Keith Davies (KD) and UK Athletics Limited (UKA)

Sentencing Note

1. KD, the first D and UKA, the second D, were charged on an indictment containing 4 counts. KD was charged with gross negligence manslaughter (count 1) and in the alternative with failing to take reasonable care for health and safety, contrary to s. 7(1) and 33(1) of the Health and Safety at Work Act (count 2).
2. UKA were charged with corporate manslaughter (count 3) and in the alternative with failing to ensure the safety of Non-Employees, contrary to s, 3(1) and 33(1)(a) of the Health and Safety at Work Act 1974 (count 4).
3. At the PTPH on 18/3/25 both Ds pleaded not guilty to the charges which each of them faced.
4. When they next appeared here, nearly a year later, on 20/2/26, KD was rearraigned on count 2 to which he pleaded guilty. UKA were rearraigned on count 3 to which they pleaded guilty.
5. These pleas were accepted by the prosecution and the matter was adjourned until yesterday and today for sentencing.
6. In each case I have read and fully considered copious written and oral submissions, reports and references from all sides and I am grateful to all counsel for their considerable assistance in this regard.

Factual background

7. The case concerns the tragic, untimely and wholly avoidable death of Mr Abdullah Hayayei (AH) on 11/7/17. He was aged 36 at the time of his death. He came from the UAE and was in London at this time for the purpose of participating in the shot- put competition at the Para Athletic Event which was a part of the World Athletics

Championship that were due to take place between 14th and 23rd July 2017. He had a history of cerebral palsy and used a wheelchair for mobility.

8. I have been apprised via statements from his wife and brother, of the effect of his death on his family. He was a married man with 5 children, aged at the time of his death between 14 and 2, and was the primary breadwinner for the family. As a result of his death , their income has reduced to a little under a quarter of what it was. The shock of his death and the emotional and financial consequences to them have been very substantial, as can be well imagined and understood.
9. UKA is the national governing body for the sport of athletics in the UK. They provide a high level governance and regulation of athletics across the UK and over the years have also overseen the organisation of major events including the Olympic and Paralympic programmes along with other sponsors.
10. Pursuant to a service agreement, in advance of the championship competition, UKA had set up a training facility for competing athletes at the Newham leisure centre. 2 shot-put cages, one purple and the other white, had been erected at the site for the use of practising athletes. The cages had been acquired by the Organisation committee for the London 2012 Olympic Games and had been manufactured by a specialised European company Mondo. At the conclusion of the 2012 Games the two cages had been gifted to UKA which meant that the responsibility for their safe use was now theirs to be exercised as a part of their general obligations concerning the safety of activities at UK athletic events, both at competitions and for training, responsibilities shared by UKA's directors, senior managers and staff.
11. The cages were a large piece of equipment comprising various metal parts and netting. When erected they were five metres tall and 5 or 6 people were required to

assemble them. The net lift to the cage weighed approximately 75 kilos and 5 poles/posts in total a further 125 kg.

12. On the afternoon of 11th July 2017, AH was training within the purple cage. He was inside the throwing circle and was practising the shot put. He was receiving guidance from the team coach and his assistant as to the appropriate movements he needed to make. Whilst he was carrying out a number of throws, a strong gust of wind in the low 30s mph, was suddenly encountered which moved the entire cage causing the metal bar on the top of the cage to fall directly on to AH’s head.
13. When the cage collapsed its various metal parts, that is 5 metal posts and the net lift, went to ground. The blow to AH’s head caused him to collapse immediately which necessitated him being cut free from the netting. Emergency medical treatment was administered but sadly he never regained consciousness and he was pronounced deceased at 7:20 that evening.
14. The cause of death was described as head injury. Severe head injuries were present consistent with the collapse of a heavy piece of metal equipment onto the deceased's head which had caused scalp bruising and very extensive skull fractures to both the skull vault and base, with severe brain injury.
15. The prosecution case is that the root cause of this accident is that the cage, which was owned by UKA who had responsibility for the safety of activities at athletic events, had not been correctly assembled and erected; if it had been, it would have withstood the gust of wind.
16. The prosecution say that there were the following defects:
    i. the principal defect which is at the very heart of this case, is that the 10 metal base plates which sit on the ground and connect each of the

vertical pillars around the whole perimeter of the cage, and are crucial to its stability, had not been fitted;

Less significantly, but other factors nonetheless were the following:

ii. the structure had been assembled on slightly sloping ground instead of flat ground as it should have been;

iii. stabilising water bottles were not sufficiently full and so did not provide required stability for the cage;

iv. several bolts were missing from the u-shaped net holder rail, with a steel cable used to support the net without fixing; and

v. the cage was used by an athlete when the wind speed was likely to have been in excess of that recommended for a properly constructed cage.

