



Report of Finding and Sanction

Respondent	Johanna Morris
Case reference	2024/0700/D5
Inn of Court	Middle Temple (2007)
Status at hearing	Registered
Hearing date/s	29 May 2026
Tribunal Type	5 Person Tribunal

Tribunal members

Chair	HH Sara Staite
Barrister member	Jack Harris
Barrister member	Scott McDonnell
Lay member	Stéph Pandit
Lay member	Vincent Cullen

Representatives

Bar Standards Board	Gareth Tilley
Respondent	John Beggs KC

Outcome

Findings	Admitted.
Sanction	Reprimand and Fine of £3,000.
Costs	£3,810 to the Bar Standards Board

1. In accordance with an appointment made by the President of the Council of the Inns of Court contained in a Convening Order dated 01 May 2026 The Tribunal sat on 29 May 2026 to hear and determine 1 charge of professional misconduct contrary to the Code of Conduct of the Bar of England and Wales against Ms Johanna Morris, barrister of the Honourable Society of Middle Temple.

Charges

2. The following charge was admitted.

Charge 1

Statement of Offence

Professional misconduct, contrary to Core Duty 5 of the Code of Conduct of the Bar of England and Wales (9th Edition, Version 4.7).

Particulars of Offence

On 3 January 2024, Johanna Morris, a practising barrister, whilst attending Snaresbrook Crown Court as the covering prosecuting barrister in a bail application hearing, behaved in a way which is likely to diminish the trust and confidence which the public places in her or in the profession when she said to an attending police officer in conference before the hearing words to the effect of “she only wants a visa so that she doesn’t have to go back to her little goat farm where she is from” and “yeah, a fucking little goat farmer”, in reference to the Complainant involved in the bail application who was from Pakistan.

Parties Present and Representation

3. The Respondent was present and was represented Mr John Beggs KC. The Bar Standards Board (“BSB”) was represented by Mr Gareth Tilley.

Pleas

4. Ms Morris admitted the charge.

Evidence and Findings

5. This ruling follows a hearing which took place at the Disciplinary Tribunal of the Council of the Inns of Court on 29th May 2026.
6. The Tribunal is unanimous in respect of the decision which we have made today.
7. There is one charge of misconduct which has been made against Johanna Morris (hereafter referred to as ‘the Respondent’). The specific facts of the case are summarised in the statement of offence and particulars of offence which has been laid before the Tribunal and set out above.

8. The charge alleges professional misconduct contrary to Core Duty 5 of the Code of Conduct of the Bar of England and Wales. The details of the offence identified offensive and/or racist language made by the Respondent in respect of an individual of Pakistani origin (referred to as 'the complainant'). The language was not directed by the Respondent towards the complainant directly but was communicated to a police officer who had attended a bail hearing at court on 3rd January 2024. The police officer was concerned about the safety of the complainant if her ex-partner (the defendant to a criminal charge) obtained bail following the hearing. The Respondent was instructed at court to act on behalf of the Crown Prosecution Service to resist bail being granted to the defendant in light of allegations of domestic violence which had been made by the complainant during her relationship with the defendant.
9. Trainee Detective Constable (TDC) Gmerek advised the Respondent at court that the defendant sought bail on the erroneous basis that if granted bail he would be able to assist the complainant with her visa application to remain in the UK. According to TDC Gmerek's written evidence before the Tribunal, she assured the Respondent in advance of the bail hearing that the complainant did not want the defendant released from remand in order to assist her with a visa application. It would appear to us that the reference to the complainant needing to obtain or renew a visa in order to remain in the UK played a material part in the Respondent proceeding to make offensive/racist comments about the complainant which are referenced in the statement of offence.
10. At the time when the Respondent made the offensive comments about the complainant to TDC Gmerek, she had received a brief early indication from the judge that bail was very likely to be granted to the defendant with stringent conditions put in place. It would seem that the Respondent's use of racist language in her subsequent discussion with TDC Gmerek appeared to tap into the Respondent's provisional view that the complainant was somehow "playing the system" by linking allegations of domestic violence with the need to obtain a visa to remain in the UK.
11. As the Respondent said in her statement dated the 3rd June 2025, when she admitted using the language contained in the charge sheet: "it is possible that the comment arose in the context of me explaining to TDC Gmerek how the defence might portray the complainant's motivation". The Respondent added that by the end of the conversation with TDC Gmerek, she had the impression that the police officer understood and agreed with her explanation of the Bail Act requirements, the limits to

the legal grounds on which the defendant could be kept on remand, and the need to get the best possible conditions in place to protect the complainant pending trial.

12. In a subsequent exchange of emails with the police officer before the bail hearing took place in court, the Respondent said that she thought that TDC Gmerek had appreciated why she did not intend to oppose bail being granted to the defendant when the matter was called on before the judge for hearing.
13. The Respondent accepted in her statement that she had initially denied using the words attributed to her by TDC Gmerek, and that she did not believe she had said those words or anything like them. She said, "I am not racist and I could not believe that I would have said this sort of thing to anyone". She said that when she had seen screenshots of text messages sent by TDC Gmerek to a colleague on the 3rd January 2024, she had been shocked and horrified and realised that she must have said something along the lines of the words alleged. In paragraph 26 of her statement the Respondent said this: "I am not a racist, but I accept that I am sometimes irritable and at times I express myself in an overtly robust way without realising the impact of my words. It is also possible that I said the words as some sort of off-colour and misjudged joke. Although I have no recollection of using the words described by TDC Gmerek, I accept her evidence and deeply regret the offence I have caused".
14. Having read all the evidence before the Tribunal and specifically the written statement of TDC Gmerek dated the 11th January 2024, we are satisfied that TDC Gmerek found the Respondent's language, and the clear implication that the complainant was seeking to improve her chances of obtaining a visa to remain in the UK by "playing the system", to be very offensive, and that she felt extremely uncomfortable about the Respondent's use of racist language. Whereas she had felt that the Respondent had previously not been appropriately concerned about the complainant's welfare if her ex-partner was released from prison (i.e. the risk of potential harm to her and her children), it was the Respondent's subsequent use of explicitly offensive language which put the conversation at "another level" and made her feel extremely uncomfortable. TDC Gmerek also stated: "the comments struck me as rude and racist and something which should not be said... the comments emphasised my opinion that she did not care for the case or for the individuals involved". Moreover, TDC Gmerek was unimpressed by the fact that the Respondent did not raise the possibility with the judge in court that the defendant should remain on remand rather than released on bail.

