

MONTHLY DIGEST

JANUARY 2023

Edited by Gill Steel

We trust you will find the latest LawSkills Monthly Digest helpful to your practice. The Digest is put together and edited by Gill Steel LLB, TEP, ATT, MBA



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► Wills

There is nothing to report on Wills this month.

► Probate

HMCTS update

Need to know: e.g. Authorise Probate Practitioners

HMCTS is still seeing a very high demand in the use of its services, especially telephone calls. In October 2022 HMCTS received 40,000 calls which is an increase of 56% year on year.

From 14 November the published average timeliness changed from 8 weeks to 16 weeks to process an application, to manage expectation and to better reflect the time to process the older more complex paper applications. The majority of applications are processed within 16 weeks. Publishing this new timeliness has seen a 44% drop in calls and a drop of 32% in emails.

HMCTS ran a webinar for practitioners to update them on the service on 13 December 2022 which resulted in many questions and lots of feedback which hopefully the service will now be taking on board. They

are continuing to develop forms and guidance and make improvements to their internal case management system. The changes should be in place by the end of January 2023 and improve processing times, reduce errors on grants being sent out and provide better notifications of case progress.

Review of the law on disposal of deceased's body – The Law Commission

Need to know: e.g. Authorised Probate Practitioners

The Law Commission has announced that the law governing the disposal of the bodies of the deceased is 'unfit for modern needs'. This is both in relation to the choice of method of disposal and in the carrying out of the deceased's wishes, particularly with the increase in dispute among family members.

Apparently, new methods of disposal are being developed and used in other countries which are not regulated at all in the UK.

The law as we know it dates back to the 19th Century and does not ensure that a person's own wishes will be carried out.

In this project the Law Commission are seeking to create a future-proof legal framework for disposal of the dead. They will include a review of the laws governing burials and cremation and consideration of the creation of a regulatory framework for safe and dignified new

processes. They also expect to consider the legal status of a person's wishes as well as the rules governing who else has the right to make decisions about disposal of the deceased's body.

The Law Commission is currently in a scoping phase for the work and more details will be available once this has been agreed with Government.

Does the re-sealing of an Australian grant have retrospective effect in England – *Jennison v Jennison* [2022] EWCA 1682

Need to know: e.g. Authorised Probate Practitioners

What's the issue?

Whether the re-sealing in England of a Grant of Probate issued in New South Wales, Australia had a retrospective effect or not.

What does it mean for me?

Where there is a conflict between the laws of a foreign jurisdiction, where a grant of probate is issued, and the laws of England and Wales, where the assets that are at issue are located, it is the laws of England and Wales that will prevail in relation to the administration of those assets.

What can I take away?

The case identifies a distinction between an executor and an administrator concerning the timing of bringing proceedings which

should be carefully considered if proceedings are being contemplated before the issue of a grant of representation.



The facts

Graham Jennison (“the Deceased”) died on 11 July 2007 in New South Wales, Australia where he was domiciled. A grant of probate of his Will (“the Grant”) was issued to his widow Glenda Jennison (“the Claimant”) on 15 May 2008.

On 18 February 2019 the Claimant issued proceedings against the Deceased’s brother, Richard Jennison, and his wife, Gwyneth Jennison, (“the Defendants”) in respect of alleged breaches of trust relating to land in Sheffield.

On 2 August 2019 the Defendants filed a defence on the basis, inter alia, that the Grant did not confer any jurisdiction on the Claimant in respect of any part of the Deceased’s estate in England and Wales.

On 25 November the Claimant arranged for the Grant to be re-sealed by the High Court under the Colonial Probates Act 1892 and amended her claim to refer to the re-sealed Grant.

On 23 September 2020 the Defendants amended their defence on the basis that at the time that the Claimant issued the claim she had no legal standing in England and Wales in the absence of the Grant having been re-sealed by the High Court because the re-sealing was not retrospective. This defence was rejected by the Judge in the County

Court and the case was decided in favour of the Claimant. The Defendants appealed to the High Court which also rejected the Defendants defence, firstly on the grounds that it sufficed for the proper constitution of the proceedings that the Grant had been re-sealed prior to trial and secondly that the court could waive any defect in the proceedings under CPR 3.10. The Defendants appealed to the Court of Appeal on these two points.



