CIRCUIT PAPER ON CPS ISSUES FOR THE NEW DPP

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(I) FEES

It is now 6 years since scheme c was introduced. It was recognised at the time by the Bar as a direct and unavoidable consequence of swingeing budget cuts imposed by the Treasury on the CPS, in the wake of the financial crisis. The greatest cuts were to the higher end work - agreed to by the profession in order to protect the young Bar. But there were cuts everywhere and they have been exacerbated by inflation. The time has come to start reversing those cuts, not all at once but over time, and to protect the rates by index-linking. If a profession is gradually but inexorably impoverished, it will gradually but inexorably fail to attract new recruits and die. There is fundamentally no future for the Prosecution Bar without more money.

The Treasury needs to understand that it would only take 2 or 3 years of Grade 1 prosecutors turning away from CPS work for the whole system to collapse - swathes of cases not being covered. And what would the solution be? How would the government fill that gap quickly? Equally, unless prosecuting for the CPS allows for real career progression in terms of income, senior prosecutors are likely to turn away from CPS work as they find that their earnings are effectively capped at not much more than their juniors. Scheme c was a response to a financial crisis and it now runs the risk of being the cause of a crisis in the sustainability of the Prosecution Bar.

That said, the purpose of this paper is to identify the more egregious flaws and iniquities in the current scheme and suggest solutions that, if not cost-neutral, would not involve significant immediate increases.

1. Categories

The categorisation of offences is too rigid and, in some cases, non-sensical. An example of the latter is causing death by driving. Anyone who has prosecuted such cases will know how stressful and emotionally draining they are, from the moment you meet the bereaved family to the moment you read the victim impact statement. And yet they are paid the same as a Class A PWITS or money laundering. We submit that these cases should be placed in Cat A. There are not many of them and therefore the overall impact on fees would be minimal. There were 569 cases of causing death or serious injury recorded by police in 2016/17. If one assumes that all of those cases resulted in prosecution then the difference across the whole of England and Wales would be as follows (based on a 5-day trial): Cat B - 569 brief fees x £1,000 = £569,000. Plus 3 x £480 (refreshers) = £1440 x 569 = £819, 360. Total on Cat B = £1,388,360 [£569,000 + £819,360]. Same calculations on Cat A: brief fee £1760 x 569 = £1,001,440. Plus refreshers £620 x 3 = £1,860 x 569= £1,058,340. Total on Cat A = £2,059,780 [£1,001,440 + £1,058,340]. Thus the total increase in fees nationally would be just £671,420.

The second reform we suggest is to allow for flexibility in categorisation in order to (a) compensate Counsel for particularly serious cases and (b) ensure that the CPS can instruct higher grades for serious cases in lower categories. A Section 18 Cat B case could be a straightforward bar brawl or (and this is a real example) a gang shooting into a crowd outside a nightclub involving witness anonymity applications where

the life of the witness is at risk. They pay the same. We submit that in such clear cases of complexity there should be an uplift.

The mechanism could be that the CPS apply it because the complexity is recognised at the outset or the advocate could apply for it with some mechanism for appeal. Again, the sums involved need not be great. Instead of a week-long case paying £2,440 it could be increased by a one-off uplift of (say) £500 and perhaps in exceptional cases an enhanced uplift of £1,000.

The effect will be to remunerate the most difficult cases properly and attract more Grade 4s to prosecute them. In the same vein, we suggest that an uplift be allowed in another way. Some lower category cases (for example harassment) may be extremely serious and complex. The CPS should have the flexibility to require a Grade 4 to prosecute such cases (another example is a public figure accused of perverting the course of justice) in which case there should be an increased fee paid. We would suggest a flat fee of £3,500 a week for such cases. Again, the number of cases would be relatively small and, of course, the extent to which this nomination procedure would be used would be entirely discretionary. If the CPS is to live up to its commitment to take DV seriously then what better demonstration of that than assigning their most senior Counsel to prosecute them.

2. <u>Enhanced Brief Fees</u>

The thresholds for "enhanced" brief fees are not fit for the digital age. If the CPS continue to insist that telephone data and phone downloads do not count towards the page count, the 5,000 threshold in Cat A and the 10,000 thresholds in Cats G and K are never going to be passed for a Leading Junior or a QC. A "junior alone" is never going to be prosecuting a Cat A case (murder, for example) that has more than 1,000 pages if digital material is excluded.

