First-tier Tribunal
(General Regulatory Chamber)
Information Rights

Appeal Reference: EA/2019/0369

Decided without a hearing

BEFORE

JUDGE DAVID THOMAS

TRIBUNAL MEMBERS DAVE SIVERS AND DAVID WILKINSON

BETWEEN

GABRIEL WEBBER

Appellant

and

THE INFORMATION COMMISSIONER

Respondent

DECISION AND REASONS

The appeal is allowed. The London Borough of Barnet must disclose the withheld information within the later of 28 days or an unsuccessful appeal to the Upper Tribunal.

NB Numbers in [square brackets] refer to the open bundle

1. This is the appeal by Mr Gabriel Webber against the rejection by the Information Commissioner (the Commissioner) on 7 October 2019 of his complaint that the London Borough of Barnet (the Council) had wrongly refused to disclose certain information to him under section 1(1)(b) Freedom of Information Act 2000 (FOIA).

2. Mr Webber initially opted for an oral hearing. However, in his Reply he indicated he would be content with a paper determination if the Council was not joined (as it has not been) and the Commissioner would not attend a hearing. That conditional

change of heart may have been reinforced by the difficulty of listing oral hearings during the Covid-19 emergency. In any event, the Tribunal is satisfied that it can properly determine the issues without a hearing within rule 32(1)(b) of The Tribunal Procedure (First-tier Tribunal) (General Regulatory Chamber**)** Rules 2009 (as amended). [1] The panel communicated remotely but in real time.

The background

3. The case concerns enforcement of parking laws by a local authority.

4. Included in the appeal bundle are samples of (i) Penalty Charge Notices (PCNs) which the Council issues under different legislation **[84, 91 and 100]**; (ii) an Enforcement Notice (where a PCN has not been paid) **[87]**; and (iii) a Notice to Owner (again where a PCN has not been paid) **[95]**. In most cases, the forms explain that there are statutory grounds for challenging the notice (for example, that the recipient had never been the owner of the vehicle or there was no breach of the relevant law) but that representations can be made on other grounds too. If the statutory grounds are made out, the notice has to be cancelled; otherwise, the Council has a discretion. The Council has produced standard-form paragraphs relevant to exercise of its discretion.

5. In either case, appeals from the Council's decision may be made to an independent adjudicator.

The request and the Council's response

6. In early November 2018, Mr Webber made the following request of the Council:

> '*Please can I ask for an electronic copy of all template letters, paragraphs etc used in responding to (i) informal challenges and (ii) formal representations*'.

7. Viewed in isolation, this makes little sense but the context becomes clearer from an email Mr Webber had sent the Council on 2 October 2018 **[52]**, in which he had made a multi-part FOIA request relating to PCNs issued by the Council. Regrettably, he had ended that email on a sarcastic note: 'I know this is a moderately complicated request but you can do it. I know you can. I have faith'.

8. The Council responded to the November request on 16 January 2019 **[53]**. It disclosed some 129 standard-form paragraphs available to its enforcement officers when making decisions following representations about the issue of PCNs but withheld seven, relying on section 31(1)(c) FOIA. [2] Section 31 is a qualified

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[1] SI 2009 No 1976

[2] '(1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice –

…

(c) the administration of justice'

exemption and the Council explained why the public interest favoured withholding the seven paragraphs.

9. Mr Webber asked for an internal review the same day **[56]** but in a full response on 12 February 2019 the Council maintained its refusal to disclose the seven paragraphs **[57]**. However, it changed horses from section 31(1)(c) to section 31(2)(c) (see below).

Proceedings before the Commissioner

10. Mr Webber submitted a complaint to the Commissioner on 14 February 2019 **[66].**

11. Prompted by the Commissioner, the Council subsequently explained to Mr Webber, in an email dated 2 August 2019 **[60]**, that it was relying on section 31(2)(c) via section 31(1)(g) (see below). It also explained that, in relation to one of the withheld paragraphs (the third withheld paragraph [3]), it was relying on the exemption in section 31(1)(a) (see below).

