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MENTAL CAPACITY REPORT: SCOTLAND

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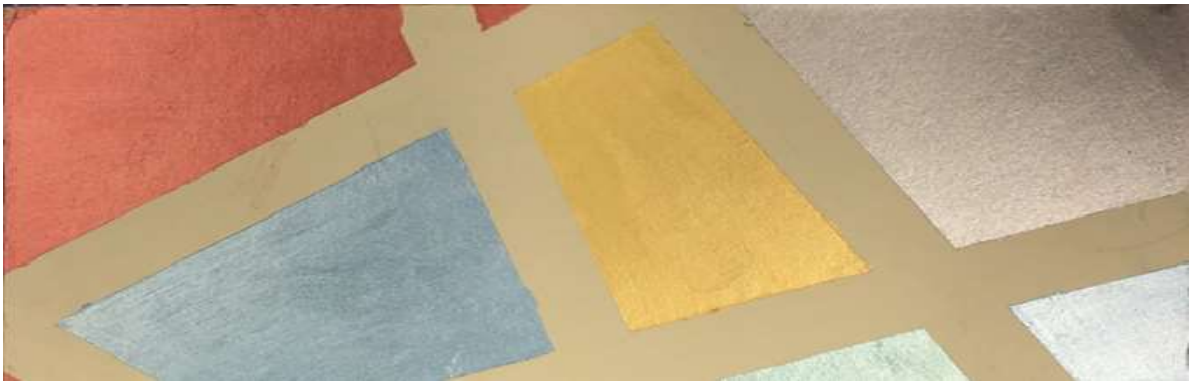

Welcome to the February 2021 Mental Capacity Report. Highlights this month include:

(1) In the Health, Welfare and Deprivation of Liberty Report: vaccination; interim authority to treat pending a final order, and a further LPS impact assessment;

(2) In the Property and Affairs Report: guidance following *ACC* for professional deputies;

(3) In the Practice and Procedure Report: a checklist for international relocation, covert treatment and the courts, and recording of court proceedings;

(4) In the Wider Context Report: decision-making and 16/17 year olds, FAQs following the *Devon* judgment on personal assessment, spotting coercion and control and the BIHR's resources for service providers;

(5) In the Scotland Report: further developments relating to the Scott review, including an update from the Chair, and Scottish consideration of relocation.

You can find our past issues, our case summaries, and more on our dedicated sub-site here, where you can also find updated versions of both our capacity and best interests guides. We have taken a deliberate decision not to cover all the host of COVID-19 related matters that might have a tangential impact upon mental capacity in the Report. Chambers has created a dedicated COVID-19 page with resources, seminars, and more, here; Alex maintains a resources page for MCA and COVID-19 here, and Neil a page here. If you want more information on the Convention on the Rights of Persons with Disabilities, which we frequently refer to in this Report, we suggest you go to the Small Places website run by Lucy Series of Cardiff University.

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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.

Contents

Scott Review Interim Report – discussion continues

In the January Mental Capacity Report I commented on the second Interim Report of the Scott Review, published on 18th December 2020. My further Comments were also written on the basis of what actually appears in the Interim Report, not what else might have been done or be planned. My Comments were provided in the first instance to John Scott QC, leading the Review, and also discussed at a cordial and helpful meeting with the Review Team, before being published. The published version nevertheless remains as originally written, as it is more appropriate that further comments be provided by the Review Team itself. We are grateful to John Scott QC for accepting our invitation to provide the comments below. For ease of access, we again provide the link for the Interim Report here.

Adrian D Ward

Scottish Mental Health Law Review Interim Report December 2020: Update from the Executive Team

The Executive Team of the Scottish Mental Health Law Review (the Review) welcomes comment on Scottish mental health, incapacity and adult support and protection legislation as it currently operates and on how it and related human rights observance might be improved. In this spirit, we therefore thank Adrian Ward for his most recent comments on our December 2020 Interim Report all of which are noted. The December 2020 interim report can be found here and all reports, the Review's Terms of Reference and notes of meetings of the advisory groups can be accessed via the Review's website. For those wishing to fully inform themselves about the Review and its work we recommend that you make full use of these resources. Minutes of advisory group meetings are updated regularly.

