



Legal Aid
Agency

Director of Legal Aid Casework

Annual Report 2017-18





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Foreword

I am pleased to present the Annual Report of the Director of Legal Aid Casework for 2017-18.

My role as Director of Legal Aid Casework was created under the Legal Aid, Sentencing and Punishment of Offenders Act 2012 ("LASPO Act"). It involves decision-making on individual legal aid applications. The Director has sole responsibility for individual cases, ensuring that decision-making in this area is independent from Government.

I have held this role since 1 April 2016, which is when I took over the roles of both Director of Legal Aid Casework and Chief Executive of the Legal Aid Agency.

This report summarises the work carried out on behalf of the Director and includes decisions made and the processes followed.

There were a number of regulatory amendments during the year. This included domestic violence evidence requirements which resulted in updates to the Lord Chancellor's guidance under section 4 of the LASPO Act. There were also changes to legal aid eligibility for those victims of the Grenfell Tower fire who received compensatory payments.

Other items to note include:

- extension of the payment limits for certain criminal work under the LASPO Act to also cover related proceedings in the High Court, County Court or Family Court;
- payments for new proceedings relating to police bail;
- changes to payments for Crown Court cases.

As in previous years, I believe the Legal Aid Agency remains highly responsive to legislative and regulatory changes while continuing to support the role of Director of Legal Aid Casework.



Shaun McNally
Director of Legal Aid Casework

Introduction

1. The Director of Legal Aid Casework (“the Director”) is appointed by the Lord Chancellor under section 4 of the Legal Aid, Sentencing and Punishment of Offenders Act 2012 (“LASPO Act”). The role of the Director is to make determinations on the provision of legal aid in individual cases.
2. The Director acts independently from the Lord Chancellor and clear internal processes and structures are in place in the Legal Aid Agency (“LAA”) to ensure that this independence is maintained. These are set out in more detail in this report.
3. In practice, many of the functions exercised by the Director are delegated to the LAA. The LAA came into existence on 1 April 2013 and is an Executive Agency of the Ministry of Justice (“MoJ”). This followed the abolition of the Legal Services Commission, a Non-Departmental Public Body sponsored by the MoJ, which had previously made determinations on the provision of legal aid in individual cases.
4. The Director is supported by the LAA Board in ensuring that robust practices are in place to maintain the independence of the decision- making process for granting legal aid.
5. The roles of the Director and the Chief Executive of the LAA may be held by the same person. However, different accountability and reporting arrangements exist for the two roles. From 1 April 2016 both roles have been held by Shaun McNally.
6. This report explains how the Director has carried out the functions specifically entrusted to him under the LASPO Act over the last financial year. The LAA is separately publishing its Annual Report and Accounts which covers the wider remit of the organisation.

The Role of the Director

7. The Director is responsible for making determinations on individual applications for civil and criminal legal aid as set out in Part 1 of the LASPO Act.¹
8. Under the LASPO Act, the Lord Chancellor can issue directions and guidance to the Director about how to carry out his functions, but he must not issue such guidance in relation to individual legal aid applications. The Director must comply with any directions given and have regard to any guidance issued as well as acting in accordance with the LASPO Act and associated regulatory framework.
9. The Lord Chancellor has not published any new guidance documents in 2017-18. However, the Lord Chancellor has made amendments to pre-existing guidance documents to take account of amendments to regulations described below.
10. The Lord Chancellor has updated his guidance (under section 4 of the LASPO Act):
 - to take into account amendments made by the Civil Legal Aid (Procedure) Regulations in January 2018. These regulations amended the domestic violence evidence requirements, as detailed below.
11. The regulatory and legislative framework has also undergone the following changes in 2017-18:
 - The Civil Legal Aid (Financial Resources and Payment for Services) (Amendment) Regulations 2017 amended regulations 24 and 40 of the Civil Legal Aid (Financial Resources and Payment for Services) Regulations 2013. These regulations make provision about the rules the Director must apply to determine whether an individual's financial resources are such that the individual is eligible for civil legal services under Part 1 LASPO Act. Regulation 24 requires the Director to disregard certain payments when calculating an individual's disposable income or gross income. Regulation 40 requires the Director to disregard certain payments when calculating an individual's capital. The amendments to the regulations permit the Director to disregard when calculating disposable income, gross income and disposable capital any payment made to an individual who is a victim of the fire at Grenfell Tower on 14 June 2017, provided that the payment has been made because the individual is a victim of that fire (other than direct payments from an individual known personally to the victim). The amendments came into force on 14 July 2017.

