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# Judicial Review Procedure Update

## 22 May 2020

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# Administrative Court Hearings during the COVID 19 Pandemic

*Hereward Phillpot QC*

## Introduction

- Rapid shift to remote hearings in a very short time
- New legislation, guidance, protocols and rules in March and April (some already updated)
- Hard work and patience of Courts, staff and lawyers have enabled the new system to function effectively
- Some innovations may outlast the pandemic, but remote hearings are far from ideal

## Should the hearing be adjourned?

- Civil Justice in England and Wales – Protocol regarding remote hearings
  - Procedure for Ct. to decide whether: i) remote hearing, ii) open Ct. (with precautions) or iii) adjournment
- PD 51ZA
  - *In so far as compatible with the proper administration of justice the Court will take into account the impact of the COVID-19 pandemic when considering applications for … the adjournment of hearings*
- Possible reasons to adjourn:
  - Litigant in person
  - Illness/caring responsibilities of key participants
  - Volume of material and complexity of issues

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- ***Blackfriars Ltd.*** [2020] EWHC 845 (Ch): Application for adjournment of 5 week trial on the basis of risk to health and technological challenge rejected:
  - *"Legislature is sending a very clear message that it expects the courts to continue to function"* [23]
  - *"The message is that as many hearings as possible should continue and they should do so remotely as long as that can be done safely"* [32]

- Admin. Court cases likely to be easier to deal with remotely:
  - Normally no live witness evidence, focussed issues of law, fewer participants

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## Nine Key Practical Points

- (1) Technology
  - Method always a matter for the judge, but so far default has been Skype for Business
  - Some problems experienced in using Skype for Business on Macs (Microsoft Teams commonly used instead)
  - Check and agree platform well in advance
  - Ensure all participants are able to use the platform

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- (2) Cameras and microphones
  - Cameras
    - Neutral background, with no distractions
    - Lighting (well lit, not back-lit)
    - Camera on a raised platform
    - Will be on throughout, so beware
  - Microphones
    - Mute when not speaking
    - Mute when seeking instructions

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- (3) Broadband bandwidth
  - The Remote Access Family Court: 1.5 Mbps e.w.
  - Skype for Business not very forgiving
  - May necessitate re-locating to Chambers, solicitors' office or another location with better connection (see ***Blackfriars Ltd***. at [51])

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- (4) Communications with the Court
  - Ensure the Judge's clerk has all parties' contact details
  - Ensure you have the clerk's contact details
  - Agree a protocol for what happens in the event of disconnection

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- (5) Communications within the team
  - Agree how instructions are to be sought/taken during the hearing (email, WhatsApp etc.)
  - Limit distractions – filtering notes
  - Check if any electronic messages before concluding
  - Ask for time to take instructions if needed

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- (6) Bundles
  - ACO unmanned - hard copies may not get through
  - Limit the Ebundles to what is essential to refer to during submissions (extracts where possible)
  - Core Bundles (documents and law) will be easier to handle and will save time
  - Follow the guidance on preparation, indexing and pagination of Ebundles
  - Note: new HMCTS Document Upload Centre

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- (7) Co-operation in advance
  - Effective conduct of virtual hearings requires pro-active co-operation between the advocates in advance
    - Agree what is and is not in issue
    - Agree a timetable for submissions
    - Agree Bundles and a Core Bundle
    - Agree a focused list of pre-reading

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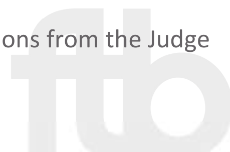
- (8) Trial runs
  - Judge's clerks have arranged trial runs in some cases
  - Successful in limiting delays
  - Should involve all parties if possible – preferably at the same time of day as the hearing

- (9) Advocacy
  - Sitting not standing
  - Suits not robed
  - Sk.A as the basis for oral submissions
  - Pace and style:
    - Slow down
    - Substance over style
    - Structured and succinct – do not waste time
    - Less interaction/intervention – check for questions from the Judge before moving on