We have now entered a period of further investigating aspects of our remit, as set out in our Terms of Reference, and refining and taking forward areas that we have been working on to

date. The Review will end with a final report in September 2022 and, given the time left to work on it, we must focus on this. Our December Report sets out over 30 specific actions we are taking over the next few months. In this note we will briefly explain key aspects of our direction of travel.

Nature of the December Interim Report: what is not said, terminological nuances and accessibility

It is worth commenting on the overall nature of the interim report before making some more specific comments.

Firstly, the report is very much intended to provide a broad overview of the progress of the Review to date. The fact that aspects of the Terms of Reference or important issues associated with the areas under consideration by the various Advisory Groups are not at this stage fully developed or specifically mentioned in the report does not mean that they are not being, or will not be, considered and investigated. We are only half way through the Review and have much to cover in the nineteen months leading to September 2022.

Secondly, the report is intended to provide a widely accessible and understandable flavour of the areas and issues covered to date. We are aware that clarity around terminology and nuances in the use of language still need to be dealt with and this will be addressed in detail by our final report. As our work is ongoing, the interim report is not therefore the place to consider these. What we can say at this stage, however, is that different uses of language and expressions for essentially the same thing amongst different groups of persons and practitioners is very evident and we need to seek a more common language. Indeed, this is essential to the effectiveness of rights-based legislation and its implementation.

Scope of the Review: Terms of Reference

The Review's Terms of Reference – which can be accessed here and should be read in their entirety – state that:

> *'The principal aim of the review is to improve the rights and protections of persons who may be subject to the existing provisions of mental health, incapacity or adult support and protection legislation as a consequence of having a mental disorder, and remove barriers to those caring for their health and welfare.'*

This includes the right to the highest attainable standard of physical and mental health, rights related to the care and treatment and wider civil, political, social, economic and cultural rights, the equal and non-discriminatory enjoyment of which are essential for persons with mental disorder to overcome challenges that may be faced and participate in society on the same basis as others.

Which persons are covered by the Review?

As stated in the terms of Reference, the term 'mental disorder' is the one currently used in our legislation. We will continue to explore alternative phraseology. We are fully aware that use of the expression 'mental disorder' can have offensive connotations and is contrary to the ethos of the Convention on the Rights of Persons with Disabilities (CRPD). Moreover, the recent Scottish Independent Review of Learning Disability and Autism in the Mental Health Act considered whether or not learning disability and

autism should continue to fall within the definition of 'mental disorder' in the Mental Health (Care and Treatment) (Scotland) Act 2003.

During the Review, we take the term 'mental disorder' to include all persons with psychosocial, cognitive and intellectual disabilities who actually or may potentially be subject to our mental health, incapacity and adult support and protection legislation.

As we set out in the interim report, our focus to date has been predominantly on mental illness, but all groups will be considered and included.

Legislation covered by the Review

The Terms of Reference specifically state that when we talk about 'mental health legislation' we are referring to the Mental Health (Care and Treatment) (Scotland) Act 2003 (the Mental health Act), Adults with Incapacity (Scotland) Act 2000 (the AWI Act) and Adult Support and Protection (Scotland) Act 2007 (the ASPA) and that the purpose of the Review is:

> *'To improve the rights and protections of persons, who may be affected by the Mental Health Act, the AWI Act or ASPA, because they have a mental disorder.*
>
> *To remove any barriers that carers who look after and support persons with a mental disorder might have in their caring role.'*
>
> *Whilst, to date, the Review has considered the Mental Health Act and its implementation this has not been to the exclusion of the other two Acts. They will be increasingly considered as we move forward, including the substantial body of work on reform of the AWI Act already undertaken by the Scottish Government. None of that work will be lost.*

Lived experience and carer involvement and consultation

The Review takes the involvement of persons with lived experience and carers in its work very seriously and notes the requirements of Article 4(3) CRPD. As the interim report states, our Executive Team currently has two members with lived experience both of whom are joint Vice-Chair of the Executive Team. Moreover, we are in the process of appointing another lived experience member to the Executive Team.

The membership of our workstream advisory groups includes lived experience and carer membership which continues to be, invaluable and integral to the development of areas under our consideration.

