

- 1) Made on behalf of the Claimants
- 2) SJ Garraty
- 3) First Witness Statement
- 4) Exhibit SJG1
- 5) Dated 22 October 2025

CLAIM NO: M10SE015

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
IN THE SHEFFIELD DISTRICT REGISTRY**

BETWEEN

(1) SHEFFIELD ENVIRONMENTAL SERVICES LIMITED

(2) VEOLIA ES SHEFFIELD LIMITED

(3) VEOLIA ES (UK) LIMITED

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF SOPHIE JOY GARRATY

I, Sophie Joy Garraty of Veolia ES (UK) Limited, 210 Pentonville Road, London, N1 9JY, will say as follows:

SECTION A: INTRODUCTION

1. I am a Senior Employee Relations Specialist, sitting within the Human Resources team at Veolia ES (UK) Limited ("Veolia UK"). I have been in this role since 12 December 2022 and the geographical remit of my role is UK-wide. In my current role, I have responsibility for managing Veolia's relationships with trade unions such as GMB Union and Unite the Union ("Unite").
2. By reason of my employment, I have been involved in the underlying matters that led to the Claimants obtaining the injunction against the Defendants which was granted by order of Mrs Justice Stacey on 13 June 2025 (the "Injunction Order"), and I am involved in the matters relating to notification, monitoring, and enforcement of the Injunction Order.
3. I am duly authorised by the Claimants to make this witness statement on behalf of the Claimants in support of their application for an extension of the Injunction Order (the "Injunction Extension Application").
4. I have had sight of the documents that were filed by the Claimants in support of the injunction application including the First Witness Statement of Elizabeth Johnson dated 4 June 2025 ("Johnson 1") and I adopt the terms defined in that statement, and the Second Witness Statement of Robert Allen dated 13 June 2025 which set out matters relating to the legality of the strike action conducted by Unite and details of the relevant ballots for industrial action held by Unite ("Allen 2").
5. The facts and matters to which I refer in this witness statement are true to the best of my knowledge, information and belief. Where I rely upon others or documents as the source of my knowledge, I set out the source of that information, which is also true to the best of my knowledge, information and belief.
6. This statement has been prepared for me by the solicitors for the Claimants, Simmons & Simmons LLP ("S&S"), through the exchange of emails and videoconferencing meetings between me and S&S. In making this

statement I do not intend to waive privilege in any respect and I am not authorised by the Claimants to do so.

7. I exhibit to this statement a paginated bundle of documents marked “**SJG1**” to which I shall refer in the course of this statement. References in this statement in the form **[SJG1/[•]]** are to pages of Exhibit SJG1.
8. My statement is structured into the following sections (this introduction being Section A):
 - (A) Section B: Notification of the Injunction Order and other documents;
 - (B) Section C: Events since the injunction hearing up to July mass picket;
 - (C) Section D: Interactions with the police;
 - (D) Section E: Monitoring the injunction;
 - (E) Section F: Update on the legal status of the pickets; and
 - (F) Section G: Duty of full and frank disclosure.

SECTION B: NOTIFICATION OF THE INJUNCTION ORDER AND OTHER DOCUMENTS

9. I understand that Mr Allen is providing a third witness statement dated 22 October 2025 (“Allen 3”) which addresses the notification requirements in the Injunction Order at paragraph 17 and steps taken to notify the Injunction Order at paragraph 21, and I adopt the terms as defined in Allen 3. On 13 June 2025, S&S provided me with copies of the Warning Notices in A2 and the Injunction Order in A4 at each of the sites marked “x” on the Plans 1 to 5 of the Injunction Order (in accordance with paragraphs 9(c) and 9(d) of the Injunction Order). As these were received after close of business on 13 June 2025, I made arrangements on the following working day, on Monday 16 June 2025, for these documents to be put at the relevant sites.

