



FACULTY OF ADVOCATES

Faculty of Advocates: Response to request from Department for Business, Innovation & Skills

Introduction

The Faculty of Advocates is the professional body to which Advocates in Scotland belong. By statute, the Faculty has regulatory responsibilities in relation to the Advocate branch of the legal profession in Scotland. At the outset, it must be recalled that the legal profession is subject to a special regime under EU law (Directive 77/249/EEC and 98/5/EC), and the MRPQ Directive is not intended to affect the operation of that special regime (see Recital (42)). In this regard we would simply make reference to the Faculty's comments in previous Responses, namely: the *Faculty Response to the Green Paper on Modernising the Professional Qualifications Directive*, and the *Faculty Response to the Consultation on the Transposition of the Revised Mutual Recognition of Professional Qualifications Directive 2005/36/EC* (copies of both attached). All of the comments below must be read against that background.

Response to specific questions posed:

1. *What are the requirements that a service provider has to meet to access the profession in your area, including any relevant licenses, authorisations and processes. In particular, information is sought on any relevant legal form and shareholding requirements.*

As explained above, the Faculty of Advocates is the professional body for Advocates in Scotland, and has regulatory responsibilities in regard to its members. The Bar in

Scotland is an independent referral Bar, and members of Faculty are self-employed, sole practitioners.

The rules for admission to the public office of Advocate are set out in the Faculty of Advocates' *Regulations as to Intrants*. These Regulations are promulgated under delegated authority from the Court of Session under the *Legal Services (Scotland) Act 2010*, and require to be approved by the Lord President of the Court of Session. The Regulations are readily available, including on the Faculty's website. There are special rules in the Regulations for *inter alia* legal practitioners from other Member States of the European Union. Such persons may be admitted to practice as an Advocate in Scotland upon satisfactory completion of an Aptitude Test alone, without any requirement for additional professional training.

2. *Explanation of how and why these requirements are necessary and proportionate, in line with the principles in the MRPQ Directive and Single Market rules*

Advocates are specialists in pleading before the Scottish Courts, and in particular before the Supreme Courts of Scotland. All of the Faculty's requirements are directed to the particular demands of practice as an Advocate before the Scottish Courts, and the need to ensure: (a) that the public can have confidence in the qualifications of an Advocate to undertake that specialist activity; and (b) that any Advocate is competent to fulfil the responsibilities of an Advocate within the system of administration of justice in Scotland. The Faculty would note that legal practice in a particular jurisdiction requires knowledge and understanding of the law of that jurisdiction. That is particularly true of the type of practice in which Advocates are engaged – which involves representing clients before the Scottish Courts (and particularly the Supreme Courts in Scotland) and giving advice on difficult legal questions. Confirmation that the applicant has a level of knowledge and understanding of the relevant legal system in which they wish to practice is an essential protection for members of the public who require to rely on the Advocate whom they may instruct. Further, in Scotland, the Court relies heavily on the skills and knowledge of those who appear before it in fulfilling its own responsibilities for the administration of justice. Accordingly, the Faculty is of the view that the continued ability to stipulate that an Aptitude Test

requires to be passed by legal practitioners from other EU Member States before they may be admitted to Faculty, is both necessary and proportionate.

3. *Actions that you are undertaking both now and in the future to make it easier to access the profession, including service providers from other EU countries, while maintaining adequate protections where strictly necessary.*

It happens that the Faculty is currently in the process of reviewing its Regulations. In framing revisals, though, the Faculty will reflect the need to protect both those who require the services of Advocates and the administration of justice. For these reasons, the Faculty does not envisage removing the requirement for an Aptitude Test.

4. *How you are engaging with our counterparts across the EU to co-operate on facilitating cross-border movement of professionals – with specific reference to the mechanisms under the MRPQ, such as the European Professional Card, Common Training Frameworks and Common Training Tests.*

The Recitals of Directive 2013/55 state that there is no need for lawyers to be included in the EPC, given that separate regimes for lawyers already exist. In any event, the Faculty has already explained in previous Responses that it is not convinced that the criteria whereby it would be beneficial currently to be included in the EPC are met with regard to the Faculty (see the *Faculty Response to the Green Paper on Modernising the Professional Qualifications Directive*, and the *Faculty Response to the Consultation on the Transposition of the Revised Mutual Recognition of Professional Qualifications Directive 2005/36/EC*).

