Response to the MOJ consultation on the Quality of Advocacy

16th November 2015

Introduction

1. The South Eastern Circuit (SEC) represents over 2,000 employed and self-employed members of the Bar with experience in all areas of practice and across England and Wales. It is the largest Circuit in the country. The high international reputation enjoyed by our justice system owes a great deal to the professionalism, commitment and ethical standards of our practitioners.

2. Following the publication of the independent Review of Criminal Advocacy by Sir Bill Jeffrey, the government has issued a consultation on the Quality of Advocacy. The government is seeking views on:
    a. The proposed introduction of a panel scheme – publicly funded criminal defence advocacy in the Crown Court and above would be undertaken by advocates who are members of this panel;
    b. The proposed introduction of a statutory ban on referral fees;
    c. How disguised referral fees can be identified and prevented?
    d. The proposed introduction of stronger measures to ensure client choice and prevent conflicts of interest.

3. On behalf of the South Eastern Circuit, we welcome the opportunity to contribute to this crucial debate. We do so in what is intended to be a non-partisan spirit where the interests of the lay client and in turn the public remain at the core of our responses.

Executive Summary

4. The vast majority of solicitors and barristers who work in the Criminal Justice System are committed to providing the best representation and in doing so acting in the interests of their clients. Any practices that serve to frustrate informed and free client choice are to be deprecated. Such practices serve to undermine the profession in the eyes of the public. It is in our collective interests to underscore the importance of quality, choice and transparency. Ultimately, it is in the lay clients' interests, which as practitioners we all recognise are paramount.

5. The overriding consideration is to ensure quality of advocacy/representation irrespective of which branch of the profession the advocate comes from. The Bar does not in principle object to a panel scheme designed to uphold standards of quality, where such a scheme does not interfere with their right fearlessly to represent the defendant.

6. The South-Eastern Circuit supports the development of a panel scheme for criminal defence advocates as being one mechanism by which market forces could be assisted to ensure appropriate representation is obtained in the Crown Court. It would not be appropriate for the Legal Aid Agency to be responsible for the selection and assessment process. Such a panel scheme should impose the minimum possible administrative

burden to keeps costs down and win the confidence of participating advocates.

7. It is submitted that any panel scheme should not impinge upon the flexibility of advocates to undertake cases outside their home circuit.

8. The South-Eastern Circuit is of the view that places on panels should be unlimited at every level. This model allows market forces to operate unhindered by any artificial interference in the form of any arbitrary restriction on numbers.

9. We believe that referral fees, (albeit limited to a small number of litigators/advocates) are a threat to the quality of advocacy and therefore contrary to the interests of public. The excellence of the advocate, rather than economic criteria, should be what motivates litigators to instruct/brief a particular advocate. It cannot be right that an advocate should pay the litigator a percentage of the advocacy fee in exchange for being instructed. It presents a clear financial conflict of interest and is conducted without the knowledge and permission of the law client. We welcome the Lord Chancellor's desire to confront this threat through a statutory ban.

10. The South-Eastern Circuit supports measures that serve to ensure lay clients are able to make informed choices. It is good practice that such advice be documented and that the process be objective and transparent.

11. We agree that it is imperative that action be taken to prevent conflicts of interest arising from financial incentives. The consultation paper suggests

that one option could be to restrict the instruction of in-house advocates within the same firm as the instructing litigator. The South-Eastern Circuit considers that such a measure is disproportionate in the current market. We consider that other measures, which provide transparency and documented advice as to the independent choice of advocate available to the lay client, are more appropriate.

Consultation Response

Q1: Do you agree that the government should develop a Panel scheme for criminal defence advocates, based loosely on the CPS model already in operation? Are there particular features of the CPS scheme, which you think should or should not be mirrored in a defence panel scheme?

12. When justice is achieved through an adversarial process it is axiomatic that if justice is to be achieved there must be equality of arms. In publicly funded advocacy market forces are supposed to be the guarantor of equality. As this consultation rightly identifies, by reference to Sir Bill Jeffrey's thorough and impartial review, there is good cause to believe that equality of arms is not, in many cases, being guaranteed or implemented.