The enhanced brief fees are not spectacular remuneration in themselves and therefore we propose that the arbitrary thresholds are dispensed with and that in any "two Counsel" case, the enhanced fee is paid. In complex single Counsel cases then the enhanced fee should be paid - cases could be categorised as such by the CPS and there should be a facility for the briefed advocate to apply for such an uplift upon receipt of the brief and also if the case becomes more complex later on.

3. <u>Use of Queen's Counsel</u>

There has been a marked decline in the number of cases in which QCs are instructed to prosecute - at least outside homicide cases at the CCC. In our experience the CPS are using Grade 4s whenever they can. We acknowledge that some experienced Grade 4s may be equally talented. However, the failure to instruct QCs in appropriate cases is likely to kill the rank off - or at least discourage Grade 4s from applying for silk. The perception among CPS lawyers is that QCs are significantly more expensive to instruct. That perception is wrong. A Leading Junior in a Cat B

case gets a brief fee of £3,990 and £710 per day - a total of £9,670. A QC gets £5,320 and £950 - a total of £12,920. The difference therefore in a 2-week trial is £3,250[1].

We do not expect the CPS to support a rank at public expense for the sake of it. However, the CPS **do** use silks and therefore recognise the importance of that "quality mark". That quality of advocate will not be available in about 10 years' time because those who prosecute will not take the risk of giving up a heavyweight Leading Junior practice for the uncertainties of the odd two-week murder twice a year.

The wording of the "decision tree" is, we submit, also unnecessarily restrictive. It currently reads (in a two Counsel case) "Irrespective of the offence type, does the case feature substantial complicating factors of gravity, sensitivity, complexity or responsibility which could not be adequately prepared and presented other than by Queen's Counsel". That test requires a CPS lawyer to ask him/herself a strange question: "in advance of the trial am I satisfied that only a QC could 'adequately' prepare and present my case?". Leaving aside the rather low bar of 'adequately' it is a question that can always be answered in the negative. Of course, in theory, there will always be an experienced Grade 4 in his/her last few months before taking silk who could 'adequately' prepare and present the case.

We suggest that the wording be changed to something which does not have such an in-built negative bias. For example: "Irrespective of the offence type is the case of such importance, complexity, size and/or gravity that it justifies the instruction of a Queen's Counsel".

4. <u>Reductions in brief fees on re-trials</u>

The reduction in a "brief fee" on a re-trial is unfair and encourages returns. The fact is that there is not, in most cases, a brief fee - it is just the fee for days 1 and 2. A 40% reduction in the brief fee applies if the re-trial starts within 1 month of the decision to re-try. That means on a 5-day Section 18 prosecution, Counsel is working for £300 a day for days 1 and 2 of the re-trial. If the re-trial starts after a month then the reduction is 25% and therefore the first two days are remunerated at £375. We submit that this is unacceptable. It is a hang-over from the days when large brief fees were paid to cover preparation and it was recognised that the preparation on a re-trial would be less. These reductions should go. We recognise that where an enhanced brief fee is paid to leader and junior and a jury is discharged and the trial restarts with a new jury straight away there is a risk of large sums being paid unjustly - therefore we would be prepared to discuss a formula to avoid that in exchange for the abolition of these reductions in standard cases.

Attached (as Appendix 1) is an analysis of fees data taken from the Annex 3 Effective Trials data put into spreadsheet format. Highlighted in RED are those Main Hearing Fee daily equivalent fees where they drop below the Daily Fee for that category, and in YELLOW the worst offenders.

[1] QC: £5,320 + (£950 x 8) = £12,920. Leading junior: £3,990 + (£710 x 8) = £9,670.

5. Multi-handed defendant uplifts

The uplift for additional defendants is miserly (5% of the brief fee). A junior alone prosecuting a 5-handed violent disorder that lasts two weeks only gets an extra £200 for the increased complexity. These cases are (unsurprisingly) avoided like the plague. We suggest that the first additional defendant should attract an extra flat fee of £500 a week. The second to 5th defendants another £500.

6. Unused material

It is quite simply indefensible that the reading of unused material is totally unremunerated under scheme c. In RASSO cases it can involve hundreds or even thousands of pages of social services/medical notes. In phone-heavy cases, many pages of downloads may have to be reviewed. We submit that a modest hourly rate of £50 per hour could not, and should not, be objected to.

