

**BAR
STANDARDS
BOARD**

REGULATING BARRISTERS

International Practising Rules– Consultation Report

**The Bar Standards Board’s response to the consultation paper on
the proposed new International Practising Rules**

January 2012

INTRODUCTION

1. This report summarises the responses received to the Bar Standards Board's (BSB) consultation paper 'International Practising Rules' published in May 2011. It also seeks to respond to some of the comments made by respondents and to demonstrate how the Board's policy position has evolved in light of the consultation.
2. The consultation closed on 29 August and responses have been given careful consideration by members of a working group, by the Professional Practice Team and by members of the Board.
3. 10 responses were received. A list of the respondents is at annex 1 and the original consultation report is available at:

[Closed consultations](#)

NEXT STEPS

4. A joint consultation on entity regulation and a revised code of conduct is due to be issued in February 2012. The revised international practising rules will be included in the draft code which will be published as part of the consultation.
5. The new rules will be introduced as part of the revised code, further details of which will be available in the February consultation.

SUMMARY POLICY DECISIONS

6. The following is a summary of policy decisions taken by the Board in response to the consultation. Where an issue will be subject to further consultation in the forthcoming code/entity regulation consultation, this has been highlighted in the body of the report.

New definitions

- **The current definition of “international work” will be replaced by new definitions of “foreign work”, “foreign clients” and “foreign lawyers” subject to minor revisions as highlighted in the body of the report.**

Application of the cab-rank rule

- **The cab-rank rule will not apply to instructions on non-contentious work from foreign professional clients apart from instructions from professional clients in the EU, EFTA member states and Scotland or Northern Ireland.**

Permissible work and the Public Access Rules

- **Permissible work as described in the consultation paper would create inconsistencies with the Public Access Rules, therefore the Public Access Rules will apply to foreign work as well as to domestic work.**
- **Waivers from the training requirement for Public Access work will be available for those barristers who already have experience of working with foreign lay clients without a professional client.**

Structure of the rules

- **The rules will be integrated into the body of the Code.**

Guidance

- **Guidance will be provided on**
 - **Payment of fees upfront**
 - **Application of the Centre of Main Interests test**
 - **Application of the cab-rank rule**
 - **Public access**

ANALYSIS OF CONSULTATION RESPONSES

Proposed changes to the IPRs

Q1: Do you agree that it is no longer sensible to make distinctions in the IPR based on where the work is done or instructions come from?

7. Part 3 of the consultation paper considered the existing IPRs and how they could be amended so it would be easier to determine the underlying principles. The Bar Standards Board (BSB) proposed that it is no longer sensible to make distinctions based on where work is undertaken and where the instructions emanate from.
8. The majority of respondents agreed that it was no longer sensible to make such distinctions, however the Chancery Bar Association (ChBA) expressed some concerns and stated that the proposed new distinctions may in fact give rise to some anomalies. They also considered that the location where legal services are supplied (which may be at least related to where the work is done) remains relevant, for the purpose of proposed rule 14 and in connection with the provision of advocacy services.

BSB Response

9. The BSB is of the view that it is no longer appropriate to maintain the distinctions discussed above. The rules in their present form have given rise to a number of queries from members of the profession, due to the anomalies and uncertainties they create. Responses to the consultation have been thoroughly considered however, and where it was felt that the proposed new rules did create anomalies, revisions have been made. Details of the revisions are provided in response to the relevant questions below.

New definitions

Q2: Do you agree with removing the current definition of “international work” and replacing this with definitions of “foreign work”, “foreign lawyers” and “foreign clients”?

Q3: If so, do you think the new definitions are adequate?

10. The proposed new rules did not contain a definition of “international work” but instead defined “foreign work”, “foreign clients” and “foreign lawyers”. The BSB considered that the introduction of these three definitions would make it easier to define the circumstances in which the cab-rank and the professional client rules would apply in a more logical and consistent way.
11. Foreign work, was defined as work relating to court or other legal proceedings abroad or, if the matter was non-contentious, work subject to the law of a place outside England and Wales. The definition of foreign clients was taken from the “Centre of Main Interests” (COMI) test from the law of cross-border insolvency. The definition of foreign lawyers was defined in accordance with the definition in the Courts and Legal Services Act 1990 (the 1990 Act).

