Health and Education Chamber
First-tier Tribunal for Scotland
Additional Support Needs

Tribunal (Additional Support Needs) Forum
28 September 2022, Online
Forum Note

Each year the Tribunal hosts a forum, which provides an opportunity to meet the President and her staff and to discuss topical matters in relation to the Tribunal. The Forum is a valuable information sharing event.

The fifth Health and Education Chamber (**HEC**) Tribunal Forum was held on Wednesday 28 September 2022 via Cisco WebEx, our third event online. Attendance was high and varied, as always, with representatives from child and parent groups, legal and education, social work and health. Our staff also attend the Forum as do a number of our judiciary.

Summary of Topics and Discussions

Chamber President's Update

Attendees heard how the HEC has been journeying through a phasing plan to provide a return to the option of in-person hearings. The President explained her plans for the phasing in of in-person hearings and the different types of hearings, which will be maintained in the future (in-person, remote, hybrid – a mix of remote and in-person). The President provided updates to new or revised President's Guidance (PGN: 01/2021 The Child, Young Person and the Tribunal) and Information Notes (IN: 01/2021: Parties, Witnesses and Supporters). The President discussed the rise in case volume in this reporting year (2022/2023) particularly in relation to placing requests and explained the process for suspensions and extension/shortening of case statement periods, reminding participants that any requests for these must be centered on the facts and circumstances of the case.

Scottish Government

Mr Jerry O'Connell (of the School Funding, Infrastructure and Organisation Team in the Workforce, Infrastructure and Digital Division for the Scottish Government) provided an update on the current situation regarding the proposed transfer of the Education Appeal Committees (**EAC**) to the HEC. The consultation process began in 2019 but was delayed due to the pandemic. The team continue to work on the consultation, but there is currently no clear timescale for its conclusion.

Ms Amy Kirk (of the Tribunals and Administrative Justice Policy Team in the Civil Law and Legal System Division for the Scottish Government) shared that further consideration will be given to the availability of legal aid and the provision of advocacy services should the EAC jurisdiction transfer into the HEC.

Casework Update

The Operations Manager, Miss Elaine Forbes, provided an overview on performance and statistics over the last reporting year. Placing requests continue to be the highest volume of case types and autism remains the principal additional support need.

The casework team have worked hard to continue to provide an excellent service and, as part of the HEC's culture, are always looking for ways to improve. With a sharp rise in applications during this business year, the team have been working extremely hard.

Casework Team Leader, Miss Sarah Tracey, provided some information on the recent expansion of sensory resources, including an update to the website decision database and the creation of animation videos. The team have been working on a number of improvements and updates to processes and resources throughout the year.

Judicial Update

The In-House Legal Member, Professor Derek Auchie, provided a judicial update on current case law (covering claims under the Equality Act 2010 and time bar arguments); flexible use of case types (the use of Equality Act 2010 claims for remedies also available under the Education (Additional Support for Learning) (Scotland) Act (**2004 Act**); and transition references (frequency, different types and relevant legislation and guidance).

Child Parties

Mr Iain Nisbet (Solicitor, My Rights, My Say (Cairn Legal)) shared his perspectives as a child party representative.

1. Chamber President's Update

Hearings *(types and phases)*

Since July 2020 we have been conducting our hearings exclusively remotely. Earlier this year we introduced the first phase of a return to in-person hearings, where the Tribunal members could be together in one hearing room, if appropriate. The second phase will begin on 1 October 2022. This will allow the three members, parties and representatives to attend the hearing in-person, with witnesses continuing to give evidence remotely. This is called a 'phase 2 hearing'.

The third and final phase will see a full return to the option of in-person hearings. There is no current timescale for this phase but it is unlikely to commence in 2022.

During phase 2, and even when we can return to full in-person hearings, remote hearings will remain an option. Remote hearings have proven to be successful on a number of fronts, including for the child or young person. The 'type' of hearing will be discussed with parties at the case management call and the legal member will decide which type of hearing is suitable after taking party views on this.

Guidance on remote hearings remains, for the moment, unchanged. Once we move to the option of a fully in-person hearing, the President will publish new guidance which will include an outline of a suite of hearing types that parties can request.

Information and Guidance Notes

The President has been revising a number of guidance notes:

Information Note 01/2021: Parties, Representatives, Witnesses and Supporters

This Information Note has been revised to provide more information to unrepresented parties. The note will be sent to these tribunal participants in every case (including witnesses).

