

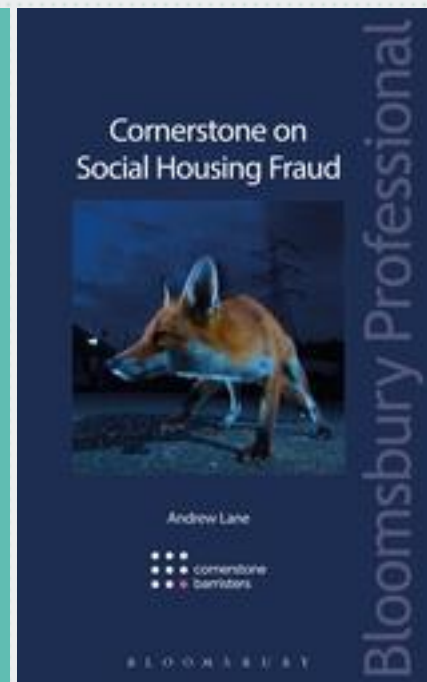
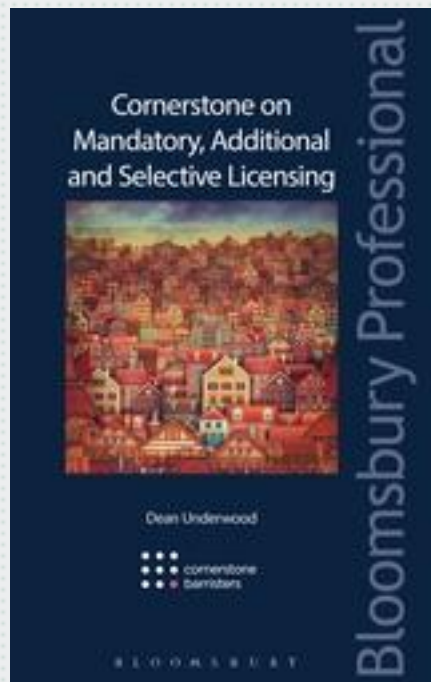


Public law and discrimination challenges to  
possession claims - where are we now?

**8 October 2020**

Cornerstone Barristers  
Housing Week 2020

# Cornerstone Books



# Housing Week 2020



Monday 5 - 11AM - [Looking backwards to go forwards - Housing 2020 and 2021](#) Speakers: Andy Lane, Ruchi Parekh, Catherine Rowlands. Chair: Ranjit Bhose QC – AVAILABLE ONLINE

Tuesday 6th - 3PM - [Dealing with defendants with mental health problems/capacity issues in ASB cases](#) Speakers: Jon Holbrook, Michael Paget, Peggy Etiebet, Tara O'Leary. Chair: Kuljit Bhogal – AVAILABLE ONLINE

Wednesday 7th - 11AM - [Housing-Related Judicial Review](#). Speakers: Catherine Rowlands, Wayne Beglan, Alex Williams. Chair: Kelvin Rutledge QC – AVAILABLE ONLINE SOON

Thursday 8th - 3PM - [Public law and discrimination challenges to possession claims - where are we now?](#) Speakers: Andy Lane, Ryan Kohli, Riccardo Calzavara, Rowan Clapp. Chair: Dean Underwood

Friday 9th - 11AM - [Collection and Use of Personal Data: A guide for Landlords](#). Speakers: Kuljit Bhogal, Matt Lewin, John Fitzsimons. Chair: Matt Hutchings QC

# The Speakers

Dean Underwood (Chair)

Andy Lane, Ryan Kohli

Riccardo Calzavara, Rowan Clapp,



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# Discrimination Defences and Counterclaims

Ryan Kohli

# Introduction



- Remains a very active area: many LA and RP claims for possession defended on this basis.
- Most in social housing have some vulnerability. That is often why they are housed.
- Courts should not be surprised that in certain circumstances a possession claim is a proportionate response.
- What is a disability within the meaning of the 2010 Act?
- What constitutes discrimination?
- How do I deal with counterclaims?

