



IAC-AH-DN-V1

**Upper Tribunal  
(Immigration and Asylum Chamber)**

**Appeal Number: PA/09041/2019**

**THE IMMIGRATION ACTS**

**Heard at Field House via Video link via Skype  
for Business  
On 13 November 2020**

**Decision & Reasons Promulgated  
On 08 December 2020**

**Before**

**UPPER TRIBUNAL JUDGE RINTOUL**

**Between**

**A N  
(ANONYMITY DIRECTION MADE)**

**Appellant**

**and**

**THE SECRETARY OF STATE FOR THE HOME DEPARTMENT**

**Respondent**

**Representation:**

For the Appellant: Mr A Offiah, Solicitor

For the Respondent: Miss J Isherwood, Senior Home Office Presenting Officer

**DECISION AND REASONS**

1. The appellant appeals with permission against a decision of First-tier Tribunal Judge Frantzis, promulgated on 13 November 2019, dismissing his appeal against a decision of the Secretary of State made on 4 September 2019 to refuse his asylum and protection claim.

### **The appellant's case**

2. The appellant's case is that he is at risk on return to Nigeria as he is a member and active supporter of IPOB which has been designated as a terrorist organisation in Nigeria as of 20 September 2017. The appellant has attended events organised by IPOB in the United Kingdom including demonstrations in London. One of the events was aired live in Nigeria on Al Jazeera and that as a result of his involvement with IPOB is reasonably likely to be known to the Nigerian authorities resulting in his arrest, detention and ill-treatment. The appellant also states that the Nigerian government monitor the activities of IPOB in the diaspora and as such his membership and support for IPOB will be known to them.
3. The appellant first claimed asylum on 12 September 2017. That claim was refused on 12 March 2018 and his appeal against that decision was dismissed by First-tier Tribunal Judge Freer on 22 May 2018. Although permission to appeal to the Upper Tribunal was granted, that appeal was dismissed on 19 March 2019.
4. Subsequent to that the appellant made fresh representations including an expert report from Ms Uzo-Peters that addresses the position of IPOB in Nigeria. The respondent maintained the refusal in a fresh decision against which this appeal lies.

### **Judge Freer's findings**

5. As these were central to the respondent's decision, it is necessary to set these out in some detail.
6. The judge did not find the appellant to be credible, relying in part on two earlier decisions from different FtTJs in different appeals brought by the appellant. He found IPOB was not a terrorist organisation [67], and without an expert report, was unable to determine whether the decree against prescribing IPOB in 2017 had effect [68 to 69].
7. He concluded that the appellant was not a high-level activist in any country [72] and was not satisfied that he had been monitored and identified in such a way that he would be at significant risk of serious harm in Nigeria [72]. He also found that there were no indications that typical rank and file members or supporters of IPOB were at particular risk [74] although their leaders might be, there being no report suggesting the risk applied to the lower level members returning from abroad apart from the IPOB leader. Although satisfied that the appellant had attended a number of recent protests in London [79] he found no evidence suggesting anything other than a low-level activist and found [80] that the appellant was not sincere in his activism.
8. The judge also found that there was no evidence that mere photographic records have led to any serious harm in Nigeria or to returning activists [81] nor that the appellant's name had been known to the authorities as a result of any photography during recent demonstrations [82] the appellant not referring to any specific social media publication of photographs. The judge did not accept either that he would actively demonstrate in Nigeria.

9. Judge Freer also found [89] that the Nigerian government had not shown to have the ability to identify the appellant and cross-refer to any pictures they may have of IPOB protests in London or in the alternative if their intelligence was very good they would be able to tell that he was not a high level activist and was not likely to make trouble in Nigeria. Thus, no cause was shown for putting resources into bothering him.

### **The Respondent's Case**

10. The respondent was not satisfied that the appellant was credible, relying primarily on Judge Freer's conclusions. She considered that Ms Uzo-Peters' report added little to the appellant's claim and did not demonstrate that he would be identifiable or questioned about his sur place activities on return to Nigeria.
11. Nor was he satisfied that the photographs of the appellant at events and weigh up the claim and failed to dislodge the findings of Judge Freer and the identification risks. Although accepting that some IPOB members faced risk in Nigeria, I did not accept that the news reports demonstrate that the appellant was at risk based on his individual circumstances.

