



Ministry of Defence

Ministry of Defence Police Committee

Annual Report 2017-18

Chair of the MOD Police Committee

24 July 2018

MOD POLICE COMMITTEE ANNUAL REPORT 2017-18

INTRODUCTION

The main purpose of the MOD Police is to provide specialist armed policing to protect the nation's key Defence and national infrastructure sites.

The MOD Police Act (MDPA) 1987 requires the Secretary of State for Defence to appoint a committee to advise him on matters relating to the MOD Police (MDP). The Act requires the MOD Police Committee to provide the Secretary of State with an assurance that the MDP is exercising its policing powers and authority lawfully and impartially, and is meeting the standards required of a UK police force. Since 1 April 2013, the Committee is also required to give advice on the efficiency, effectiveness and performance of the Force to the senior official responsible for the MDP. Our terms of reference require us to present an annual report to discharge this responsibility.

FOREWORD BY THE CHAIR OF THE MOD POLICE COMMITTEE

This is my first report to the Secretary of State since being appointed as the new independent Chair with effect from 1 October 2017. At that point, the Force was recovering from the sad and untimely death of the Chief Constable, Alf Hitchcock. Last year's report carried a fitting tribute to Alf's astute leadership, boundless energy and the compelling contribution that he had made to the broader police community over an extended period. With the passage of time, it is even more evident that his vision for the future MDP is highly relevant to today's testing security environment and entirely pragmatic in the demands it makes on people and financial resources. This report records the continuing transformation process.

I also owe much to my predecessor, David Riddle, for the firm foundations that he left in place and for the positive reputation of the committee in terms of its professional expertise and its demonstrable independence. Providing independent assurance on the efficiency, effectiveness and performance of the MDP is a complex task, particularly given the additional roles now undertaken by the Force. The unpredicted loss of the Firearms Training Licence which was revoked by the College of Policing in July 2017 bears testament to the challenges which the Committee faced. As a result, alongside an external peer review, I undertook an early assessment of the processes and capacity of the Committee to meet this important assurance requirement. The findings are outlined in this report.

In terms of the MDP's performance in 2017-18, the loss of the Firearms Training Licence resulted in damage to the MDP's reputation across the Department. However, the impact was limited given that the Force retained the required levels of firearms-qualified officers and successfully met the requirements of two Operation Temperer deployments.

Last year's report to your predecessor highlighted the degree of transformation that the MDP was undergoing and the challenges that lay ahead. Some 12 months later, it is clear the implementation of the Operational Policing Model is now well-embedded, and the complement reset is in the process of being implemented: both aspects are now absorbed as business as usual. More strategically, while there are no significant developments to report, we stand by to assist the Home Office led Infrastructure Policing Review, which remains a Government manifesto commitment.

On personnel aspects, as ever, a period of transformation takes time to work through to the coal-face. Recruitment during 2017-18 at 226 sits marginally below outflow but this obscures the distorted demographics of the Force with some 46% of officers over the age of 50. Whilst this cohort represents an enormous well of experience, it does become problematic for individuals of that age to maintain both the medical standards and physical fitness requirements associated with Authorised Firearms Officers. The Chief Officer Group is actively considering how to deal with this challenge.

A further challenge arises from the lack of diversity of the Force as it stands and in the nature of potential recruits. Currently, only 11% are female and 2% are from BAME communities. Changes to recruiting methods are beginning to bear fruit but these are early days and the improved numbers are marginal. The active consideration of regional recruiting and employment (described later in this report) should provide at least part of the solution.

In terms of finance, the MDP came in on budget but for imposed changes to conditions of employment (pensions and holiday pay). However, because of the number of officers deemed unqualified to bear firearms, there is significant reliance on overtime which represented an in-year opportunity cost of £12 million within a budget of some £130 million. The Committee is concerned at this situation which is being addressed by the Chief Officer Group.

Finally, the Committee welcomes the Chief Operating Officer's review of the governance of the Enabling Defence Organisations (of which the MDP is one) as part of the Modernising Defence Programme. This work has been adjusted to cohere with the action plan arising from an independent review following the loss of the Firearms Training Licence which proposed a review of the capacity of the Police Committee to be able to provide the level of assurance required of it. For our part, the Committee is clear that it is under-resourced given the increasing complexity associated with a specialist, fully-armed police force.