10. I tasked Terry Clements, Administration Manager at Veolia, with coordinating the setting up of the Injunction Order and the Warning Notices at the relevant sites and to send me photographs once completed.
11. Terry Clements confirmed to me that whilst the majority of the Warning Notices and Injunction Orders were put up at the relevant sites on 16 June 2025, and photographs of the same were sent to me, regrettably, there were some oversights in the process. However, Terry Clements has confirmed to me that all of the relevant documents were affixed at the sites, with the exception of the Warning Notice and the Injunction Order at the entrance to the Workshop on Lumley Street ("Workshop Entrance"), and I was provided with photographs for some, but not all, of the documents that were affixed on 16 June 2025. I apologise to the court on behalf of the Claimants for the error.
12. By way of further explanation:
 - (A) I was sent photographs which show that the Warning Notices and the Injunction Order were put up at the relevant sites on 16 June 2025, with the exception of:
 - (1) The Injunction Order at the Lumley Street Depot;
 - (2) The Warning Notice and the Injunction Order at the Workshop Entrance;
 - (3) The Warning Notice and the Injunction Order at the exit to the ERF ("ERF Exit"); and
 - (4) The Injunction Order at Beighton.
 - (B) During the first round of monitoring of the Injunction Order and Warning Notices, I was sent photographs which show that both the Warning Notice and the Injunction Order were affixed at the ERF Exit, and that the Injunction Order was affixed at Beighton. However,

I had to ask that Simon Collins, a Transport Manager¹ at Veolia, to provide me with a photograph of the Injunction Order at the Lumley Street Depot (which I received on 14 July 2025), and for a photograph of the Warning Notice at the Workshop Entrance (which I also received on 14 July 2025).

(C) Regrettably, there was a further oversight in that an order dated 6 June 2025 (the “6 June Order”) that had previously been affixed to the Workshop Entrance appears to have been confused with the Injunction Order. This issue was only rectified on 16 August 2025 when I arranged for a copy of the Injunction Order that had been resealed by the Court to be affixed at the sites **[SJG1/5]**.

13. I subsequently arranged for the Warning Notice at the Lumley Street Depot to be moved closer to the street, which was completed on 19 June 2025.

14. I set out below a table of the relevant sites (in the rows), with the date that I can confirm that the relevant document was affixed at the relevant site (in the columns), and references to an image of the document as at the relevant date contained in my exhibit.

Relevant site	Warning Notice	Order
Lumley Street Depot	16 June 2025 [SJG1/6]	16 June (but the earliest image is 14 July 2025) [SJG1/7]
Workshop Entrance	14 July 2025 [SJG1/8]	16 August 2025 [SJG1/5]

¹ Simon Collins was promoted from a Driver Trainer to Transport Manager and the promotion was backdated to 1 July 2025.

Relevant site	Warning Notice	Order
Exit to the Workshop on Worthing Road (“ <u>Workshop Exit</u> ”)	16 June 2025 [SJG1/9]	16 June 2025 [SJG1/9]
Entrance to the ERF (“ <u>ERF Entrance</u> ”)	16 June 2025 [SJG1/10]	16 June 2025 [SJG1/10]
ERF Exit	16 June 2025 (but the earliest image is 2 July 2025) [SJG1/11]	16 June 2025 (but the earliest image is 2 July 2025) [SJG1/12]
Entrance to Tinsley Park Road (“ <u>Tinsley Park Road Entrance</u> ”)	16 June 2025 [SJG1/13]	16 June 2025 [SJG1/14]
Exit to Tinsley Park Road (“ <u>Tinsley Park Road Exit</u> ”)	16 June 2025 [SJG1/15]	16 June 2025 [SJG1/15]
Beighton	16 June 2025 [SJG1/16]	16 June 2025 (but the earliest image is 4 July 2025) [SJG1/17]

SECTION C: EVENTS SINCE THE INJUNCTION HEARING UP TO JULY MASS PICKET

15. In this section I set out a narrative of the direct action that took place between the Injunction Order being granted and 8 July 2025. I understand that my colleague, Dean Anthony Ford, is giving a witness statement dated 22 October 2025 (“Ford 1”) which covers direct action that has taken place after 8 July 2025 at Sections C, D and E.