PGN: The child, young person and the Tribunal

This combines four previous guidance notes into one. It includes a new section on child parties and the importance of recognising their equity with adult parties.

Case Volume, Extensions and Case Statements

Placing Requests

This reporting year, from 1 April 2022, has been the busiest year recorded, to date. We are today only 3 cases short of the whole of the previous reporting year. The PowerPoint Forum presentation will show our figures and trends in more detail.

Suspensions

We have seen a number of lengthy suspensions in recent times. Legal members have been asked to monitor this with care to make sure that these are not unnecessary in length or for inappropriate reasons.

Case management calls will be fixed for the end of a suspension period and any work should be completed by the end of suspension period, ready to continue.

Extension/Shortening of the Case Statement Period

The Tribunal has recently received an increase in requests to extend or shorten a case statement period. This increase has been driven mainly by a desire for a hearing in July or early August to allow for a decision before the next academic year begins. Such a request can be made due to urgency arising from circumstances at any time in the process. If an extension is sought, reasons must be provided that apply to the individual case to justify the request. More general reasons (such as those around the workload of a party or representative) will not suffice.

Paper-apart

A ‘paper apart’ provided by the parent with a reference or claim form could be treated as case statement. This might lead to the legal member waiving the need for the appellant/claimant to lodge a case statement. Instead, the respondent/responsible body would respond to the ‘paper apart’. This saves time.

2. Casework Update

See 2022 PowerPoint Forum Presentation for statistics.

Decisions Database

Following feedback at last year's Tribunal Forum, the casework team has developed a new search function for the decision database. This allows for a search through each decision using case type, individual words or phrases, producing a list of the decisions that meet the search parameters. The team continue to upload decisions as soon as they are authorised by the President for publication.

This improvement to the search function provides stakeholders with a valuable and easy tool to use on the website to enable a speedy search at the click of a button. Guidance on use is available on our website. An accessible guide for children and young people will soon be available on our *needs to learn* website.

Video Animations

Our most recent project to date is the creation of animation videos for children and young people aged 12-15 years, for our *needs to learn* website. The casework team have been working with the President's Office and an external developer to create a suite of animation videos, which will soon be launched, bringing our unique *needs to learn* characters to life to show and explain the Tribunal hearing process.

The aim of the videos is to help children and young people understand each part of the hearing process, what to expect when attending and when speaking at a hearing.

Video 1 – Who are we?

This introduces the three members that make up a tribunal and emphasises their independence. It provides more information about how to find help on the HEC website and the other videos.

Video 2 – Talking at a tribunal hearing

This provides an explanation of the different ways the child or young person can talk to the tribunal members and how they can communicate, in advance and at the hearing. It also provides information on how they can get help to express their views.

Video 3 – Coming to a video hearing

This provides information on what to expect when attending a remote video hearing. It also explains each person's role.

Video 4 – Coming to an in-person hearing

This provides an explanation of who the child or young person will see and what to expect when attending a hearing in-person, including the physical hearing room layout.

The video animations will all include subtitles and British Sign Language.

3. Current HEC Case Law

Equality Act 2010 Claims - *broad scope and remedy powers demonstrated in six HEC decisions since 2021.*

FTS/HEC/AC/21/0058: a claim about access to a school project involving a walk: claim dismissed. One particular issue was considered in this claim.

FTS/HEC/AC/21/0018: a claim dealing with maths tuition during the pandemic; maths grade calculation; consultation with private tutor for estimated grade: claim dismissed. A number of related acts/omissions were argued as part of the same claim.

ASN_D_20_09_2021: a claim where a number of issues were argued, namely: transition process to secondary school; process on application for deferral of a year's education; online teaching during the pandemic; nature of in-class learning support. The claim was dismissed. Here, there were a number of acts/omissions as part of same claim but they were not related.

ASN_D_25_06_2021: a claim revolving around the use of private tutors; evidence of externally produced work; predicted grades. The claim was dismissed. A number of related aspects were argued.

FTS/HEC/AC/21/0072-MERITS: a claim where the tribunal considered the exclusion of a child and use of physical interventions. The claim was upheld and the remedies were a finding of discrimination, an apology, a requirement for relevant staff training and a policy review. This case shows the breadth of remedies available in a claim (2010 Act, schedule 17, paragraph 9(2)).