In closing, I would encourage the Secretary of State to include in any visits to the front-line, especially those with a nuclear role, a segment of the programme to bring him into contact with the MDP and their commanders: you will be impressed by what you see.

Assurance Opinion

With the re-instatement of the Firearms Training Licence by the College of Policing in May 2018 and based on the Committee's work throughout 2017-18 (Annex A), we can give assurance to the Secretary of State that the MDP is delivering policing services in accordance with the MDPA 1987, is exercising policing powers lawfully, responsibly and proportionately, and that the MDP meets the standards of a UK police force.

Sir Brian Burridge

Chair of the MOD Police Committee

BACKGROUND

Status of the MOD Police Committee

1. The MOD Police Committee is a statutory requirement of the MOD Police Act 1987. The Secretary of State for Defence appoints the members. The Terms of Reference for the Committee and the membership of the Committee is available at: <https://www.gov.uk/government/publications/ministry-of-defence-police-committee-terms-of-reference> and

<https://www.gov.uk/government/publications/mod-police-committee-independent-members-and-guidance-documents>.

2. The operating costs of the committee including the remuneration and expenses of the independent members of the Committee are shown at Annex B.

Assessing the Efficiency and Effectiveness of the MDP

3. It is the role of the Committee to report to the MOD's senior official responsible for the MDP on the Force's efficiency and effectiveness. This is addressed through a quarterly Sub-Committee for Performance and Risk Management.

4. The Sub-Committee has adopted a revised approach to the identification and management of risk. The first step was to generate coherence between the MOD's Statement of Requirement for the MOD Police, the MDP's strategic objectives as articulated in the Policing Plan and the Strategic Risk Register.

5. Secondly, given that 90% of the cost of the MDP is in people and 86% are on the front-line, the Sub-Committee saw the need to take a more systematic approach to the assurance of the lifecycle requirements of providing an MDP force of the right size, with the correct qualifications, at the right level of readiness and with the requisite level of experience matched to rank. To that end, the Committee devised a dashboard performance format by which to assess the cumulative risk and end-to-end robustness of the lifecycle pipeline. This provides the ability to identify trends that need early Command Officer Group intervention.

6. Thirdly, the MDP Risk Register has been re-crafted, with assistance from the MOD's Chief Risk Officer, against a newly agreed set of strategic objectives and to conform with the MOD's Risk Management Policy (JSP892). This allows the Committee to focus on those aspects where the controls and mitigation action point to an unacceptably high residual risk.

7. This approach will shape the Committee's Work Programme for 2018-19 and guide our process to provide future assurance to the Defence Secretary.

Defence Internal Audit (DIA) has also engaged with the Committee and offered to assist where there is capacity available. In order to support the accompanying change to risk analysis and verification, we believe there is a case for additional resources to perform our assurance role for 2018-19 going forward.

STRATEGIC OUTPUTS

Performance on Key Objectives for 2017-18

8. The MDP's Key Objectives in the 2017-18 Policing Plan were all met to an acceptable standard except for that related to the reinstatement of the Firearms Training Licence (Strategic Objective 1) but which was achieved early in Q1/2018-19. In addition, in terms of optimising value for money (Strategic Objective 2), the high level of officers unable to carry firearms required significant spend on overtime. Against that backdrop, all customers were satisfied with the level of service and the mitigation measures in place to address any personnel shortfalls.

9. In terms of finance more broadly, the full-year outturn was a £4.7 million overspend against a control total of £130.4 million which was abated by savings measures of £12.8M: the structural element of the overspend arose from changes in personnel terms and conditions. However, overtime expenditure amounted to £12 million: this outcome again underpins the Sub-Committee's intent to address the level of non-effective officers. At £138M, the expected FY 2018/19 control total is more realistic but still does not include the resource allocation for all customer requirements: the assurance that this figure will remain stable through the coming year is welcomed. In addition, the decision to delay disaggregation of funding to customers will allow a period of consolidation during which to bear-down on some of the MDP's structural costs. Longer-term programme risks remain from the HQ relocation project and the eventual introduction of the Emergency Services Network vice Airwave as the Force's primary voice communications system.

