



Upper Tribunal
(Immigration and Asylum Chamber)

Appeal Number: HU/02925/2018

THE IMMIGRATION ACTS

Heard remotely via video (Skype for Business)
On 12 March 2021

Decision & Reasons Promulgated
On 28 April 2021

Before

UPPER TRIBUNAL JUDGE BLUM

Between

SECRETARY OF STATE FOR THE HOME DEPARTMENT

Appellant

and

M S

(ANONYMITY DIRECTION MADE)

Respondent

Representation:

For the appellant: Mr D Clarke, Senior Home Office Presenting Officer

For the respondent: Mr Z Malik, counsel, instructed by Afsal Solicitors

This decision follows a remote hearing in respect of which there has been no objection by the parties. The form of remote hearing was by video (V), the platform was Skype for Business. A face to face hearing was not held because it was not practicable and all issues could be determined in a remote hearing.

DECISION AND REASONS

Background

1. The Secretary of State for the Home Department (the appellant in this appeal, hereafter "the SSHD") has been granted permission to appeal against the decision of Judge of the First-tier Tribunal Moore ("the judge"), promulgated on 21 August 2019, in which he allowed the human rights appeal of MS (the respondent in this appeal, hereafter "MS") against the SSHD's decision dated 8 January 2018 (but served on 11 January 2018) refusing MS's human rights claim. The human rights claim was made following the service on MS on 3 January 2017 of a deportation order. The deportation order was made following MS's conviction (after trial) on 17 June 2015 in respect of an offence relating to conspiracy to defraud. On 18 June 2015 MS was sentenced to 4 years imprisonment.
2. MS is a national of India. At the date of the First-tier Tribunal decision MS was 38 years old. He first entered the UK on 11 February 2005 as a student and was granted further periods of Leave To Remain. On 14 September 2012 he was granted entry clearance as the dependent spouse of a Tier 4 (General) Student (his wife, FM), valid until 20 January 2015.
3. MS's conviction in June 2015 for conspiracy to defraud concerned the fraudulent acquisition of high value prescription drugs when he was a manager of a branch of Boots. The value of the drugs stolen through the conspiracy was around £142,000. The Sentencing Judge found that MS, who pleaded not guilty, abused his position of trust as the branch manager, although it was acknowledged he had no previous convictions.
4. Following service of the signed deportation order on MS his previous legal representatives made submissions in May 2017 outlining his serious mental health issues and asserting that MS was at risk of suicide. The submissions were accompanied by MS's patient records and several newspaper articles/reports outlining what was submitted to be a lack of assistance in available care in India to those with mental health issues. MS was transferred to HMP Swaleside on 5 July 2017 for assessment under the Mental Health Act. Although he met the criteria for sectioning under the Mental Health Act, he received treatment and on 7 July was returned to HMP Maidstone. A letter from Dr Rachel Daly, a Consultant Forensic Psychiatrist at the Mental Health Inreach Team at HMP Maidstone, stated that MS had a diagnosis of treatment resistant schizophrenia and that he had started medication (Lamotrigine). Dr Daley had looked after MS intensively for 9 months. She additionally stated that MS was "currently not fit for detention as risk to self is high and because treatment resistant, which is linked to an increase risk of suicide, he is not fit to fly."
5. In her decision refusing MS's human rights claim the SSHD noted most of the content of the above paragraph, but considered that medical care was available in India (giving details of impatient or outpatient treatment by a psychiatrist at 'Institute of Human Behavior & Allied Sciences, in Shahadraa, Dehli', noting

that a WHO Mental health Atlas 2011 reported that social workers were employed in the mental health sector in India, and that mental health services were managed by each of the state governments in India (an example was the State of Punjab where there were 36 licenced hospitals and nursing homes). The SSHD denied that MS's deportation would expose him to a risk of breaching Article 3 ECHR.

6. In respect of MS's Article 8 ECHR based claim, the SSHD noted his length of residence in the UK, that his wife graduated with a Masters Degree and was currently employed as a software engineer, and his serious mental health issues. At the date of the decision FM had not been granted ILR and the SSHD was not satisfied they were in a genuine and subsisting relationship. Nor was it considered unduly harsh for FM to relocate to India with MS given that she was an Indian national who last entered the UK on 15 September 2012 aged 25. Having found that there would be no very significant obstacles to MS's private life should he be deported to India, the human rights claim was refused. MS appealed the SSHD's decision to the First-tier Tribunal pursuant to s.82 of the Nationality, Immigration and Asylum Act 2002.