12. There is some confusion as to whether, in relation to this paragraph, it is also relying on section 31(2)(c). The Commissioner assumed that it was because, in her decision, she said that she did need to consider section 31(1)(a) given her conclusion that the Council could rely on section 31(2)(c). By contrast, the Council indicated in its annotations to the withheld paragraphs (disclosed to the Tribunal as closed material) that it was relying only on section 31(1)(a) for the third withheld paragraph. The Tribunal has nevertheless assumed that it intended to rely on section 31(2)(c) as well for this paragraph. Given that it is allowing Mr Webber's appeal on section 31(2)(c), the Tribunal is obliged to consider section 31(1)(a) in relation to that paragraph. [4]

13. With the same email to Mr Webber, the Council released an additional paragraph, bringing those released to 130 and leaving six still in issue. The Tribunal will refer to those six as 'the withheld information' or 'the withheld paragraphs'.

14. The Commissioner raised detailed questions of the Council on 8 July 2019 **[73]** and the Council gave equally detailed replies on 2 August 2019 **[79]**. Most of the Council's reply is in the open bundle but some passages have been redacted along with the withheld information through a rule 14 direction.

15. The Tribunal notes that, in her Decision, [5] the Commissioner said that the Council 'has explained that there is a very strong public interest in withholding information that could assist in fraudulent practices, specifically in the case of Blue Badge fraud'.

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[3] Rather confusingly, in its email to the ICO of 2 August 2019, the Council refers to the withheld paragraph as No 4. It appears as No 3 on its spreadsheet in the closed material. It consists of 10 lines

[4] *Information Commissioner and Malnick v Advisory Committee on Business Appointments* GIA/447/2017; [2018] UKUT 72 (AAC) (1 March 2018)

[5] Para 50. The Commissioner made the same point in her Response to the Grounds of Appeal **[31, 40]**

During the course of the appeal, the Council asked for three references to Blue Badge fraud to be redacted from its 2 August 2019 email. However, the cat was by then out of the bag that part of its concern related to Blue Badge misuse.

The Commissioner's decision

16. The Commissioner gave her decision on 7 October 2019 **[1]**. She held that the Council was entitled to rely on a combination of section 31(1)(g) and 31(2)(c) in relation to the withheld paragraphs and that the public interest favoured withholding them.

The pleadings

17. In his Grounds of Appeal **[21, 22]**, Mr Webber identified two respects in which the Commissioner had fallen into error: (i) in her assessment of the public interest and (ii) in failing to attach sufficient weight to, and/or misconstruing, the legal authorities on which he had relied. The second ground also, in fact, relates to the assessment of public interest, such that he was really relying on a single ground. He did not dispute that section 31(2)(c) (via section 31(1)(g)) or section 31(1)(a) were engaged. That is perhaps not surprising given that he has not, of course, seen the withheld information and was therefore not in a position to assess whether the prejudice threshold would be crossed by disclosure. The Tribunal has an inquisitorial function and will consider engagement as well as public interest.

18. In her Response dated 12 November 2019 **[31]**, the Commissioner essentially repeated the points she had made in her Decision. Mr Webber gave a detailed commentary on the Response in his Reply dated 15 November 2019 **[47]**.

Discussion

Section 31 FOIA

19. Section 31 FOIA provides:

> *'(1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice –*
>
> *(a) the prevention or detection of crime*
>
> *…*
>
> *(g) the exercise by any public authority of its functions for any of the purposes specified in subsection (2)*
> *…'.*
>
> *(2) The purposes referred to in subsection (1)(g) to (i) are –*
> *…*
> *(c) the purpose of ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise*

…'.

Summary of the issues

20. The Tribunal considers four issues: (i) is section 31 potentially in play? (ii) if so, is the Council entitled to rely on section 31(2)(c) (via section 31(1)(g)) in relation to the withheld paragraphs (in other words, are they engaged)?; (iii) similarly, is it entitled to rely on section 31(1)(a) in relation to the third withheld paragraph?; and (iv) assuming that section 31(2)(c) and/or section 31(1)(a) are engaged, where does the public interest lie?

Issue 1: is section 31 potentially in play?

21. Section 31 only applies if section 30 does not. It follows that the first question is whether the latter applies in this case.

22. Section 30 is headed *Investigations and proceedings conducted by public authorities*. It applies to information relating to specific investigations which a public authority has conducted or has a duty to conduct. Mr Webber's request does not relate to a specific investigation but rather to information held by the Council for the purposes of dealing with challenges to PCNs in general.