OPERATIONAL READINESS ISSUES

Firearms Training Licence

10. The year has been dominated by the Force's work to regain the Firearms Training Licence which was revoked by the College of Policing in July 17. The Chief Constable was formally notified of the College of Policing's decision to fully reinstate the licence with immediate effect on 4 May 18. The letter justifiably recognised the 'remarkable progress' in addressing the previously identified issues, commenting favourably on the commitment of both the senior leadership and the command chain towards achieving high standards in the standardisation of training and related operating procedures.

11. Fitness testing levels and the operational deployment of Taser remain to be addressed and plans are underway. However, the Force should not relax

their efforts to the extent that the firearms training licence could be placed in jeopardy in the future. To that end, the independent review of firearms training conducted by Chief Constable Simpson from the Dorset Constabulary provides a valuable action plan by which to guard against any decline in standards. A key aspect of sustained resilience in firearms training is the provision of 31 additional National Firearms Instructors. The Senior Management Team will need to make a clear, decisive and timely decision on how to fund these posts.

Deployment

12. The suspension of the MDP's Firearms Training Licence did not impair the ability of MDP officers to carry firearms lawfully in the course of their duties. During May and November 2017, the MDP successfully deployed considerable numbers of armed officers under Operation Temperer in response to requests for support from a number of Home Office forces. The MDP will continue to support the wider UK policing response to counter the threat from terrorism by meeting the agreed commitments to the national armed policing strategic reserve and Operation Temperer.

Force Strength

13. On 31 March 2018 the complement of the MOD Police was 2,733 officers, although the current actual strength of the Force is 2,542. The strength of the Force has been consistent over the last few years with a small net increase each year after accounting for recruitment and exits. Since 2015, the MDP has mitigated the delta between complement and strength by implementing a new operational policing model and by agreeing temporarily adjusted levels of service delivery, or overtime working, with local customers. The Chief Constable has carried out a review to consider a re-set of the MDP complement at the current strength where this is within Departmental security risk appetite. This will effectively regularise the adjustments to the service delivery that have been in place since November 2015 and implementation will commence from 1 April 2018. In parallel, the migration towards a centrally rostered, uniform 12-hour shift pattern is the subject of on-going consultation.

Continuous Professional Training

14. The suspension of the MDP's Firearms Training Licence in July 2017 arose from a systemic failure in human processes involved in maintaining the integrity of firearms training. It was understandable that the College of Policing wanted to see a sustained improvement based on a change of culture and renewed robustness in the training regime before re-considering the position. However, during our station visits, a continual theme has been the low level of developmental training due both to the lack of resources and because of the priority afforded to the necessary training for the re-instatement of the Firearms Training Licence.

15. In terms of leadership development, in 2017, the Force introduced the framework outlined in the Civil Service Leadership Statement (ICE – Inspiring-

Confident-Empowering) but the degree to which it has become embedded in this short time is uncertain. The Committee will test this aspect during station visits in the coming year. Leadership courses are provided for newly promoted officers up to Chief Inspector. In addition, the Chief Officer team attend the Defence Academy strategic leadership courses but there is an identified gap at the Superintendent and Chief Superintendent level. This aspect will be addressed by the HQ team in the coming year in concert with a validation of the broader in-house leadership training and development.

Command Chain Capability

16. The Committee has for some time raised concerns about the number of front-line officers in temporary positions or holding acting rank in the Force. For example, the results of a recent Sergeant promotion examination (which is based on the College of Policing framework) were disappointing with only a 20% success rate. This appears to be due to the examinations being based on a high percentage of material that is generally not relevant to the duties of an MDP officer. The Senior Management Team have agreed to re-visit this during 2018-19.

HQ re-location

17. The future site for the Force HQ remains unresolved but there is now acceptance that a single-site solution to replace Wethersfield in its entirety is unlikely. Positive progress is being made in investigating a federated training solution to make best use of existing infrastructure and facilities elsewhere that may become available and thus reduce the extent of new-build and hence capital cost. In addition, there is recognition that some non-HQ functions at Wethersfield do not require co-location with MDP HQ. However, the uncertainty over the timescale of the move is unwelcome given the poor state of the Wethersfield infrastructure and the impact on the personal plans of individuals. For example, the inadequacy of single-living accommodation acts as a disincentive to attendance on training courses. The site is also slipping further behind the minimum maintenance curve. Without early resolution, the rising cost of ownership of the site to the MDP budget will become a problem.

