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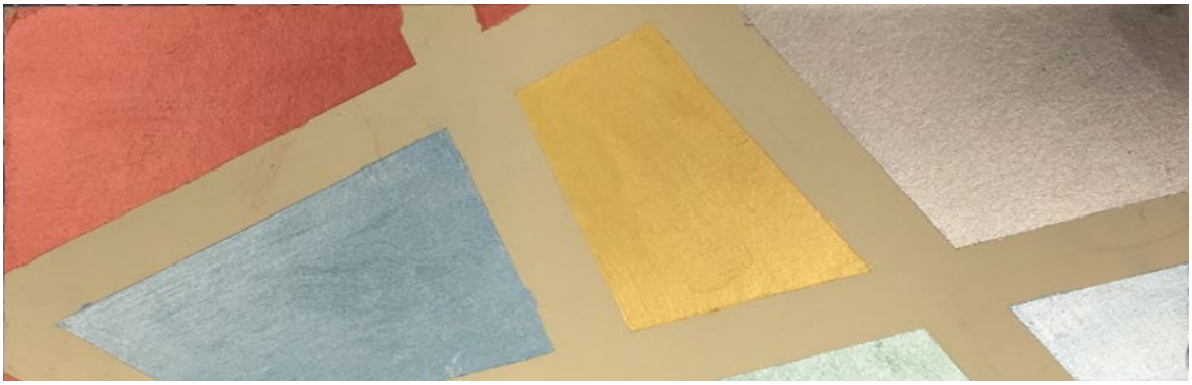

Welcome to the December 2025 Mental Capacity Report. Highlights this month include:

(1) In the Health, Welfare and Deprivation of Liberty Report: holding the risk in medical treatment cases; capacity to marry under the spotlight; and mental health conditions, cancer investigation and capacity;

(2) In the Property and Affairs Report: the general costs rule in property and affairs cases under pressure, and a guest post on appointeeship;

(3) In the Practice and Procedure Report: fact-finding in the Court of Protection and recommendations about mediation in medical treatment disputes;

(4) In the Mental Health Matters Report: progress of the Mental Health Bill, community mental health services under pressure and a new website with Nearest Relative resources;

(5) In the Children's Capacity Report: brain stem death testing and procedural fairness, and children in complex situations at risk of deprivation of liberty;

(6) The Wider Context: suicide prevention and assisted dying / assisted suicide;

(7) In the Scotland Report: questionable guardianship.

We have also updated our unofficial update to the MCA / DoLS Codes of Practice, available here.

You can find our past issues, our case summaries, and more on our dedicated sub-site here, where you can also sign up to the Mental Capacity Report.

We will be taking our usual break for the January report, but will be back in February; any urgent things requiring dissemination will be available via Alex's website. In the meantime, for a gentle provocation, you may care to watch this 'in conversation with' between Alex and Professor John Coggon as to whether mental capacity law is, in fact, law.

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The picture at the top, "*Colourful*," is by Geoffrey Files, a young autistic man. We are very grateful to him and his family for permission to use his artwork.

Contents

Short note: fact finding in the Court of Protection

In *Nottinghamshire County Council v SV & Anor* [2025] EWCOP 37 (T3), Lieven J has provided a helpful recap of the approach to the question of when it is necessary to carry out a fact finding hearing in the context of Court of Protection proceedings.

As she noted:

> *48. Finding of fact hearings are relatively rare in Court of Protection cases. The need for them was considered by Munby P in **Re AG [2015] EWCOP 78** at [29]-[31] where he confirmed that, unlike in care proceedings in relation to a child, there is no requirement to establish "threshold" in the case of proceedings in relation to an adult in the Court of Protection.*
>
> *49. Given that there is no threshold requirement in the MCA the question arose as to whether and when factual findings would be necessary. The former President expressly endorsed the pre-MCA 2005 decision of Wall J (as he then was) in **Re S (Adult's Lack of Capacity: Care and Residence) [2003] EWHC 1909 (Fam)** at [18] and [21] (emphasis added):*
>
> > *"18 … I agree that there must be good reason for local authority intervention in a case such as the present. Equally, **if there are disputed issues of fact which go to the question of Mr S's capacity and suitability to care for S, the court may need to resolve them if their resolution is necessary to the decision as to what is in S's best interests.** Findings of fact against Mr S on the two issues identified in para [16] would plainly reflect upon his capacity properly to care for S. But it does not follow, in my judgment, that the proceedings must be dismissed simply because the factual basis upon which the local authority instituted them turns out to be mistaken, or because it cannot be established on the balance of probabilities. **What matters (assuming always that mental incapacity is made out) is which outcome will be in S's best interests. There will plainly be cases which are very fact specific. There will be others in which the principal concern is the future, and the relative suitability of the plans which each party can put forward for both the short and long-term care of the mentally incapable adult.** The instant case, in my judgment, is one of the cases in the latter category.*

