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DELF

DEFENCE EXTRADITION LAWYERS FORUM

NEWS

Welcome to the Defence Extradition Lawyers Forum newsletter, edition 17 – which was to be, predictably, Brexit focussed. Given recent developments this edition now has just a hint of Brexit amongst its other gems, including Thom Dieben and Luce Smithuijsen's explanation of what it looks like from the Netherlands and, in non-Brexit related news, Jonathan Swain's summary of Konecny v District Court in Brno-Venkov, Czech Republic [2019] UKSC 8 and Ed Grange and Danielle Reece-Greenhalgh's analysis of Article 3 of INTERPOL's Constitution. Thom and Luce's article is the first in a series of updates from across Europe explaining how Brexit is affecting our colleagues working outside the UK, of which more in Newsletter 18.

A message from the Chair

Dear Member,

It is, as ever, my pleasure to welcome you to our excellent newsletter! We have had a busy start to the year and I am very grateful to all our new members and to those who have renewed - 2019 already promises to be a year to remember!

Our annual dinner (24 May 2019) had to move to a larger venue this year and even then we sold-out with unprecedented speed! We have secured a fantastic speaker and have some exciting additions for this year's event; more details will follow in the near future. I am very sorry to those of you who were not able to obtain tickets; we really didn't expect to sell out and so fast.

The DELF Brexit event provided a fascinating evening and we are very grateful to Alun Milford (Kingsley Napley) and Helen Malcolm QC (3 Raymond Buildings), two genuine leaders in their field. Despite the ongoing political uncertainty, our speakers were illuminating. We may well have to have a second meaningful-seminar once we know exactly what is actually happening with our departure. Huge thanks also to Doughty Street chambers and Peter Caldwell for hosting the event.

We also held a seminar on 'Forum' and cross-border investigations and prosecutions. Again, it was a superb evening and we were very lucky to have a panel of such expertise: Anand Doobay (Boutique Law), Alison MacDonald QC, (Matrix), Maximilian Müller (Prof. Müller and Partners, Münich) and Nick Vamos, (Peters & Peters). We are grateful to them all. We also offer our huge thanks to 5 St Andrew's Hill and Ben Keith for putting on the evening.

We will be launching the John RWD Jones QC essay competition soon for its second year. John remains very close to DELF's hearts and we look forward to sharing the details of this year's prize with you soon.

DELF continues to strive to represent your interests and our next meeting with the Senior District Judge is scheduled for the end of this month. Please do continue to get in touch with any issues you would like us to raise on your behalf.

Finally, plans are already underway for our second Annual Conference. We have a lot to live up to following the huge success of last year's event and we do hope you can join us on 13 September 2019.

Thank you very much indeed for your on-going support. We really do appreciate it. As ever, if you have any issues you would like to raise please do get in touch.

Ben Lloyd
6KBW

Our Recent Activities

Educational events and socials

Life after Brexit: none the wiser, but better informed.

On 27 March, Doughty Street Chambers hosted a combined Spring Social and Educational Event on the theme of Life after Brexit. Speakers Helen Malcolm QC and Alun Milford discussed the potential impacts of alternative Brexit scenarios on extradition practice and cross-border criminal justice co-operation. Helen gave the audience valuable insights into the operation of the European Convention on Extradition and the many notes and derogations with which practitioners may have to become familiar – again. Alun, who has recently joined Kingsley Napley, drew on his experience as a senior prosecutor at the SFO and CPS to explain how Brexit is likely to limit the scope and efficiency of mutual legal assistance and information sharing. Contributions from the audience highlighted the loss of defence rights in prisoner transfer and emerging Euro-bail and questioned what the legal basis for detention would be for existing EAW cases following a no-deal Brexit. By the end of the discussion, with many members of the audience holding their heads in their hands we were very glad of a glass or two of Europe's finest before heading on to the Lady Ottoline. Copies of the speakers' slides are available to members.

Forum: who gets to choose?

On 4th April, 5 St. Andrews' Hill welcomed an esteemed panel, Alison Macdonald QC, Nick Vamos, Maximilian Müller and Anand Doobay to discuss the question of Forum. The event was well attended and it left time for some really interesting questions afterwards – for those of you who could not attend a fuller write up will follow in the next edition of the newsletter.