12. There was some disagreement about the proposed new definitions, each of which is addressed in turn.

Foreign work

13. Whilst most of the respondents agreed with the proposed definition, 4 Pump Court, stated that the applicable law may be a contentious issue. They suggested that the rules should permit a barrister to treat as international work his/her work in relation to any matter or contemplated matter which he/she on reasonable grounds believes to be the subject of the law of a place outside England and Wales when he/she does the work.
14. Monckton Chambers also made a number of comments regarding this proposed definition. They considered that whilst the adoption of “foreign work” rather than “international work” is a clarification, it also places a severe limitation on barrister’s work. The Chambers identified 3 errors in adopting the new definition:
 - i. The question whether English barristers undertaking foreign work should be freed from the requirement which applies in England and Wales to have a professional client and be subject to the cab-rank rule is a question as to the scope of the Code of Conduct. Its answer should not depend upon the varied requirements which may or may not be applied by foreign national legal systems;
 - ii. Reliance upon the existence or content of foreign rules is something that the BSB would find difficult to monitor; and
 - iii. The definition proposed fails to address international advice and representation, including proceedings. The present definition of international work covers important additional areas of work, to which the normal provisions of the Code do not apply and are not appropriate, which now do not fall within “foreign work” as defined. Monckton Chambers stated that these areas of international work (international law, EU law, and English law provided for foreign use) should be expressly included, in addition to “foreign law.” They suggested that the new definition should be supplemented by a definition of “international work” i.e. work involving international law. Further they went on to state that the position of EU law should be recognised by adapting the proposed definition and the same should also apply to the provision of advice on English law abroad. They stated that, thought should be given to how the proposals in the consultation paper tie in with EU rules about the establishment and provision of legal services.

BSB Response

16. The BSB is of the view that if a barrister is giving advice on a matter outside England and Wales they should be aware if in fact the applicable law is that of England and Wales or elsewhere.

17. In response to the points raised by Monckton Chambers, the consultation did in fact propose that barristers should be able to undertake foreign work without having to be instructed by a professional client. The restriction was removed by proposed rule 23.

18. In respect of extending the definition to EU and International law and to the provision of advice on English law abroad, the BSB consider that arbitration and advisory work with a foreign element but subject to English law, should not be foreign work, as EU and International law can form part of English proceedings. The BSB did see the concern around providing advice to a foreign client on matters relating to the application of EU or international law abroad. In light of this concern and for the sake of clarity the BSB will amend the definition to read:

“Foreign work means legal services of whatsoever nature relating to:

1. court or other legal proceedings taking place or contemplated to take place outside England and Wales; or
2. if no court or other legal proceedings are taking place or contemplated, any matter or contemplated matter not subject to the law of England and Wales.”

19. The issue of whether a barrister would be obliged to advise on pure advisory work before any proceedings are contemplated is explored further in relation to the cab rank rule.

Foreign lawyers

20. Whilst the majority of respondents agreed with the proposals, Three Raymond Buildings expressed reservations about the use of this definition. They did not think the definition was adequate and envisaged situations in which instructions could emanate from dual qualified lawyers who, in addition to being members of legal professions within jurisdictions outside England and Wales and practising as such, are also qualified either as solicitors or barristers in England and Wales, although they do not currently practise within this jurisdiction. Three Raymond Buildings thought that the proposed IPRs did not adequately deal with this situation and did not clearly state which rules would be applicable.

21. Similarly the ChBA stated that the definition does not take account of cases where the foreign lawyer has a dual qualification, both in a foreign jurisdiction and in England and Wales. They also commented that the definition applies to individuals and does not deal with the position of firms conveniently. And thirdly they stated that it may be appropriate to exclude from the definition of “foreign lawyer” Scottish and Northern Irish solicitors because they feature in their own right as another category of professional client in the definition of “professional client.”

BSB Response

22. The BSB consider that a distinction should be made based on whether the individual is authorised in England and Wales or not i.e. whether or not they have a practising certificate and that an individual qualified both as a barrister and as a foreign lawyer, should not be able to instruct in both capacities, as this could cause confusion for the client. Therefore a barrister or other authorised person under the Legal Services Act

should not be entitled to instruct as a foreign lawyer. To clarify this, the BSB has decided to amend the definition to:

“Foreign lawyer” is a person who is a member, and entitled to practice as such, of a legal profession regulated within a jurisdiction outside England and Wales and who is not an authorised person for the purposes of the Legal Services Act 2007.”

