Returning Instructions – Consultation Report

Introduction

1. The Bar Standards Board (BSB) regulates barristers called to the Bar in England and Wales. As a regulator the BSB's purpose is to regulate the Bar so as to promote high standards of practice and safeguard clients and the public interest. The BSB Handbook is built on the principle of outcomes-focused regulation, using ten core duties, required outcomes, mandatory rules, and supporting guidance.

2. Prior to the announcement by the Legal Aid Agency (LAA) in November 2013 that it was making changes to its Very High Cost Cases (VHCCs) contracts, the BSB had identified decisions made by third party funders as an area of concern. While the LAA is the one of the largest and highest profile of the third party funders a decision made by any funder to vary a contract would have the potential adversely to affect a lay client. The decision by the LAA brought this issue into sharp focus and the Board acted to address a situation that in its view represented a risk to the public. Specifically, the Board felt that the rules and guidance governing situations when a barrister can or is professionally obliged to withdraw their services, known as returning instructions, may not be sufficient to meet the challenges of a changing legal service market. In light of the challenge interim guidance was issued and a commitment was made to consult fully on possible changes to the relevant guidance in 2014.

3. A consultation on changes to the guidance on returning instructions opened on 27 March 2014 and scheduled to close on 25 April 2014. Some 240 responses were received and the BSB agreed to extend the closing date for the exercise to 28 April 2014.

4. This report provides a summary of the responses to the consultation.

Overview

5. An online consultation was launched on 27 March 2014. The consultation document proposed a change to the Handbook guidance governing situations when a barrister can or is professionally obliged to withdraw their services, known as returning instructions. No changes were proposed to the applicable rules at c25 - c26 or required outcomes. Four questions were posed and those responding were invited to do so on a formatted sheet included at the end of the document. The four questions posed were:

Question One:
Have we adequately identified the risks to clients, the administration of justice, third parties and the wider public interest where a barrister withdraws from a case? Are there any additional impacts or any unintended consequences arising from this guidance?

Question Two:
Are the additional considerations included in gC87 .1 - .7 adequate to assist a barrister in deciding whether or not they would be justified in withdrawing?

Question Three:
Do you consider it proportionate to remove the automatic assumption in guidance that instructions are withdrawn if there is a fundamental change in remuneration? Does the revised guidance achieve the right balance between the interests of the barrister and of clients, witnesses and the interests of justice? If not what safeguards would you propose to protect the wider public interest?

Question Four:
Are there any further matters the BSB should take into account that are relevant to this guidance?

6. Of the questions asked 161 responses utilised the response sheet provided and 150 provided an answer to all four questions.

    - 159 provided an answer to question 1.
    - 155 provided an answer to question 2.
    - 162 provided an answer to question 3.
    - 150 provided an answer to question 4.
    - 79 provided a response in an alternative format.
    - 64 responses stated that they wished to endorse the position of a representative body.

7. In summary, none of the responses supported the proposed change to the Handbook guidance.

8. Of the 240 responses received, 239 were from members of the Bar, those involved in the provision of legal services, or their representative bodies. The remaining response was received from a member of the public. The BSB actively sought to engage with other stakeholders, including consumer groups, to discuss the consultation and the possible wider implications for the public. Copies of the consultation were sent to key consumer groups and the consultation was available

for comment on the BSB website throughout the consultation period. Unfortunately, no non-legal stakeholder group responded to the consultation or – despite phone calls to key consumer groups referring to the consultation and inviting views – took up that invitation to contribute to wider discussion.

The BSB Decision

9. Following a review of the consultation responses the Board considered the issue in depth. While it remained sure that it was entirely right and appropriate for the BSB as a public interest risk-based regulator to seek to mitigate the risk of harm to the public that risk had lessened.