On behalf of our members

In addition to the events that DELF puts on we continue to make representations on behalf of its members to the Criminal Procedure Rules Committee, the LAA, the Administrative Court staff and the Senior District Judge's office. Our next meeting with the Senior District Judge is scheduled for the end of this month. If members have any issues they would like DELF to raise please email enquiries@delf.org.uk.

Legal Update

Konecny (Appellant) v District Court in Brno-Venkov, Czech Republic (Respondent) [2019] UKSC 8

On 27 February 2019, the Supreme Court handed down it's decision in respect of Mr Konecny.

Mr Konecny had been convicted in his absence by the District Court in Brno-Venkov in the Czech Republic in May 2008 for three offences of fraud committed in 2004 and 2005. He was sentenced to eight years' imprisonment. The EAW which sought his surrender made clear that he was afforded an unqualified right to a re-trial upon the event of his surrender to the Czech Republic.

At first instance, Mr Konecny argued that his extradition would be disproportionate under Article 8 of the ECHR, and both unjust and oppressive to extradite him by virtue of the passage of time pursuant to section 14 of the Extradition Act 2003 ("the Act"). He argued that, as someone entitled to a re-trial he ought to be entitled to rely on the passage of time since the offences had occurred, rather than since the date of the conviction.

District Judge Ashworth ruled that, as a convicted person, the passage of time fell under section 14(b) of the Act. Consequently, the time period which he was entitled to consider only ran from the date of his conviction, and not the date of the offences. He concluded the extradition would be neither unjust nor oppressive, and would be a proportionate with Mr Konecny's Article 8 rights.

Mr Konecny appealed against the decision of DJ Ashworth, and similarly argued on appeal that the correct passage of time which should be considered in his case was from the date of the offences and not from the date of the conviction. On 27 September 2017, Sir Wyn Williams dismissed the appeal and similarly found that the correct period of time should run from the date of conviction, upholding the decision of the District Judge.

On 07 November 2017, the High Court certified a point of law:

"In circumstances where an individual has been convicted, but that conviction is not final because he has an unequivocal right to a retrial after surrender, is he 'accused' pursuant to section 14(a) of the 2003 Act, or 'unlawfully at large' pursuant to section 14(b) for the purposes of considering the 'passage of time' bar to surrender?"

Before the Supreme Court Mr Konecny argued that, as a matter of EU law, he was an accused person and not a convicted one. Reliance was placed principally on the decision of the CJEU in Proceedings concerning IB (Case C-306/09) [2011] 1 WLR 2227, as well as Criminal proceedings against Tupikas (Case C-270/17PPU) [2017] 4 WLR 188 and Criminal proceedings against Zdziaszek (Case C-271/17PPU) [2017] 4 WLR 189.

Mr Konecny also relied on domestic authorities, and previous extradition legislation prior to the 2003 Act, to argue that courts in the UK had been willing to treat a person convicted in his absence, but entitled to a re-trial, as an accused person.

Lord Lloyd-Jones gave the lead judgment of the Court, with whom the panel comprised of Lord Kerr, Lord Hodge, Lady Black and Lord Kitchin agreed.

The Court held that Mr Konecny's reliance on EU law was not made out (§28). Had the CJEU in IB intended to draw the conclusions which Mr Konecny now invited the Supreme Court to find then "it would have effected a fundamental change in the operation of the EAW scheme…[which] would have been expressed by the [CJEU] in the clearest terms possible" (§27). It had not done so.

The Court went on to find that the EAW scheme was intended to be a departure from previous extradition regimes, and the Framework Decision did away with any reference to the previously established practice in respect of "contumacious convictions" being treated as accusations (§31). Section 20 of the 2003 Act made comprehensive provision for such cases, without requiring or permitting them to be treated as accusations (§32). The approach advocated by Mr Konecny was "inconsistent with the EAW scheme and the express provisions of the statue" (§34).