16. On 17 June 2025, three individuals protested at the private property line painted in yellow at the Lumley Street Depot. I did not observe this as I was not present. However, I received an email from my colleague, Nick O'Neill, at the time of the event telling me what was happening, and then I called him back **[SJG1/18-19]**.
17. None of the individuals were wearing masks. I know that one of them was a man called Joseph Diviney. Joseph Diviney was wearing a light brown jacket and is circled in red in Image 1 below and in the images in my exhibit **[SJG1/23; 24; 27]**. I know that one of the other men is called 'Dave' and goes by the name of 'DonkeyDave269' on YouTube because I have seen his videos of the 17 June 2025 that he has uploaded to YouTube (the "**First 17 June YouTube Video**"² and the "**Second 17 June YouTube Video**"³). I do not know Dave's full name. Dave was wearing a white t-shirt and is circled in blue in Image 1 below **[SJG1/23]**. I am also aware that the third individual, who was wearing a black polo top, goes by the name of 'Tim' from the First 17 June YouTube Video **[SJG1/20]**, who is circled in green in Image 1 below **[SJG1/23]**.⁴
18. The three individuals were standing between the entrance and exit lanes on the public highway as the first refuse collection vehicle ("**RCV**") approached the exit at approximately 6:45 am.
19. In the First 17 June YouTube Video, one of my colleagues can be seen asking the three individuals "*if this turns right what are you going to do*".⁵

² <https://www.youtube.com/watch?v=ikCT3wiZ1-8&t=735s> [accessed 3 October 2025] **[SJG1/20]**.

³ <https://www.youtube.com/watch?v=o3wv03VWkqc> [accessed 12 September 2025] **[SJG1/21]**

⁴ First 17 June YouTube Video at 2.28 mins **[SJG1/20]**.

⁵ First 17 June YouTube Video at 4.25 mins **[SJG1/20]**.

20. As can be seen in CCTV footage, as the first RCV turned left out of the depot, whilst Tim stepped further back into the exit lane, Mr Diviney approached the RCV and attempted to hand a leaflet to the driver (see Image 1 in my exhibit [SJG1/23]).⁶

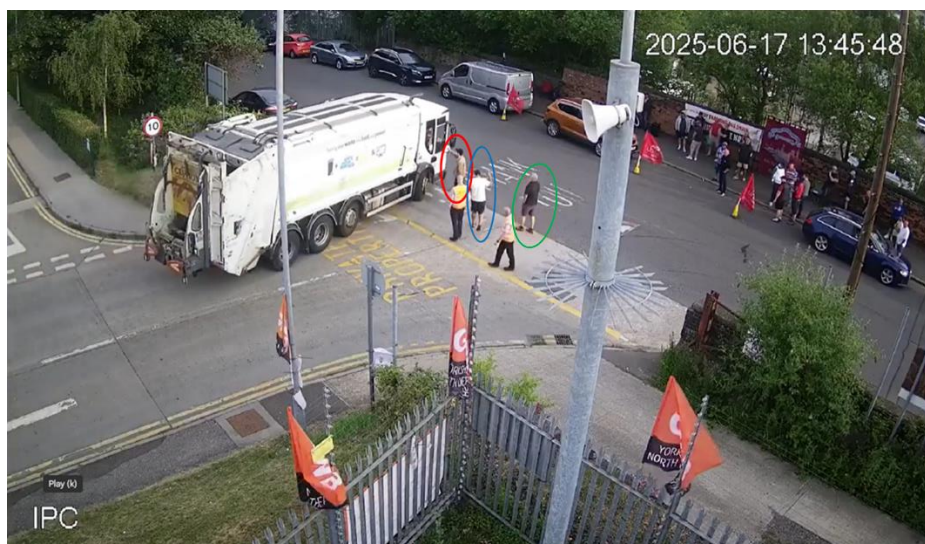


Image 1: Screenshot of Lumley Street Depot CCTV footage on 17 June 2025 at 06:45:48.⁷

