

IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE HIGH COURT OF JUSTICE
QUEEN’S BENCH DIVISION
DIVISIONAL COURT (Burnett LJ and Haddon-Cave J)
[2017] EWHC 1754 (Admin)

Appeal No: **T3/2017/2079(C)**
T3/2017/2079(D)

THE QUEEN
(on the application of Campaign Against Arms Trade)

Claimant/Appellant

-v-

THE SECRETARY OF STATE FOR INTERNATIONAL TRADE

Defendant/Respondent

-and-

AMNESTY INTERNATIONAL
HUMAN RIGHTS WATCH
RIGHTS WATCH (UK)

First Interveners

OXFAM

Second Intervener

WRITTEN SUBMISSIONS ON BEHALF OF OXFAM

INTRODUCTION

1. These written submissions are made on behalf of the Second Intervener, Oxfam, in accordance with the Order of Irwin LJ dated 13 July 2018, sealed by the Court on 16 July 2018 (“**the Order**”).
2. Oxfam is a well-known international aid and development organisation and humanitarian relief provider with 70 years of experience. It works and campaigns with partners in over 90 countries worldwide. The primary purpose for which Oxfam was established was to prevent and relieve poverty and to protect the vulnerable, including through humanitarian intervention.

3. Oxfam has operated in Yemen for more than 30 years, working with government authorities and civil society organisations to improve the water and sanitation services and livelihoods of thousands of people. During the armed conflict in Yemen, Oxfam has delivered humanitarian assistance (both emergency assistance and assistance targeted at rebuilding lives and communities) in response to acute needs. This work includes installing water and sewage systems at, *inter alia*, Médecins Sans Frontières facilities. Oxfam’s work on the ground in Yemen means that it has direct experience and knowledge of the actions of the Saudi-led coalition. It has also engaged in extensive advocacy, including with the British Government since April 2015, on issues of international law compliance in the Yemen conflict.

4. Paragraph 4 of Irwin LJ’s Order granted Oxfam permission to intervene by way of written submissions in respect of the ‘intervener issues’ as defined in paragraph 1 of the Order, namely:
 - (a) the position under international law with respect to the interpretation of the threshold of “*clear risk*” of a “*serious violation of international humanitarian law*”, found in Criterion Two of the Consolidated EU and National Arms Export Licensing Criteria; and
 - (b) the value and unique advantages of the NGO, UN and other third party reports filed as evidence of violations of international humanitarian law on the part of the Saudi-led coalition in Yemen, as well as the methodology underpinning them.

5. Oxfam has had sight of the submissions prepared by the First Interveners, and the skeleton argument for the Appellant. To avoid unnecessary duplication, these written submissions focus on two points falling within the scope of the intervener issues:
 - (a) the importance and value of a body of consistent evidence from reputable third parties (such as the UN), corroborated by multiple sources, of a pattern of systematic and serious violations of International Humanitarian Law (“**IHL**”); and

- (b) the correct application of the threshold test under Criterion 2(c) of a “*clear risk*” of “*serious violations*” of IHL, in the light of such a body of consistent evidence.

SUBMISSIONS

(1) Value of the consistent evidence provided by UN, NGO and other Third Party Reports

6. Before the Divisional Court the parties adduced a substantial number of “*third party*” reports, which document the devastating humanitarian impact of the conflict in Yemen. That evidence, which the Divisional Court noted “[*ran*] to many hundreds of pages”¹, is to some extent reflected in the detailed factual background set out in the Judgment at [61]-[85] & [134]-[135]. As the Divisional Court observed at [61] of the Judgment, the evidence originates from reputable sources, including: the United Nations; the European Parliament; the Council of the European Union; the International Committee of the Red Cross; Médecins Sans Frontières; Amnesty International; Human Rights Watch; House of Commons Committee; and the press. The reports relied upon reflect Oxfam’s own, largely direct, field experience in Yemen.
7. The case-law cited by the First Interveners emphasises, *inter alia*, that, in establishing what weight to attach to evidence from various reputable third party sources, there is a need to assess “*the consistency of their conclusions and their corroboration by other sources*”.² In *Saadi v Italy*, the Grand Chamber of the European Court of Human Rights held that the Court did not doubt the reliability of reports prepared by Amnesty International and Human Rights Watch because, *inter alia*: “*their conclusions are consistent with each other and [...] those conclusions are corroborated in substance by numerous other sources*”.³ The State’s evidence cannot “*simply... be taken at face value*”⁴ particularly when it has to be weighed against the totality of evidence available from reputable third party sources.
8. The third party evidence that was available to the Divisional Court concerning serious attacks on civilians / civilian sites in Yemen was compelling and convincing. It

¹ Judgment, [61]

² *NA v United Kingdom* (2009) 48 EHRR 15, §120.