17. KD, prior to your retirement your career was that of a PE teacher, but you have been very closely involved in the world of athletics since your 20s, and I accept you have dedicated much of your life to helping others through teaching and sport. For you to find yourself in the dock of a criminal court is unquestionably a personal tragedy.

18. You had worked for UKA for many years where your official title was Head of Sport. You were identified as one of the three members of the UKA management group and were a member of the London 2017 Operations Oversight Management Group. That said, I acknowledge that your renumeration of £20,000 per annum was on any view modest, and I note that your authority level in terms of expenditure was limited to as little as £5,000. I further accept that you had no significant influence over how UKA was run as a business, nor were you in any way responsible for either the policy or the direction of the company.

19. I also note and accept the observations made in the Sentencing Note of UKA, which acknowledges firstly that nobody there would have considered you to be part of the senior management team of the organisation at this time; and secondly that they owed you a duty of care and that they failed in that regard.

20. However, it is right to observe that amongst UKA staff you knew the workings of the two cages better than anyone and had visited the Mondo factory in Spain in November 2010. Moreover, in the first instance I am satisfied that you had seen technicians from Mondo erecting the cages, as well as seeing and reading the instructions and diagrams as to its erection; so, in my judgment you knew, or at the very least, ought to have known that the base plates were an integral part of the construction.

21. That conclusion is borne out by the fact that in the aftermath of the accident you were to say (although this is not accepted by the prosecution) that you had contacted Mondo after the Olympics (in 2012) about the fact that the base plates were missing, enquiring where they were. If they were in your mind of no importance, I ask rhetorically why would you have bothered to make that enquiry?

22. In the aftermath of this accident you were to say that UKA had never had the base plates for either cage. It appears, however, that was not the case in that the base plates for one of the two cages had been seen and indeed photographed by a witness, a Mr Brian Abbs, in a storeroom at the London Stadium; and they have since been recovered from a storage facility in Cambridge to which they were moved in July 2017. The base plates for the other cage have never been recovered.

23. These base plates perform an important role, as a part of the design, helping to secure the stability of the uprights. They enable them to resist wind, as a group, rather than each on its own. When the cage collapsed that afternoon, the pillars being bound

together at their tops by the net lifting frame had not been secured at the bottom by base plates, so that the various very heavy metal parts that formed part of the structure that was in place fell over and dropped to the ground together.

24. As was, in my judgment, foreseeable in the circumstances, one of them hit a person nearby, in this instance AH who was within the cage. In other circumstances, it could just as easily have been some other person, or persons, either in the cage or passing or standing nearby to it, for some other reason.

25. Other factors were also in play and contributed to what happened, as I have already set out, although I note and accept the submission made on behalf of UKA that the evidence would justify the conclusion that the fact that the water bottles were not full may be because they had leaked consequent on the collapse of the cage.

26. The prosecution say that the events that led to this accident were not a sudden and unexpected one off but rather involved a course of negligent conduct on the part of the Ds, based upon the following.

27. Firstly, one of the cages had collapsed in 2012, albeit fortunately no one was hurt on that occasion. Pausing there, I have to be cautious about this incident in that the sole evidence about it comes from you, KD, and other than the fact that there was a strong wind at the time, the precise circumstances in which this occurred are uncertain. The fact does remain, however, that by reason of that earlier incident, in my judgment , you were on notice and ought at the very least to have realised that the possibility of a recurrence could not be discounted.

28. Secondly, there is evidence that in the five years since UKA acquired the cages and during which time you, KD, accept that on 3 occasions you played a part in assembling and disassembling them at training and competition

events in the UK, the two cages were never used with their base plates, such events taking place annually between 2012 and 2017, the prosecution say on a total of 7 occasions, when many athletes will have been within the cages and many others are likely to have been standing or passing close by. Thus, say the prosecution, and I regard this as being a fair observation, this was an accident which sooner or later was waiting to happen.