21. In the First 17 June YouTube Video, Dave can be seen and heard approaching the first RCV and shouting at the driver to “*get a spine, you cunt*”, whilst another person in the background can be heard saying “*you should be ashamed of yourselves*”.⁸ These are just some examples of the hostility that our drivers have faced as they are trying to do their jobs. As a result of the hostility, we have suggested to drivers and crews to close their windows when exiting the depot.
22. After the first RCV left the depot, Mr Diviney and Dave continued to stand on the right-hand side of the exit lane, and approaching or standing in close

⁶ Extract of CCTV footage at the Lumley Street Depot at 06:45:54 to 06:45:52 [SJG1/20].

Please note that the timestamp on the CCTV footage is seven hours ahead.

⁷ Please note that the timestamp on the CCTV footage is seven hours ahead.

⁸ First 17 June YouTube Video between 4.39 mins and 4.45 mins [SJG1/20].

proximity to the RCVs as they were exiting the depot until the last RCV left at approximately 6:55 am. This can be seen in the CCTV footage,⁹ and in the First 17 June YouTube Video.¹⁰ While they do not prevent any vehicles from exiting the depot on this occasion, in my exhibit I include screenshots of the YouTube footage which show the proximity of these two individuals to the vehicle:

- (A) One is an example of Mr Diviney attempting to hand a leaflet to a driver (see Image 2 in my exhibit [SJG1/24]) as an example of how close they came to the vehicles.

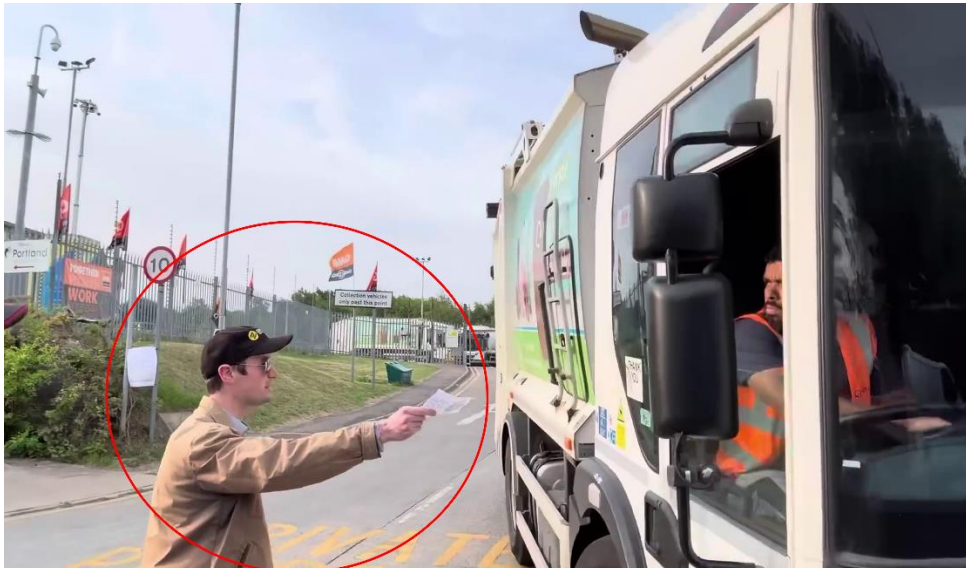


Image 2: Screenshot of First 17 June YouTube Video on 17 June 2025 at 4:53.

- (B) Another is a screenshot showing how close Dave came to the vehicle whilst filming (see Image 3 in my exhibit [SJG1/25]).

⁹ Extract of CCTV Footage at the Lumley Street Depot at 06:45:42 to 06:55:00 [SJG1/22].

¹⁰ First 17 June YouTube Video between 4.53 mins and 13.41 mins [SJG1/20].



Image 3: Screenshot of First 17 June YouTube Video on 17 June 2025 at 5:00 mins.