13. Within the Crown Court there are numerous audiences for criminal advocacy however there is only one person whose liberty is dependent on its quality, and that is the defendant. Not all recipients of criminal defence advocacy services are well placed to assess the quality of those services. Difficulties with literacy, language skills, mental health problems and other factors combine to make many defendants in Crown Court proceedings utterly reliant upon their lawyer without the benefit of

knowing whether that reliance is well-placed. A client's ignorance about a better alternative and anxiety about alienating the advocate through criticism can mean that inadequate advocates are not marginalised by market forces.

14. If market forces are not promoting the most experienced and skilled advocates, then private and public harm is caused. Private harm is caused to defendants whose cases are not being advanced properly. Public harm is caused to the reputation of the Criminal Justice System both domestically and internationally. The public purse does not obtain value for money. The risk of miscarriages of justice proliferates, resulting in an inversion of the Overriding Objective of the Criminal Procedure Rules: the innocent are convicted and the guilty acquitted.

15. An unskilled or inexperienced advocate takes bad points, wasting court time, and fails to take good points, exposing the defendant to wrongful conviction. Correcting miscarriages of justice in the Court of Appeal is a time-consuming and expensive undertaking that erodes public confidence.

16. A rarely acknowledged dimension of a skilled criminal advocate's powers of persuasion relates to advocacy practised upon the client. A defendant facing a *serious* allegation where the evidence is strong needs robust advice from an advocate with sufficient experience to give that advice credibly and compellingly. If that advice is accepted a trial is averted, a victim spared the trauma of oral testimony, and a discount is available on sentence. Very significant sums of public money are saved when senior advocates can look clients in the eye and tell them what they need to hear,

not what they want to hear. Imparting that kind of advice is not easy and it is not for novices uncertain of their skills, knowledge and experience.

17. The South-Eastern Circuit supports the development of a panel scheme for criminal defence advocates as being one mechanism by which market forces could be assisted to ensure that appropriate representation is obtained in the Crown Court. It would not be appropriate for the Legal Aid Agency to be responsible for the selection and assessment process. Such a panel scheme should impose the minimum possible administrative burden to keeps costs down and win the confidence of participating advocates.

18. The introduction of the CPS scheme was a fairly controversial development among the providers of prosecution advocacy. One of the concerns expressed then was that a paper-based application exercise presented a danger of failing to identify those skilled in oral advocacy. That concern overlooks the fact that a skilled 21st century advocate must be as adept at written advocacy as well as oral persuasion. A proper application process will ensure that evidenced satisfaction of core competencies is at its heart, with references attesting to the individual advocate's skills and experience.

19. One question to be considered is whether any defence scheme should reflect the CPS' maintenance of specialist panels. It may be felt that a multiplicity of panels would add costs and unnecessary complexity to any panel scheme, with negligible benefits for ensuring the quality of criminal defence advocacy. Furthermore, with the implementation of compulsory vulnerable witness training, combined with appropriate grading for

sexual offences, it should not be necessary to create a panel of specialist rape defence advocates.

20. With that particular caveat in mind and a need for a clearly identified timetable for renewal of an application to the panels it is submitted that the CPS scheme has achieved its objectives ensuring that the advocates on their panels are of sufficient calibre and experience. The usefulness of the CPS panel scheme suggests that a defence equivalent could materially improve the provision of criminal advocacy.

Q2: If a panel scheme is to be established, do you have any views as to its geographical and administrative structure?

21. Simplicity of administration must lie at the heart of any panel scheme. Flexibility must also not be sacrificed. At the moment a criminal defence advocate can practise without restriction in any part of the country. It is submitted that any panel scheme should not impinge upon the flexibility of advocates to undertake cases outside their home Circuit. The entrenching of unhelpful local practices is prevented when a regular supply of outside advocates is permitted.

22. The identification of home Circuits consistent with the CPS panels would seem to be a sensible component of any proposed scheme but without any prohibition on advocates working elsewhere. In reality cost and travelling time act as a significant disincentive to advocates to the development of practices far from their home Circuit.

23. The creation of a national scheme with Circuit-by-Circuit administration would seem to be a sensible way of amalgamating administrative savings with locally knowledgeable assessment. As to the composition of local selection boards for each panel, we think it would be appropriate to have a senior or Resident Judge, sitting alongside the Circuit Leader or his/her delegate, together with a senior solicitor representative.

Q3: If we proceed with a panel, do you agree that there should be four levels of competence for advocates, as with the CPS scheme?