FTS/HEC/AC/20/0088: a multiple issue claim including early recognition of learning difficulties; diagnosis of dyslexia; differentiated support provision; standard of Gaelic reading and writing tuition; consideration of parental views on education; support during COVID-19 school closures. The claim was dismissed. This decision is as yet unpublished.

Multiple types of discrimination

The use of multiple types of discrimination is common in claims: reasonable adjustment duty, indirect discrimination, discrimination arising from disability, being the three main types.

Unrepresented parties

Where there is an unrepresented party, and where appropriate, a tribunal may invite the responsible body to address alternative discrimination types to include some that are not argued in the case statements (under the overriding objective in rule 2 of the Tribunal rules) to ensure procedural equal footing (rule 2(2)(c)).

Time-bar cases

For references, the point has to be raised by the respondent: rule 14(5)-(7) and rule 56. The test is: is it 'fair and just' that the reference is permitted late? This is similar to the 'just and equitable' test in claims. There is no specific relief power in rule 14, but the power comes from rule 56, which carries a general irregularity waiver power.

For claims, the legal member or tribunal must raise the point even where the responsible body does not. This is due to the wording of rule 61(4) – 'shall not consider a claim'. This wording has been judicially interpreted in other jurisdictions.

There are three possible situations for time bar claims:

1. The claim is lodged later than 6 months after 'the act complained of was done' where there is a single act/omission – it is time barred unless it is just and equitable that the claim is considered although out of time.
2. The claim is lodged later than 6 months after the latest 'act complained of was done' where there is more than one act/omission representing 'conduct extending over a period' (see the EHRC's Technical Guide on what this means. Here, the 6

month period for lodging a claim starts from the date of the last act/omission. The just and equitable test applies to such a claim.

3. Where there is more than one act/omission but there was not 'conduct extending over a period', the just and equitable test applies to each act/omission which occurred more than 6 months before the claim was lodged.

The first stage considers whether the claim is it out of time and if the answer is yes, the second stage is to consider if it is it just and equitable that it is considered.

The 'just and equitable' test, when it applies, is wide (for references and claims) and the main case used is the Court of Appeal's decision in *Abertawe Bro Morgannwg University Local Health Board v Morgan* [2018] EWCA Civ 640 (***Abertawe***) which, when combined with the HEC's rules takes us to these points:

- the discretion is wide and unfettered;
- the absence of an explanation for the lateness is relevant but not determinative;
- key issues to be considered are: the length of the delay, the reasons for it and any prejudice suffered as a result (sometimes called 'forensic prejudice');
- procedural equal footing may be a relevant factor; and
- the general rationales for having time-limit provisions should be considered.

The concept of 'forensic prejudice' is described as prejudice suffered 'if the limitation period is extended by many months or years, which is caused by such things as fading memories, loss of documents and losing touch with witnesses' (Mrs Justice Laing in the EAT case *Miller v Ministry of Justice* UKEAT/0003/15, para 12). This type of prejudice is also referred to by the Court of Appeal in *Abertawe* as 'delay which prevents or inhibits the responsible body from investigating the claim while matters are fresh' (para 19, final part, in brackets).

Some recent examples of time bar decisions of the HEC are:

- HEC/AC/22/0002/PRELIMINARY
- ASN_D_25_06_2021
- ASN_D__14_01_2021

- FTS/HEC/AC/21/0018/PRELIMINARY
- FTS/HEC/AC/21/0072/PRELIMINARY

Flexible Use of Case Types

There continue to be claims under the Equality Act 2010 seeking remedies available under the 2004 Act, including remedies in relation to co-ordinated support plans (**CSPs**) and placing request refusals.

Consolidation

Cases on the 2004 and 2010 Acts can run in tandem and hearings can be consolidated under the Tribunal rules. Hearings can be consolidated for claim and a reference, more than one reference or more than one claim. The cases where hearings are consolidated can be lodged together or at different times. The test for consolidation is generally whether to do so is just and fair. The precise test varies depending on the combination of case types involved and so the Tribunal rules on consolidation (rules 30-31 and 76-77) should be carefully checked.

Transition References

Transition references are the least common of the four main Tribunal case types, but they have been increasing in number. Since the move into the First-tier Tribunal for Scotland in 2018, there have been eight transition references; five of these since April 2021. None of these have proceeded to a hearing.