23. It follows that there is no bar to the Council relying on section 31.

Issues 2 and 3: is section 31(1)(a) and/or section 31(2)(c) (via section 31(1)(g)) engaged?

24. As noted, the Council relies primarily on section 31(2)(c) (via section 31(1)(g)), and on section 31(1)(a) in relation to the third withheld paragraph. It is convenient to deal with the two issues together in the open decision.

25. Section 31 is a prejudice-based exemption: a public authority must show that there would, or would be likely to be, prejudice in a relevant respect from release of the withheld information.

26. It is an oddity of section 31 and other prejudice-based exemptions that it is engaged either when disclosure *would* prejudice the relevant interests or when it would be *likely* to do so. Since the lesser threshold ('would be likely to') is always available, it is not obvious what function the higher threshold ('would') has. In the present case, the Council (not surprisingly) relies on the 'would be likely to' limb, although it suggests that the degree of likelihood of prejudice is exceptionally high. [6]

27. In *CAAT v Information Commissioner and the Ministry of Defence*, [7] a case on section 27 FOIA (international relations), the Tribunal said:

[6] See the Council's email of 2 August 2019 to the ICO **[79, 81]**
[7] EA/2011/0109

'*As a matter of approach the test of what would or would be likely to prejudice relations or interests would require consideration of what is probable as opposed to possible or speculative. Prejudice is not defined, but we accept that it imports something of detriment in the sense of impairing relations or interests or their promotion or protection and further we accept that the prejudice must be "real, actual or of substance", as described in* ***Hogan*** *[8]*
We do not consider that prejudice necessarily requires demonstration of actual harm to the relevant interests in terms of quantifiable loss or damage'.

The present Tribunal adopts this general approach, with necessary modifications for section 31.

28. The civil standard of proof applies to both the 'would' and 'would be likely to' limbs, such that the exemption is engaged if, on the balance of probabilities, prejudice would be likely to be caused. That inevitably lowers the threshold still further.

29. Section 31(2)(c) is a somewhat clumsy provision. Because it is contingent on section 31(1)(g), which is itself governed by the introductory words to section 31, the conglomerate question for the Tribunal may be posed thus: 'Would release of one or more of the withheld paragraphs be likely to prejudice the exercise by the Council of its function for the purpose of ascertaining whether circumstances which would justify regulatory action in pursuance of any enactment exist or may arise?'. That is indeed a mouthful. Breaking it down, the essential question is whether release would make it more difficult for the Council to decide whether to take regulatory action in relation to parking offences.

30. It may be said that, by the time use of any of the withheld paragraphs becomes relevant, the Council has *already* decided to take regulatory action – it has issued a PCN. That would, however, be to take too narrow a view of section 31(2)(g) in the present context, for two reasons. First, the Council's case, in relation to a number of the withheld paragraphs, is that release might encourage unscrupulous motorists to modify their behaviour so as to avoid a PCN or be able confidently to challenge one which is issued. Second, and more importantly, the phrase 'justify regulatory action' in paragraph (g) is wide enough to encompass a decision whether to *maintain* a PCN, not simply to issue it in the first place.

31. The Tribunal accepts, therefore, that the circumstances of the present case are capable of engaging section 31(2)(c) (via section 31(1)(g)). Similarly, they are capable of engaging section 31(1)(a) (the prevention or detection of crime), which is not mediated through section 31(1)(g).

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[8] *Hogan and Oxford City Council v Information Commissioner* EA/2005/0026 (17 October 2006) at [30]. *Hogan*, importantly, was a case about section 31. The reference to 'real, actual or of substance' emanated from the Minister sponsoring the Freedom of Information Bill in the House of Lords, Lord Falconer of Thoroton QC: Hansard HL vol 162 col 827 (20 April 2000)

32. The Tribunal must still consider, however, whether each of the withheld paragraphs does meet the likelihood of prejudice threshold. It has concluded that all but one do, as set out in the Closed Annex to this decision. That includes section 31(1)(a) in relation to the third withheld paragraph. The issue is academic in the sense that the Tribunal has also decided that, to the extent that the paragraphs do engage section 31(1)(a) and/or section 31(2)(c), the public interest is in favour of disclosure. However, engagement remains relevant if the Council wishes to seek permission to appeal in relation to non-engagement of one paragraph as well as public interest.

