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DELF

DEFENCE EXTRADITION LAWYERS FORUM

NEWS

Welcome to the 25th edition of the Defence Extradition Lawyers Forum newsletter. In this edition we have two case updates from Christina Russell and Jessica Williams from Boutique Law: one case examining Othman principles in relation to a flagrant risk that article 6 rights would be breached by an EU member state (Romania) and a second recent case considering the continuing problems with assurances from the Russian Federation. We also have an excellent summary of recent developments in appeal procedure from Stefan Hyman, helpfully setting out the principles and relevant time limits before examining recent case law. Finally, the newsletter also contains our usual updates on recent work, upcoming events and consultations. With many thanks to our contributors.

A message from the Chair

Dear All,

Welcome to the summer edition of the DELF newsletter. Thank you to all the contributors to this edition and in particular to Áine Kervick for her tireless work in collating, preparing and editing of the newsletter. We are looking forward to seeing members at our first in person drinks event on 28 July at the National Liberal Club Terrace. We are looking at organising an in-person conference for the Autumn. As yet we do not know the COVID restrictions but please keep Friday 15 October free for what we hope will be a full day conference in central London. Once we have more details we will let you know.

Ben Keith

5 St Andrew's Hill

Our Recent Activities

We continue to make representations on behalf of our members to the Criminal Procedure Rules Committee, the LAA, the Administrative Court staff and the Senior District Judge's office. If members have any issues they would like DELF to raise please email enquiries@delf.org.uk.

ONLINE SURVEY OF DELF MEMBERS: call for evidence

The House of Lords Constitution Committee is undertaking an inquiry into the constitutional implications of COVID-19.

In particular, it is exploring the impact of the pandemic, and the Government's response to it, in relation to the operation of the courts. The Committee is calling for evidence on the workings of the courts and tribunals in response to the pandemic and what the future of the justice system might look like as a result.

DELF is keen to relay the experiences of our members from the last 18 months and present their views as to future proposals in relation to the use of CVP in particular.

To assist in collating the data that will form the basis of our response to the consultation we invite members to participate in the online survey that can be found **here.** We encourage all our members to respond and welcome any additional written representations you may wish to make.

The deadline for the survey is Friday 23 July.

Upcoming Events

DELF Summer Social

Following the changes to the easing of lockdown restrictions, we have changed the date of the DELF Summer Social to Wednesday 28 July. It will still take place at the National Liberal Club, 1 Whitehall Place from 6pm.

If you have already signed up and still want to attend on the new date, you do not need to do anything. If you would like to come, or if you are no longer able to come, please email the DELF Administrator at admin@delf.org.uk.

Case Update:

Popoviciu v Curtea de Apel Bucuresti (Romania)

The recent decision in *Popoviciu v Curtea de Apel Bucuresti (Romania)* is said to be the first case in which the High Court has concluded that extradition to an EU Member State represented a real risk of "flagrant denial" of a requested person's Convention rights. Whilst Holroyde LJ's assessment that this was *"in many ways an extraordinary case"* is almost an under-statement, the issues considered are interesting and relevant to other cases with more ordinary factual matrices.

This was a conviction EAW case. There was evidence of behaviour by the trial judge which was so extreme and so inappropriate that if true there could be no question but that a conviction by him could not reasonably be argued to be Article 6 compliant. If the evidence was accepted, then for Mr Popoviciu to be extradited to Romania and imprisoned would be a gross violation of Article 5. The court observed that, in response, not only did Romania not put forward any evidence or information to dispel the concerns, it also asserted that even if the judge had been as corrupt as alleged this would not in Romania constitute a reason to review Mr Popoviciu's conviction.

Holroyde LJ set out the familiar *Othman* test - *"A flagrant denial of justice goes beyond mere irregularities or lack of safeguards in the trial procedures such as might result in a breach of art.6 if occurring within the Contracting State itself. What is required is a breach of the principles of fair trial guaranteed by art.6 which is so fundamental as to amount to a nullification, or destruction of the very essence, of the right guaranteed by that article."* The court also referred to the fact that where such evidence is adduced, it is for the Government to dispel any doubts about it. The court reiterated that the threshold for flagrant unfairness is

high.

