

FortyTwo Talks: AI in the Employment Tribunal

Michael Salter & Robert Winspear

Michael Salter: Hello and welcome to *FortyTwo Talks*, the podcast which takes a deep dive into the legal world, led by the experienced members of 42BR Barristers.

I'm Michael Salter, a member of the Employment team at 42BR, and I'm delighted to be joined by Rob Winspear, and at the risk of sounding a bit like *Sesame Street*, today's podcast is brought to you by the letters A and I and the number 42.

Today we're going to be doing something a little bit different from our normal podcast, we're not going to be focusing in on a single case or a single piece of legislation. We're going to talk about something that's quietly seeping into every corner of what we do, and that's artificial intelligence.

Robert Winspear: Yes, thanks Michael, and it really is starting to crop up everywhere, in just these past few weeks in the news the government's announced that AI is going to be deployed in the Crown Courts.

The Bar Standards Board has released new guidance on the use of AI by barristers, and we've also heard Lord Briggs of the Supreme Court give a lecture recently that he titled '*AI and Civil Justice: Preparing for the Tsunami*'.

Michael Salter: That's an addition, isn't it Rob, to all the cases we see reported on social media and in the lawyers' press, which are quite frankly terrifying tales for us.

Robert Winspear: So, what we're interested in today is the practical question for the Employment Tribunal - if you're a worker or an employer or a lawyer, where is AI actually showing up in employment disputes right now?

Because the answer turns out to be pretty much everywhere.

So, let's take it in chunks, Michael, where do you want to start?

Michael Salter: I think we should start and outline what our positions are with AI, I'm cautiously optimistic about it and I think its potential impact on working practises are immense, but like Yoda said about the dark side of the force in the *Empire Strikes Back*, it's not more powerful but it is quicker, easier and quite frankly more seductive.

Robert Winspear: In what way?

Michael Salter: It's seductive in that it makes you think you've cracked a problem that's befuddled humanity since the beginning of time. Every time you put something into an LLM it says "yes, you've hit the nail on the head, you've nailed this point, what a brilliant answer" and from a solicitors point of view, Boyes Turner produced a podcast quite recently on AI, and they said that they're finding it harder to settle cases with litigants in person, where that litigant in person's used AI, because AI has massaged the litigant into believing they've got a really, really, super strong, unanswerable case.

Robert Winspear: In a matter of seconds, and as far as quicker is concerned, on its face AI can save huge amounts of time, although from the recent decision in *Cork v Smith* that came out recently, we saw that the AI system was interrogated by a junior lawyer for over fifty pages of conversation between the lawyer and the AI, before the AI ultimately came to the wrong answer on a statutory provision, and so that makes you think surely it must have been quicker to just go to the primary source.

Michael Salter: Well, exactly, or spend the time giving AI the context, uploading the statutory source, uploading any case law or anything like that and tell your computer to base your research on that, or ultimately why not just go to another app or heaven forbid a book if you can remember what those are, and get all the information into the system first, and then help it give you the answer.

Robert Winspear: So, do you think there's a common theme then on the risks that AI poses?

Michael Salter: For me I think, and I'm going to show my utterly juvenile sense of humour here and in my defence, I've got two young kids, an 8-year-old and a 6-year-old, so my humour levels are currently well and truly nested at that level, I call it the PP line, are you using AI as a productivity tool, the first P, or are you using it as a proxy.

The first of those I think is okay, the second is where the real danger lies. People with a far more grown up take on this world and sense of humour say you can outsource the work to the AI safely, but you can't outsource the thinking.

So again, it's the outsourcing the actual doing of the work is okay, but outsourcing the underlying construction of that work isn't right.

Robert Winspear: Yes, I totally agree, I think frankly that's where I'm struggling with the best way to use AI in my own practice at the moment. I might ask it to make a chronology for me from a bundle of documents but then I'm also so afraid that it might've got something wrong that I spend the same amount of time checking the AI work product, as it would've just taken me to do the chronology myself.

So, what I will say is that it's sometimes brilliant for finding a case for you that you didn't know about previously, but the main lesson from the reported hallucination cases is just make sure you check the citation and actually read the case, and it's something we're going to talk about later on.

Michael Salter: Yes, absolutely right and I don't think its any different than having a pupil or a trainee, that you should check their work, and as I say easier with an AI because it's a computer and therefore you think it can't be wrong, but anyway I think we're talking on a general level.