Lord Lloyd-Jones went on to consider the domestic authorities where individuals who had been convicted in absentia but had a right to a re-trial ought to be treated as accused persons (§42-49). The Court summarised the relevant principles to be applied by the Court when seeking to characterise the case as accusation or conviction (§50):

1) The dichotomy drawn by the Framework Decision between accusation warrants and conviction warrants is a matter of EU law. The Framework Decision does not have direct effect but national implementing legislation should, so far as possible, be interpreted consistently with its terms.
2) The court should seek to categorise the relevant facts by reference to their status and effects in the law and procedure of the member state of the requesting judicial authority.
3) Ordinarily, statements made by the requesting judicial authority in the EAW or in supplementary communications will be taken to be an accurate account of its law and procedure but evidence may be admitted to contradict them.
4) A person may properly be regarded as convicted for this purpose if the conviction is binding and enforceable under the law and procedure of the member state of the requesting authority.
5) For this purpose, it is not a requirement that a conviction should be final in the sense of being irrevocable. In particular, a convicted person who has a right to a retrial may, nevertheless, be properly considered a convicted person for this purpose, provided that the conviction is binding and enforceable in the law and procedure of the member state of the requesting authority.
6) While the view of the requesting judicial authority on the issue of characterisation cannot be determinative, the question whether a conviction is binding and enforceable will depend on the law of that member state.
7) In respect of the application of s14, the Court found that persons such as Mr Konecny would be subject to a disadvantage by the terms of section 14 of the Act; a deficiency of the statute "which requires consideration by the legislature at an early opportunity" (§54).

However, until such time as this can occur, Article 8 provides the "appropriate and effective alternative means of addressing passage of time resulting in injustice or oppression in cases where the defendant has been convicted in absentia". Where it is maintained that the passage of time could result in injustice to the re-trial, that too could feature in the balancing exercise and would be "highly relevant" (§57).

As far as Mr Konecny's specific case, he was correctly considered to be a convicted person (§60), and the Court found that the decision of the District Judge was not wrong (§70) though, like Sir Wyn, "might have been more troubled" by the length of the delay than the District Judge had been.

Lord Lloyd-Jones concluded at §71 by stating that Mr Konecny had raised other potential instances of substantive unfairness which might arise from characterisation of convicted rather than accused. However, the Court did not address them as they did not arise in the appellant's particular circumstances.

It is yet to be seen whether there will be some further challenge made in this respect.

Jonathan Swain
Drystone Chambers

INTERPOL under the spotlight

The process of electing INTERPOL's new President late last year attracted the attention of the world's press and forced INTERPOL's governance and political neutrality into the spotlight once more. The need for a change in leadership was brought about following the sudden disappearance and apparent detention of former President Meng Hongwei in China.

Emerging as the frontrunner for the unexpectedly vacant position was Alexander Prokopchuk, a Russian general with close ties to Vladimir Putin, who had formerly occupied a role within Russia's Ministry of the Interior. His candidacy reignited a longstanding and unresolved debate surrounding Russia's abuse of the INTERPOL system. Concerns raised by critics of the Kremlin (notably Bill Browder and Mikhail Khodorkovsky) centred on allegations that Prokopchuk had made routine use of red notices to target political opponents of Putin whilst in government. These

allegations were afforded further weight by direct correspondence from Fair Trials to the Secretary General of INTERPOL, which stated that "it would not be appropriate for a country with a record of violations of INTERPOL's rules (for example by frequently seeking to use its systems to disseminate politically motivated alerts) to be given a leadership role in a key oversight institution."

INTERPOL's 194 members ultimately voted to award the presidency to South Korean Kim Jong-yang. Nevertheless, the widespread outcry about Prokopchuk and the question of Russia's abuse of the red notice system continues to call into question whether the existing safeguards of INTERPOL's political neutrality are effective. After all, Prokopchuk may not hold the title of President but he remains a Vice President of INTERPOL and sits on the Executive Committee. His compatriot, Petr Gorodov, sits in the Request Chamber of the Commission for the Control of INTERPOL's files ("CCIF"), which is responsible for the processing of requests relating to red notices, and importantly makes recommendations for the removal of such notices to the General Secretariat, which nearly always follows the recommendation given.

These concerns about the political neutrality of the INTERPOL bodies which are entrusted to take life-changing decisions about when red notices should be issued and deleted are particularly important when an individual affected by the red notice claims that it is tainted by political motives.

If an individual seeks removal of a red notice because it is so tainted, he or she can only apply to the CCIF by reference to an extremely limited and narrow set of legal rules, including INTERPOL's own Constitution.

The most important rule in this context is Article 3 of INTERPOL's Constitution which states that "It is strictly forbidden for the Organization to undertake any intervention or activities of a political, military, religious or racial character." Article 3 reflects one of the founding resolutions of INTERPOL's General Assembly, Resolution AGN/20/RES/11, which provides that: "…no request for information, notice of persons wanted and, above all, no request for provisional arrest for offences of a predominantly political, racial or religious character, is ever sent to the International Bureau or the NCBs, even if – in the requesting country – the facts amount to an offence against the ordinary law."