As noted above, the key issue in the context of the legal profession is public protection, in that the public should always be assured that a practitioner with a professional qualification as a lawyer is competent to practise in the jurisdiction in question. Given the differences between national laws and national legal traditions, any common training principles would have to be framed at such a high level of generality as to be of little or no practical value. Accordingly, the Faculty remains of the view that a CTF or CTT would be unworkable with regard to the legal profession.



FACULTY OF ADVOCATES

MODERNISING THE PROFESSIONAL QUALIFICATIONS DIRECTIVE

RESPONSE ON BEHALF OF THE FACULTY OF ADVOCATES TO THE EUROPEAN GREEN PAPER COM(2011) 367

The Faculty of Advocates welcomes the opportunity to comment upon the Commission's Green Paper setting out options for the modernisation of the Professional Qualifications Directive (Directive 2005/36/EC of the European Parliament and of the Council – "the Directive").

At the outset we make the general observation that the Green Paper contains questions that are not directly applicable to or of relevance to lawyers. There is a specific regime applicable to lawyers in terms of the lawyers' Directives: See paragraph (42) of the preamble to the Directive.

Accordingly we restrict our response below only to those questions that appear to be relevant to the legal profession.

Question 1: Do you have any comments on the respective roles of the competent authorities in the Member State of departure and the receiving Member State?

Question 2: Do you agree that a professional card could have the following effects, depending on the card holder's objectives?

a) The card holder moves on a temporary basis (temporary mobility):

- Option 1: the card would make any declaration which Member States can currently require under Article 7 of the Directive redundant.

- Option 2: the declaration regime is maintained but the card could be presented in place of any accompanying documents.

b) The card holder seeks automatic recognition of his qualifications: presentation of the card would accelerate the recognition procedure (receiving Member State should take a decision within two weeks instead of three months).

c) The card holder seeks recognition of his qualifications which are not subject to automatic recognition (the general system): presentation of the card would accelerate the recognition procedure (receiving Member State would have to take a decision within one month instead of four months).

In general the Faculty considers that a European professional card would be a useful development. The Faculty is however concerned that the proposed shorter periods of time proposed for the recognition procedure may be unworkable given the necessity of carrying out equivalency exercises and assessments on a case by case basis.

Question 3: Do you agree that there would be important advantages to inserting the principle of partial access and specific criteria for its application into the Directive? (Please provide specific reasons for any derogation from the principle.)

In general the legal profession has not approached qualification in a manner which would fit easily with a generalised principle of partial access. Legal questions are not necessarily compartmentalized – for example, a tax lawyer would need to have a good understanding of tax and trust law in order to give competent advice.

Question 4: Do you support lowering the current threshold of two-thirds of the Member States to one-third (i.e. nine out of twenty seven Member States) as a condition for the creation of a common platform? Do you agree on the need for an Internal Market test (based on the proportionality principle) to ensure a common platform does not constitute a barrier for service providers from non-participating Member States? (Please give specific arguments for or against this approach.)Professional qualifications in regulated professions.

In our opinion common platforms cannot work for the legal profession, given the differences between national laws and legal traditions.

Question 6: Would you support an obligation for Member States to ensure that information on the competent authorities and the required documents for the recognition of professional qualifications is available through a central on line access point in each Member State? Would you support an obligation to enable online completion of recognition procedures for all professionals? (Please give specific arguments for or against this approach).

In principle we have no objection to the use of a portal for communication purposes. However, it would be important to ensure that any such portal does not intrude on substantive matters which would affect the autonomy of the competent authority. Consideration of equivalency of qualifications requires to be carried out on a case by case basis. This is particularly the case in relation to the legal profession, the independence of which is of constitutional importance. Decisions which require to be made on a case by case basis do not lend themselves to standardization, and professions vary considerably in that regard. The Faculty has no difficulty with dealing with applications through electronic communications or by use of standardized application processes, but would not welcome the imposition of a process which had not been tailored to the particular circumstances of the legal profession.