23. With regards to the position of firms the BSB is of the view that the definition would cover firms, as a “person” could be a corporate entity or a firm.

24. The BSB does not agree that it would be appropriate to exclude from the definition of foreign lawyer Scottish and Northern Irish solicitors just because they feature in their own right as another category of professional client in the definition of “professional client.” This category does not need to be separated as they are in fact, also foreign lawyers.

Foreign clients

25. The ChBA made some useful comments regarding the use of the Centre of Main Interests (“COMI”) definition. They also made the following observations:

- i. The concept originates in international instruments or EU legislation relating to insolvency. It may not be a familiar concept to lawyers practising in other fields.
- ii. The concept is the subject of a reasonably extensive body of case law, including decisions of the European Court. The ChBA stated that although jurisprudence may serve to make the concept more clearly defined, it also means that the definition of foreign client in the Code is not a concept which can be properly understood simply by reading the Code.
- iii. Trying to ascertain the centre of a client’s main interests may be difficult or even an impossible factual exercise for a barrister to undertake. The reported litigation illustrates the extent to which a wide range of information is relevant to determining where the relevant centre is located. The ChBA questioned what steps a barrister would be required to undertake to establish where the client’s centre of main interests is located – they suggested there needs to be a simple route (i.e. certification by the client) on which the barrister can rely.

26. They also suggested that it should be made clear that a foreign client means a foreign lay client.

27. Similarly the Law Society expressed concerns that the COMI test is unclear and likely to be misunderstood. They questioned whether it would be appropriate to apply the law of cross border insolvency, particularly where this may not work well for the wide class of clients that barristers have to deal with. Like the ChBA, the Law Society stated that there may be difficulties about establishing where a client’s COMI is, they also questioned how the rules might apply in an employment dispute involving an English firm with offices abroad where an employee in an overseas office may be able to instruct a barrister directly but an employee in an office in England and Wales might not, possibly over the same dispute.

28. The Law Society went on to state that the questions above could be avoided if the Public Access Rules were to apply to all work undertaken in England and Wales which would avoid the necessity for a definition. If the COMI definition is to be used however, the Law Society were of the view that the BSB should produce guidance in line with the legal precedents to which the consultation paper refers, as well as the guidance provided under Article 3 and Recital 13 of the EC Regulations on Insolvency Proceedings, as both these need to be well understood by the Bar.

BSB Response

29. The BSB sympathise with concerns expressed in using the COMI test to define foreign clients and accept that there could be situations where it would be onerous to apply the test. The BSB considered what connecting factors could be used, for example the use of registered or habitually resident. However, the BSB remain of the view that the COMI test is still the most appropriate test, particularly as the alternative tests which were considered would be equally as difficult to apply.
30. In order to address concerns however, the BSB will issue guidance to help clarify the nature of the test, a list of questions barristers could ask his or her client to help them determine where the client's centre of main interest is.
31. The definition of foreign client will be amended to make it clear that this means a foreign lay client.

Application of the cab-rank rule

Q4: Do you agree with the way in which the cab-rank rule will be applied in the proposed rules?

32. The consultation proposed that the application of the cab-rank rule should be extended to all proceedings in England and Wales, whether instructions come from English, Welsh or foreign lawyers in order to ensure access to justice for all, including any foreigners who may seek it in our legal system. In respect of court proceedings requiring a right of audience, the requirement to involve a solicitor or other authorised litigator in England and Wales will mean that the instructions come from them. The main proposed change therefore concerns instructions from foreign lawyers in relation to advice or other non-court proceedings which would become subject to the cab-rank rule. Conversely it was proposed that the rule should not apply to matters outside England and Wales, which ought logically to be governed by the professional rules of the country administering the local justice system, where the cab-rank rule is largely unknown and its application is therefore not expected.
33. This proposed change meant that instructions from a foreign lawyer with a foreign lay client to advise (or appear in arbitrations or other non-court proceedings) in England and Wales would no longer be included in the definition of foreign work and would therefore be subject to the cab-rank rule in the normal way. This type of work would therefore become obligatory, whereas at the moment a barrister can elect to accept such instructions.