Moving forward

Over the next 3-4 months we will continue to gather evidence and investigate further the key issues we have identified, before we go on to test out options for reform. Our next steps include:

- The establishment of two reference groups representing practitioner interests and lived experience to test out our emerging thinking
- Work with the Mental Welfare Commission to interrogate data on the use of the Mental Health Act
- Commissioned research into the implications of the UN Conventions on the Rights of the Child and the Rights of Persons with Disabilities for mental health and incapacity legislation

- Work with the Royal College of Psychiatrists and other key professional groups to consider problem cases for the use of current legislation
- Engagement with peer support and collective advocacy organisations on priorities in securing rights for those with lived experience.

Further updates and information about the Review can be obtained from the Secretariat on secretariat@SMHLR.scot

John Scott QC, Chair, Scottish Mental Health Law Review

The child who didn't want to return to Poland

Children, like adults with mental or intellectual disabilities, can be the subject of disputes between individuals or factions in their lives. Sometimes such disputes have a cross-border aspect. *W v A*, [2020] CSIH 55; 2021 S.L.T. 62, concerned a 10 year-old child caught in such a situation, a dispute between her parents. In *F v S*, 2012 SLT (Sh Ct) 189, a French adult was caught in a dispute between members of her French family and her Scottish stepfamily, after she had been brought to Scotland. We cover *W v A* here because it was a decision upon appeal by an Extra Division of the Inner House, overruling a decision by a Lord Ordinary, emphasising points which can readily be "read across" to similar cases concerning adults.

In *W v A*, the child's parents cohabited in Poland until she was seven. Thereafter mother sought permission from the Polish court to take the child to Scotland. Permission was refused. In June 2019 mother wrongfully removed the child to Scotland, in defiance of the Polish court order. In March 2020 father petitioned the Court of Session for the child's return to Poland. Although the child herself objected to the return, the Lord Ordinary took the view that the child's views were outweighed by other features of the case, and in particular the decision of the Polish court. He exercised his discretion in favour of father, and ordered her return to Poland.

Mother reclaimed. The decision of the Inner House was delivered by Lord Malcolm. He held that: "… in the circumstances of the present case we are driven to the conclusion that the Lord Ordinary viewed the Polish court's decision, and the mother's immediate defiance of it, as eliding any need to address other factors. This is an error in law, and thus we will quash his decision." He further held that in view of the Lord Ordinary's error of law, the appeal court had a discretionary power either to order or to refuse the child's return to Poland.

As to the child's views, Lord Malcolm narrated the information before the court as follows: "The reporter stated that the child was capable of expressing her views. She objects to a return to Poland. She prefers being in Scotland, where she has everything she wants, including her mother, a house, her own bedroom, a happy school life and friends. In Poland her living conditions were "mega-crowded". She did not want to spend time with her father. She had various complaints about him and her contact visits with him which need not be recorded in this opinion. If returned to Poland she thought she would not be allowed to come back to Scotland. She is "really happy" in Scotland. The reporter found no evidence of her views being influenced (intentionally or otherwise) by her mother. They

were her own. She had no understanding of the purpose of a return to Poland, nor of the respective functions of the courts of the two jurisdictions."

The Inner House proceeded on the basis that theirs was an interim decision pending final determination of the matter by the Polish court. On that basis, it refused to order the child's return to Poland.

That case, of course, turned principally upon the Hague Convention of the Civil Aspects of International Child Abduction, which is incorporated into the Child Abduction and Custody Act 1985. Aspects relevant to those provisions, and the status of the 10 year-old as a child, are not covered in this Report. Broadly similar considerations would however apply to a dispute concerning an adult. In particular, as relevant proceedings in Scotland would be based upon Schedule 3 to the Adults with Incapacity (Scotland) Act 2000, the principles in section 1 of that Act would apply. Section 1(1) provides that those principles apply "to any intervention in the affairs of an adult under or in pursuance of this Act". Expressly included is any order made in proceedings under the Act, or for the purpose of proceedings under the Act "for or in connection with an adult". Even though such a dispute might be between others, such as factions of a family, the person at the centre of the proceedings would be "the adult" for the purposes of the section 1 principles. In *W v A*, the child was represented by Counsel. One would have concerns if in a dispute concerning an adult the court did not ensure the availability of suitable representation to the adult.

