



Welcome to the March 2018 Mental Capacity Report. A combination of the January report coming out late in the month, the shortness of February, and the diversion of most of the editors to the Supreme Court in the *Y* case, means that we have had no February report, but are now firmly back on track. Highlights this month include:

(1) In the Health, Welfare and Deprivation of Liberty Report: *Re Y* update, constructing a best interests decision in practice and the JCHR inquiry into DOLS reform;

(2) In the Property and Affairs Report: *Banks v Goodfellow* resurgens, trust corporations and appointees under the microscope;

(2) In the Practice and Procedure Report: Baker J on Charles J and Sir James Munby, children, confinement and judicial authorisation and the problems of litigants in persons;

(3) In the Wider Context Report: the MCA Action day, immigration detention and access to court for those with impaired capacity and international developments of relevance to capacity law reform;

(4) In the Scotland Report: the Scottish Government consultation on the Adults with Incapacity Act, and a round-up of recent relevant case-law;

You can find all our past issues, our case summaries, and more on our dedicated sub-site [here](#), and our one-pagers of key cases on the SCIE [website](#).

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

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Adults with Incapacity reform

Consultation by Scottish Government on proposals for reform of the Adults with Incapacity (Scotland) Act 2000 (“2000 Act”) opened on 31st January 2018 with issue of the consultation document “Adults with Incapacity Reform” (“the Document”). The Document and link for online responses are [here](#). The consultation will close on 30th April 2018.

Everyone with an interest in Scotland’s existing adults with incapacity (“AWI”) regime and its operation should read the Document in full, and consider whether they can contribute to the process of review and reform of AWI law and practice by responding. We accordingly offer here only a brief outline of the content, followed – at this relatively early point in the process of consideration and discussion – by some limited general comment.

The Document commences by acknowledging that at the time when it was passed the 2000 Act “was widely acclaimed as ground breaking law”. It then immediately focuses upon *HL v UK*, (2005) 40 EHRR 32 (the “Bournewood case”), and ensuing developments leading to the Scottish Law Commission Report on Adults with Incapacity (Report No 240, 2014) which proposed a regime intended to ensure

compliance with Article 5 of the European Convention on Human Rights (“ECHR”), and the ensuing Scottish Government consultation in 2016. It reports the main themes emerging from that consultation in two categories. Firstly, regarding compliance with the deprivation of liberty provisions of ECHR Article 5; there is a compelling need to ensure a lawful process for persons who may need to be deprived of their liberty in community or hospital settings, and who lack capacity to agree to such a placement; the Scottish Law Commission proposals would “result in a huge workload for an already pressurised system and workforce”; and any changes to the law should take place in the context of a wider revision of AWI legislation.

As to views on possible changes to AWI legislation, the Document reports that the “most popular areas for change” were a move to a form of graded guardianship; consideration for a change of jurisdiction for AWI cases from the sheriff court to a tribunal; creation of a short-term/emergency placement order that can be used at short notice; and consideration of changes needed to implement the UN Convention on the Rights of Persons with Disabilities (“UN CRPD”).

On the topic of “restrictions on a person’s liberty”, the Document offers a proposed definition of

significant restrictions on liberty. It proposes that significant restrictions are permissible if “a person seeks through words or actions to express their wish to be in a given place and to receive care and treatment in a given manner”; that if there is no consent but also no “apparent objection”, the restriction may be authorised by a grade 2 guardianship order (see below); and that if there is no consent and objection from the adult or other interested parties, the matter should be addressed by grade 3 guardianship. A valid power of attorney with relevant powers should be relied upon “to authorise a move to a setting where there may be significant restrictions on a person’s liberty”.

On the section 1 principles of the 2000 Act, the Document proposes a new principle: “There shall be no intervention in the affairs of an adult unless it can be demonstrated that all practical help and support to help the adult make a decision about the matter requiring intervention has been given without success”.

On powers of attorney, the Document proposes a need for clarity as to how and when a power of attorney should be activated. In the context of the deprivation of liberty proposals, it suggests that clarification is also needed as to the use of powers of attorney in situations that might give rise to restrictions on a person’s liberty. It is suggested that advance consent in the power of attorney document should suffice. The Document proposes creation of a role of “official supporter”, appointed by an adult capable of making such appointment. Views are sought as to how such a supporter might be appointed. A possibility suggested in the Document is for a power of attorney to contain an appointment of

a supporter, with the supporter registered in the same way as the attorney at present.