34. Instructions in relation to foreign proceedings from a solicitor in England and Wales to do work for a foreign client and those from any solicitor to do work for an English and Welsh client, in either case where the work is to be done substantially in England and Wales will no longer be obligatory to accept under the cab-rank rule but will still be permissible.
35. There was some disagreement in relation to the proposal to apply the cab-rank rule to instructions from foreign lawyers to do advice or non-court work. Combar stated that the proposal would reduce the English Bar's ability to compete internationally for such work with providers of legal services who are not subject to the cab-rank rule. They considered that such a change is unnecessary as it would not improve access to justice in a context where the client base is not familiar with the cab-rank rule nor looking for providers of legal services who are subject to it; and because there are so many providers of legal services with whom the English Bar is competing who are not subject to the cab-rank rule. 4 Pump Court echoed this view.
36. 4 Pump Court also suggested that in applying the cab-rank rule, one principle to be applied should be that a barrister should not be compelled to accept instructions where he/she cannot be confident of an effective remedy for the payment of fees. With cases involving foreign paymasters difficulties of enforcement may exist. Some jurisdictions have foreign exchange regulations which interfere with the remittance of fees overseas. 4 Pump Court commented that where payment in advance for uncertain volumes of work in a complex case is not practical and where payments to the barrister on account of fees are not permitted, the Code offers no sensible protection for the barrister against the operation of the cab-rank rule. Combar also expressed a similar opinion in relation to non-recoverability of fees. 3 Raymond Buildings suggested that guidance should address this issue and emphasise that under the Code a barrister may require his or her fees to be paid before accepting instructions from a foreign lawyer to provide advisory services
37. Although the BSB Education and Training Committee broadly supported the application of the cab-rank rule in the manner proposed, they also expressed some concerns regarding arbitrations and other court proceedings in England and Wales where the instructions emanate from a foreign lawyer.
38. The ChBA also disagreed with the proposed application of the cab-rank rule. They were of the view that the cab-rank rule should not apply to instructions for any category of work which is given by foreign lawyers. Their main objection to the proposal was, that foreign lawyer's work, by definition, is conducted under different systems of law, regulation and professional standards. In many cases this will not give rise to problems and a barrister will be able to place appropriate reliance and trust on a foreign lawyer from whom instructions are provided. But it cannot be taken for granted that, that will be so in all cases. The Education and Training Committee also expressed similar concerns. The ChBA also gave the following reasons for their objection:
- Foreign lay clients (or home lay clients in disguise) may come to see the fact that a barrister is obliged to act on instructions from a foreign lawyer, in circumstances where a solicitor is not, as an opportunity to obtain, via a

foreign lawyer, English legal expertise (i.e. drafting documents) for the purpose of money laundering or other nefarious activity. The protection which exists where the instructions come via an English or Welsh solicitor will not be present; and a barrister will not be entitled to restrict the instructions he is prepared to accept, to instructions from those foreign lawyers he is willing to trust. Ensuring that the identity of clients is properly ascertained and complying with other requirements of rules relating to the prevention of money laundering is likely to be difficult and time-consuming.

- Difficulty may arise over the recovery of fees, it may not always be possible to quantify in advance what the appropriate fee is and recovery afterwards may be difficult
- The ChBA did not think that the proposed change would improve access to justice in English and Welsh courts but rather will only enable foreign clients to instruct barristers via foreign lawyers. The ChBA were of the view that the proposals are concerned with access to lawyers but not access to the courts.
- The ChBA saw no evidence that foreign lay clients are currently adversely impeded from obtaining advice from barristers or any evidence that justifies imposing a duty on barristers to accept instructions from foreign lawyers to give such advice. They stated that there should have been a stronger justification in the consultation paper.

BSB Response

39. The primary purpose of the cab-rank rule is to facilitate access to legal services in England and Wales for people in England and Wales. In considering whether to extend the rule to other people there is a tension between opening up access to legal services in England and Wales and placing barristers in difficult positions where they are under an obligation to accept work in situations where the lawyers are subject to a different regulatory regime, where the barrister has questions over the standards of conduct of the foreign lawyer, or where they foresee problems obtaining payment from foreign lawyers. It is not easy to strike the right balance.
40. The BSB is not persuaded that to require barristers to apply the cab-rank rule to instructions from professional foreign clients to advice and arbitrations held in England and Wales would place them at a competitive disadvantage in the worldwide market for such work. The BSB would be concerned if one client could prevent a barrister from appearing for a competitor in future on an unrelated matter. Existing conflict rules in the Code of Conduct adequately cover genuine concerns about such situations.
41. The BSB also considers that there are steps which barristers can take to protect themselves financially, for example by setting a fixed fee and requiring payment in advance.
42. On the other hand, the BSB shares the doubts expressed about requiring barristers to act for foreign lawyers about whom nothing may be known and who may be subject to regulatory regimes of varying standards. Barristers in such circumstances