# Useful sources of guidance

- Civil Justice in England and Wales – Protocol Regarding Remote Hearings
- Admin. Ct. guidance – COVID 19 Measures (updated 19.5.20)
- Holgate J email, 8 April 2020
- How to join telephone and video hearings during coronavirus (COVID-19 outbreak)
- Inns of Court College of Advocacy "Principles for Remote Advocacy"
- The Remote Access Family Court
- ALBA – Guidance to advocates on remote hearings, May 2020
- COMBAR – Guidance note on remote hearings, May 2020
- Judicial Review in the Administrative Court during the COVID-19 Pandemic (Tomlinson, Hynes, Marshall and Maxwell)
- Ebundles – The Bar Council

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# ftb Public Law Seminar

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## Issues on concession or discontinuance of a claim for Judicial review

## Mark Westmoreland Smith

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## The starting point: the overriding objective

- CPR r.1.1:
  - *"(1) These Rules are a new procedural code with the overriding objective of enabling the court to deal with cases justly and at proportionate cost.*
  - *(2) Dealing with a case justly and at proportionate cost includes, so far as is practicable…*
    - *(d) ensuring that it is dealt with expeditiously and fairly;*
    - *(e) allotting to it an appropriate share of the court's resources, while taking into account the need to allot resources to other cases; and*
    - *(f) enforcing compliance with rules, practice directions and orders"*
- CPR r.1.3: The parties are required to help the court to further the overriding objective.

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## The overriding objective and the court's resources

- Paragraph 1.3.3 of White Book states: "*CPR 1.1(2)(e) has assumed increasing importance. The duties imposed on parties and their professional advisers to keep the court informed of developments that may affect the use by the court of its resources are of particular importance, as they articulate a central aspect of the new rules commitment to proportionality.*"

- This is particularly true in the Admin Court. As the preface to the Admin Court Guide puts it: "*It provides general guidance as to how litigation in the Administrative Court should be conducted in order to achieve the overriding objective of dealing with cases justly and at proportionate cost.…In recent years, the Administrative Court has become one of the busiest specialist Courts within the High Court. It is imperative that Court resources (including the time of the judges who sit in the Administrative Court) are used efficiently. That has not uniformly been the case in the past where the Court has experienced problems in relation to applications claiming unnecessary urgency, over-long written arguments, and bundles of documents, authorities and skeleton arguments being filed very late (to name just a few problems). These and other bad practices will not be tolerated. This Guide therefore sets out in clear terms what is expected. Sanctions may be applied if parties fail to comply.*" (my emphasis)

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## The Admin Court in practice

- Admin Court lawyers prepare papers for the judges one to two weeks before the relevant judge's reading day.

- A typical week for a judge in the Admin Court is:
  - Monday – reading day;
  - Tuesday – Thursday – sitting; and
  - Friday – reserved for judgments.

- If a case settles within two weeks of the hearing date, the court is likely to have committed resources to the case.

- Ability to re-list is limited. A late vacation of a hearing date is likely to waste court time.

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# Approach to settlement

- The Court generally encourages settlement.
- Admin Court Guide, § 12.2.1: "*The parties must make efforts to settle the claim without requiring the intervention of the Court. This is a continuing duty and whilst it is preferable to settle the claim before it is started, the parties must continue to evaluate the strength of their case throughout proceedings, especially after any indication as to the strength of the case from the Court (such as after the refusal or grant of permission to apply for judicial review). The parties should consider using alternative dispute resolution… to explore settlement of the case, or at least to narrow the issues in the case.*"
- 3 rules:
  - (1) Keep merits under continual review;
  - (2) Act promptly; and
  - (3) Keep the court informed.

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# Importance of complying with court orders

- Admin Court Guide, § 12.2.3:
  - *"The parties must comply with the procedural provisions in the CPR, the relevant Practice Directions and orders of the Court (including orders by an ACO lawyer). If a party knows they will not be able to do so they should inform the ACO and the other parties as soon as possible and make the application to extend the time limit as soon as possible (in accordance with the interim applications procedure in paragraph 12.7 of this Guide)."*
- Note CPR r.2.11 and the ability for parties to extend time: "*Unless these Rules or a practice direction provide otherwise or the court orders otherwise, the time specified by a rule or by the court for a person to do any act may be varied by the written agreement of the parties.*"
- This ability is not unfettered: CPR r.1.3.
- The same applies to discontinuance under Part 38.