*21 Whilst I acknowledge that in a relatively untried jurisdiction there are dangers in too relaxed an approach to historical issues, I am unable to accept the proposition that the approach to best interests is fettered in any way beyond that which applies to any judicial decision, namely that it has to be evidence based; that it excludes irrelevant material; and that it includes a consideration of all relevant material. In a field as complex as care for the mentally disabled, a high degree of pragmatism seems to me inevitable. **But in each case, it seems to me that the four essential building blocks are the same. First, is mental incapacity established? Secondl y, is there a serious, justiciable issue relating to welfare? Thirdly, what is it? Fourthly, with the welfare of the incapable adult as the court's paramount consideration, what are the balance sheet factors which must be drawn up to decide which course of action is in his or her best interests?"***

*In **An ICB v G & Ors [2024] EWCOP 13** Hayden J held at [22]-[23]:*

*"Fact-finding hearings at Tier 3 in the Court of Protection are extremely rare. Junior Counsel in this case tell me that they are conducted more frequently at Tier 1 and 2, especially at Tier 2. I have been surprised to hear that. I can see no obvious reason why this should be the case. For my part, I do not think that in this sphere of law, they have quite the same practical utility that they can have in the Family Court. In the Court of Protection, the range of welfare options for P is frequently very limited and unlikely to vary very much in response to a shifting factual matrix. In determining whether a fact-finding hearing should be convened, **Judges must consider, rigorously, what real purpose it is likely to serve i.e., from the perspective of informing decisions relating to P's welfare.** Such hearings are inevitably adversarial and invariably generate further hostility. This is inherently undesirable. Delay in reaching conclusions is inimical to P's best interests. In a very pressing and literal way, time is often not on P's side. Delay can only be justified if it is identifiably purposeful … **However, I am satisfied that the gravity of the allegations here and the nature of the family's responses has made such a hearing unavoidable. It has clear resonance for the central welfare issues i.e., as to where G will live and whether or to what extent it will be in her best interests further to promote her relationship with her family.** This disagreeable truth, I very much regret to say, must be confronted.*

*As I have intimated above, **fact-finding hearings in the Court of Protection, as in the Family Court, require tight judicial control and an unswerving focus both on their scope and ambit as well as on purpose…" [emphasis added]***

*50. Cobb J (as he then was) considered the need for fact finding hearings in CoP in **LBX v TT [2014] EWCOP 24** at [44]-[51]. He referred to the overriding objective in the Court of Protection Rules to deal with cases justly, expeditiously and fairly [44] and the duty in rule 5 to actively manage cases, including considering the proportionality*

of the costs incurred. Cobb J then went on to apply the caselaw on fact finding in Children Act 1989 cases by analogy, see [46] to [51].

51. I agree with Cobb J that the issues that a judge in the Court of Protection will have to consider in deciding whether to order a fact-finding hearing are similar, although not precisely the same, as those in the Family Court when deciding the same question.