# Disability: Definition



## Section 6 EA 2010

- (1) A person (P) has a disability if—
  - (a) P has a physical or mental impairment, and
  - (b) the impairment has a substantial and long-term adverse effect on P's ability to carry out normal day-to-day activities.
- ...
- (6) [Schedule 1](#) (disability: supplementary provision) has effect

## Schedule 1, Para 2 provides

- (1) The effect of an impairment is long-term if—
  - (a) it has lasted for at least 12 months,
  - (b) it is likely to last for at least 12 months, or
  - (c) it is likely to last for the rest of the life of the person affected.
- (2) If an impairment ceases to have a substantial adverse effect on a person's ability to carry out normal day-to-day activities, it is to be treated as continuing to have that effect if that effect is likely to recur.



# Disability: Definition



Example of disability provided in the Explanatory Notes to the 2010 Act:

- A man with depression finds even the simplest of tasks or decisions difficult, for example getting up in the morning and getting washed and dressed. He is also forgetful and can't plan ahead. Together, these amount to a 'substantial adverse effect' on his ability to carry out normal day-to-day activities. The man has experienced a number of separate periods of this depression over a period of two years, which have been diagnosed as part of an underlying mental health condition. The impairment is therefore considered to be 'long-term' and he is a disabled person for the purposes of the Bill."

Certain exclusions from the definition of disability:

Equality Act 2010 (Disability Regulations) 2010/2128

- (1) Subject to paragraph (2) below, addiction to alcohol, nicotine or any other substance is to be treated as not amounting to an impairment for the purposes of the Act.
- (2) Paragraph (1) above does not apply to addiction which was originally the result of administration of medically prescribed drugs or other medical treatment



# Disability Discrimination



- Even though additions to alcohol and drugs do not constitute disabilities, if they give rise to other mental health conditions which otherwise fit within the definition of disability then these consequential conditions could mean that the person is disabled.
- Section 15 of the 2010 Act: discrimination arising from disability
- (1) A person (A) discriminates against a disabled person (B) if—
  - (a) A treats B unfavourably because of something arising in consequence of B's disability, and
  - (b) A cannot show that the treatment is a proportionate means of achieving a legitimate aim.
- (2) Subsection (1) does not apply if A shows that A did not know, and could not reasonably have been expected to know, that B had the disability.

# Disability Discrimination



- Key concepts:
  - Unfavourable treatment: service of an NTQ/NoSP; Demotion proceedings; Possession proceedings
  - “Something arising in consequence” The actions leading to the unfavourable treatment must have arisen because of the disability. I.e. The failure to pay the rent has arisen from depression which resulted in the NoSP being served or the ASB arose from the Defendant’s psychosis which led to possession proceedings
  - “Proportionate means of achieving a legitimate aim”
    - This is where most cases are won or lost
    - In each case involving a tenant who meets the definition of disability careful record keeping of actions is key
    - Ensure that prior to service of the NoSP you have thought about whether you are serving that NoSP because of something arising in consequence of the tenant’s disability. If so, have you interviewed them to ascertain their position; made inquiries of their medical practitioners and considered whether some lesser form of action is appropriate?

# Disability Discrimination



- Aster Communities Ltd v Akerman-Livingstone [2015] 2 WLR 721

Lady Hale at Para 31:

“No landlord is allowed to evict a disabled tenant because of something arising in consequence of the disability, unless he can show eviction to be a proportionate means of achieving a legitimate aim. He is thus obliged to be more considerate towards a disabled tenant than he is towards a non-disabled one. The structured approach to proportionality asks whether there is any lesser measure which might achieve the landlord's aims. It also requires a balance to be struck between the seriousness of the impact on the tenant and the importance of the landlord's aims. People with disabilities are “entitled to have due allowance made for the consequences of their disability”: *Lewisham London Borough Council v Malcolm* [2008] AC 1399 , para 61.”

“Structured approach” derived from European Union law and stated by *R (Elias) v Secretary of State for Defence* [2006] 1 WLR 3213 Mummery LJ

“First, is the objective sufficiently important to justify limiting a fundamental right? Secondly, is the measure rationally connected to the objective? Thirdly, are the means chosen no more than is necessary to accomplish the objective?”

# Discrimination Counterclaims



- If the Court finds that a landlord has discriminated against a tenant by evicting them then Section 119 EA 2010 provides:
  - (2) The county court has power to grant any remedy which could be granted by the High Court—
    - (a) in proceedings in tort;
    - (b) on a claim for judicial review.
  - ...
  - (4) An award of damages may include compensation for injured feelings (whether or not it includes compensation on any other basis)."

Therefore, likely remedies are (1) declaration that the landlord has discriminated; and (2) damages.