The court concluded that the high threshold could be reached by aggregating a number of deficiencies in the trial none of which individually amounted to a flagrant denial of justice. Romania had submitted (relying on *Orobator)* that it could not. Whilst *Orobator* undoubtedly raises interesting questions as to when a breach of Article 6 converts into the higher bar of a flagrant denial of justice, Holroyde LJ viewed it as implicit in the court's approach in *Orobator "that such a combination could in principle amount in the aggregate to a flagrant denial of justice even if no one feature would by itself have passed that high threshold"*. In fact, in this case no such aggregation was really required; making this finding *obiter*, but it may nevertheless be useful in some cases.

The second question with which the court engaged is perhaps more difficult. It concerns the test to be applied in order to establish a flagrant denial of justice and whether there is a difference between a case where there has already been a conviction (historical) and a case where the trial is yet to take place (future).

The question the court asked itself was whether it was necessary for Mr Popoviciu to prove on the balance of probabilities that his trial did in fact involve such flagrant unfairness as to deprive him of the essence of his Article 6 rights. This argument opens a whole series of interesting questions for the courts because if it is correct then exactly how far should a requested person be allowed to go in seeking to show that there has been a flagrant denial of justice in his trial? In a case such as this one where the problem is specific to the judge himself the trial itself is less relevant, but in a case where a combination of features may amount to a flagrant denial of justice there would have to be more investigation of the trial itself. In this case Romania had argued that *Symeou* clearly prohibited a requested person from using the extradition proceedings to re-litigate the issues at his trial. The court agreed that in the magistrates' court in this case an impermissible attempt to re-litigate issues properly determined by the Romanian court had been made. However, there is a fine and perhaps indistinct line between what evidence can and cannot be admitted about a trial where flagrant denial is argued.

The conclusion of the court in *Popoviciu* was that the correct test was *"substantial grounds for believing that there was a <u>real risk</u> that the requested person's trial had been flagrantly unfair"* [emphasis added]. The Court felt that *"it would be wrong in principle to place a requested person who claimed he had in fact suffered a flagrantly unfair trial (and consequently would suffer arbitrary imprisonment if returned) at a disadvantage compared with one who feared that he would suffer a flagrantly unfair trial in the future"*.

Exceptionally the court accepted oral as well as written evidence. A witness gave oral evidence for several hours about the judge and his conduct. The evidence was not accepted unquestioningly by the court which expressed grave concerns about some of both the oral and the written evidence before it. As Holroyde LJ wrote of those who testified as to their association with the trial judge: *"No one emerges with much credit from this evidence"*. However, the court did identify credible evidence of sufficient concern of several matters involving the judge. These included that the judge had a long-standing and corrupt and improper relationship with at least two individuals, including the complainant in the case against Mr Popoviciu with whom he had also had recent contact at the time of Mr Popoviciu's trial. Unsurprisingly the court was concerned by this evidence.

The court then turned to Romania and what it had done to dispel the doubts. The court felt that Romania had *"plainly failed to put forward any evidence or information which dispels these concerns"*. This, combined with Romania's assertion that the evidence even if true *"would not constitute a reason to review a final decision"* plainly troubled the court. Romania had relied instead on the curative effect of the unsuccessful appeal by Mr Popoviciu in Romania. However, in the court's view, an appeal conducted in ignorance of the evidence now available about the judge had not been able to take into account important matters affecting the reliability of the prosecution evidence and the impartiality of the judge's assessment of it.

This case serves as a useful example of a practical application within the UK of the principles set out in

Othman. It re-emphasises how serious the breach needs to be to amount to a flagrant denial. The extraordinary facts are perhaps unlikely to be repeated but nevertheless it may prove to be the start of a shift towards a willingness by the courts to engage with the arguments of those who assert that their trial, even if held in an EU state, was a flagrant denial of justice.

Christina Russell and Jessica S. Williams
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Case Update:

Russian Federation v Alevtina Kalashnikova

On 24 May 2021, District Judge Sam Goozée handed down his judgment in *Russian Federation v Kalashnikova* ordering the discharge of the requested person (**'RP'**) who was the subject of two extradition requests from the Russian Federation (**'RF'**). The RP had been a director of airline VIM-Avia LLC and the extradition requests related to offences which came to light after the collapse of the airline.