¹ <http://www.legislation.gov.uk/ukpga/2012/10/part/1/enacted>

- The Civil Legal Aid (Procedure) (Amendment) (No. 2) Regulations amended regulations 33, 34 and 42 of the Civil Legal Aid (Procedure) Regulations 2012 and also added in two new schedules to those regulations. Regulation 33 sets out the forms of evidence of domestic violence which must be provided with an application for civil legal services under paragraph 12 of Part 1 of Schedule 1 LASPO Act. The amended regulation 33 removed the time limit of 60 months for certain types of evidence of domestic violence, or risk of domestic violence, and introduced new forms of evidence, listed in the new schedule 1, where the victim has sought the help of an appropriate health professional, public authority or domestic violence support organisation. The new schedule 1 introduced a new definition of “protective injunction”, for the purposes of the evidence requirements in regulations 33(2) and 24(2) (supporting documents in relation to domestic violence and protection of children).

The amended regulation 34 removed the time limit of 24 months for certain types of evidence of child abuse or risk of child abuse. Regulation 42(1)(k) was also amended to widen the Director’s power to withdraw a determination.

It would now include circumstances where the evidence:

- submitted with the application was a court order that has subsequently been set aside;
 - was in the form of a letter from a domestic violence support organisation or housing officer and a public authority subsequently confirms it is satisfied there was no domestic violence.
- The new schedules 1 and 2 describe the forms of evidence referred to within regulations 33 and 34. The amendments came into force on 8 January 2018.
 - The Criminal Legal Aid (Standard Crime Contract) (Amendment) Regulations 2017 amended the Criminal Legal Aid (General) Regulations 2013, the Criminal Legal Aid (Remuneration) Regulations 2013 (“the Remuneration Regulations”) and the Criminal Legal Aid (Financial Resources) Regulations 2013. All of the above regulations were amended to reflect the replacement of the 2010 Standard Crime Contract with the 2017 Standard Crime Contract on 1 April 2017, which governs the contractual relationship between providers of criminal legal aid services and the Lord Chancellor.

Additionally, regulation 9 of the Remuneration Regulations provides that where representation is provided in connection with proceedings in the Crown Court, providers of legal aid services must not accept payment for work done in connection with those proceedings from sources other than the Lord Chancellor. This provision was extended to cover payment from other sources to work done in connection with proceedings in the Magistrates' Court.

There was also an existing provision that the Lord Chancellor may designate certain proceedings to be criminal proceedings for the purposes of the LASPO Act. Payment for work done in connection with proceedings that are designated criminal proceedings were subject to an upper payment limit where the work related to proceedings in the Crown Court. These amendments extend this provision to work relating to proceedings in the High Court, County Court or Family Court.

Chapter 1 of Part 4 of the Policing and Crime Act 2017, when commenced, will introduce new proceedings relating to police bail. Amendments to the Remuneration Regulations have been made to make provisions for payment for work done in connection with such proceedings. The above amendments came into force on 1 April 2017.

- The Criminal Legal Aid (Remuneration) (Amendment) Regulations 2017 amended the Criminal Legal Aid (Remuneration) Regulations 2013 which provide for the remuneration of advice, assistance and representation for Criminal Legal Aid. Schedule 2 of the regulations which contains the Litigators' Graduated Fee Scheme governs the fees payable to providers of criminal litigation services in the Crown Court. Litigators are paid a single fee, known as a graduated fee, for dealing with a criminal legal aid case. This fee is calculated by reference to the number of pages served by the prosecution as evidence (Pages of Prosecution Evidence or "PPE"), subject to a cut-off threshold. If the PPE exceeds the threshold, the Remuneration Regulations provided that a claim may be made for "special preparation" which is an additional fee based on reasonable time taken to consider the evidence exceeding the threshold. The amendments to these regulations reduced the cut-off threshold from 10,000 to 6,000 PPE. The above amendments came into force on 1 December 2017.
- The Criminal Legal Aid (Amendment) Regulations 2017 amended the Criminal Legal Aid (General) Regulations 2013 ("General Regulations"), the Criminal Legal Aid (Financial Resources) Regulations 2013 ("Financial Resources Regulations") and the Criminal Legal Aid (Remuneration) Regulations 2013

("Remuneration Regulations").