10. The decision in November 2013 by the LAA on VHCC contracts had created an immediate risk to lay clients of barristers already engaged on a VHCC contracts. Under the existing guidance at gC87 the change imposed by the LAA amounted to a withdrawal of instructions and offer of new instructions. While it was anticipated that most barristers would take it upon themselves to consider the wider implications of a withdrawal mid-case it was felt that the guidance did not sufficiently assist the Bar in making that decision.

11. There has been no evidence that in the intervening period there have been any instances of any member of the Bar involved in a VHCC matter withdrawing in circumstances that caused significant harm to the client, administration of justice, or other third parties. It was the view of the Board that the overall anticipated risk had reduced and, while the potential impact on the public of decisions by third party funders remained high in the short term, the risk of such an outcome had significantly lessened.

12. VHCC had demonstrated that the Bar could take action in response to address decisions by third party funders but in doing so could take steps to mitigate the risk of harm to lay clients and the public in general. The consultation exercise raised a number of issues for the Board to consider and it was therefore no longer convinced that a change to the guidance, as outlined in the consultation paper, was necessary. Given the experience of the way in which the Bar coped with the challenges raised by VHCC and the importance of third party funders to all areas of work the Board indicated that it would commission further work to reconsider the scope and detail of the relevant rules and guidance.

13. Given the level and detail of the responses received the Board took the view that the BSB was now well sighted on all the issues around the guidance at gC87. The guidance at gC87 will be kept under review and in the event that it is revised the themes and issues recorded in this summary will be taken into account. In the light of the consultation and the way the guidance was applied by the Bar there is no immediate need for it to be changed. However it was noted by the Board that it was essential that Handbook remained relevant to address the challenges faced by a

modern Bar. The Handbook is intended to be both a regulatory document and a valuable tool to assist the Bar to continue to achieve the highest standards.

Summary of Responses

14. Of the responses, 150 provided answers to all four questions. In total, 240 responses were received – many of which addressed themes and raised issues not specifically included in the consultation document. A number of the responses were lengthy and dealt with a wide range of issues, some of which amounted to a fairly complex line by line assessment of the guidance and rules. While the consultation document posed a number of questions it was clear during the analysis that the themes and issues raised transcended the questions posed and were therefore most effectively dealt with separately.

Core Themes

Contract Law

15. More than half of the responses received raised concerns over possible incompatibility between the proposed guidance, contract law, and private law rights. While the consultation document stated that it was not the intention of the regulator to inhibit the Bar from entering into or enforcing rights under a contract it was generally felt that this would be the net result.

16. Levels of detail varied from a comprehensive assessment of the law and the way in which contracts for service had developed across the Bar to basic assertions of contractual interference by the regulator. Barristers asserted that they should be able to enforce their rights under a contract following a material or repudiatory breach without first referring to regulatory guidance. In the event that a barrister felt that they could not enforce their contractual rights as to do so would bring them into conflict with their regulator this would amount to an interference with their private law rights.

17. More fundamentally, it was alleged that the guidance would create a situation where there had been a repudiatory breach of contract effectively ending the contract yet the guidance indicated that the barrister should continue to discharge that contract. As one barrister put it:

    "professional rules of conduct cannot override basic legal principles. An attempt to unilaterally vary the terms of a contract means that the contract comes to an end. The other contracting party cannot be forced to fulfil their side of the bargain, because there is no bargain".

18. In some instances, the requirement to apply the guidance was said most likely to result in the barrister being compelled to act to their disadvantage. Other concerns related to the inequality in bargaining position created by the guidance once it was

known that in specific circumstances a barrister may be obliged to continue to represent a client notwithstanding a clear breach of contract. This was put in clear and direct language in a response from a barrister who felt that:

"a contract for services would, in ethical terms as well as legal terms, become a contract for slavery were the BSB to enforce a barrister under prescriptive compulsion to continue to act in a case where there is no longer adequate, or any, consideration".