³ *Saadi v Italy* [2008] ECHR 179; (2009) 49 EHRR 30, §143.

⁴ *MD (Ivory Coast) v Secretary of State for the Home Department* [2011] EWCA Civ 989, §46.

included the following consistent evidence of attacks on humanitarian relief and medical facilities, and targeting of entire regions.

(i) Attacks on humanitarian relief, including medical facilities

(a) The OHCHR report, *Situation of human rights in Yemen*, of 7 September 2015: recorded that, based on information available to date:

- i. 53 health facilities had been damaged or affected by the conflict;⁵
- ii. on 30 March 2015, the KSA-led forces had launched a number of airstrikes that hit the Al-Mazraq camp for internally displaced persons (where Oxfam works). This site was established by the UN in 2009.⁶ The attack was also recorded by the UN Expert Panel in January 2016, with updated figures for those who died or were injured (45 killed, and over 200 internally displaced persons injured).⁷ The attack destroyed, *inter alia*, the food area and clinic, i.e. civilian infrastructure.
- iii. A similar attack on an area hosting a high concentration of internally displaced individuals was reported to have taken place on 7 June 2015, with reports indicating that the attack killed four civilians, including three women, and injuring 41 civilians.⁸

(b) Evidence of the aerial bombing of a Médecins Sans Frontières facility in northern Yemen on 26 October 2015. The facility was hit twice.⁹ Médecins Sans Frontières confirmed that it had provided KSA with the hospital's GPS coordinates.¹⁰ Three further Médecins Sans Frontières facilities were attacked: on 2 December 2015 (a MSF mobile unit, wounding 8 people including 2 MSF staff, and killing 1 person nearby); 10 January 2016 (Shiara hospital, which

⁵ [SB3/25/C148].

⁶ §44, [SB3/25/C150].

⁷ UN: Final Report of the Panel of Experts on Yemen established pursuant to Security Council Resolution 2140 (2014) (as amended by Resolution 2216 (2015) (January 2016). [SB3/31/C235].

⁸ §52, [SB3/25/C151].

⁹ [SB3/26/C159-C162].

¹⁰ [SB3/26/ C162].

resulted in the deaths of 6 people and injured at least 7); and on 21 January 2016 (an MSF ambulance - its driver was killed, as were at least 6 others, and dozens were injured).¹¹

- (c) In January 2016, a UN Panel of Experts issued a report¹² which recorded that, for the period covered by the report, the Panel had documented 18 cases of airstrikes on medical facilities, either directly hitting or damaging them [SB3/31/250 *et seq.*]. While it was unable to independently verify these airstrikes, it documented at least 20 reports of such incidents at [SB3/31/C252-254]. By April 2016, the UN Secretary General's Report on *Children and armed conflict* confirmed that the United Nations had verified 101 incidents of attacks on schools and hospitals, 48% of which were attributable to the KSA-led coalition.¹³ In particular, airstrikes destroyed 15 health facilities in the governorate of Sa'dah.¹⁴
- (d) The aerial bombing of Abs Hospital on 15 August 2016.¹⁵ On 18 August 2016, Médecins Sans Frontières withdrew its teams from six hospitals in north Yemen. This followed the 15 August aerial bombing of Abs Hospital, which killed 19 people (including one MSF member) and injured 24. Médecins Sans Frontières decided it had to evacuate its staff from the hospitals in Sa'ada and Hajja because this was the fifth and deadliest attack on MSF-supported facilities, and there had been countless attacks on other health facilities and services in Yemen.¹⁶ Critically, these attacks occurred despite the fact that: (i) Médecins Sans Frontières had met with high ranking coalition officials to ensure humanitarian and medical assistance in Yemen; and (ii) the organisation had systematically shared the GPS coordinates of hospitals in which it worked with all parties to the conflict. Médecins Sans Frontières' own internal

¹¹ Médecins Sans Frontières release on *Yemen: Health facilities under attack – MSF wants answers – Access to health care for people affected by war must be guaranteed*, of 25 January 2016 [SB3/30/C197-198]. See also the BBC report, *Practising medicine under fire in Yemen*, 24 February 2016, [SB1/36/C266-275]. See also <https://www.msf.org/yemen-health-facilities-under-attack-msf-wants-answers>.