Quantum of damages: the Vento scale

- The lower band applies to 'less serious cases' where the act of discrimination is a one-off or isolated occurrence.

# Discrimination Counterclaims



- The middle band applies to serious cases that do not fall within the higher band
- The higher band applies to the most serious cases, for example, where there has been a lengthy campaign of discrimination and/or harassment.
- Current scale: claims issued on or after 6 April 2020
  - a lower band of £900 to £9,000 (less serious cases)
  - a middle band of £9,000 to £27,000 (cases that do not merit an award in the upper band), and
  - an upper band of £27,000 to £45,000 (the most serious cases), with the most exceptional cases capable of exceeding £45,000

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# Public law challenges

Riccardo Calzavara

# Introduction



Predicated on the principle that public authorities must not act unlawfully.

Applies against most social landlords: *R (Weaver) v LQHT* [2009] EWCA Civ 587; [2010] 1 WLR 363.

But that doesn't mean *all* social landlords: *R (Macleod) v Peabody Trust Governors* [2016] EWHC 737 (Admin); [2016] HLR 27.



# Bases



Normally seen in allegations of:

- Acting ultra vires;
- Fettering discretion;
- Unfairness;
- Ignoring relevant, or taking into account irrelevant, considerations;
- Failure to give (adequate) reasons;
- Acting otherwise than in accordance with a legitimate expectation;
- Acting in a manner that is *Wednesbury* unreasonable.

# History (1)



Historically brought as judicial review claims, but now often brought as defences to, for example, possession claims.

- Floodgates opened by *Wandsworth LBC v Winder (No 1)* [1985] AC 461, HL: the defendant secure tenant was entitled to defend a rent arrears claim on the basis that a prior rent increase had been ultra vires.
- Widened by *Kay v Lambeth LBC* [2006] UKHL 10; [2006] 2 AC 465 at [110]: those without private law occupation rights could also raise a defence.
- Attempts to establish the contrary approach – that you needed to challenge by JR – were dismissed: *Doherty v Birmingham CC* [2008] UKHL; [2009] 1 AC 367 at [55].

# History (2)



Most recently:

- The rule applies even when the statute appears to oust it: *Manchester CC v Pinnock* [2010] UKSC 45; [2011] 2 AC 104 at [72].
- It's not just the decision to bring possession proceedings, but also underlying decisions: *Hounslow LBC v Powell* [2011] UKSC 8; [2011] 2 AC 186 at [120].

# Traps (1)



- Be careful with the wording you use in expressing your policy: *McGlynn v Welwyn Hatfield DC* [2009] EWCA Civ 285; [2010] HLR 10.
- If you have a policy about how you deal with ASB (or anything else), particularly as relates to vulnerable occupiers, comply with it: *Barber v Croydon LBC* [2010] EWCA Civ 51; [2012] HLR 26.
- If you inform a tenant of the case against her, don't seek to broaden that without notice; if you say you'll offer her a right of appeal, don't renege: *Eastlands Homes Partnership Ltd v Whyte* [2010] EWHC 695 (QB).

## Traps (2)



- Where your allocations policy permits direct offers in, for example, exceptional circumstances, consider exercising it: *Leicester CC v Shearer* [2013] EWCA Civ 1467; [2014] HLR 8.
- Comply with your duty to safeguard and promote the welfare of children: *Hertfordshire CC v Davies* [2018] EWCA Civ 379; [2018] 1 WLR 4609.

# How to “defend” a public law defence



Don't have the benefit of the permission hurdle (CPR 54.4) but that does not mean (i) that cases lacking in substance should be allowed to go to trial (CPR 55.8(2)) nor (ii) that unmeritorious claims should proceed at all (CPR 3.4(2)).

Presumption of regularity.

No interest in public law attacks of a technical or over-theoretical nature: *Brent LBC v Corcoran* [2010] EWCA Civ 774; [2011] EqLR 171 at [12].

A breach can be remedied after-the-event, particularly where the duty allegedly breached is a continuing one: *LQHT v Patrick* [2019] EWHC 1263 (QB); [2020] HLR 3.

# Standard



A public law defence will only be upheld where a JR would have succeeded: *Barnsley MBC v Norton* [2011] EWCA Civ 834; [2012] PTSR 56.

Same decision reached in: *Ahern v Southern Housing Group Ltd* [2017] EWCA Civ 1934; [2018] 2 P&CR 1.