A chapter of the Document is devoted to capacity assessments, and asks whether consideration should be given to extending the range of professionals who can carry out capacity assessments for the purposes of guardianship orders.

By far the longest chapter of the Document is devoted to the topic of graded guardianship, and is linked to an ensuing chapter addressing the question of the forum for cases under AWI legislation. The graded guardianship proposals appear to follow closely the suggestions first mooted by the Public Guardian in 2011. There would be three grades. It would be envisaged that grade 1 would encompass the great majority of cases. Scottish Government proposes that application “will be made by a standard form which will be available online and can be completed by the applicant without the need for legal advice”. The applicant could select from “a wide range of welfare and financial powers”. Only where welfare powers are sought, a report would be required from a local authority social worker. The applicant would be required to complete an “OPG Guardian Declaration” on a form provided by the Public Guardian. It appears that no independent report would be required where property and/or financial powers are sought. In all cases, a single certificate of incapacity would be required. Intimation of the application would be the responsibility of the applicant.

The main trigger to lift applications from grade 1 to grade 2 would be a financial limit to be set by regulation. A trigger of £50,000 is suggested. The other principal trigger would be that the

adult is able to object and does so. Grade 2 would also apply in the event of other parties being in dispute, or if a restriction of liberty were to be proposed.

At grade 2, the same incapacity certificate and OPG Guardian Declaration would be required as for grade 1. If welfare powers were sought, there would require to be a report by a mental health officer rather than any social worker. There would still be no requirement for independent reporting in relation to property and/or financial powers, and intimation would still be the responsibility of the applicant. In addition to the above requirements, a medical report by a section 22 doctor (a medical practitioner approved as having special experience in the diagnosis and treatment of mental disorder) would be required if a significant restriction of liberty is proposed.

The application for a grade 3 guardianship would require the same application process as for grade 2. Grade 3 would be required only where the adult or any interested party disagrees with the application. The application would either be made initially at grade 3, or would be transferred from a lower grade. Any reference by OPG, a local authority or the Mental Welfare Commission following an investigation would be treated as a grade 3 application.

The maximum permitted duration of guardianship orders would be three years at grade 1, and five years at grades 2 and 3. The Document contains proposals for renewal procedures. It proposes the abolition of intervention orders. It proposes the possibility of corporate rather than individual guardians. It proposes that access to funds and management of residents' finances (under Parts 3 and 4

respectively of the 2000 Act) be transferred into the graded guardianship system.

Choice of forum for the AWI jurisdiction led to much debate in the law reform process leading to the 2000 Act. In the 2016 consultation, the Mental Health and Disability Sub-Committee of the Law Society of Scotland ("MHDC") proposed a unified tribunal dealing with mental health, AWI, and adult support and protection jurisdictions. It was expected that the Document would present models for retention of the sheriff court, or transfer of a tribunal, in the context of a system of graded guardianship. Instead, it proposes that the Office of the Public Guardian should be the forum for all grade 1 guardianships, and that the alternatives of sheriff court or tribunal should apply only to grades 2 and 3 cases. It sets out possible alternative models at those grades.

The Document contains provision for supervision and support for guardians (addressing welfare guardians and property and financial guardians separately), and brief proposals for support for guardians and support for attorneys. It contains proposals for an order for cessation of a residential placement, and creation of a short-term placement. It asks whether, in the event of the proposals in the Document being implemented, there would remain any need for the existing procedure under section 13ZA of the Social Work (Scotland) Act 1968.

The Document asks whether there should be legislative provision for advance directives, though it appears to address advance directives only in relation to healthcare, and not in the normal much broader modern sense.

As regards the scheme of authorisation for medical treatment under sections 47 – 50 of the 2000 Act, the Document proposes that the scope of the existing section 47 certificate be extended to enable the lead medical practitioner to authorise that an incapable adult patient can be prevented from leaving hospital whilst undergoing medical treatment (including diagnostic tests) for a physical illness. It is proposed that there would be no requirement for involvement of a mental health officer. The authority to treat would last 28 days, with the possibility of renewal and a limit (not specified) “on the number of times that this could happen without judicial involvement in the decision”.