¹² UN: Final Report of the Panel of Experts on Yemen established pursuant to Security Council Resolution 2140 (2014) (as amended by Resolution 2216 (2015) (January 2016), see also 67 & 108 of the Judgment.

¹³ § 169, [SB3/37/C278-279].

¹⁴ § 170, [SB3/37/C279]. See also the UN Committee on the Rights of the Child report, §38 [SB3/39/C302-303].

¹⁵ Noted at [77(ii)] & [81(iii)] of the Judgment.

¹⁶ [SB1/10/B319-322].

investigation¹⁷ found that, following an initial hit to a vehicle just outside the hospital at 3.40pm, the organisation contacted the KSA-led coalition's operations cell and requested that they stop bombing the area, which took hours to occur. The bomb landed within a hospital complex that lies within an enclosed and gated area, that had the MSF logo at the entrance and the MSF logo painted on the roof of several buildings. This incident was also subject to detailed analysis, alongside other air strikes, in the 2017 UN Expert Panel Report (see evidence at [SB3/45/C338-C344 & C383-388]).

(ii) Targeting of entire regions

- (a) In its June 2015 report, *Targeting Saada, Unlawful Coalition Airstrikes on Saada City in Yemen*.¹⁸ Human Rights Watch documented several attacks on civilian targets across Sa'dah between March and May 2015, which included an attack on residential houses, two attacks that struck markets and an attack on a school.¹⁹ The attacks on residential houses killed at least 51 people, including 14 women and 32 children.²⁰
- (b) In January 2016, a UN Panel of Experts issued a report²¹ which recorded, *inter alia*, that:

140. On 8 May, the entire city of Sa'dah and region of Maran were declared 'military targets' by the coalition. Sa'dah remains one of the most systematically targeted and devastated cities in Yemen, attributable to coalition airstrikes and the targeting of the entire city in direct violation of international humanitarian law... Sa'dah also faced systematic indiscriminate attacks, including on hospitals, schools and mosques. ..."

The resulting attacks affecting civilians are discussed in Annex 56 to the report [SB3/31/C236-C239]

¹⁷ [SB1/10/B324-335].

¹⁸ [SB3/22/C59-107].

¹⁹ [SB3/22/C70].

²⁰ [SB3/22/C77-88]. Human Rights Watch also issued a report in November 2015, setting out its findings following investigations in Yemen in July 2015. [SB3/27/C163-C187]

²¹ UN: Final Report of the Panel of Experts on Yemen established pursuant to Security Council Resolution 2140 (2014) (as amended by Resolution 2216 (2015) (January 2016)). [SB3/31/C213].

9. As set out in Josephine Hutton’s witness statement, which was before the Divisional Court, Oxfam operates one of the largest humanitarian programmes in Yemen, with approximately 185 staff working across eight of Yemen’s 23 governorates. Since the beginning of the conflict, Oxfam has provided direct support to over one million affected people.²² Ms Hutton’s statement explained:

5... More than a third of SLC air raids are said to have hit civilian sites. Civilian objects attacked include those indispensable to the survival of the civilian population, such as medical facilities, market-places, factories, ports, food warehouses, and water systems...

7. SLC airstrikes hit anywhere at any time, typically without advance warning. Where warnings have been given, they have involved the designation of entire cities as military targets, with the civilians being given but a few hours to evacuate. The UN continues to report the widespread and systematic nature of SLC air strikes, including the bombing of residential neighbourhoods, a fact our local staff in Sana’a and Al Hodeidah and beneficiaries have also confirmed.

