PROPOSALS FOR THE REFORM OF LEGAL AID IN ENGLAND & WALES

A RESPONSE TO THE MINISTRY OF JUSTICE CONSULTATION PAPER FROM

GARDEN COURT CHAMBERS CIVIL TEAM

Introduction

1. The Civil Team at Garden Court Chambers consists of 36 barristers who practise in a variety of areas of civil and public law. The team includes practitioners in the areas of social security law (or welfare benefits law) community care, education, mental health, and other areas of civil liberties and social welfare law.

2. We respond below to the proposals to remove welfare benefits law and education law from scope, in answer to **Questions 3** and **49,** and we comment on the implications for welfare benefits law of the narrowing of the scope of the exceptional funding scheme, in answer to **Question 4**.

3. We also respond on the proposal to extend risk-rates, in particular with reference to judicial review (**Question 35),** and the proposal that some legally aided clients may receive telephone advice only (**Question 8)**.

4. In the field of welfare benefits law, members of the team have experience in advising and representing individuals at all levels of the social security appeals system and in the higher courts. Members of the team contribute regularly to the *Journal of Social Security Law* and the *Legal Action Group* magazine; one of our team was a panel member of the former Social Security Appeals Tribunal and our team includes founding members of the *Social Security Law Practitioners' Association*. Members of the team conduct welfare benefits

appeals through the *Bar Pro Bono Unit* and the *Free Representation Unit*, and conduct social security law related judicial review in the High Court and appeals to appellate courts e.g. *R (Gargett) v London Borough of Lambeth* [2008] EWCA Civ 1450, on whether a claimant can be entitled to a discretionary housing payment if he/she in receipt of maximum housing benefit and council tax benefit; *Sandhu v Secretary of State for Work and Pensions* [2010] EWCA Civ 962, on the use of crutches and 'weight bearing', a case which resulted in new guidance being issued on higher rate mobility component of disability living allowance.

5. In the field of education law, members of the team have considerable experience of representing individuals in SENDIST appeals, school exclusions, school admissions appeals and bringing education related judicial review in the High Court, Court of Appeal and Supreme Court e.g. *A v Essex [2010] UKSC 33; [2010] (D) WLR 184,* on Article 2, Protocol 1 and the right of access of a disabled child to an effective education.

The removal of welfare benefits law from scope

Summary of our views

6. In answer to **Question 3**, we do not agree with this proposal. Our reasons in summary are as follows.

   - Appeals to First-tier Tribunals concern the correct interpretation and application of detailed rules of entitlement in a complex area of law, as well as the detailed facts of each case. Without assistance from a specialist welfare benefits advisor many ordinary citizens will be ill-equipped to participate in the appeal process, even taking into account its inquisitorial nature.

- As regards appeals to the Upper Tribunal and to the higher courts, which can only be brought on a 'point of law', an individual who does not have the benefit of legal assistance is almost bound to be at a severe disadvantage.

- Other sources of free advice will clearly not fill the gap and the proposal will produce an inequality of arms between the ordinary citizen and the state.

- Welfare benefits law concerns financial entitlements to meet people's most basic needs. People seek legal advice because they need it in order for their cases to be properly and fairly presented. Our experience as practitioners in this area is that people are all too often caused anxiety, distress and material deprivation over long periods of time due to the lack of timely and effective advice and representation within the social security system. The proposal to remove legal aid very nearly all together from this area will mean that many more people will experience this kind of blight on their lives.

Our reasons in more detail

7. The suggestion that welfare benefits can legitimately be regarded as of low importance because they are "*essentially about financial entitlement*" misses a fundamental point: these are financial entitlements which enable people to meet their most basic needs for food, clothing, heating and other essential living needs or to enable them to cope with illness or disability. As Lord Nicholls stated:

> "Social security benefits are part of an intricate and interlocking system of social welfare which exists to ensure certain minimum standards of living for the people of this country. They are an expression of what has been

> called social solidarity or fraternité; the duty of any community to help those of its members who are in need." [1]

8. As legal aid for welfare benefits law is only provided as Legal Help, the current scheme does not provide legal aid for people appealing to tribunals to have legal representation at the tribunal hearing itself. However, Legal Help provides the possibility of proper advice in advance of the hearing so that an individual's case may be submitted to the tribunal in writing in a manner that addresses the relevant law and the case-law and applies them to the relevant facts. From our own experience in this area, this is input which, in order to be carried out in an effective way, requires legal skill.