Question 11: Would you support extending the benefits of the Directive to graduates from academic training who wish to complete a period of remunerated supervised practical experience in the profession abroad? (Please give specific arguments for or against this approach.)

Since assessments for each such applicant require to be addressed on a case by case basis (Morgenbesser) general rules are unlikely to be feasible unless the general rule is simply that the competent authorities have the responsibility to assess applications on a case by case basis.

Question 24:

Do you consider it necessary to make adjustments to the treatment of EU citizens holding third country qualifications under the Directive, for example by reducing the three years rule in Article 3 (3)? Would you welcome such adjustment also for third country nationals, including those falling under the European Neighbourhood Policy, who benefit from an equal treatment clause under relevant European legislation? (Please give specific arguments for or against this approach.)

In relation to the first part of this question, the issue in relation to the legal profession is about public protection (i.e. assurance to the public that a practitioner who has a professional qualification as a lawyer is competent) rather than a shortage of relevant skill force. As such there is no need to make any such adjustments. In relation to the second part of this question that in our opinion is a policy issue on which it would not be appropriate for us to respond.



Department
for Business
Innovation & Skills

TRANSPOSITION OF THE REVISED
MUTUAL RECOGNITION OF
PROFESSIONAL QUALIFICATIONS
DIRECTIVE 2005/36/EC

CONSULTATION RESPONSE FORM

14 AUGUST 2014

Annex V: Consultation on the transposition of the revised Mutual Recognition of Professional Qualifications Directive (2005/36/EC) response form

Name: **Faculty of Advocates**
Organisation (if applicable): **see above**
Address: **Deans Secretariat, Advocates Library, Parliament House, EDINBURGH, EH1 1RF**

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 06/11/2014

Please return completed forms to:

Francesca Horn
Single Market Team
Department for Business, Innovation & Skills
3rd Floor, Orchard 1
1 Victoria Street
London SW1H 0ET

Telephone: 0207 215 3334

E-mail: MRPQconsultation@bis.gsi.gov.uk

We would like respondents to tick a box from a list of options that best describes them as a respondent. This allows views to be presented by group type.

<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)
<input checked="" type="checkbox"/>	Competent Authority
<input type="checkbox"/>	Trade union or staff association
<input type="checkbox"/>	Other (please describe)

General:

Question 1: Do you agree with our proposal to revoke and replace the current 2007 Regulations rather than amend them?

Comments:

Revoking, and replacing, the current 2007 Regulations would have the advantages of clarity, and accessibility to users.

The legal profession is subject to a special regime under EU law: Directive 77/249/EEC and 98/5/EC. The Directive is not intended to affect the operation of that special regime: see Recital (42). Care will require to be taken to make sure that any implementation of this Directive does not affect that special regime.

European Professional Card (article 4a – 4d)

Page 14

As mentioned previously, the specifics of implementation are difficult to address at this stage as we are awaiting the adoption of an implementing act for the EPC. With this in mind, we have the following questions:

Question 2: Do you have any suggestions for professions that should be included in the EPC?

Comments:

The Faculty cannot offer any comment in respect of other professions. With regard to the Faculty of Advocates, the Recitals of Directive 2013/55 state that there is no need for lawyers to be included in the EPC, given that separate regimes for lawyers already exist. In any event, the Faculty is not convinced that the criteria whereby it would be beneficial to be included in the EPC are met with regard to the Faculty.

In the Faculty's previous Response to the Green Paper on Modernising the Professional Qualifications Directive, the Faculty recognised that there were general benefits to the EPC, but raised concerns as to whether the shorter periods of time proposed for the recognition procedure would be workable, given the necessity, in the particular context relevant to the Faculty, of carrying out equivalency exercises and assessments on a case-by-case basis. The Faculty simply reiterates those concerns here. Were any modified scheme (should that be open to lawyers' participation) to be presented in the future, whether based on the experience of those professions which had been included in the EPC, or the concerns of those professions not yet participating, the Faculty would wish to consider its position afresh.

Question 3: Within the scope of article 4a.7 of the Directive relating to the power to adopt an implementing act, can you suggest any issues that we should be conscious of with regards to the EPC?