29. In summary outline, at the time of the offending, the prosecution put their case as follows.

UKA

30. That there was a lack of any structured approach to managing the risks associated with the provision of the throwing cages, a passive reliance on others to inform them of *'issues'* with the cages, and an absence of an effective system to investigate failures [1]. More specifically: -

    i. That there was no system in place to ensure that all parts were present and correct, and free from damage, either when the cage was taken out of storage for use or returned to storage after use;

    ii. That there was no sufficient training provided to those persons engaged in the assembly or dis-assembly of the cage;

    iii. That there was no system in place to identify risks inherent in the use of the structure otherwise than in accordance with the manufacturer's instructions and no system in place to control any such risks identified;

    iv. That there was no guidance or policy or other similar document dealing with the assembly or dis-assembly of the cage; or to deal with the use, servicing, storage or management of the cage more generally.

[1] See: - TH1a at DCS J(14)5/128, §45:

KD

31. Between October 2012 and 12 July 2017, and having assumed some responsibility for an involvement in the periodic assembly and dis-assembly of the cages, you failed to take reasonable care for the health and safety of others in: -

    i. Your supervision of the erection of the purple cage on 9 – 10 July 2017 and the overseeing its erection without its stabilising base structure;

    ii. Your supervision of the erection of the cages on other occasions in the indictment period and overseeing their erection without their stabilising base structure;

    iii. Your failure to ensure that the cages were erected in accordance with the manufacturer's instructions and in particular with their stabilising base structure in place.

Sentencing Guidelines

32. I am required by law to have regard to the Sentencing Guidelines in reaching an appropriate sentence in the case of both Ds., and I have had close regard to the Guidelines which require me to determine in each case the level of both culpability and harm.

KD

33. There is a substantial difference between your counsel and prosecuting counsel as to the correct categorisation in relation to both culpability and harm, as to which I am required to make an adjudication.

Culpability

Prosecution Submissions

34. The prosecution say that your level of culpability is high, i.e. that it involved actual foresight of or wilful blindness to the risk of offending. They submit that the evidence shows that you knew that the cage had not been erected in accordance with instructions; and that you must have known that a failure to erect the cage in such circumstances, and in particular without the necessary stabilisers, would give rise to a risk of collapse; and that you knew of the 2012 incident when a like cage had fallen in a gust of wind. Hence why they submit that you had actual foresight of, or wilful blindness to the obvious risk which arose in this case.

Defence Submissions

35. As to culpability, reliance is placed on the fact that you have a complete lack of any engineering knowledge or background, also that your training by UKA in relation to the erection of these cages appears to have been non-existent.

36. Whilst I accept both of these points, having seen a helpful video reconstruction of the cage, I have much greater difficulty with the proposition that only someone with an engineering background could have appreciated that these metal base plates were an integral and important part of the structure.

37. Further, it is submitted on your behalf, and I accept from everything that I have read about you in the many compelling references with which I have been provided, and which are of the very highest order, that your

involvement in athletics was your whole life, and you approached your responsibilities with a very high level of commitment and dedication; thus, it is argued by your counsel that the degree of irresponsibility and dereliction of duty for which the prosecution contend in their purported categorisation of your culpability belies everything that has been written and is known about you in your wholehearted commitment to this sport.

38. Against this background, and considering the totality of the evidence and submissions, in my judgment the prosecution have failed to establish to the required criminal standard of proof that you had actual foresight of, or wilful blindness to what I do regard as the obvious risk which arose in this case.
39. It is submitted on your behalf that this is a case of low culpability, i.e. that the offence was committed with little fault, in that significant efforts were always made by you in everything that you did generally, and specifically as regards safety.
40. Whilst I accept that your effort is not in question, that is only one factor of relevance. Looking at the evidence as a whole, I am in no doubt that at the very least, from your personal knowledge, dealings with and understanding of these cages, that you ought to have realised that these missing base plates were of importance and that their absence had the potential to be a serious problem, having regard to the obvious and very grave consequences that could ensue if a cage collapsed, as it had done in the past to your knowledge.
41. In addition, this was not a one off failure to take reasonable care, bearing in mind that these cages had been used without the base plates over a number of years.

42. Accordingly, I am in no doubt that this is not a case of low culpability, but rather one of medium culpability, that is that the offence was committed through an omission which a person exercising reasonable care would not have committed.

Harm

43. As to harm, I remind myself that the offence is in creating a risk of harm, i.e. the offence does not require proof that any actual harm was caused although it is an aggravating factor if it was.