The relevant provisions of the 2004 Act are: sections 18(3)(g), 12(5)-(6), 13 and 19(3). These provide that by no later than 12 months before the child or young person is due to leave education, the education authority must carry out certain tasks around requesting information from appropriate agencies and seeking views from the child or young person and parents **and** take account of that information and views. This is all with a view to considering the additional support needed by the child or young person during the 12-month period prior to the child/young person leaving school. The authority must also consider any provision it might make upon the child or young person ceasing school education.

In addition, the education authority must, by 6 months in advance of the child or young person leaving school education, provide information to any appropriate agency they think fit on the proposed date of cessation of school and on the additional support needs of the child/young person. The authority must also consider any non-educational provision it is likely to make for the child or young person once leaving school. The views of a child must be taken into account in this process.

The remedy in a transition reference is to require the respondent to take action to rectify any failure to comply with the transition planning duties: this is a broad power, but the remedy must relate to the transition duties.

The 2004 Act Code of Practice contains practical guidance on the transition duties (pages 95-108) and regulations are in place: *The Additional Support for Learning (Changes in School Education)(Scotland) Regulations 2005, SSI 2005/265*. These regulations apply similar duties to those in sections 12 and 13 of the 2004 Act to five additional transition points (that is additional to the transition at the end of secondary school):

- transition to nursery education;
- transition to primary education;
- transition to secondary education;
- transition from one school to another within an education authority; and
- where an education authority ceases to be responsible for education of the child/young person for any other reason.

4. Child Parties

Mr Iain Nisbet, Cairn Legal and *My Rights, My Say*, provided a short talk on child parties. He explained that representing a child party is not much different to representing a parent – the same law applies. The change to allow 12-15 year old children to bring a case on their own behalf is very appropriate and a good thing to be

able to facilitate. The Tribunal, advocacy support and the education authorities have adapted very well to this change.

We should all be very proud of how well this process is going, albeit in small numbers.

There are some significant differences to highlight, as the number of children bringing their own cases to the Tribunal are low and many people will not have been involved in these cases. The *My Rights, My Say* service and the legislation generally does not cover placing request appeals, that remains a parental matter. The service mainly supports CSP references at the Tribunal. These could include challenging a refusal to open a plan, challenging the contents of a plan or raising questions about whether a plan is being properly implemented. Although the plan itself can be quite technical and technical rules apply, the children that the service represent often have a good sense of why they think a plan is something that they want. They also understand the importance of people from different agencies working together in relation to their education and the significance of those things being recorded in a legal document. For most cases that reach a Tribunal stage, the child has already had the benefit of working with one of the specialist children's advocacy workers from *Partners in Advocacy*. The Tribunal stage is not the starting point from the child's point of view.

One of the other differences, procedurally, is a different application form to make a Tribunal reference, specifically for the use of children within that age bracket. It asks more open ended questions and there are large sections to be completed around what the child's needs are and what they would like to happen next. It has space to include details of witnesses and supporters, which normally would come later in an adult party reference. This gives the child an opportunity to set out what they feel is important in a reference at an early stage. The form is usually completed with the child and advocacy worker or a draft may be competed following a telephone or video call or a meeting in-person with the child. We would then go over it with them before it is lodged with the Tribunal.

The big difference is that there are two pre-conditions in this type of case. The child is not allowed to bring a case unless the Tribunal is satisfied that (1) the child has the necessary capacity to do so and (2) taking the case forward would not adversely affect

their wellbeing. I am pleased to say, in practice, this has not proved a barrier to a child being able to access the Tribunal and generally these pre-conditions are able to be dealt with by a short case management call with a legal member. The case can then proceed once the legal member is satisfied on both of those points. The education authorities are often very cooperative in this part of the process and can present their own view as school staff or educational psychologists, who know the child well, are able to give a view on the capacity and wellbeing matters.

With regard to the 'respected' and 'included' wellbeing indicators, it is often a benefit to the child in being able to take the case forward themselves.

There is flexibility in terms of how the child gives evidence at a hearing. It is important to recognise that when a child is bringing their own case, they are giving evidence. That is distinct from taking the views of the child, where a parent brings a case on the child's behalf. It may be given in written form or with assistance from advocacy (which is also an option for parents). The Tribunal are very good at accommodating the child to give evidence in their own way.

