IN THE MATTER OF THE LIBERAL DEMOCRATS AND

IN THE MATTER OF THE EQUALITY ACT 2010

ADVICE

1. I have been asked to advise the Liberal Democrats (the "Party") about a number of inter-related matters concerning transgender rights. These include the rights to equal treatment of transsexuals in the Equality Act 2010, how these rights are affected by the human rights of other persons under the Human Rights Act 1998, the implications of the judgment in *Forstater v CGD Europe* [2022] ICR 1 ('Forstater") for the way in which the Party handles complaints about transphobia and the legality of the Party's current definition of Transphobia (adopted by the Federal Board in September 2020). I have also been asked to consider potential reforms to the Party's complaints process to ensure that decisions are fair and lawful.

Defining terms

2. In this Advice I will refer to both sex and gender. The term "sex" has a relatively clear legal definition as a matter of English law - it means a person's biological sex at birth as recorded on their birth certificate, or, in the case of a person with a Gender Recognition Certificate, the sex recorded on that certificate. As the Equality and Human Rights Commission has pointed out, it follows that "a trans person who does not have a Gender Recognition Certificate retains the sex recorded on their birth certificate for legal purposes."
3. The term "gender" does not have a clear legal definition and is not in fact defined as such in the Gender Recognition Act, but is widely used to describe a person's sense or feeling of their own sexual identity, which in the case of a transsexual person is different from their biological sex at birth. The term "acquired gender" is often used to describe the gender in which a transsexual person lives their life and is a term used in the Gender Recognition Act.

Transgender Rights

Goodwin u UK

4. The law in relation to the legal rights of transgender persons has been transformed in the UK over the course of the last 20 years. In 2001, when Christine Goodwin brought her seminal case to the European Court of Human Rights*, in legal terms a person's gender was their biological sex at birth. It followed that in her case a person who had undergone a successful post-operative transition and who had been living fully as a woman for many years could not legally change her sex in the UK, with the result that she was recorded as a man for all official purposes (including social security, national insurance and employment), could not obtain a pension at the pensionable age for women (60) and could not marry a man, as her acquired gender was not recognised and same-sex marriages were (then) unlawful.
5. The European Court of Human Rights held that the principle of personal autonomy and the right of a person to establish their personal identity is a core facet of their Article 8 ECHR right to respect for their private life. The Court held at para 90 that "unsatisfactory position in which post-operative transexuals live in an intermediate zone as not quite one gender and not quite another is no longer sustainable." The UK's unwillingness to allow Ms Goodwin to change her birth certificate to reflect her acquired gender was held to infringe both Article 8 ECHR and Article 12 ECHR (the right to marry)

The Gender Recognition Act 2004

2. The UK Government responded to the Goodwin judgment by enacting the Gender Recognition Act 2004 ("GRA"), which came into force in April 2005. The GRA allows transgender people to apply to a body known as the Gender Recognition Panel to receive a Gender Recognition Certificate ("GRC"). Where a successful applicant is granted a full GRC under s.9 GRA, that person's gender becomes "for all purposes" their acquired gender (from the date of issue), so that if the acquired gender is the male gender, the

person's sex becomes that of a man, and if the acquired gender is the female gender, the person's sex becomes that of a woman.

3. It is a notable feature of the GRA that while in most cases it does require an applicant for a GRC to provide evidence of a medical diagnosis of gender dysphoria, it does not require them to have undergone gender reassignment surgery or hormone treatment. In this respect the GRA went significantly beyond the *Goodwin* judgment (which related to a post-operative transsexual woman) and at the time this aspect of the GRA was regarded as world-leading.

The Equality Act 2010

4. Discrimination against transgender persons in the context of employment had previously been addressed by the Sex Discrimination (Gender Reassignment) Regulations 1999, but it wasn't until the Equality Act 2010 that a comprehensive anti-discrimination regime was put in place for transgender persons. The Equality Act 2010 prohibited discrimination based on gender reassignment in a broad range of situations including the provision of services and public functions, the disposal and management of premises, employment, education and - of particular relevance in this context - membership of clubs and associations.