24. Harmonisation of levels would be entirely appropriate. Advocates who prosecute are now familiar with the levels under the CPS scheme. Furthermore the CPS is responsible internally for allocating their cases to a particular level. A clear administrative saving would apply if any defence panel scheme simply adopted the allocation made by the CPS.

25. As already stated, equality of arms lies at the heart of the fair administration of an adversarial system of justice. If different panel levels are operated by the defence and the prosecution it will be harder to discern whether cases are being contested by advocates of similar levels of skill and experience.

26. The virtue of the CPS scheme is that Level 1 advocates are entitled to appear in the Crown Court but normally would not be entitled to undertake jury trials. This means that advocates are able to gain exposure to Crown Court work without succumbing to temptation, or indeed pressure, to undertake work beyond their skill and competence. Level 1

as it currently operates under the CPS scheme essentially functions as a probationary period before advocates 'graduate' to simple jury trials.

27. The South-Eastern Circuit is not aware of any criticisms of the CPS Panel Scheme regarding the existence of four panels (rather than three or five, for example). Under the CPS scheme Silks and Treasury Counsel prosecute cases outside the scheme, and a similar arrangement should apply under any defence panel scheme.

28. The criteria underpinning each level of the scheme will have to be adapted to reflect the different requirements and duties of defence and prosecution advocates. Scrutiny of level applications, as with the CPS scheme, should be performed by members of the judiciary and senior members of the professions.

Q4: If we proceed with a panel, do you think that places should be unlimited, limited at certain levels only, or limited at all levels? Please explain the rationale behind your preference?

29. The South-Eastern Circuit is of the view that places on panels should be unlimited at every level. This model allows market forces to operate unhindered by any artificial interference in the form of any arbitrary restriction on numbers.

30. A restriction on numbers is likely to create significant uncertainty in the legal profession and will place some chambers or solicitor firms at real risk of closure. Furthermore, restrictions are is likely to have a

disproportionate impact on BME practitioners, many of whom practise exclusively in defence work.

31. A panel limited in number was one of the suggestions made by Sir Bill Jeffrey as a means to address a perceived over-supply of advocates. In that respect it would amount to a direct manipulation of the market. Arguments in favour of such a proposal include creating an environment in which only the very best and skilled advocates are in fact able to practise as defence advocates, regardless of the numbers that undertake the minimum required training. Allied to this is the suggestion that it would be a mechanism to winnow out advocates who are failing to improve their skills and develop their practices.

32. It is the view of the South-Eastern Circuit that this would be a blunt instrument that would be unlikely to achieve the stated objectives. Training, in conjunction with panel grading, is far more likely to achieve those objectives without de-stabilising the market.

33. As the Consultation Paper sets out, under the CPS scheme, there is no limit at Levels 1 & 4. Caps exist at Levels 2 & 3, which are broadly intended to reflect CPS business need. Among the reasons the CPS introduced a panel scheme, beyond the obvious benefit of promoting transparency in the allocation of prosecution work, was a concern that the CPS records of external advocates used were incomplete and out of date and focused too narrowly on a limited number of suppliers.

34. A concept such as 'business need' is a more vexed issue when applied to a defence panel scheme and there is a compelling argument to be made that

any advocate who satisfies required competences should be entitled to appointment to the level applied for.

35. It is not envisaged that appointment to a panel under a defence scheme should carry any guarantees or expectation of career development under the scheme. In other words appointment to a defence panel should entitle an individual advocate to practise at that level (or below), but exposure to work and opportunities for instruction will continue to be a matter between advocates and their clients, whether professional or lay.

36. It is important that the innovation in the practice of law retains the confidence and support of practitioners. A disproportionate measure such as arbitrarily limiting numbers of advocates inevitably will result in a wholesale loss of goodwill. A further factor to consider is that the cost of any scheme will spiral, as the appeal process inevitably will be placed under intense pressure.

Q5: Do you agree that the government should introduce a statutory ban on "referral fees" in publicly funded criminal defence advocacy cases?

37. The existence of referral fees is an issue raised by both the Bar Council and Law Society during the Jeffrey Review. Referral fees by their very nature are covert and difficult to quantify. The South-Eastern Circuit recognises that the majority of solicitors/litigators instruct an advocate in an entirely proper fashion. The practice of referral fees, although limited to a minority of practitioners, cannot be justified in any circumstances.