8. It is Oxfam’s assessment, borne out of its on-the ground experience in the conflict, that many SLC [KSA led] airstrikes have been designed to intimidate the civilian population. At times, after days of quiet, airstrikes have hit the capital, Sana’a, without warning just minutes before Friday prayers; ...²³

10. The third party evidence before the Divisional Court was also consistent with the limited reporting provided by the Ministry of Defence (“**MOD**”) “tracker” and the IHL updates prepared by the Foreign & Commonwealth Office (“**FCO**”). For example:²⁴

- (a) The November 2015 IHL update raised particular concerns about an attack on a Médecins Sans Frontières hospital in Haidan on 25 October 2015;²⁵
- (b) The January 2016 IHL Update recorded a concern that: “two thirds of the allegations concerned attacks on hospitals”.²⁶ The January 2016 IHL Update recorded that “MoD has been unable to identify a legitimate military target for

²² §2.

²³ Internal references omitted.

²⁴ [SB3/44/C235-328].

²⁵ Crompton 1, §§60-62. See also [155] & [158] of the Judgment. Despite the alleged improved procedures to prevent a recurrence of such incidents, relied upon at [158] of the Judgment, this incident was followed shortly by the attack on 15 August 2016.

²⁶ Crompton 1, §§65A-66 [SB1/5/B159].

the majority of strikes” and referred to three allegations of strikes on Médecins Sans Frontières hospitals (on 26 October 2015, 2 December 2015 and 10 January 2016). It also noted that the Saudi processes governing ‘dynamic targeting’ are “*less robust*”.²⁷ Similar concerns about gaps in KSA targeting processes, particularly in relation to dynamic strikes, were raised in the February 2016 IHL Update.²⁸

11. Taken together, the evidence before the Divisional Court provided a compelling OPEN case of a pattern of serious violations of IHL by KSA in the relevant period. Such consistent evidence, from various bodies, provided reliable and corroborated concerns that KSA was engaging in indiscriminate attacks and/or, at least, was failing to take adequate steps to prevent unlawful attacks on, *inter alia*, medical facilities, which benefit from special protection under international law (see further below).
12. Despite setting out the background to the Appellant’s claim, which constituted some of the “*most striking material*”²⁹ before it, the Divisional Court dismissed the reliability and relevance of that evidence, at [201(ii)], as follows:

There is a significant qualitative difference between the risk analysis which the government agencies involved in the decision-making process are able to carry out, on the one hand, and the reports of the NGOs and press as to incidents in Yemen, on the other. The government system involves drawing upon, and drawing together, a large number of significant strands and sources of information, including evidence and intelligence not available to the public, NGOs or press, including through close contacts with the Saudi military. By contrast, the reports of the NGOs and press of incidents suffer from a number of other relative weaknesses. These include, that such organisations often have not visited and conducted investigations in Yemen, and are necessarily reliant on second-hand information. Moreover, ground witnesses may draw conclusions about airstrikes without knowledge of all the circumstances.

13. Oxfam agrees with the Appellant and First Interveners that this was not a lawful approach to the body of evidence before the Divisional Court. The consistent evidence available about past violations could not reasonably or lawfully be dismissed in this way. The Divisional Court recognised, at [86] of the judgment, that the materials

²⁷ *Ibid.* See also [159] of the Judgment.

²⁸ See [202] of the Judgment.

²⁹ Judgment, [63].

referred to in the Judgment “*represent a substantial body of evidence suggesting that the Coalition has committed serious breaches of [IHL].*” Nothing, at least in the OPEN material, is capable of displacing that conclusion. The Government would need to have provided truly compelling and overwhelming, concrete evidence to disprove the consistent findings by, amongst others, specialist UN bodies. This consistent body of evidence was not limited to “*open source*” material, as implied by [86] of the Divisional Court’s judgment: it was also corroborated by Oxfam’s witness evidence, which reflected Oxfam’s direct field experience.

14. In response to that consistent body of evidence, the Divisional Court was required to apply anxious scrutiny, both to (i) the third party evidence, and (ii) the evidence provided by the Government, before concluding whether the material relied on by the Secretary of State was capable of displacing the weight of consistent evidence provided by independent, third party sources. It was critical for the Divisional Court (and the Secretary of State before it) to assess that evidence having regard to the recognised legal approach for establishing serious violations of IHL. Without appropriate weight being given to that body of evidence, the risk-based, predictive analysis required by Criterion 2(c) could not be properly undertaken. This point is addressed further below.