5. Importantly, the Equality Act contained a broad definition of gender reassignment under s.7, in the following terms:

> (1) A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.
>
> (2) A reference to a transsexual person is a reference to a person who has the protected characteristic of gender reassignment.

10. It follows from this definition that there is no need to be undergoing a medical process of transition, let alone to have obtained a GRC, for a person to qualify as a transsexual and be protected under the Act. All that is required is that a person is "proposing to undergo" a process of gender reassignment, which might be manifested by a person

simply making that intention known to other people, or starting to dress or behave like someone of the opposite sex." This definition does not cover all transsexual persons, however, as some persons might never have any intention of undergoing gender reassignment and would therefore be outside its scope.

11. The scheme of the Equality Act 2010 ("EqA") is to protect persons with defined "protected characteristics" from discrimination and other forms of mistreatment. By s.4 of the Act, one of the protected characteristics is gender reassignment. There are three types of conduct that are prohibited under the Act. The first is discrimination, either in its direct form under s.13 (unfavourable treatment because of a protected characteristic) or indirect discrimination under s.19 (applying a provision, practice of criterion that has a discriminatory effect in relation to a protected characteristic).

12. The second form of prohibited conduct is harassment, which is defined by s.26 as (a) where A engages in unwanted conduct in relation to a relevant protected characteristic of B's and (b) the conduct has the purpose or effect of violating B's dignity or creating an intimidating, hostile, degrading humiliating or offensive environment for B. In addition, there are further provisions dealing specifically with unwanted conduct of a sexual nature. Under s.26(4), in deciding whether the conduct has the effect set out above what must be taken into account is (a) the perception of B, (b) the other circumstances of the case and (c) whether it is reasonable for the conduct to have that effect. This definition is important and I return to it below.

13. The third form of prohibited conduct is victimisation under s.27, which concerns the situation where a person is subjected to a detriment for having exercised their rights under the EqA.

14. One of the other protected characteristics under s.10 of the EgA is religion or belief, where belief is defined to mean "any religious or philosophical belief and a reference to a belief includes a reference to a lack of belief'. This provision is important in the context of the Forstater case and I will return to it below.

15. The EqA creates a number of exceptions where the prohibition on gender reassignment discrimination does not apply. In these specific situations differential treatment on the grounds of biological sex at birth may be lawful in the case of a transsexual person even if they have changed their sex through the GRC process. The exception of potentially widest application is that in Schedule 3, para 28, by which transsexual persons may be

excluded from single-sex services, but only where this is "a proportionate means of achieving a legitimate aim". The Explanatory Notes to the Act give the example of a group counselling session for victims of sexual assault as the kind of service where this might be permissible, although with a proportionality requirement such decisions will inevitably be highly fact-sensitive. There are other specific exceptions for the armed forces (on grounds of combat effectiveness), sport, genuine occupational requirements, organised religion and communal accommodation.

The Human Rights Act

16. The Human Rights Act made the European Convention on Human Rights domestically enforceable for the first time. Article 8 is now part of UK law and can be and is relied on by claimants in advancing arguments for equal treatment for transgender persons. There have been many such cases, but they are beyond the scope of this advice.

17. The Human Rights Act also protects Article 10, the right to freedom of expression, which is in the following terms:

    1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing broadcasting, television or cinema enterprises.
    2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or of maintaining the authority and impartiality of the judiciary.

18. The structure of Article 10 is that if a measure would engage the right to freedom of expression under Article 10(1), any restriction on it under Article 10(2) must be (1) prescribed by law, (2) pursue one of the specified legitimate aims under Article 10(2) e.g. protecting the rights and freedoms of others (3) be necessary in a democratic society (fulfilling a pressing social need) and (4) be a proportionate measure.

19. There are two fundamental features of Article 10 case law that merit emphasis in the context of this advice. The first is the central importance of free expression in a democratic society and that it protects ideas which shock and offend as well as those

that are favourably received. In Sunday Times v United Kingdom (No 2) (1992) 14 ERR 229, the Court summarised the position thus:

> "Freedom of expression constitutes one of the essential foundations of a democratic society; subject to paragraph 2 of Article 10 (art. 10-2), it is applicable not only to "information" or "ideas" that are favourably received or regarded as inoffensive or as a matter of indifference, but also to those that offend, shock or disturb. Freedom of expression, as enshrined in Article 10 (art. 10), is subject to a number of exceptions which, however, must be narrowly interpreted and the necessity for any restrictions must b§e convincingly established."