### **Judge Frantzis' findings**

12. The judge heard evidence from the appellant, from Dr Justice Ukachi-Lois, national co-ordinator of IPOB in the United Kingdom. She directed herself [23] that the findings of Judge Freer must form the starting point for any decision, she then turned to Ms Uzo-Peters' opinion [25]. She found [28] that the appellant had established that:-
- (i) IPOB's present day umbrella organisation in Nigeria and approved Biafra related activism and the persecution of IPOB members by the Nigerian state is well recorded;
  - (ii) the suppression of pro-separatist Biafran activities by the Nigerian federal government was given judicial endorsement and by the Federal High Court of Nigeria, IPOB being proscribed under that court's powers;
  - (iii) it is an offence to be a member of a proscribed organisation, each offence carries on conviction a prison term of up to twenty years;
  - (iv) there is evidence of the immediate application sought by the Nigerian police particularly the special entry robbery unit being accused of human rights violations and extrajudicial killings of IPOB members during peaceful protests;
  - (v) that the Terrorism Prevention (Amendment) Act 2013 gives extraterritorial effect to the Terrorism Act 2011 and as such the appellant's membership in support of IPOB in the United Kingdom will be subject to prosecution in Nigeria.
13. The judge accepted Ms Uzo-Peter's findings with one caveat: she considered that the opinion that it was plausible that the Nigerian authorities were aware of the appellant's bond with IPOB as the military recently declared that activities of pro-

Biafran groups would be monitored, she was not satisfied that it was reasonably likely that this would occur. She drew a distinction between “plausible” and “reasonably likely”.

14. In doing so she noted that Judge Freer had found by the evidence before him that the Nigerian government had not been shown to have the ability to identify the appellant and cross refer to any pictures they may have of IPOB protests in London [29]. The judge considered that the arrest of a journalist and online blog based in the United Kingdom known for his views as the social media critic of the Nigerian government’s repression of IPOB, cited by Ms Uzo-Peters, was insufficient to depart from the findings of Judge Freer that it had not been shown that the Nigerian government had the ability to identify the appellant or the announcement in late 2017 of social media monitoring had been followed up by this if it had been carried out with adverse consequences, the journalist in question being already known through their journalistic activities, but being considerably different from a low level activist in the United Kingdom not otherwise known to the Nigerian state for any adverse reasons. She noted [31] that there was no evidence before the Tribunal of online or other monitoring of pro-Biafra groups in the diaspora leading to adverse consequences finding that it was “notable by its absence in light of the findings of Judge Freer and Ms Peters’ opinion that persecution had heightened since the proscription order in 2017”. (Note to self: this is not quite the same thing; and is comparing activities within the country and out of the country).
15. The judge was not satisfied by the provenance of the screen shot evidence from the Al Jazeera broadcast [33] finding the explanation as to how it had been obtained to be lacking in credibility noting that the CD contained footage streamed by Al Jazeera was not before her although it appeared to have been before the respondent. The judge noted that in any event the appellant was not identified by name in the image nor was there evidence of the Nigerian government’s ability to identify unnamed individuals and cross-refer to any pictures they may have of IPOB protests in London and as such advanced the appellant’s case no further.
16. The judge noted Dr Lois’ evidence [35] there would be some 50 to 100 participants in the demonstrations and in these circumstances in the absence of any evidence of facial recognition technology or other evidence that the Nigerian government has the capacity to identify low level participants are amongst many others merely from their photograph, she was not satisfied to the lower standard of proof the appellant would be identified at the airport to return as a pro-Biafra activist or supporter [35].
17. Directing herself in line with YB (Eritrea) v SSHD [2008] EWCA Civ 360 the judge considered that there is no evidence before the Tribunal over the two years since the proscription order in 2017 that low level members of IPOB in the diaspora who are merely attending to swell numbers (as Judge Freer had found) were of sufficient interest to be identified were placed on a list and arrested on return to Nigeria. He accepted that the situation for those present in Nigeria was plainly different there being no evidence of an inclination to identify and arrest protestors.