Issue 4: the public interest

33. The Council's position on public interest, supported by the Commissioner, may be summarised as follows. The parking enforcement paragraphs (including the withheld paragraphs) do not constitute policy but are rather tools for parking enforcement officers to use if they choose. They are not mandatory and can be ignored or edited. Not all the withheld paragraphs have necessarily been used. The paragraphs might change from time to time. Although those which have been used will, of necessity, have been sent to the motorists concerned and those motorists are free to publish them, to release them as template paragraphs gives them an enhanced status and is liable to encourage unscrupulous motorists to alter their parking behaviour and/or to tailor representations, including dishonestly, to maximise their chances of escaping a PCN. The paragraphs relate to specific situations, and therefore provide an insight into when the Council might exercise its discretion to waive a PCN.

34. The Council accepts that the public has an interest in understanding how it enforces parking regulations and in transparency about how it conducts its affairs in general but says that this is outweighed by the additional difficulty in enforcement which release of the withheld paragraphs would lead to. It claims to publish more than most local authorities in England and Wales about parking enforcement. [9]

35. Since the Council has released 130 paragraphs, it follows that it does not fear adverse consequences from the public knowing *their* content and the fact that they are templates. On the Council's case, there must, therefore, be something about the withheld paragraphs which puts them in a separate category. It is not always clear what that something might be.

36. The question whether the template paragraphs, including the withheld paragraphs, constitute policy is crucial. This is because, as Mr Webber has pointed out, there is high authority that good administration normally requires that policies operated by public bodies are made public. For example, in the Court of Appeal case of *Walmsley v Transport for London and others*, [10] Sedley LJ said:

[9] See its email of 2 August 2019 to the ICO **[79, 83]**
[10] [2005] EWCA Civ 1540

'56. It has emerged during the course of these proceedings that [Transport for London] has for some time had a policy of waiving fines in meritorious cases falling outside the prescribed grounds for appeal. For the reasons I have mentioned … this is to be welcomed …

57. It is not part of this court's task to say what such a policy should contain. But it is right to say that it is inimical to good public administration for a public authority to have and operate such a policy without making it public: see R v Home Secretary, ex parte Urmaza [1996] COD 479. It also exposes such an authority to the risk of lawsuits based on ignorance of how it has gone about taking the material decision. In any such proceedings the policy would probably have to be disclosed …

58. … [TFL's] counsel … has pointed out the risk that publishing a set of guidelines on the discretionary waiver of fines will encourage some people, perhaps quite a lot of people, to fabricate excuses which will fall within the guidelines. But it is clear that a very large number of people – the majority, we are told … - write in any way with non-scheduled reasons, true or false, for letting them off their fines. TFL has to make up its mind what to do about each of these: whether to accept the excuse or to investigate it, and if the latter, how far. It may be that an increase in such submissions is a price that has to be paid for being fair to the public. For it is unfair that those who, despite the absence of any indication that they can do so, write to TFL, in the hope of clemency, at present obtain an advantage over those who assume, from looking at the Regulations, the penalty charge notice, the appeal form and TFL's website, that there is no way of doing any such thing, and pay a fine which they ought not in fairness to be required to pay'.

37. Both of the other judges agreed with these remarks. Strictly speaking, they are *obiter* (not necessary for the decision) and are therefore not binding on the Tribunal: the particular issue which the Court of Appeal had to decide was whether an adjudicator was limited, under regulation 16(2) of the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, [11] to giving directions in relation to the statutory grounds of challenge or whether they could consider non-statutory grounds as well. However, the remarks echo others of high authority. For example, in *R (Lumba) v Secretary of State for the Home Department*, [12] Lord Dyson in the Supreme Court said: [13]

'*The rule of law calls for a transparent statement by the executive of the circumstances in which … broad statutory criteria will be exercised … The individual has a basic public law right to have his or her case considered under whatever policy the executive sees fit to adopt … There is a corelative right to know what that currently existing policy is, so that the individual can make relevant representations in relation to it … Notice is required so that the individual knows the criteria that are being applied and is able to challenge an adverse decision*'.