23. On 19 June 2025, two individuals protested on the public highway behind the private property line at the depot. One of my colleagues took footage on their mobile phone on the day of the protest. It was then uploaded by my colleague, William Sixsmith, on Veolia's internal system (the "**Phone Footage**") [SJG1/26]. Mr Diviney was one of these individuals. He was dressed in an orange hi-vis jacket and wearing a black baseball cap (as above, he is circled red in the images in my exhibit – see Image 4 below [SJG1/27]).
24. Mr Diviney and the other person (who I am unable to identify), stood in the entrance lane on the public highway behind the private property line at the depot. As one of the RCVs tried to turn right, Mr Diviney was forced to step further to the right but remained close to the vehicle. A member of Veolia staff, Steve Taylor, told Mr Diviney that he was standing too close to the RCV. Mr Diviney ignored him and again moved closer to the exiting vehicles, and continued to pose a hindrance to vehicles as they turned right out of the exit lane. This can be seen at 00:08 to 00:21 minutes of the Phone Footage [SJG1/26].



Image 4: Screenshot of Phone Footage on 19 June 2025 at 00:08 mins.

25. Multiple people at Veolia, including me, raised concerns with Veolia's management team about the safety issues of people standing so close to the RCVs. In my experience, standing too close to the RCVs prevents the vehicles from leaving the site safely.

26. Mr Diviney protested at the depot on several days between 24 June 2025 and 3 July 2025.¹¹ I was not at the depot for all of the occasions Mr Diviney was protesting. However, where I did not observe Mr Diviney myself, my colleagues made me aware of his presence. On each occasion he stood behind the private property line of the depot but was in close proximity to the vehicles turning right out of the depot. On 24 June and 25 June, Mr Diviney was accompanied by another individual, but he was alone on 26 June, and on 1, 2, and 3 July.

SECTION D: INTERACTIONS WITH THE POLICE

27. I contacted Superintendent Paul Ferguson of South Yorkshire Police on several occasions by phone and email. A timeline of this contact is detailed below:
- (A) 13 June 2025, at 15:55: a phone call to confirm that the injunction had been granted;
 - (B) 16 June 2025, at 10:52 and 15:01: a phone call to confirm the injunction was in place;
 - (C) 17 June 2025, at 08:50 and 09:07: phone calls to inform that protestors had arrived at the Lumley Street Depot;
 - (D) 17 June 2025, at 09:12: an email to ask Superintendent Paul Ferguson to invite Beth Whittaker to a meeting in the evening of that same date;
 - (E) 2 July 2025, at 15:39: a phone call to inform of a mass picket;
 - (F) 2 July 2025, at 15:43: an email following up on the phone call of the same date, communicating an article from Socialist Worker which detailed the plans for the mass picket on 9 July 2025; and

¹¹ On 24 June, 25 June, 26 June, 27 June, 1 July, 2 July and 3 July.

- (G) 18 August 2025, at 13:58: an email informing the police of a further mass picket.

SECTION E: MONITORING THE INJUNCTION

- 28. The Claimants have monitored the Injunction Order and the Warning Notices located at each of the sites subject to the Injunction Order to ensure that they remain affixed and are legible as required by paragraphs 9(c) and 9(d) of the Injunction Order.
- 29. Monitoring is required to be undertaken in the first week of each month, as out below:
 - (A) From Tuesday 1 July 2025 to Monday 7 July 2025 (“**First Inspection**”);
 - (B) From Friday 1 August 2025 to Thursday 7 August 2025 (“**Second Inspection**”);
 - (C) From Monday 1 September 2025 to Sunday 7 September 2025 (“**Third Inspection**”);
 - (D) From Wednesday 1 October 2025 to Wednesday 8 October 2025 (“**Fourth Inspection**”);
 - (E) From Saturday 1 November 2025 to Friday 7 November 2025; and
 - (F) From Monday 1 December 2025 to Sunday 7 December 2025.
- 30. I tasked the following individuals with carrying out the monitoring checks and completing a log of the checks:
 - (A) **Lumley Street Depot and Lumley Street Workshop:** Elizabeth Johnson, Interim Contract Manager at Veolia, and Nick O’Neill, Contract Manager at Veolia;
 - (B) **The ERF:** Matt Lee, Maintenance Manager at Veolia;