18. The judge did not accept that the appellant had a real commitment to the Biafran cause nor was she satisfied that he would actually demonstrate in Nigeria [39] nor was she satisfied that there would, be a risk of identification, following BA (demonstrators in Britain – risk on return) Iran CG [2011] UKUT 36 [40] nor was there evidence as to whether returnees would be screened and if so asked questions about their activities in the United Kingdom [41] and thus there was no question about the appellant having to tell the truth in questioning on return. In reaching that conclusion she did note the reference in the EASO report to the probing of deportees by Nigerian immigration officials as opposed to the standard treatment of questioning of all returnees.
19. The judge went on to dismiss the appeal on all grounds.
20. The appellant sought permission to appeal on the grounds that the judge had erred:-
  - (i) in making significant errors of fact, in particular referring to Ms Uzo-Peters as Dr Uzo-Peters at various points and referring to the Movement for Actualisation of Sovereign State of Biafra (MASSOB) as MOSSAB; and, applying to Devaseelan wrongly in that Judge Freer’s position was that all the objective material including Amnesty International required corroboration thus rendering Judge Freer’s findings of fact unsustainable in light of the expert report;
  - (ii) in misdirecting herself in law in that she had failed to consider that the appellant’s claim may have succeeded even if he had acted in bad faith or was not a good witness nor was there objective evidence in support of the findings that only high profile members of IPOB were at risk the judge having little regard to the Home Office Country of Origin Information nor did she give reasons for the heavy reliance and the previous findings of the Immigration Judge;
  - (iii) in failing to give sufficient reasons for believing the appellant’s claim and the evidence and findings of fact having little or no relevance to the evidence of regular meetings and attendance or that he had taken oath [requiring him to remain absolutely loyal to the IPOB, the judge failing to make findings in respect of the undertaking];
  - (iv) in criticising Ms Uzo-Peters’ report as vague and that she unfairly failed to disclose her concerns such that submissions could be made on that and the judge unfairly discounting the evidence of the Al Jazeera printout, there being no credible evidence in support of an allegation of forgery;
  - (v) in failing to consider Articles 2, 3 or 8 the judge failing to consider whether the appellant’s accepted membership and association with IPOB would put him at risk of ill-treatment contrary to Article 3 or would be an obstacle to reintegration as per paragraph 276ADE(1)(vi), the judge erroneously assuming the claim stood or fell with the asylum claim.
21. On 11 February 2020, Upper Tribunal Judge Owens granted permission stating:-

“It is arguable that the judge erred in finding that the Nigerian authorities would not be aware of the appellant’s (accepted) membership of the IPOB (a prescribed organisation) and activities in the UK in light of the expert’s opinion that it is “plausible that the Nigerian authorities are aware of the appellant’s involvement with the IPOB” and the witness’ evidence of the Nigerian authorities taking photographs of protestors. This finding is arguably material to the assessment of the risk to the appellant on return to Nigeria.

All the grounds may be argued.”

22. I heard submissions from both representatives.
23. I turn to the grounds individually although as the arguments developed in the hearing, the core issue in this case is whether there is a risk of the appellant’s membership of IPOB coming to the attention of the Nigerian authorities and whether the judge properly assessed that.

### **Ground 1**

24. Part 1 of this ground is without merit. The submission that what are clearly “slips” in referring to Ms Uzo-Peters as Dr Uzo-Peters and to MASSOB as MOSSAB could in no way be said to call into doubt the findings of facts. There is simply no basis to that submission and neither the grounds nor the submissions fail to show how even if these had been errors, they were material. To inflate what are clearly minor errors into casting doubt on the entirety of an expert’s evidence when the judge in fact accepted that the expert was an expert and accepted her opinions subject to one caveat is wholly inappropriate.
25. There is some basis for the submission that the judge had erred in her approach to Judge Freer’s findings about IPOB. Judge Frantzis, unlike Judge Freer, accepted the IPOB was prescribed and that membership if that organisation was a criminal offence, that offence having extraterritorial effect and that there were risks to members in Nigeria and she made no findings that this was restricted to high level activists. That is a significantly different picture of the risk from that found by Judge Freer at paragraphs 74 and 75 of his decision.

### **Ground 2**

26. There is no basis for the submission that the appellant had misdirected herself that the appellant could succeed even if he had acted in bad faith. Although she did not direct herself expressly in line with Danian v SSHD [1999] EWCA Civ 3000 or other case law, it is evident from her decision that she considered the issue of the appellant’s good faith only as to whether he intended to demonstrate on return. She also, fairly, considered that this involvement with IPOB as limited. That is in line with YB (Eritrea). The judge was not required to cite Danian or the other cases cited in the grounds; it is sufficient for her to show, which she did, that she had followed the principles established by the case law.