Mr Keith QC and Mr Watson QC raised challenges on behalf of the RP which included a section 87 challenge in that the extradition of the RP would not be compatible with her Article 3 rights owing to the inhuman and degrading prison conditions she would be subjected to if she were to be extradited.

The DJ considered the judgement of then Senior District Judge Arbuthnot in *Russian Federation v Tsurcan, Egorova, Kindrachuk & Smychkovsky ('RF v Egorova')* ordering the discharge of four individuals (the RPs) who were the subject of separate extradition requests from the RF. In her judgment the SDJ made specific reference to a federal law being discussed in Russia to safeguard the independence of the regional Commissioners for Human Rights ('**CHRs**'). The SDJ also set out the type of evidence she would expect from the RF. This included assurances in relation to the following: transportation of the RPs; availability of medication and appropriate tests and treatment; and photographs of all the detention centres and any colonies. The SDJ said that the British Embassy should be asked to consider whether they would be willing to monitor the assurances and that information in relation to the length of time RPs are held in quarantine before being moved to the main part of each prison should be provided.

The DJ noted in his decision in this case that following the above judgment a request was made by the CPS to the UK Foreign Office to assist in the monitoring of assurances using consular access within the RF to which no response was received.

Professor Judith Pallot (a researcher and academic on Russian prisons, particularly women's prisons, who had also given evidence in *Egorova*) gave evidence at the hearing that the assurance regarding pre-detention conviction would expose the RP to a violation of Article 3 and that the assurances were contradictory, less than reliable and missing important information (such as that there had been a fire at one of the pre-detention facilities which is likely to have led to a deterioration of the conditions). Professor Pallot raised concerns about the lack of specificity regarding the assurances of space to be afforded to the RP, the transportation of prisoners and the ability of the detention facilities to meet the RP's specific medical needs.

Professor Judith Pallot also gave evidence that since *Egorova* the efforts to strengthen the independence of the regional CHRs in Federal Law in early 2020 (which had now been adopted) had come to nothing, "*thwarted by the intervention of the federal agencies such as the FSIN and FSB themselves and as a body put forward as having responsibility for monitoring the delivery of the assurances given in the case of Ms Kalashnikova, they remain defective*."

The DJ described Professor Pallot's evidence as "most valuable", "impartial and independent" and "most helpful".
The DJ found the assurances regarding the RP's pre-trial detention to have been contradictory and found that the assurances regarding the space to be afforded to the RP were not precise enough to allow him to make an assessment. The DJ shared the Professor's concerns about the space that would be available to the RP in relation to post-conviction detention, had particular concerns regarding the assurances relating to prison transport and accepted the Professor's concerns regarding the RP's specific medical needs being met.

The DJ held that his most significant concern was whether the RF could provide a bespoke monitoring regime and whether the assurances were objectively verifiable. He accepted the Professor's evidence that the changes introduced under the new Federal Law had not safeguarded the CHRs independence. The DJ found that there were substantial grounds for believing that if the RP were to be extradited she would be subject to treatment contrary to her Article 3 rights.

In accordance with s.87(2) EA 2003 the DJ ordered the RP's discharge.

The clear consequence of the decision in this case, is that extraditions to the RF will not take place until such time as the RF establishes an effective independent monitoring system and addresses the mistreatment of prisoners across the prison estate. This is effectively the same message delivered by the SDJ in *Egorova*. However, what should have made a significant difference in this case is that this decision took place following the RF's efforts to strengthen the independence of the regional CHRs by adopting a federal Law.

In *Egorova*, the Chief Magistrate stated that it was *"encouraging to hear from the Professor that the Duma is discussing a federal law which will govern the regional CHRs giving them independence from state bodies and establishing their right to visit colonies…"* and said that *"the trouble is that law has not yet passed."* At the time of the decision in this case the federal law had been passed and a copy of the relevant law had been provided by the RF.

