

**Perverting the course of justice
and witness intimidation
Offences guidelines
Response to consultation**

July 2023

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intimidation offences
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Contents

Foreword	3
Introduction	4
Summary of analysis and research	5
Summary of responses	6
Perverting the course of justice	
Culpability factors	8
Harm factors	9
Sentence levels	100
Aggravating factors	11
Mitigating factors	11
Witness intimidation	12
Culpability factors	12
Harm factors	13
Sentence levels	15
Aggravating and mitigating factors	16

Equality and diversity issues	17
Conclusion and next steps	20
Annex A: consultation respondents	21

Foreword



On behalf of the Sentencing Council I would like to thank all those who responded to the consultation on these guidelines. I also extend my thanks to the members of the judiciary who gave their time to participate in the research exercise undertaken to test and inform the development of the guidelines.

As with all Sentencing Council consultations, the views put forward by all respondents were carefully considered, and the range of views and expertise were of great value in informing the definitive guidelines. Because of those views, some changes have been made to the wording of a number of factors within the guidelines. The detail of those changes is set out within this document.

This set of guidelines will provide assistance to courts in sentencing these offences, in particular for perverting the course of justice, a serious offence often said to 'strike at the heart of the administration of justice', for which previously there was not a guideline.

Lord Justice William Davis
Chairman, Sentencing Council

Introduction

In March 2022 the Sentencing Council published a consultation on draft guidelines for perverting the course of justice and witness intimidation offences.

There had previously not been a sentencing guideline for perverting the course of justice, and only limited guidance for witness intimidation offences in the magistrates' court.

The Council's aim throughout has been to ensure that all sentences are proportionate to the offence committed and in relation to other offences.

The reaction to the draft guidelines was broadly positive.

The guideline will apply to all those aged 18 or over who are sentenced on or after 1 October 2023, regardless of the date of the offence.

Summary of analysis and research

Several research exercises were carried out to support the Council in developing the guidelines. Content analysis was conducted of judges' sentencing remarks for offenders sentenced for all the offences included within these guidelines. This provided valuable information on some of the key factors influencing sentencing decisions for these cases.

During the consultation stage of guideline development, small-scale qualitative research was carried out to help gauge how the guidelines might work in practice. Twenty-four interviews were conducted with Crown Court judges only, as perverting the course of justice is an indictable only offence and the majority of witness intimidation cases are tried in the Crown Court.

Because of this research, in combination with consultation responses, a number of changes were made to the wording of factors in the guidelines. Also, new factors were added, such as a new high culpability factor of 'Breach of trust or abuse of position or office' in the Perverting the course of justice guideline. In this way, analysis and research played an important part in the development of the guideline.

A statistics bulletin and draft resource assessment were published alongside the consultation, and updated data tables and a final resource assessment have been published alongside the definitive guideline and consultation response document.

Summary of responses

The consultation sought views from respondents on the two separate guidelines. In total, 48 responses to the consultation were received.

Breakdown of respondents

Type of respondent	Number
Charity/not for profit organisations	2
Legal professionals	3
Judiciary (2 representative body responses)	2
Academics	2
Government	2
Members of the public	10
Magistrates (3 collective and 24 individual responses)	27
Total	48

Feedback received from the Council's consultation and interviews with sentencers during the consultation period is reflected in the text below.

In general, there was a positive response to the proposals. However, the Council was also grateful for constructive criticism and considered a number of suggestions for amending parts of the two draft guidelines. The detailed changes made to the individual guidelines as a result of the suggestions are discussed below.

Perverting the course of justice

Culpability factors

A number of respondents commented on the culpability factors of 'Underlying offence very serious' in high culpability and 'Underlying offence was not serious' in low culpability. The Justice Committee (JC) felt that this could be problematic: they recognised that the seriousness of the underlying offence is an established factor for the courts to take into account, but that if the factors are to be included it would be beneficial to offer more guidance. For example, whether summary offences should be considered serious or not - without further guidance there may be unintended consequences when sentencers decide what constitutes a very serious offence, they suggested.

Professor Alisdair Gillespie from Lancaster University was also concerned with the wording of the factors and suggested that mode of trial could be used to decide seriousness. He suggests that, as a general principle, indictable only offences should be considered the most serious, summary offences the least serious, with either way offences falling in between the two. Failing that he suggests adding the medium culpability factor the Council considered in early deliberations but discounted of 'Underlying offence reasonably serious'. The Justices' Clerks' Society (JCS) however felt that the wording as is in medium culpability is better than asking courts to decide whether the offence is somewhat or reasonably serious.