27. It is evident from her determination that the judge did consider the position of those who were at risk in Nigeria was different. She accepted the evidence of the expert to the effect that a large number of activists were detained and it cannot be said that the judge erred in distinguishing the case of a journalist with a significant online presence and who was arrested at his home is in a different position from somebody who is returning without having any online presence. It cannot be argued that the fact that the appellant is shown on an Al Jazeera broadcast is an “online presence”.
28. It cannot be argued either that the judge erred in relying on the facts as found by the previous judge who in fact relied on two previous determinations in which the appellant had been found not to be a credible witness. The decision of Judge Freer was relevant given that the claim was to all intents and purposes the same, albeit on this occasion supported by the report of Ms Uzo-Peters and other material. This is not a case in which new evidence has come to light, casting doubt on earlier findings of fact about specific incidents. Here, the evidence relates to risk on return.
29. As is evident, the judge did diverge from Judge Freer’s findings with respect to the IPOB. There is insufficient material to show that the oath taking was a matter put to the judge or that she was expected to make a finding. And the reference to oath taking in context of voodoo and witchcraft is with respect irrelevant. The judge was manifestly entitled and gave good reasons for concluding that the appellant was not a committed activist who would not continue his activities for IPOB on return to Nigeria. The reference to SA (Afghanistan) v SSHD [2019] EWCA Civ 53 is not relevant on the facts of this case.
30. There is no ground 3 in the renewed grounds.

#### **Ground 4**

31. The judge’s criticism of Ms Uzo-Peters’ report is not, contrary to what is averred, flawed. The judge undertook a detailed consideration of the matter and accepted her as an expert. There is only one matter with which she disagreed and that was the difference between whether a risk being plausible and reasonable. There is no basis in which it could be said that the judge erred in not raising that concern given the concerns about Ms Peters’ report were raised in submissions. It is also self-evident that there is a difference between something being plausible and there being a realistic chance of it happening. This is not an attack on the report; it is merely a finding that the report does not go as far as the appellant would like it to go.
32. The submissions with regard to the judge’s findings as regards the Al Jazeera CD fail to identify any material error. As the judge pointed out in her decision, it did not advance the case any further to show that the appellant had been shown on Al Jazeera. That is in the context of the evidence of Dr Lois’ evidence that there was monitoring from inside the embassy. As matter of common sense, it is unlikely that the Nigerian authorities would need to have regard to a news feed from Al Jazeera to identify protestors to whom they would need to attribute a name rather than, for example, relying on photographs taken from inside the embassy or using CCTV. I am at a loss to understand how the FTTJ’s reasoning is an “insult to the

commonwealth heads of government that attended and the head of the commonwealth". Such submissions have no place in grounds of appeal.

33. Further, at no stage did the judge consider that the issue was whether the document was forged; she properly approached the issue as one of reliability and so the references to RP (forgery) Nigeria [2006] UKAIT 00686 are irrelevant.

### **Ground 5**

34. The submission that the judge failed to consider Article 3 separately makes little sense on a proper analysis. As Mr Offiah accepted, the reason that the appellant would face difficulty on return was because of his activities on behalf of IPOB either inside or outside Nigeria. The factual matrix is the same as would be considered under Article 3 there being no suggestion that Article 3 was invoked in any other way such as, for example, a health claim.

35. Those entitled to humanitarian protection include those who have a well-founded fear of persecution but not for a convention reason, and those who meet the criteria set out in Article 15 (c) of the Qualification Directive. It is not suggested that this is a case in which Article 15(c) of the Qualification Directive is engaged which would be the only other basis on which it would be necessary to consider the issue of humanitarian protection separately; and, in any event, an Article 15(c) consideration is different from an Article 3 consideration. To that extent, SA (Afghanistan) can be distinguished. Similarly, the grounds fail to show how paragraph 276ADE(1)(vi) is engaged from the findings of fact as made by the judge. All that is said in the skeleton argument is that

"The Tribunal is respectively invited to consider Article 8 as per 276ADE(vi) and outside the Immigration Rules accordingly. No basis for any further submission to that effect is given. In the circumstances it cannot be argued that the judge erred in not addressing Article 8 or paragraph 276ADE in any detail".