The Decision of the First-tier Tribunal

7. The judge had before him the SSHD's bundle of documents prepared for the hearing and a bundle of documents prepared by MS's solicitors which included, *inter alia*, statements from MS and FM, and a psychiatric report prepared by Dr Aparna Wighe (a Consultant Psychiatrist) dated 12 February 2019. The judge heard oral evidence from MS via a Tamil interpreter, and oral evidence from FM.
8. In his decision the judge accurately set out the provisions of s.117C of the Nationality, Immigration and Asylum Act 2002 ("the 2002 Act") and noted, as detailed in s.117C(6), that, as MS received a sentence of 4 years imprisonment, the public interest required his deportation unless there were "very compelling circumstances" over and above those described in Exceptions 1 and 2 (the two Exceptions are contained in s.117C(4) and (5) of the 2002 Act). The only Exception of relevance is Exception 2. This applies, *inter alia*, if MS has a genuine and subsisting relationship with a qualifying partner and the effect of his deportation on his partner would be unduly harsh.
9. At [12] the judge reminded himself that the more serious the offence committed, the greater the public interest in deportation. The judge directed himself to the need to consider whether either of the Exceptions was satisfied, "and what goes above and beyond those thresholds." The judge reminded himself of the need for very compelling circumstances to be demonstrated. At [13] the judge stated:

"I am satisfied that this could be done, on the facts of this case, by showing that the effect of deportation on [MS's] spouse or child would be unduly harsh, and thus, that the requirements of Section 117C (5) of the 2002 Act

are met, or by demonstrating that cumulatively a number of factors reach the high threshold of demonstrating that there are very compelling circumstances over and above the exceptions to deportation in the Immigration Rules.”

10. At [14] the judge again directed himself as to the high test of demonstrating ‘very compelling circumstances’ by reference to the Supreme Court authority of **Hesham Ali** [2016] UKSC 60 and the earlier Court of Appeal authority of **SS (Nigeria) v SSHD** [2013] EWCA Civ 550.
11. At [16] the judge summarised the details of MS’s convictions and satisfied himself that MS’s offence was serious, and then summarised the remainder of the Reasons for Refusal Letter and the submissions from the Presenting Officer at [17] to [21] (the Presenting Officer argued that there was no evidence of remorse by MS, that it was not apparent how the psychiatrist (it is not clear whether this was a reference to Dr Daly or to Dr Wighe, or both) concluded that MS could not fly, and, presumably with respect to the psychiatric report prepared by Dr Wighe, why it was concluded that relevant treatment was unlikely to be available and accessed in India). The judge recorded the Presenting Officer’s submission that the psychiatrist was a medical expert and not a country expert in respect of the expert’s assertions relating to medical treatment in India.
12. At [22] to [25] the judge summarised the submissions of Mr Otchie, MS’s legal representative, who placed reliance on the report of Dr Wighe, with particular reference to MS’s high risk of self-harm or suicide and the psychiatrist’s opinion that any additional social and financial stressors could precipitate a deterioration in MS’s mental health and increase his risk of suicide. It was submitted on behalf of MS that his daughter, born in February 2019, was very likely to be registered as a British citizen following the grant of Indefinite Leave to Remain to FM on 26 June 2019 and that, based on FM’s evidence, she would not return to India and that MS would be effectively abandoned and, bearing in mind the stigma of mental illness and the absence of any familial or other support, MS’s isolation would inevitably lead to a deterioration in his mental health.
13. In the section of his decision headed ‘My Findings of Fact and Conclusions’ the judge again reminded himself that MS’s offence was a serious one [27]. At [30] the judge indicated that he found the report by Dr Wighe to be of particular assistance. The judge referred to Dr Wighe’s diagnosis of paranoid schizophrenia and that this was a serious mental disorder which, according to the psychiatrist, had proved to be resistant to treatment. Dr Wighe was of the view that MS had “limited insight into his condition and relies entirely on his carer to comply with his treatment.” The judge found that the psychiatric report was in accordance with the evidence given by FM (who was MS’s ‘carer’) relating to his ability to function on a daily basis. The judge referred to FM’s evidence of the further deterioration in MS’s condition over the previous year.