In devising these factors the Council had felt they were self-explanatory, but as a small number of consultation respondents felt additional guidance was needed, the Council carefully considered all the suggestions. However, the Council concluded that using the mode of trial could be misleading, as it is the seriousness of the offence committed, rather than the type of offence that is important. The Council has not previously assessed the seriousness of cases using mode of trial before and was not persuaded that it would be helpful to use it in this context. Therefore, the Council decided to leave the two factors unaltered.

A small number of respondents felt that there should be a culpability factor of an offender

holding a position within the justice system. The absence of such a factor was also raised by some research participants. Professor Gillespie suggested that committing the offence is more serious if the person is involved within the justice system or has an equivalent position of authority; he suggests the office holder is choosing to pervert the course of justice despite having a legal or moral obligation to facilitate justice. Similar comments were made by the Criminal Law Solicitors' Association (CLSA). Professor Gillespie goes further to suggest that where the act is linked to their job, such as a police officer deliberately changing a witness statement, this should go into high culpability. Where the act is not linked, such as a Judge giving false details in a speeding offence, that should be in lower culpability.

The Council agreed with these suggestions and decided to add an additional factor to high culpability of 'Breach of trust or abuse of position or office'. The factor doesn't focus on a particular type of job holder, such as a solicitor, but covers a wide range of job holders - if the offence is connected to the offender's position or office then the high culpability factor can apply.

A solicitor and Professor Gillespie felt that the proposed factors within medium culpability were too vague and asked if more factors could be added. Research participants offered mixed views on medium culpability, with one participant saying they didn't like how medium culpability is treated, and two others saying they did. The Council felt on balance it would not be helpful to add any additional medium culpability factors - as potential factors such as 'Underlying offence reasonably serious' are just 'lesser' versions of the high culpability factors and do not provide a great deal of assistance to assessing seriousness.

Women Against Rape (WAR) and the Centre for Women's Justice (CWJ) felt there needed to be better recognition of victims of domestic abuse, predominantly women, who are charged with this offence, and that a history of abuse may make their offending less serious. The CWJ felt that the lower culpability factor of 'Involved through coercion, intimidation or exploitation' needed to deal more explicitly with the dynamics of domestic abuse. They suggested that a court may look at this factor and think it doesn't apply in cases where an offender has not been expressly coerced into committing the offence. They suggest adding the words 'or as a result of domestic abuse' to this lower culpability factor.

The Council noted that when used as a mitigating factor, the [expanded explanation](#) for this factor does reference domestic abuse, but this additional explanation is only present for the mitigating factor, not the culpability factor. Accordingly, the Council agreed that the lower culpability factor should be amended to 'Involved through coercion, intimidation or exploitation or as a result of domestic abuse'.

Harm factors

Some research participants commented that when words like 'some' rather than 'serious' or 'significant' were used in category two harm, this leads to arguments by Counsel whether a case falls into category one or two. They asked whether there could be some guidance as to what is some or serious distress, like in the Manslaughter guidelines or Death by dangerous driving guidelines. The Council considered this but as they are very different offences and the guidelines are constructed differently it was not thought that anything could be usefully taken from these guidelines, and that additional guidance shouldn't really be needed to decide what constitutes serious harm.

A small number of respondents to the consultation also questioned the use of terms such as 'serious', 'substantial', or 'some', with one magistrate saying they were 'woolly' and another saying they were too open to debate and needed better definition. In particular, the Sentencing Academy and Professor Andrew Ashworth and the JC raised a concern with the harm factors relating to the impact on the administration of justice. They stated that by virtue of the offence, almost all cases will result in some impact on the administration of justice. So as currently drafted, they argue almost all cases will be swept into category two harm, it being difficult to see which cases would fall into category three. They also suggest that courts may struggle to see the difference between 'some impact' and 'limited impact', although the difference in sentence severity between the two is significant.

The Council considered the wording of factors carefully and decided the wording of the factors in category one and two was appropriate. However, the Council decided it would be helpful to amend and add factors to category three, to help sentencers assess the seriousness of offences, and try to ensure that cases do not fall into category two inappropriately. Category three harm is reworded to:

- limited distress caused to an innocent party
- limited impact on the administration of justice

- limited delay caused to the course of justice

One Judge noted that there was no explicit reference to the cost/impact on police in investigating false narratives, for example. The Council did consider doing so during guideline development but decided that this type of impact could be captured within the impact on administration of justice factors.