*52. In the context of Children Act 1989 cases there are some well established tests for whether a fact finding hearing should be directed, as set out by the Court of Appeal decision **Re H-D-H (Children)** [2021] 4 WLR 106, which reiterated the principles espoused in **A County Council v DP** [2005] 2 FLR 1031, at [22] Peter Jackson LJ said;*

> *22. The factors identified in Oxfordshire should therefore be approached flexibly in the light of the overriding objective in order to do justice efficiently in the individual case. For example:*
>
> *(i) When considering the welfare of the child, the significance to the individual child of knowing the truth can be considered, as can the effect on the child's welfare of an allegation being investigated or not.*
>
> *(ii) The likely cost to public funds can extend to the expenditure of court resources and their diversion from other cases.*
>
> *(iii) The time that the investigation will take allows the court to take account of the nature of the evidence. For example, an incident that has been recorded electronically may be swifter to prove than one that relies on contested witness evidence or circumstantial argument.*
>
> *(iv) The evidential result may relate not only to the case before the court but also to other existing or likely future cases in which a finding one way or the other is likely to be of importance. The public interest in the identification of perpetrators of child abuse can also be considered.*
>
> *(v) The relevance of the potential result of the investigation to the future care plans for the child should be seen in the light of the s. 31(3B) obligation on the court to consider the impact of harm on the child and the way in which his or her resulting needs are to be met.*
>
> *(vi) The impact of any fact finding process upon the other parties can also take account of the opportunity costs for the local authority, even if it is the party seeking the investigation, in terms of resources and professional time that might be devoted to other children.*
>
> *(vii) The prospects of a fair trial may also encompass the advantages of a trial now over a trial at a possibly distant and unpredictable future date.*
>
> *(viii) The justice of the case gives the court the opportunity to stand back and ensure that all matters relevant to the overriding objective have been taken into account. One such matter is whether the contested allegation may be investigated within criminal proceedings. Another is the extent of any gulf between the factual*

> *basis for the court's decision with or without a fact-finding hearing. The level of seriousness of the disputed allegation may inform this assessment. As I have said, the court must ask itself whether its process will do justice to the reality of the case.*
>
> *23. These are not always easy decisions, and the factors typically do not all point the same way: most decisions will have their downsides. However, the court should be able to make its ruling quite concisely by referring to the main factors that bear on the individual case and identifying where the balance falls and why. The reasoned case management choice of a judge who approaches the law correctly and takes all relevant factors into account will be upheld on appeal unless it has been shown that something has gone badly wrong with the balancing exercise.*

53. It is also relevant to consider the tests set out by the Court of Appeal for holding fact finding hearings in private Family Law cases in ***K v K*** *[2022] EWCA Civ 468 at [66]:*

> *"At the risk of repeating what has been said at [37] in Re H-N and at [41] above, the main things that the court should consider in deciding whether to order a fact-finding hearing are: (a) the nature of the allegations and the extent to which those allegations are likely to be relevant to the making of the child arrangements order, (b) that the purpose of fact-finding is to allow assessment of the risk to the child and the impact of any abuse on the child, (c) whether fact-finding is necessary or whether other evidence suffices, and (d) whether fact-finding is proportionate."*
>
> *54. In my view the overall approach to whether or not to hold a fact finding hearing is analogous between Children Act cases and Court of Protection cases.*

Summarising her conclusions, Lieven J directed herself that:

> *55. The facts which are sought to be found must have a direct impact on the welfare decisions that need to be made in respect of P. The fact finding must be "necessary" for the determination of those welfare decisions. The fact finding exercise must be proportionate to the issues that need to be determined. In determining proportionality, the likely cost to public funds, the time taken and the impact of delay on P are all relevant considerations.*

Applying that approach to the complex factual matrix before her, in proceedings which had become extremely protracted, Lieven J had little hesitation in concluding that there was no need to hold a fact finding hearing in circumstances where:

> *56. On the issues in this case, as they now stand, it is neither necessary nor proportionate for a fact finding exercise to take place. There are two matters for determination about SV's best interests under the MCA 2005 – where should SV live, the care and support he receives and what contact should he have with MB* [his husband]. *It is also important to have closely in mind that SV and MB are married and, therefore, any order that requires them not to live together or limits/prevents their contact, is an interference in their Article 8 ECHR rights (the right to family life). However, Article 8 is a balanced right, and an*

interference can be justified under Article 8(2).

57. Critically here, SV has made it entirely clear that his wish is to remain living at Option 4. In the light of those clearly expressed and consistent wishes it is inconceivable, quite apart from the safeguarding issues, that any Court would order him to leave Option 4 and live with MB. Albeit extremely late in the day, MB now accepts that there is not going to be an order of the Court of Protection that SV live with or be cared for by him. Therefore, no fact finding exercise is necessary for the determination of that issue.