9. There is no reasonable prospect that the voluntary sector will meet the need for advice and assistance in welfare benefits law for those who seek it to any significant extent.[2] The idea that the existence of the organisations listed in paragraph 4.218 makes the retention of legal aid in the area of social security law less justified can only be based on a complete misapprehension as to the capacity of these organisations.

10. Contrary to what is said in paragraph 4.218 of the Consultation Paper, social security appeals are not *"suitable for resolution by the Parliamentary Ombudsman"*, as he/she is concerned with the administration of benefits and not adjudication upon them according to the law. Here the Consultation Paper displays a fundamental misunderstanding as to the nature of appeals and the role of the Ombudsman.

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[1] *Regina v Secretary of State for Work and Pensions ex parte Carson & Reynolds* [2005] UKHL 37, [2006] 1 AC 173, para 18.

[2] We note that the Free Representation Unit ("FRU"), one of the voluntary organisations which the Consultation Paper states will be able to step in if Legal Aid is withdrawn (paragraph 4.218) in 2010 managed to cover a total of 539 social security appeals in the Greater London area. When this is compared to the total of 339,200 appeals received by the Appeals Service throughout the United Kingdom in 2009/10 (source Annex B, Tribunals Service Annual Report 2009/10) it plainly represents a 'drop in the ocean'. Moreover, FRU is a second-tier organisation which depends on the existence of first-tier organisations, such as CABs to make the relevant referral in the first place. The same point can be made in relation to the other organisations referred to by the Consultation Paper at paragraph 4.218: CPAG, Disability Alliance and Age UK. These organisations would not have capacity to meet the need for welfare benefits law advice and assistance nationwide for those people who seek it if Legal Help is removed.

11. The Consultation Paper makes much of the "*informal*" and "*user-friendly nature*" of social security appeals tribunals (e.g. at paragraphs 4.10, 4.22 and 4.217), but these characteristics are not enough to overcome the fact that social security law is a highly detailed and technical area of law. The degree of complexity in this area of law is obvious from the source materials alone:

    - "*The Law Relating to Social Security*", containing the current provisions relating to social security (known as the Blue Volumes) – 13 volumes in total;
    - *The Decision Maker's Guide* – 14 volumes in total, plus there are separate guidance manuals for Housing Benefit, Tax Credits and the Social Fund;
    - Child Poverty Action Group's '*Welfare Benefits and Tax Credits Handbook'* (published annually) is 1,600 pages long;
    - CPAG's Annotated Legislation - used by the Tribunal Service, runs into four volumes, and there are additional volumes for Housing and Council Tax Benefit and Child Support;
    - There are reported decisions of the Social Security Commissioners going back to the 1940ies (those from 1991 to 2009 are online);
    - There are currently 3,076 Commissioners' and Upper Tribunal social security decisions available online on the Tribunals Service website; most are decisions issued since 2001.

12. Judges in the higher courts have regularly commented on the complex nature of social security law. Baroness Hale, for example, said (emphasis added):

> "The benefits system is necessarily enormously complex. This was true even in the early days, when it was mainly based on flat rate contributory benefits, and means tested benefits were seen as a safety net but not the norm. It has become even more so with increasing attempts to target benefits upon the most needy. ... **The general public cannot be expected to understand these complexities. Claimants should not be denied their entitlements simply because they do not understand them."**[3]

[3] Baroness Hale in *Kerr v. Department for Social Development (Northern Ireland)* UKHL 23 (reported as R 1/04 (SF), para 56.

Lord Justice Maurice Kay:

> "In the field of social security, primary and secondary legislation are notoriously labyrinthine. Sometimes the substantive entitlement to a statutory benefit is clothed in complexity and can only be determined after an interpretive journey that few are equipped to travel."[4]

and Lord Justice Wall has observed:

> "In my view it remains an apparently non-eradicable blemish on our operation of the rule of law that the poorest and most disadvantaged in our society remain subject to regulations which are complex, obscure and, to many, simply incomprehensible."[5]

13. It is wholly unrealistic to suggest that this is an area of law in which people can simply "*navigate their way through the process without having to rely on a legal representative*" (paragraph 4.22) because proceedings are "*sufficiently user-friendly*". Whilst legal assistance may not be essential in a straightforward case, e.g. a dispute over the amount of a claimant's income, very many cases are not at all straightforward and for the individual concerned who is of limited means and/or ill or long-term disabled, there is a great deal at stake.