(2) The relevance of the consistent body of evidence to applying Criterion 2(c)

15. Oxfam agrees with the Appellant’s interpretation of the term “*serious violations*” of IHL, which forms a critical element of the threshold test under Criterion 2(c). The test is whether there is a “*clear risk*” of a “*breach of a rule protecting important values*” involving “*grave consequences for the victim*”.³⁰
16. Thus, in assessing the relevant risk, the concept of what amounts to a serious violation of IHL is broader than the concept of war crimes and/or grave breaches of the Geneva Convention. It is vital that those concepts are not elided with the concept of serious violations of IHL. The importance of that distinction can be demonstrated by the incidents reported in the evidence that was before the Divisional Court and is summarised above.

³⁰ *Prosecutor v. Tadic*, Appeals Chamber, IT-94-1 Decision on Interlocutory Appeal on Jurisdiction §§91-94 and *Prosecutor v. Galic*, Trial Chamber, DC, IT-98-29-T §§106-108: see Appellant’s Skeleton, §55.

17. Article 8(2) of the Rome Statute of the International Criminal Court contains a comprehensive list of conduct amounting to 'war crimes'. Article 8(2)(a) lists conduct constituting a grave breach of the Geneva Conventions, namely:

(i) Wilful killing;

(ii) Torture or inhuman treatment, including biological experiments;

(iii) Wilfully causing great suffering, or serious injury to body or health;

(iv) Extensive destruction and appropriation of property, not justified by military necessity and carried out unlawfully and wantonly;

(v) Compelling a prisoner of war or other protected person to serve in the forces of a hostile Power;

(vi) Wilfully depriving a prisoner of war or other protected person of the rights of fair and regular trial;

(vii) Unlawful deportation or transfer or unlawful confinement;

(viii) Taking of hostages.

18. Article 8(2)(b) lists other types of serious violations of the laws and customs applicable in international armed conflict, which may constitute war crimes. The violations expressly or implicitly require an element of intent:

(i) Intentionally directing attacks against the civilian population as such or against individual civilians not taking direct part in hostilities;

(ii) Intentionally directing attacks against civilian objects, that is, objects which are not military objectives;

(iii) Intentionally directing attacks against personnel, installations, material, units or vehicles involved in a humanitarian assistance or peacekeeping mission in accordance with the Charter of the United Nations, as long as they are entitled to the protection given to civilians or civilian objects under the international law of armed conflict;

(iv) Intentionally launching an attack in the knowledge that such attack will cause incidental loss of life or injury to civilians or damage to civilian objects or widespread, long-term and severe damage to the natural environment which would be clearly excessive in relation to the concrete and direct overall military advantage anticipated;

(ix) *Intentionally directing attacks against buildings dedicated to religion, education, art, science or charitable purposes, historic monuments, hospitals and places where the sick and wounded are collected, provided they are not military objectives;*

...

(xvi) *Pillaging a town or place, even when taken by assault;*

...

(xxiv) *Intentionally directing attacks against buildings, material, medical units and transport, and personnel using the distinctive emblems of the Geneva Conventions in conformity with international law;*

(xxv) *Intentionally using starvation of civilians as a method of warfare by depriving them of objects indispensable to their survival, including wilfully impeding relief supplies as provided for under the Geneva Conventions;...*

19. Article 30(1) of the Rome Statute addresses the need for intent and knowledge, in order to establish personal criminal liability: “*Unless otherwise provided, a person shall be criminally responsible and liable for punishment for a crime within the jurisdiction of the Court only if the material elements are committed with intent and knowledge.*” Thus, war crimes require proof of *mens rea* – i.e. intent or recklessness on the part of individual commanders or soldiers or “wilful blindness” on the part of a superior or commander.

20. The concept of war crimes, including grave breaches, is not coextensive with the obligations of States under IHL. There is no war crime involving, for example, a failure to take “all feasible precautions” in attack to avoid death or injury to civilians, i.e. the principle of precaution. The same applies to the duty on States not to conduct an indiscriminate attack. As the Appellant notes at §60 of their Skeleton, the principles of distinction and precaution do not require proof of intent or recklessness.³¹ This is because it is an issue of State liability.