38. We believe that referral fees are a threat to the quality of advocacy, and therefore contrary to the interests of public. The excellence of the advocate, rather than financial factors, should be what motivates litigators to instruct/brief a particular advocate. It cannot be right that an advocate should pay the litigator a percentage of the advocacy fee in exchange for being instructed. It presents a clear financial conflict of interest and it probably occurs without the knowledge and permission of the lay client. We welcome the Lord Chancellor's desire to confront this pernicious practice.

39. The consultation paper defines referral fees as "fees paid, by an advocate, in exchange for instruction." Such arrangements may already be covered by the Bribery Act 2010 (a position supported by the relevant sections of the guidance of both the Bar Council and the Bar Standards Board). Prosecutions under the Bribery Act have, of course, been infrequent. It may be that there has been a shortage of whistle-blowers coming forward. The same problems could well apply to referral fees, were the Bribery Act deemed to be the appropriate statutory power.

40. The Lord Chancellor in utilising s56 LASPO 2012, complements the existing law in imposing a specific statutory ban that is tailored to the specific conduct of referral fees.

Q6: Do you have any views as to how increased reporting of breaches could be encouraged? How can we ensure that a statutory ban is effective?

41. It is (to state the obvious) unlikely that, after an advocate has paid a referral fee to a litagator, either party will volunteer the information to

anyone. It is envisaged that a statutory ban will emphasis how serious this conduct is being treated. Furthermore it will serve to underscore the Codes of Practice, which require a barrister to report misconduct by another barrister.

42. One other measure, which might assist, is a profession-wide duty to report referral fees, as opposed to the current Code of Conduct which (broadly speaking) only require barristers to report other barristers, and solicitors other solicitors.

Q7: Do you have any views about how disguised referral fees could be identified and prevented? Do you have any suggestions as to how dividing lines can be drawn between permitted and illicit financial arrangements?

43. This is a problematic area. It seems to us that the arrangements covering barristers working within solicitors' firms as in-house employed counsel may constitute referral fees, since many such barristers are not salaried, but work on a percentage basis. A payment to secure instructions for a case is and should not be permissible. There needs to be greater clarity of what such an advocate pays and what any payment is for.

44. Further, it seems to us that a ban would need to apply to all barristers (whether employed or self-employed), and – in the interest of fairness – to solicitor advocates, whether freelance or in-house.

45. This would be highly controversial, since – at present – SRA rules give solicitors a greater degree of latitude in engaging in business practices which, on one view, could amount to referral fee arrangements; the same

behaviour is permissible for one branch of the profession but not the other.

Q8: Do you agree that stronger action is needed to protect client choice? Do you agree that strengthening and clarifying the expected outcome of the client choice provisions in LAA's contracts is the best way of doing this?

46. The government's recognition of the importance of client choice as a component of an effective and fair justice system is welcomed. The proposal to introduce stronger measures to protect client choice and safeguard against conflicts of interest is both important and necessary.

47. Stronger action is not only needed to protect client choice but to *provide* client choice. Measures are required which empower clients to make informed choices about their representation as opposed to following advice blindly.

48. Client choice is fundamental to an individual's right to a fair trial, as enshrined in Article 6 of the European Convention of Human Rights 1950:

    'Every individual charged with a criminal offence has the following minimum rights…to defend himself in person or through legal assistance of his own choosing…'

49. Accordingly, client choice goes to the heart of the right to an effective defence. It properly facilitates an individual's preparation of and participation in their own criminal cases. As such the South Eastern Circuit agrees that clarifying and strengthening the client choice

provisions in LAA contracts is one step forward in securing this.

Q9: Do you agree that litigators should have to sign a declaration which makes clear that the client has been fully informed about the choice of advocate available to them? Do you consider that this will be effective?

50. The South Eastern Circuit recognises that many litigators when instructing an advocate of their choice, be it in-house or externally, do so for the right reasons. Any additional requirement in signing a declaration, in those circumstances, merely serves to document that advice.

51. It is good practice that litigators should be required sign a declaration making it clear that clients have been fully advised about the choices of advocate available to them. At present solicitors under the SRA Code of Conduct are required to ensure that *'clients are in a position to make informed decisions about the services they need, how their matter will be handled and the options available to them.'* It is not clear however, how this outcome is achieved. There are no prescribed steps in place that need to be taken.