Adrian D Ward

The adult who did want to return to Poland

The Judgment of Mr Justice Hayden, Vice President of the Court of Protection, in the case of *Re UR* [2021] EWCOP 10, is described in the Practice and Procedure section of this Report. I draw the attention of Scottish readers to it for three reasons. For ease of reference, the link to the Judgment is repeated here

Firstly, it provides a very good summary of the current approach in England & Wales to the general issue of decision-making in such cases, where (basically) there is a choice between overruling an adult's wishes, or implementing them. Increasingly in the modern world, sophisticated jurisdictions may have different routes towards arriving at decisions in such circumstances, but the goal tends to be the same, and the underlying principles of many of the dicta quoted by Mr Justice Hayden, and his own comments, may sometimes be helpful to practitioners in the context of Scottish cases.

That context may include circumstances such as those that I reported in the last three issues of the Report last year, leading me to ask in the November issue: "*Are the forces of institutional ageism and disability discrimination in Scotland so powerful as to exclude some people altogether from the scope of the rule of law, and from the concept of the universality of human rights and fundamental freedoms?*" Practitioners might find it useful, on occasions, to be able to cite passages quoted in the Judgment in the *UR* case, such as the following:

"… we must avoid the temptation always to put the physical health and safety of the elderly and the vulnerable before everything else. Often it will be appropriate to do so, but not always. Physical

health and safety can sometimes be brought at too high a price in happiness and emotional welfare."

"*What good is it making someone safer if it merely makes them miserable?*"

"*… it seems to me that for the elderly there is often an importance in place which is not generally recognised by others; not only the physical place but also the relational structure that is associated with a place …*"

"*… several last months of freedom in one's own home at the end of one's life is worth having for many people with serious progressive illnesses, even if it comes at a cost of some distress*"

"*…although there is a significant risk that a home care package at home will 'fail', there is also a significant risk that institutional care will 'fail' in this sense (that it, produces an outcome that is less than ideal and does not resolve all significant existing concerns)*"

The sources of all of those quotations appear in paragraph 25 – 27 of the Judgment.

Secondly, among reasons for drawing the case of *UR* to the attention of Scottish readers, Mr Justice Hayden rightly commends the quality of preparation for the hearing before him, and the extent to which all relevant elements in the process of reaching a decision were identified and addressed. Here again, with intelligent adaptation to the requirements of Scots law, the overall methodology, and presence of checklists, is helpful, particularly when one has to concede that the standard of pleadings and of safeguarders' reports in Scotland continues to vary from excellent at one extreme to simply not fit for purpose at the other. As admittedly a grumpy old former practitioner, I do rather wonder where – for example – some courts find safeguarders who apparently have not read section 1 of the 2000 Act and understand the need to consider all of the principles in relation to every intervention.

Thirdly, the particular question in this case was whether the court should grant an order acceding to, and implementing, *UR*'s wish to return to her native Poland. Here again, for Scottish practitioners the careful manner in which this was addressed, and the suggested checklist provided by Mr Justice Hayden in paragraph 57 of his Judgment, are likely to be helpful. The one possible mild criticism of the discussion of relevant cross-border considerations in paragraphs 36 *et seq* of the Judgment, and of that checklist, is the absence of reference to the involvement of the Central Authority in cases involving countries that have ratified Hague Convention 35 of 2000 on the International Protection of Adults. The provisions of that Convention are effectively incorporated in Scots law by Schedule 3 to the 2000 Act. Schedule 3 to the Mental Capacity Act 2005 serves a similar function for England & Wales, but with the obvious difference that Hague 35 has been ratified in respect of Scotland but not in respect of England & Wales; nor has it been ratified in respect of Poland, so that it was inapplicable to either the transferring state or the receiving state in this particular case. In consequence, as Mr Justice Hayden acknowledges in paragraph 38, the cross-border provisions of Hague 35 are not in force in England & Wales. He might have pointed out that, as is demonstrated by transfers from England to Scotland, the role of the Central Authority requires to be recognised in a transfer from England & Wales to a country that has

ratified Hague 35: the role of Scotland's Central Authority in such cases was addressed in *Darlington Borough Council, Applicants*, 2018 SLT (Sh Ct) 53 (see also my case commentary at 2018 SLT (News) 26. The requirements to involve the Central Authority arise under Article 33 of Hague 35, as effectively replicated in paragraphs 7 and 8 of the 2000 Act. If current prospects of Hague 35 being ratified in respect of England & Wales during the course of this year materialise, Mr Justice Hayden's checklist will require to be updated.