Sanction and Reasons

15. Against the background of the admission made by the Respondent, the Tribunal have considered the appropriate sanction in this case. We firmly bear in mind that our focus must be on the impact of the Respondent's conduct on 3rd January 2024 in terms of the public's perception of her professional behaviour at the time and the extent to which her conduct (as admitted) was likely to diminish the trust and confidence which the public places in her and/or her profession.
16. It was agreed between counsel that the Respondent's conduct fell within misconduct Group I as set out in the sanction's guidance designated as "behaviour towards others".
17. On any view, the comments made by the Respondent as set out in the charge sheet, while not directed towards the complainant on a face-to-face basis, were extremely rude with obvious racist themes. We would go further and say that the language used was gratuitous. The Respondent was instructed at short notice to respond to a bail application and her remarks had no relevance to her instructions to act in a specific professional capacity.
18. We consider that in accordance with section 55(14) of the sanctions guidance that there was a discriminatory element for this conduct with motivation for the conduct arising from animosity or hostility to a person from a protected characteristic group, namely the complainant. We are entitled to factor this into our decision making even though misconduct group C, that is '*discrimination, non-sexual harassment and bullying*' was not the appropriate misconduct group in this case.
19. There was, as we find, an imbalance between the seniority of the Respondent, who has been practising as a barrister for 23 years and the lack of seniority of TDC Gmerek, which was emphasised by the use of offensive language on the part of the Respondent. We have taken this into account in respect of harm (identified in Step 2) and in our identification of the seriousness of the incident on 3rd January 2024.
20. We have considered at length the criteria set out to determine culpability and harm in Annex 2 and used our own judgment in this particular case as to the relevance of the identified features of culpability and harm.
21. We are satisfied in our review of the evidence in the case that the seriousness of the incident and the words used by the Respondent in her dialogue with TDC Gmerek, place the case within the middle range of seriousness, and we have found that there

was, on the facts set out above, moderate culpability and moderate harm in respect of the Respondent's overall conduct on the 3rd January 2024.

22. In our view the public would consider that the way the Respondent conducted herself at court in the presence of a police officer - who was clearly concerned about the welfare of a complainant bringing allegations of domestic abuse against her former partner - was wholly inappropriate, unprofessional and inexcusable.
23. In determining sanction, we have fully taken into account the submission made on behalf of the Respondent that she 'stepped into the breach' on 3rd January 2024 to make a bail application when no other counsel had been instructed and that in relation to the application itself and the safeguards required to ensure that the complainant was protected in the event that bail was granted, she behaved professionally in securing onerous and appropriate bail conditions.
24. In terms of aggravating factors, we consider the conduct directed towards a public sector worker, namely a police officer, was a relevant aggravating factor but not determinative of the outcome in the case.
25. We also consider that based on evidence provided by professionals, namely judges, KC's and other professionals who have worked with the Respondent over many years, this was, on balance, an isolated incident. However, even if borne out of a need to act decisively, there was no basis for the Respondent's use of language and behaviour at court which was both extreme and wholly unnecessary.
26. Furthermore, we have read with great care the testimonials from many legal professionals who have worked with the Respondent over the years and who have seen her professionalism within the criminal process. We were also very impressed by the testimonials from individuals whom the Respondent has helped at a very personal level during difficult times and individuals from all backgrounds and cultures who have looked to her for support and kindness which has readily been made available. These testimonials were extremely informative of the Respondent's character and conduct and they have played an important part in our decision making today. There is no indication whatsoever from any of the testimonials that the Respondent has racist tendencies and the thrust of all the testimonials - professional and personal - is that her conduct on 3rd January 2024 was a complete aberration on her part which the Respondent still finds very hard to recognise and to address.

27. We are also aware that the Respondent has attended an Open University diversity course since the incident in 2024. This course lasted eight weeks and there is documentary evidence that she benefited from her attendance on this course.
28. Taking all these matters into account but recognising the serious and significant nature of the events of the 3rd January 2024 and the culpability associated with the outburst of racist language displayed at court by the Respondent on that occasion, we have resolved unanimously to order (a) that Respondent should be reprimanded for her conduct and (b) that in light of the serious nature of her conduct she should also be required to pay a fine. In this regard we have determined that a fine of £3,000 is appropriate to reflect the seriousness of the misconduct but we do wish to record our belief that the misconduct was an isolated offence which does not indicate an ongoing risk to the public and/or a likelihood of repetition which would require the respondent to be prevented from practising as a barrister for a specified period of time. In all the circumstances, we are satisfied that a fine of £3,000 combined with a reprimand represents a proportionate response and sanction to the facts of this case and to all the matters which have been referenced in this ruling.

Costs

29. We order the Respondent to pay costs in the sum of £3,810 to the BSB, which was unopposed by the Respondent. It is left to the regulatory body to deal with any application for payment of costs by instalments.

Dated: 16th June 2026

**HH Sara Staite
Chair of the Tribunal**