Emergency Mobile Services Communications Programme

18. The Emergency Mobile Services (to replace Airwave radio) is a Home Office project, and therefore few of the levers are in MOD's hands but the risk to operational capability is a concern. Funding has been deferred until the ABC 19 planning-round but the cost and timescales are not clear, coverage in remote locations remains uncertain and the extension of Airwave is not straightforward in terms of managing obsolescence. These cumulative risk factors have been highlighted to the Home Office and the project will be the subject of specific assurance monitoring.

PERSONNEL ISSUES

Recruitment

19. During 2017-18, the MDP recruited 226 officers against a target of 240. Over the same period 220 officers left the MDP, resulting in a net increase of 6 officers.

20. Of those officers who left the MDP, 68% were in of the age bracket of 50 and above: exit at this demographic point is to be expected. In addition, 60 leavers (27%) had completed 2 years' service or less. The Force's exit survey data (based on 64 inputs) shows that at least 27 officers (15%) left to join another police force or government department, citing lack of job satisfaction or a feeling being under-valued. Given the existing age demographics of the MDP and the current attrition rate, annual recruitment of over 200 officers will be a reality for some years to come. In particular, there are challenges for those in the older age bracket in meeting mandatory fitness requirements to meet the College of Policing standards.

21. The Committee recognises that the risk of this outflow continuing needs to be addressed by more realistic recruiting strategies potentially offering both regionally-based training and employment. Equally, there is a need for clarity on potential career development to manage the expectations of new entrants. This, in turn, would require a training regime bespoke to the MDP task rather than that designed by the College of Policing which is aimed at meeting the fully qualified police officer status required by Home Office forces. This approach would have implications both for the MDP operating principle of mirroring College of Policing standards and interoperability as well as the career structure of the MDP.

Recruit Training

22. The move from the current HQ at Wethersfield provides the MDP with an opportunity to look at recruit training in a more devolved way. The direction of travel now appears to be an acceptance that a multi-site solution is the only viable option including a federated training proposal which takes account of optimum recruiting geography, the availability of firearms training ranges and the potential sharing of facilities with Home Office police forces.

Diversity and Inclusion

23. Creating a diverse workforce remains a problem for the MDP with much effort being applied to addressing the issue. During 2017-18, MDP recruitment included 12.3% women and 2.6% from Black, Asian and Minority Ethnic (BAME) backgrounds.

24. It is disappointing that the recruitment diversity profile remains stubbornly white and male. This has a fundamental impact on other elements of the Diversity and Inclusion Programme in the Force, for instance in training, promotion and in changing culture. The MDP has now started to use social

media as a recruitment tool, which is showing some early encouraging signs on BAME recruits - the recruitment pool now includes 696 candidates of which 11.4% are women and 4.6% are from BAME backgrounds. More work is however needed to improve the number of women and BAME recruits.

25. A review of the recruitment process during the year identified that 15% of police vetting refusals related to BAME candidates although they accounted for only 6% of the vetting cases. The MDP is doing more work to understand why this should be the case to ensure appropriate support can be given to future BAME candidates.

26. The MDP is now implementing 'with consequence' fitness tests and any disproportionate impact in terms of age and gender is being closely monitored and actions are being developed to support officers through the process. This, together with tighter management control over absences and annual medicals, is also having an impact on attrition rates. The resulting increased recruiting requirements will continue to provide significant opportunities to improve the diversity of the Force which should not be wasted.

Fitness Testing

27. In order to retain the College of Policing licence for Firearms Training, the MDP will need to move towards aligning fitness standards across armed policing in the UK by 2020 at the College standard of 7.6¹. This is greater than the current MDP standard of 5.7 although new MDP recruits are tested to the higher 7.6 standard.

28. Progress over 2017-18 is reported at **Table 1**. This demonstrates that fitness testing is now firmly embedded within the MDP. More than 2,300 MDP officers are currently available to participate in fitness testing: 98% of these have met the required standard. The Force will continue to provide support to all officers who require extra help in order to reach the required standard.

Long Term Sickness

29. In 2014, the MDP set itself a target to reduce the total number of officers who were classified as either Long Term Sick or not capable of carrying a firearm. This cohort represents a reduction in Force capacity to meet customer requirements and places an additional load on their colleagues through the need for overtime working. The target was to reduce the size of this cohort to a level comparable with the wider UK policing service. This was always an ambitious target given that the majority of MDP officers are specialised, firearms officers making it a more challenging proposition than for other forces where such a specialisation is only a small proportion of the total complement.