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## Sanctions

- Failure to comply with Court Orders:
  - *R (the National Council for Civil Liberties (Liberty)) v Secretary for the State Home Department* [2018] EWHC 976 (Admin)
    - D's application for extension of time to file skeleton argument after date for filing.
    - Allowed but costs of application to be paid by D on an indemnity basis and in order to give effect to the sanction, those cost outside of the scope of a cost capping order that had been made in the case.

- Late settlement, discontinuance or use of CPR r.2.11:
  - *R (U) v Newham LBC* [2012] EWHC 610 (Admin)
    - Wyn Williams J. ordered defendant to pay claimant's post-permission costs on an indemnity basis in circumstances where the defendant conceded two days before the substantive hearing.
  - Court can hold hearing into conduct of the parties with cost consequences.

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## Key points to remember

1) CPR.1.3: the parties are charged with furthering the Overriding Objective.
2) The Courts resources are directly relevant to the Overriding Objective. Late decisions on settlement effect the Court's ability to properly deploy its resources.
3) Keep the merits of your cases under continual review and in particular at key stages such as permission/ detailed grounds.
4) Act promptly where it is decided to discontinue or concede. Make such decisions within a timeframe that enables the Court to redeploy its resources.
5) Even where it appears that the case will settle, orders such as the filing of a trial bundle cannot be ignored. Parties must agree to or apply for an extension of time.
6) Always inform the Court of any time extensions or decision to settle. Do so as soon as practicable.
7) The Conduct of the parties will be relevant to costs on settlement.
8) Failure to properly conduct the settlement process could lead to a hearing at which the offending party will be at risk of costs.

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# Candour and Disclosure in Judicial Review

Charles Streeten

22 May 2020

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## Key Points

- Compliance with the duty of candour is central to all public law litigation
- The duty of candour is separate and distinct from disclosure under CPR Part 31
- The court's increasing willingness to grant applications for disclosure highlights the importance of thorough compliance with the duty of candour

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## The Duty of Candour: *Locus Classicus*

"*The evolution of what is, in effect, a specialist administrative or public law court is a post-war development. This development has created a new relationship between the courts and those who derive their authority from the public law, one of partnership based on a common aim, namely the maintenance of the highest standards of public administration… It is for the respondent to resist [the] application if he considers it to be unjustified but this is a process which falls to be conducted with all the cards face upwards on the table and the vast majority of the cards will start in the authority's hands.*"

Sir John Donaldson MR in R v Lancashire County Council, ex p Huddleston [1986] 2 All ER 941

## Duty of Candour: Underlying Objectives

- Uphold the rule of law through a common partnership between the courts and public authorities
- Ensure Claimant's have a fair hearing in circumstances where most of the cards start in the hands of the decision maker
- Procedurally to streamline claims for judicial review and so to make them cost efficient
- To secure public confidence in administrative decision making and the justice system

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## Duty of Candour: What is Required?

- Assist the court with full and accurate explanation of all the facts, identifying "the good the bad and the ugly" (*Hoareau v Foreign Secretary* [2018] EWHC 1508 (Admin) per Singh LJ at para. 20)
- Extends to the disclosure of relevant materials and documentation (*R (Bancoult) v Foreign Secretary (No 4)* [2017] AC 300 per Lord Kerr at para. 184)
- Must not mislead by omission or failure to disclose (*R (Kahn) v SSHD* [2016] EWHC Civ 416 per Ryder LJ at para. 71)
- Applies even to grounds which have not been pleaded (*Bancoult (No 4)* per Lord Kerr at para. 183
- Applies prior to the grant of permission, and even if the authority is not participating (*R (Mid-Counties Cooperative) v Forest of Dean* [2015] EWHC 1251 (Admin)

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## Duty of Candour: How to Comply

- A particular obligation falls upon solicitors and to assist the court in ensuring that the high duty imposed by the duty of candour on public authorities is fulfilled (*Hoareau* at para. 18)
- The duty of candour may tend in a different direction from disclosure… Simple disclosure of documents might suggest that all that the public authority has to do is give a lot of documents to the claimant's representatives but this may, in truth, overwhelm them and obfuscate what the true issues are (*Hoareau* at para. 19 and *Khan* at para. 23)
- The duty requires a proportionate search, from which should be distilled an explanation of all relevant facts, presented in the form of an affidavit or sworn pleading exhibiting all significant documents (*Hoareau* para. 24)
- N.B an internal record should be kept of key decisions in relation to how the duty of candour has been complied with