If it doesn't make a difference on the facts, any underlying breach is (likely to be) irrelevant: *Hertfordshire CC v Davies* [2018] EWCA Civ 379; [2018] 1 WLR 4609.

There's a test of materiality, and it will be applied by considering whether the decision to evict was one which no reasonable authority would consider justifiable: *Eales v Havering LBC* [2018] EWHC 2423 (QB); [2018] HLR 46.



# *Forward v Aldwyck Housing Group Ltd*



A mere breach of the PSED (for example) is insufficient to upset the decision to bring a claim for possession; if it is highly likely that the landlord would have come to a substantially similar decision there is no need to quash it: [2019] EWCA Civ 1334; [2020] 1 WLR 584.

See Andy's section on the PSED

# Summary



1. These challenges exist (*Winder*), and will continue to be run.
2. If you're a PRP, consider whether in the circumstances you're a public body (*Macleod*).
3. Check your policies before making decisions, particularly as to whether to seek a possession order.
4. **Record** your deliberations and conclusions in writing.
5. If a defence is unmeritorious, attack it early.
6. Remember that you can fight back even if you haven't set out your assessment in writing (*Davies*, etc).
7. If you're possibly in breach, carry out an ex post facto exercise (*Patrick*).
8. In any event, if it's highly likely that you would not have come to a substantially different decision, you're probably OK (*Forward*).

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## **The Public Sector Equality Duty**

**Section 149, Equality Act 2010**

Andy Lane

# Possession proceedings & the PSED



“When a public sector landlord is contemplating taking or enforcing possession proceedings in circumstances in which a disabled person is liable to be affected by such decision, it is subject to the PSED.”

“Thus when considering what is *due* regard, the public sector landlord must weigh the factors relevant to promoting the objects of the section against any material countervailing factors. In housing cases, such countervailing factors may include, for example, the impact which the disabled person's behaviour, in so far as is material to the decision in question, is having upon others (e.g. through drug dealing or other anti-social behaviour).”

Turner J in LQHT v Patrick [2020] H.L.R. 3 at [42i,ii]

# PSED

## The Duties



- (1) A public authority must, in the exercise of its functions, have **due regard** to the need to—
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (see s. 149(3))
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it (see s. 149(5)).
- (4) The steps involved in meeting the needs of disabled person that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- (6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

# Equality of opportunity

## Section 149(1)(b)



**149(3)** Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

# PSED

## Those covered



- Public authorities: defined in s.150(1), Sch.19
- “149(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- Public function is one that is a function of a public nature for the purposes of the Human Rights Act 1998 : s.150(5); R. (Weaver) v London and Quadrant Housing Trust [2010] 1 W.L.R. 363
- R (Macleod) v Peabody Trust Governors [2016] H.L.R. 27



# R. (Bracking) v SSWP [2013] EWCA Civ 1345

The “traditional” approach at [25] (McCombe LJ)



1. Important to record the steps taken by the decision maker (DM) in seeking to meet the statutory requirements
2. What matters is what DM took into account and what they knew
3. The DM must be aware of the duty to have “due regard” to the relevant matters
4. The duty must be fulfilled before and at the time when a particular policy is being considered
5. The duty must be “exercised in substance, with rigour, and with an open mind”
6. It is a continuing duty
7. Provided the court is satisfied that there has been a rigorous consideration of the duty it is for the DM to decide how much weight should be given to the various factors informing the decision
8. The PSED involves a duty of inquiry if and as required

# Turner J – PSED, Possession & disability

## LQHT v Patrick at [42]



1. The PSED is not a duty to achieve a result but a duty to have due regard to the need to achieve the results identified in section 149.
2. Duty to make further enquiry if real possibility of disability.
3. Substance not form, with rigour and open mind (no tick box).
4. Ongoing duty but should be considered when order sought and only later if there has been a material change: cf Paragon v Neville [2018] H.L.R. 39.
5. PSED arises where L knew or ought to have known of disability.
6. Recording the steps taken in compliance will assist evidentially.
7. A conscientious decision maker focussing on the impact of disability may comply with the PSED even where they are unaware of its existence as a separate duty or of the terms of section 149.
8. The court's role is to be satisfied that the landlord has carried out a sufficiently rigorous consideration of the PSED. Weight is a question for the landlord, not the court.
9. In short, the decision maker must be clear precisely what the equality implications are when he puts them in the balance, and he must recognise the desirability of achieving them, but ultimately it is for him to decide what weight they should be given in the light of all relevant factors.