20. The second is that the case law has repeatedly emphasised that speech on issues of public interest and concern, what is often called "political speech", ranks most highly in terms of the types of free speech protected in a democratic society.

21. Inherent in the whole scheme of the Human Rights Act and the ECHR is the idea that the rights of individuals have to be balanced against each other and also against other wider societal interests. The right to privacy under Article 8 and the right to freedom of expression under Article 10 are two rights which are frequently in tension and in reconciling these competing rights it is well-established that neither has presumptive priority over the other. The correct approach to balancing these rights was set out by Lord Steyn in *Re S (A Child) Identification: Restrictions on Publication)* [2005] 1 AC 593 at [171;

> "First, neither article has as such precedence over the other. Secondly, where the values under the two articles are in conflict, an intense focus on the comparative importance of the specific rights being claimed in the individual case is necessary. Thirdly, the justifications for interfering with or restricting each right must be taken into account. Finally, the proportionality test must be applied to each. For convenience I will call this the ultimate balancing test."

Fortstater

22. This case concerned a woman who was employed as a consultant by a small NGO. She was concerned about proposed changes to the Gender Recognition Act 2004 which would make legal recognition of self-identified gender easier and and she expressed her views on social media to the effect that a person's biological sex (which was not to be conflated with gender identity) was either male or female, was determined at conception and could not be changed. Complaints were made by colleagues that they found her

views transphobic and as a consequence her contract was not renewed. She brought a claim for direct discrimination contrary to s.13 of the Equality Act 2010, relying on the protected characteristic of religion or belief.

23. On the trial of the preliminary issue as to whether the claimant's "gender critical views" were a protected belief within s.10(2) of the Equality Act 2010, the Employment Tribunal initially rejected that argument. The claimant appealed to the Employment Appeal Tribunal (EAT*), where her case was heard by Mr Justice Choudhary, a High Court Judge and President of the EAT, and two panel members. The EAT allowed the claimant's appeal, holding that her gender critical views were a "philosophical belief" and entitled to protection under s.10 of the Act. This judgment was handed down on 10 June 2021 and was not appealed.

24. The finding that "gender critical views" may amount to a philosophical belief and hence be protected under the Equality Act 2010 is an important ruling. It means in practice that the expression of such views is protected under the Act and that employers or other entities such as political parties which seek to restrict the expression of such views, for example by taking action against their members or candidates, must be confident that any restriction they impose is necessary and proportionate. In particular, the judgment emphasises that expressing gender critical views is protected by Article 10 ECHR and that this is political speech, which is accorded a high degree of protection under the Human Rights Act.

25. Furthermore the judgment emphasises what is already clear from the case law on freedom of expression, which is that the expression of ideas that shock or offend others is protected under Article 10. The claimant's tweets included comments such as *"Yes I think that male people are not woman. don't think being a woman/female is a matter of identity or womanly feelings. It is biology."* and *"You are right on tone. I should not be antagonistic. But if people find basic biological truths that women are adult human females' or trans-women are men' are offensive, they will be offended."* The EAT accepted that these views would be offensive to many trans people, but nonetheless that the claimant had a right to express them.

26. The EAT also pointed out at para 51 that the claimant's gender-critical belief is not unique to her; "it is a belief shared by others who consider that it is important to have an open debate about issues concerning sex and identity" and quoted at length from the

evidence of Professor Kathleen Stock (a gender-critical academic) in the Miller case (see below). This evidence covered the hostility experienced by gender-critical academics who express their views and the ready willingness of other academics to label as transphobic anyone who dissents from the line that a trans woman is a woman.

27. The EAT qualified its judgment with the following observation in its conclusion at para 118(b):

> "This judgment does not mean that those with gender-critical beliefs can "misgender" trans persons with impunity. The claimant, like everyone else, will continue to be subject to the prohibitions on discrimination and harassment under the EA. Whether or not conduct in a given situation does amount to harassment or discrimination within the meaning the EqA will be for a tribunal to determine in a given case.'