Prosecution Submissions

44. The prosecution submit that the seriousness of harm risked by the breach was level A, i.e. death and the likelihood of that harm arising was **medium,** resulting in an overall harm at category 2 level.
45. The prosecution remind me that the Guideline requires the Court to consider whether the offence exposed a number of members of the public to the risk of harm; and whether the offence was a significant cause of actual harm. i.e. a cause which more than minimally, negligibly, or trivially contributed to the outcome.
46. If one or both factors apply, the Court must consider moving up a harm category or substantially moving up within the category range.
47. The prosecution submit that the offence exposed all those who used the cage or operated in its vicinity, when it was erected without proper stabilisation between October 2012 and July 2017, to a risk of serious harm. Further, the offence here was THE significant cause of actual harm of the most serious kind to AH.

Defence Submissions

48. As to harm, it is accepted on your behalf, as obviously it must be, that the harm which ensued was the gravest. It is submitted, however, that there was a **low** likelihood of harm, thereby making this a category 3 case; that submission is advanced on the basis that it was improbable that the cage would collapse, also that a person would be present in that precise location at the moment of its fall.

49. I am prepared to accept that there may be some force in that submission in that there was here a very unexpected combination of a number of different factors. However, that is not the sole consideration in so far as this aspect of the Guidelines is concerned; because I AM satisfied of the following:

    i) that the offence <u>did</u> expose a number of members of the public to the risk of harm, not just the athlete using the cage at any one time, but also the trainer(s), as well as anyone else who might be in the vicinity at the time;

    ii) Whilst I of course recognise, as is submitted on your behalf, that causation is not an element of the offence with which I am dealing in your case, nonetheless, I am satisfied that the offence, i.e. your failure to take reasonable care, was in the event a significant contributory cause of actual harm, i.e. one that was more than minimally, negligibly or trivially contributed to the outcome, which is relevant in so far as this aspect of the Guideline is concerned.

50. Because I consider that these 2 factors are both in play here, I am of the view that it is appropriate to move up, in relation to harm, from level 3 to level 2.

Conclusion as to Categorisation

51. For the reasons that I have set out, I regard this offence as being medium level culpability, category 2 harm, for which the SP is a band F fine, with a range of a Band E fine or medium level community order to 26 weeks custody.
52. As to aggravating features, there are none, as per the guidelines, or indeed otherwise.

Personal Mitigation

53. There are a number of significant factors:

i) Your age. You are a few days short of your 79th birthday;

ii) You are a man of previous good character who has led a completely blameless life;

iii) I have referred to your character references which on any view are exceptional ;

iv) Delay-this incident happened 9 years ago, and so you have had this matter hanging over your head for a very considerable period time, which I accept has resulted in a huge amount of stress for you, your wife and your family. This included a period of just over a year in which you faced a very serious allegation of gross negligence manslaughter, before the prosecution indicated that they did not intend to pursue that charge; you will undoubtedly have realised that conviction of that offence would in all probability have involved very serious consequences;

v) Remorse; notwithstanding what the author of the PSR, Ms Stephen, has written in this regard, (and I am bound to say, to put it mildly, you have done yourself absolutely no favours in what you told her generally), I am satisfied from everything else that I have read that you are genuinely remorseful for what happened;

vi) Discount for your plea. I am told that a plea to count 2 was indicated at the PTPH, but that offer was at that time rejected. It is submitted on your behalf that in these circumstances the discount to which you are entitled is 25%. The difficulty with that submission is that no

such plea was tendered at that time, as it could have been, and no such plea was entered until February 2026. In the circumstances in my judgment the maximum credit to which you are entitled is the median figure between 15 and 20%.

54. This is manifestly a serious case, having regard to both the tragic consequences that ensued in the course of this accident as well as the fact that the failure to use the stabilising base plate did not arise just on the day of this accident but over a number of years. In addition, there was that previous incident in 2012 to which I have already referred when an identical cage (the white cage) was blown over in the wind. Albeit happily nobody was injured on that occasion, as I have already observed, its relevance is that you were on notice that such an event could recur and it must have been obvious that if it did, a very different outcome could ensue.
55. That said, having regard to your very significant mitigation, I have come to the conclusion that a custodial sentence, whether immediate or suspended would not be either appropriate or proportionate.
56. I am satisfied that the justice of your case can and should be met by the imposition of a community order, 175 hours.
57. NG verdict on count 1.
58. Surcharge £85.
59. No order as to costs.