might not be able to obtain reliable information on which to base their advice or might come under pressure to act in unprofessional ways. The cab-rank rule restricts a barrister's normal commercial freedom to decide for whom they are prepared to act. On balance, the BSB has decided that it would be a step too far to apply the rule to instructions from any foreign lawyer. It will, of course, still be open to a barrister to take on the work if he so wishes.

43. Not all foreign lawyers are unknown quantities. In particular, foreign lawyers who are authorised by other Member States of the EU or EFTA, or who practise in Scotland or Northern Ireland, are subject to familiar regulatory regimes of an appropriate standard. Indeed, it would be incompatible with the EU for the BSB to distinguish between instructions from lawyers authorised in different Member States. The BSB therefore proposes to disapply the cab-rank rule from instructions from foreign lawyers except where the lawyers are authorised in another Member State, a EFTA state, Scotland or Northern Ireland.
44. Consultees will have a further opportunity to comment on this proposed change in the forthcoming Code/entity regulation consultation.

Permissible work

Q5: Do you agree that the categories of work which were previously prohibited should become permissible under the new rules?

45. The following work, which is currently prohibited, was proposed to become permissible under the new rules:
- i. Advocacy work preparatory to appearing in Court in England and Wales based on instructions from a foreign solicitor;
 - ii. Advisory work, on an English or Welsh matter, with no instructing solicitor, where the instructions come directly from a foreign client in England and Wales; and
 - iii. Any type of work, on a foreign matter, with no instructing solicitor, where the instructions come directly from a client in England and Wales, with the work being substantially performed in England and Wales.
45. Respondents mostly agreed with the new categories of work that will become permissible under the proposals. The following comments were made with regards to each of the areas:

Advocacy work preparatory to appearing in Court in England and Wales based on instructions from a foreign solicitor

46. The Law Society were concerned that this may cause practical difficulties in terms of continuity and handover of work to solicitors and that there could be significant client detriment if a solicitor is not instructed during the early stages of proceedings. They commented that if this work is to become permissible, further rules and/or guidance will need to be produced to ensure that the quality of work is not compromised.

Advisory work on an English (or Welsh) matter, with no instructing solicitor, where the instructions come directly from a foreign client in England and Wales

47. The ChBA were of the view that this category sits unhappily with the Public Access Rules, as permitting work to be done other than under the Public Access Rules is likely to give rise to very fine distinctions being made between work permissible under this proposed category and work which is subject to the Public Access Rules.

Any type of work, on a foreign matter, with no instructing solicitor, where the instructions come directly from a client in England and Wales, with the work being substantially performed in England and Wales

48. The Law Society thought that the Public Access Rules should apply in these circumstances, as the fact that an individual is deemed to be a “foreign client” does not impact upon whether or not they are vulnerable. They went on to state that given the complex nature of work that might otherwise be conducted by a solicitor, the BSB would need to ensure that any person undertaking this work is appropriately qualified to do so and has a comprehensive knowledge of the relevant areas of law. The Law Society were of the view that appropriate training and regulatory supervision arrangements would need to be put into place to facilitate this.

BSB Response

49. The BSB agree that the rules as published in the consultation would create inconsistencies with the public access rules, making protections for clients inconsistent. Such a policy would imply that protections which are considered necessary for clients in England and Wales, in relation to legal services in England and Wales, are not necessary for either foreign clients or clients in England and Wales in relation to foreign legal work. Such a policy would be difficult to justify. In particular, clients in England and Wales might well be confused if they are required to use a solicitor if employing a particular barrister to do some kinds of work but not for other kinds. The BSB has therefore decided to apply the public access rules to foreign work.
50. In making this decision, the BSB has considered the impact that this will have on barristers carrying out foreign work. We consider the impact to be relatively small, with very little additional burden being placed on barristers. Some 60% of practising barristers are already qualified to do public access work. For the others, in the majority of cases, only a one day public access training course would be necessary to qualify. Those who already have experience of working directly with foreign lay clients may be eligible for a waiver.
51. The BSB is aware that barristers with less than three years experience may be more seriously affected because, under the present rule, they would not be entitled to do public access work. However this rule is currently subject to a separate review.
52. Consultees will have a further opportunity to comment on this proposed change in the forthcoming Code/entity regulation consultation.