- (C) **Tinsley Park Road:** Paul Hutchinson, Area Manager at Veolia; and
 - (D) **Beighton Site:** Wayne Draycott, Operations Manager at Veolia, and Graham Clark, MRF Manager at Veolia.
31. I set out below a summary of the monitoring checks completed to date.
32. The First Inspection was started on 2 July 2025. I include a monitoring log for the First Inspection in my Exhibit **[SJG1/28]**. The majority of the checks were completed by 4 July 2025 and photographs of the checks were provided to me, with some exceptions:
- (A) The first exception was that Nick O'Neill initially missed the check on the A4 Order at the Lumley Street Depot. I asked for the check to be completed and a photograph to be provided of the Injunction Order at the site, which was completed by Simon Collins on 14 July 2025 **[SJG1/30]**.
 - (B) The second exception was that Nick O'Neill had also incorrectly marked the Warning Notice and the Injunction Order as affixed at the Workshop Entrance. I had not been provided with a photograph of the Warning Notice at the Workshop Entrance, so I requested one and this was provided on 14 July 2025. As explained above, there was an oversight due to confusion between the Injunction Order and the 6 June Order, meaning that the Injunction Order was not affixed at the Workshop Entrance **[SJG1/31-32]**.
33. I include photographs taken of the Injunction Order and Warning Notices during the First Inspection in my exhibit **[SJG1/29-41]**. With the exception of the Injunction Order that was missing at the Workshop Entrance, after the corrections, all of the Injunction Orders and Warning Notices were affixed and legible.
34. The Second Inspection was started on 1 August 2025 and the first round of checks was completed by 5 August 2025 and photographs of the checks were provided to me (with the caveat that Elizabeth Johnson incorrectly

marked the Injunction Order as affixed at the Workshop Entrance). I include the monitoring log for the Second Inspection **[SJG1/42]** and photographs in my exhibit **[SJG1/43-56]**. I arranged for the Warning Notices at the entrance and exit to the ERF to be replaced because the legibility of some of the text had been impaired by rain (as set out below). These were replaced by Elizabeth Johnson, Interim Contract Manager at Veolia, on 8 August 2025 **[SJG1/47-48]** **[SJG1/50-51]**. With the exception of the Injunction Order that was missing at the Workshop Entrance, after the corrections, all of the Injunction Orders and Warning Notices were affixed and legible.

35. Between the Second Inspection and the Third Inspection, the Court resealed copy of the Injunction Order, stamped with the new claim number and sealed on 1 August 2025, but in which the Plans 1 to 5 were in black and white only (the "Resealed Injunction Order"). I understand from S&S that they received a copy of the Resealed Injunction Order by post on 11 August 2025. Whilst S&S liaised with the Court for an updated copy in colour, I arranged for the Resealed Injunction Order to be put up at the relevant sites, which was completed on 16 August 2025, including at the Workshop Entrance **[SJG1/57]**.
36. The Third Inspection was started on 1 September 2025 and the first round of checks was completed by 4 September 2025 and photographs of the checks were provided to me. I include the monitoring log for the Third Inspection and photographs in my exhibit **[SJG1/58-59]**. With the exception of the Warning Notice at Beighton (which I arranged to be reprinted **[SJG1/68]**) all of the Injunction Orders and Warning Notices were affixed and legible.
37. After the initial checks for the Third Inspection had been completed, S&S informed me that the Court had told S&S to disregard the Resealed Injunction Order and to instead use the original Injunction Order. Accordingly, I arranged for the removal of the Resealed Injunction Order and for the original Injunction Order to be affixed at the relevant sites. I enclose photographs of this in my exhibit, which was completed by 25

September 2025 [SJG1/70-77] (albeit I note that the original Injunction Order at Beighton appears to be in black and white [SJG1/77], and so I arranged for this to be reprinted in colour, which was completed on 7 October 2025, as can be seen in the photographs for the Fourth Inspection [SJG1/92]).