19. It was felt that the guidance specifically supported the position of the LAA and would encourage both public and private sector third party funders to divest themselves of any responsibility to consider the wider implications of their decisions. In essence the Bar was to act as the conscience of the funders. It was felt to be singularly unfair for the Bar to be held accountable if the interests of justice, courts and lay clients were harmed following a funder withdrawing support. The following was typical of the responses received from individual members of the Bar:

    "If the LSC [LAA] or any other party responsible for remunerating a barrister decides to change the agreed remuneration, they will be responsible for any knock-on effect of the barrister withdrawing to, eg, the lay client and witnesses."

    "[it should be seen as in the public interest that where the funding is reduced] if a case cannot proceed wasted costs should be ordered against the lay client or third party funder".

20. There was specific criticism of the additional considerations – their meaning and application. The guidance was considered to effectively undermine the contract to such an extent as to make its terms meaningless. Examples given included where a payment schedule had been agreed and the funder defaulted. In that situation, it was said that the barrister should have to look no further than the schedule. If a barrister could be compelled by virtue of guidance from the regulator to continue in a contract following a breach of the agreed payment schedule then the schedule would become a meaningless document. A change to remuneration or breach of the payment schedule was in most cases considered to amount to a repudiatory breach and any restriction on the barrister's right to withdraw their services inappropriate. The response from a regional circuit concisely noted that the:

    "the rate of payment is a fundamental term of any contract for the supply of services".

21. The guidance in requiring the Bar to look beyond the terms of the contract was said to be undermining the agreement from the outset by introducing uncertainty as to the consequence of a breach. It was argued that, on entering into a contract, a third party funder should know the consequences of breach – which in most cases for a barrister will be the withdrawal of their labour. If a client is represented by a solicitor the onus should be on the solicitor to explain the implications of any contract for

funding. In the latter circumstances a barrister should be able to rely on their professional client to clearly explain the implications of a breach.

22. It was suggested that – as the proposed guidance was clearly primarily intended to mitigate the impact of the decision by the LAA to vary, without agreement, the terms of engagement after instruction – the guidance should only apply to publicly funded work. There was a widely held belief that the consultation was overly focused on addressing the issues caused by the LAA and, as a result, the BSB had failed to consider its impact on relationships with other funders. Third party funders in civil and commercial matters, if aware of the guidance, could seek to take advantage of a barrister's professional obligations to impose last minute fee variations.

The Cab Rank Rule

23. Those responses that considered the wider impact of the guidance on other rules argued that the proposed guidance at gC87 fundamentally undermined the cab rank rule as it could compel a barrister to work for less than a proper fee or no fee. This was based on rule C30.8 exempting a barrister from the cab rank rule in the absence of proper fee. In applying the proposed guidance at gC87 a barrister could feasibly find themselves working for a level of remuneration that would not constitute a proper fee in accordance with the cab rank rule. It would therefore be possible for a barrister to be obliged to accept instructions on the basis of a proper fee only for that fee to be reduced later. On this issue a representative body summarised the issue as follows:

"the cab rank rule is central to the ethos of the Bar. Barristers are bound to represent anyone when a proper basis for the barristers' remuneration has been agreed. The proposed guidance renders the cab rank rule meaningless since where the clients are not funding the litigation themselves, a barrister can be instructed on the basis a proper fee has been agreed and then forced to act for an inadequate fee at a late stage".

Regulatory Uncertainty

24. There was a general consensus that the existing guidance at gC87 was clear and unambiguous. Despite being in guidance there was no criticism of the use of prescriptive language. The guidance in stating that in the event of a change in the level of remuneration a barrister "should" treat that change as a withdrawal of instructions had come to be viewed as a part of the rule itself. This view was repeated across the returns with the guidance seen to provide certainty for all parties as to the consequences of a breach of contract. A regional circuit noted that the guidance provided certainty and therefore acted as a disincentive to funders but:

"*this disincentive would be weakened if the funder was able to play upon the barrister's concern that professional disciplinary consequences might follow"*.