[11] SI 2001/2313
[12] [2012] 1 AC 245
[13] At [34]-[35]

38. Lord Dyson approved [14] the statement of Stanley Burnton J in *R (Salih) v Secretary of State for the Home Department* [15] that 'it is in general inconsistent with the constitutional imperative that statute law be made known for the government to withhold information about its policy relating to the exercise of a power conferred by statute'.

39. Policies do not invariably have to be made public. No one would expect the Government necessarily to publish policies relating to national security, or the investigation of serious crime. *Lumba* and *Salih* were immigration cases, where different considerations could, in principle, apply to the enforcement of parking offences. However, what is striking about *Walmsley* is that the subject-matter – fixed penalties for non-payment of the London congestion charge – is closely analogous to fixed penalties for parking offences.

40. The prior question remains whether the withheld paragraphs constitute policy. 'Policy', in this context, is not a term of art. It is not defined in legislation, and does not appear to have been defined in caselaw. This is no doubt because, just as with an elephant, everyone thinks they know what a policy is even if they might struggle to define it. In the Tribunal's view, it may be described as a set of guidelines intended to steer decision-making in particular circumstances. It is of the essence of a policy that it is not designed to be followed slavishly. Indeed, in public law the slavish following of a policy, with no heed paid to the particular circumstances, is unlawful, constituting a fetter on the exercise of discretion.

41. In the Tribunal's judgment, the withheld paragraphs, just like those which have been disclosed, constitute the Council's policies about the circumstances in which they will maintain or revoke a PCN. The Council, whether at member or delegated officer level and no doubt with legal input, has gone to extraordinary lengths to address every conceivable circumstance on which motorists may rely in challenging a PCN. It clearly expects its enforcement officers to apply the guidance represented by the paragraphs, unless there is a good reason not to. It would be absurd to suggest that they begin with a blank sheet of paper in each case. The paragraphs, disclosed and withheld, do not mandate a particular decision but they strongly suggest what it should be, absent unusual factors, once it is determined that the relevant circumstances apply. That is how consistency and fairness - bulwarks of public body decision-making - are achieved, and any tendency to discrimination minimised. Whether a PCN is upheld or revoked cannot depend on the lottery of which officer is assigned to a case or how generous that officer is feeling on a particular day. The paragraphs are more than the administrative tools suggested by the Council and the Commissioner.

42. Indeed, one of the withheld paragraphs begins: 'It is not Barnet Council's policy to [uphold a PCN in the circumstance then specified]'. Although expressed in the negative, what the paragraph is saying is: 'It is Barnet Council's policy [not to

[14] At [36]
[15] [2003] EWHC 2273 (Admin) at [52]

uphold a PCN in that circumstance]'. Since by its terms that paragraph, which is no different qualitatively from any of the other disclosed or withheld paragraphs, sets out a policy, that gives a strong indication that all the other withheld paragraphs, and indeed the disclosed ones, also set out policies. All the other paragraphs perform the same function as the one using the word 'policy'. They may not use the word but a rose by any other name would smell as sweet. Section 44 Marine and Coastal Access Act 2009 represents legislative recognition that it is substance which matters, not label: 'For the purposes of this Act a "marine policy statement" … is a document— (a) in which the policy authorities that prepare and adopt it state general policies of theirs (however expressed) for contributing to the achievement of sustainable development in the UK marine area …' (emphasis added).

43. Many of the withheld paragraphs stress that much depends on the facts of the individual case, but that is entirely consistent with their representing policy. So is the fact that the paragraphs may change: policy evolves.

44. Because the withheld paragraphs represent policy, Sedley LJ's remarks in *Walmsley*, though not formally binding on the Tribunal, are highly persuasive.

45. Indeed, as Mr Webber has pointed out, guidance issued by the Secretary of State for Transport [16] under section 87 of the Traffic Management Act 2000 (the guidance) encourages local authorities to be open about how they enforce parking offences so that motorists can know when to challenge a PCN. For example, paragraph 10.4 says:

> *'… [Enforcement authorities] should approach the exercise of discretion objectively and without regard to any financial interest in the penalty or decisions that may have been taken at an earlier stage in proceedings. Authorities should formulate (with advice from their legal department) and then publish their policies on the exercise of discretion. They should apply these policies flexibly and judge each case on its merits. An enforcement authority should be ready to depart from its policies if the particular circumstances of the case warrant it* (emphasis added)'.