7. Sentencing and billing

Counsel are no longer earning enough that large delays in payment can be absorbed. The CPS deserves praise for the increased speed of payment these days (although page count issues and higher authorisations in the bigger cases can still cause painful delay). However, the spectre of constantly adjourned sentences is enough to send a chill down Counsel's spine. Those cases that involve assessments for hospital orders are particularly prone to constant delays. It is not uncommon for payment to be delayed by two or three months. We propose that Counsel should be able to bill a case immediately upon conclusion of the trial and that said bill should include one sentence fee. In the event that more hearings are necessary they can be billed separately - in the same way that confiscation hearings are.

8. Advices and Conferences

Written advices are time consuming. To read a standard case and produce a written advice takes about three hours. Given that there is in effect no such thing as a brief fee the provision of a written advice is unremunerated - as is the drafting of case summaries, opening notes, notes for sentence and skeleton arguments. If a conference is arranged there should be no need for a further formal written advice. Obviously, Counsel will be expected to advise orally and by email on all aspects of the case throughout.

Conferences are paid at the derisory rate of £33.50 per hour. Given that they are often arranged in the middle of the day it is quite often necessary to write off a whole week because taking a trial is impossible. They take perhaps 2 hours to prepare, the conference itself will last at least an hour and will probably involve at least one hour of travel to the CPS offices. The effect is therefore a whole day for £134.

We submit that conferences should attract the normal £80 per hour rate for preparation and length of conference. We would not insist on any fee for travel unless the conference takes place at CPS offices more than one hour travel time from the Chambers of the instructed advocate, in which case half the hourly rate should be paid for any additional hour.

9. Appearances in the Court of Appeal

The fees for appearances in the Court of Appeal have become a scandal. £310 per day and £155 if the case concludes before lunch. True it is that hours are allocated for preparation at £80 per hour but those hours are inevitably used drafting RNs and skeletons - usually in the evenings or at weekends. We submit that no appearance in the Court of Appeal should be less than a refresher in the Crown Court and that the appropriate level should be £700 a day for sentence and £850 for conviction with (as is now the case with refreshers) no such thing as "half day" fees.

10. "Day 1" of Trial

If a jury panel is selected on day 1 but sworn on day 2 or if the jury selection and swearing does not start until later in the week for any reason then, as long as an effective trial follows, day 1 should attract the main hearing fee. Paying a legal argument/trial stood out fee is petty.

11. London and SE weighting

Practising in London brings additional living costs and higher professional costs such as Chambers rent and travel. We submit that the fees paid should reflect that difference - a difference that the CPS itself rightly reflects in the salaries it pays its staff.

(II) GRADING

Whether the self-assessment competency-based approach is a good way of identifying the right grade of Counsel is debatable but we recognise that it is here to stay.

That the process is time-consuming for applicants as well as the CPS is something we probably all agree on. Those having to provide multiple references would also no doubt agree. The "passporting" scheme between panels has been a welcome (and efficient) reform.

However, we think there are improvements that could be made that would be beneficial to the Bar and the CPS.

We wonder whether it is really necessary to complete so many applications? For example, an advocate with a Grade 4 general grading needs to complete up to 5 separate, full, competency-based applications in addition to the general application form to prosecute the full range of work. These then have to be separately submitted with separate copies of references (which is also arduous for referees and difficult to arrange with those who are already generously giving us their time to write them).

Is there not an argument for saying that a Grade 4 should be eligible for work on any panel in which they have expressed an interest? Perhaps even a Grade 3 since the level of work they will have access to will be limited by their grade?

The rule that an unsuccessful applicant for an upgrade may not apply again within the lifespan of the panel is (we believe) unnecessarily restrictive and is causing problems for prosecution Chambers. The problem is most acute at the Grade 1-2 level. In any Chambers with significant prosecution work, it is imperative that we get Grade 1s up to Grade 2 as soon as possible because a Grade 1 is unable to cover any Chambers work of any seriousness - hence we have problems covering PTPHs and mentions in serious cases when the instructed advocate is unavailable. The effect of the current system is that Grade 1s cannot make a living and Chambers are forced to send them on secondments, from which some never return, and during which they are unavailable to cover Chambers' CPS work.