25. Under the existing construction an offered variation of remuneration or terms was deemed to be an offer of new instructions. Barristers could chose to accept the offer made to them if they wished to continue to represent a client. As a new instruction the barrister could seek alternative terms that allowed them to continue to represent a client on a strictly limited basis to progress a case to a point at which the barrister felt they could reasonably withdraw. Many respondents argued that – if they were to find themselves in a position where they felt their client would suffer a negative impact if they ceased to represent them – they would accept the new terms on a limited basis. Such behaviour was consistently argued to be in the best traditions of the Bar and, as such, would be adopted without regulatory compulsion.

26. The use of prescriptive language in the revised guidance was particularly criticised for creating what was viewed to be a veiled threat of enforcement for a failure to apply the guidance. This criticism flowed from the second sentence of the first paragraph of gC87 requiring that a barrister when deciding if they may withdraw from a case "must consider (and the BSB will have regard to) all the circumstances". There was a considerable depth of feeling a barrister commented that:

    "t*he implied threat '(and the BSB will have regard to)' is unpleasant".*

    Other responses reflected the view that the construction amounted to a veiled threat of enforcement action if a barrister failed to comply with the guidance. One barrister concluded that:

    "barristers will be intimidated into carrying on with the contract [despite the change] because of the fear that they will be reported to the BSB".

27. The guidance was deemed to leave too much scope for different conclusions to be drawn from the number of and subjective nature of the factors listed. It was feared that a barrister who properly and judiciously applied the guidance might still be deemed to have reached the wrong conclusion in the view of the regulator and be liable to sanction. The following comment was typical of this perspective:

    "There is inevitable scope for different conclusions to be drawn from the number of and subjective nature of the factors listed."

28. A lack of any guidance as to how competing considerations should be weighted when applied was raised. It was felt that the guidance was insufficient to give any real indication of the significance of the considerations:

    "the guidance gives no indication as to the weight that the BSB would give to consideration .7, as against considerations .1 - .6. The absence of any such indication places any Barrister faced with the decision as to whether to withdraw from third party funded cases in an invidious position, which almost inevitably compels the

Barrister to remove from the balance consideration .7 and, in third party funded cases, to almost inevitably refrain from withdrawal".

"…it is not clear whether there is any significance to the order in which the considerations appear and whether it is intended that they should be weighted in any way. In my view, number 7 should be the most important factor and yet it appears last in the list".

29. Where raised the consensus was that any change amounted to a reduction in the agreed fee and warranted withdrawal of service. However, the use of the words a "fundamental breach" raised the concern that a small reduction in fees might not be deemed to warrant a withdrawal by the BSB. It was questioned whether, for example, a £5000 brief that was reduced to £4500 amounted to a fundamental change to the level of overall remuneration. A fee that is reduced may still represent a reasonable fee, depending on the work involved, but was not that agreed and would still ordinarily be a breach of a contract.

Simply Unnecessary

30. The vast majority of responses recognised that the actions of the LAA had highlighted a risk of harm to lay clients, but felt strongly that the responsibility for dealing with the repercussions of that decision should not sit with the Bar. Further, it was argued that, in the best traditions of the profession, it was likely that no barrister would simply abandon a client without first attempting to assist them to secure new representation or progress their case. It was clearly put in a response from a chambers specialising in civil, family and criminal law that:

"…late changes in remuneration and consequent returns have occurred for years, but they have been managed without ill-effect upon anyone or the legal system at large. This management has been due in large part to the decent and honourable behaviour of barristers. If this be right, there is no need for regulatory change".

31. Further, it was argued that the Courts were more than accustomed to dealing with this type of situation and as far as the representation of a client was concerned would give time to the client. This was the view of a criminal advocate:

"if the basis of funding is withdrawn, and counsel chooses to withdraw, then the Court will (and always has) allowed time for the client to secure alternate representation".

32. In reviewing the consultation responses the Board considered the recent conduct of those members of the Bar who had found themselves in the exact situation envisaged by the guidance. While instructions had been returned those involved had clearly acted with the highest level of integrity and clearly taken steps to protect the interests of their lay clients. The fact that the BSB was not aware of any complaint

being made against a barrister as a consequence of their handling of a case impacted by the VHCCs decision was viewed as significant.

