2390531/2011	(See detriment(s) set out in claim no.1 of 2313031/2012A, above)
6.	EH's, RW's, FS's & BQ's conduct regarding the defamatory allegations about me by management: (see claim no.2 above).	From February 2012-on-going	EH, RW, FS, BQ/LBL	N/A & Town Hall & Laurence Hse	See previous, TD, COV REC	Unlawful disability discrimination contrary to s.111-s.13, s.15, ss20 - ss23, s26- s27 of the EA 2010 & unfair dismissal under sections 1 & 98 of the ERA & breach of Article 3, 6 & 8	See claim no. 2 above	N/A or hypothetical	As set out above & 2 ET claims brought in April 2012; 3rd Equality form questionnaire dated 6 April 2012 & follow up letters for previous questionnaire dated 6 April 2012; allegations that would amount to a contravention of the EA 2010; E-mails/Notes/Letters/meetings set out in case no. s 2375023/2011B, 2390531/2011 2302643/12 & 2302645/12 & LBL's knowledge that I would be giving evidence at	(See detriment(s) set out in claim no.2 of 2313031/2012A, above)

									PHR on 19 & 20 April 2012	
8.	LBL's post-employment conduct: (see claim no.4 above).	From 13 April 2012 – on-going	LBL	N/A	N/A	As above	See claim no. 4 above		As set out above	(See detriment(s) set out in claim no.4 of 2313031/2012A, above)

9. The alleged consequences of all these incidents of discrimination (which are continuing acts) are that I suffered injury to feelings, change in personality, strain on personal relationships, effect on future employment (i.e. stigma and future health in relation to future loss of earnings), damage to my reputation, debarment from future employment etc, injury to health (i.e. stress related severe depression, panic attacks, insomnia, eating difficulties and muscle spasms/weakness in arm and the exacerbation of my pre-existing condition- hypertension) and aggravated/exemplary/stigma damages because my complaints of discrimination were handled were in a high-handed, insulting and oppressive, arbitrary and an unconstitutional manner by the agents of government. There was the very worst kind of abuse of executive power by the servants of government. It extended to the maintenance by the Respondent of false allegations against me. These consequences are also themselves alleged to be detriments, as set out in paragraphs 7 - 10, 12 - 13, 15 – 17, 19a- f, 23, 25 – 30, 34 - 88 & covert recordings/transcriptions

NB In relation to all three claims, as it is not possible to link a specific incident of discrimination to a specific protected act, (due to the fact that there are so many), the protected acts relied upon will include but not be limited to those referred to in the '**Protected act relied upon**' columns.