36. That said, this appeal does cause me some concern. I bear in mind that the judge found the appellant is a member of an organisation which has been proscribed as a terrorist organisation in Nigeria. She also found that the Act under which that would be an offence has an extraterritorial effect, that is, that membership of the organisation outside Nigeria would also be an offence were he returned there. I am also mindful that members of the organisation have been subject to persecution in Nigeria and that the authorities actively seek them out.
37. I turn to what became the core issue: the risk of the appellant's membership of IPOB coming to the attention of the Nigerian authorities. It is important to bear in mind that such a risk must reach the low threshold applicable in asylum appeals; that it is plausible or possible is not enough. The judge recognised that, and that forms the basis for her noting that Ms Uzo-Peter's view that it was *plausible* that the authorities would know of him was not enough. That is a sustainable distinction.
38. It is sensible at this point to consider what was said by Sedley LJ in YB Eritrea at [18]:



“18. As has been seen (§7 above), the tribunal, while accepting that the appellant's political activity in this country was genuine, were not prepared to accept in the absence of positive evidence that the Eritrean authorities had "the means and the inclination" to monitor such activities as a demonstration outside their embassy, or that they would be able to identify the appellant from photographs of the demonstration. In my judgment, and without disrespect to what is a specialist tribunal, this is a finding which risks losing contact with reality. Where, as here, the tribunal has objective evidence which "paints a bleak picture of the suppression of political opponents" by a named government, it requires little or no evidence or speculation to arrive at a strong possibility – and perhaps more – that its foreign legations not only film or photograph their nationals who demonstrate in public against the regime but have informers among expatriate oppositionist organisations who can name the people who are filmed or photographed. Similarly it does not require affirmative evidence to establish a probability that the intelligence services of such states monitor the internet for information about oppositionist groups. The real question in most cases will be what follows for the individual claimant. If, for example, any information reaching the embassy is likely to be that the claimant identified in a photograph is a hanger-on with no real commitment to the oppositionist cause, that will go directly to the issue flagged up by art 4(3)(d) of the Directive.”

39. The judge did address that in her decision at paragraph 36. It is in the circumstances reasonable to assume that where, as here IPOB is suppressed in Nigeria that little or no evidence is needed to arrive at the strong possibility that the Nigerian High Commission films or photograph their nationals who demonstrate. It would also not be surprising that they have informers amongst organisation groups who can name the people who are filmed or photographed. The judge said this:

“Whilst I do not discount the possibility that the Nigerian Embassy (sic) may have informers within the IPOB in the United Kingdom, I do not accept that given the appellant's low-level interaction with the organisation he has is a profile or a name that the informers would be interested in. Whilst the proscription order of 2017 has extraterritorial effect and the Nigerian military has indicated monitor social media there is no evidence before the Tribunal (notably from Dr Peters) over two years later that most low level members of IPOB in the diaspora who are as Judge Freer found in the appellant's case merely attend to swell numbers of sufficient is to be identified placed on a list and arrested on return at the airport in Nigeria. Ms Peters refers only to “plausibility” in this regard. And I have in mind in particular paragraph 36 of her report. The situation for those present in Nigeria is plainly different and they come into direct contact with the Nigerian state who appear in the evidence to have an inclination to identify and arrest protestors: this is where the balance of Ms Peters' evidence lies.”

40. There is a obvious difficulty in deriving any evidence directly as to what occurs within any intelligence organisation. It may be possible to surmise how they process information and whether they attempt to link names to faces from external evidence. For example, in Iran it is known that the authorities have on occasion put

photographs of people they wish to identify on the internet offering a cash reward. Similarly, in the case of Myanmar evidence came to light to show that there was a sophisticated intelligence operation going on within the embassy in London whereby attempts were made to identify people. Equally, there may be evidence that returned asylum-seekers are questioned on arrival in a particular state and evidence of such questioning may indicate from the questions put or their being detained that the authorities of that country have been monitoring evidence have taken account of what has happened in for example the United Kingdom. There is no such evidence of nature in respect of Nigeria.