# McCombe LJ in Powell at [44]

## Context



"In my judgment, the previous decisions of the courts on the present subject of the application and working of the PSED, as on all subjects, have to be taken in their context. The impact of the PSED is universal in application to the functions of public authorities, but its application will differ from case to case, depending upon the function being exercised and the facts of the case. The cases to which we have been referred on this appeal have ranged across a wide field, from a Ministerial decision to close a national fund supporting independent living by disabled persons ( *Bracking* ) through to individual decisions in housing cases such as the present. One must be careful not to read the judgments (including the judgment in *Bracking* ) as though they were statutes. The decision of a Minister on a matter of national policy will engage very different considerations from that of a local authority official considering whether or not to take any particular step in ongoing proceedings seeking to recover possession of a unit of social housing."

# The cases



1. Hertfordshire CC v Davies [2020] EWHC 838 (QB) – permission to issue written of possession: PTA sought
2. Luton Community Housing Trust Ltd v Durdana [2020] H.L.R. 27 – ground 17 (false statement) case
3. TM v Metropolitan Housing Trust Ltd [2020] EWHC 311 (QB) 311 – challenge to decision to issue proceedings: PTA sought
4. Forward v Aldwyck Housing Group Ltd [2020] 1 W.L.R. 584 – ASB discretionary grounds
5. London & Quadrant Housing Trust v Patrick [2020] H.L.R. 3 – absolute ground of possession
6. Powell v Dacorum BC [2019] H.L.R. 21 – application to stay execution of warrant of possession: PTA sought

# Late compliance



- Barnsley MBC v Norton [2012] P.T.S.R. 56 at [34]
- Powell v Dacorum BC at [50-51]
- LQHT v Patrick at [42, 49-50]:

“51. I am satisfied that, in the instant case, although Mr Salmon completed his formal assessment after the possession order had been granted, the timing was not such as to undermine the decision to enforce possession.”

# Effect of breach



- If it is **highly likely** that the landlord's decision would not have been substantially different if the breach had not occurred, there is no need to quash the decision: Forward v Aldwyck Housing Group [2019] [2020] 1 W.L.R. 584 at [36, Longmore LJ]; L&Q HT v Patrick [2020] H.L.R. 3 at [53-56, Turner J]

“36. Thirdly I would endorse Turner J's reliance in *Patrick* [2019] EWHC 1263 (QB) on section 31(2A) of the Senior Courts Act 1981. That provides that the High Court must refuse to grant relief on an application for judicial review if it appears to the court to be highly likely that the outcome for the applicant would not have been substantially different if the conduct complained of had not occurred. It would be very odd if a non-material breach could be disregarded on a public law challenge but was fatal to a private law claim in which public law was relied on as a matter of defence. As Lloyd LJ pointed out in *Barnsley* [2012] PTSR 56 on the allowance of the defence to private law claims must carry with it the public law consequences of relying on such a defence.”



# Use at warrant stage



“The statement that the defendant's wife has suffered anxiety subsequent to the eviction and that the youngest child has severe anxiety do not in my view raise a credible argument, that even if the claimant has failed to consider relevant matters, it would have made a difference to an application for a stay.” Master Sullivan in Hertfordshire CC v Davies at [51]

“However, the decision to seek possession of a social housing unit in respect of which a court has already made a possession order is different in character from the decision under consideration in *Bracking*.” McCombe LJ in Powell v Dacorum BC at [51]

“However, the PSED consequences of enforcing an order ought already to have been adequately considered by the decision maker before the order is sought and, in most cases, in the absence of any material change in circumstances (which circumstances may include the decision maker's state of knowledge of the disability), the continuing nature of the duty will not mandate further explicit reconsideration.” Turner J in LQHT v Patrick at [42v]



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## Case Law Update

Rowan Clapp

**Paragon Asra Community Housing Association Ltd v Neville**  
**[2018] EWCA Civ 1712, [2018] H.L.R. 39**



- Discretionary grounds: Ground 12 (breach of T.A) and Ground 14 (conduct causing/likely to cause nuisance/annoyance) of HA 1988.
- T alleged discrimination under s.15 Equality Act 2010
- SPO agreed. Terms: no further breaches of T.A.
- J found possession was a 'proportionate means of achieving legitimate aim' (s.15(1)(b) EA 2010).
- Breached SPO. Paragon issued warrant for possession. T applied to suspend.
- **No need to reconsider the proportionality of enforcing the order at the warrant stage unless there is a material change of circumstances.**