52. Para 5.8 in the '*Independent Criminal Advocacy in England and Wales, May 2014 Review by Sir Bill Jeffrey*' suggests that the requirement as it stands *'implies at least a conversation between solicitor and client about the advocacy options available and their respective merits.'*

53. The requirement to complete a signed declaration instantiates the obligation upon litigators. It would confer an identifiable and positive duty upon litigators, which would be capable of being monitored. It also provides a focus as to the nature and extent of advice that should be given.

54. The efficacy of such a requirement is dependent on various factors including:
    a. The content of the declaration;
    b. The client's understanding of the advice to which the declaration relates; And
    c. The sanctions for failing to complete the declaration appropriately or at all.

55. To ensure that this requirement is more than a simple 'box ticking exercise', the measure could be strengthened in the following ways:
    a. A requirement of written advice in respect of client choice at the start of proceedings; this was endorsed in the *Criminal Justice, Advocacy and the Bar Review, March 2015* conducted by HHJ Rivlin QC, para 2.20;
    b. A requirement that this advice be included in client care letters sent at the start of criminal proceedings;
    c. Prescribing the content of the advice to include the differences between a solicitor advocate, in-house barrister and a self-employed barrister; And
    d. The reasons why a particular recommendation is being made to the particular client.

56. A suggested formulation of words might include: '*You are entitled to be represented by an advocate of your choice. The options available to you are a solicitor advocate, or a barrister. The solicitor advocate may be from this firm or another firm. A barrister may be an independent member of the bar based in a chambers, in-house counsel or operating as a sole practitioner.*'

57. It is recognised that written advice is not always the most effective for

example for clients who might have literacy or learning difficulties, or no fixed accommodation or chaotic lifestyles. This reinforces the importance of a face-to-face meeting between the solicitor and client at the early stages of the proceedings, for the written advice to be supplemented by oral advice.

58. To accommodate this there could be a requirement of meeting the defendant in person to include oral advice. The declaration ought to contain a pro forma/series of questions that are completed in the meeting confirming:
    a. What advice has been given;
    b. The reasons why the particular advocate was chosen.

59. Lastly there should be a requirement for the declaration to be countersigned by the client.

Q10: Do you agree that the Plea and Trial Preparation Hearing form would be the correct vehicle to manifest the obligation for transparency of client choice? Do you consider that this method of demonstrating transparency is too onerous on litigators? Do you have any other comments on using the PTPH form in this way?

60. The PTPH form would be one vehicle to manifest the obligation for transparency of client choice.

61. The PTPH form could be used in two ways. Firstly, the 'Pre-hearing' section of the form could include a question asking litigators to confirm that clients have been advised about choice of representation. Whilst in

isolation this would be a tick box exercise, the measure would have more force if combined with measures discussed above. The requirement should not be onerous on litigators, as it ought to tie in with the case preparation done prior to the initial hearing in the Crown Court.

62. The inclusion of client choice on the PTPH form would be useful in that it broadens the scope of the obligation properly to advise. It would be a factor not only in the initial solicitor-client meeting but also an issue to which the advocate needs to turn his or her mind at the first court hearing. The advocate would, in completing the form check whether the defendant had been advised.

63. Secondly, a question about client choice could be introduced as one of the judicial warnings that are given at hearings. At present, judicial warnings include: loss of guilty plea credit; the consequences of breaching bail; and the possibility of trial in absence. The idea that this is then concretised through some judicial input is one way of affording proper importance to transparency of client choice. HH Geoffrey Rivlin QC recommended that the Criminal Procedure Rules Committee be invited to encourage judges to ensure that the requirement of advising on client choice has been fulfilled (para 2.21).

64. However, any requirement for judicial intervention in addition to the measures discussed above should not suggest mistrust towards the solicitor branch of the profession. The objective would be to document advice that most solicitors provide routinely and to bring greater transparency to the process. In so doing the interests of the lay client are protected and he or she is made aware of the independent choice of

advocate available.

Q11: Do you have any views on whether the government should take action to safeguard against conflicts of interest, particularly concerning the instruction of in-house advocates?