58. In respect of contact, again, the answer lies to a considerable extent in SV's wishes and feelings. In principle, the Court could order that a married couple, where one party lacks capacity, cannot have contact with each other. However, that would be a highly intrusive order where the Court would have to consider justification very carefully. If contact can be managed safely, so that SV's physical, psychological and emotional well-being can be protected, and SV wishes for some contact, then in my view the correct approach is to seek to facilitate such safe contact.

59. Albeit in quite a limited and very cautious way SV appears to want to at least try some contact with MB. He spoke to me about some form of "remote" contact first, and then maybe seeing MB once or twice per month. So long as this can be facilitated in a way that gives SV the time and space to process the experience and then be in a position to express his wishes and feelings, in my view it is in his best interests to test out some limited contact.

60. The parties have now agreed a Contact Plan that leads from some indirect contact, in the form of either cards or letters or voice notes, to trialling supervised contact if it appears that is what SV wishes. If this all goes well and after being given time SV wishes to continue with contact, then there can be a gradual build up of contact. The Contact Plan includes clear expectations upon MB about his behaviour both to SV, but also to the professionals who work with SV and who will supervise contact. There are also a number of topics which MB has agreed not to discuss with SV, such as where SV lives and the ownership of some jewellery which seems to be disputed.

61. It may be that the Contact Plan fails and either SV makes clear that he does not wish to continue, or MB finds it impossible to manage his behaviour during the implementation of the Plan. However, given that SV and MB are married, and SV's apparent wishes, a failure to at least try to re-establish contact would not be justifiable under Article 8(2).

62. In determining that no fact finding hearing was necessary here I have taken into account; (1) SV's recently expressed apparent wish to have some contact with MB; (2) the fact that such contact can be managed safely and in a way that fully protects SV through the Contact Plan; (3) that a fact finding hearing would take two more days of the very limited time available for Court of Protection hearings at Tier 2 level; (4) the disproportionate cost in public funds given the very limited issues that actually needed to be determined and the fact that all the lawyers in the case are paid in some way by public funds.

63. Therefore, I will order that SV continue to live and receive care and

support at Option 4 and that contact with MB is progressed in accordance with the Contact Plan.

Comment

This is a characteristically no-nonsense decision from Lieven J, and a helpful summary of the case law. It may be time for a Practice Direction to crystallise the case law into clear guidance which does not require local authority (and other) lawyers to ferret about on Bailii or the Court of Protection Handbook (other textbooks are available) to work out the approach to take. That Practice Direction could also (optimistically) seek to provide guidance about what to do when a fact finding hearing *is* required as regards moving to what is a very different mode of preparation and analysis to that which is required in other types of hearings before the Court of Protection.

In the meantime, and by way of example of a fact-finding hearing (in a s.21A application) see *Denbighshire County Council v P* [2025] EWCOP 43, a case from September 2025 which has only recently appeared on Bailii. It is of note both as a relatively rare example of a reported s.21A application, and also because the 'facts' which needed to be found were predominantly facts about the qualities of P's mother, as opposed to facts about incidents that had (or had not) taken place.

Court User Group meeting minutes and 'Town Hall' webinars

The most recent Court of Protection User Group took place on 22 October 2025. We note the following points of interest regarding court operation and practice:

- 88% of Court of Protection work is administered through the central London hub, and 12% is administered through the regions.
- Digital applications currently have a 13-day acknowledgment of receipt timeframe. Paper applications are being acknowledged within the target of 5 days. Final property and affairs orders are issued on day 8 for paper applications and day 11 for digital.
- Baroness Levitt KC is now the minister with responsibility for the MCA.
- DHSC consultation on LPS due to launch early next year. The DHSC is looking to publish a revised code of practice, including developments in any case law, terminology, organisational structure changes. Responses from the consultation will also be used in the updated code and any updated LPS regulations. There is no firm date for the start of LPS. It has not yet been determined whether the new consultation will be on a new code of practice, or the same code of practice which was previously consulted on.
- COP9s to vacate hearings need to be filed in good time, and in accordance with the specific directions made. The Court does not have the resources to ensure that late applications are dealt with as immediately as applicants may wish if they leave it to the last minute.
- COPDOL11s:
    - There has been a 21% increase in the number of 'Maybe' orders being made in respect of COPDOL11 applications. It was noted by attendees that many of the 'Maybe' orders related to the court's declining to re-appoint a Rule 1.2 representative who had previously been used on the basis that the person was too closely involved in P's care. Senior Judge Hilder noted that listing a hearing would not be the default response to failure to identify a R1.2 representative. The approach of the