The amendments to these regulations expand the scope of criminal legal aid to include:

- i. advice and assistance regarding reviews of a prisoner's classification as a Category A Prisoner (being a prisoner whose escape would be highly dangerous to the public, the police or national security and for whom the aim is to make escape impossible);
- ii. advice and assistance regarding directions as to a prisoner's placement in a close supervision centre of a prison;
- iii. advice and assistance regarding directions as to a prisoner's placement in a separation centre within a prison; and
- iv. all proceedings before the Parole Board.

Regulation 12 of the General Regulations was also amended. This regulation sets out the prescribed conditions that must be met before advice and assistance may be made available to an individual for criminal proceedings. The amendments expanded the prescribed conditions in relation to an individual's sentence. They also expanded the prescribed conditions to include all proceedings before the Parole Board.

Regulation 7 of the Financial Resources Regulations sets out the categories of work for which the Director must make a determination that an individual's financial resources are such that they are eligible for advocacy assistance (provided that certain additional criteria are met). These amendments expand those circumstances to include reviews of an individual's classification as a Category A prisoner.

Schedule 4 of the Remuneration Regulations has also been amended which provides the rate to be paid for advice and assistance for criminal proceedings. The amendments were to provide appropriate fees for advocacy assistance for matters regarding an individual's sentence. The above amendments came into force on 21 February 2018.

12. Although the Lord Chancellor has no role in relation to individual funding decisions, an annual meeting is also arranged to discuss the carrying out of the functions of the office. This is to include discussion of any themes that have emerged relating to the Director's role, the legal aid scheme and lessons learned. This year the meeting took place on 16 May 2018. The topics referred to in this report were discussed.

Decision-Making Process and Structure

13. Decisions on cases and the functions of the Director are delegated to the LAA. Specifically, these determinations are made by Case Management, a team of around 891 staff. This team is divided into two groups, each managed by a Deputy Director:
- Civil and Crime Case Management
 - Exceptional and Complex Cases Team ("ECCT"). This group combines the former High Cost Civil Team, Exceptional Case Funding Team, and National Immigration and Asylum Team.
14. Civil Case Management includes Legal Merits, Family High Cost Cases, Means, Civil Finance, Records Management and Central Business Support teams as well as a dedicated Customer Services Team. Throughout the year the LAA has worked collectively to streamline processes internally and externally to improve turnaround time. The LAA has worked closely with providers and the representative bodies to identify key areas to work on, offering provider visits, workshops and involving them in continuous improvement events. Those measures have contributed to ensuring that 100% of applications for criminal legal aid were processed in 2 working days, 97% of applications for civil legal aid were processed in 15 working days (except in the most complex cases) and 98% of complete, accurate bills were paid in 20 working days.
- All operational Key Performance Indicator targets were met in 2017-18.
15. Within Crime Case Management, the process for submitting Proceeds of Crime Act litigator and advocate claims has been fully digitalised since February 2018, resulting in faster and more efficient payment for providers. Crime Case Management includes the Criminal Cases Unit which deals with high cost criminal cases, special preparation, the assessment of Proceeds of Crime Act claims and claims out of Central Funds.
16. The ECCT deals with the more costly and complex civil cases funded by the LAA as well as immigration cases, except those funded via controlled work. Many applications received by the Director and referred to the ECCT have a high political profile. For example, it was this team that dealt with the application for representation at the inquest for the families of a number of victims killed in the Birmingham Pub Bombings of 1974. This team has also overseen the applications for legal aid connected to the Grenfell fire disaster.