A Grade 1 who makes an unsuccessful Grade 2 application is very likely to have only missed it by a slender margin - because the difference in the criteria is not so great. Any deficiency in experience is likely to be remedied within months. It seems a great waste to say "well you can't apply again for several years". Surely they should be allowed to have another go at the next annual upgrade window?

The other side of the same coin is the reluctance of some advocates to risk an upgrade application one or even two years into the panel because of the danger that rejection precludes another go. The jump from Grades 2-3 and 3-4 is much greater and the strict "one chance" rule has the effect of making otherwise able candidates

risk-averse. May they not at least be allowed one more go during the lifetime of the panel?

(III) INCREASING BURDENS ON PROSECUTION COUNSEL

To be blunt the CPS have, over the last decade, expected more and more of Counsel for less and less remuneration. Attendance notes, full written advices, case summaries, bad character and hearsay applications, skeleton arguments, opening notes, notes for sentence, advices on appeal and acquittals. Only the last two are separately remunerated and at a derisory rate. We want to provide you with a proper service and nobody would argue that most of the above are necessary - but the simple fact is that the CPS are asking for a first-class service at third-class rates of pay.

The advent of digital cases is a good thing - however the cost of printing cases for trial has been passed onto Chambers and there is now a tendency to copy Counsel into a thousand emails which realistically cannot all be read and often contain no instructions.

And the burden seems to be increasing, with diktats that are frequently unrealistic - often because they are not the product of consultation with us - and unremunerated.

A recent example is Disclosure Management Documents ("DMD"s). We acknowledge the necessity of these documents and broadly welcome their introduction. However, we are concerned that the burden of drafting them should not fall upon Counsel (a) unless separately remunerated and (b) with adequate time to do so. Attached at Appendix 3 is a letter received by all Heads of Chambers from the Deputy Chief Crown Prosecutor of CPS South East. Once again it dictates rather than consults. It refers to "standard paragraphs" being inserted into the Instructions to Counsel Template Form. They do not appear on the CPS website. "Counsel will be instructed to address the quality of the DMD and confirm that they consider all reasonable lines of enquiry have been considered" it says. Well, when is that to be done? At PTPH? After the evidence and a DCS has been served? After a conference? The penultimate paragraph of the letter implies that it is to be done at PTPH - how is that realistic given the fact that PTPH briefs are rarely briefed out in time for a conference to be held? This has the appearance of trying to shift the responsibility to Counsel to "sign off" the DMD.

Everyone appreciates the need for DMDs but this is another example of a (no doubt inadvertently) high-handed in tone, directory communication that has not been the result of any discussion with the Bar, CBA or Circuit. Why is it considered sensible for these sorts of policy revisions to be rolled out without the input of the Bar?

(IV) TONE OF COMMUNICATIONS FROM CPS

Set out in Appendix 2 is a recent communication from CPS South East. It is high-handed in tone and has (as far as we know) not been discussed with the Circuit, CBA or Bar Council. It seeks to (inter alia) dictate the terms of any advice provided and make demands on Chambers that are simply not realistic. The suggestion that paper bundles sent to Chambers will not be printed by the CPS is petty.

(V) FUTURE RELATIONS

We are partners in the administration of the Criminal Justice System. It could not operate without us. Over the last decade or so, the working relationship between us has deteriorated - and there may well have been fault on **both** sides.

We wish to improve that working relationship and we are optimistic that your appointment as the new Director of Public Prosecutions will be the start of a new and better era for CPS/Bar relations.

As one of our former Leaders, our congratulations are warmer and more heartfelt than they could have been for any other. We stand ready to help in any way we can to improve the service the nation expects from the Crown Prosecution Service. We ask only that we be regarded as constructive partners rather than simply outside contractors and that at least a dialogue is opened very soon over the question of remuneration.