court is to be mindful of the purpose of Rule 1.2 representation - to monitor implementation and raise concerns with the court. The person tasked with this responsibility needs to have sufficient objectivity, which is difficult if they are themselves responsible for implementing the measures which amount to deprivation of liberty. Where a family member is not appointed on that basis, it is not a criticism of that family member. Rather, it is recognition that they are already doing a difficult job. Sometimes, during the pandemic when outside contacts were severely limited, such family appointment was made as the only possible option but that is not the general approach now we have returned to more open times. Senior Judge Hilder emphasised that the court needs to be satisfied that a person proposed as Rule 1.2 will be able to carry out the functions of the role and referred users to the judgments of Charles J spelling this out. Wherever the applicant proposes an individual as R1.2 representative, it would help the court if explanation is provided as to why it is considered that this individual is suitable for the role.

- Senior Judge Hilder confirmed that an additional, fourth clause has been included as standard in 'final' orders, requiring the Rule 1.2 rep to notify the court if the local authority does not make the review application in good time. The court does not have the IT ability to monitor and chase when review applications should be made. The express inclusion of the expectation is really intended to alert everyone involved in the case to the need for review. If a matter comes back to court (which may happen for a number of reasons) without a review application having been made as directed, the court will ask why and would be unlikely to re-appoint the same Rule 1.2 representative.

The Court of Protection also held two 'Town Hall' Webinars in September, one relating to welfare and one relating to property and affairs. In the welfare webinar, the court noted the following points of interest:

- At present the only welfare applications which may be filed digitally are s16 urgent/emergency applications, COPDLA and COPDOL11 applications. Non-urgent S16 applications and personal welfare deputyship applications must still be made on paper.

- Applications for welfare deputyship should clearly identify what decisions need to be made, and why a deputyship appointment is needed.

- Applications to vacate a hearing require the filing of a COP 9 application, draft order, and confirmation of consent from all parties. It helps the staff administer these applications if the e-mails of consent are provided *with* the application and specify which party's consent is being given ('On behalf of the Second Respondent, I consent to …') The application should be made *within* any timescale set by previous directions. Late applications are likely to be ineffective. It should *not* be assumed that a hearing is vacated simply because an application for that has been made. Matters remain listed for hearing unless and until an order vacating the hearing is made. Applications to vacate may be refused.

- The attendance of the ALR at hearings is expected, and the appointment is a personal one. If the ALR cannot attend a hearing, they should inform the Court by filing a COP9

application, giving reasons and an explanation of how it is proposed that P will be represented at the hearing.

At the property and affairs webinar, the court noted the following points of interest:

- The court is gradually transitioning to digital processes. Property and affairs deputyship applications – both first appointment and replacement appointments - should be made digitally. At present, all other property and affairs applications should be made on paper. It is intended that new trustees applications will shortly become digital. Local authorities *can* obtain PBA numbers to make digital applications; lay applicants can pay by card.
- Where a local authority applies for the appointment of a panel deputy, as opposed to seeking its own appointment, the application should clearly explain *why*. If the local authority is already appointed as deputy, its authorisations stand until a new order is made. Where the conclusion of the application is that a panel deputy is appointed, a copy of the order should be issued by the court to *both* the appointed deputy and the applicant local authority.
- Terminating tenancies and selling properties:
    - Where the authority to enter into/terminate a tenancy is sought as part of a deputyship application, the application should include an explanation of why this is considered to be in the best interests of P. If the tenancy is currently P's home, the court is unlikely to include authority to terminate that tenancy. The wish to avoid having to make another application in the future does not allay concern to ensure that P's living arrangements are appropriately secured. If the application to enter into/terminate a tenancy is made as a free-standing application, evidence about P's living arrangements will be required – in particular if there is a deprivation of liberty and if so whether it is authorised.
    - Application for authority to sell a property may be included in a deputyship application or made as a free-standing application. Explanation should be given as to whether the property is or was P's primary home. The court will require information on P's current living arrangements - whether they involve deprivation of liberty, and if so whether it is authorised - to avoid shutting down welfare options. Delays in DoLS paperwork need not delay deputyship applications. The court may appoint a deputy but defer the decision as to authority to sell the property pending further evidence. The court is unlikely to grant *conditional* sale authority.