The JC, the CLSA and a magistrate raised a concern about the category one harm factor of 'Serious consequences for an innocent party(ies) as a result of the offence' and the category two factor of 'Suspicion cast upon an innocent party as a result of the offence (for example time spent in custody/arrest)'. They state that the casting of 'suspicion' could itself be considered to have serious consequences for an innocent party, including serious distress and loss of reputation, a false accusation made against a teacher for example. The magistrate felt that 'suspicion' should also be a category three harm factor. However, although there could be real consequences for innocent person of having suspicion cast upon them as suggested, it would not be the same level of harm caused as if they had been arrested or falsely convicted and sent to prison for a time.

The Council has also made some minor changes to the wording of the factors within all the harm categories so that there is consistency in referring to an 'innocent party'.

Sentence levels

Of those that answered the question in the consultation, the views expressed were that the sentence ranges were a little low. The JC, JCS, Professor Gillespie, Council of HM Circuit Judges (CoCJ) and Treasury Counsel (TC) all felt that the starting point in category 3C should be a custodial one, and not a community order - that having a custodial starting point would act as a deterrent and reflect the gravity of this type of offending. Some research participants also mentioned this. TC said that a significant amount of cases may fall into category 3C, and that having a community order as a starting point would be a significant departure from the principle that these offences ordinarily require a prison sentence. It was suggested that the starting point should be three or four months' custody.

The Council agreed that the range in category 3C should be increased, so that the starting point was a custodial one. The range has been increased so that it becomes a high level community order to nine months' custody, with a starting point of six months. The Council

has in more recent times moved away from having starting points of three or four months' custody.

The CPS and the JC felt that given the maximum sentence is life imprisonment there should be additional wording above the sentence range that states 'For cases of exceptional gravity, sentences above the top of the range may be appropriate'. TC also suggested similar wording. However, the Council has more recently moved away from using this wording (it was removed from the Domestic burglary guideline after the consultation stage, for example). The sentencing statistics show that only a tiny fraction (less than one per cent) of offenders sentenced to immediate custody in recent years have received sentences over seven years. There is clearly a gap between the top of the range and the maximum sentence theoretically possible, but this reflects the fact that as a common law offence Parliament has never set a maximum sentence for the offence.

Aggravating and mitigating factors

Aggravating factors

There were relatively few points raised by respondents in relation to step two factors for this guideline. The Council has decided to add an aggravating factor of 'Offence committed in a domestic context' in this guideline. It is more likely for this offence that offenders commit the offence under pressure from partners or family members so the issues are ones of culpability or mitigation. However it is also possible that other offenders may be committing the offence within a domestic context, in furtherance of a campaign against partners, etc, which is an additional consideration in adding it as an aggravating factor.

Mitigating factors

TC suggested that where an offender voluntarily admits their offending behaviour to police, this should be a mitigating factor. However the Council was not persuaded that it was necessary to add this as a mitigating factor, as step two is non-exhaustive so courts could take this into account if relevant.

The JC, the CWJ and a research participant felt there should be a mitigating factor of offender being subject to domestic abuse. The Council has already decided to add a reference to domestic abuse to the lower culpability factor at step one, so did not feel it was necessary to also add a mitigating factor.

Witness intimidation

Culpability factors

A small number of respondents commented on the 'Breach of bail conditions' as a high culpability factor. The Chief Magistrate raised a concern that as worded it could result in a disproportionate number of cases falling into culpability A. He asked whether a distinction could be drawn between those cases where the breach of bail is a breach of a condition expressly imposed to prevent an offence of witness intimidation, and those cases where the breach occurs incidentally to the offence. He suggests the former type might fall into culpability A, and the latter into categories other than A. Professor Gillespie and a magistrate also raised similar concerns.

The Chief Magistrate also suggests that the words 'and/or protective order and/or after Police warning re conduct' should be added, whichever category the factor is placed in. The Council agreed that it would be helpful to reword the high culpability factor, and so it has been reworded. The only relevant provision available to the police that could be classed as a police warning is the Domestic Violence Protection notice - due to be replaced by the Domestic Abuse Protection notice. These are notices that the police can issue while applying for a court order. The rest of the relevant provisions are court orders. Therefore, the factor has been reworded to two separate factors 'Breach of specific bail conditions and/or protection notice imposed to protect a witness' and 'Breach of court order (see step five on totality when sentencing more than one offence)'.