The law

1. **Chetty v Chetty [1916] AC 604** – An executor derives his title and authority from the Will of the testator and not from any grant of probate. An administrator, on the other hand, derives title solely under his grant and cannot institute an action as administrator before he gets a grant.
2. **Ingall v Moran [1944] 1 KB 160** – both at common law and equity the plaintiff must have a cause of action vested in him at the date of the issue of the writ.
3. **Preston v Melville (1841) 8 Cl and Ff** – the domicile regulates the right of succession but the administration must be in the country in which possession is taken and held under lawful authority of the property of the deceased.
4. **Re Lorillard [1922] 2 Ch 638** – the principle is that the administration of the estate of a deceased person is governed

entirely by the lex loci and it is only when the administration is over that the law of his domicile comes in.

5. **Burns v Campbell [1952] 1 KB 15** – When the writ was issued the widow had not a grant of administration to the English assets. So as far as the English courts were concerned, she was not an administratrix. The action was not, therefore, properly constituted and was a nullity.



The decision

1. Both at common law and in equity in order to maintain an action the plaintiff must have a cause of action vested in him at the date of the issue of the writ.
2. An executor having title from death need not wait for probate before issuing a claim but will have to obtain probate by the time the case comes to trial.
3. The need for a foreign representative to obtain a grant of probate or letters of administration in this jurisdiction was mitigated by the introduction of re-sealing as an alternative. Where a court of probate in a British possession has granted probate in respect of the estate of a deceased person, then the probate so granted may, on being produced to a court of probate in the United Kingdom, be sealed with the seal of that court and thereupon be of like force and effect and have the same operation in the United Kingdom as if granted by that court.

4. The re-sealing of the grant does not have retrospective effect. Read naturally the word “thereupon” signifies “upon that being done” and does not imply retrospectivity. See also *Burns v Campbell*.
5. There is a discrepancy between the law of New South Wales and England and Wales. Under the former on the death of person their assets vest in the NSW Trustee until a grant of probate is issued, at which point the assets vest in the executor. Under the latter, the assets vest in the executor on the death of the deceased and before a grant of probate is obtained. In those circumstances, it is necessary to decide which law applies. Notwithstanding that the Claimant obtained a grant of probate in New South Wales, it is from the jurisdiction of England and Wales that she derives her authority to collect assets in England and Wales. The law of England and Wales provides that the Claimant acquired title to the Deceased’s estate on his death. As a result, the Claimant had standing to issue the claim when she did.
6. If that was wrong, did the Court have power under CPR 3.10 to allow the proceedings to continue? CPR 3.10 is not applicable where the proceedings that have been brought are to be regarded as a nullity. CPR 3.10 allows existing proceedings to be regularised, not the creation of valid proceedings. The bringing of proceedings by a person who at the time lacks standing to represent it is not a mere “error of procedure” but renders the proceedings a nullity. If the Claimant in this case had no standing

the proceedings would have been struck out as a nullity and CPR 3.10 would have had no relevance.

7. The appeal was dismissed.



Practice points

1. This case was decided on the basis that re-sealing of a foreign grant is not retrospective. In practice, however, the issue was not decisive as the Court found that the standing of the executor to bring the proceedings derived from her authority commencing on the date of death of the deceased. As a result, the date of the re-sealing of the grant was not critical.
2. The case confirms that the grant of probate does not have to be obtained before the issue of proceedings as long as it is available at the date of trial.
3. An important distinction is made between the position of an executor and an administrator.
4. Note that where the proceedings relate to the administration of the estate in England and Wales, it is the law of this jurisdiction that is relevant, not the law of the foreign jurisdiction where the grant of probate may have been issued.

▶ Trusts

HM Treasury review of AML

Need to know: e.g. Lawyers, Tax Advisers, Accountants

HM Treasury are expecting to consult on further changes to the Money Laundering Regulations (MLRs) in due course. HMRC will be looking to include some proposals on the Trust Registration Service elements of the MLRs within that consultation, focusing on scope and exclusions. HMRC will be confirming this position more widely within an article in the next Trusts & Estates newsletter in February.

Spring Budget

Need to know: e.g. Lawyers, Tax Advisers, Accountants

The Government has announced that the Budget will be held on 15 March 2023.

HMRC investigations into IHT

Need to know: e.g. Authorised Probate Practitioners, Tax Advisers, Accountants

A Freedom of Information Act 2000 request has revealed that HMRC increased the sum collected through IHT investigations by 28% in the tax year 2021/22, recovering £326 million compared to £254 million in 2020/21.