Comments:

We refer to our Answer 2 above.

Question 4: *Do Competent Authorities expect the EPC to deliver any cost savings from the transfer of responsibility for checking qualifications to home Member States? Please provide any detail possible on the expected cost implications of the EPC for your authority.*

Comments:

In general, the extent to which cost savings would be delivered would be at least partly dependent upon the extent to which the responsibility for checking qualifications is transferred to the home Member States. The Faculty does not anticipate participation in the EPC for the reasons set out in Answer 2 above. In any event, even were the Faculty to be included in such a scheme, this would not lessen the need for the Faculty to liaise

with foreign Bars (whether in respect of those seeking entry to the Scottish Bar, or those seeking to transfer therefrom): the over-riding consideration, in the context of the legal profession, is public protection – and an assurance that anyone who practices under host state title is competent to practice in the jurisdiction in question. The introduction of the EPC would not, accordingly, deliver cost savings to the Faculty from a regulatory perspective.

Partial Access (Article 4f):

Page 16

Question 5: Bearing in mind the requirements for partial access set out in the Directive (article 4f.1), which professions do you consider eligible for partial access and why?

Comments:

The Faculty cannot offer any comment in respect of other professions. As the Faculty commented in its Response to the Green Paper, the nature of legal practice does not readily accommodate a generalised principle of partial access. Legal questions are not necessarily compartmentalised. For example, a tax lawyer needs to have a knowledge of the law of trusts, as well as the law of tax, in order to give competent advice. An advocate requires to have knowledge not only of procedure and practice in the relevant courts, and skill in the presentation of cases before those courts, but also the ability to deal with disputes involving many different areas of law.

Question 6: Do you think that we should require applicants who wish to access a profession on a partial basis to do so using the title for that profession in English rather than the professional title of their own state? Is the answer different in relation to different professions?

Comments:

The Faculty cannot offer any comment in respect of other professions. We refer to our reservations on the extent to which partial access is suitable for the legal profession (see Answer 5, above). However, were applicants to be allowed to access the legal profession on a partial basis, they ought to use the professional title of their own state, coupled with an indication of the extent of recognition/authorisation. Such a course would be a more accurate representation of the true situation. To allow such persons to use host title designations, such as “Advocate” would be liable to be misleading to the public.

Question 7: Are Competent Authorities able to provide any estimate of the cost of addressing an individual partial access case as well as any costs associated with changes (such as IT systems) to their registers to accommodate partial access?

Comments:

We refer to our Answer 5 above.

Temporary service of provisions (articles 7, 8):

Page 17

Question 8: Do the new requirements for temporary provision require clarification?

Comments:

Article 7(2a), which provides that the submission of the required declaration by the service provider entitles him/her to have access to, or exercise, the service activity in the entire territory of the Member State concerned (subject to the proviso that certain additional information may be requested if *inter alia* the profession is regulated in a different manner in parts of a Member State's territory) requires clarification. Any implementation of this provision must take proper account of the existence of different jurisdictions and legal systems within the United Kingdom.

Question 9: In relation to the option to require a language declaration in relation to professions with safety implication, which professions do you think fall within this description?

Comments:

This relates to other professions, and hence the Faculty cannot comment.

Question 10: Do any Competent Authorities anticipate additional costs incurred from the temporary service provision amendments?

Comments:

For the Faculty itself, as a Competent Authority, any requirement to comply with the temporary service provision amendments would potentially involve some increased cost, given the shortening of the deadlines for the relevant process.

Conditions for recognition (article 13):

Page 18

Question 11: Are the conditions for recognition sufficiently clear?

Comments:

The Faculty notes that it is not asked to comment upon the principle, but simply on whether the conditions are sufficiently clear. In that latter regard, we have nothing to add.

Compensation measures (article 14):

Page 18

Question 12: Although the applicant has the right to choose, Members States' can stipulate, by way of derogation, an adaptation period or aptitude test. Do you think there is a case, in relation to a profession, for expanding the category of cases where we may stipulate either an aptitude period or adaptation test as set out in Article 14.3? If so, please provide reasons for this.