14. By way of example, a member of our team recently provided representation at a First-tier Tribunal for a woman who is a migraine sufferer, in relation to the rejection of her claim for incapacity benefit. Under the Consultation Paper's proposals a person in this position would not be entitled to any Legal Help to prepare for their appeal. This individual had suffered daily migraines over many years. Her claim had been rejected on a number of occasions, necessitating appeals. The "all work test"[6] does not expressly identify pain as such as a factor that enables a person to meet the criteria so as to be regarded as incapable of work and qualify for incapacity benefit. However, when correctly

[4] *Secretary of State for Work and Pensions v Borrowdale & Morina* [2007] EWCA Civ 749.
[5] *R (on the application of Gargett) v London Borough of Lambeth* [2008] EWCA Civ 1450, para 36.
[6] Now replaced by the work capability assessment for Employment Support Allowance, in respect of new claims

presented, a claim for incapacity benefit made by a person who suffers frequent and prolonged migraines can succeed, if reference is made to a series of social security commissioner precedent decisions and if the facts of the given case are presented with care. The investigation of the facts of the case and of the relevant law and of how the facts fitted the case-law was not an exercise that the tribunal could realistically carry out at the hearing as part of its inquisitorial function. This individual, like many others, needed legal input in preparation for the hearing of her appeal.

15. Her family members had tried their best to make written representations to the tribunal on her behalf. They had researched the law to the best of their abilities but none of their submissions were of any assistance to her case, as they simply did not have, and could not be expected to have, the legal skills and knowledge that were necessary to identify how to formulate the case.

16. Not only does the case demonstrate the need for Legal Help for individuals in preparation of the cases going before tribunals, but it also shows how social security law is clarified and developed by appeals being properly formulated and argued (whether in written submissions or orally) by representatives with appropriate expertise: the 2 main cases[7] that led to clarification of the law in this area (to the benefit of many deserving claimants of incapacity benefit) were fully argued before the Social Security Commissioners by legally qualified representatives (one of whom is now Queen's Counsel).

17. If a claimant wishes to challenge an unfavourable decision made by a First-tier Tribunal, he or she must obtain permission to appeal, as the Upper Tribunal (Administrative Chamber) (formerly the Social Security Commissioner) can only entertain appeals on a point of law. In addition to needing to submit grounds of appeal, if permission is granted, the Upper Tribunal requires that the parties make written observations on the legal issues raised by the appeal (as the majority of appeals are determined on the papers, without an oral

[7] CIB/14587/1996 and R(IB) 2/99

hearing[8]). The Department of Work and Pensions has a specialist unit which deals with these appeals which, if there is an oral hearing, will often instruct counsel or in-house lawyers who are trained to argue points of law.

18. The concept of 'an error of law' is not something a person without legal expertise can be expected to be familiar with. The higher courts have been at pains to remind lawyers that the jurisdiction of an appellate tribunal is restricted to correcting errors of law. The Court of Appeal[9] has given the following description of common errors of law (which is also applicable to social security[10]):

> "(i) making perverse or irrational findings on a matter or matters that were material to the outcome ('material matters');
> (ii) failing to give reasons or any adequate reasons for findings on material matters;
> (iii) failing to take into account and/or resolve conflicts of fact or opinion on material matters;
> (iv) giving weight to immaterial matters;
> (v) making a material misdirection of law on any material matter;
> (vi) committing or permitting a procedural or other irregularity capable of making a material difference to the outcome or the fairness of proceedings; …

19. Clearly, those seeking advice on taking an appeal to the Upper Tribunal cannot be described as merely "*looking for practical advice*" (paragraph 4.26). They are in real need of the expertise of a lawyer or specialist advisor to draft grounds of appeal which properly identify an error of law. Assistance at this stage is critical because, if the Upper Tribunal refuses permission, all appeal rights will have been exhausted, and a decision to refuse permission cannot be challenged by way of judicial review.[11]

20. We are deeply concerned at the proposal to remove welfare benefits law from scope for all ongoing appeals to the Court of Appeal and the Supreme Court.[12] This proposal will effectively create a situation where only the Secretary of State for Work and Pensions will be able to challenge decisions of the Upper Tribunal to the higher courts.