38. The Fourth Inspection was started on 1 October 2025 and the first round of checks was completed by 8 October 2025 and photographs of the checks were provided to me. I include the monitoring log for the Fourth Inspection [SJG1/78-79] and photographs in my exhibit [SJG1/80-92]. As explained above, I asked for the Injunction Order at Beighton to be reprinted in colour [SJG1/91-92].
39. As explained at paragraph 87(B) and (C) of Johnson 1, a Health and Safety Notice had been erected at the Lumley Street Depot on or around 17 April 2025. Following the raising of safety concerns, as explained at paragraph 25 above, Veolia decided to update the Health and Safety Notice and to affix these to the relevant sites. These notices were intended to ensure the health and safety of all individuals involved, in particular with regards to the dangers of standing in close proximity to the vehicles. As explained in paragraph 36 of Ford 1, these notices were set up on 10 October 2025. The wording on the notices is as follows:

“Protests at Veolia Lumley Street - health and safety notice

Whilst Veolia fully respects the right to carry out peaceful picketing, ensuring the health and safety of all individuals involved is paramount.

In line with industry guidelines and good practice, and as part of the safe system of work which Veolia has put in place, stringent safety requirements apply to the movement of vehicles, particularly refuse collection vehicles (“RCVs”). This includes slowing down or stopping the vehicle if anyone: approaches it while it is moving, stands in close proximity to the vehicle or blocks the vision of a driver. Behaving in this way can put you and others at risk.

Anyone approaching or standing close to an RCV, or blocking a driver’s vision while attempting to exit or enter this site, with the effect that the vehicle is unable to proceed safely, will be considered to be blocking or

obstructing that vehicle. This may amount to a breach of the Injunction, dated 13 June 2025.^[1]

In order to ensure the health and safety of everyone involved, we kindly request that you adhere to the following safety guidelines at all times:

1. **Avoid Moving Vehicles:** *Please maintain a safe distance from all moving vehicles (taking particular note of the need to allow unimpeded entry to and exit from the site for vehicles, including RCVs). For your safety, please remain on the pavement or in areas designated for pedestrians rather than standing in the road.*
2. **Keep clear of Heavy Machinery:** *For your safety, do not approach or obstruct heavy machinery. Such machinery can pose significant risk to health and safety if not given adequate space to operate.*
3. **Consider your Surroundings:** *Always remain vigilant and aware of your surroundings to prevent any unintended incidents or risks to your health and safety or the health and safety of others. For your safety, please remain on the pavement or in areas designated for pedestrians.*

We appreciate your cooperation in ensuring a safe environment for everyone.

[Footnote 1] The details of the Injunction, including the sealed order and related supporting documentation can be found at the following link: <https://www.sheffield.veolia.co.uk/june-2025-court-documents>.

SECTION F: UPDATE ON THE LEGAL STATUS OF THE PICKETS

40. Allen 2 states that the strike action conducted by Unite has been treated as lawful by the Claimants. The strike action conducted by Unite continues to be treated as lawful by the Claimants, and as things currently stand, Unite has continued to regularly ballot industrial action in relation to the Lumley Street Depot, approximately every 12 weeks.
41. I refer to paragraphs 9 to 13 of Allen 2, which set out the details of the first ballot and the latest concluded ballot at the time. I note that the end of paragraph 9 refers to the first ballot results dated 2 July 2025, but this should instead refer to 2 July 2024. The results of the latest ballot at the time of Allen 2 were notified to Veolia UK by Unite on 6 February 2025, and as stated at paragraph 13 of Allen 2, on 29 May 2025, Veolia UK had received a letter from Unite notifying of an intention to ballot again for industrial action.