Wider Consequences for the Public

33. It was widely argued that the removal of an automatic right to withdraw from a case on the basis of a unilateral change in the level of remuneration would so increase the level of associated risk as to make publicly funded work untenable. As a result of increased risk exposure for the barrister, it was believed that the pool of barristers willing to undertake work funded by third party providers would be reduced as barristers sought better remunerated work with guaranteed fees elsewhere or ceased self-employed practice. The following were typical of the comments received:

    "fewer and fewer barristers will take on publicly funded work [resulting in] a diminution in the quality and choice of advocates available to the public".

    "If this proposal is carried through it will result in yet a further reduction in the pool of able and experienced barristers prepared to undertake VHCC work."

    "Considering the Administration of Justice is at much greater risk from poor barristers, or No barristers, than anything else. If publicly funded lawyers are not properly remunerated, the brightest and the best will no longer consider doing publicly funded work."

34. As a consequence of a fall in the pool of barristers available to undertake publicly funded work there would be a clear diminution in the quality and choice of advocates as those able to work elsewhere left. Losing what was described as the brightest and the best represented a significant threat to the administration of Justice and wider public interest. There was recognition that any gap left by barristers withdrawing could be filled by solicitors with higher rights who while capable would not offer the public the same level of service as the Bar. The Bar was felt to offer a highly specialised advocacy service underpinned by significant training not replicated in the solicitor profession or elsewhere. Others felt that the guidance in combination with other factors at play, particularly at the publicly funded Bar, would have far more reaching impacts:

    "if barristers found themselves unable to rely upon the professional propriety of refusing to continue to work in circumstances when a 3rd party sought to make unilateral changes to the terms of engagement. It is wholly predictable that the current system of barristers accepting publicly funded work would collapse."

35. Concerns about the long term viability of the bar were linked to funding and concerns were raised that if the regulatory framework did not assist the Bar it would risk irrevocably damaging it with a net impact on the wider public good:

    "the wider public interest is best served by a fully functioning and properly remunerated independent bar. Similarly, the administration of justice. In particular, in legally aided work, the public has to have confidence that those from whom representation might be received are not likely to have their terms altered in such a

way as to adversely affect their representation mid-stream. This has to apply with the interests not only of defendants in mind, but also the interests of witnesses, jurors and victims and their relatives."

36. Wider implications were linked to aspects such as diversity. It was noted that, while the Bar attracted skilled professionals from across society, diversity remained an issue. Where raised it was said that the publicly funded Bar was arguably the most diverse and under the most pressure from cuts. The revised guidance in raising the possibility of a barrister reliant on publicly funded instructions being forced to work for less money might well cause more barristers to leave the profession as:

    "…inadequate remuneration limits in a real and immediate way the diversity of the profession".

Lack of Evidence

37. The consultation document was heavily criticised for the absence of any qualitative research or other evidence substantiating the risk to the public posed by the current rules and guidance. It was felt that the BSB, as a public interest regulator, should have undertaken to consult with the representative Bar associations to assess the impact of the change to VHCCs and develop an appropriate response. The following comments reflect the general view of those who raised this point:

    "it is almost always possible for another advocate to take a returned brief and give equivalent or better advice or advocacy than the person returning it. Please refer to evidence of returns causing harm to clients, the administration of justice, or the wider public interest."

    "What is the basis for saying 'The presumption underlying gC87 is that the fundamental change to counsel's remuneration is directly attributable to the client'? I am not aware of anything in the documentation relating to the development of the new Handbook to suggest this."

    "A change of this sort should not be made unless there is evidence that demonstrates that the existing rule does not serve the regulatory objectives. The need for change should be evidence based."