The implementation of the federal law should in theory have led to a more independent monitoring system with the CHRs being on an equal footing with the Public Monitoring Commissions ('PMCs'). However, Professor Pallot gave evidence which discredited the federal law post-adoption, and its impact, stating that "*… the main point is that the major problem I drew attention to, and that rights activists drew attention to, is that regional CHRs remain governed by regional law, and they were not given any powers under federal law. So, the FSIN and FSB and the MIA can all simply disregard the regional CHR" and that "The federal law failed to achieve what was intended*". The DJ accepted Professor Pallot's evidence that the changes introduced under the federal law had not safeguarded the CHRs' independence. It therefore appears that the RF will need to provide clear evidence of the CHRs' independence following the introduction of the federal law if it is to achieve its desired effect for the RF.

A further difference worth noting, although not given much significance by the DJ in the judgment, is that *Egorova* was decided before the pandemic. In *Kalashnikova* the defence submitted that conditions in the prisons had worsened since Egorova, not least on account of Covid-19 which had led to serious overcrowding within the particular prison. In the decision, the DJ made it clear that the primary issue of concern was whether the RF could provide a 'bespoke monitoring regime' and whether the assurances were objectively verifiable. It is interesting to note the use of the word 'bespoke' by the DJ. This suggests that the RF would need to provide a monitoring regime tailored to the individual in order to successfully obtain extradition. It is difficult to see how the RF will be able to achieve this, particularly with the UK Foreign Office appearing to be unwilling to get involved.

The issues facing the RF in any future request are significant and this decision suggests that a law masquerading as a change will not be sufficient in the face of an opinion by a respected expert that it has had no impact.

Jessica S. Williams
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Recent developments in appeal procedure

The High Court has recently set down important principles where a requested person seeks permission to appeal or to renew an application for permission appeal out-of-time.

A. Applications for Permission to Appeal

Principles

Where a requested person seeks permission to appeal against an extradition order made under Part 1, s. 26(4) requires that she give notice within seven calendar days. Importantly, this includes the date on which the order was made. The contents of an Appellant's Notice, together with the documents which must be attached, are set out in Crim PR

50.20(3). Within ten business days thereafter, the requested person may amend the Appellant's Notice (i.e., serve perfected grounds of appeal) (Crim PR 50.20(5).

From 15th April 2015, the introduction of s. 26(5) has afforded the High Court with discretion to consider late notice of an application for permission to appeal where "*the person did everything reasonably possible to ensure that notice was given as soon as it could be given*". Crim PR 50.20(4)(a) requires that a requested person and her legal representatives explain in witness statements what was done to ensure that the Appellant's Notice was served as soon as possible and exhibit any evidence.

In terms of time-frames for notice under s. 26(4), in *Mucelli v. Albania; Moulai v. Deputy Prosecutor in Creteil, France* [2009] UKHL 2, the majority held that procedural rules conferred by statutory instrument cannot constrict a right prescribed by statute. Therefore, the time limit for issuing an Appellant's Notice expires at 23:59 on the seventh calendar day [82-83]. If the ACO is closed during the "*whole of the last day"* on which notice is due (say, a Sunday or Christmas Day), then the Appellant's Notice can be issued/served at any point during the next working day [84]. However, where the ACO is open during at least part of the last calendar day, the Appellant's Notice must be received by 23:59 that very day [85]. Notably, the twilight deadline differs to the position in respect of all subsequent documentation where a business day concludes at 4.30pm (Crim PR 4.11(2)(d)).

Applications for Relief

Where an application for relief is made under s. 26(5), Crim PR 50.17(b)(i) allows a judge to determine the application without a hearing. In the recent authority of *Gawryluk v. District Courts of Lomza and Bialystok, Poland* [2020] EWHC 3679 (Admin), a Divisional Court (Coulson LJ; Holgate J) considered circumstances in which a requested person's legal representative issued/served the Appellant's Notice ninety-six minutes late. Together with the Appellant's Notice, the Appellant's solicitor explained that he (the solicitor) had recently returned from Poland following an urgent trip occasioned by bereavement. On considering the application on the papers, Sir Ross Cranston refused relief and referred to the Divisional Court's decision in *Szegfu v. District Court of Pecs, Hungary* [2015] EWHC 1764 (Admin).