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[8] In 2009/10 there were a total of 3,700 appeals received by the Upper Tribunal but there were only 192 oral hearings.
[9] *R (Iran) v Secretary of State for the Home Department* [2005] EWCA Civ 982, [2005] INLR 633.
[10] R(I) 2/06.
[11] *R (Cart) v Upper Tribunal and others* [2010] EWCA Civ 859.
[12] Impact Assessment: Scope - Annex 2: Summary of Current and Proposed Positions, page 37.

21. The Consultation Paper is clear that the new exceptional funding scheme being proposed will not compensate for the withdrawal of funding for welfare benefits law when this is removed from scope (paragraph 4.35). Public funding for appeals to the higher courts for social security cases will effectively come to an end, save for cases involving human rights challenges or EU law which represent a small proportion of social security law[13]. We regard the proposal to be a wholly disproportionate denial of access to justice for people of limited means, creating a stark imbalance of power between the individual and the state in this area of law, contrary to the fundamental principles of the legal aid scheme.

The narrowing of the exceptional funding scheme (paragraphs 4.246-4.262)

22. In answer to **Question 4**, we do not agree with the proposal to remove the '*significant wider public interest*' test from the exceptional funding criteria (paragraph 4.252). Its removal would severely limit the number of welfare benefits law cases for which representation before the Upper Tribunal can be funded when the judge has directed that an oral hearing is necessary (as well as cases heard by a three-judge panel because an important issue is raised[14]). If this proposal is adopted, there will be significantly less scope for 'test cases' brought by claimants (with the potential to decide an issue affecting many claimants) before the Upper Tribunal or any other court. In these appeals the only person able to address the judge on the law will be counsel/specialist lawyers acting for the Department for Work and Pensions.

[13] EU cases make up 5% of the case load: source - '*Work and Pensions Committee - Second Report Decision making and appeals in the benefits system'* Annex C: Note of meeting with judges from the Administrative Appeals Chamber of the Upper Tribunal, 22 October 2009.
[14] *Practice Statement (Upper Tribunal: Composition of Tribunal)* [2009] 1 W.L.R. 328, in cases where the Chamber President considers that the matter involves a question of law of special difficulty or an important point of principle or practice.

The Impact Assessment on Scope, Option 7: Remove Welfare Benefits from scope

23. We note and agree with the conclusion on client impacts in the Impact Assessment on scope (paragraph 7.35) that the proposed change to welfare benefits law advice will have a significant disproportionate impact on ill or disabled people, female clients and BAME clients.

24. In answer to **Question 49,** we do not agree that the Government has correctly identified the range of impacts on clients under the proposal to remove welfare benefits from scope. It seriously underestimates the impact it will have on some of the most disadvantaged members of society who are in real need of specialist advice. Its justification rests in large part on the assertion that proceedings before tribunals are designed to be '*user friendly*'. As noted above, this ignores the complexity of many individuals' cases and the denial of access for individuals to pursue their appeals to the Upper tribunals and higher courts that will result from the proposal.

The removal of education cases from scope

25. Also in answer to **Question 3**, we disagree with the proposal to exclude all education cases from the scope of legal aid for the reasons set out below, adopting the reasons given by the Civil Legal Aid Sub- Committee of the Bar Council for disagreeing with this proposal.

26. The right to education and to effective access to the domestic system of education is a fundamental human right under Article 2 Protocol 1. As is clear from the wording of Article 2 Protocol 1, it is also an absolute right. It is a fundamental right under the European Charter on Fundamental Rights: see Article 14. Underlying this fundamental right to education are the best interests of the child. The Consultation Paper proceeds on the misconceived basis of

failing to recognise the importance of effective access to education as crucial to the child's welfare needs, and as a right worthy of effective protection on a par with other basic interests such as personal safety and avoidance of homelessness.