On medical research, the Document asks whether: “Where there is no appropriate guardian or nearest relative, should we move to a position where two doctors ... may authorise ... participation ...?”. A subsidiary question is whether persons preparing powers of attorney should “be encouraged to articulate whether they would wish to be involved health research”.

A final question asks whether other matters within AWI legislation would benefit from review or change.

Comment

The grade 1 guardianship proposals would represent, for the first time in Scottish history, a substantial diminution in the rights, and respect for the status, of people with any form of cognitive impairment, in favour of bureaucratic convenience. When the subject of graded guardianship was first tabled by the Public Guardian in 2011, MHDC raised the obvious concerns expressed in a document of July 2012 available [here](#). Grade 1 as proposed appeared

clearly to be non-compliant with the requirement of ECHR Article 6 that: “In the determination of his civil rights ... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law”. Even more, that would appear to violate Article 8 rights. Throughout history, until now, and since long before ECHR, it has always been accepted that appointment of a guardian (however named) to an adult is a major step in relation to the rights of that adult requiring a judicial process, conducted with great care. Thus, following the introduction of statutory guardianship by the Mental Deficiency and Lunacy (Scotland) Act 1913, the standard text on that Act (bearing the title of the Act, by J Edward Graham, William Hodge & Company, 1914) stated: “... the responsibility put upon the medical practitioners who certify such cases, and upon the Sheriff who grants a judicial order for dealing with them, is a grave one”.

The Document does not even address the question of ECHR compliance, nor does it even address the preliminary issues raised in 2012 such as the lack of expertise of OPG in welfare matters. Especially at grade 1, in financial matters the proposals would appear to represent a “fraudster’s charter”: the applicant will seek financial powers by a tick-box exercise online, there will be no independent reporting and, contrary to all the various miscellaneous procedures under the 2000 Act, the applicant rather than OPG would be responsible for intimation. The process is expressly described in the Document as non-judicial, to the extreme extent of the use of the passive voice at the point of granting of a guardianship order, with no-one identified as responsible for making the order (and thus bearing the “grave responsibility”

identified over a century ago): “If there are no objections then the application may be granted after the 21 day period”.

It cannot be seen as other than discriminatory that the triggers for the somewhat greater safeguards of grades 2 and 3 would be (a) a financial level, apparently for welfare as well as financial applications, of a specified figure, and (b) the fact that the adult is able to object and in fact objects. It is irrelevant, apparently, that a lower figure than the threshold may represent an adult’s entire income and/or capital, and – contrary to all human rights norms – inability to consent is apparently to be equated with consent.

The Document appears to be based upon many fundamental misconceptions, and to contain contradictions and ambiguities. We have space for only a few examples. It is notable that none of the many consultation questions in relation to the proposed graded guardianship system seek responses from the viewpoint of adults who might be the subject of the procedure, and the safeguarding and promotion of their rights, including their basic rights under ECHR and UN CRPD.

In relation to UN CRPD, it is suggested on page 10 that: “The Scottish Government is committed to fully ratifying the UN Convention”. It is not within the competence of the Scottish Parliament to ratify such an international instrument, and in any event (as the Document itself acknowledges elsewhere) in 2009 it was ratified by the UK Government, on behalf of all UK jurisdictions. The task of the Scottish Parliament is to implement UN CRPD.

Chapter Eight commences with an assertion that UN CRPD “emphasises that every available support should be given to a person with a mental disability to maximise their decision-making ability”. Article 12.3 of UN CRPD requires States Parties “to provide access by persons with disabilities to the support they may require”, not just whatever happens to be available, and to provide it “in exercising their legal capacity”, meaning much more than making decisions. That narrowing also appears in misquotation of the 2000 Act: thus, section 1(6)(a) refers broadly to “acting”, not – as misquoted in the Document – to “acting on decisions”.

Of fundamental significance, on page 7 section 1(3) of the 2000 Act is fundamentally misquoted, by suggesting that “any action or decision taken should be the minimum necessary to achieve the purpose”. Crucially, under the 2000 Act it must be “the least restrictive option in relation to the freedom of the adult” consistent with the purpose of the intervention. Granting a guardianship order with the full safeguards of the present process would be likely to be substantially less restrictive in relation to the freedom of the adult than the proposed grade 1 procedure. It is possible that unless the rights of the adult were to be eroded to the extent of reducing the protections of the existing section 1 principles, grade 1 as proposed would never be implemented, as procedures less restrictive of the freedom of the adult would always be available.