65. Sir Bill Jeffrey in '*Independent Criminal Advocacy in England and Wales, May 2014'* properly concludes that *'solicitors have a commercial incentive to assign a solicitor advocate to retain the combined value of the fee in house…solicitors are bound, for good reasons, to be influential in the choice of advocate. The fact there are now commercial interests at stake makes it even more important that the process by which an advocate is assigned should be above reproach. This suggests that there would be advantage in reinforcing and clarifying solicitors' professional responsibilities in this area' (Summary of Main Conclusions).*

66. It is therefore imperative that action is taken to prevent conflicts of interest arising from financial incentives.

67. The consultation paper suggests that one option could be to restrict the instruction of in-house advocates within the same firm as the instructing litigator. There are differing views on this matter. As is clear elsewhere in our response, we do not object to solicitor advocates on principle, nor do we seek to make political points against our solicitor colleagues. However, it does not follow that a firm holding a contract for the provision of litigation services is thereby automatically entitled to conduct all of the advocacy in those cases.

68. We note that such an restriction is likely to be impractical, given the

purpose of the provisions that were introduced for the purpose of allowing litigator and advocate from the same organisation to act. Such a restriction suggests that litigators would instead instruct other solicitor advocates (arguably their competitors) or the independent Bar. This could call into question the future of solicitor advocates. Such an approach seems to be a step back in time.

69. The purpose of the changes must be to alert lay clients to the fact that they have a completely free choice as to the advocate who represents them, whether that is a solicitor advocate or a barrister. That choice must be a meaningful one. Clients are not best placed to judge quality, and therefore need to be provided with the requisite information at key stages of the development of their case. The overarching principle in order for conflicts to be avoided is transparency.

70. The consultation paper makes reference to a client's ability *'to make an informed choice of advocate on the basis of clear and impartial advice'* (para 5.8). Arguably, advice coming from a solicitor whose usual practice is to instruct in-house advocates can never truly be 'impartial.' However, imposing the measures discussed provides clear and defined stages, which at least would ensure that advice is *objective* and fact-based.

71. Currently, there is a lack of education and understanding behind the choice of advocates. The proposals outlined above would go some way to empowering clients to truly understand the options available to them and to make informed choices. This is particularly important for those who have little or no experience with the criminal justice system.

72. Ultimately, such conflicts would be avoided if those financial pressures did not exist and criminal work by litigators and advocates was remunerated properly.

Equalities

Q12: Do you agree that we have correctly identified the range of impacts of the proposals as currently drafted in this consultation paper? Are there any other diversity impacts we should consider?
Q13: Have we correctly identified the extent of the impacts of the proposals as currently drafted?
Q14: Are there any forms of mitigation in relation to the impacts that we have not considered?
Q15: Do you have any other evidence or information concerning equalities that we should consider when formulating the more detailed policy proposals?

73. The consultation provides limited information regarding the impact these proposals would have. We consider that any *restriction* on panel numbers will need to be carefully considered, as it is may have a disproportionate effect on BME practitioners.

74. A greater proportion of BME barristers practice in defence-only sets or chose to conduct only defence only work. We make it clear that we have ever confidence in the integrity and efficacy of a panel that are to judge applicants. Nevertheless, there remains a risk that those BME practitioners due to their concentration in this area of work/and specialist chambers will be subject to a greater impact if a restriction on panel numbers is

implemented. There is the dual danger of a practitioner not getting on a panel, coupled significantly with the destabilising effect such changes would have on their set of chambers (where there remains a small pool of defence only sets).

Conclusion

75. There are other measures that could serve to ensure quality of advocacy and greater client choice. Abandoning the warned list system, which often leads to a change of advocate the night before the trial. Some courts have a rolling three-week warned list, which makes it practically impossible for a practitioner to guarantee that they can do the case. This frustrates client choice and leads to delays to the start of trials, as a new advocate takes instructions. There is an increasing tendency for courts to expand the ambit of the warned list system to rape cases and other serious sexual offences, which cannot be justified and is unfair to both defendant and complainant.

76. The Bar remains committed to maintaining the highest standards of advocacy. Measures, which serve to safeguard client choice and allow the lay client to make an informed choice in a transparent fashion, are to be welcomed. The vast majority of solicitors and barristers who work in the Criminal Justice System are committed to providing the best representation and acting in the interests of their clients. Any practices, which serve to frustrate, informed and free client choice, are to be deprecated and serve to undermine the profession in the eyes of the public. It is in our collective interests to underscore the importance of quality, choice and transparency. Ultimately, it is in the lay clients

interests that are paramount.

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