In *Szegfu*, Burnett LJ (as he then was) held that the words in s. 26(5) are "*clear and require no judicial gloss*" [11]. The burden of proof rests upon the requested person to satisfy the Court to the civil standard that she did everything that she reasonably could to give notice as soon as possible after the deadline expired [12]. To evidence the application, the requested person (and possibly her solicitor) should file a witness statement containing a statement of truth. There must be "*comprehensive explanation covering the period of delay*" [12]. The merits of the underlying case are of no relevance [14]. Of some importance, the Court introduced the 'surrogacy principle'. It was held that, for purposes of s. 26(5), *the "person*" relates not *just* to the requested person herself, but to the acts/omissions of those acting on her behalf. As such, a requested person's *personal* responsibility cannot be divorced from the acts/omissions of her legal representative [15-18].

In *Gawryluk*, the 'surrogacy principle' was upheld [24-27]. The Court affirmed that a judge should consider the entire period of delay from the point of making the extradition order to the time at which the Appellant's Notice was filed/served and a corresponding application for relief made [21]. Moreover, if a judge refuses an application for relief, the Court held that a requested person cannot seek that the decision be reviewed or reconsidered at an oral hearing [39].

Although not referenced in *Gawryluk*, in *Szegfu*, Burnett LJ accepted that judicial review *could* serve as a residual discretion in "*rare circumstances*" where a requested person has not exercised a right of appeal against an extradition order [33]. This would bite where a judge refuses to grant relief. In *Regina (on the application of Navadunskis) v. Serious Organised Crime Agency* [2009] EWHC 1292 (Admin), a Divisional Court (Maurice Kay LJ; Collins J) held that judicial review may serve as an exceptional remedy where there is a "*supervening act"* [38] between the making of the extradition order and a requested person's removal, however, "*in a Part 1 case, circumstances […] will be rare in the extreme*" [41]. The Court gave examples of a "*grave [health] condition*" [21], a coup in the requesting state or "*genocidal behaviour"* [20]. The bar is thus extremely high.

Divergence between England and Northern Ireland

In *O'Connor v. Greece* [2017] NIQB 77, the High Court of Justice in Northern Ireland (Morgan LCJ; Gillen LJ; Burgess J) disagreed with the 'surrogacy principle'. The Court held that a distinction could be drawn between the

requested person and her lawyer's omissions and that a court should avoid penalising the former for a failure of the latter [14]. The Greek judicial authority appealed the case to the Supreme Court (UKSC 2018/0129). The case was listed for hearing on 30th March 2020. However, it was adjourned because of COVID19.

EU Fair trials Law

For 'legacy' Part 1 cases, where the underlying instrument is Framework Decision 2002/584/JHA, Art. 62 of the Withdrawal Agreement between the UK, EURATOM and the EU 2019 expressly provides that the Charter of Fundamental Rights of the European Union 2000 **("the CFR")** continues to apply when interpreting the law. Unfortunately, the same is not true of TACA cases. This is because s. 5(4) of the European Union (Withdrawal Act) 2018 expressly removes the CFR from domestic law.

The second subparagraph of Art. 47 of the CFR provides that "*Everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal previously established by law. Everyone shall have the possibility of being advised, defended and represented"*. In Art. 52(3), the CFR provides that "*the meaning and scope of [the CFR] rights shall be the same as those laid down by [the ECHR]"* but this "*shall not prevent Union law providing more extensive protection*".

In a settled but controversial line of authority, the Strasbourg Court determined that Art. 6 of the ECHR does not apply to immigration and extradition proceedings since they do not involve the determination of a civil right (see *Maaouia v. France* [2000] [GC] (Application: 39652/98 at [33-40] and the case law cited therein). However, given that subsequent EU fair trials legislation developed under Art. 47 of the CFR (see, *inter alia*, Directive 2010/64/EU, Directive 2013/48/EU and Directive 2016/1919/EU) have considered criminal proceedings and EAW FD proceedings as one, it is clear that EAW FD proceedings are supposed to operate in accordance with fair hearing principles and thus underpinned by Art. 47 of the CFR.