42. Since Allen 2 was filed, Veolia UK has been notified of the outcome of that ballot dated 29 May 2025, and has been notified of a further ballot and industrial action. Details of both ballots are set out below:
- (A) On 24 June 2025, Veolia UK received a letter from Unite, notifying it of an official industrial action ballot having taken place on 24 June 2025. I exhibit the ballot and its results at **[SJG1/93-94]**. In the ballot results notified on 24 June 2025, the number of individuals who were entitled to vote was 58, the number of votes cast was 48, and the votes cast as a percentage of individuals who were entitled to vote was 82.76%. Of the 48 votes cast, 46 voted yes, which was 95.83% and 2 voted no, which was 4.17%. There were nil spoilt or otherwise invalid voting papers returned.
- (B) On 25 June 2025, Veolia UK received a letter from Unite, notifying it that: *“the continuous strike action as outlined in [Unite’s] notice dated 27th March 2025 in relation to our separate dispute will be suspended with effect from 23:59 on 8th July 2025”* and that this letter should be taken as *“fresh notice of industrial action...to take part in continuous strike action commencing at 00.01 hours on 9th July 2025”* **[SJG1/95-97]**.
- (C) On 26 August 2025, Veolia UK received a letter from Unite, notifying it of its intention to hold a ballot for industrial action **[SJG1/98-102]**. The notice states that the ballot is *“in relation to a trade union dispute over the failure adequately to engage in discussions with the union about the pay claim submitted on 27th May 2025”* **[SJG1/98]**.
- (D) On 15 September 2025, Veolia UK received a letter from Unite, notifying it of an official industrial action ballot having taken place on that date. I exhibit the ballot and its results at **[SJG1/103-104]**. In the ballot results notified on 15 September 2025, the number of individuals who were entitled to vote was 60, the number of votes cast was 44, and the votes cast as a percentage of individuals who

were entitled to vote was 73.33%. Of the 44 votes cast, 42 voted yes, which was 95.45% and 2 voted no, which was 4.55%. There were nil spoilt or otherwise invalid voting papers returned.

- (E) On 17 September 2025, Veolia UK received a letter from Unite, notifying it that: *“the continuous strike action as outlined in [Unite’s] notice dated 25th June 2025 in relation to our separate dispute will be suspended with effect from 23:59 hours on 1st October 2025”* and that this letter should be taken as *“fresh notice of industrial action...to take part in continuous strike action commencing at 00.01 hours on 2nd October 2025”* **[SJG1/105-107]**.
- (F) On 9 October 2025, Veolia UK received a letter from Unite, notifying it that it *“intends to call upon all [Unite’s] Driver and Loader members...to take part in discontinuous strike action. Commencing at 00:01 hours on 10th November 2025....”* The strike action is set to be carried out on a one week on, one week off basis, with the last week of discontinuous strike action listed as concluding on 8 March 2026 **[SJG1/108-110]**.

43. Allen 2 exhibited to it a table that I had prepared to summarise the details of the ballots including the dates of the notifications and outcome, and notifications of strike action following those ballots. I exhibit an updated version of that table at **[SJG1/111-112]**.
44. I understand from my colleague, Ian Burrows (HR Director for Treatment and Corporate at Veolia), that since June, GMB and Unite have communicated regarding GMB's offer of a courtesy arrangement, which I understand to mean a non-legally binding understanding between the two parties recognising each other's legitimate interests and setting out how they will communicate and act in relation to each other. However, we understand that while Unite has shown willingness to accept the arrangement, it has sought to expand certain terms of the offer. Significant tensions persist, with GMB firmly protecting its recognition rights. GMB has since closed direct communications with Unite, maintaining that only the

original terms of the courtesy arrangement remain available. Veolia continues to maintain communication with both unions, including acting as an intermediary.

SECTION G: DUTY OF FULL AND FRANK DISCLOSURE

45. S&S has informed me that full and frank disclosure is necessary for this application and throughout the process. I have aimed to comply with this duty in preparing this statement.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



Signed

Full name

Sophie Joy Garraty

Position or Office held

Senior Employer Relations Specialist at Veolia ES
(UK) Limited

Dated

22 October 2025