So, let's look at some of the practical and real-life examples as how it might affect employees going through a recruitment process into, I don't know, performance management and then potentially dismissal.

Robert Winspear: Sure.

So, I mean, let's think about hiring and the issue of CV screening in the hiring process. It's been widely reported that companies are using AI to help sift through all of the job applications that they receive.

I can imagine that if the training data that the AI relies upon reflects historical hiring biases, and it almost always does and will, because that's the data that exists, then the tool is just going to replicate that historical data.

So older applicants or women returning from maternity leave for example, or names that don't sound British, all of those have the potential to be quietly filtered out before a human ever looks at the application.

Michael Salter: I think that's the real risk, isn't it? That no one knows what the choices are that are being made by the AI or why the choices are being made by the AI.

If a human recruiter makes a decision based on your name or your age or whatever there's likely to be something in the papers, something there that discloses that bias, but if a piece of software does it, the rejection email looks the same for any number of people who've been rejected in that tranche of applications.

Robert Winspear: Yes, and I think there's a quieter point as well, which may lead to discrimination in the hiring process and it's the idea that like universities trying to make sure that their students are producing original work, which is obviously a different problem in a different context, some employers are now using AI detection tools, those same detection tools to spot job applications written with the help of AI and the thinking of the employers is 'Well, you know, we want to see your real writing' and that sounds fine except of course, the applicants that lean hardest on AI are the ones with dyslexia, or are the ones with English as a second language or are the ones with cognitive difference.

Michael Salter: So, you end up penalising people using AI as an assistive technology.

Robert Winspear: Which I can see as potentially indirect disability discrimination. I mean nobody's litigated that yet because this is so new, but I'm sure somebody will.

Michael Salter: Yes and by way on the side, I saw a useful, or an AI tool, I'll let you decide whether it's useful or not, that will insert typos and spelling mistakes into emails that you've used AI to draft in order to make people think it's not AI drafted, but anyone who has had the misfortune of receiving an email from me knows I'm well ahead of the curve on typos in my emails.

So, lets then move down the life cycle, imagine you've been recruited, you've got your job and now your employers using AI to rate your performance, to say how good you are at your job.

Robert Winspear: Yes, and I think this is where it gets really interesting from an unfair dismissal point of view, because obviously the law on unfair dismissal hasn't changed and it's been as it is for a number of years. If an employee is sacked for poor performance the employer still has to have a reasonable belief in that lack of capability

and the employer has to follow a reasonable process, completely uncontroversial, but it begs the question, in the advent of AI, whether the reliance on an AI process is going to be seen as reasonable.

Michael Salter: Yes, I can see the situation, you're a call centre worker, your calls are transcribed and analysed in real time by the AI, the system will then give you a score, a compliance score, productivity score or whatever, and your manager will just look at that dashboard and say "Oh no, you're bottom for the third month running, therefore performance and you're out".

Robert Winspear: And of course, in the tribunal the question isn't, 'well is the technology good?'

The question is, 'was the dismissing officer entitled to rely on those scores?'

In other words, did they understand what the scores actually measured? Did they look behind them?

Michael Salter: Because if they didn't, following it through I think the dashboard then is being treated as gospel and arguably the dismissing managers belief in the lack of capability wasn't held by them, potentially couldn't be reasonable and certainly any investigation that simply just accepted that account as being accurate, I think could be more open to some criticism.

Robert Winspear: Yes, and although its not strictly part of the Employment Tribunal's jurisdiction, there's also a data protection layer underneath.

Of course, under the GDPR there's a right not to be subject to a wholly automated decision that has a significant effect on you, and you losing a job is obviously significant.

So, if the employer can't show a meaningful human review, as opposed to just rubber-stamping the output of an actual human judgement, then they may be in breach of that as well.

So, alongside the growing number of data subject requests that employees make in advice of bringing tribunal claims, that Michael you must see all the time, I do, we might start seeing threats of other claims under the GDPR in light of the use of AI.

Michael Salter: Yes, I can certainly imagine an unfair dismissal claim where an employee asserts their manager didn't understand the AI system that was ultimately used to justify their dismissal.

Robert Winspear: Yes, which I think is going to make for some interesting cross-examination in the future if the managers not able to explain what the AI was telling them.