Another misrepresentation of the present position under the 2000 Act is in relation to the concept of a “corporate guardian”. This topic was discussed in paragraphs 6.45 – 6.60 of the Scottish Law Commission Report No 151 on

Incapable Adults (1995) which led to the 2000 Act. The Commission clearly concluded that only an individual should be appointed as welfare guardian, with the one exception of provisions for the chief social work officer. Where the Document suggests on pages 45–46 that: “The chief social work officer will in practice delegate his functions”, the Act actually places a statutory responsibility upon the chief social work officer, if appointed guardian, to notify to all concerned “the name of the officer responsible at any time for carrying out the functions and duties of guardian”. That concession was made solely because chief social work officers would be likely to hold more guardianships than they could properly carry full responsibility for. The Document contains no equivalent requirement, in its proposals for corporate guardians, to make an individual responsible and to ensure the suitability and competence of the nominated individual. The only form of corporate financial guardianship envisaged in Report No 151 was the Public Guardian acting as financial guardian of last resort.

The most significant ambiguity in the Document is as to whether the bullet-point list elements on page 12 for determining a significant restriction on liberty apply as alternatives or cumulatively.

Contradictions include the assertion on page 27 that grade 1 guardianship “would be used for day-to-day welfare matters and for managing simpler financial affairs”, contradicted by, in the examples of powers on pages 29 and 30, in relation to welfare matters the wide powers to consent to “any medical treatment not specifically disallowed by the Act or procedure or therapy of whatever nature” and, in relation to financial matters, power to borrow money and

grant security, to receive or renounce any testamentary or other entitlements, to implement tax-planning or similar arrangements, and so forth. Another is the suggestion on page 51 that there should be “no discretion on OPG at grade 1 to make judicial-type decisions”, yet an anonymous official in OPG would carry the “grave responsibility” of making the essentially judicial decision to grant the guardianship order (that being the implication of the remarkable use of the passive voice in describing the actual act of granting the guardianship order, quoted above).

One trusts that significant proposals such as abolishing intervention orders will not have been made without a properly researched evidence base, in that case as to the uses to which intervention orders have in fact been put to date, presumably demonstrating (though this seems surprising) that none of them could have been equally well achieved by a guardianship, and that a guardianship order to such effect would not have been disproportionate. Evidence is also not disclosed in relation to assertions such as the following: “The significant number of cases where a full court process adds little value” (page 10); the implication in “powers that are absolutely necessary” (page 27) that unnecessary powers have been granted, and if so of what nature and to what extent, with demonstration as to how these might be better weeded out under the proposed system; vague assertions such as “We have often heard that in some situations the present guardianship process is too onerous” (page 27) and “We have been told of ...” (page 44).

The Document mentions the Essex Autonomy Project Three Jurisdictions Report, but does not

appear to incorporate any of the proposals in that report to achieve compliance with UN CRPD. It does not address many proposals for improvement of the 2000 Act made in response to the 2016 consultation. As regards forum, it suggests that there was a proposal to transfer AWI matters to the Mental Health Tribunal. The MHDC proposal was for creation of a new unified tribunal, to include also the adult support and protection jurisdiction, and of course – crucially – to ensure due and proper judicial determination of all AWI matters currently within the jurisdiction of sheriffs (the only proper alternative to that being that all such matters continue to be judicially determined by sheriffs).

Adrian D Ward

RH v RH, [2017] SAC (Civ) 31; 2018 S.L.T. (Sh Ct) 19

Many times in the Report (and previously in the Newsletter) I have wrestled with the many different possible connections between person and place, often under the title “Where am I?”. This case concerns a child, not an adult, but it introduces the two further concepts of nationality and “home court”. Subject to the important caveat that it does concern a child, the persuasive reasoning of the Sheriff Appeal Court may be found helpful in some adult cross-border situations.

