

IPSO Complaint – Case Ref #02492-20,02494-20#

Complainant Duncan Dollimore

Request for review by the Complaints Reviewer

Regulation 32 - IPSO Regulations

You wrote to me on 28 May to confirm that the Complaints Committee (the Committee) had considered my complaint but had declined to re-open it. Please accept these submissions as my request for a review by the Complaints Reviewer (the Reviewer) pursuant to regulation 32 of the IPSO Regulations (the regulations).

Under regulation 32 a complainant can request that a decision made by the Committee in accordance with regulation 27 be reviewed by an independent person (the Reviewer), on the ground that the process by which the Committee's decision was made was substantially flawed, with any request being made in writing to the Regulator within 14 days of the relevant decision by the Committee.

I was notified of the Committee's decision on 28 May, hence this request for a review is submitted with the permitted 14-day period.

Regulations 27 – 29 are set out within the regulations under the sub-heading 'Determination by the Complaints Committee'. Your letter of 28 May confirms that the Committee had 'considered my complaint', and had 'agreed the following decision', before referencing issues raised within my complaint. I would submit that the Committee's consideration of my complaint, resulting in a decision being agreed, is a determination for the purposes of regulations 27 -29.

Regulation 27 specifically states that if a complaint is not resolved by mediation, or following the conclusion of inquiries under Regulations 17-22, the Complaints Committee shall determine whether or not there has been a breach of the Editors' Code (the Code) and shall notify the complainant of its decision.

My complaint has neither been referred to nor resolved by mediation and has not been resolved in any way. Rather, the Committee has determined and notified me that there has been no breach of the Code. In those circumstances, I should have been notified that I had the opportunity within 14 days to request a review by the Reviewer if I considered that the process leading to the Committee's decision was substantially flawed, which I do.

Having set out how and why I am entitled under the regulations to request a review by the Reviewer (subject to showing a substantial flaw in process), I will outline the original reasons for both of my complaints, the grounds upon which they were initially rejected, the grounds upon which I submitted an application to review that decision, and the grounds upon which that application was rejected as set out in your letter of 28 May.

I will then outline the reasons why the decision-making process has been substantially flawed, and the grounds for review by the Reviewer.

Complaint 1

The first complaint concerned the behaviour of a journalist or photographer, and an article published by the Mail Online (Associated Newspapers Limited) on 4 April 2020 under the headline:

“London park shuts after 3,000 people visit, police break up 18th birthday party and revellers face court over beach barbecue as Britons defy PM's coronavirus plea to stay at home as 708 people, including five-year-old, die on UK's worst day.”

https://www.dailymail.co.uk/news/article-8186935/Police-tell-holidaymakers-stay-home-Easter-holiday-period.html?ito=social-twitter_dailymailUK

In addition to the written content, I complained about the use of a photograph in the article with the caption:

“Cyclists in Regents park have been ignoring the government's social distancing rules by riding in close proximity to each other. Prime Minister Boris Johnson called on people this weekend to stay at home, though these riders in Regent's Park were today taking advantage of the bright spring weather”.

I contended that both the article and photograph breached the accuracy clause of the Code <https://www.ipso.co.uk/editors-code-of-practice/#Accuracy> for these reasons:

1. The Mail Online headline refers to "Britons" defying the Prime Minister's Coronavirus plea to stay at home. The article then refers to individuals or groups of people who were not at home on the 4th April, including photographs purporting to demonstrate their failure to comply with the stay at home plea. The article includes numerous photographs of people exercising outdoors, suggesting that they were ignoring the regulations and guidance. At no point in the article is any reference made to exercise outdoors being:
 - a. One of the permitted reasons under the regulations for people to leave their homes, and not be at home.
 - b. Recommended both via the Government Guidance and Public Health Agencies.
2. The article provides a misleading and inaccurate impression of both the regulations and guidance, implying that the people shown in various photographs, exercising in various ways outdoors as recommended by the Government, are somehow ignoring those rules.
3. In relation to people cycling, the article states that "In London's Regent Park, dozens of 'Middle-Aged Men in Lycra' (MAMILs) ignored the Government's Covid-19 lockdown rules to congregate in Regent's Park in London to ride their bicycles in large groups" , referencing "Groups of men, clad in lycra, riding in close formation". This claim was supported by a photograph credited to Ben Cawthra, with the caption "Cyclists in Regents park have been ignoring the government's social distancing rules by riding in close proximity to each other. Prime Minister Boris Johnson called on people this weekend to stay at home, though these riders

in Regent's Park were today taking advantage of the bright spring weather." The claims made regarding groups of cyclists in Regent's Park are however not supported by Ben Cawthra's photograph, which has clearly been taken with a telescopic long lens camera. This has created a foreshortened appearance, compressing the image of the subject cyclists so they appear closer together than they were.