Adrian D Ward

Caring responsibilities as mitigation

An accused's responsibilities as a carer was a principal mitigating factor, albeit along with other factors, in a successful appeal against sentence to the High Court of Justiciary in *Houten v HM Advocate*, [2019] HCJAC 43; 2021 S.L.T. 33. The accused had pleaded guilty to being concerned in the supply of controlled drugs contrary to s.4(3)(b) of the Misuse of Drugs Act 1971. He had no significant previous convictions, was of good record, and had already served a period in custody. He accepted that he had been involved in the supplying of Class A drugs, but on one occasion only when he performed for a friend the task of providing a safe house and holding the drugs for that friend. He made no direct financial gain from this. Also, over a number of years he had been primary carer for his partner's son, aged 18, with what the court described as "a considerable range of disabilities". As well as caring for the son, he was "the boy's only male friend and therefore plays a very important part in his life".

Taking all relevant matters into account, the appeal court concluded that this was a case "that might exceptionally, and we would emphasise exceptionally, be dealt with by a community payback order". For the sheriff's sentence of 23 months' imprisonment, discounted from 30 months, the appeal court substituted a payback order for a period of three years subject to an unpaid work requirement of 250 hours to be completed over a period of 12 months.

Adrian D Ward

The executors who were also attorneys

The late James Campbell died on 14th June 2015 at the age of 92, leaving two sons. In 2008 he had appointed one of his sons, and that son's wife, to be both his joint welfare and continuing attorneys, and his joint executors. They acted as his attorneys, and provided him with substantial ongoing care and support, until his death. The other son lived overseas. He challenged various actions of his brother and sister-in-law both before and after their father's death. He petitioned the Court of Session for removal of them as executors, and appointment of a judicial factor to administer the estate. Lady Poole issued her Judgment in *Campbell v Campbell's executors*, [2021] CSOH 3, on 20th January 2021, having heard proof over two days on 3rd and 4th December 2020, followed by submissions on 6th January 2021.

"I've seen it all before" will be the reaction of many practitioners upon reading the preceding paragraph. Those aware of the solution to such situations proposed by John Kerrigan, solicitor, now a consultant with Blackadders LLP (and

named here with his kind agreement) will have already concluded that the "Kerrigan solution" would offer a better way of addressing such situations. I refer further to that solution at the end of this article.

Beyond that bald summary, it seems that the parties were not quite as intransigently inflexible as often is the case in such family disputes. They certainly seem to have been litigious: the overseas brother had raised a previous action of count, reckoning and payment. He admitted to having stolen a bankbook belonging to the deceased when staying in the deceased's house, and he used the information in it to challenge the attorneys/executors. The overseas brother had sent important communications, including in relation to the previous action, to the wrong address for the attorneys/executors. They on their part had made many "mistakes", as they are somewhat charitably characterised in the Judgment. For example, after the deceased's death they withdrew substantial sums and applied them in accordance with what they maintained were instructions and wishes of the deceased, but those were not contained in his Will. The "mistakes" were however retrievable, and it does seem that in due course they were retrieved, or at least were being addressed with a view to retrieving them. A peculiarity is that at one stage they for some reason consulted English solicitors, but as Lady Poole narrated and commented: "*… the executors chose not to instruct a solicitor in Scotland to assist with the executry to save expense. They have accordingly not had the benefit of legal advice about permissible expenses and distributions. There is no doubt in my mind this has led to problems. Ignorance of legal requirements does not absolve executors from carrying out their legal duties. Nevertheless, the question of whether or not executors have breached any duties is not the same question as whether they should be removed from office.*"

The competence of removing executors and appointing instead a judicial factor does not appear to have been in dispute, but Lady Poole pointed out that the view of the courts has always been that such a remedy is an "extreme" measure (see *Gilchrist's Trustees v Dick*, (1883) 11 R22); that "mere negligence", even resulting in some loss, might not afford sufficient grounds for removal but that "*persistent, wilful neglect, contempt, and obstruction, which taken together render execution of a trust a practical impossibility, might suffice, as might unreasonable and wilful refusal to perform the duty of a trustee*" (*MacGilchrist's Trs v MacGilchrist*, 1930 SC 635); and more recently the test in *Shariff v Hamid*, 2000 SCLR 351, as to whether on the facts there was something equivalent to, or as bad as, malversation of office when a trustee obstinately refuses to acknowledge his legal duty and to discharge his legal responsibility, as a result bringing the affairs of the trust into confusion. She referred to several further cases. She concluded that "at this stage" the test for removal had not been met: "*In my opinion it is premature to remove the executors and appoint a judicial factor in the particular circumstances of this case. I recognise the petitioner has some legitimate complaints about the executry administration to date. Nevertheless, for reasons set out below I do not consider that the difficulties so far justify removal of the executors. I therefore refuse the prayer of the petition in hoc statu. The order I make leaves it open to the petitioner to reapply to this court by note in this process (under*

Rules 14.10 and 15.2 of the Rules of the Court of Session) if matters cannot be brought to a satisfactory conclusion by the executors."