To assist the practitioner in the application of Article 3, INTERPOL published a 'Repository of Practice' in February 2013. This drew a distinction between pure offences (i.e. acts criminalised solely due to their political nature, e.g. espionage) and relative offences (i.e. acts comprising elements of ordinary law crimes but which nonetheless have a political dimension). In relation to the latter, INTERPOL adopts a so-called "predominance test". In relation to both pure and relative offences, Article 34(3) of INTERPOL's Rules for the Processing of Data provides that the "main pertinent factors" to be considered in the context of an Article 3 claim include:

a. The nature of the offence, namely the charges and the underlying facts;
b. The status of the persons concerned;
c. The identity of the source of the data;
d. The position expressed by another National Central Bureau or another international entity;
e. The obligations under international law;
f. The implications for the neutrality of the Organization; and
g. The general context of the case.

When analysing the nature of the offence, the CCIF will consider information beyond that provided in the Red Notice application form, such as information concerning the background to the request or how it relates to other requests. For example, it may be relevant to assess a red notice request together with similar requests concerning other individuals wanted by the same country, or to consider the fact that such similar requests may have been denied in the past.

The Repository of Practice sets out various scenarios arising from the Article 3 case law. It is striking that all of these scenarios concern what could be labelled as overtly political offences such as treason, military crimes, election crimes,

free speech violations by human rights activists or crimes committed by politicians during seizures of power. None of the scenarios describes a paradigm "relative offence", such as a non-politician who alleges he is being persecuted by a State on account of his economic success in a strategically important sector. Of course, this is precisely the type of conduct which Propopchuk's detractors allege he was instrumental in prosecuting at the Kremlin's behest. The failure of the Repository of Practice to provide meaningful guidance on relative offences – and how the predominance test should be applied to relative offences – demonstrates the challenge faced by those in challenging red notices on Article 3 grounds where the underlying conduct is not criminalised solely due to its political nature.

The Repository of Practice states that one of the primary objectives of Article 3 is to reflect international extradition law. However, when read with Repository of Practice, Article 3 adopts a definition of "political" which is arguably narrower than the test currently applied in many extradition laws or indeed the Refugee Convention. In the UK, the Extradition Act 2003 bars a person's extradition (whether to an EU Member State or to a State outside of the EU) if (and only if) it appears that:

a. The request for extradition (though purporting to be made on account of the extradition offence) is in fact made for the purpose of prosecuting or punishing the person on account of his […] political opinions, or
b. If extradited the person might be prejudiced at his trial or punished, detained or restricted in his personal liberty by reason of his […] political opinions.

Historically, UK extradition law adopted a definition of "political opinion" that was wider than that contemplated by INTERPOL. Taking their cue from immigration case law, the UK's extradition courts recognised that, in order to show persecution on account of political opinions, it was not necessary to show political action or activity; that political opinions could be imputed to the person whose extradition was sought; and that it was inappropriate to maintain a rigid distinction between political and economic opinions. None of these factors – which highlight the flexibility of the concept of "political" – are explicitly recognised in INTERPOL's Repository of Practice on Article 3.

In light of this divergence, an individual faced with a red notice may (at present) be in a better position contesting extradition and/or claiming asylum, and using success obtained in those proceedings as a basis to persuade INTERPOL to remove the red notice. This comes with two precautionary caveats. The first is that INTERPOL's own policy on asylum, published in 2014, recognises a limitation on the grant of asylum on political grounds (whereas no such limitation is recognised if asylum is granted on all other grounds under the Refugee Convention, e.g. religion, race, sexuality etc.) A person granted refugee status on the basis of political persecution does not therefore have a cast iron guarantee that his status will result in the red notice being removed. The second caveat is that if caught up in active extradition proceedings in the UK, practitioners will need to consider an asylum claim at the earliest possibility. This is because, in a shift away from the historic position, extradition courts have, over the past four years, increasingly embraced a restrictive interpretation of 'political opinions', which has detached itself from the principles derived from immigration case law summarised above. This shift appears to have been motivated by the narrow interpretation adopted by the then Senior District Judge Riddle in the case of the Russian Federation v Kononko, as opposed to the wider interpretation adopted by his predecessor, Senior District Judge Workman, in the case of the Russian Federation v Makhlay and Makarov. With this narrowing of the interpretation of political opinion, it is clear, in an extradition context, that a mere political interest in a case will be insufficient to establish the bar of extraneous considerations.