14. At [32] the judge satisfied himself that MS was seriously mentally ill, that he had no insight into his illness and that he is “ambivalent about the diagnosis” made by the psychiatrist. At [33] the judge noted Dr Wighe’s opinion that MS’s history of symptoms was consistent with a diagnosis of schizophrenia and that, due to the treatment resistant nature of MS’s disorder, he would require medication for the rest of his life. The judge set out what MS’s current treatment would consist of (under the headings of pharmacological intervention, psychological intervention, occupational therapy and social intervention), the judge noted MS’s limited insight into his condition, and that he was reliant on his wife to comply with treatment. The judge also noted the psychiatrist’s opinion that MS remained at high risk of suicide and deliberate self-harm and that he was therefore not fit to fly. The judge concluded, based on the psychiatric report, the evidence from FM and MS’s presentation at the hearing, that MS had a serious mental disorder and that he could not cope on a day-to-day basis without his wife.
15. At [34] the judge stated:

“Whilst there are family members who continue to live in India, due to [MS’s] serious mental condition I can understand, and indeed appreciate that [MS’s] fear of social isolation and stigma if returned to India would be a likely outcome. According to the psychiatrist factors such as stigma and social isolation are well recognised risk factors and are associated with increased risk of depression and poor treatment compliance, which would consequently increase the risk of suicide and further episodes of psychosis.”
16. At [35] the judge reminded himself that MS had to show circumstances over and above those contained in s.117C (3) – (5) of the 2002 Act. At [36] the judge noted that, following the Reasons for Refusal Letter, FM had been granted ILR. The judge then stated:

“I need therefore to be satisfied that [MS’s] circumstances are something more than being unduly harsh on his partner. I am satisfied having considered all the evidence that it would be unduly harsh on [MS’s] partner if [MS] was to be deported for reasons articulated earlier in this determination, and essentially due to [MS’s] mental health condition he would be unable to cope on a day to day basis, leading almost inevitably to a deterioration in his mental state, which also might lead to an increased risk of suicide. Thus, the requirements of Section 117C (5) of the 2002 Act are met.”
17. At [37] the judge reminded himself of the public interest factors in favour of deportation, although he indicated his satisfaction that MS now accepted responsibility for his offending and was remorseful.
18. At [38], having found that MS and FM were in a genuine and subsisting relationship, and that she now had ILR, the judge stated:

“I am satisfied that it would be unduly harsh to any family life taking place in India bearing in mind [MS’s] mental state and the potential for isolation not only for [MS] but for family members due to stigma attached to such conditions.”

19. In the same paragraph the judge stated that he would consider factors not covered by the statutory framework as part of the wider Article 8 assessment, and again reminded himself that “there must be a very strong Article 8 ECHR claim to remain to displace the public interest in the deportation of foreign criminals, and in this case that must amount to very compelling circumstances over and above the exceptions to deportation.” The judge concluded that the test for very compelling circumstances was satisfied. The judge then stated:

“I am satisfied that there would be insurmountable obstacles to family life between [MS] and his partner continuing in India, and that there would be very significant obstacles to integration for [MS] in society in India. I am satisfied that deportation would almost inevitably break up the relationship between [MS] and his spouse since it is highly unlikely that the spouse would go to India to live with [MS]. It would also impact on the relationship between [MS] and his daughter and would very likely end face to face family relationship ties with his daughter since the daughter/child would remain in the United Kingdom with her mother.”

20. The judge then took into account the length of MS’s residence in the UK as a private life factor in his favour, and concluded, “for all the above reasons”, that the decision to deport MS was disproportionate. The judge consequently allowed the appeal on human rights grounds.