Incompatibility between the Guidance and Rules

38. Issues of inconsistency between the rules and guidance were highlighted. Specifically, rule C26.5 allowing a barrister to return their instructions if they do not receive payment when due in accordance with the agreed terms. The revised guidance at gC87 identified a change to the "basis of your remuneration" a situation also covered by rC26.5. It was therefore argued that if the revised guidance at C87 were to apply to rC25.5 its application would add a qualification not contained in the rule itself.

39. Since rC26.5 is clear as to what action a barrister need take to be able to return instructions, it was questioned how the proposed guidance could apply. In their response a representative body drew a distinction between the guidance at gC87 and rule C26.5:

    "it is far from clear how the proposed gC87 can qualify rC26.5 where that rule applies. In addition, the proposed gC87 refers specifically to the wording of rC26.8 ("some other substantial reason"), and not to rC26.5".

Points of Clarification

40. A number of responses demonstrated a lack of awareness of the BSB – its statutory basis and function. It was widely felt that the BSB, in proposing to change the guidance, was supporting government policy and failing in its duty to represent or defend the interests of the Bar.

    The following is intended to assist in clarifying some of the points raised in the consultation responses.

<u>Purpose and Remit of the BSB</u>

41. The Bar Council is the official regulator of the Bar, but since 2006 has delegated its regulatory functions to the BSB. In accordance with its obligations under the Legal Services Act 2007, the BSB's regulatory objectives are:

    - Protecting and promoting public interest.
    - Supporting the constitutional principles of the rule of law.
    - Improving access to justice.
    - Protecting and promoting the interests of consumers.
    - Promoting competition in the provision of services.
    - Encouraging an independent, strong, diverse and effective legal profession.
    - Increasing public understanding of the citizen's legal rights and duties.
    - Promoting and maintaining adherence to the professional principles.

42. In common with other legal regulators in England and Wales the BSB is obliged to act in the wider public interest which may appear, on occasion, to diverge with the perceived interests of the Bar. As part of this consultation, the BSB received responses from representative bodies including the Bar Council, a number of Bar Associations, and Circuits. The representative bodies made strong cases against the proposed guidance and heavily criticised the LAA over VHCC contracts.

<u>The BSB and the Legal Aid Agency</u>

43. There were numerous allegations that the BSB had been coerced or otherwise "leant on" by the LAA to launch the consultation. The timing of the consultation was seen to

be, at best, unfortunate and, at worst, deliberately intended to weaken the representative bodies bargaining position with the LAA.

44. It is correct that the consultation specifically identified the changes made by the Legal LAA to VHCC contracts and levels of remuneration as a point of concern. It is not correct that the BSB developed the proposed guidance exclusively to address the VHCCs issue as the BSB had been looking at the implications of decisions made by third party funders in advance of the LAA decision.

45. In the light of the wider implications for access to justice and the public interest it was entirely appropriate for the BSB to review whether or not the applicable rules and guidance remained fit for purpose. As an independent regulator the BSB must act without fear or favour and any appearance of a correlation between the position taken by the BSB and government policy was purely co-incidental. At no time was the BSB involved in the decision by the LAA, nor was it in any way prevailed upon to issue the consultation, nor did it act with the intention to support or bolster the government's position.

Timing and length of the Consultation

46. As the consultation opened at the end of March the period encompassed the Easter holiday. It was the view of a number of responses that the timing and length was significant as it was less likely that individuals and their representative bodies would be in a position to formulate a considered response over the holiday period.

47. At a time of change and uncertainty in the legal services market it is essential that regulators respond to new challenges and risks to ensure the long term public interest. Following the announcement by the LAA in November 2013 of significant changes to its VHCC and fee structure, the BSB issued interim guidance and gave a commitment to consult fully on any changes to the new Handbook in 2014. There was no significance in the timing of the consultation and the proposed changes were consulted on following their consideration by the BSB Standards Committee. The length of the consultation period was in line with that of past consultations. In response to a request from a representative body of the Bar, the BSB extended the deadline for submissions.