Michael Salter: Well certainly, if the test is what was in their mind and they can't explain satisfactorily to the tribunal the number generated by the system then I can certainly see there's potential for problems there, I also do wonder what happens if the evidence shows that the AI was simply wrong?

Not just incorrectly recording something but it goes back to your bias point at the outset.

Sorry I kind of digressed there.

Robert Winspear: Yes, I mean totally, totally. I think the overall broader point here is that AI hasn't created any new heads of claim. It hasn't given us anything we didn't have before in terms of the legal causes of action, but what it has introduced are various different new angles for bringing claims in the Employment Tribunal.

Michael Salter: Yes, and I think almost connected with that and something that's got slightly less airtime in recent months or years, is workplace surveillance.

Robert Winspear: Totally, which has exploded since the pandemic. The TUC's polling has it at 60% of workers that were polled now saying that they'd been monitored by their employer, and of course with the recent proliferation of AI and how quickly its progressing, the technology's getting smarter.

It used to be 'are you logged in?' now its 'how fast are you typing' , 'are you smiling on camera?', 'what's the tone of your emails?'

Michael Salter: And we've got a legal framework that's created well before AI and monitoring and such like, and you do wonder if its up to the task of these new challenges.

You've got Article 8 of the Human Rights Act, right to private life, you've got Data Protection Law which you touched on earlier, you've got the implied duty of trust and confidence in the contract, and you've got the Information Commissioner who's been quite active in this area.

Robert Winspear: Yes, an interesting example is Serco Leisure, they were using facial recognition and fingerprint scanning to track their staff attendance, clock in with your face basically, but the Information Commissioner said no.

They said it was disproportionate to use that technology, they banned Serco Leisure from using facial recognition on the basis that Serco could not justify why it was necessary and proportionate to use that technology as opposed to something less intrusive like ID cards, or fobs, or something like that.

Michael Salter: I guess Serco probably thought they were being efficient. They probably thought that facial recognition saves time, it stops your mates clocking in for you, so there was obviously a benefit to the business, and they probably weren't trying to be sinister, but the constructive dismissal angle on this is going to come soon because someone's going to say, 'My employer rolled out this suite of facial

recognition programmes, or whatever and it's so intrusive, how can I trust them, I'm gone and I'm going to issue a claim'.

Robert Winspear: Yes, and I can see a disability discrimination claim that might go with it because we know from the research that intensive monitoring drives anxiety, burnout and it could well exacerbate those symptoms in someone already suffering from an underlying mental impairment, and then you've got a disability discrimination claim.

Michael Salter: And if you're being monitored by how quickly you type, you are going to be stressing and having increased anxiety levels when you think you aren't hitting that threshold.

Robert Winspear: Yes, absolutely.

Alright, so we've touched on surveillance there, but let's talk about the one that gets all the attention in the press and in headlines, which is, is AI coming for jobs?

Michael Salter: Oh wow, is it?

Robert Winspear: Well, yes and no. The recent research is actually more interesting than the headlines, there have been obviously several headlines of big companies justifying redundancies or hiring reductions on the basis of actual or expected AI rollouts, but there are also just as many examples of companies saying that their hiring has in fact remained consistent and instead AI has meant that they're redesigning existing roles for their staff, they're reskilling their staff and they're building different teams within the same business.

Michael Salter: Which from a legal point of view is much more complicated, isn't it?

Robert Winspear: Well, go on.

Michael Salter: Well, because redundancy is in some ways the clearest thing an employer can do. If the jobs gone, your role has gone,

we're going to follow a fair process, we're going to make any redundancy payments that we're required to do and then there you are thanks very much, thank you for your time and years of service, there's the door.

It's painful and no one likes it but its quite nice, its quite tidy rather.

Role redesign isn't, role redesign is obviously the variation of the underlying contract of employment, it's changing what someone is paid to do without changing the head count, and if you do that without consent or without consultation, without proper process, you get constructive dismissal claims, you get breach of contract claims, though arguably potentially collective consultation obligations if your doing it at scale and the restrictions on fire and rehire make this a much more difficult process.

Robert Winspear: Yes, and the bit that's starting to surface in the research is that a lot of these AI projects fail. Something like 78% of organisations have had an AI project either stall or fall over completely.