4. As with another photograph taken by Ben Cawthra, and published by the Mirror on the same date, the photograph of the cyclists in Regent's Park is taken with a narrow perspective from head on. A photograph taken from the side view with a wide lens would have shown that the cyclists in question were observing the social distancing guidance (riding at least two metres apart) and would not have supported the contention that they were riding in a group.
5. The photograph has been taken to create a misleading impression and support a factually inaccurate narrative. Publication of the photograph in the context of an article which inaccurately implies that exercise outdoors is somehow in breach of the regulations and guidance, unfairly and inaccurately suggests that those cyclists, others cycling in parks for their permitted and recommended exercise, and people choosing to cycle during the COVID-19 crisis were or are behaving irresponsibly, and potentially either illegally or contrary to guidance, all of which is incorrect.
6. In the absence of a wide angle photograph from a side on view, the distorted and compressed nature of the image is apparent from consideration of the road markings, particularly the white dashed lines in the middle of the road, and the shadows on the road from the cyclists, which clearly don't overlap, because they are some distance apart.
7. The misleading impression that is created by taking head-on photographs using a telescopic narrow angle lens, and how this compresses the image to make it appear that cyclists are riding in a group when they are not, is explained and demonstrated in an article by Road CC <https://road.cc/content/news/times-latest-paper-try-shame-cyclists-dodgy-pics-272525> including a series of photographs showing a telescopic shot and a wide angle shot, with a photograph used by the Times last weekend showing cyclists on Box Hill in Surrey taken with a telescopic lens, next to a photograph taken with a wide angle lens.
8. The effect and implications of using a telescopic lens would have been known to the photographer. It has been used to bolster an inaccurate story and dangerous narrative, namely that it is somehow wrong and in breach of the guidance and regulations to cycle outside during the COVID-19 crisis, and that groups of cyclists are routinely breaching the social distancing guidelines. None of this is supported by the facts reported or the images used in this article.

Complaint 2

The first complaint concerned the behaviour of a journalist or photographer, and an article published by mirror.co.uk (Reach PLC) on 4 April 2020 under the headline:

“Cyclists ignore UK coronavirus lockdown rules as they ride together in the sun”
<https://www.mirror.co.uk/news/uk-news/cyclists-ignore-uk-coronavirus-lockdown-21812777>

In addition to the written content, I complained about the use of a photograph in the article with the caption:

“Cyclists exercise in close proximity today in Regent's Park in central London” (Image: Ben Cawthra/LNP)

I contended that both the article and photograph breached the accuracy clause of the Code for these reasons:

1. The Mirror headline refers to "Cyclists ignore UK coronavirus lockdown rules as they ride together in the sun". The article then states that "Brits are once again flouting UK coronavirus lockdown rules by gathering in parks, cycling in groups and enjoying the warm weather. Photos have emerged this afternoon of friends failing to socially distance as they cycled, walked or ran in close proximity to each other. Ruth May, Britain's chief nurse, had begged Brits to stay home during this weekend's warm weather to save more hero nurses from losing their lives to coronavirus. But in Regent's Park, central London, cyclists were pictured riding close together in the sunshine."
2. The article refers to people flouting the rules by exercising outdoors, but at no point in the article is any reference made to exercise outdoors being:
 - a. One of the permitted reasons under the regulations for people to leave their homes, and not be at home.
 - b. Recommended both via the Government Guidance and Public Health Agencies.
3. In relation to people cycling, the specific claim that cyclists were flouting the rules in Regent's Park was supported by a photograph credited to Ben Cawthra, with the caption "Cyclists exercise in close proximity today in Regent's Park in central London". The claims made regarding groups of cyclists in Regent's Park are however not supported by Ben Cawthra's photograph, which has clearly been taken with a telescopic long lens camera. This has created a foreshortened appearance, compressing the image of the subject cyclists so they appear closer together than they were.
4. As with another photograph taken by Ben Cawthra and published by the Mail Online on the same date, the photograph of the cyclists in Regent's Park is taken with a narrow perspective from head on. A photograph taken from the side view with a wide lens would have shown that the cyclists in question were observing the social distancing guidance (riding at least two metres apart) and would not have supported the contention that they were riding in a group.
5. The photograph has been taken to create a misleading impression and support a factually inaccurate narrative. Publication of the photograph in the context of an