Some respondents, including a research participant, were concerned with the factors relating to violence or threats of violence. They felt as drafted the factors in high culpability of 'Actual or threat of violence to witnesses and/or their families' and the medium culpability factor of 'Non-violent conduct amounting to a threat' could lead to difficulties for sentencers and asked if the factors could be made clearer. The Council considered the concerns raised carefully, but on balance decided not to make any substantial changes. The medium culpability factor was designed to be less serious than the actual or threat of violence in high culpability, comprising of perhaps approaching a witness and making verbal comments. The Council felt in designing these factors there shouldn't only be actual violence in high culpability - threats of extreme violence in some circumstances could be

as serious as actual but lesser violence.

The Council did decide to remove the reference to witnesses and families, so the factor is now 'Actual or threat of violence', as on reflection the reference to witnesses is superfluous – the offence is of intimidating witnesses.

Some concern was raised regarding the high culpability factor of 'Deliberately seeking witnesses', and the Council has decided to remove this factor altogether – as this activity would be captured by the 'Sophisticated and/or planned nature of conduct' factor.

A number of respondents, including the Chief Magistrate, were concerned with the lower culpability factor 'Unplanned and/or limited in scope and duration.' The Chief Magistrate said that many such offences are short, but are extremely serious, so are not lower culpability. Two magistrates queried whether the offence could ever truly be 'unplanned' and that the wording should be removed. West London Magistrates Bench suggested instead that it should be reworded to 'Contact with witness unplanned and/or limited in scope and duration'. The Council felt that there does need to be a lower culpability factor - some incidents could be chance encounters and/or brief incidents, which are not as serious as the types of offence in high culpability. The Council decided to reword the factor, removing the 'or', so it would only fall into lower culpability if unplanned **and** limited, so it is reworded to 'Contact with witness unplanned **and** limited in scope and duration'.

The Magistrates Association (MA) suggested that there should be an additional high culpability factor of 'Hire or commission of a group or gang to intimidate witnesses'. However the Council felt that this could adequately be covered by the existing high culpability factor of 'Sophisticated and/or planned nature of conduct'.

Harm factors

The proposed harm factors were generally agreed with by respondents, subject to some points of detail discussed below. During the research into the guideline all of the sentencers felt the draft guideline helped them determine which harm category to apply. A considerable number of respondents including the MA, JC, the Chief Magistrate, HM Council of District Judges (CoDJ), and the JCS all suggested that place of work should be added to the first harm factor in category one. As this is a location in which victims can

easily be found, respondents argued that contact at a victim's workplace is also common, particularly in cases with a domestic abuse context, and that this can be very distressing for victims. The Council agreed with this suggestion so the first factor in category one harm has been reworded to 'Contact made at or in vicinity of victim's home and/or workplace'.

A number of respondents suggested that there should be a reference to the families or children of victims within the harm factors. Professor Gillespie and the JC both suggested that there should be a reference to harm caused to the family or children of the victim within category one harm. CoCJ suggest that there should be a reference to the impact on family members/children if the contact occurs in their presence either at step one, or if not, as an aggravating factor. The Council has decided it is important to reflect any impact on children so has added an aggravating factor of 'Child present and/or child caused serious distress'. If contact is made at home in their presence then this will be captured by category one harm in any case.

A small number of individual magistrates, one magistrates' bench and the JCS commented on the 'Limited effects of the offence' factor in category three harm. The JCS said that this factor is unclear and proposed instead 'Harm which falls below categories one and two'. One magistrate disliked the factor saying there were never just 'limited' effects of the offence; another magistrate said that it left too much judgement to the sentencer so instead suggested 'no effect'. One magistrate said this factor needed to be more specific. The magistrates bench suggested instead rewording to 'Minimal distress and/or harm caused to the victim'. The JC said that generally additional guidance was needed to distinguish between category two and three harm.

The Council considered the use of terminology carefully in deciding these factors. It is quite difficult to get the wording of category three right, to ensure that the appropriate level of harm is captured, without minimising the impact these offences have on victims. On balance, it is suggested that the original wording of 'Limited effects of the offence' is right, so that sentencers can see it as a meaningful option below 'some' harm in category three. The Council did decide, however, to add the words 'and/or impact' to all of the factors relating to the distress caused to the victim, to reflect victims having to change their day to day activities as a result of the offence. So these factors now are:

- category one harm – serious distress and/or impact caused to the victim
- category two harm – some distress and/or impact caused to the victim
- category three harm – limited distress and/or impact caused to the victim

The Council also decided to add 'Limited impact on administration of justice' to broaden out the assessment of harm in category three.