UKA

60. UKA fall to be dealt with for corporate manslaughter, an offence which is of

a wholly different order of seriousness to that in respect of KD.

61. The Sentencing Guideline for this offence requires the court to determine 2 factors, i.e. whether the offence is category A or B and the size of the organisation.

62. The prosecution accept that the appropriate categorisation is ‘B’ albeit, they submit, towards the upper end of that category. So far as this is concerned they rely on the following:

    i) That there is no real evidence that UKA had a system to identify risks in relation to their operations or that they reviewed or monitored safety activity.

    ii) There is no evidence that they had in place any processes to manage risk or to ensure that any risk control systems were effective.

    iii) There was no effective storage management and inspection system in relation to the equipment in question.

    iv) Those assembling the cages were not trained at all or at least not adequately.

    v) The risk persisted for a long period of time.

63. As to the factual basis upon which the court should approach the sentencing exercise in the case of UKA, the defence do not substantially disagree with the prosecution as to the 5 points that I have just set out.

64. I observe from the sentencing note submitted on behalf of UKA, at paragraph 24, ‘UKA accepts by its plea what is set out by way of conclusion in the prosecution expert Mr Hetherington's report at paragraph 45, namely, that it failed to provide a structured approach towards the provision of portable throwing cages relying on people not systems. It accepts in that

regard it fell far below the standard of risk management that would reasonably be expected of an organisation in its position. It accepts that this was the case from after the Olympic Games in 2012 when it took ownership of portable throwing cages for the first time until the incident on 11th June 2017.'

65. As to the second aspect of the Guidelines, at step 2, the court is required to consider the size of the organisation based upon its turnover. For the year ending March 2024 that figure was just over £16,600,00, with a loss before tax of just over £I,173 000 and for the year ended March 2025 the turnover was just over of £13,830,000 with a modest profit of just over £107,000. For the current year I am told that they expect to make a loss of in the region of £400,000.
66. Under the Guidelines a medium organisation is one that has a turnover of between £10 and £50 million, so this is such an organisation, albeit it is clear that it is near the very bottom of that category, which I accept necessitates a downward adjustment from the starting point

Defence Case

67. On behalf of UKA no issue is taken with the prosecution's categorisation under the Guidelines. However, my attention is drawn to Step 2 which requires the court, having focused on the organisation's annual turnover to reach a starting point for a fine and to then consider further adjustment within the category range for aggravating and mitigating features.
68. It is common ground that none of the aggravating features referred to in the Guidelines are applicable.

69. Conversely, I accept that there is very substantial mitigation, which falls broadly under 4 different headings.

70. Firstly, the point is made, to quote their sentencing note, that UKA is essentially a club of passionate members, invested in the progression of athletics in this country rather than profit. It has essentially 2 core objectives: to develop a pathway for elite athletes in this country to be able to represent the UK in athletic events at the highest level including the Olympics and Paralympics; and to support grassroots athletics throughout the UK by assisting Home Country Athletics Federations with the competitive events which they organise.

71. I have been provided with a number of compelling references as to the very considerable assistance that has been derived from the support of UKA, and I fully accept that the extensive beneficiaries have been individual athletes as well as communities throughout the UK.

72. The submission is made, which I accept, that the effect of any financial penalty will be to diminish the services which UKA provides, to weaken its ability to support individual athletes, as well as athletics in communities and athletics events which are in the public and national interest. I shall return to this aspect of the case shortly.

73. Secondly, I note and will of course take into account the fact that UKA has no previous convictions.

74. Thirdly, my attention has been drawn to the remedial steps that UKA have taken to address the issues that led to the commission of this offence, as set out in the statement of Jack Buckner, UKA's CEO; such that I am entirely confident that an accident of this sort could not recur. Without in any way

seeking to detract from the value of all of this, it does bring into sharp focus the many aspects in which UKA's previous approach to issues around health and safety were profoundly inadequate.