Short note – penal notices and contempt

Buzzard-Quashie v Chief Constable of Northamptonshire Police [2025] EWCA Civ 1397 is a frankly extraordinary case on the facts. It has nothing, per se, to do with capacity matters, but the Court of Appeal did make a number of important observation about the relevance of the presence or absence of a penal notices on an order in the context of contempt proceedings.

In considering whether it is possible to find a person in contempt of an order which does not have a penal notice, the Court of Appeal found that *"there are not two different tiers or classifications of court orders, namely those with*

a penal notice, and those without. If there were, this would mean that the former must be obeyed because the court would have powers regarding non-compliance, but it would lack those powers for the latter. If that were the case, compliance with the latter could potentially become of the 'nice but not essential' type" (paragraph 84). Penal notices are standard for some kinds of orders, or may be used "*after a breach, or series of breaches, makes it necessary that such a notice is required*" (paragraph 85). The Court of Appeal agreed with dicta in *Serious Organised Crime Agency v Hymans and others* [2011] EWHC 3599 (QB) at paragraph 12 that "*the lack of penal notice was not fatal to the application to commit, as the respondent in the case clearly knew the consequences of the breach of the order, and it would not be in the interests of justice to allow him to escape those consequences simply because no penal notice had been endorsed on the face of the order*" (paragraph 86). The Court of Appeal was very clear on this point at paragraph 87).

> *'f someone can be committed to prison for contempt of court in respect of breach of an order without a penal notice – and it is clear that the court has a discretion to do this, admittedly used in rare circumstances – then it cannot logically be a bar to a finding of contempt for breach of an order if there were no penal notice attached. There is no such procedural or substantive bar. The penal notice is relevant to sanction, not to any finding of contempt being made.'*

However, the Court of Appeal found that the existence of a penal notice was relevant to committal proceedings, and notice of this will usually be necessary for a court to decide to imprison a person. However, at paragraph 90, the Court of Appeal found that "[i]*t is not a necessary prerequisite or condition precedent to imprisoning someone for contempt that there be a penal notice, and there may be some unusual cases where it is fair and just (**SOCA v Hyman** is an example) to imprison someone for breach of an order even in the absence of a penal notice."*

Specifically in relation to public bodies, the Court of Appeal observed that, given that there was an expectation that orders made against public bodies will be obeyed: "[a] *finding of contempt can be made against a Secretary of State, a minister or a Chief Constable if there has been a failure to obey an order of the court, and it is not necessary for there to have been a penal notice on such an order for such a finding to be made*" (paragraph 94).

Research corner: Mediation of medical treatment disputes: a therapeutic justice model end of project report

Jaime Lindsey, Gillian Francis and Margaret Doyle have published Mediation of medical treatment disputes: a therapeutic justice model end of project report. The project starts with the premise that one of the difficulties in studying mediation is its confidential nature, leading to difficulties in accessing mediations, and participants understanding its potential. The project considered medical treatment disputes relating to both children and adults, and typically in cases where the person at the centre of the dispute was very unwell and not able to directly participate in the mediation. The work considered 'reported case law, theoretical analysis of therapeutic justice and best interests, and empirical research with mediation participants.' Borrowing from the summary:

The research found:

1) that mediation could be a therapeutic process where it was designed to be flexible, participatory, less adversarial, voluntary, collaborative and enhance participant

communication and understanding and we suggest that mediation's use in health and care disputes should ensure these features are protected and promoted through mediation design;

2) that some participants were closed to mediation and resolution, cynical about mediation and mediators (sometimes family members who distrusted the mediator's independence of the HCPs), and felt process coercion to participate (usually paediatric HCPs who saw it as a requirement from the court), attitudes which could be seen as anti-therapeutic;

3) that mediation can cause delay in resolution, but that there was no evidence that mediation led to agreements that undermined the patient's best interests;

4) that religious views of the parties were not a barrier to mediation and that, rather, religious support in mediation can be beneficial for parties.