What might be causing this? Many more people are submitting or failing to submit IHT400 without the advice of an adviser, which obviously has the potential for more errors. Also, asset values have generally increased. HMRC have been given more resources to target individuals with an income above £200,000 or assets over £2 million so the more complex estates are likely to be investigated if all is not as HMRC expect.

HMRC review of standard for agents

Need to know: e.g. Lawyers, Tax Advisers, Accountants

HMRC has been reviewing its standard for agents for some time with a view to reducing the risk of rogue agents not behaving as they should. In particular, those agents who only deal with repayment claims and recovering the funds without passing them on to the client.

As a result, HMRC's standard for agents has been revised and can be found here: <https://www.gov.uk/government/publications/hmrc-the-standard-for-agents/the-hmrc-standard-for-agents>

Whilst practitioners will be held to account under the Professional Conduct in Relation to Taxation rules it is still recommended that you read this standard and appreciate that when acting as agents for a client in handling a tax matter such as completing a personal tax return as an attorney, or an IHT 400 in an estate, etc. there is a standard with which we must comply. To be honest, the terms of the standard are what you might expect.

However, there is one aspect you might be surprised about, which is amongst the options for HMRC action if the standard is not followed. HMRC may refer an agent to their relevant professional body, presumably for investigation and possible sanction of some kind.

Making Tax Digital (MTD) postponed

Need to know: e.g. Lawyers, Tax Advisers, Accountants

HMRC announced in late December that the UK Government will be postponing MTD for Income Tax Self-Assessment (ITSA) until April 2026 from April 2024.

The reasons given are that businesses and self-employed individuals are currently facing a challenging economic environment and that the transition to MTD for ITSA for the self-employed and small landlords represents a significant change for taxpayers as well as practitioners and HMRC.

There is no doubt that much investment has been made by IT companies in getting things prepared to move to the new system so those businesses will not be happy about the delay but it is likely that everyone else will be pleased as certainly clients are not geared up for the expense of having to report to HMRC quarterly rather than annually as now.

Interest on tax paid late increases again

Need to know: e.g. Lawyers, Tax Advisers, Accountants

Following the Bank of England decision to increase base rate to 3.5%, HMRC late payment interest rate increases to 6% and the repayment interest rate goes up to 2.5% with effect from 6 January 2023.

IHT threshold and RNRB threshold

Need to know: e.g. Wills & Probate practitioners, Tax Advisers, Accountants

As announced in the Autumn Statement, HMRC updated its rates and allowances tables on 6 January 2023 to reflect the fact that the IHT threshold and the enhanced threshold for residence nil rate band are to remain the same until 5 April 2028.

Agri-environment schemes

Need to know: e.g. Agri lawyers, Tax Advisers, Accountants

As many of you will know, since the UK left the EU the Government has been shifting the focus of on what basis farmers will be subsidised. For many years the subsidies were designed to increase food production and now the emphasis is being placed on their role in maintaining the natural environment and even improving it.

Whilst full details of what DEFRA expect from farmers in order for them to benefit from ELMS (Environmental Land Management Scheme) are awaited, HMRC has updated its IHT manual to reflect the fact that some qualifying agricultural land may be taken out of food production and may no longer qualify as agricultural property for the purposes of Agricultural Property Relief (APR).

Do read the recently updated IHTM 25252 which explains that if a farmer does take qualifying land out of food production and into an agri-environmental scheme this will have the impact of losing APR on that land. However, if the farming business still qualifies overall as a trading business, even with the ELMS grant, then Business Property Relief might be relevant.

IFS Report on Death and taxes and pensions

Need to know: e.g. Estate planners, Tax Advisers, Accountants

What are your views on whether pension pots should be subject to IHT on death or not? The Institute of Fiscal Studies (IFS) in a new report 'Death and Taxes and Pensions' believes that pensions should not be treated more favourably by the tax system as a means of making gifts on death than they are as a means of generating retirement income.

Under current rules a defined contribution pension pot is not included in the value of the estate on death and so avoids IHT. This may encourage those with a range of investments to live off the other investments (rather than draw down their pension), which would be potentially taxable and preserve the pension pot for making gifts to their family on death. The IFS say that if the government did not want to increase the overall yield of IHT by this method they could use the revenue received to cut the IHT rate or increase the threshold at which it becomes payable.

The IFS also argues that basic rate income tax could be levied on all funds that remain in pensions at death since at the moment current income tax rules do not require income tax to be applicable on the withdrawal of the fund by the person inheriting the fund when the pension creator dies under the age of 75.