When there is a decision in a case involving a child party, alongside the decision there is usually a letter issued to the child which is intended to explain to the child in a less formal way what the decision was and why it had been reached.

Finally, in a child party case, any settlement discussions should be with the child or the child's representative and it is for the child to take a decision on whether they are content with the terms proposed.

5. Enquires to the Tribunal

The following advance enquiries were received (the HEC response is set out in blue):

Question 1 – Cairn Legal

Q. I would be grateful for an update on when the jurisdiction of the education appeal committee is due to transfer to the Health & Education Chamber, and what (if any) arrangements for legal aid/advocacy/representation are likely to be made for such cases.

A. An update on this has been provided by Mr Jerry O'Connell and Ms Amy Kirk, both Scottish Government – see earlier in the note.

Decisions on legal aid/advocacy/representation will be considered if the jurisdiction is to be transferred into the Chamber.

Question 2 – Children in Scotland

Q. I am interested to hear how decisions are made about placing requests for children and young people with Additional Support Needs, what criteria are applied and if these are consistent across Local Authorities.

A. Education authorities have a duty to provide school education. Parents or young people can make a placing request to be placed in a different school to their catchment area school.

The HEC considers references from parents or young people who wish to challenge a decision of an education authority that has refused a placing request. Tribunal decisions are made under sections 18 and 19 of the Education (Additional Support for Learning)(Scotland) Act 2004 ('2004 Act').

Schedule 2 of the 2004 Act sets out the grounds (reasons) that can form the basis of an education authority's decision to refuse a placing request. These grounds apply to all education authorities.

If the tribunal finds that one or more of those grounds for refusing the placing request exist at the time of the hearing and that in all of the circumstances it is appropriate to confirm the refusal decision, the refusal decision will be confirmed (meaning that the child/young person will not attend the school named in the placing request).

If the tribunal finds that none of the grounds of refusal exists at the date of the hearing, the tribunal will overturn the refusal of the placing request and the child/young person will be placed in the school named in the request.

This is the process for all placing request references that come to the HEC.

The process for dealing with placing requests by education authorities is not uniform across Scotland. Sometimes, the question of whether a request made through an internal education authority process is or is not a placing request under the 2004 Act arises. Where this question arises in relation to an HEC reference, it will usually be decided as a preliminary manner.

Question 3 – Children and Young Peoples Commissioner Scotland

Q. Low number of CSPs and how to ensure children have a right to remedy.

A. A co-ordinated support plan (**CSP**) must be prepared when the legal tests in section 2 of the 2004 Act are met. This is the case irrespective of whether the child or young person benefits from any other type of plan, such as an individualised education plan, a child's plan, or any other plan. The legal obligation is not to have 'some kind of plan in place'; if the criteria for a CSP are met, preparing one is compulsory, even if several other plans are in place.

There is no way of knowing how many CSPs are in place at any time, as they do not need to be nationally registered or counted. Previous FOI requests made by Govan Law Centre revealed a patchwork of data for looked after children. Education authorities have a duty to record the number of looked after children in their area and how their additional support needs are assessed (The Looked After Children (Scotland) Regulations 2009 SSI 2009/210, regulations 42 and 43, requiring certain case records to be kept).

On remedy, a reference under the 2004 Act may be made to the Tribunal by a child, young person or parent who seeks:

(a) the preparation of a CSP;

(b) a review of an existing CSP;

(c) the discontinuation of a CSP; or

(d) changes to the content of a CSP.

The Tribunal can order that a CSP is to be prepared, reviewed, discontinued or changed.

Alternatively (or in addition) a child, young person or parent may lodge a claim alleging disability discrimination under the Equality Act 2010 in connection with a decision (or lack of one) about a CSP, or its content (as confirmed by the Inner House of the Court of Session in *City of Edinburgh Council v R* 2018 SC 399). The power to make a remedy on a finding of discrimination under the 2010 Act is very broad, as noted above.

There is information on the HEC's website about how someone can make a reference. This includes information on how a child can make a CSP reference, on our Needs to Learn pages.

More child and young person information needs to be shared so that children and young people know about CSPs, whether they are entitled to one and what to do if one is not provided, or they do not like the content of one already in place. The Scottish Government convened a short-life working group in 2021, following on from the Morgan Review, to look at the provision of information on CSPs, amongst other matters. Draft guidance/information is to be produced by the Scottish Government.