Structure of the new rules

Q6: Do you agree with the proposed approach of incorporating the international practising rules into the body of the practising rules?

Q7: Do you think guidance will be necessary to accompany the new rules?

53. Most respondents agreed that bringing all the rules together in one document would be beneficial.

54. Almost all the respondents also agreed that guidance would be necessary. In particular Three Raymond Buildings commented that guidance on the application of the cab-rank rule would be useful and the Law Society specifically mentioned guidance in relation to the definition of foreign client.

BSB Response

55. In light of the comments to the consultation the BSB agree that guidance will be necessary for some areas of the IPRs. In particular guidance will be drafted for:

- Payment of fees upfront
- Application of the COMI test
- Application of the cab-rank rule
- Public access

Content of the new rules

Q8: Do you agree with the content of the new rules?

Q9: Do you have any specific drafting comments?

Q10: Do you think there is anything further that needs to be included in the rules?

56. Respondents generally agreed with the proposed rules. Minor drafting comments will be taken into account in finalising the draft of the new draft Code of Conduct which will be consulted on in February 2012.

Specific drafting comments

57. A number of specific drafting comments were received from 4 Pump Court, the Commercial Bar Association (Combar) and the Education and Training Committee, including:

Rule 24

58. The Education and Training Committee thought further consideration needed to be given to the point at which a solicitor is required and that this point should be defined in the rules.

BSB Response

59. The BSB do not agree that the point at which a solicitor is needed ought to be defined in the rules, as this is something that should reasonably be left to common sense. In any event, requiring the services of a solicitor does not uniquely apply to carrying out foreign work, so it could be argued that such a definition would also be required for domestic situations, which the BSB believe would be inappropriate.

Rule 25.1

60. Combar stated that there should be a change to proposed rule 25.1 to make express reference to any type of alternative dispute resolution proceedings.

BSB Response

61. The BSB do not think that such an addition is necessary, as ADR proceedings will only take place if there is a dispute and a barrister wouldn't be involved in an ADR unless there is a dispute in which legal proceedings are contemplated.

Rule 26

62. 4 Pump Court and Combar both commented that it would run counter to the approach taken to the new rules to apply these exceptions to restrictions by reference to the location in which a barrister actually carries out the work.

BSB Response

63. The BSB has decided to amend this definition in light of the concerns expressed, to include additional wording as follows:

“...foreign work performed by you at or from an office outside England and Wales...”

Additional content

64. 4 Pump Court commented that rule 28 could be amended to consider permitting barristers to hold money on account of fees in the case of foreign work or work done for foreign paymasters.

BSB Response

65. Holding money on account of fees is outside the remit of this consultation exercise. There is no intention to relax the ban on holding client money. The BSB do however, understand concerns in relation to fees and so will be producing guidance on the payment of fees upfront.

Equality and diversity

Q10: Are any of the proposals likely to have a greater positive or negative effect on some groups compared to others? If so, how could this be mitigated?

66. Very little response was received to this question. The Law Society commented, that foreign clients may be vulnerable, and went on to state that the public access rules should be applied as a means of protection of such individuals. Alternatively if COMI

is to be used its application should be tested in relation to specific groups. The Law Society were also of the view that the BSB would need to take account of the fact that foreign clients, who may be from black and minority ethnic backgrounds, are afforded less protection than English nationals.

BSB Response

67. The BSB will be conducting an equality impact assessment generally on the revised Code. The impact of the IPRs will be examined as part of this process.

ANNEX 1: LIST OF RESPONDENTS

Individual barristers

Edmond McGovern
Stuart Pryke

Chambers

3 Raymond Buildings
4 Pump Court
Monckton Chambers

Bar Associations

Chancery Bar Association
Commercial Bar Association

Bar Council and Bar Standards Board

BSB Education and Training Committee
BSB Professional Conduct Committee

Other

The Law Society