The Difference between Rules and Guidance

48. The consultation asked for views on proposed changes to guidance in the Handbook at gC87. While the majority of responses recognised that the proposed change was to the accompanying guidance many referred to gC87 as a rule.

49. When the BSB moved to an outcome focused regulation it incorporated a significant amount of guidance into the Handbook to assist members of the Bar in interpreting the required outcomes and rules. While guidance may be used by the BSB in

assessing whether or not a barrister has adequately applied their mind to all the relevant considerations when applying the Handbook, a barrister may still comply with the rules and achieve required outcomes without strict adherence to the guidance. A number of responses referred to the proposed change to the guidance at gC87 as a rule change and therefore their comments on the application of the guidance as a rule. Guidance issued by the BSB is not mandatory and can be departed from in the application of Handbook rules. Barristers who depart from the guidance may be called on to demonstrate that they have given due regard to their duties under the Handbook when applying the rule.

List of respondents

50. The BSB received 240 responses of which 238 were from members of the bar, representative bodies or chambers. A number of responses from the Bar endorsed or otherwise supported the comments made by their representative body or chambers. The remaining two responses were from an individual member of the public and an LLP.

Representative bodies and Specialist Bar Associations:	**Circuit Responses:**	**Chambers Responses:**
• Technology & Construction Bar Association • Personal Injuries Bar Association • The Chancery Bar Association • The Honourable Society of the Inner Temple • The Commercial Bar Association (COMBAR) • The Bar Council • The Criminal Bar Association	• The Northern Circuit • Western Circuit • South Eastern Circuit	• Guildhall Chambers • No. 1 High Payment Chambers • Artesian Law • 39 Essex Street • 3 Paper Buildings • Charter Chambers • Garden Court Chambers • 2 Bedford Row • One Paper Buildings • Albion Chambers • Bank House Chambers • No. 1 High Payment Chambers • 9 - 12 Bell Yard • St Ives Chambers • 25 Bedford Row • Guildhall Chambers • 2 Pump Court • Guildhall Chambers • Red Lion Court Chambers • Lincoln House Chambers • No. 1 High Payment Chambers

		• Crown Office Chambers • 1 Pump Court Chambers • The Tim Collins Consultancy • 39 Essex Street • St Ives Chambers • 1 High Pavement • Fountain Chambers

Individual Responses were received from members of the following chambers:

• 1 Gray's Inn Square • 1 Inner Temple Lane • 1 Pump Court Chambers • 10 King's Bench Walk • 12 College Place • 187 Fleet Street • 2 Bedford Row • 2 Dr Johnson's Buildings • 2 Kings Bench Walk • 2 Pump Court • 23 Essex Street • 25 Bedford Row • 3 Paper Buildings • 1 Paper Buildings • 3 Temple Gardens • 36 Bedford Row • 37 Park Square Chambers • 39 Essex Street • 4 Kings Bench Walk • 4 Pump Court Chambers • 49 Chambers • 5 Pump Court • 7 Bedford Row • 9 Bedford Row	• 7 Harrington Street Chambers • 9 - 12 Bell Yard • 9 King's Bench Walk • 9 Park Place Chambers • Albion Chambers • Artesian Law • Bank House Chambers • Byrom Street Chambers • Furnival Chambers • Staple Inn Chambers • Carmelite Chambers • Charter Chambers • Chavasse Court Chambers • Citadel Chambers • Cornwall Street Chambers • Crown Office Chambers • Deans Court Chambers • Dere Street Barristers • Devon Chambers • Exchange Chambers • Farringdon Law • Fountain Chambers	• Garden Court Chambers • Garden Court North • Guildhall Chambers • Harrington Street Chambers • Kings Chambers • Lincoln House Chambers • New Park Court Chambers • No. 1 High Pavement Chambers • Deans Court Chambers • Red Lion Court Chambers • Sovereign Chambers • St Ives Chambers • St Paul's Chambers • Atkin Chambers • Hardwicke • Exchange Chambers • Westbourne Chambers • Woolwich Crown Court • Zenith Chambers