Forward v Aldwyck Housing Group Ltd [2019] EWCA Civ 1334, [2020] 1 W.L.R. 584



- Discretionary grounds: Ground 12 & Ground 14 of HA 1988.
- T argued indirect discrimination & ‘cuckooing’. J found possession was a proportionate means of achieving a legitimate aim: reduction of ASB at property for benefit of neighbours/prevention of flat use for drug dealing.
- Failure to carry out PSED Assessment prior to issuing **not fatal**. Context of the decision central to PSED. **Highly likely the decision would not have been substantially different even if the landlord had conducted a timely PSED assessment.** This principle was not limited to certain narrow factual circumstances.

## London & Quadrant Housing Trust v Patrick [2020] H.L.R. 3



- Injunction under s.1 ASBCPA 2014. Added Ground 7A HA 1988 to existing possession proceedings. D amended defence alleging breach of PSED & unlawful discrimination.
- At first instance J made order for possession. Officer for the Trust **then** carried out a detailed PSED assessment.
- D appealed – argued J was obliged to set down directions.
- Found medical evidence only provided late in the day (2 days before hearing). Landlord had considered this and still concluded it was appropriate to seek possession. PSED not a ‘trump card.’
- Position would have been different if T disability had been made known at an early stage.
- In any event, **any breach had been superseded by the landlord’s later detailed assessment after the possession order.**
- Referring to Forward, it was highly likely the decision would not have been substantially different in the absence of any breach.

## Luton Community Housing Trust Ltd v Durdana [2020] EWCA Civ 445, [2020] H.L.R.27



- Ground 17 HA 1988 (false statement induced grant of tenancy). T accepted caution in relation to three offences of dishonesty – Trust sought possession.
- Common ground that Ground 17 made out – T sought to defend on basis that possession not reasonable and Trust failed to comply with PSED (Equality Act Review document – officer had no understanding of PSED or its application).
- **Court applied approach in Forward. Even if Officer had complied with PSED, decision would have been the same.** T had obtained tenancy by deception. Trust had policy of removing Ts who had so acquired accommodation. Nothing about Ms. Durdana's disabilities (or her daughter's) suggested acute impact upon them so as to counterbalance the Trust's policy.

## TM v Metropolitan Housing Trust Ltd [2020] EWHC 311 (QB)



- TM had assaulted two members of staff and exposed himself to female resident (Ground 14 HA 1988).
- Trust had commissioned Equality Act Report before seeking possession. Was in favour of seeking possession but Officer in charge sought further evidence on **capacity**.
- Proceedings were issued and then capacity assessment received. Trust did not carry out further enquiries. TM raised discrimination and PSED defences.
- In XX the Officer agreed he would have taken a different approach and considered alternatives to eviction but still considered possession proportionate.
- Court found the decision to seek possession was a proportionate means of achieving a legitimate aim. Regarding the discrimination argument, there was no alternative open to the Trust (Akerman-Livingstone). On PSED point, **Forward applied**. The Trust would in any event have sought possession absent the breach. In any event, the PSED had been corrected in the course of the Officer's XX (**note similarity with Patrick**)

## Powell v Dacorum BC [2019] EWCA Civ 23, [2019] H.L.R. 21



- SPO made regarding rent arrears and convictions for drug offences at the property (PSED not raised).
- LA sought to enforce due to more allegations of drug dealing. T applied to suspend warrant (no mention of PSED).
- Prior to hearing of application to suspend warrant. T's doctor wrote informing LA that T suffered from psychotic illness and had depressive episode -> LA performed proportionality assessment in light of the new info. Concluded possession proportionate.
- First instance – PSED did not provide grounds to suspend the warrant – Circuit judge agreed.
- **What is required by PSED depends on context. Judgments on the topic should not be read as if they were statutes.**
- Court of Appeal said would have been unfair to say LA had not complied with PSED. T had previously agreed to SPO. At time LA applied for warrant, had no reason to think it was no longer entitled to enforce SPO (note similarity with Paragon v Neville).
- Officer had made attempts to investigate. When new medical information came to light – LA considered proportionality accordingly. If had been breach, was remedied by this later assessment (note the principle from Patrick).



# Questions





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