The JCS suggest that there should be a category one factor relating to offences which occur in a custodial establishment. They argue that those in custody may be witnesses in other cases and may have significant grounds to fear violence, as unlike other witnesses they are unlikely to be able to move location to avoid the intimidation. The Council agreed that there should be a factor reflecting this within the guideline - but that it should be an aggravating factor of 'Offence committed in custody'.

Sentence levels

There were few consultation responses offering comments on the sentence levels for this guideline; one or two magistrates said they thought some of the ranges were too low, and the CPS again said that the wording 'For cases of exceptional gravity sentences above the top of the range may be appropriate' should be added. Professor Gillespie and the JC thought that the starting point in category 3C should increase from a medium to a high level community order and the JCS thought the ranges in 3C should echo the lowest ranges in the [current guideline](#), which has a starting point of six weeks' custody, in a range of a medium level community order to 18 weeks' custody. The JCS stated that a custodial sentence as a starting point for all offences of witness intimidation is appropriate to have a deterrent effect, and to demonstrate that any attempt to contact a witness is very serious.

The Council agreed that the ranges in category 3C should be increased a little, so the range is now a medium level community order with a starting point of a high level community order, with the top of the range staying at six months' custody. The Council has moved away from having very short sentences, such as six weeks' custody, within guidelines. The Council did not feel any other changes were appropriate to sentence levels.

Aggravating and mitigating factors

A small number of respondents including CoDJ and a research participant felt that there should be an aggravating factor relating to domestic abuse. They stated that it is fairly common for these offences to have a domestic abuse context. The Council agreed that this factor should be added, so 'Offence committed in a domestic context', has been added.

A small number including the Chief Magistrate, the London Criminal Courts Solicitors' Association (LCCSA), a research participant and a few magistrates queried the 'Use of social media' as an aggravating factor. They said that it was too vague, and risks over aggravating the sentence - as social media can be used in so many ways. The Council thought these were sensible observations so the factor has been removed.

The JC felt that there should be an additional factor of threats conducted in the vicinity of a court, as by doing so it makes the offence more serious. The Council was not persuaded of the need to add this as a factor - as step two is non exhaustive courts could still take this into account where relevant without adding it as a factor.

As noted earlier in the discussion, two additional aggravating factors have been added, 'Offence committed in custody' and 'Child present and/or child caused serious distress'.

There were no substantive points raised on the mitigating factors so these remain the same as consulted on.

Equality and diversity issues

The consultation asked three questions regarding equality and diversity: whether there were any aspects of the guidelines that may cause or increase disparity; whether there were existing disparities within the sentencing of these offences that the guidelines should address; and if there were any other equality and diversity matters that should be addressed.

Very few respondents answered these questions. The few that did respond such as the CWJ and WAR mentioned that women are much more likely than men to be victims of domestic abuse and exploitation that could lead them to be convicted of a perverting the course of justice offence. In addition, CWJ stated that black, Asian, migrant and disabled women face additional barriers to accessing support and accessing justice, and that young women and girls have distinct experiences, such as trauma, that are overlooked. They argue that the guidelines should be amended to ensure equal treatment in relation to ethnicity, sex, disability and age. As noted earlier the Council has added a reference to domestic abuse within the lower culpability factor so that it now reads 'Involved through coercion, intimidation or exploitation or as a result of domestic abuse'.

During research with sentencers specific questions relating to equality and diversity were asked. Comments made by participants generally focused on the Equal Treatment Bench Book (ETBB), although there was no real consensus on anything else these guidelines could provide. One sentencer commented that there should be a reference to the ETBB as a step in every guideline, another commented that there should be an overarching guideline for equality and diversity, but another said that there are already so many overarching guidelines to use. The Council already includes a reference to the ETBB at the start of every guideline.

The updated [sentencing data](#) includes the available demographic data on ethnicity, sex and age. Looking at sex, a relatively high proportion of offenders sentenced for perverting the course of justice offences are female (26 per cent in 2021). However, there is no noticeable disparity in sentence outcomes and average custodial sentence length (ACSL) between male and female offenders. A similar proportion of males and females are given a custodial sentence, but a higher proportion of females receive a suspended sentence,

which is in line with other offences.

In 2021, a similar proportion of black and white offenders received a custodial sentence for perverting the course of justice offences. However, a higher proportion of black offenders were sentenced to immediate custody compared to white offenders – 62 per cent and 48 per cent respectively. Although this difference was also seen in 2020, in years prior to 2020, similar proportions of black and white offenders were sentenced to immediate custody. It should be noted that the number of black offenders sentenced for this offence is much smaller in comparison to white offenders (40 versus 290 in 2021) and there is no noticeable difference in ACSL.