In this case father, mother and child were all American citizens. Mother brought the child to Scotland and both acquired habitual residence in Scotland. On 15th April 2016, mother raised proceedings in Dundee Sheriff Court, seeking a residence order and an interim residence order in respect of the child, and interdict and interim interdict. Five days later, father commenced

proceedings in Tennessee for divorce, temporary injunction and a temporary restraining order. Following various further steps in procedure in the Tennessee court, by the time of the present case in Scotland the Tennessee court had granted decree of divorce, had designated mother as custodian and primary residential parent of the child, and had awarded supervised parenting to the father in terms of a parenting plan order. An appeal by the father was outstanding, but a defect in the Tennessee decree had been identified.

The mother applied to Dundee Sheriff Court for a residence order and an interim residence order, and for interdict and interim interdict. On the father’s motion, the sheriff sisted the Scottish proceedings on the basis that there were existing proceedings in Tennessee regarding the matters addressed in the mother’s application in Scotland, and it would be more appropriate for those matters to be determined in the Tennessee court. The sheriff’s conclusions were that (1) the Tennessee proceedings were further advanced, (2) ongoing proceedings in two jurisdictions risked a lack of certainty, (3) the mother’s residence in Scotland was precarious, as she had been issued with notice of curtailment of her leave to remain, and (4) the Tennessee court, as the party’s “home court”, was better placed to determine the child’s best interests.

The mother appealed to the Sheriff Appeal Court, which identified as the core issue the interpretation of section 14(2) of the Family Law Act 1986, and its application to the facts. Section 14(2) allows the court to sist proceedings, or (where the Hague Convention on the Civil Aspects of International Child Abduction

1980 applies) request an authority in another contracting state to assume jurisdiction, if (a) proceedings with respect to the matters to which the application relates are continuing outside Scotland; (b) it would be more appropriate for those matters to be determined in proceedings outside Scotland and such proceedings are likely to be taken there, and (c) (where that Hague Convention applies) the court should exercise its powers under Article 8 of that Hague Convention. Applying a dictum of Lord McCluskey in *Hill v Hill*, 1991, SLT 189, the Sheriff Appeal Court considered that the court had discretion as regards both element (a) and element (b) above. The Sheriff Appeal Court however concluded that it should “proceed on the basis that the relevance of the welfare of the child as the paramount consideration is in the context of which court will decide what orders shall be made, rather than any substantive decision as to what orders ought to be made”.

Granting the appeal, the Sheriff Appeal Court held that the sheriff had failed to have sufficient regard to the habitual residence of the child in Scotland. Habitual residence weighed heavily where the child’s welfare was the paramount consideration. The court with jurisdiction based on the child’s present location was likely to be the most appropriate forum for hearing of evidence, even if any decision might be transient due to uncertainty over the child’s future location. Moreover, cases involving children required prompt progression: so long as the child remained resident in Scotland, a determination in Scotland might be required to enforce any decision of the Tennessee court. Accordingly, in practical terms it would be in the overall interests of justice for the proceedings in Dundee Sheriff Court to continue.

Hypothetically substituting for the child in this case an adult lacking sufficient capacity to make an independent decision about travel and residence, it might be that such an adult would be held to have acquired and not lost habitual residence in the United States. Even in that situation, however, some of the grounds on which the Sheriff Appeal Court allowed this appeal might still carry weight.

Adrian D Ward

Glasgow City Council v Scottish Legal Aid Board, [2017] CSOH 155; 2018 S.L.T. 115

In this case, Lord Woolman, in the Outer House of the Court of Session, refused a petition by Glasgow City Council seeking to quash a decision by Scottish Legal Aid Board not to provide information to the Council by an applicant for Legal Aid (the applicant for Legal Aid being referred to in this note as “the applicant”) in support of a request by the applicant for review of a refusal of Legal Aid. SLAB refused to provide the information without the applicant’s consent. The applicant did not consent. The application sought Legal Aid to reclaim an unsuccessful petition by the applicant for judicial review of assessments by the Council that it would be appropriate to transfer the applicant’s “elderly and infirm” mother from care in her own home to care in a residential establishment. The court in the present case held that SLAB was entitled to refuse to supply the information in question in terms of the clear wording of section 34 of the Legal Aid (Scotland) Act 1986.