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# Disclosure: General Principles

- Disclosure is not required in claims for judicial review unless the court orders otherwise (CPR PD54A 12.1). Even where a document is referred to in a witness statement or statement of case disclosure of the document is not automatically required (CPR 31.2 does not automatically apply see *R (Jet2.com Ltd) v CAA* [2018] EWHC 1508 (Admin))
- Parties to a judicial review may however apply to the court for disclosure under CPR Part 31. The courts now take a "flexible and less prescriptive" approach to disclosure applications in judicial review, deciding the need for disclosure by balancing the relevant factors with reference to the facts of each individual case (see *Tweed v Parades Commission* [2006] UKHL 53 at paras. 32 and 38 per Lord Carswell and para. 56 per Lord Brown of Eaton-under-Heywood).
- The court should seek, in particular, to give effect to the overriding objective of determining cases justly and at proportionate expense, and should order disclosure where the court *may otherwise* be unable to resolve the issues fairly and justly *to all parties* (*Tweed* at para.33 per Lord Carswell and *Jet2.com* at para. 48)

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# A cautionary tale…

**The Forum, Kensingtc**

- 30 stories
- 486 residential units
- 749 bed hotel

## RBKC Application

RBKC made an application for an order:

(1) Requiring the Mayor to comply with the duty of candour

(2) Requiring the attendance of Nick Ray and Juliemma McLoughlin for cross-examination

(3) For specific disclosure

Mayor resisted arguing that what was challenged was the grant of planning permission and that therefore documents produced in the context of producing the UU were not relevant.

Lang J granted the application. Specifically criticizing the approach of the Mayor to "relevance" when deciding whether to disclose documents.

## Concluding Observations

- The duty of candour underpins the public law jurisdiction. Without it there could be no effective judicial review.
- More aggressive "commercial" approaches to public law litigation appear in some instances to have led to failings in this regard.
- Lawyers acting for government play a particularly important role in the justice system which requires objectivity.

*"Central government agencies in particular… must present their cases dispassionately and in the public interest"* (Hoareau para. 22)

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**David Matthias Q.C.**

# Security for Costs in Judicial Review

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Whilst the applicant's power to apply for a cost capping order in judicial review proceedings pursuant to the provisions in sections 88 and 89 of the Criminal Justice and Courts Act 2015 is well known and often exercised, the respondent's power to apply for security for its costs in judicial review proceedings pursuant to the provisions of CPR 25.12 and 25.13 is often overlooked by respondents and rarely exercised.

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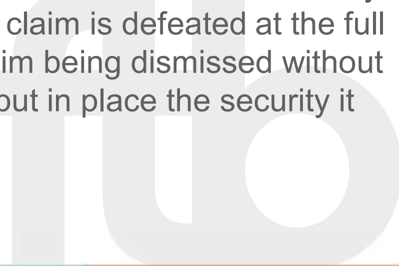
This is curious because in an appropriate case and where successful, an application for security for costs can at least result in the respondent's position in terms of the recoverability of its costs being safeguarded if the claim is defeated at the full hearing, and at best result in the claim being dismissed without a full hearing if the claimant fails to put in place the security it has been ordered to provide.



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In an appropriate case, an application for security for costs brought by a respondent against a claimant in judicial review proceedings can accordingly be a powerful tactical weapon which can sometimes have the effect of killing off a claim and avoiding the need for a full hearing.

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The canny respondent should be alive to the potential value of bringing an application for security in an appropriate case.

Likewise, the canny claimant should be alive to the risk of such an application being made and be prepared to guard against it.

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## Security for costs, pursuant to CPR 25.12 and 25.13

### CPR 25.12 – Security for Costs

(1) A defendant to any claim may apply under this Section of this Part for security for his costs of the proceedings.