In addition, unlike extradition cases, proceedings for asylum allow for the provision of anonymous witness and expert evidence, which cannot be shared or challenged by the requesting state. The client himself can also give evidence without being the subject of hostile cross-examination in open court. Therefore, in some cases, and depending always on the facts, asylum may be easier to claim than a discharge from an extradition request if the client asserts that he is the victim of a political persecution. A successful grant of asylum will result in the client's automatic discharge from the extradition proceedings.

Just as it is virtually impossible to claim asylum in the UK in respect of alleged persecution in another EU member state, so too there are no recorded cases where an individual has been discharged from an extradition request issued by another Member State on the basis of his political opinions. It remains to be seen whether this may change post Brexit, when mutual trust and recognition could well be further eroded between the UK and the remaining EU27 States.

In summary, whilst it is preferable to have a successful extradition or asylum decision upon which to base representations to INTERPOL, the absence of such a decision is not fatal to an individual's chances of securing the removal of a red notice. However, it will be an extremely difficult task, made no easier by the restrictive interpretation of "political" in INTERPOL's Repository of Practice on Article 3. Despite the sigh of relief exhaled at the election of Kim Jong-yang over Alexander Prokopchuk, INTERPOL still has much to do by way of further reform to ensure that the organisation becomes the model of political neutrality which it clearly seeks to be – both in terms of its perception by Member States and in the independence of the decision-making it applies to the issuing and removal of red notices which are tainted by political motives.

This article was previously published by CrimeLine and Lawyer Monthly

Edward Grange and Danielle Reece-Greenhalgh
Corker Binning

Update from the Netherlands

Brexit impact on extradition: a Dutch perspective

As Brexit is nearing, EU Member States are anticipating a new way of co-operating with the United Kingdom. This short contribution addresses the subject of extradition, and how the different possible Brexit outcomes may impact it.
Of course, there is still the (slim) possibility of no Brexit – or at least an extension of British EU membership. In this case, the extradition situation will (obviously) remain the same: extradition will be possible through European Arrest Warrants (EAW) based on the Council Framework Decision for as long as the UK remains a Member State. This is also the position of the Amsterdam District Court following the RO judgement of the CJEU (see, for example, ECLI:NL:RBAMS:2019:654)

A more realistic approach is to anticipate on the UK leaving the EU (and doing so soon). There are two possible ways in which this could happen: with a deal or without one. It appears to be the position of the Dutch Public Prosecutor's Office that a no-deal Brexit will mean that extradition on the basis of an EAW is no longer possible. Extradition to and from the UK will from that moment onward be based upon the European Convention on Extradition. EAW's still pending before the Amsterdam District Court at that time should be declared inadmissible as far as the prosecution is concerned. We agree with this analysis.

If the draft Withdrawal Agreement is accepted there will be a three-year transition period. In principle, the EAW framework decision will continue to apply in full during this transition period (art. 62). However, pursuant to art. 185 of the draft Withdrawal Agreement, a Member State can declare – stated succinctly – that during the transition period it will not surrender its own nationals to the UK. It is our understanding that, for example, Germany has issued (or will issue) such a statement. To our knowledge, the Netherlands has not yet made any statement of this nature (or indicated its intent to do so). Since the Netherlands also extradites its own nationals under traditional extradition treaties such as the European Convention on Extradition, we doubt it will do so in the future.

The transition period could, nevertheless, be problematic for the Netherlands when it comes to extradition to and from the UK. This is because art. 1 of the the Dutch Surrender Act clearly defines "surrender" as a process involving Member States of the European Union on both ends (issuing and executing state). This means that a strict application of the Surrender Act would exclude surrender to the UK during the transition period. Whether the Amsterdam District