75. Fourthly, there is, as in the case of KD, the issue of delay, the real relevance of which in UKA's case is that there has been no similar offending or safety issues in that time.
76. I turn next to step 3 of the Guidelines which requires me to step back, review and, if necessary, adjust the initial fine based on turnover to ensure that it fulfils the objectives of sentencing for these offences. In particular I am required to check whether the proposed fine based on turnover is proportionate to the overall means of the offender.
77. The Guidelines further state that the profitability of an organisation will be a relevant factor. If an organisation has a small profit margin relative to its turnover, a downward adjustment may be needed. A fortiori if there is no profitability.
78. I have considered in this regard the witness statement of Mrs Ruth Thompson, UKA's chief operating officer. I note that their income is made up primarily of grant funding amounting to over £8,000,000 in 2025 which is intended to fund the world class performance programme such that these funds are effectively ring fenced for this purpose and therefore cannot realistically be used to fund non qualifying expenditure such as a financial penalty.
79. I accept that any fine paid from their non ring fenced cash reserves would directly impact on the provision and delivery of their core activities in particular the provision of support for grassroots athletic events and athletes.

80. At Step 4 the court is required to consider any wider impacts of the fine within the organisation, such as the impact on the employment of staff, service users, customers and the local economy. Where the fine will fall on public or charitable bodies it should normally be substantially reduced if the offending organisation is able to demonstrate that the proposed fine would have a significant impact on the provision of their services.
81. I have sought assistance from counsel as to what is meant by 'substantial.' My attention has been drawn to the case of **R v. Havering LBC** 2017 EWCA Crim 242, in which this issue arose and the CACD stated, ' *It is argued that the meaning of "substantial" reduction at Step 4, when imposing a fine on a public body, should be at least 50%. No authority is provided to support this contention, and there is nothing in the guideline to suggest it. It is deliberately left open to the sentencer to make a substantial reduction when fining public bodies or charitable organisations. It is plainly left to the discretion of the sentencer when deciding what level of reduction to give.'*
82. My attention has also been helpfully drawn to a number of other decided cases where this point has arisen. It is clearly a fact specific exercise, although it is right to say that in those cases the discount under this heading has generally been between one third and a half.
83. Step 5 is not in point.
84. At step 6 I have to consider what reduction should obtain for UKA's guilty plea. I have read and considered their lengthy initial statement under caution which for all intents and purposes denies wrongdoing, with an implication that it was others who were at fault, including in particular KD. This is to say the least most unattractive, and is rightly described by the prosecution as a

deeply unworthy document.

85. I note, however, in this regard that that stance was adopted when their previous senior management team and previous legal team were in place, and that it has been expressly disavowed by the current CEO who, through Mr Antrobus KC has expressed profound, and I accept, very sincere regret for these events.

86. As I have already observed, UKA entered not guilty pleas to both counts in the indictment at the first hearing in March 2025 and it was not until February this year that they pleaded guilty to the offence of corporate manslaughter. Whilst I acknowledge the complexity of the case, in my judgement it is quite unrealistic to suggest, as was put forward in UKA's written submissions, that a discount of 25% is appropriate since it is clear from the Guidelines that deal with reduction in sentence for guilty pleas that such a discount is only apposite where a guilty plea is tendered at the PTPH, which was not the position here. The prosecution have submitted that the discount should be in the region of 15 to 20%. I agree with this and will take around the median figure.

87. In considering what starting point I should adopt, I cannot avoid taking account of the very significant fact that the background to the events on 11th July 2017 is not a one off failing in so far as these cages are concerned but rather one which had obtained over several years and in addition the failings were various, i.e. not just limited to the failure in relation to the use of the base plates.

88. In my judgment, in the very first instance I am required to take as the starting point a figure based on this being a medium organisation.

89. It is submitted, however, under step 3 of the guidelines, that by reason of UKA's impecuniosity and particularly the ringfencing of £8m of their income, to which I have already referred, that I should take as a starting point the figure for a small organisation, namely, £540k.

90. I do not consider that the justice of the case entitles me to go that far, having regard to the extent and duration of UKA's failings, but I am prepared to take as a starting point the figure of £800k which is of course a very substantial reduction on the starting point for a medium organisation and well within the category range for a small organisation.

91. At step 2 I reduce that figure, to take account of the mitigation, to £700k.

92. At steps 3 and 4, which I shall take together, given that they involve an element of overlap I am prepared to discount that figure by 40%, leaving a sum of £420K

93. From that figure I propose to allow a figure in the region of 17% discount for the plea, making an overall sum by way of a fine of £350k.

94. Costs, 44k.

95. Surcharge £170.

96. Above amounts to be paid quarterly commencing 1/7/26 over 6 years, i.e. £16,416.66 per quarter.

97. Count 4 to be marked, pleaded guilty to alternative offence.

98. Time to pay.