article which inaccurately implies that exercise outdoors is somehow in breach of the regulations and guidance, unfairly and inaccurately suggests that those cyclists, others cycling in parks for their permitted and recommended exercise, and people choosing to cycle during the COVID-19 crisis were or are behaving irresponsibly, and potentially either illegally or contrary to guidance, all of which is incorrect.

6. In the absence of a wide angle photograph from a side on view, the distorted and compressed nature of the image is apparent from consideration of the road markings. These are cyclists waiting at a set of traffic lights. Consideration of the white line advanced stop lane markings shows that these cyclists appear to be more than two metres apart. There is no evidence to support the contention that this was a group of cyclists, as opposed to a number of individual cyclists complying with the social distancing guidelines and the Government guidance on exercise outdoors.
7. The misleading impression that is created by taking head-on photographs using a telescopic narrow angle lens, and how this compresses the image to make it appear that cyclists are riding in a group when they are not, is explained and demonstrated in an article by Road CC <https://road.cc/content/news/times-latest-paper-try-shame-cyclists-dodgy-pics-272525> including a series of photographs showing a telescopic shot and a wide angle shot, with a photograph used by the Times last weekend showing cyclists on Box Hill in Surrey taken with a telescopic lens, next to a photograph taken with a wide angle lens.
8. The effect and implications of using a telescopic lens would have been known to the photographer. It has been used to bolster an inaccurate story and dangerous narrative, namely that it is somehow wrong and in breach of the guidance and regulations to cycle outside during the COVID-19 crisis, and that groups of cyclists are routinely breaching the social distancing guidelines. None of this is supported by the facts reported or the images used in this article.

Rejection of my complaint by letter dated 24 April

Your email of 24 April indicated that both of my complaints had been rejected because neither “raise a possible breach of the editors’ code”.

Before dealing with the reasons why that conclusion has been reached, I would first submit that your suggestion that I have raised no possible breach of the Code is factually incorrect. It also demonstrates a fundamental flaw in the process for considering my complaints.

I have argued that in both articles, photos taken using a telephoto lens were used to create a misleading and inaccurate narrative. You have not sought to establish whether my contention regarding the use of telephoto lens photographs is accurate or not. The photographer and publishers have not been approached to answer that question. They have not been asked. You may choose to conclude that I have not proved that telephoto lenses were used, or that the images supported a distorted and inaccurate narrative, but IPSO simply can't say with any credibility that I have not raised a possible breach of the

Code, because you have made no inquiry, merely contending that I can't prove that which I assert.

Not being able to prove something and raising no possibility of a breach are entirely different assertions, and the fact that IPSO has not understood this justifies a review of my complaint.

Your stated reasons for concluding that no possible breach of the code has been raised are that:

1. I have "speculated that a telephoto lens had been used in order to purposefully make the cyclists look closer than they were", when I have "no evidence to suggest that this was the case, or that the cyclists were actually over 2 meters apart", finding that my position is "based merely on speculation".
2. That I could not prove that the articles were inaccurate in reporting that the cyclists were riding "together" or were in "formation", because I "had no connection to the cyclists". I was not there, so I am "not in a position to know if any of them had set out to cycle as a group".
3. That the words riding "together" or in "formation" does not only refer to people who have gathered purposefully as a group but can refer to "cyclists riding near to each other, as photographed here".
4. That omitting to mention that cycling is a permitted form of exercise and is allowed under government guidelines does not make either article inaccurate or misleading, because "Newspapers have the right to choose which pieces of information they publish, as long as this does not lead to a breach of the Code".

Grounds for review of the initial rejection (24 April) of my complaints

With reference to your four stated reasons for rejecting my complaints, I submitted grounds for review on 1 May as follows:

1. I have "speculated that a telephoto lens had been used in order to purposefully make the cyclists look closer than they were", when I have "no evidence to suggest that this was the case, or that the cyclists were actually over 2 meters apart", finding that my position is "based merely on speculation".