27. Exclusions from school can have a significant impact on a child's future. A disproportionate number of youth offenders have been excluded from school at one time or another, many permanently. Getting the right special educational needs provision also can have a significant impact on a child's future. A disproportionate number of youth offenders also have special educational needs. This is why an amendment has been made to the Education Act 1996 to ensure that those youth offenders with special educational needs have those needs met whilst in custody and for the statement of special educational needs to remain effective when the child leaves custody. This supports our view that education – and effective suitable education – is the cornerstone of a child's development.

28. The contention that litigation arises in education law because of personal choice is also a misunderstanding of the circumstances in which disputes over educational provision for children arise. The example given of a personal choice in the consultation paper is the conduct of children at school. This sweeping statement fundamentally ignores that the behaviour of many children subject to school exclusion is not 'by choice' but directly related to their disabilities. A child with attention deficit and hyperactivity disorder does not choose to have a short attention span or misbehave. A child with Tourette Syndrome does not choose to shout out inappropriate words in class without warning. The example illustrates a misunderstanding of the issues giving rise to education claims.

29. The proposal also misunderstands the nature and complexity of education cases and the disadvantage that a litigant in person - a parent – is at in pursuing an appeal on behalf of the child.

30. That the appellant is the parent cannot found a justification for excluding education cases from the scope of legal aid. As a matter of primary legislation, children do not have standing in their own right to bring an appeal to the First-tier Tribunal or to challenge their exclusion from school. Primary legislation provides only for a right of appeal by the parent. Thus the analysis of the class of individuals bringing these cases is wholly misplaced.

31. Further, whether or not the parent is him/herself a vulnerable person, it is the child who is the subject of the appeal, and he/she is highly likely to be a child with a disability (for example autism, emotional behavioural disorder, Attention Deficit and Hyperactivity Disorder) and special educational needs. It is the child's welfare needs which require the assistance of the publicly funded system. In all other areas of public law children have standing to bring claims in their own names: for example in judicial review proceedings (by way of a litigation friend). That the primary legislation happens to afford only the parent and not the child the right of appeal should not have a bearing on whether this is a class of individuals who would require assistance to present their own cases.

32. At present only those parents who qualify on the means test for legal aid qualify for Legal Help from solicitors who are specialist in dealing with education matters. As these parents qualify for legal aid, self-evidently they do not have alternative sources of funding available to them. Those who do have alternative sources of funding do not qualify for Legal Help. Thus there is no force in any concern as to the already limited funding available in this area being misused.

33. Parents we have represented are frequently themselves quite vulnerable. Some of them have been in the care system themselves; others are disabled and in receipt of community care services from the local authority adult social services. Some have been victims of domestic violence, which in some cases will have been the underlying cause for the child's emotional / behavioural disorder giving rise to special educational needs. Further, some parents are

vulnerable simply by virtue of their being unable to cope with the complex needs of their disabled child whose educational needs require litigation.

34. Thus the impression given by the consultation paper as to the ability of the parent to pursue the child's case misunderstands the reality on the ground in many of these cases.

35. We disagree that in education cases parents are expected only to present the facts to the Tribunal. The law on special educational needs is complex and the case law is still developing even though the system of special educational needs has been entrenched in domestic legislation since the Education Act 1981. The parent needs to understand what is required of him / her to succeed on appeal. This does require a fairly solid understanding of the law in the area which most parents will not have. For example, the law makes a distinction between the correct test and evidence required where the parental preference for a named school in a Statement of Special Educational Needs is for a mainstream school and the relevant test and evidence required where the preference is for an independent school. The evidence produced by the local authority often involves technically complicated information produced by educational psychologists and speech and language therapists as to the cognitive ability of the child. These are factual issues which parents will more often than not be unable to grapple with on their own.

36. Furthermore, complex special educational needs cases can involve threats to life / safety and homelessness. This is particularly true in relation to severely autistic children who require 52-week residential therapeutic school placements. This is rarely, if at all, offered by a local authority following a statutory assessment of the child's special educational needs. More often than not, the local authority will propose a maintained day special school which does not begin to meet the child's needs. The parent will then have to appeal to the First-tier Tribunal. To make good and appeal on the basis that the child requires a 52-week placement, the parent will have to obtain his / her own independent expert reports. This will often involve reports from speech and language therapists, occupational therapists, educational psychologists, clinical

psychiatrists and social work experts. Rarely will a local authority have taken a rounded approach to consult such a wide range of experts. The parent, who has limited funds, will not be able to rely on charitable organisations to arrange such expert reports. Without legal aid, many of these parents will not be able to pursue their appeal in any sensible way.