Kerim Fuad QC
Leader of the South Eastern Circuit
3rd December 2018

APPENDIX 1
Effective Trials and Cracked Trials Fees scheme c

Offence class	Page Cut-off	Standard Base Fee	Standard Base Fee ÷ 2 (i.e. per day)	*Standard Base Fee -Discount 40% ÷ 2*	*% Discounted Fee below Daily Fee*	*Standard Base Fee -Discount 25% ÷ 2*	*% Discounted Fee below Daily Fee*	Enhanced Base Fee	Enhanced Base Fee -Discount 40% ÷ 2	Enhanced Base Fee -Discount 25% ÷ 2	Daily Fee (days 3 to 40)	Daily Fee (days 41+)	Witness Uplift (first 10 excluded)
A	1000	1760	880	528	*15%*	660	*-6%*	3040	912	1140	**620**	330	3.33
B	500	1000	500	300	*38%*	375	*22%*	2140	642	802.5	**480**	330	3.33
C	500	570	285	171	*60%*	213.75	*50%*	950	285	356.25	**430**	330	3.33
D	500	860	430	258	*40%*	322.5	*25%*	1710	513	641.25	**430**	330	3.33
E	500	480	240	144	*56%*	180	*45%*	950	285	356.25	**330**	330	3.33
F	500	480	240	144	*56%*	180	*45%*	1140	342	427.5	**330**	330	3.33
G	2500	1140	570	342	*20%*	427.5	*1%*	3990	1197	1496.25	**430**	330	3.33
H	500	520	260	156	*64%*	195	*55%*	950	285	356.25	**430**	330	3.33
I	500	670	335	201	*53%*	251.25	*42%*	1760	528	660	**430**	330	3.33
J	500	1330	665	399	*23%*	498.75	*4%*	2190	657	821.25	**520**	330	3.33
K	2500	1570	785	471	*9%*	588.75	*-13%*	4470	1341	1676.25	**520**	330	3.33

APPENDIX 2

"Expectation of Counsel" from CPS South East to Heads of Chambers

Expectation of Counsel

- Counsel should at all times when in communication with CPS do so using a CJSM account:

  se.crowncourt@cps.gov.uk

- All Chambers and Counsel to be Egress registered.

- All Counsel must provide a written advice within 14 days of receiving the brief following service of the case. The advice should contain an analysis of the evidence in relation to the case strategy and indicate any further action that needs to be taken. Disclosure issues must also be advised upon.

- The expectation is that instructed Counsel will retain the brief and conduct any trial. Whilst it is understood that this is not always possible every effort must be made to ensure Counsel is available. Late returns without good reason are not acceptable. Any change of Counsel at this stage must be made with the agreement of CPS. CPS must be notified as soon as it becomes apparent that instructed Counsel may not be available so that careful consideration can be given to alternative Counsel.

- In this situation it is the responsibility of Chambers to identify suitable replacement Counsel prior to seeking the approval of the CPS.

- Trial Counsel must attend the PTPH where available, if not then the PTPH advocate to arrange a trial date for nominated Counsel.

- If allocated Counsel cannot attend a hearing then the expectation is that another Counsel of the same grade will attend. If this is not possible there must be consultation with the Reviewing Lawyer/PO/PBM.

- Counsel is expected to check with their clerk that they have all the bundles that have been sent to Chambers. CPS staff are not permitted to print out bundles for Counsel who arrive at court without the necessary paperwork.

- Counsel is expected to have read the bundle and be fully appraised of the facts of the case and therefore able to deal with any issues that may arise.

- Counsel should not communicate directly with an OIC as far as evidential matters concerning the case are concerned.

- Counsel must report to CPS office on arrival at court.

- When attending for PTPH counsel must ensure thorough case management takes place in accordance with the directions given by Fulford LJ and that the hearing is not reduced to one

of date setting. Counsel is instructed to be robust. A clear understanding of the case strategy should enable counsel to lead on conversations concerning the real issues in the case.

In all RASSO and CCU cases charged on or after 26 March 2018 a Disclosure Management Document (DMD) will be completed and will be uploaded to the Applications section of DCS. The purpose of the DMD is to identify what has been considered by the Disclosure Officer and the Prosecutor to be a reasonable line of enquiry in the case together with a comprehensive summary as to how all seized electronic devices and third party material has been dealt with. The purpose of the DMD is to set out in a transparent way how disclosure has been managed in the case to date. It should explain to the defence and to the court what we are doing as well as, importantly, what we do not intend to do.

At the PTPH Counsel must invite the defence to identify any additional lines of enquiry that they consider to be reasonable and which have not yet been undertaken. This will enable the Judge to robustly manage the case from the outset and forms an essential part of Better Case Management.

Counsel must resist any orders a Judge seeks to make with compliance in less than 7 days. If an order is being made that counsel will need to comply with, for example the drafting of an opening note, Counsel must be satisfied they will be able to comply with that order.

Counsel must ensure any orders made are relevant and specific.