Comments:

The Faculty cannot comment on other professions. We support the continued ability to stipulate that an aptitude test requires to be passed for relevant applications to the Faculty of Advocates. Legal practice in a particular jurisdiction requires knowledge and understanding of the law of that jurisdiction. Confirmation that the applicant has a level of knowledge and understanding of the relevant legal system in which they wish to practice is an essential protection for members of the public.

Question 13: Does applying a compensation measure raise the administrative costs of processing an application?

Comments:

The Faculty refers to Answer 10 above. The shorter the timescales for completion of any part of the process, the more likely that there will be a cost implications for the Competent Authority.

Recognition of professional traineeship (article 55a)

Page 19

Question 14: What limits to the duration of professional traineeships should be set, if any, in relation to a relevant profession?

Comments:

These comments are confined only to admission to the Faculty of Advocates. Advocates are specialists in pleading before the Scottish courts, and in particular before the Supreme Courts of Scotland. The Faculty's requirements are directed to the particular demands of practice as an advocate before the Scottish courts, and the need to ensure that the public can have confidence in the qualifications of an advocate to undertake that specialist activity.

Applicants to the Faculty of Advocates are ordinarily required *inter alia* to complete: (i) a period of training in a solicitor's office approved by the Law Society of Scotland, and (ii) a period of pupillage of up to nine months (known as 'devilling'). Pupillage includes a significant taught element and advocacy skills training, as well as mentored practical training. The rules provide for various exemptions to be granted on a discretionary basis from the ordinary requirements.

There are special rules for legal practitioners from other Member States, and members of the Bars of England & Wales, and Northern Ireland who have undertaken a full pupillage. These may be admitted to practice as an advocate in Scotland upon satisfactory completion of an aptitude test alone, without any requirement for additional professional training

Given the particular focus of the work of advocates in Scotland, the Faculty continues to take the view that the general rule for applicants should be that no more than one-third of the traineeship in a solicitor's office should be spent in a lawyer's office abroad. The nature and purpose of pupillage also means that, ordinarily, this will be undertaken in its entirety in Scotland. However, the Regulations do provide for various exemptions and applicants seeking full or partial exemption from any of the requirements are assessed on a case-by-case basis. The Faculty is currently reviewing its Regulations as to Intrants.

Question 15: Are there any current guidelines on organisation and recognition of professional traineeships?

Comments:

The relevant rules are set out in the Faculty's "Regulations as to Intrants". These Regulations are promulgated under delegated authority from the Court of Session under the Legal Services (Scotland) Act 2010. The Regulations require to be approved by the Lord President of the Court of Session. The Regulations as to Intrants are readily available, including on the Faculty's website. The Faculty is currently reviewing its Regulations as to Intrants.

The Regulations contain the Rules as to the length of traineeship, and period of pupillage, and as to exemptions and the special rules applicable to qualified European lawyers and to barristers from England & Wales and Northern Ireland. The period of training must – subject to the particular provision relating to training in the office of a lawyer in another EU Member State – be undertaken in a solicitor's office approved by the Law Society of Scotland. Pupillage must be undertaken with an advocate approved for that purpose by the Dean of Faculty.

Automatic recognition on the basis of common training principles (articles 49a and 49b):

Page 20

These principles are subject to delegated acts adopted by the Commission. Therefore we are interested in your views in general terms only at this stage.

Question 16: Is the provision for setting up common training principles/frameworks of interest to your profession?

Comments:

No. The key issue, in the context of the legal profession, is public protection, in that the public should always be assured that a practitioner with a professional qualification as a lawyer is competent to practice in the jurisdiction in question. Given the differences between national laws and national legal traditions, any common training principles would have to be framed at such a high level of generality as to be of little or no practical value.

Question 17: Do you consider your profession to be outside the scope of a CTF or CTT and why?

Comments:

Yes. The Faculty is of the view that a CTF or CTT would be unworkable with regard to the legal profession, for the reasons set out in Answer 16 above.

Question 18: Do Competent Authorities expect common frameworks and tests to reduce administrative costs in processing PQD applications?

Comments:

Not applicable – see Answer 16, and Answer 17, above.

Access to information (articles 50.3, 57, 57a):

Page 20

Question 19: Are your procedures already available online?