37. As matters currently stand, legal aid in respect of education cases is already extremely restricted in all aspects of education law, exclusions, admissions and special educational needs appeals. Only limited Legal Help is available. Legal representation at the hearing is often on a pro bono basis. Although it is our view that the existing system is not itself sufficient, to dilute it further would be highly detrimental to the ability of parents and children to access the courts and tribunals in education matters.

38. The coalition government's education policy is founded on inclusion for all children. The free schools policy is to allow children more choice in their education. To exclude education from the scope of legal aid appears contradictory to the coalition government's own policy on inclusion in education.

The proposal to apply risk rates in judicial review after the initial application for permission has been considered

39. In answer to **Question 35**, we do not agree with the proposals to extend the application of risk rates and we endorse the submissions of the Civil Legal Aid Sub-Committee of the Bar Council at paragraphs 189 – 204 of its response, opposing this proposal.

40. We make the following points specifically in relation to judicial review, in respect of which it is proposed that risk rates should apply after the initial application for permission has been considered.

41. We represent many claimants pursuing judicial review claims seeking provision for their most basic needs for shelter and support, community care and mental health services. The public funding criteria we are required to apply as advocates representing legally aided clients are defined in terms of the claimant's prospects of obtaining a substantive order in the proceedings. When a case has reached the post permission stage, the advocate is under a duty to reconsider the merits of the application in the light of the evidence served by the Defendant and, moreover, the duty on advocates to ensure that the public funding criteria are met is an ongoing one. These factors, coupled with the fact that any claim after the permission stage has already been subject to a degree of judicial scrutiny before being allowed to proceed, mean that only cases which are deserving, and which have the required prospects of obtaining a benefit for the client may proceed.

42. Nevertheless, it is inevitable that many claims for which permission is granted and which are entirely appropriately funded in accordance with the Funding Code will not ultimately result in an award of costs in favour of the claimant. We echo the Civil Legal Aid Sub-Committee of the Bar Council's observation, that, if risk rates are to apply post permission, lawyers who act in these cases will be placed in the invidious position of having to accept a disproportionate reduction in their fees overall as a result of taking deserving legally aided cases. Moreover, we agree with the sub-committee that there is a real risk that this very significant extension of risk rates in legally aided cases will operate to discourage advisers from taking on cases which deserve representation.

43. We consider that the proposal has very serious implications for legal aid practitioners and for access to justice. We urge the government to retain the existing £25,000 threshold for the application of risk rates.

The proposal that the Community Legal Advice ("CLA") helpline will be established as a single gateway to civil legal aid services

44. In answer to **Question 7,** we do not agree that the CLA helpline should be established as a single gateway to civil legal aid services. We do not consider that imposing (and implementing over the telephone) a threshold test for being allowed to see an adviser face-to-face is at all appropriate for individuals who need legal advice.

45. Our experience of giving advice to lay and professional clients face-to-face and also, where necessary, over the telephone is that issues are much more likely to be effectively resolved, and more quickly, as a result of a face-to-face meeting. A telephone conference is merely a fall back option if a face-to-face meeting is not practically possible. It is by far the less efficient option in terms of getting to the crux of the issues, and there is no reason to expect that giving telephone advice should take any less of the lawyer's time than a face-to-face meeting. On the contrary, attempting to take instructions and to give advice over the telephone (if it is to result in effectively advising a person on their case) is far more likely to lead to the need for follow up questions and requests for further information after the telephone call.

46. One of the problems of giving advice by telephone is that it is often difficult to gauge whether the client has understood the advice given (even when the client says that he/she has understood). As a result, attempts to give important advice on the telephone can easily be a waste of time, with no effective service having been provided at all.

47. Telephone advice can only sensibly be regarded as a complement to face-to-face advice and not a replacement for it. If there are practical reasons why a client prefers telephone advice then this facility should of course be made available as a matter of choice.

48. We endorse the submission of the Civil Legal Aid Sub-Committee of the Bar Council (paragraph 152) that this proposal has grave consequences for the quality of the service that legal aid will provide.

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