In conclusion, the most recent iteration of the "Kerrigan solution" (proposed by me to Scottish Government on behalf of the Mental Health and Disability Committee of the Law Society of Scotland) was as follows:

> *"Continuation of investigations and remedies after death of the adult – As a particular example of a relatively straightforward and self-contained amendment added to the list mentioned above, and one which would appear to be uncontroversial, we would select the proposals that the Public Guardian should have discretion to continue investigations after the death of the adult, that the obligation under section 81 to repay funds should also continue after the death of the adult, and that where an attorney is also executor the entitlement to hold the attorney to account should not be limited to the executor."*

Word is awaited as to whether Scottish Government intend to allocate in the next session of Parliament an opportunity for amendment to the Adults with Incapacity (Scotland) Act 2000, and if so whether the Kerrigan solution is adopted as one of the improvements thus to be made.

Adrian D Ward

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Alex is recommended as a 'star junior' in Chambers & Partners for his Court of Protection work. He has been in cases involving the MCA 2005 at all levels up to and including the Supreme Court. He also writes extensively, has numerous academic affiliations, including as Visiting Professor at King's College London, and created the website www.mentalcapacitylawandpolicy.org.uk. To view full CV click here.

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Neil has particular interests in ECHR/CRPD human rights, mental health and incapacity law and mainly practises in the Court of Protection and Upper Tribunal. Also a Senior Lecturer at Manchester University and Clinical Lead of its Legal Advice Centre, he teaches students in these fields, and trains health, social care and legal professionals. When time permits, Neil publishes in academic books and journals and created the website www.lpslaw.co.uk. To view full CV click here.

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Annabel has experience in a wide range of issues before the Court of Protection, including medical treatment, deprivation of liberty, residence, care contact, welfare, property and financial affairs, and has particular expertise in complex cross-border jurisdiction matters. She is a contributing editor to 'Court of Protection Practice' and an editor of the Court of Protection Law Reports. To view full CV click here.

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Nicola appears regularly in the Court of Protection in health and welfare matters. She is frequently instructed by the Official Solicitor as well as by local authorities, CCGs and care homes. She is a contributor to the 5th edition of the *Assessment of Mental Capacity: A Practical Guide for Doctors and Lawyers* (BMA/Law Society 2019). To view full CV click here.

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Katie advises and represents clients in all things health related, from personal injury and clinical negligence, to community care, mental health and healthcare regulation. The main focus of her practice however is in the Court of Protection where she has a particular interest in the health and welfare of incapacitated adults. She is also a qualified mediator, mediating legal and community disputes. To view full CV click here.

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Rachel has a broad public law and Court of Protection practice, with a particular interest in the fields of health and human rights law. She appears regularly in the Court of Protection and is instructed by the Official Solicitor, NHS bodies, local authorities and families. To view full CV click here.

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Steph regularly appears in the Court of Protection in health and welfare matters. She has acted for individual family members, the Official Solicitor, Clinical Commissioning Groups and local authorities. She has a broad practice in public and private law, with a particular interest in health and human rights issues. She appeared in the Supreme Court in *PJ v Welsh Ministers* [2019] 2 WLR 82 as to whether the power to impose conditions on a CTO can include a deprivation of liberty. To view full CV click here.

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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. 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; honorary membership of the Law Society of 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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Jill Stavert is Professor of Law, Director of the Centre for Mental Health and Capacity Law and Director of Research, The Business School, Edinburgh Napier University. Jill is also a member of the Law Society for Scotland's Mental Health and Disability Sub-Committee. She has undertaken work for the Mental Welfare Commission for Scotland (including its 2015 updated guidance on Deprivation of Liberty). To view full CV click here.

Conferences

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

Alex is also doing 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 March. 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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