It is a thought provoking report and can be read here:
<https://ifs.org.uk/sites/default/files/2022-12/Death-and-taxes-and-pensions-Institute-for-Fiscal-Studies.pdf>

► Elderly Client

Changes to Property & Affairs Deputyship applications

Need to know: e.g. Court of Protection Lawyers, Deputies

From 1 January 2023 the new upfront notification process will become the standard process for all Property and Affairs deputyship applications, following a successful pilot. A new Practice Direction and new Court of Protection forms will be available on .GOV.UK

HMCTS says that the benefits of the new process include:

- Less paperwork to complete and faster processing times
- Increased initial engagement reducing delays caused by objections
- Forms CoP20a and COP20b no longer need to be completed
- A new easy to use online service that supports better accuracy of applications

The new process and new forms: COP14PADep and COP15PADep, must be used from 1 January 2023 for all applications received by the Court. The online service will come in first for practitioners on 2 January 2023. Personal applicants will be able to pay and apply online from February 2023.

From 1 February 2023, applications that do not follow the new upfront notification process will be returned to the applicant.

The new forms should be returned to the applicant or their agent within 14 days of notification where possible, The applicant should then send/upload all acknowledgement forms whilst making the application to the court. After 14 days from notification, the court will assume agreement to the order being made if no acknowledgement form is returned to the applicant and no COP5 is filed by those notified.

Requirement to prove death at OPG simplified

Need to know: e.g. Court of Protection Lawyers, Attorneys and Deputies

The OPG has simplified the process by which people in England & Wales can notify it that the donor of a power of attorney has died, or that an attorney acting under a registered LPA, deputy, guardian or missing person has died. An updated practice note is to be issued in January 2023, clarifying the previous requirement for proof of death for every death notification has been dropped and, in most cases, will not be required.

Court declines to protect means tested benefits – Fv R [2022] EWCOP 49

Need to know: e.g. Wills & Probate Lawyers, Trust Advisers

What's the issue?

Whether the court would approve the transfer of assets into a trust when the only obvious reason for doing so was to preserve an entitlement to means tested benefits.

What does it mean for me?

Absolute bequests under a Will to a person in receipt of means tested benefits can have a serious impact on the entitlement to benefits and should be carefully discussed with a client at the time those instructions are taken, and the discussion carefully recorded.

What can I take away?

There is no guarantee that a Court will agree to a scheme to put assets into a trust if they consider that the proposal would result in less security for the funds and less supervision by the Court.



The facts

R is a man in his 30's with very severe disabilities who lacked all relevant capacity. He is in receipt of a number of different state benefits totalling £60,293.48 a year of which £52,381.60 are means tested. The court described these benefits as “a safety net” not “a universal entitlement.”

R's mother's cousin T died three years ago leaving in his Will a third of his residuary estate to R absolutely. The bequest was expected to be between £400,000 and £600,000. R's father, his property and affairs deputy (jointly with R's mother) applied to the Court for an order for authority to execute a deed of settlement so that the inheritance left to R was placed into a disabled person's trust for the benefit of R.

R's father argued that putting the funds into a trust would give better effect to T's intentions. Should R receive the bequest direct, it would

jeopardise his benefits and not implement the desired intention of T to leave provision to ensure R's life style could be enhanced. The Official Solicitor, instructed to act for R, argued that, if the Court authorised the proposed trust, the relevant authorities would take the view that the preservation of R's benefits was a significant operative purpose behind the creation of the trust. In addition, the proposal could lead to the consequence that R, through the Court, would not be able to control or protect the assets and there were potential adverse tax consequences.



The law

1. **WR v Secretary of State for Work and Pensions [2012] UKUT 127 (AAC)** – where the claimant transferred money to someone else for the purpose of securing entitlement to income support, the money was taken into account for income support purposes as notional capital.
2. **The Care and Support (Charging and Assessment of Resources) Regulations 2014 Rule 22(1)** – the adult is to be treated as possessing capital of which the adult has deprived themselves for the purpose of decreasing the amount that they may be liable to pay towards the cost of meeting their needs for care and support and their needs for support.
3. **Social Security Commissioners Decision R(H) 1/06** – securing the entitlement to benefits need not be the sole operating purpose

for the purposes of the regulations – it needs only to be a significant operative purpose.