Michael Salter: And that's a fascinating consequence isn't it, for litigation, because if your employer says 'we're making you redundant because AI is coming and its going to do your job' and then six months later the AI project is shelved, either quietly or not, it certainly opens the door to challenge the adequacy of the redundancy situation.

Robert Winspear: Yes, exactly, I mean the question is, was the diminution in the requirement for employees real? Or was it just speculative?

Michael Salter: And, in unfair dismissal we know that the burdens on the employer to show the reason. If the reason turns out to be a guess about future technology that didn't pan out, I can think that's a difficult situation to defend, obviously the first limb for the test of redundancy is whether or not that work ceased or diminished but there is the

second limb as well, was it expected to cease or diminish? And tribunals aren't going to second guess businesses, but I think the business is going to have to put something together to show the expectation for cessation.

Robert Winspear: I'm sure we're going to see more of these cases in the next couple of years, you know, premature AI redundancies with employees coming back and saying, 'well you got rid of me too soon'.

Michael Salter: And then there's obviously the collective obligations for redundancy as well, if you've got 20 or more redundancies, you've got those obligations.

We've seen employers underestimate the number of roles affected, miss the threshold and get caught out. AI restructures are particularly prone to that, because the impact of AI replacing 1 role ripples out and you think you're cutting 12 roles, but actually the redesign affect so, so many more than that.

So we should talk a little bit, I think as practitioners, about what we're dealing with on a daily basis, or certainly a weekly basis, which is AI showing up in the actual proceedings that we deal with.

Robert Winspear: Yes, and I think we have to start with the hallucinated cases, don't we? Because it genuinely is one of the strangest developments of my career that I've seen in my practice.

Michael Salter: Yes, it really is.

So, someone who isn't familiar, ChatGPT and tools like it will with great confidence, produce case law that doesn't exist. It will either invent a case name or, slightly more worryingly, refer to a properly cited and referenced case, but for totally the wrong proposition.

Robert Winspear: Yes, and you can see how this happens, can't you? Because fundamentally, AI is a pattern matching machine, it recognises patterns, so it knows what a case citation looks like, and it

knows that the way cases are published online is that they'll give a summary and then it thinks 'okay, I can do that too' but the thing is, the AI doesn't necessarily know which cases are real and which cases are fake.

Michael Salter: And I don't have an exact number, but we're seeing more and more of these cases shared on social media and lawyers' press, where sometimes a lawyer, or two lawyers, both lawyers on different sides, are dealing with case law that doesn't exist. They're presenting documents to the tribunal or court with fake cases, and this is happening more and more in the employment tribunal in particular.

Robert Winspear: Why so many in the employment tribunal?

Michael Salter: I think it's because the employment tribunal has more litigants in person than most other jurisdictions.

People who can't afford a lawyer, who are trying to do this themselves and trying to represent themselves, and are reaching for a free tool that can confidently tell them they've got a case, and not just they've got a case, but here are a number of cases that support your situation.

And for totally understandable reasons, a litigant in person doesn't have any way of knowing whether or not these authorities are fictional or not.

Robert Winspear: Yes, I mean personally, I've seen a massive uptick in these types of cases whenever I've been up against a litigant in person.

But what's the judicial reaction been, Michael?

Michael Salter: Well, the senior judiciary have been broadly supportive of litigants in person using AI and Lord Briggs made exactly that point in his recent lecture and echoed the views of the Master of

the Rolls in recognising that some help is better than none, as long as the risks of reliance or risks of using those tools are understood.

Robert Winspear: Yes, I mean its undeniable, isn't it, that it improves access to justice, it narrows the gap between a represented and unrepresented party, but the problem is that the litigant in person simply can't distinguish, well sometimes they can, sometimes they can't, but typically they have difficulty because they haven't had the legal training of distinguishing between a fake case and a real one.

Michael Salter: Yes, and the more embarrassing situation, I guess, is when a lawyer makes that error, and I think that's when it becomes much harder to justify or explain the use of it, if you're regulated and you're an officer of the court, you can't just hand something up that's been generated by AI without checking it, so the professional consequences are real.

That recent case you referred to earlier, the *Cork* case where Pinsent Masons relied on AI, well I understand and I have absolutely no insight into this, but I understand it was for a routine paperwork based application.

Robert Winspear: Yes and for the bar specifically now, the goalposts have just been formalised, haven't they, with the BSB coming out with new guidance on AI in May.