Question 4 – Children and Young Peoples Commissioner Scotland

Q. How to ensure that ASN legislation and its implementation are compatible with public authorities' duties under UNCRC Incorporation Bill.

A. The passage into force of the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill has been delayed following a decision of the Supreme Court issued on 6 October 2021. The Deputy First Minister made a statement to the Scottish Parliament on 24 May 2022, indicating that more consultation will be required in order to make changes to the Bill needed as a result of the court's decision.

The UNCRC may, however, be referred to in HEC proceedings, since it already has status as an aid to interpret the European Convention on Human Rights, which was incorporated into domestic Scots law by the Human Rights Act 1998. HEC Tribunal members have been fully trained on this use of the UNCRC.

The HEC President has closely followed the life of the Bill so far and has commented on its relevance to and impact on the current domestic education legislation applied by the HEC.

Once the UNCRC is incorporated in to Scots law, the President will produce Guidance to members, which will be published alongside other her other Guidance, explaining how the UNCRC is to be applied in our proceedings.

The President's current Guidance (including Guidance to Tribunal Members No 01/2021, *The Child, Young Person and the Tribunal*) has been written to take account of the UNCRC and the UNCRPD.

Question 5 – South Ayrshire Council

Q. When specialist provisions are full and there is no physical space for any more children/ young people, what are the expectations of local authorities?

A. Some of the statutory grounds of refusal of placing requests in schedule 2 of the 2004 Act relate to physical space or to other types of education authority resource. The ground(s) of refusal an education authority relies upon when refusing a placing request is a matter for that education authority, decided in the circumstances of the individual case.

Where a young person or parent challenges that decision through an HEC reference, the tribunal will decide the reference, using the process outlined earlier. That process involves (for the most part) considering, on the evidence and legal argument(s) presented, and as at the date of the hearing, whether or not the ground(s) of refusal (or at least one of them) relied upon by the education authority at the hearing exist.

Each case is decided on its own facts and circumstances. As a judicial body, the HEC cannot set out expectations; it may only apply the law to individual cases within its statutory jurisdiction. However, the President has issued Guidance on pre-hearing

procedure (Guidance to Members 06/2018, *Case Management Call* revision 2, October 2021), remote hearings (Guidance to Tribunal Members 02/2020, *Remote Hearings and the COVID 19 Outbreak*, revised January 2021) and information on how to prepare for a hearing (Information Note 01/2021 *For Parties, Representatives, Witnesses and Supporters*).

Question 6 – Govan Law Centre

Q. The timescale for placing request responses and schools closing for summer often leaves witnesses and documentation unavailable for hearings and children and young people not having a decision on their placement in advance of the new school year in August.

A. The Tribunal rules provide that the month of July does not count for the case statement period. This means that July can be counted for other tribunal procedure/proceedings.

An application to shorten the case statement period may be made by either party at any point. If such a request is granted, this can lead to the case preparation being completed before schools close in late June. The President took this approach to suspended placing requests at the beginning of June 2020, following the first period of national lockdown and school closures. This meant that outstanding case statements were completed before the school term ended in June 2020.

There is nothing in the rules to prevent a hearing taking place in July. However, a practical issue can be the availability of witnesses as many teaching staff in schools are not on contract to work during July. In any event, many teaching staff will have holidays arranged for July. For these reasons, only a few hearings have been scheduled in the month of July.

It is common for hearings to be fixed in early August so that a decision can be issued before the new school year starts. This is aided by the facility for a summary decision to be issued shortly after the end of the hearing, with the full reasoned decision to follow.

The HEC Tribunal rules also provide for the avoidance of delay, as part of the overriding objective to deal with cases fairly and justly (rule 2(2)(e)). A tribunal may issue a range of directions to expedite outstanding matters in a case, such as the provision of education records to the appellant. If an education authority treats this request as a Data Subject Access request, this can delay the provision of critical records.

Factors such as teaching contracts and unavailability of witnesses are not directly within the Tribunal's control. However, the Tribunal will continue to seek a rapid resolution of all cases, taking account of the academic year cycle.

Question 7 – Dumfries and Galloway

Q. To receive an update on current activities for the Tribunal.

1. Hear of latest trends.
2. Receive updates on Tribunal processes.

A. Each point above is covered in the earlier agenda items.

The President concluded the event and thanked speakers, enquirers and those in attendance today, for their valuable engagement and input.