28. The message of the EAT therefore is that both trans persons and persons with gender critical views are protected under the EqA. Persons with gender-critical views have a right to express them, even if doing so causes offence to trans people. However if the expression of those views turns into discrimination or harassment, that is another matter and in those circumstances action can be taken against the maker of those statements. It should be borne in mind that under the law of harassment the behaviour said to amount to harassment must reach a level of seriousness that takes it beyond the irritations, annoyances and even upset that arise occasionally in everyone's life.

29. This is consistent with Article 10 ECHR, where the starting point is free expression and the protection of all views (including those that offend others), but where that crosses the line into discrimination or harassment, restrictions to protect the rights and freedoms of others are justified under Article 10(2), so long as they are necessary and proportionate.

30. One issue raised in my instructions is whether there is a difference between holding a belief and manifesting it. I believe that the answer is to be found in the structure of Article 9 ECHR, which protects Freedom of thought, conscience and religion. Article 9(1) embraces the holding of religious or philosophical beliefs and the freedom to manifest those beliefs. Under Article 9(2), which concerns restrictions on those rights, there is no ground for restricting the holding of religious or philosophical beliefs, but there is a power to limit the manifestation of such beliefs, although any such restriction must be precribed by law, serve a legitimate aim, be necessary in a democratic society and

proportionate. In other words the right to hold a philosophical view is absolute, but the right to manifest it is qualified, just like Article 8 and Article 10.

Miller

31. The second recent case in which Article 10 ECHR has been held to protect "gender critical views" is *R(Miller v College of Policing* [2021] EWCA Civ 1926 ("Miller"). This is an important judgment of the Court of Appeal, led by its President Lady Justice Sharpe.

32. The claimant, Mr Miller, is a man with gender-critical views and he expressed those views on Twitter. A person complained to the police that the tweets were transphobic and the local police force recorded the tweets as a hate incident and warned the claimant that although his behaviour did not amount to criminal behaviour, if it escalated it might become criminal. Mr Miller challenged the lawfulness of the Hate Crime Operational Guidance on Article 10 grounds, on the basis principally that it involved a disproportionate interference with free expression by recording utterances subjectively perceived as hostile without requiring any evidence of hate.

33. The Court of Appeal found firstly that the mere act of categorising and recording speech as hate speech involved an interference with Article 10, as knowing that such matters were being recorded was likely to have a "chilling effect on public debate". Secondly, the Court found that the Guidance was unlawful because it sanctioned or positively approved disproportionate conduct; it required the police to record a non-crime hate incident under extremely broad circumstances and without requiring any objective consideration of the evidence.

34. An important aspect of this judgment is the way in which it decided that debates around gender in the context of transgender rights are important matters of public interest, in which gender-critical views play a legitimate role. The Court of Appeal held at [34] that:

> "The topic on which Mr Miller was tweeting and its broader implications are plainly important matters of public interest on which strong views are held and publicly expressed. Some are concerned as Mr Miller is, that enabling men to obtain legal recognition as women based on self-identification would carry risks for women because, for instance, it may make it easier for trans women to use single-sex spaces such as women's prisons. Others, however, consider it is of paramount importance for trans individuals to be able to obtain formal legal recognition of the gender with which they identify more easily.'

35. The Court also noted that Mr Miller's views were supported by many women's rights campaigners and academics. The judgment records the evidence of Jodie Ginsberg, CEO of Index on Censorship, that, "Some of those involved in the debate label those with different views as transphobic or displaying hatred when they are not; and many are intolerant of different views, even when expressed by legitimate scholars whose views were not grounded in hatred etc but are based on legitimately held different value judgments and form part of mainstream academic research.

36. At paragraph 35 the Court states:

> "In her evidence on this topic, Professor Stock gave an example of three utterances: "Trans women are men", "Trans women aren't women" and the use of the pronouns "he/him" rather than "she/her" in referring to a trans woman in the third person. Professor Stock describes these as utterances which are intended in the mouths of many people as simple observable facts, and non-evaluative utterances, along the lines of "water boils at 100 degrees" or pillar boxes in the UK are red." So here, she says, the failure or refusal to use of a preferred pronoun of a trans woman is not an expression of hostility but an indication of a descriptive, non-evaluative belief, that the trans woman is biologically male; and the fact that such readings tend to be heard as transphobic is not therefore a reliable guide to the true nature of the utterances. On the other hand, trans advocacy groups, such as Stonewall explicitly define transphobia as the fear or dislike of someone based on the fact that they are trans, including the denial or refusal to accept their chosen gender identity.