It's worth every barrister listening, actually sitting down with it and reading through that, isn't it?

Michael Salter: Yes, three things stood out to me from it.

First is that it's a risk-based framework and text generation, drafting and anything destined for the court, all that sits in the high-risk category with agentic AI to be treated with what the guidance calls absolute caution.

Secondly, using an AI tool is treated as outsourcing under the handbook, so you remain personally responsible for every word, which again is that point I touched on at the outlet, it's the same as having a pupil or a trainee, that you should check what they put out, and the same with AI, you cannot blame the tool.

Thirdly is transparency, if AI materially affects the nature or scope of the service, you should tell the client and obviously you must answer honestly any question that you're asked by a court tribunal or regulator.

Robert Winspear: What does it say about the free public chatbots, so ChatGPT and so on?

Michael Salter: Well, the guidance there is pretty blunt that usually it's too high risk for legal work or anything client specific at all to be placed in them, because where your prompt and your clients information end up is going to be saved in a generally accessible repository of knowledge and now the Upper Tribunal in the Property Chamber has said that uploading confidential documents to an open AI tool puts that information into the public domain, which obviously breaches confidentiality, but has devastating impacts on privilege.

Robert Winspear: And just touching on another issue, that there's a massive volume problem being created by AI isn't there?

Because the same litigant in person who are inventing cases are also producing absolutely enormous witness statements, very long submissions, very long repetitive correspondence, because the AI doesn't know when to stop, does it?

Michael Salter: Well, it doesn't and we all know that the tribunals times is finite, there's already a report out this month showing backlog is at four years in some regions.

AI assisted litigants in person are undoubtedly going to add to the challenge of clearing that backlog.

Lord Briggs anticipates it will be lead to a tsunami of new claims, and I know as a chambers, we're seeing an increase in the number of interim relief applications that are coming through.

Interim relief has been obviously on the statute books for years, but very, very few people, even over the COVID period, there are a lot fewer interim relief applications that we're seeing at the moment.

Robert Winspear: Yes, that's really interesting, isn't it? It's really interesting to see how the AI is thinking, it must take things chronologically, mustn't it? And it must ask itself, first of all, is there scope for an interim relief application, which is something that practicing lawyers aren't always thinking about, so yes, I agree with that.

I mean its going to be very interesting to see how the tribunal deals with these challenges. I thought Lords Briggs' thoughts were particularly interesting because he was imagining a future where for small disputes, it's not impossible to think that everything is ultimately fed into an AI system, and the decision is then made by an AI rather than a human judge.

Lord Briggs didn't give an opinion about whether he thought that was a good or a bad idea, he framed it as a political question ultimately, you know, whether the public would ever feel that this is an acceptable compromise is a question that he can't answer, but if the alternative is waiting potentially many, many years for their dispute to be heard by a human judge, then it does make you think, doesn't it?

Michael Salter: It does, and I think framing it as a democratic question, I think is exactly right. It isn't for judges to decide whether or not they should be replaced. I suspect his guess is that the public might be content for a machine to decide, as you say, the low value

claim, buying a kettle off eBay or wherever, but not anything that puts their liberty, home, children or financial survival at stake, but we are at the beginning of the life cycle of this technology, and I suspect over time, as it becomes better or more clever, there might be a shift to expand the scope beyond the sale of the kettle.

Robert Winspear: Yes and I think the senior judiciary have learnt from their experiences with digitisation of the court process, they felt that they didn't react quickly enough, and then they paid for the consequences, but here they're trying to get ahead of the game.

We've also heard from Lord Reed, the President of the Supreme Court, saying last month that the courts may have to fight fire with fire, and in other words, building AI into the way that cases are managed, and it's precisely because AI is already driving a huge increase in the number of claims or diverting more of those claims into something like, like ADR, as we mentioned earlier, the Crown Court, the government has announced is already going to use some sort of AI technology to help, with case management.

Michael Salter: Yes, digital paralegals effectively summarising case files and doing first pass research and flagging which cases are ready for trial. Immigration judges already using restricted versions of Copilot to help prepare for hearings and draft their decisions, and again, I think it's that line between productivity and proxy.

Robert Winspear: Yes, so I mean so far the official line is that the AI has no role in actually deciding the case, that's the line the ministry says it's drawing, but, yes it remains to be seen how long that line will stay where it is.