17. Exceptional Cases Funding ("ECF") now falls under the ECCT. The ECF scheme covers all applications outside the scope of ordinary civil legal aid funding under the LASPO Act. As set out in section 10 of the LASPO Act, ECF applies where the failure to provide legal aid would be a breach, or where there is a substantial risk of a breach, of:
 - a. the individual's Convention rights (within the meaning of the Human Rights Act 1998); or
 - b. any rights of the individual to the provision of legal services relating to enforceable EU rights.
18. ECF applications must be considered on an individual basis, in light of the facts and the statutory requirements for funding, and having regard to the guidance on ECF and case law. Applications can be, and sometimes are, made directly by applicants.
19. To ensure that legal aid legislation and guidance issued by the Lord Chancellor are applied in a consistent manner, advice and training have continued to be provided to all LAA caseworkers, tailored according to the particular role of each casework team.
20. Legal advice for the Director is provided by the Central Legal Team staffed by lawyers employed by the Government Legal Department, but assigned to and co-located within the LAA. The team act solely for the LAA when exercising the functions of the Director or the operational legal aid functions of the Lord Chancellor.
21. Decisions on individual applications are delegated to caseworkers with the opportunity for escalation as necessary. This includes a referral mechanism to the Central Legal Team for high profile matters which include cases proceeding to the Court of Appeal or the Supreme Court. This process of escalation and referral provides the Director with the requisite assurance that any decisions made are lawful.

Appeals and Reviews

22. All determinations made by the Director are subject to a right of internal review where requested. Furthermore, unless the application is for ECF or the Director determines that the case is not within the scope of the LASPO Act there is a further right of appeal to an Independent Funding Adjudicator ("IFA"), a solicitor or barrister from private practice. IFAs are members of a Funding and Costs Appeals Review Panel ("FCARP"). Panel members are not employees of the LAA and act independently. Statistics on numbers and outcomes of appeals are included in each annual edition of the Legal Aid Statistics bulletin, with the figures for the year ending March 2018 due to be published on 28 June 2018.

23. The decision of the IFA on certain issues is binding on the Director. These are: any assessment of the prospects of success of a case, whether a matter has overwhelming importance to the client, the cost-benefit ratio of the proceedings and discharge or revocation on the basis of a client's behaviour. Other issues are referred back to the Director for reconsideration. Some panel members in their roles as Independent Costs Assessors ("ICAs") consider appeals against the provisional assessment of costs by the LAA's staff.
24. As at 31 March 2018 the FCARP comprised 100 members who consider the majority of appeals alone. Appeals are allocated according to the specialist areas of law declared by each panel member
25. There is a sub-panel, the Special Controls Review Panel ("SCRIP") which is formed of three specialist members of the FCARP who consider appeals relating to certain high cost cases and other more complex cases. Within the FCARP there are 20 SCRIP members.
26. If a client is dissatisfied with the final determination following a review and/or appeal then the only recourse left is litigation.

Litigation

27. The Director's decision-making can be challenged by a claim for judicial review. Of note this year were the challenges to the statutory charge, a long-standing feature of the legal aid scheme. The charge arises where a legally aided person recovers or preserves money or property in proceedings but not all their legal aid costs are paid by the other side. In these circumstances, the money or property will be subject to the statutory charge to recover those costs. This is provided for by section 25 of the LASPO Act.
28. In the case of *Permila Tirkey v Director of Legal Aid Casework and the Lord Chancellor* [2017] EWHC 3403 (Admin) a victim of trafficking sought to challenge the operation of the statutory charge on damages that she had recovered in legally aided employment tribunal proceedings. The total award made to the claimant in those proceedings was £266,536.14. The sum recovered by way of enforcement of that award was £35,702.80. The LAA exercised its statutory charge over that sum which meant that the claimant did not recover any of her damages for herself. The judgment in the claimant's challenge confirmed that no article in the European Convention of Human Rights and no provision of EU law renders the statutory charge as it was applied to the claimant, unlawful. The judgment noted that the claimant's circumstances were unfortunate,

but it did not accept the claimant's arguments that she should be able to recover at least a substantial proportion of the money that was subject to the charge.