30. The latest data to 31 March 2018 is at **Table 2**. This indicates that 15.4% of PCs and Sgts on frontline duties are currently assessed as not being capable

¹ Shuttle-run beep test as accredited by the Institute of Naval Medicine.

to carry a firearm or on Long Term Sick leave. The main ailments are categorised as "Muscle and Bone" (28%), Anxiety, Depression and Stress (22.5%) and Fractures, sprains and strains (14%). The increase in temporary non-capability was anticipated because of the introduction of 'with consequence' fitness testing on 1 June 2017 and is predicted to worsen over the next couple of years.

The independent members recognise that this is an unsustainable position and will monitor this closely during 2018-19. In addition, the senior team has been asked to monitor any trends in stress-related absences resulting from the impact of high levels of overtime.

Pension Age

31. The Committee has previously expressed disappointment at the Treasury's decision to decline the MOD's proposal for an Enhanced Effective Pension Age of 60 for MDP officers. This outcome continues to be a real concern for officers evidenced by our engagement with them during our station visits. In a Force where 46% of the officers are aged over 50 and given the fitness levels they are required to maintain plus the weight of personal equipment that they are required to carry, this position is not tenable. The Committee would therefore wish to see this policy re-visited at an appropriate stage in the future.

Professional Standards

32. MDP officers adhere to the standards of professional behaviour set by the Home Office and the College of Policing Code of Ethics.

- **Complaints:** Given there are some 2,000 officers on the frontline, the number of complaints against the MDP from members of the public are not significant and continue to reflect this MDP's limited public contact.
- **Conduct:** Neglect or failure in duty which totals 91 cases appears to be a concern. This includes:

<i>Speeding</i>	<i>70</i>
<i>Traffic (non-speeding)</i>	<i>7</i>
<i>Sexual/indecency</i>	<i>5</i>
<i>Aggression</i>	<i>3</i>
<i>General Conduct</i>	<i>2</i>
<i>Neglect of duties</i>	<i>1</i>
<i>False Statement</i>	<i>1</i>
<i>Domestic</i>	<i>1</i>
<i>Data Protection</i>	<i>1</i>
<i>TOTAL</i>	<i>91</i>

33. Of note, some Home Office Police forces do not record speeding as Discreditable Conduct and indeed some do not record it as misconduct at all. If these were discounted by the MDP the total of discreditable conduct cases

would be 21. The complaints and conduct statistics for 2017-18 are provided at **Table 3**.

Use of Force

34. Use of force by MDP officers is reported to Police Committee meetings. Since 1 April 17, the MDP complies with the National Police Chiefs' Council 's requirement for all police forces to record and publish data on the use of force by officers. <https://www.gov.uk/government/collections/ministry-of-defence-police-use-of-force-statistics>

TABLE 1

FITNESS TESTING

Fitness Levels	31 Mar 17	31 Mar 18
No of officers who have passed 7.6	365 (14%)	949 (37%)
No of officers who have passed 5.7	1,307 (51%)	1,358 (54%)
No of officers who have not passed 5.7 (or lapsed)	77 (3%)	61 (2%)
No of officers prevented from taking fitness test for health reasons	126 (5%)	see below
No of officers to have taken the test*	1,723 (67%)	2,368 (93%)
No of officers still to take the test for the following reasons:	645 (25%)	185 (7%)
a) Failure resulting in informal action plan to work towards required level;		
b) Within the occupational health system		
c) Within formal capability or performance process		
d) In a reasonably adjusted post and exempt from test		

* Force strength

at 31 Mar 17 was 2,569

at 31 Mar 18 was 2,533

TABLE 2

LONG TERM SICKNESS AND NON-CAPABLE OFFICERS

	Target Dec 15	Actual Dec 15	Mar 16	Mar 17	Mar 18
Long Term Sick (LTS) as recorded on HRMS Officers absent 28 days/more	66	79	63	60	62
Temporarily 'Non-Capable' Officers with shorter term conditions, illness, injury (<i>see footnote</i>)	50	84	81	152	303 ⁱ
Permanent 'Non-Capable' Officers with long term medical conditions	25	17	15	19	26
Total	141	180	159	231	391
% of MDP current strength	5.2%	7.1%	6.2%	8.9%	15.4%