Michael Salter: So we've already seen how fragile trust can be. We've seen judges recently cleared after investigation in relation to allegations regarding AI-invented quotes in high-profile judgments,

which takes you straight back to Lord Briggs' point, there has to be complete transparency about how far AI is assisting or in some places, and I think could be very, very careful where it's replacing the work of human judges. At the moment, the public suspects the reality's drifted away from what they can legitimately expect, there's a real, real problem for the judiciary.

Robert Winspear: Yes, so we should name just a few of the things we didn't have time to do properly today because they are real and they're coming.

Michael Salter: Go on.

Robert Winspear: Well, whistleblowing is one. I can see that we're going to see employees blowing the whistle on their employer's AI, saying that the algorithm is biased, or the surveillance is unlawful, or the outputs are being misused, and the suffering of a detriment as a result of it.

I mean, that's a classic protected disclosure claim, isn't it?

Michael Salter: Yes absolutely, and also confidential information. If employees are posting client lists, board papers, or anything confidential on to ChatGPT, they may not realise that the data has gone somewhere, but we're going to see breach of confidence, contract, injunctions, those sorts of claims are going to be arising, I suspect, out of AI use.

Robert Winspear: Yes, worker status is another one. The AI doesn't have employment rights, obviously, but the platforms that use AI to dispatch gig workers, that's where the next wave of worker status litigation is because the more that the algorithm controls, the harder it is to say that someone is genuinely self-employed.

Michael Salter: We all love a good data subject access request. I can imagine employees are using them to process the requests when they come in, which they can do, but the responsibility for the accuracy and the completeness still sits with the employer. Again, I think it goes back to that whilst you can outsource the work, you can't outsource the thinking to the AI, and the AI can't spot legal nuances, and you can't blame the AI when it gets it wrong.

Robert Winspear: Yes, and the one I keep thinking about is equal pay. We've obviously got these huge group claims that are being brought against the supermarkets at the moment, and it's interesting because if you're using an AI tool to set pay bands, and that tool's been trained on historic salary data, which we know reflects gender and ethnicity gaps, then you may be entrenching exactly the inequality that you're supposed to be designing out, you know, this is already a developing area of law with these big cases that we're seeing.

Michael Salter: And you know the comparator analysis becomes easier with an AI on the claimant side, it can crunch the numbers and draw the comparisons that are necessary, so yes I think we might see equal pay claims growing in number rather than reducing.

Robert Winspear: So, to summarise it in one line- AI hasn't given us new law. It's given us new evidence, more data, more decisions, more documents, more inputs into the same legal tests that we've always run.

Michael Salter: Yes, and the tests don't care where the input came from, a human or machine. They care whether the outcome was fair, whether the process was reasonable, and whether the worker was treated reasonably and with dignity.

Robert Winspear: So is there a takeaway from this talk, Michael?

Michael Salter: I think if you're an employer, the message 'is don't treat AI as a procurement decision'.

It is ultimately a workforce decision, it's going to impact on the people you employ. As with all things, document why you're using it, document what it does, document your oversight of it, and how a human can intervene.

If you can answer those four points, you're probably well on the way to your decision process being defensible. I think if you can't document or evidence those four steps, then you've got a real problem.

Robert Winspear: So that's for the employers, but what if you're a worker?

Michael Salter: I think ask the question. Ask whether AI is involved in any decision that's impacted on you.

Ask for an explanation as to how it's being implemented, and I think you're entitled to an explanation.

Don't accept, 'well, the system says so,' and don't accept, 'computer says no', as an answer.

Robert Winspear: And then what about the lawyers?

Michael Salter: I think as a profession as a whole, both limbs of the profession have to accept that it's not somebody else's problem. It isn't a technology issue, it's an evidence issue, a process issue, and a fairness issue.

You might want to run 100 miles from ever using AI in your own practice or in your own way of working, but other people don't. Everything we do is impacted by, for barristers, read the BSB AI

guidance, the judicial guidance if you sit, or just the judicial guidance also to give you an understanding if you don't sit, as to AI use by the judiciary and otherwise.

I think the BSB particularly have spelt out what competence looks like, and as we all know, ignorance is not going to be a defence.

Robert Winspear: Yes, I completely agree, Michael, and on those reflections, I would like to say thank you for listening to this podcast and tuning into *FortyTwo Talks*, we hope you enjoyed it.

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