4. **SM v HM [2012] COPLR 187 and Watt v ABC [2016] EWHC 2532** – deputyship is subject to supervision of the OPG and a security bond whereas trustees operate outside that supervision and subject only to the more limited powers of the High Court.
5. **The Secretary of State for Justice v A local authority [2021] EWCA Civ 1527** – the Court of Protection is part of a wider system of the administration of justice. The Court cannot endorse a proposal whose purpose is to preserve an eligibility for benefits which Parliament has decided does not exist.



The decision

1. The decision of the Court must be taken in accordance of the requirements of sections 1 and 4 of the Mental Capacity Act 2005.
2. It was not clear that the purpose of the application was to give better effect to T's intentions. T was informed of the possibility of a trust but chose to give the gift to R absolutely.
3. The only obstacle to giving the sum to R absolutely were the rules about the entitlement to means tested benefits.
4. The structure of the proposal has disadvantages to R compared to a deputyship by taking the capital outside the oversight of the

OPG, there would be no security bond and adverse tax consequences. The proposed trust has no or insufficient mechanism to ensure that sums would actually be applied for R.

5. There was no guarantee that the proposal would work, and the Court could not bind the DWP or local authority in respect to the benefits implications of the proposal. Even if the proposal was agreed by the Court, the relevant authorities might nevertheless take the view that the preservation of means tested benefits was a significant operative purpose. Such possibility that the proposal might be effective is not sufficient to outweigh the other disadvantages of the proposal compared to absolute entitlement and management under the general usual rules of deputyship.



Practice points

1. R's father claimed that he had suggested to T that the funds should be put into a trust for R. The Court went through the file of the solicitor who prepared T's Will and there appears to have been no indication that T wanted to put the funds into a trust and, in particular, no evidence of discussion about the likely impact on R's benefits of an absolute gift. In view of the sums involved it might have been expected that the issue of benefits would have formed part of the discussion between T and his adviser in any event.
2. Throughout the Judge emphasised the relevance of ensuring that the decision was taken in R's best interests and noted the

disadvantages of the proposal put forward by R's father. As the Judge quite clearly was not convinced that the proposal would be effective in preserving the benefits, the other factors such as management of the funds and control by the Court took precedence.

Best interest decision on residence – Reading Borough Council v P & Others [2022] EWCOP 27

Need to know: e.g. Court of Protection Lawyers

What's the issue?

Whether it was in the best interests of a patient who was unable to make a decision for herself to remain resident in a care home or to move for a trial period to live with one of her children.

What does it mean for me?

In making its decisions a Court can only take into consideration “the available options”.

What can I take away?

The decision of the Court was made more difficult because of the lack of evidence of the wishes and feelings of the patient and the acrimonious dispute between her children about what was in the best interests of their mother.



The facts

P was an 86-year-old woman. She was originally from Iran but moved to the UK in 2002 to live with her family. She has two sons SS and HS and a daughter KS. She suffers from Alzheimer's dementia and other physical conditions including incontinence. Her native language is Farsi and, although she originally spoke English, she is able to do so no longer because of the dementia.

In August 2020 she was admitted to hospital for hip operations. In February 2021 she was discharged from hospital to a care home by agreement between the Council and the family. However on 1 July 2021 the care home served notice requiring the removal of P from the home as a result of disagreements between KS and the home. In September 2021 P moved to an alternative care home and a standard authorisation of deprivation of liberty was made for a period of 12 months.

The issue for determination before the court was whether P's current residence and care arrangements were in P's best interests or whether she should move to live with either KS or SS on a trial basis with a package of care and support. The Council, the Official Solicitor representing P, HS and SS all agreed that it was in P's best interests to remain where she was in the care home. KS wanted P to come and live with her on a trial basis. SS argued that if a placement with a member of the family was considered it would be better for P to live with him rather than KS.

The Judge commented that sadly for all concerned and particularly P there was an acrimonious and fraught relationship between HS, SS and KS and a difficult relationship between KS and those who had the responsibility of providing care to P. A previous attempt to provide P with a package of professional support at KS's flat broke down within a week.

A table comparing the three available options was prepared. There was little to distinguish between the options save on the question of access where the steps leading to KS's flat would mean that P could not leave the flat except in an emergency and would have no access to outside space or to the wider community. Culturally P would have more Farsi spoken to her if she lived with SS or KS but the care home did try to meet P's cultural needs by staff having a range of Farsi phrases to use when interactive with her, they encouraged the family to provide Persian food and played her Persian music. SS house had room for a live in carer and there was access to a garden.