Footnote: As from Q4 FY 2017-18 this figure records all non-effective officers rather than those simply medically non-capable officers. This will include for example new recruits during initial training,

TABLE 3

MOD POLICE – COMPLAINT & CONDUCT ALLEGATIONS RECORDED 2017 - 2018			
COMPLAINT ALLEGATION TYPE	NO	CONDUCT ALLEGATION TYPE	NO
Serious non-sexual assault	0	Honesty and Integrity	1
Sexual assault	0	Authority, Respect and Courtesy	9
Other assault	0	Equality and Diversity	1
Oppressive conduct or harassment	3	Use of Force	0
Unlawful/unnecessary arrest or detention	1	Orders and Instructions	20
Discriminatory Behaviour	1	Duties and Responsibilities	29
Irregularity in evidence/perjury	6	Confidentiality	0
Corrupt practice	0	Fitness for Duty	1
Mishandling of property	1	Discreditable Conduct	91
Breach Code A PACE (Stop & Search)	0	Challenging and Reporting Improper Conduct	2
Breach Code B PACE (Search of premises/seizure of property)	7		
Breach Code C PACE (Detention, Treatment & Questioning)	2		
Breach Code D PACE (Identification)	0		
Breach Code E PACE (Audio Recording – interviews with suspects)	0		
Multiple or unspecified breaches of PACE	1		
Other neglect or failure in duty	56		
Other irregularity in procedure	19		
Incivility, impoliteness and intolerance	10		
Traffic irregularity	1		
Other	11		
Lack of fairness and impartiality	1		

Improper disclosure of information	2		
Other sexual conduct	0		
Corrupt practice	0		
General policing standards	1		
Operational policing policies	0		
Operational management decisions	6		
Total Allegations	129		154
Total Cases	25		134

HISTORICAL STATISTICS OF COMPLAINT & CONDUCT ALLEGATIONS/CASES RECORDED					
	2015-16	2016-17		2015-16	2016-17
Complaint Allegations	26	98	Conduct Allegations	154	188
Complaint Cases	13	16	Conduct Cases	122	149

Note:

The 129 complaint allegations recorded during 2017 - 2018 originated from 29 separate complaint cases, some of which were recorded during previous reporting years

A total of 25 new complaint cases were recorded during 2017 - 2018.

The 154 conduct allegations recorded during 2017 - 2018 originated from 137 separate conduct cases, some of which were recorded during previous reporting years.

A total of 134 new conduct cases were recorded during 2017 - 2018.

**REMUNERATION AND EXPENSES OF THE INDEPENDENT MEMBERS
OF THE MOD POLICE COMMITTEE FY 2017-18**

Name	Position	Fees	Expenses	Total
<i>David Riddle</i>	<i>Chair (to 30 Sep 17)</i>	<i>7,700.00</i>	<i>477.25</i>	<i>8,177.25</i>
<i>Sir Brian Burridge</i>	<i>Chair (from 1 Oct 17)</i>	<i>8,100.00</i>	<i>805.88</i>	<i>8,905.88</i>
<i>Sir Hugh Orde</i>	<i>Police Adviser</i>	<i>7,150.00</i>	<i>430.50</i>	<i>7,580.50</i>
<i>Len Jackson</i>	<i>Independent Member</i>	<i>5,225.00</i>	<i>482.90</i>	<i>5,707.90</i>
<i>Miss Anne McMeel</i>	<i>Independent Member</i>	<i>7,150.00</i>	<i>120.00</i>	<i>7,270.00</i>
<i>Ms Moi Ali</i>	<i>Independent member (from 1 Oct 17)</i>	<i>5,225.00</i>	<i>1,677.36</i>	<i>6,902.36</i>
TOTAL		40,550.00	3,993.89	44,543.89

Other Costs	Salary	Travel & Subsistence	Total
<i>Clerk to the MOD Police Committee (75% of time)</i>	<i>44,899.43</i>	<i>120.30</i>	<i>45,019.73</i>
<i>Association of Police & Crime Commissioners (associate membership)</i>	<i>9,000.00</i>	<i>0.00</i>	<i>9,000.00</i>
TOTAL	53,899.43	120.30	54,019.73

OVERALL TOTAL: £98,543.6