The challenge to the judge’s decision

21. The grounds contend that the judge failed to give clear reasons why he concluded that the threshold of unduly harsh consequences was met in respect of FM and MS’s non qualifying child. If MS were deported and FM and their child remained in the UK they would “undoubtedly miss [MS] and there would be some emotional and psychological impact, but it has not been evidenced in the determination that this would go beyond what is normally to be expected following the deportation of a partner/parent.”
22. Nor was there said to be cogent evidence beyond MS’s illness that family life could not continue in India. It was not suggested that treatment was not unavailable in India or that family members would not be prepared to assist MS if required.
23. The grounds contend that there was “no adequate explication” as to why the alleged potential effects of deportation in respect of MS could rationally be considered as anything more than very harsh.
24. The grounds finally contend that, although there is some stigma attached to those suffering from mental health conditions in India and that they may face

discrimination, there was no evidence to support a finding that treatment was not available or that the stigma attached to mental health problems reached the very high threshold of very compelling circumstances.

25. In granting permission to appeal Judge of the First-tier Tribunal Gumsley considered it arguable that the judge made an error in law in finding that the exceptions in s.117C were met or in failing to give adequate reasons for such a conclusion, and for finding that the matters relied on by MS were such as to reach the high threshold of very compelling circumstances and/or failing to give adequate reasons for such a conclusion.
26. In written submissions dated 24 July 2020 the SSHD submitted that the judge's assessment of the unduly harsh impact focused on MS rather than his partner and that there was no evidence as to how FM would be able to cope without MS. In respect of the judge's finding that it would be unduly harsh on FM to relocate to India, the written submissions argue that the judge failed to take account of the evidence contained in the Reasons for Refusal Letter relating to the availability of medical treatment in India "... whilst seemingly relying on a medical Expert who professes to have knowledge of the Indian medical system and of Indian culture to the level of Expert." The written submissions contend that there did not appear to be any country evidence that supported the conclusion that MS and his family members would be isolated from Indian society due to the stigma of mental illness. The written grounds further contend that the judge's finding that there would be insurmountable obstacles to family life continuing in India were unreasoned and unsustainable.
27. In his oral submissions Mr Clarke submitted that, whilst there was evidence of stigma associated with mental illness in India, there was no evidence that such stigma reached the high threshold needed to demonstrate very compelling circumstances over and above Exception 2, and that the expert only indicated his familiarity with cultural issues within psychiatry, not with the details of mental health treatment in India. It was not clear from the psychiatric report whether the reference to MS being 'not fit to fly' took into account the possibility of FM accompanying MS on a flight. With respect to the judge's finding at [36], there was no actual finding as to how MS's condition, if he were deported, would mentally affect FM such that there would be an unduly harsh impact on her. Moreover, there was no reference to or engagement with evidence relating to stigma and societal isolation in India. Mr Clarke submitted that the judge's finding that it was highly unlikely that FM would go to India to live with MS was problematic, but he accepted that the grounds did not challenge this factual finding.
28. Mr Malik relied on **UT (Sri Lanka) v SSHD** [2019] EWCA Civ 1095 (at [19], [26] and [27]), **AA (Nigeria) v SSHD** [2020] EWCA Civ 1296 (at [9], [32] & [38]), and **KB (Jamaica) v SSHD** [2020] EWCA Civ 1385 (at [16]) in support of the propositions that different tribunals might reasonably reach different conclusions in respect of the same evidence, that the Upper Tribunal is not

entitled to remake a decision of the First-tier Tribunal simply because it does not agree with it or because it is not as well-structured or expressed as it might be, and that the basis for the First-tier Tribunal's decision may be set out directly or by inference. Mr Malik went through the pleaded grounds and submitted that no challenge had been made to the judge's factual finding that FM would not return to India and that no application had been made to amend the pleaded ground to challenge this finding. Whilst Mr Malik accepted that the judge's direction at [13] was wrong, read holistically, the decision indicated that the judge did have in mind the correct test. The judge was entitled to rely on Dr Wighe's familiarity with cultural issues within psychiatry, especially in India, and he was also entitled to accept the psychiatrist's assessment of MS's risk of suicide and that he could not cope without FM. The judge was entitled to accept the evidence from FM and the psychiatrist relating to feared social isolation for the family, and that this finding was further supported by reference to the background evidence contained in the SSHD's First-tier Tribunal bundle. It must be inferred that the judge considered this evidence. Whilst it was accepted by Mr Malik that the stigma associated with mental health issues was not in itself enough to reach the 'very compelling circumstances' threshold, this was not the basis upon which the judge reached his conclusions as he took account of a number of factors and his conclusion was based on this cumulative assessment. [36] and [38], properly read, indicated that splitting the family unit would have very serious consequences for FM and MS and the judge was entitled to so conclude.