Response

You have rejected my complaints on the basis that I have no evidence to prove that the cyclists appeared in the pictures to be closer together than they were, when IPSO:

- a. Has received an independent complaint, not yet concluded, from a cyclist shown in one of the photographs, who has informed you that:

- The picture taken of him and his wife, with other cyclists (unknown to them) has been taken with a telephoto lens and is a distorted image.
 - The cyclists in that picture were not “riding together in the sun” as the headline asserts, or in contravention of any rules, but were stationary and had not been, nor did they subsequently, ride together.
 - Whilst the article refers to “Brits ...once again flouting UK coronavirus lockdown rules by gathering in parks, cycling in groups and enjoying the warm weather”, there were no groups riding in Regent’s Park that morning, and there were police vehicles patrolling the Outer Circle who took no action, as they had no reason to do so.
 - He and the others in the picture did not “ignore UK coronavirus lockdown rules” because the guidance allows “one form of exercise a day, for example a run, walk, or cycle - alone or with members of your household” and states, again as guidance, that when doing these activities you should be two metres apart from anyone outside of your household. The complainant has further stated that he and the other cyclists in the picture had come to a standstill (at a red light), but the use of a telephoto lens has distorted perspective to make it look like the individual cyclists are closer than they actually are.
 - The picture is taken at the junction of the Outer Circle (Ulster Terrace) with York Gate/York Bridge. The junction has plenty of space – the road markings can be inspected at the physical location to see the cyclists were all separated. However, the bokeh and perspective used in the photograph compresses the subjects and gives a false representation of what is happening.
 - The headline completes the deception. In this case, the misleading headline and article with the distorted image impute wrongdoing when there was none.
 - Whilst the article says: “photos have emerged this afternoon of friends failing to socially distance as they cycled, walked or ran in close proximity to each other.” It states that “in Regent’s Park, central London, cyclists were pictured riding close together in the sunshine”, but the image used was not of friends, because the other cyclists the complainant was pictured with were complete strangers to him and his wife. The clear inference is that the image is of friends that had decided to cycle together and not comply with social distancing when this was not the case.
- b. Has made no attempt to ascertain whether a telephoto lens was used. It would be reasonable in the circumstances to make that inquiry with the photographer or publisher.
- c. Has failed to consider the evidence that has been submitted already. Any photographer with experience of the use of telephoto lenses would be able to confirm that these photographs were taken with such a lens. The pictures are the evidence, if only you care to look or inquire. It shouldn’t be for me as the complainant to prove this by producing the image metadata or the camera that was used, because I can’t. It would be reasonable in the circumstances for IPSO to also submit these pictures to an experienced independent photographer, asking whether these look like photos taken with a telephoto

lens and, if so, to set out the implications with regard to the contention that this has made it appear that the cyclists were closer together than they really were.

2. That I could not prove that the articles were inaccurate in reporting that the cyclists were riding “together” or were in “formation”, because I “had no connection to the cyclists”. I was not there, so I am “not in a position to know if any of them had set out to cycle as a group”.

Response

Please see my response to point 1 above. You have evidence in the form of the published photographs. You also have another complainant who has explained what happened, but you have declined to make further inquiry with the photographer or publishers.

3. That the words riding “together” or in “formation” does not only refer to people who have gathered purposefully as a group but can refer to “cyclists riding near to each other, as photographed here”.

Response

This argument is not compliant with the spirit of the Code, which is supposed to be “honoured not only to the letter, but in the full spirit”. Both articles created the impression that people had set out to ride together, in breach or guidelines and regulations, and that they were, in layman’s terms, in a group. To argue, as IPSO have, that “together” or “in formation” might mean something else is semantic, disingenuous, and not in keeping with the spirit of the Code.

4. That omitting to mention that cycling is a permitted form of exercise and is allowed under government guidelines does not make either article inaccurate or misleading, because “Newspapers have the right to choose which pieces of information they publish, as long as this does not lead to a breach of the Code”.

Response

Please see my response to point 3 above. This response is not in keeping with the spirit of the Code. To omit reference to certain facts and guidance whilst distorting others with a misleading image is just as dishonest as a direct assertion of an untruth. It is deeply disappointing that IPSO are attempting to apply the letter of the Code, rather than the spirit, declining to ask any difficult questions of the photographer or publisher, and adopting a laissez faire approach to the omission of crucial information which would have prevented the promotion of an inaccurate story.