Counsel must resist the Judge making blanket stage 1 Orders and seek instead individual orders for service, unused, BCE, hearsay, SM applications etc.

Counsel must consider timing and ensure the date for compliance of the order takes account of the trial date.

Counsel should not agree to shorten timetabling unless this has specifically been agreed with the reviewing lawyer in advance of the hearing.

Counsel must avoid any unnecessary hearings and where possible endeavour to deal with any issues at court by speaking to a CPS lawyer or manager.

Counsel must always consult with a CPS lawyer or manager before making decisions such as acceptability of pleas, the acceptability of a basis of plea, whether an adjournment is required. This list is not exhaustive and if in doubt counsel should seek initial advice from CPS staff at court as to whether consultation with a lawyer or manager is required.

Counsel is expected to adhere to the Speaking to Witnesses at Court policy so that witnesses are supported in giving their best evidence at court. This will ensure that witnesses are properly assisted at court, are better prepared and know what to expect before they give evidence.

- When dealing with defendants in custody Counsel must ascertain the custody time limit, announce it in court and make a note on their back sheet /attendance note to that effect.

- When dealing with custody cases Counsel must seek a trial date within the CTL.

- Counsel must apply for a sentence uplift in all cases where a hate crime has been committed and ensure that the judge states in open court when passing sentence what the uplift was. This must also be recorded on the back sheet and attendance note.

- Counsel must provide a back sheet/attendance note fully setting out what happened in every hearing. This must be sent to CPS via the appropriate mail box within 12 hours of the hearing so that the case can be updated.

- In the event of a terminatory ruling Counsel must seek an adjournment overnight and provide a full written advice to the reviewing lawyer as to the merits of appealing the ruling.

- In the event of a hung jury Counsel must provide a full written advice on the merits of proceeding to a re trial taking full account of the evidence as it was presented in the trial noting any weaknesses in the case that may have led the jury being unable to reach a verdict

APPENDIX 3
Letter from CPS South East
relating to Disclosure Management Documents

CPS

Private and Confidential

[redacted]

Thursday 01 November 2018

Dear [redacted]

I write to update you about a national amendment to the CPS instructions to counsel form which accompanies the prosecution brief. I would be grateful if could bring this development to the attention of the members of your chambers.

By way of background, one of the actions from the Joint National Disclosure Improvement Plan was to develop best practice from the current CPS serious casework regime and to extend the use of Disclosure Management Document (DMD) to other Crown Court cases. The DMD was trialled in all cases dealt with by the CPS Rape and Serious Sexual offences Units and Complex Casework Units. The pilot period has concluded and the use of the DMD will now be "business as usual" going forward in these cases.

The DMD sets out for the defence and for the court what has been considered a reasonable line of enquiry in the circumstances of the case and what approach has been taken to any digital devices and third party material. In the first instance, the police are required to set out what has been considered a reasonable line of enquiry in the circumstances of the case. This is done through the insert into the MG3, which is the form that the police use when they set out the details of the case in a request for charging advice. The prosecutor can then make an informed assessment of whether there are reasonable lines of enquiry that remain outstanding and the impact that this has on whether the case meets the Full Code Test. The prosecutor will set out what reasonable lines of enquiry have been followed in the DMD so that the defence and the court have this information in advance of the Plea and Trial Preparation Hearing (PTPH).

We see this as an essential step to changing the culture in how we deal with disclosure issues at a much earlier stage.

We have now incorporated standard paragraphs on the DMD into the instructions to counsel template form. Counsel will be instructed to address the quality of the DMD and confirm that they consider all reasonable lines of enquiry have been considered.

The template form also contains a link to the CPS guidance on communication data and reasonable lines of enquiry which contains further information on this matter. Attached to this letter is a copy of the template form and accompanying guidance for your information. The guidance can also be accessed electronically and the link to the guidance is set out here.

CPS South East, City Gate, 185 Dyke Road, Hove, East Sussex, BN3 1TL
Tel: 01273 765600 www.cps.gov.uk

Thank you for your support in ensuring that our new approach is put to practice at the PTPH by members of your Chambers.

Please contact Lisa Ramsarran, CPS on 01273 765645 or Kate Anderson, Head of Prosecution Policy and Inclusion Unit, CPS on 020 3357 0563 if you have any queries about the DMD.

Yours faithfully

P. Jhmson.

'aul Stimson
)eputy Chief Crown Prosecutor
:PS South East Area