21. The position under international law with respect to the interpretation of the threshold of “*clear risk*” of a “*serious violation of international humanitarian law*” therefore

³¹ See Articles 57 and 58 of Additional Protocol I.

requires consideration to be given to the following types of evidence, which *prima facie* demonstrate such violations:

- (a) KSA treating, for example, the entire region of Sa'ada as a military target on a systematic basis.³²
 - (b) Failing to take any, or any adequate, precautions to avoid hitting medical and humanitarian facilities, on a systematic basis.
22. Looking at the evidence through that, correct, international law prism, rather than any narrower consideration of war crimes, makes a real difference to the analysis.
23. Focusing, for example, on the Abs Hospital attack on 15 August 2016; that may not amount to a war crime, given that the intention may have been to hit a vehicle within the compound of a hospital. However, that is not the end of the matter if the relevant question is whether there is evidence of a clear risk of serious violations of IHL.
24. It is plain that KSA has violated IHL principles relating to the special protections afforded to hospitals. Moreover, and in any event, there is a clear case, at least on the OPEN evidence, justifying the conclusion that KSA has failed to take adequate steps to prevent such attacks on medical facilities occurring, including without issuing any warnings that could have minimised loss of life. The UN Expert Panel reached the same view in its 2017 Report (see [SB3/45/C386-387], which took into account the findings of the Joint Incidents Assessment Team). The evidence demonstrates a lack of any adequate or robust process for so-called 'dynamic targeting' or 'dynamic strikes', especially in circumstances where GPS coordinates of facilities were available to the State. Evidence of repeat incidents involving medical facilities raises a compelling case of a pattern of serious violations of IHL, and the clear risk of further such violations.
25. Similarly, an announcement that an entire area is deemed a legitimate military target does not comply with the principle of precaution or the prohibition on indiscriminate attacks. Even if individual incidents may not amount to *war crimes* leading to

³² This was held to be a grave violation of the principles of distinction, proportionality and precaution by the UN Expert Panel concluded in 2016, [CB3/31/C211], §128.

individual criminal responsibility, the approach of the State to their planning and / or processes for carrying out attacks must be considered by reference to the relevant principles of State liability, and a proper understanding of the position under international law with respect to the interpretation of the meaning of *clear risk*” of a *“serious violation of international humanitarian law”*.

26. If a decision-maker were to proceed on the basis that evidence of intent is necessary before a clear risk of such a violation can be established, the kind of repeated attacks recorded in the evidence summarised above may wrongly be considered insufficient to demonstrate a relevant clear risk of a serious violation pursuant to Criterion 2(c). If, on the other hand, the principle of precaution and the requirement that a State must take “all feasible precautions” to avoid death or injury to civilians is applied, such evidence does (as many reputable bodies including UN expert panels have found) demonstrate the existence of past serious violations of IHL, and the clear risk of future such violations.
27. It is impossible to interpret and apply the threshold test in Criterion 2(c) correctly without having careful regard to those distinctions. In asking itself whether there is a clear risk that *x* might occur, a decision-maker, and ultimately the Court, has to interpret the concept of *x* correctly. That same concept must be kept in mind when determining whether available evidence from reputable sources points to a pattern of past conduct amounting to *x*.
28. In the present case, as set out above, the reliable and consistent evidence from third party sources, and indeed the Government’s own reporting, pointed compellingly to the conclusion that there has been a pattern of serious violations of IHL in Yemen.
29. Oxfam is seriously concerned that the Respondent’s submissions and evidence suggest that, in addressing the threshold question of whether there is a *“clear risk”* of a *“serious violation of international humanitarian law”* under Criterion 2(c), the focus has been on evidence of war crimes. If so, it gives rise to a concern that the Government is systematically failing to identify situations, even beyond those in Yemen, which in fact demonstrate a clear risk that UK-supplied weapons may be used to commit serious violations of IHL. It is vital that the position under international law

with respect to the interpretation of the threshold of “*clear risk*” of a “*serious violation of international humanitarian law*” should be understood and applied correctly.

CONCLUSION

30. Oxfam supports the appeal and invites the Court to find that: (i) the Divisional Court’s analysis of the evidence from third parties, and the weight it gave to that evidence, was wrong; and (ii) the question of whether the evidence demonstrates a “*clear risk*” of a “*serious violation of international humanitarian law*” is to be interpreted and applied in accordance with the submissions above.

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26 March 2019