37. Of course, the Court of Appeal was not required to opine on what the definition of transphobia should be and it did not do so. But the effect of its judgment is that persons expressing gender-critical views are entitled to the protection of Article 10 even if their views are unwelcome to, or perceived as hostile by, the trans community. The Court's message is that in a democratic society everyone has to be prepared to tolerate hearing views that they don't like, which is part and parcel of living in a free and pluralistic society.

Case 64

38. Case 64 is a preliminary ruling by the Federal Appeals Panel of the Liberal Democrats which was handed down on 28 July 2021 and is shortly to be published. The facts of the case will be well known to those instructing me. The complainant was standing for election to the Federal Conference Committee of the party and had set out in her manifesto a proposal for using gender neutral denominations on conference passes and gender neutral bathrooms. The respondent in two Facebook postings had criticised these matters as the trivial, first world concerns of an indulgent minority,

suggesting the complainant was out of touch with real world issues. The complainant then complained that the respondent's remarks were transphobic. The Complaints Panel heard evidence from the respondent who expressed gender-critical views. On the basis of this and the content of the postings the Panel permanently banned the respondent from running for or holding office or leadership roles of any kind in the Party.

39. The Federal Appeals Panel allowed the appeal and directed the Complaints Panel to dismiss it. The Federal Appeals Panel relied in its ruling on Forstater, the protected status of gender-critical beliefs under the EqA and Article 10 ECHR.

40. I consider that the ruling of the Federal Appeals Panel was clearly right. agree that the respondent's longer post was dismissive and patronising towards the complainant, but where someone has put themselves forward for election they must expect that their views will come in for scrutiny and criticism. The respondent was fully entitled to criticise her platform and to argue that the Party had more pressing issues to focus on. His views were on a matter of public interest and although they were expressed in an insensitive way, they were protected by Article 10. In my view, these postings did not warrant any disciplinary sanction, let alone the extreme and draconian measure of banning the respondent from assuming any leadership role in the Party for life.

41. The focus on the respondent's views on gender (about which the postings themselves say very little) arose because the Complaints Panel interrogated the respondent about those views, from which it became apparent that he held gender-critical beliefs. On the basis of those beliefs (as well as the postings) the Complaints Panel disciplined him in a severe way, infringing his right to manifest his gender-critical views under s.10(2) EqA and his right to freedom of expression under Article 10 ECHR. In my view if the decision of the Complaints Panel has stood, the respondent would have had a strong claim against the Party for direct discrimination under the EqA on the basis of his protected beliefs.

42. I believe that in the light of the Case 64 ruling there is a clear need for the Party to issue guidance to its Complaints Panel members about how to handle complaints that relate to the postings of members and raise issues concerning freedom of expression in the light of Forstater and Miller.

The Party's definition of Transphobia

43. The Party's definition of Transphobia was adopted by the Federal Board in September 2020. It therefore pre-dates the judgments in Forstater and Miller. The definition consists of the definition itself and then of a series of illustrative examples. The illustrative examples are, in my view, highly problematic for the reasons I address below by reference to the relevant passages:

> *Mockery or dismissal of new names and pronouns and the identity they reflect. This often takes the form of inappropriate comparisons (people will be defining themselves as Muppets and Wombles next""), suggesting trans people do not mean what they say (for example by describing them as 'confused' or 'just trying to be controversial'), or suggesting trans identities are a fad through comments such as I'm too old to understand all this.*

44. While such mockery of dismissiveness may be offensive to trans people, Article 10 protects comments that shock and offend the recipient and in my view if comments such as these became the subject of disciplinary action it is likely that this would be a disproportionate interference with Article 10. Obviously this is a matter of fact and degree and one-off comments would be different from repeated mocking which, depending on the words used, could amount to harassment.