The judgment confirmed that the statutory charge is a "bright line" provision which applied to the claimant's case, notwithstanding her status as a victim of trafficking. There was nothing unusual or exceptional about that status which required that the statutory test which created the statutory charge would not apply to the damages that she had recovered.

29. The case of R (on the application of Faulkner) v Director of Legal Aid Casework [2016] EWHC 717 was a pre-LASPO Act case where the claimant wanted the Director to exercise discretion and waive the statutory charge. The claimant submitted that the LAA's decision had been based on a flawed interpretation of regulation 47 of the Community Legal Service (Financial) Regulations 2000, that his case had been a test case [even though it had not been funded specifically by the Legal Services Commission (the predecessor to the LAA) in preference to cases concerning other claimants]. As a result, the LAA's decision was contrary to the Human Rights Act 1998 ("HRA") as it would leave him without redress for the violation of his Article 5 rights. The claimant was unsuccessful in the Administrative Court. However, he sought and obtained permission to appeal at a hearing in the

Court of Appeal on 9 November 2017. This appeal is being heard by the Court of Appeal on 4 July 2018. The Director's position was that as Mr Faulkner did not ask for the discretion under regulation 47 to be exercised until after his case had concluded, the conditions under regulation 47 could not be met, because at no point had Mr Faulkner's case been chosen to be funded over other cases.

30. A continued source of enquiry is the potential application of the statutory charge to awards of damages under the HRA made in favour of children and parents in family public law proceedings, as a result of failures by local authorities or other public bodies coming to light within or at the same time as those proceedings. The LAA, acting on behalf of the Lord Chancellor, has had direct involvement in two cases involving HRA damages claims associated with care proceedings [PW & Ors v Luton Borough Council [2017] EWHC 3028 (Fam)] and a further case which is still ongoing. The position concerning the statutory charge in such cases has been significantly clarified. From the Director's standpoint, a key issue is that a legal aid certificate granted solely for care proceedings will not cover any work carried out with a view to bringing a HRA damages claim. This has been supported by the Family Court in the case of H v Northamptonshire County Council and Legal Aid Agency [2017] EWHC 282 (Fam), in which Keehan J stated: "... where it is

necessary for a party to issue a formal HRA claim, proceedings should be issued separately from the care proceedings and a separate public funding certificate should be sought from the LAA in respect of the matter". If a HRA claim is intended to be brought under legal aid, a separate application will be necessary.

31. Last year, an issue arose in proceedings before the Court of Protection in relation to the scope of proceedings under section 21A of the Mental Capacity Act 2005, which provides a mechanism for review of detention. Legal aid to challenge detention under section 21A is non-means tested. On 27 September 2016, Charles J in *Lindsey Briggs -and- (1) Paul Briggs (By his litigation friend, the Official Solicitor), (2) The Walton Centre NHS Foundation Trust (3) Wirral Clinical Commissioning Group (4) Ministry of Justice (5) Department of Health (6) The Director of Legal Aid Casework [2016] EW COP 48* joined the LAA, MoJ and the Department of Health ("DH") as parties to proceedings said to have been brought under section 21A of the Mental Capacity Act (to challenge a standard authorisation, depriving liberty). This was to test whether non-means tested legal aid available to applicants and their representatives to bring such a challenge could extend to cover other issues, such as the treatment being given to a person who is under a standard authorisation. At a preliminary hearing, Charles J held that the proceedings were properly brought under section 21A with

the consequence that the court could consider the medical treatment issue in addition within the section 21A application and, importantly, under the cover of a non-means certificate. The effect of this was that Mrs Briggs could use non-means tested legal aid to challenge the treatment that Mr Briggs was receiving. The LAA's view was that such an application could be funded under the legal aid scheme, but subject to the applicant being financially eligible. Whilst Mrs Briggs did not provide information relating to her financial resources, it was generally acknowledged by her legal team that if she were to take the means test, she would not have been eligible.