Court will be open to a more flexible interpretation of art. 1 remains to be seen. If it is not open to a flexible interpretation, there may the possibility of disapplying (parts of the) provisions of the Dutch Surrender Act on the basis of the doctrine of supremacy of EU law. Whether this will be an option will be decided in the Poplawski II case (C-573/17) which is currently pending before the Grand Chamber of the CJEU. This case was referred to the CJEU by the Amsterdam District Court in another context (surrender to Poland) but also concerns the question of supremacy of the provisions of the EAW Framework Decision. Pursuant to art. 4 of the draft Withdrawal Agreement "the provisions of Union law made applicable by this Agreement shall produce in respect of and in the United Kingdom the same legal effects as those which they produce within the Union and its Member States." This means that if the CJEU will rule that the EAW framework decision does not have supremacy over national law in a "normal" situation this will also be the case during the transition period. If the Amsterdam District Court will rule out a flexible interpretation of the Dutch Surrender Act and it is decided by the CJEU in Poplawski II that EAW Framework Decision does not have supremacy over national law, the only remaining solution will be an amendment of the Dutch Surrender Act. This will take at least several months but probably more than a year.

It should be noted in this regard that the concrete impact in the Netherlands of the Withdrawal Agreement (even it is ratified soon) may not become clear until somewhere end of 2019. This is because almost all UK EAW cases currently pending before the Amsterdam District Court have been adjourned sine die to await the outcome of the SF case (C-314/18). This referral concerns the validity of assurances given by the UK regarding the right of the wanted person to serve a custodial sentence in the Netherlands should a UK conviction follow. An opinion by the Advocate-General in the SF case – which is not dealt with under the PPU procedure – is expected somewhere in May, a judgement will probably follow several months later.

Finally, (the threat of) Brexit has also proven to have effects in criminal cases not involving EAWs. Recently, the Amsterdam Court of Appeal ruled that Brexit might increase flight risk, as UK citizens might be untraceable after they go back to their home country after it has withdrawn itself from the EU (see ECLI:NL:GHAMS:2019:512).
In conclusion, we will have to wait and see what the Brexit future will bring. At this moment, a 'hard' Brexit seems most likely. This option will definitely be the most radical one in terms of extradition for the Netherlands – and probably the rest of the EU, too.

UK Prisons breaching Article 4 CEU

In other news: last Friday (29 March), the Amsterdam District Court ruled that in light of, among other things, recent reports by HM Chief Inspector of Prisons for England and Wales, there is a real risk of treatment incompatible with art. 4 EU Charter of Fundamental Rights in UK prisons, in any event in HMP Birmingham, HMP Bedford and HMP Liverpool. It has therefore requested the prosecutor to enquire with the UK authorities in which UK prison the wanted person will be detained, how many individual cell space will be available there and what the other detention conditions will be. This interlocutory decision has not yet been published but this will undoubtedly happen in due course.

Thom Dieben and Luce Smithuijsen
JahaeRaymakers

Upcoming Events

DELF Annual Dinner

Join us for our annual dinner on Friday 24 May 2019 in the stunning ballroom of the Curtain Hotel. A five-star hotel in the heart of Shoreditch will provide a stellar venue for the most prestigious night in the Extradition calendar.

With a drinks reception and formal dinner complete with keynote speaker, followed by music and mingling, the event promises to combine fantastic networking opportunities with a sparkling social occasion.

The ticket includes a drinks reception and three-course meal with wine, followed by a live band and a cash bar.

Membership

Membership runs from January to December annually. If you wish to join DELF for the first time since 01 January 2018, please e-mail your name, professional title, firm / chambers / employer, e-mail address and the category of membership that you wish to join DELF under, with "DELF Membership" in the subject heading to the e-mail address membership@delf.org.uk and follow the payment instructions set out below.

Fees for 2019 are as follows:

£50 - Full Membership - Open (subject to approval by the Committee) to any Solicitor, Barrister or member of the Institute of Legal Executives practising in the field of extradition and legal academic staff, whose practice includes representing requested persons in extradition cases. Full membership is also open to lawyers practising outside of England and Wales whose practice includes representing requested persons in extradition cases

£25 - Associate Membership - Trainee Solicitors, Pupil Barristers and Paralegals

£15 - Correspondent Membership - Open to court staff and other lawyers practising in the field of extradition

Fees can be paid in a group payment by a firm or Chambers administrator, or can be paid individually. If you are paying for more than one member in the same transfer, please email the details of who you have paid for and at what levels of membership they are joining at to membership@delf.org.uk after you have transferred the membership fees.

If you are simply paying for your own membership fee, please use your name as a reference on the bank transfer. There is no need to email to confirm transfer in this case.

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