Determination of my complaints – letter 28 May

You replied to my application for a review dated 1 May by email dated 28 May, confirming that the Committee had considered my complaint, referencing the email of 24 April from

IPSO's Executive notifying you of its view that the complaint did not raise a possible breach of the Code, and my email of 1 May requesting a review of the Executive's decision. You set out the Committee's decision as follows:

"The Committee noted your point that people are allowed under the Coronavirus to go outside to exercise. However, according to government advice rules (at the time), exercise should be done "only by yourself or within your household, not in groups" and should be done locally. Therefore, it was not significantly misleading to state that groups of cyclists riding "together", "in close formation" or "in close proximity" were ignoring the coronavirus lockdown rules.

"With regard to your claim that these cyclists were not in "close proximity" at all, as the photo was distorted, the Committee agreed with the Executive. Your position was based on speculation, evidenced by your stating that the cyclists "appear" to be more than two metres apart in the photo.

"You mentioned that you know of another complaint having been made about these articles. Please note that the Committee assessed your complaint alone. Complaints to IPSO about the same article from different individuals are assessed separately.

"For this reason, and the reasons already provided by IPSO's Executive, the Committee declined to re-open your complaint."

Grounds for requesting a review by the Reviewer due to a substantial flaw in process

As outlined in my email of 1 May, the preamble to the Code <https://www.ipso.co.uk/editors-code-of-practice/> makes it clear that it is essential that 'the Code should be honoured not only to the letter, but in the spirit'. The preamble also explains that the Code is intended to set the framework for the highest professional standards that members of the press subscribing to IPSO have undertaken to maintain.

The preamble and purpose behind the Code are important, because the Committee's decision dated 28 May is premised on the basis that my complaint is based on speculation, as evidenced by me stating that evidenced by your stating that "the cyclists "appear" to be more than two metres apart in the photo."

The IPSO handbook <https://www.ipso.co.uk/media/1547/handbook-aug-18.pdf> makes it clear (page 6) that whilst the Committee formally considers complaints framed under the numbered clauses of the Code, that it does so against the background set out in the preamble to the Code. It also makes clear (page 18) that IPSO does not operate formal rules of evidence, but the Committee is required to, as best as it can, identify areas in which there is a factual dispute between the complainant and publication that has a bearing on the judgment it is required to make as to whether the Code has been breached,

including assessing the evidence that has been provided to it by the parties or otherwise obtained by the Executive through the investigation process.

In considering the evidence either provided to it or obtained by IPSO, the Committee are directed to bear in mind the principle that the burden is on publications to demonstrate that they have taken care to comply with the Code (page 19 IPSO handbook). The handbook also confirms (page 19) that the Committee's decisions should reflect the summary of the parties' positions, the key evidence and arguments that have been submitted to it, and in the findings identify clearly whether a breach has been established in relation to each Clause under complaint; set out comprehensively the reasons for the Committee's judgment as to whether a breach has been established; and explain what evidence it has relied on to reach that judgment and, where appropriate, the reasons why evidence submitted by either party has not been accepted.

Having regard to the purpose of the Code, the process and procedures for considering evidence as set out above, and the fundamental requirements of any transparent and objective regulatory process, the Committee's decision to reject my complaints is substantially flawed because:

1. The Committee has misdirected itself, proceeding on the premise that the burden is upon me, as the complainant, to prove the facts asserted. It is inconsistent with the spirit of the Code, and IPSO's own stated processes to reject my complaint on the basis that I have 'speculated' about the published photographs when:
 - a. No attempt has been made to clarify or investigate the evidence I have submitted, or make inquiries with the photographer or publisher to ascertain whether a telephoto lens was used. There has been no inquiry in this case. Instead, the regulator has defaulted to requiring me to prove beyond any doubt the accuracy of photographs I do not possess, which the Committee could have requested from the publishers.
 - b. The Committee has failed to consider the evidence that has been submitted already. Any photographer with experience of the use of telephoto lenses would be able to confirm that these photographs were taken with such a lens. The pictures are the evidence, but the Committee has abrogated its responsibility to inquire further. It would be reasonable in the circumstances for IPSO to also submit these pictures to an experienced independent photographer, asking whether these appear to be photos taken with a telephoto lens, and if so how the implications of this having regard to my submission that this has made it appear that the cyclists were closer together than they really were.
 - c. IPSO has received an independent complaint, not yet concluded, from a cyclist shown in one of the photographs, who has informed you that:

- The picture taken of him and his wife, with other cyclists (unknown to them) has been taken with a telephoto lens and is a distorted image.
- The cyclists in that picture were not “riding together in the sun” as the headline asserts, or in contravention of any rules, but were stationary and had not been, nor did they subsequently, ride together.
- Whilst the article refers to “Brits ... once again flouting UK coronavirus lockdown rules by gathering in parks, cycling in groups and enjoying the warm weather”, there were no groups riding in Regent’s Park that morning, and there were police vehicles patrolling the Outer Circle who took no action, as they had no reason to do so.
- He and the others in the picture did not “ignore UK coronavirus lockdown rules” because the guidance allows “one form of exercise a day, for example a run, walk, or cycle - alone or with members of your household” and states, again as guidance, that when doing these activities you should be two metres apart from anyone outside of your household. The complainant has further stated that he and the other cyclists in the picture had come to a standstill (at a red light), but the use of a telephoto lens has distorted perspective to make it look like the individual cyclists are closer than they actually are.
- The picture is taken at the junction of the Outer Circle (Ulster Terrace) with York Gate/York Bridge. The junction has plenty of space – the road markings can be inspected at the physical location to see the cyclists were all separated. However, the bokeh and perspective used in the photograph compresses the subjects and gives a false representation of what is happening.
- The headline completes the deception. In this case, the misleading headline and article with the distorted image impute wrongdoing when there was none.
- Whilst the article says: “photos have emerged this afternoon of friends failing to socially distance as they cycled, walked or ran in close proximity to each other.” It states that “in Regent’s Park, central London, cyclists were pictured riding close together in the sunshine”, the image used was not of friends, because the other cyclists the complainant was pictured with were complete strangers to him and his wife. The clear inference is that the image is of friends that had decided to cycle together and not comply with social distancing when this was not the case.

You indicate in your letter of 28 May that whilst I have referred to another complaint having been made about these articles, that the Committee assessed my complaint alone, and that complaints to IPSO about the same article from different individuals are assessed separately.

I accept the inherent logic of complaints being dealt with individually, however, where IPSO is made aware of external evidence, as it was in this case, there is a compelling argument that further inquiry or investigation should be considered. The failure to do so in this case is a substantial flaw in process. IPSO and the Committee have turned a blind eye to the telescope and responded to a complaint by effectively telling me I can’t

prove it. That is a flagrant breach of the spirit of the Code, and a substantial flaw in process.

2. The Committee has failed to address adequately or at all the points and submissions already made about both process and the need for further inquiry. In my letter of 1 May (before I was aware that a request for review could ultimately be made to the Reviewer under regulation 32 where there has been a substantial flaw in process), I set out grounds upon which the initial rejection of my complaint was “fundamentally flawed” as follows:

“Before dealing with the reasons why that conclusion has been reached, I would first submit that your suggestion that I have raised no possible breach of the Code is factually incorrect. It also demonstrates a fundamental flaw in the process for considering my complaints.

I have argued that in both articles, photos taken using a telephoto lens were used to create a misleading and inaccurate narrative. You have not sought to establish whether my contention regarding the use of telephoto lens photographs is accurate or not. The photographer and publishers have not been approached to answer that question. They have not been asked. You may choose to conclude that I have not proved that telephoto lenses were used, or that the images supported a distorted and inaccurate narrative, but IPSO simply can't say with any credibility that I have not raised a possible breach of the Code, because you have made no inquiry, merely contending that I can't prove that which I assert.

Not being able to prove something and raising no possibility of a breach are entirely different assertions, and the fact that IPSO has not understood this justifies a review of my complaint.”

None of those points have addressed within your rection letter of 28 May. The complaints process has, thus far, involved me as the Complainant:

- a. Raising concerns which IPSO have declined to investigate.
- b. Submitting arguments which IPSO have ignored and failed to respond to.
- c. Having my complaints rejected without any objective or impartial analysis of their merit.

I therefore request that this matter be referred to the Reviewer to consider my request for a review pursuant to regulation 32.

I look forward to hearing back in due course.

Duncan Dollimore

June 2020