The report made a number of recommendations regarding health and care disputes:

- Increased Transparency Surrounding Mediated Disputes: The report recommends including a question on court applications as to whether mediation has been attempted, and the data be collated and published in Family Court Statistics. The report also recommends that judges record in published judgments when a case has been mediated.
- Publication of Anonymised Details of Mediated Cases: The report recommends that public bodies (specifically NHS Trusts, primary care organisations and local authorities) and mediation providers should consider publishing anonymised details of mediated cases they are involved in.
- Representation of the Child or Adult Subject: The report recommends that the adult or child who is the subject of the mediation should have their views represented at the mediation either through direct or indirect participation, with an obligation on the mediation ensure that the patient's wishes are represented at the mediation.
- Educational Materials and Information Sessions: The report recommends the development of educational materials regarding mediation which can be shared with potential participants in advance of mediation's use, and the MOJ implements a scheme for Mediation Information and Assessment Meetings (MIAM) for health and care disputes, similar to those provided in other areas of the family courts. However, this ought not be mandatory as it would undermine the benefits of the voluntariness of mediation.
- Guidance published about mediation's use in health and care disputes: The report recommends the development of best practice guidance on mediation for health and care disputes for adults and children.

Jaime and Gillian have also published an article in the Medical Law Review entitled Compromise, coercion, and delay: best interests decision-making in mediation of paediatric medical treatment disputes, available here.

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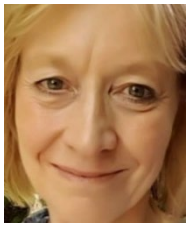

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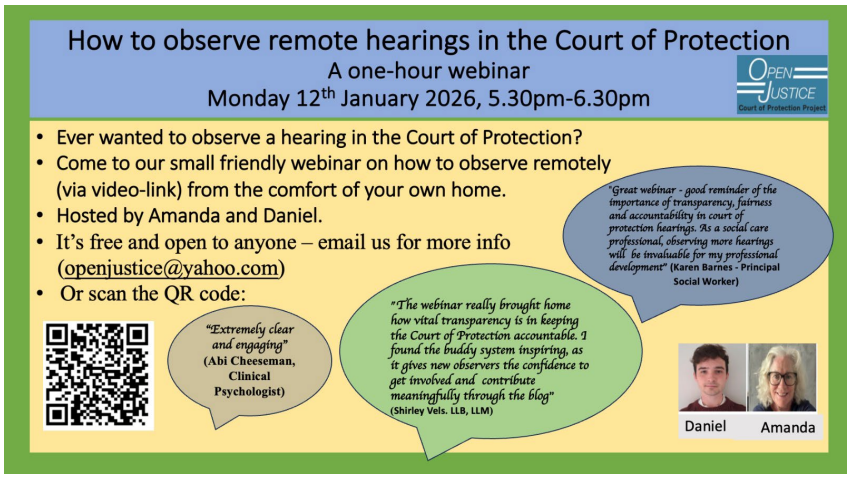
Conferences

Members of the Court of Protection team regularly present at seminars and webinars arranged both by Chambers and by others.

Alex also does a regular series of 'shedinars,' including capacity fundamentals and 'in conversation with' those who can bring light to bear upon capacity in practice. They can be found on his website.



Advertising conferences and training events

If you would like your conference or training event to be included in this section in a subsequent issue, please contact one of the editors. Save for those conferences or training events that are run by non-profit bodies, we would invite a donation of £200 to be made to the dementia charity My Life Films in return for postings for English and Welsh events. For Scottish events, we are inviting donations to Alzheimer Scotland Action on Dementia.

Our next edition will be out in January. Please email us with any judgments or other news items which you think should be included. If you do not wish to receive this Report in the future please contact: marketing@39essex.com.

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