> 2. Using phrases or language to describe trans people which are designed to suggest that trans people are a separate category of person from the gender they identify as or that their gender identity is not valid. Current examples include referring to a trans woman or non-binary person as a "biological man" or a trans man or non-binary person as a "biological woman", which eradicates the trans person's gender identity in favour of their biology at birth.

45. Expressing the view that a trans woman is a biological man, or a trans man a biological woman, is a gender-critical view protected under the EqA and articles 9 and 10 ECHR. Disciplining party members for expressing such views is unlawful and likely to result in successful claims for direct discrimination.

> *Requiring trans people to be separate from society, using segregated facilities, or denying them access to facilities which would be required in order for them to fully participate in public life*.

46. As set out above, Parliament has legislated for exceptions to the Equality Act that make it lawful to discriminate against transsexual people in relation to single-sex services and in other specific contexts. It is difficult to see how conduct that is lawful under the Equality Act could properly be the subject of disciplinary action by a political party. If e.g. the party disciplined a member for being part of a single-sex service that was lawfully provided, that would in all likelihood amount to unlawful discrimination.

> Advocating the withdrawal or defunding of access to transition-related medical treatment for trans people or advocating or facilitating any kind of therapy that tries to change a person's gender identity.

47. This example shows that no proper thought has been given to freedom of expression. Why should someone not be allowed to argue, for example, that cancer services or long-COVID services should have priority over funding for transition-related medical treatment? I am not expressing a view on these matters, but to deem all such speech transphobic and to make it the subject of disciplinary action is to forget that in a free society people have the right to express themselves freely.

Action against members and candidates/office holders

48. As matters stand at present disciplinary action is taken under the Party's Constitution against both members and Party candidates and office holders. Two frequently invoked grounds for taking action under rule 3.8 of the Federal Constitution are (1) material disagreement, evidenced by conduct, with the fundamental values and objectives of the Party and (2) conduct which has brought, or is likely to bring, the Party into disrepute.

49. I am not aware of any statement of the "fundamental values and objectives of the Party" except for the preamble to the Federal Constitution, which is couched in such very general language. Without a document or documents defining further what those values and objective are, I can see many situations where a candidate or MP could disagree with the Party on an important matter of policy and the Party would have no clear basis for disciplining him or her. I would have thought that the Party's last general election manifesto and the speeches of the Party leader would, in practice, be important reference points, but there is no mention of them in the Code of Conduct. If the Party wants to discipline a member in relation to a matter of policy I think there needs to be much greater clarity as to what policies those are.

50. Conduct which has brought/is likely to bring the party into disrepute is also a very wide phrase which can capture a vast range of different situations. I can see that such a phrase is useful as a catch-all, but for the purpose of the complaints mechanism I think some guidance would be helpful, both in terms of the types of conduct that this would relate to an in the need for proportionality in initiating disciplinary action, as well as in

sanctions handed down. I note that there is no reference to proportionality in paragraph 1.2 of the Published Procedures of the Federal Appeals Panel - I think that there should be.

Conclusion

51. In summary, I advise that:

(1) The Complaints Panels need guidance on how to deal with postings on social media that engage the right to freedom of expression. In relation to the expression of views alleged to be transphobic, they need to know that gender-critical views are protected under EqA s.10(2) and Articles 9 and 10 ECHR. Postings expressing such views should not be the subject of disciplinary action unless they amount to discrimination or harassment.

(2) There should be a new focus on proportionality in the bringing of disciplinary action, which should usually be a last resort. Where disciplinary proceedings are brought and determined the complainant's favour, any sanction should be proportionate.

(3) The current definition of Transphobia contains several examples which are inconsistent with the right to hold gender-critical views under the Equality Act and Human Rights Act *(Forstater and Miller).* If the Party were to take disciplinary action based on these examples it would be engaging in unlawful discrimination against persons with gender-critical views.

(4) Further work is required to give guidance on the fundamental values and objectives of the Party if this is to be used for disciplinary action on disagreements over party policy with candidates.

(5) A similar exercise in relation to conduct likely to bring the party into disrepute would probably be of great assistance to Complaints Panels, bringing in clear criteria and emphasising the need for proportionality.

GUY VASSALL-ADAMS QC

MATRIX

27th May 2022