Discussion

29. The pleaded grounds of appeal have not suggested that the judge misdirected himself according to the correct legal test. In response to my observation during the 'error of law' hearing that the judge did misdirect himself at [13] to the extent that he appeared to equate the fulfilment of Exception 2 with demonstrating 'very compelling circumstances', Mr Malik referred me to the other numerous instances where the judge properly directed himself, including [35]. Given the absence of any reference in the grounds of appeal, the SSHD's further written submissions or Mr Clarke's oral submissions to a misdirection by the judge, and having considered the decision holistically, I am satisfied that, despite what he said at [13], the judge has properly directed himself on the test in s.117C(6) and that he fully appreciated the need for MS to demonstrate 'very compelling circumstances' over and above those in Exceptions 1 and 2.
30. The pleaded grounds, supplemented by the written submissions and Mr Clarke's oral submissions, contend that the judge failed to give adequate reasons why MS's deportation to India would have an unduly harsh impact on FM if she and their daughter remained in the UK. According to the SSHD the judge inappropriately focused his attention on the impact on MS's own mental health in the event of his deportation to India without his wife and child rather than the impact this would have on FM (his child not being a qualifying child).

31. The judge's conclusion at [36] must be read in the full context of the decision, particularly the judge's otherwise unchallenged assessment of the nature and seriousness of MS's mental health condition. At [31] the judge accepted that MS suffered from paranoid schizophrenia and that this was a serious mental disorder that had proved to be resistant to treatment. The judge accepted FM's evidence, which has not been challenged, that MS could not function on a daily basis without her support. The judge accepted FM's evidence that, despite her care, MS's condition had deteriorated over the previous year to the point where he had become withdrawn and did very little by himself. She needed to supervise his medication and to prompt him to do nearly all of his self-care activities. The judge properly noted that FM's evidence was supported by the psychiatric report and the psychiatrist's own assessment of MS, and that this was reinforced to the judge by his own description of the difficulties MS had in giving evidence at the hearing. It was rationally open to the judge to accept, at [33], the Consultant Psychiatrist's assessment that MS remained at high risk of deliberate self-harm and suicide and that he was reliant on FM for his care and treatment. At [34] the judge acknowledged that there were family members who continued to live in India, but he found that a likely outcome for MS if he was returned to India would be social isolation and stigmatisation. This finding must be considered in light of the evidence before the judge and the submissions made on MS's behalf. FM and MS had reported to the psychiatrist that they had been estranged by their families in India and that they feared further social isolation and stigmatisation if MS returned to India. The judge's note of the hearing recorded FM's evidence that MS's family in India would not support him and that he was estranged from them, that her family would not accommodate them, and she and MS would be isolated. The judge must be taken to be aware of this evidence as his decision refers to the submissions made by MS's representative that he would "effectively be abandoned" if deported to India "bearing in mind the stigma of mental illness and the absence of any familial or other support."
32. Given the above, it is tolerably clear that the judge had in mind, when assessing whether the deportation would have an unduly harsh impact on FM if she remained in the UK, the natural and reasonable impact on her of knowing that her husband would effectively be alone in India in circumstances where he would be unable to cope on a daily basis and in circumstances that would "almost inevitably lead to an increased risk of suicide" [36]. The judge's reference to the "reasons" he "articulated earlier" clearly point to the serious consequences to MS of being deported without his immediate family, and which must, apply a modicum of common sense, have a corresponding impact on FM. Although the judge could have articulated his finding with greater clarity, I am satisfied that his conclusion in respect of the unduly harsh impact on FM should MS be returned to India without her, was one reasonably open to the judge for the reasons given.
33. Having found that MS's deportation would have an unduly harsh impact on FM should she remain in the UK, the judge proceeded to consider whether