46. The guidance is not binding but local authorities must have regard to it. [17]

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[16] *The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions* (2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/873752/statutory-guidance-local-authorities-enforcement-parking-contraventions-document.pdf

[17] Section 87 reads:

> *'(1) The appropriate national authority may publish guidance to local authorities about any matter relating to their functions in connection with the civil enforcement of traffic contraventions*
>
> *(2) In exercising those functions a local authority must have regard to any such guidance*
>
> *…'*

47. The emphasis on the importance of transparency in both caselaw and the guidance, though clearly a very weighty consideration, is not conclusive on the public interest question. The Tribunal has also taken into account the importance of the Council being able to enforce parking laws efficiently and fairly and of suppressing fraud. The streets of London are notoriously full and parking enforcement has an important role to play in safety, not only of other motorists but also of pedestrians, not least visually-impaired ones. It has an important role in pollution control, too, and in particular the maintenance of a semblance of clean air, and in the free flow of traffic. Disabled motorists are disadvantaged by able-bodied motorists parking in designated disabled bays and by Blue Badge fraud. Illegal parking is not simply not abiding by the rules but can represent a significant social ill; telling untruths to avoid a penalty is similarly a social ill, and can lead to strapped local authorities losing revenue to which they are properly entitled. It is notorious that parking fines excite a reaction amongst some motorists out of all proportion to the money involved, with the phrase 'breach of my human rights' liberally (and inappropriately) thrown around. Some people, no doubt, will lie in order to avoid fines. The Council's task in distinguishing between the deserving and the underserving, and the genuine and the fraudulent, is unenviable, but important.

48. The Tribunal has taken careful note of the Council's concern that disclosing the withheld paragraphs may encourage the unscrupulous to fabricate arguments to avoid having to pay a penalty, or conceivably to alter their parking behaviour so as to avoid a PCN in the first place. The Commissioner is wrong to imply, in paragraph 33 of her Response, that prejudice to the Council's parking enforcement functions is determinative of public interest. But it is an important consideration. However, as Sedley LJ said in *Walmsley*, that is a price which may have to be paid for transparency in public body decision-making, so that everyone knows where they stand. The Council has to distinguish between the genuine and the fraudulent as much with the paragraphs it has disclosed as those it has withheld.

49. The Tribunal has given particularly anxious consideration to the withheld paragraphs addressing Blue Badge fraud. It is common knowledge that such fraud is widespread and causes detriment to disabled drivers and the public purse. The Tribunal accepts that those withheld paragraphs engage the relevant parts of section 31. However, in assessing where the public interest lies, the Tribunal has put into the mix the only relatively small *additional* impetus which disclosure might give to Blue Badge fraud. It has concluded that the public interest still favours disclosure.

50. In assessing public interest, the Tribunal has given weight to the fact that, if the result of disclosure of a particular withheld paragraph is unacceptable level of abuse, the Council has the ability to adjust its policy by removing or tightening the paragraph. If not withdrawing a paragraph, it could stress that a motorist relying on a particular circumstance must discharge a high burden of proof to persuade it to revoke a PCN. It could say that the circumstances must be truly exceptional. It

could accompany disclosure to Mr Webber with statements of this sort on its website.

51. Withdrawing or tightening a policy represented by one of the withheld paragraphs would have an unfortunate impact on genuine motorists whose circumstances fall within its current scope. But genuine motorists who do not know about the Council's policies, because they are kept secret, may well not be taking advantage of them anyway.

52. The Tribunal has concluded that, in all the circumstances, the public interest falls firmly on the side of disclosure of each of the withheld paragraphs where engaged (and would fall on that side if it is wrong about the non-engagement of the remaining paragraph). Motorists are entitled to know in what circumstances a PCN is likely to be revoked.

Conclusion

53. For these reasons, the appeal is allowed. The decision is unanimous.

Judge of the First-tier Tribunal
Date: 15 June 2020
Date Promulgated: 17 June 2020