In 2021, the proportion of offenders receiving immediate custody for witness intimidation offences was higher for black offenders compared to white offenders (80 per cent and 58 per cent respectively). This difference has been consistent over the last five years, except in 2020 when a similar proportion of black and white offenders were sentenced to immediate custody. Additionally, a higher proportion of white offenders received a suspended sentence over recent years. However, volumes for black offenders are much smaller than for white offenders (10 versus 140 in 2021) and so, these differences should be interpreted with a degree of caution. There is also no noticeable difference in ACSL. For sex and age the data did not show any notable differences between groups.

For perverting the course of justice offences, the mean ACSL for younger offenders (the '18 to 20' years group) was slightly higher in 2021 compared to other age groups. Offenders aged '18 to 20' received an ACSL of 1 year 9 months, while those aged '30 to 39' received an ACSL of one year. However, demographic data for previous years show no noticeable difference between age groups and the number of offenders who were sentenced to immediate custody aged '18 to 20' is much smaller in comparison to those aged '30 to 39' (10 versus 110). Therefore, the figures should be treated with a degree of caution.

The Council has carefully considered these statistics and does not feel any action is required on either guideline. Due to the small number of black offenders sentenced to these offences compared to white offenders, it is difficult to draw valid conclusions from these figures. Additionally, for a proportion of adults sentenced, their ethnicity was either not recorded or it was not known. Therefore, the proportions amongst those for whom data

was provided may not reflect the demographics of the full population, and these figures should be treated with caution.

The Council is grateful to all those that answered questions in this area. The Council considers matters relating to equality and diversity to be important in its work. The Council is always concerned if it appears that the guidelines have different outcomes for different groups. It takes care to ensure that the guidelines operate fairly and as noted above includes reference to the ETBB in all its guidelines, which states:

Guideline users should be aware that the [Equal Treatment Bench Book](#) covers important aspects of fair treatment and disparity of outcomes for different groups in the criminal justice system. It provides guidance which sentencers are encouraged to take into account wherever applicable, to ensure that there is fairness for all involved in court proceedings

The Council is also considering the findings from the independent research by the University of Hertfordshire that the Council commissioned on [Equality and diversity in the work of the Sentencing Council](#), which reviewed its work for any potential to cause disparity in sentencing across demographic groups. The work looked at the structure of selected guidelines, the language and factors used (included aggravating and mitigating factors) and the expanded explanations, as well as whether any aspects of its processes of guideline development and revision have any implications for equalities and disparity in sentencing.

Conclusion and next steps

The consultation has been an important part of the Council's consideration of this guideline. Responses received from a variety of sources informed changes made to the definitive guideline.

The guideline will apply to all adults aged 18 or over sentenced on or after 1 October 2023, regardless of the date of the offence.

Following the implementation of the definitive guideline, the Council will monitor its impact.

Annex A: consultation respondents

1. Pascale Jones (CPS)
2. Chris Hillyard JP
3. Michael Evans JP
4. Jane Fox JP
5. Kim Watson JP
6. Gary Knight JP
7. Diana Chitty
8. Neil Taylor JP
9. Rani
10. Christopher Turner JP
11. Anonymous
12. The Chief Magistrate
13. The Treasury Council
14. Nigel F O'Mara JP
15. Ian Harris JP
16. Paula Yates JP
17. Sarah Cahill JP
18. Suffolk Magistrates Bench
19. The Legal Committee of HM Council of District Judges (Magistrates' Courts)
20. Professor Alisdair A. Gillespie, Professor of Criminal Law and Justice
21. West London Magistrates' Bench
22. Criminal Sub-Committee of HM Council of Circuit Judges
23. CPS
24. Sentencing Academy and Professor Andrew Ashworth
25. Centre for Women's Justice
26. Women Against Rape
27. Justices' Legal Advisers and Court Officers' Service
28. Criminal Law Solicitors' Association
29. Magistrates Association
30. Heather Rothwell JP
31. Tom Bell
32. Robert Wade JP
33. Peter Trend JP
34. Bruce Cameron JP
35. Tina Symons JP
36. Anonymous
37. Tim Cosham
38. Paul Ashwell
39. Jacqui Currie JP
40. David King JP
41. Jonathan Law

42. Barbra Aitchison
43. Martin Alderman JP
44. Jean Watt JP
45. Chris Clarke JP
46. Liz Blake JP
47. Edward Jones
48. Justice Committee