there were very compelling circumstances over and above this harsh impact. At [37] the judge reminded himself of the public interest factors in deportation, and then at the beginning of [38] he addressed himself to the issue of very compelling circumstances. It is surprising that the judge did not first deal with whether it would be unduly harsh on FM if she accompanied him back to India after his conclusion in [36] as any determination of undue harshness has to take account not just of the situation in which the family are separated, but also whether it would be unduly harsh for FM to live in India with the deportee. The judge did however consider this situation at [38], albeit that it was in the context of his assessment of 'very compelling circumstances.' The judge made a factual finding that it was "highly unlikely" that FM would go to India to live with MS. This was based on FM's oral evidence that she would stay in the UK if MS was deported because it would be "too much" for her emotionally and financially and because the baby would suffer. This was a factual finding open to the judge on the evidence before him. This factual finding was not challenged either in the grounds of appeal or the SSHD's written submissions, and no application was made at the 'error of law' hearing to amend the grounds to challenge this finding. The inescapable consequence of this factual finding is that FM would not accompany or join MS in India. The judge's decision must therefore be assessed within the confines of this specific factual framework.

34. The grounds of appeal content that the judge failed to take into account that treatment for mental health was available in India and that MS had family members who would be prepared to assist him, and that, although accepting there was stigma in India attached to mental health problems, there was no evidence that this level of stigma reached the very high 'very compelling circumstances' threshold.
35. I can deal with the point relating to other family members being prepared to assist MS briefly. The evidence before the judge indicated that, although MS had family members in India, they would not be prepared to assist him (see paragraph 31 above). The judge did not therefore fail to take this into account.
36. Contrary to the SSHD's written submissions, there was country evidence before the judge relating to the stigma associated with mental health issues in India. The SSHD's bundle of documents prepared for the First-tier Tribunal contained, in Annex O, a number of media articles/reports that had been provided by MS's previous legal representatives. These included an article from the Hindustan Times entitled "Voices in their heads: how India deals with mental disorders", a report from The Guardian newspaper entitled "India faces massive challenge to get mental healthcare right", and a Times of India report headed "Are mental health facilities in India adequate?". The Reasons for Refusal Letter itself made brief reference to the provision of these reports. Although the judge did not expressly refer to these reports he indicated at [8] that he had taken into account the documents placed before him in the SSHD's bundle, including Annex A - R. The reports referred to stigma associated with mental disorders and to consulting a psychiatrist, that such stigma still looms

large, that there was no insurance coverage for people with mental disorders, and, in respect of The Guardian article, that the stigma extended to the professionals who assisted those with mental disorders. In her oral evidence, as noted in the record of proceedings, FM indicated that the Indian population would make the family “feel bad” because of MS’s mental health and that she feared the immediate family would be isolated, evidence that was consistent with the media articles/reports.

37. The judge therefore considered whether there were ‘very compelling circumstances’ over and above Exception 2 in the context of unchallenged medical evidence that MS suffered from a serious mental disorder and that he was “seriously mentally ill” ([30], [32]), that he had limited insight into his condition, could not cope on a day-to-day basis without FM and relied entirely on her to comply with his treatment ([31], [33]), and that he remained at high risk of suicide and deliberate self-harm [33], unchallenged factual findings that FM would not relocate to India, and against a background in which MS would have no other family members to support him in India, where there was significant stigma associated with mental health issues, and where, according to the psychiatric evidence, factors such as stigma and social isolation were well recognised risk factors associated with increased risk of depression and poor treatment compliance and increased risk of suicide and further episodes of psychosis [34]. Contrary to the assertion in the grounds, the judge did not undertake his assessment of ‘very compelling circumstances’ on the basis that the stigma associated with mental health issues in India was, of itself, enough to reach the very high standard. The judge’s conclusion that there were ‘very compelling circumstances’ was based on a cumulative assessment of relevant factors (at [38] the judge explained that MS’s deportation would be disproportionate “For all the above reasons”) including the impact on FM and their child, the best interests of the child, the impact on MS’s mental health and the increased risk of self-harm and the deterioration in his mental state, his remorse for his criminal conduct and absence of other convictions, and his lengthy residence in the UK. Further, in undertaking the ‘very compelling circumstances’ assessment the judge demonstrably took account of the serious nature of MS’s offending ([12], [27], [37]) and weighed the relevant public interest factors in his assessment ([37], [38]), and he properly directed himself on the correct legal test ([10] – [12], [35], [36], [38]). The judge’s decision, properly considered, did not involve the making of an error on a point of law that requires it to be set aside.

Notice of Decision

The SSHD’s appeal is dismissed.

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

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

D. Blum

20 April 2021

Signed
Upper Tribunal Judge Blum

Date