41. Here, it is evident, as the judge accepted, that the Nigerian authorities go to considerable lengths to identify those involved in IPOB who are active within Nigeria but that there is little evidence regarding what happens to its supporters on return to Nigeria. That could be for a number of reasons: it could be that they are few in number, that view return or it may be that the authorities are not interested, despite their actions within the country, in what occurs in the United Kingdom.
42. What concerns me is the extent to which, as the grounds aver at 2(iii) is the extent to which is that the judge appears not to have taken into account in assessing the risk to the appellant of just how seriously IPOB is treated by the Nigerian authorities. It is seen as a threat to the state security and to the unity of the state. Second, there is a difference in participating in the demonstrations as a supporter, for example demonstrating in favour of Biafran independence and being a member of an organisation which is proscribed.
43. But again, the difficulty here is the lack of evidence to show how the Nigerian authorities would deal with information gathered about the appellant. Given their evident interest in IPOB it would be surprising if they did not attempt to infiltrate or at least obtain information from within the organisation, not least as the organisation is in effect run outside Nigeria from the United Kingdom. To go further is speculative. It may be possible that they are able to place names, put names to photographs particularly if an individual is seen at more than one demonstration or is seen at smaller meetings at local level. But what is not clear is what is then done with that information. It is, to a significant degree, conjecture to conclude that the information will then be passed to the Nigerian authorities in Nigeria or that they would then make that information available at the point of the appellant's return.
44. There was no information before the judge as there is in the case of some other countries on any specific process undertaken by the country of return to document an individual or that questions are asked routinely on return or what those questions are. There is some evidence from the EASO report referred to by the judge where she draws a distinction between deportees and returnees. But there is little detail in that report even considering that the use of the word "deportee" and "returnee" were not adopted as terms of art as they would be in English law.
45. As against that, I am concerned also that much of Judge Freer's findings with respect to IPOB were based on views about whether it was proscribed or not, findings which

are no longer accepted. But that said, and while at [30] the judge considers that the arrested of a journalist is not a sound basis to depart from Judge Freer's findings, that is in the context of considering whether the Nigerian government have the ability to identify the appellant, and cross-refer him to photographs. The judge did not expressly take into account how IPOB are treated in Nigeria but it is evident elsewhere in her decision that she did so.

46. The judge correctly noted [31] that there was no evidence of adverse consequences for members or supporters on return to Nigeria, having distinguished for sustainable reasons, the examples of a well-known journalist and a man who wore a provocative t-shirt. She then went on to consider that there was no evidence of any heightened persecution of Biafra supporters since the Proscription Order of late 2017.
47. The difficulty with this part of the decision (paragraphs [30] to [31]) is that it is to an extent almost a review of Judge Freer's decision despite the fact that she had reached a number of conclusions about IPOB very different from those he had made.
48. In that context, it is of note that in her report at [40], Ms Uzo-Peters notes that after the proscription order in 2017, it was immediately acted on by the Nigerian police. Also, at [46]ff she documents increased repression of Biafra agitation and persecution of members of the movement including the arrest of 59 IPOB members who face trial as terrorists [49] and also at [55], she opines that the political environment for high or low profile members is not conducive.
49. But even taking that into account, as the judge noted, there is little evidence of adverse consequences on return [31].
50. I bear in mind that the Upper Tribunal should not seek to overturn a decision or findings of the First-tier Tribunal simply because they disagree with them or may have come to a different finding. I conclude that it cannot be argued that the judge misdirected herself in law as to the relevant test or failed to take into account evidence she did or did not take into account. The challenge is really as to weight, which was a matter for her, and to her assessment, looking at all of the evidence, of the risk on return. She found that the risk was not sufficient such that the appellant had proved his case. That was a decision she was entitled to reach and for which, for the reasons set out above, she gave adequate and sustainable reasons. It was judgment that was open to her it is a finding of fact. As such, it is not one which should easily be overturned and whilst it is a decision to which I might not of myself have come, it is nonetheless one which is sustainable and accordingly, for such reasons, I consider that the decision of the First-tier Tribunal did not make an error of law and I uphold it.

### **Notice of Decision**

1. The decision of the First-tier Tribunal did not involve the making of an error of law and I uphold it.

**Direction Regarding Anonymity - Rule 14 of the Tribunal Procedure (Upper Tribunal) Rules 2008**

Unless and until a Tribunal or court directs otherwise, the appellant is granted anonymity. No report of these proceedings shall directly or indirectly identify him or any member of their family. This direction applies both to the appellant and to the respondent. Failure to comply with this direction could lead to contempt of court proceedings.

Signed

Date 1 December 2020

*Jeremy K H Rintoul*

Upper Tribunal Judge Rintoul