According to the Strasbourg Court's jurisprudence on Art. 6(3) of the ECHR (see, for instance, *Czekalla v. Portugal* [2003] (Application 38830/37 at [60-68]), in *some* circumstances a lawyer's failure to follow formal requirements *cannot* deprive her client of a right of appeal. Thus, it is arguable that in EAW FD cases that such principles can be read across via Art. 47 of the CFR. In the judgment before the High Court in Northern Ireland, there is no reference to the CFR. However, it may be that the Supreme Court will rule upon this issue in *O'Connor* and revisit the surrogate approach prescribed in *Szegfu*.

B. Late service of renewal notice

Where permission to appeal is refused on at least one ground, Crim PR 50.22(1) affords a party with the right to request an oral hearing. The request must be submitted within five business days.

Contents of Renewal Notice

Under Crim PR 50.22(3), legal representatives must give reasons for seeking to re-argue a point before a different judge. This is because the purpose of renewal is to demonstrate before a second judge that the first judge either failed to adequately grasp an argument or give reasons for a decision or erred in law.

Recently, the ACO has adopted a stricter approach to renewal notices which solely contain counsel's details without further elaboration or copy and paste the contents of the Appellant's Notice into a fresh document. In *Opalfvens v. Public, Prosecutor Antwerp, Belgium* [2015] EWHC 2808 (Admin), Irwin J (as he then was) guided:

> It will be clear, once proper consideration is given to the rule, that renewal requires thought. The grounds for renewal must grapple with the reasons given by the single judge and set out, briefly and concisely, why it is said the judge's decision was wrong. If that is not done, the appellant may be held to have failed to lodge grounds for renewal, to have failed to have applied for renewal, and the matter may be dismissed without a renewal hearing [24].

Consequences of late service

In *Oleantu-Ursache v. Judecatoria Bacau, Romania; Majewski v. Poland* [2021] EWHC 1437 (Admin), Johnson J considered two otherwise unrelated cases in which the applicants were refused permission to appeal on the papers and

wished to renew their applications for permission to appeal. However, their legal representatives had failed to serve a renewal notice within five-business days.

In line with the Divisional Court's analysis in *Gawryluk*, Johnson J held that that Crim PR 50.17(1)(b) does not provide the *exhaustive* circumstances in which the High Court may determine an application without an oral hearing. His Lordship drew a distinction between in-time and out-of-time appeals [27]. Where a notice for renewal is served in time and complies with the statutory requirements of Crim PR 50.22, there is a right to an oral hearing (Crim PR 50.17(b)(ii)). Where, however, a party makes an application out-of-time, there is not.

If the application for renewal is refused on the papers, there is no power for a second judge to re-consider the application [34-36]. As a matter of law, the appeal is dismissed. Instead, the remedy lies with an application to re-open permission to appeal. In such circumstances, there is a considerably higher bar as Crim PR 50.27 prescribes a test incorporating "*real injustice*" and "*exceptionality*".

Stefan Hyman
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Court Liaison

The Court liaison team continues to meet regularly with Westminster Magistrates' Court and the High Court. Given the issues with CVP and the changing COVID issues we have tried to keep members regularly updated with email circulars where there has been a change in policy.

We have met with the Senior District Judge via zoom and remain in regular contact. There still remain issues with proper access to the cells and interpreters which the Court is working on. There have been a few improvements and plans are being put in place by the Court but have not yet been actioned – we will continue to monitor the situation.

We are asked to remind members of the fact that at Westminster the Courts are recorded from 9.00am so comments and discussions are heard and have been noted on review of some of the recording. Please make sure that items subject to professional privilege are not discussed in court and that language used remains professional.

In addition the Court is being asked to complete 'cracked and ineffective trial' monitoring forms in extradition matters which will ask for comments from both sides. Please assist by providing explanations where appropriate.

Membership

Membership runs from January to December annually. If you wish to join DELF for the first time since 01 January 2020, 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.

Due to a lack of in person events last year we ended 2020 in a stronger financial position than anticipated. Our intention is to pass this benefit on to our members in in 2021 with discounted events as soon as they are possible.

Fees for 2021 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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For any queries, please contact enquiries@delf.org.uk

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