The social work evidence was clear that any move by P at this point would be disruptive for her. Any move should be regarded as permanent. This would be a disadvantage of any trial move as the move to the current care home had been disruptive to P. In addition, the care home had indicated that it could only keep P's room available for four weeks which could present a problem if the trial move to KS or SS broke down after that period.



The law

1. **Mental Capacity Act 2005** – Section 1(5) a decision made under this act on behalf of a person who lacks capacity must be made in his best interests. Section 4(6) the court must consider as far as reasonably ascertainable (a) the person's past and present wishes and feelings (b) the beliefs and values that would be likely to influence his decision if he had capacity (c) the other factors that he would be likely to consider if he were able to do so.
2. **Wye Valley NHS Trust v B [2015] EWCOP 60** – a finding of lack of capacity does not operate as an off switch for P's rights and freedoms. P's wishes and feelings may not necessarily determine the outcome of the case but are a factor of significant importance.
3. **Aintree University Hospitals NHS Foundation Trust v James [2013] UKSC 67** – the purpose of the 'best interests' test is to consider matters from the patients point of view. In so far as it is possible to ascertain the patient's wishes and feelings, his beliefs and values or the things that are important to him, it is those which should be taken into account because they are a component in making the choice which is right for him as an individual human being.
4. **N v A CCG [2017] UKSC 22** – the Court of Protection is limited to decisions that a person is unable to take for themselves. The court must choose between *available* options.



The decision

1. There was very little evidence of previously expressed wishes and feelings of P on the matter of her residence and ascertaining her current wishes and feelings was not possible based on the available evidence.
2. A key potential positive of P living with KS or SS was that she would be living with her family who are clearly very important to P. P would also be in a culturally appropriate setting if living with either KS or SS reflecting her heritage.
3. There was a deep and long-lasting rift between P's children and she needed to be protected from the consequences of that acrimony. It is this fraught relationship that is more likely to impact on the amount of contact that P would have with her family if P were to live with either KS or SS.
4. The general family conflict would discourage others to visit P. In that case the care home would represent "neutral ground" for visits.
5. The main risk of a placement of P with KS was the breakdown of the care package in the context of a stretched market of the availability of paid care. In addition a move by P to live with

either KS or SS would mean that she could only have a bed wash as opposed to a full body wash in either a bath or shower.

6. Based on the professional evidence, P would derive pleasure and benefit from being able to access outside space wherever she is living. Access to open space would not be available if P went to live with KS.
7. The Council had adopted a cost neutral stance in assessing the various available options.
8. A statement of expectations had been agreed between the family and the care home designed to reduce the potential burden on staff at the care home of the consequences of the lack of trust between various family members.
9. Any move by P at this stage would be disruptive to her. It would not be in P's best interests to have two potentially trial moves, one to KS and one to SS.
10. The least restrictive option for P was for her to remain in her existing care home where she was deprived of her liberty because this enabled her to continue to have frequent contact with her family which she enjoyed and which improved her quality of life.

11. It was in P's best interests to remain living in the existing care home and to receive the package of care and support being provided there.



Practice points

1. The impact on P of the dispute between her children and between KS and care home staff was relevant to deciding on P's best interest.
2. Although the Aintree case emphasises the importance of taking account of the patient's wishes where these can be ascertained, Lady Hale commented that did not mean that the patient's wishes must prevail.
3. The Court took into account the particular difficulty in the market of finding appropriate social care in deciding whether a move to live with one of the children was likely to be a satisfactory outcome, particularly in view of the tensions that had existed in the past between KS and social or care workers.
4. The importance of taking account of cultural issues in deciding best interests was noted.

MONTHLY DIGEST RENEWALS

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WEDNESDAY WEBINARS 2023

On the first Wednesday of each month, Gill will be presenting a live “Wednesday Webinar”. These can be booked individually, or by purchasing an Annual Pass which saves you £50. Both options give you personal access to the live webinar and the recording. For further information and the full list of Wednesday Webinars go to: <https://shop.lawskills.co.uk/product-category/webinars/?orderby=date>

TECHNICAL LEARNING PACKS

Technical Learning Packs are designed to provide a person new to the topic with notes on the law, procedure, tools and resources and an opportunity to test understanding with some multiple-choice questions. There are a number of different packs available including ‘How to draft a standard family Will’ and Monthly Digest subscribers get a discount – go to

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