☒ Yes ☐ No ☐ Not sure

Comments:

The Faculty's "Regulations as to Intrants" (referred to above) are accessible on the Faculty's public access website.

Question 20: Do you accept electronic payments?

☒ Yes ☐ No ☐ Not sure

Comments:

Electronic payments may be accepted, in the form of BACS transfers, and credit card payments made in the course of a telephone call to Faculty staff. The Faculty does not offer the ability for payments to be made through its website.

Question 21: Is your Competent Authority already linked in to the PSC?

☒ Yes ☐ No ☐ Not sure

Comments:

Question 22: Are Competent Authorities able to provide any information about the expected costs and time taken to make available information through the Points of Single Contact?

Comments:

The Faculty can provide generic information very quickly, and will give advice and guidance to any applicant who may contact the Faculty. Consideration of the equivalency of qualifications in the context of the legal profession requires to be carried out on a case-by-case basis: such decisions do not lend themselves to standardization and accordingly the timescales involved will vary.

Question 23: Do any Competent Authorities expect substantive costs to arise from providing electronic application processes? Could you please specify expected costs?

Comments:

Yes. We anticipate that there would be start-up IT costs in offering an electronic application process. The relatively small number of applications which we anticipate would be made in this way, would mean that it would likely take a long time before the initial capital investment could be considered to have been outweighed by the potential benefits of an electronic application process.

Question 24: Do Competent Authorities who have switched to online application systems have any information on the impact this may have had on number of applications?

Comments:

Not applicable.

Exchange of Information (article 56)

Page 21

Question 25: Are you aware of IMI?

☒ Yes ☐ No ☐ Not sure

Comments:

Question 26: Are you registered with IMI?

☒ Yes ☐ No ☐ Not sure

Comments:

Question 27: If you are already registered on IMI:

- a. do you find the system easy to use?
- b. do you find the information exchanged useful?

a. ☐ Yes ☐ No ☒ Not sure

b. ☐ Yes ☐ No ☒ Not sure

Comments:

We have not had sufficient experience in using the system yet to be able to express a view.

Question 28: Do you consider you should be designated as a coordinator? Please provide reasons.

Comments:

We are somewhat unclear as to the meaning of this Question, and so regret that we are unable to offer any comment.

Question 29: Are affected Competent Authorities able to provide more information on how many additional staff may need to use IMI for the alert mechanism and the potential on-going costs of using the system?

Comments:

Were the Faculty ever to be included within the Alert Mechanism scheme, and whilst it is difficult to provide an estimate, we would simply confirm that we would not anticipate a substantial difference in staffing or costs as a result of what is proposed.

Alert Mechanism (article 56a):

Page 22

As with the EPC, the specifics of implementation are difficult to address at this stage as we are awaiting the adoption of an implementing act for the Alert Mechanism. With this in mind, we have the following questions:

Question 30: Within the scope of the implementing act (article 56a.8), can you suggest any issues that we should be conscious of with regards to the Alert Mechanism including:

- Eligible authorities or coordinators
- Procedures on treatment of alerts
- Security of processing alerts?

Comments:

The Faculty is not included within this, and thus cannot usefully comment.

Transparency initiative (article 59):

Page 23

Question 31: Do you have any views on the most effective exercise of the transparency process?

Comments:

This is not really a matter upon which the Faculty can properly comment – other than to observe that the Faculty will provide relevant authorities with information which they may reasonably require.

Question 32: Do you know of any Chartered Bodies that should be either removed or added from Annex I? Please give reasons for your answer.

Comments:

The Faculty cannot comment in respect of other bodies.

Question 33: Do you know of any regulated professions that should either be removed or added from Schedule I? (<http://www.legislation.gov.uk/ukSI/2007/2781/schedule/1/made>) Please give reasons for your answer

Comments:

The Faculty cannot offer any comment in respect of other professions.

Question 34: Has your Competent Authority updated the information on the database (A request to complete the 'Proportionality' tab was sent on 18 July 2014)?

Comments:

Yes.

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply X

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes

☐ No

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Department for Business, Innovation and Skills
1 Victoria Street
London SW1H 0ET
Tel: 020 7215 5000

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