For the full grounds upon which the court arrived at that decision, see the [decision](#) itself. We refer to it here principally for the following point. The

lady at the centre of the proceedings had granted a power of attorney in favour of her son. The Legal Aid certificate was granted in name of the mother. The Council contended that SLAB should have granted Legal Aid to the son as attorney. Lord Woolman disagreed. He commented that the son “is using the power of attorney to conduct the litigation on her behalf and in her interests. It seems unduly formalistic to require the Board to endorse the Legal Aid certificate to note his interest as her representative”. This is consistent with the more general point that where an adult engaged in litigation has an appointee under any provisions of the Adults with Incapacity (Scotland) Act 2000 who actually conducts the litigation on the adult’s behalf, it is the adult – and not such appointee – who is the party to the litigation, in whose name it should be conducted (see for example *Secretary of State for Work and Pensions v (First) The City of Glasgow Council (Second) IB* [2017] CSIH 35, described in the [June 2017 Report](#)) and in whose name ancillary matters such as a grant of Legal Aid should be applied.

Adrian D Ward

Q v Glasgow City Council, [2018] CSIH 5; 2018 S.L.T. 151

The son and attorney referred to in the preceding item did, on his mother’s behalf, appeal to the Inner House the decision of the Lord Ordinary dismissing his petition challenging the lawfulness of assessment decisions by Glasgow City Council. The Inner House refused the appeal. The fact that the mother’s impairments put her at particular risk of falling might have supported the proposition that she required one-to-one care, did not mean that the Council’s conclusion that her needs called for a less

intensive degree of care than hitherto was irrational or perverse. The Council was entitled to conclude that the lady’s needs were not so different from those of other elderly persons at risk of falls, that while 24-hour care might be necessary, that could be provided in a care home without one-to-one supervision and attention.

We described the case at first instance in the [November 2016 Newsletter](#). As the appeal was successful, we shall not repeat that description of the circumstances and of the decision of Lord Boyd at first instance. For the discussion at appeal, and the grounds upon which Lord Boyd’s decision was upheld, see the appeal decision. Here we would simply observe that upon appeal, as at first instance, only limited consideration was given to the mother’s views or as to whether she should in fact be removed from her own home against her wishes and placed in residential care. We referred to the right to respect for private and family life under Article 8 of ECHR, which explicitly extends to one’s home and which may be interfered with only in the limited circumstances in Article 8.2, and to the several potentially relevant provisions of UN CRPD, including the right under Article 19 of CRPD to choose place of residence and to receive necessary support and services in the residence of their choice.

Adrian D Ward

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Simon has wide experience of private client work raising capacity issues, including *Day v Harris & Ors* [2013] 3 WLR 1560, centred on the question whether Sir Malcolm Arnold had given manuscripts of his compositions to his children when in a desperate state or later when he was a patient of the Court of Protection. He has also acted in many cases where deputies or attorneys have misused P's assets. To view full CV click [here](#).

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Adrian is a recognised national and international expert in adult incapacity law. While still practising he acted in or instructed many leading cases in the field. He has been continuously involved in law reform processes. His books include the current standard Scottish texts on the subject. His awards include an MBE for services to the mentally handicapped in Scotland; national awards for legal journalism, legal charitable work and legal scholarship; and the lifetime achievement award at the 2014 Scottish Legal Awards.

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Conferences

Conferences at which editors/contributors are speaking

Edge DoLS Conference

The annual Edge DoLS conference is being held on 16 March in London, Alex being one of the speakers. For more details, and to book, see [here](#).

Central Law Training Elder Client Conference

Adrian is speaking at this conference in Glasgow on 20 March. For details, and to book see [here](#).

Royal Faculty of Procurators in Glasgow Private Client Conference

Adrian is speaking at this half-day conference on 21 March. For details, and to book, see [here](#).

Law Society of Scotland: Guardianship, intervention and voluntary measures conference

Adrian and Alex are both speaking at this conference in Edinburgh on 26 April. For details, and to book, see [here](#).

Other conferences of interest

UK Mental Disability Law Conference

The Second UK Mental Disability Law Conference takes place on 26 and 27 June 2018, hosted jointly by the School of Law at the University of Nottingham and the Institute of Mental Health, with the endorsement of the Human Rights Law Centre at the University of Nottingham. For more details and to submit papers see [here](#).

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 report will be out in early April. 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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