32. The MoJ and the LAA successfully appealed that decision to the Court of Appeal and judgment was handed down on 31 July 2017 [see (1) *Director of Legal Aid Casework (2) Secretaries of State for Health and Justice (3) Official Solicitor -and- Briggs [2017] EWCA Civ 1169*]. The Court of Appeal gave a detailed judgment which confirmed (at paragraph 110) that section 21A of the Mental Capacity Act was concerned with whether deprivation of liberty is itself in the patient's best interests and Charles J was in error in concluding that it is appropriate to make an application under section 21A where the central issue is one of continued life sustaining treatment. The effect of the appeal is to confirm that non-means tested legal aid cannot be used to challenge matters relating to medical treatment.

Accountability

33. There has been no change to the manner in which the Director's functions continue to be open to public scrutiny. The mechanisms in place allowing the LAA's work to be scrutinised and interested parties to hold the Director to account are explained below.

Parliamentary questions and freedom of information requests

34. Members of Parliament and Peers can table parliamentary questions asking about the work carried out by the Director in respect of cases or individuals. Similarly, the public can also submit requests for information held by the LAA under the Freedom of Information Act 2000.
35. In 2017-18 the LAA received 11 requests for information under the Freedom of Information Act and 7 parliamentary questions relating to the Director of Legal Aid Casework specifically. The majority related to ECF and individual case funding.
36. Information about an individual legal aid client is likely to be personal data and can only be released where the case meets the criteria set out within the Data Protection Act 1998.

Complaints

37. The LAA thoroughly investigates every complaint it receives, using a two-tier complaints procedure. The initial complaint gives the LAA the chance to review the way the matter was handled at a local level and put the situation right if possible. If a complainant is not content with the initial response, they can escalate their complaint and request a further review. If the complainant remains dissatisfied with the response they have the right to refer their complaint to the Parliamentary and Health Service Ombudsman via their local MP.
38. The LAA does not separately record complaints which relate specifically to the remit of the Director. However, a significant proportion of all complaints the LAA receives relate to individual cases and casework decisions.

Statistics

39. The LAA deals with applications for legal aid across various categories of law. The LAA publishes national statistics on numbers of applications within the Legal Aid Statistics bulletin. This is published every quarter, and statistics covering the period to the end of March 2018 will be published online on 28 June 2018². In particular, statistics on the number of grants made in relation to the domestic violence evidence requirements referred to earlier are included within the Legal Aid Statistics bulletin.

Equality and Diversity

40. The LAA is subject to the public sector equality duty under section 149(1) of the Equality Act 2010.

41. During 2017-18 the LAA continued to improve the knowledge and awareness of LAA staff about equality and diversity issues. All staff are required to complete Civil Service Learning courses on Equality and Diversity Essentials and Unconscious Bias. All line managers are also expected to complete an additional course on Disability Awareness.

42. The LAA requests that applicants for legal aid provide us with some personal equality information. This information enables the LAA to understand the needs of potential legal aid applicants better and compile statistics on their diversity.

43. The Director has reviewed the equal opportunity information that recipients of legal aid provided during the first three quarters of 2017-18 to monitor the extent to which the LAA continues to cater for the diverse population of England and Wales. The LAA will publish statistics relating to the diversity of legal aid clients over the period 2017-18 as part of the Legal Aid Statistics bulletin published on 28 June 2018, and the Director will continue to review this information over the coming year.

² See <https://www.gov.uk/government/collections/legal-aid-statistics>

Conclusion

44. The role of the Director of Legal Aid Casework is an important one and the LAA continues to demonstrate its capabilities in responding to legislative and regulatory changes.
45. The Director is pleased to note that the LAA is also continuing to improve processes and turnaround times for decision-making on individual cases. Decision-making is delegated to Case Management and inevitably attracts detailed scrutiny. There are always challenges to work through.
46. In 2017 this included multiple challenges to the use of the statutory charge. Some of these are continuing and are outlined above.
47. Operationally, the LAA is continuing to build on past successes and our commitment to digitalisation is paying dividends. It is vital to the improvements that are being made to our case management processes. These improvements enable us to continue to exceed challenging operational processing targets.
48. A copy of this report has been sent to the Lord Chancellor in accordance with section 7(3) of the LASPO Act. The Lord Chancellor will lay a copy of the report before Parliament.

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