(2) …

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### CPR 24.13 Conditions to be satisfied

(1) The court may make an order for security for costs under rule 25.12 if –

(a) it is satisfied, having regard to all the circumstances of the case, that it is just to make such an order; and

(b) … one or more of the conditions in paragraph (2) applies,

…

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(2) The conditions are –

(a) the claimant is –

(i) resident out of the jurisdiction; but

(ii) not resident in a Brussels Contracting State, a State bound by the Lugano Convention, a State bound by the 2005 Hague Convention or a Regulation State, as defined in section 1(3) of the Civil Jurisdiction and Judgments Act 1982;

(b) [Omitted]

(c) the claimant is a company or other body (whether incorporated inside or outside Great Britain) and there is reason to believe that it will be unable to pay the defendant's costs if ordered to do so;

(d) the claimant has changed his address since the claim was commenced with a view to evading the consequences of the litigation;

(e) the claimant failed to give his address in the claim form, or gave an incorrect address in that form;

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(f) the claimant is acting as a nominal claimant, other than as a representative claimant under Part 19, and there is reason to believe that he will be unable to pay the defendant's costs if ordered to do so;

(g) the claimant has taken steps in relation to his assets that would make it difficult to enforce an order for costs against him.

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## The Queen (on the application of We Love Hackney Limited) and The London Borough of Hackney [2019] EWHC 1007 (Admin))

Decision of Mrs Justice Farbey dated 28 March 2019

An interesting recent example of an application for security for costs being made to very good effect (from the respondent's point of view) by the respondent to an application for judicial review.

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We Love Hackney - Permission Application

The claimant company sought permission to challenge the legality of the defendant council's Statement of Licensing Policy. It also applied to cap its potential liability for the defendant's costs at £35,000.

The defendant opposed the grant of permission and opposed the application for a cost capping order (CCO). It also applied for an order for security for its costs against the claimant company.

The matter came before Lavender J. on the papers.

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Lavender J. granted permission on the papers. However, he rejected the claimant's application to cap any liability of the claimant for the defendant's costs at £35,000.

He concluded that these were not public interest proceedings and, even if they were, this would not be an appropriate case for a CCO because the claimant company was formed by, amongst others, wealthy individuals who had a commercial interest in the litigation.

However, he adjourned the defendant's application for security for its costs to be considered at an interim oral hearing.

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The claimant sought to renew its application for a CCO. Accordingly, that renewed application by the claimant and the defendant's application for security came before Mrs Justice Farbey at the interim oral hearing that Lavender J. had directed.

Farbey J. rejected the renewed application for a CCO in favour of an impecunious claimant company (We Love Hackney Ltd) with funding from the website CrowdJustice but which also had wealthy individual backers whom the Court concluded did not want to fund the litigation beyond giving third-party support, rather than were unable to do so.

The Court did however grant the respondent council's application for a security for costs order. "In all the circumstances, it would be reasonable to order security in the sum of £60,000 representing the defendant's costs to date … together with an uplift to represent the further costs that may be reasonably incurred to prepare for the substantive hearing."

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The Order of the Court included the following provisions:

The Claimant shall give security for the Defendant's costs to date and to prepare for the substantive hearing in the sum of £60,000, to be paid into Court within 21 days of the date of this Order;

All further proceedings be stayed until such security be given;

Unless such security is given as ordered the Claim be struck out without further order and the Claimant be ordered to pay the Defendant's costs of and occasioned by the Claim, such costs to be the subject of a detailed assessment if not agreed;

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Claimant's application for a costs capping order is dismissed;

Claimant to pay the Defendant's costs of both the Defendant's application for security for costs and the Claimant's application for a costs capping order, such costs to be the subject of a detailed assessment if not agreed;

Claimant shall make a payment on account of the Defendant's costs of both the Defendant's application for security for costs and the Claimant's application for a costs capping order, within 21 days of the date of this Order, in the sum of £20,000.

The upshot was that the claimant failed to make the payment into Court as ordered within 21 days, and the entire claim was accordingly struck out.

This brought the proceedings to an end and meant that the defendant council was never called upon to defend its Statement of Licensing Policy at a full hearing.

Legal Principles applicable to an application for Security

The relevant legal principles were summarised by the Court of Appeal in *Keary Developments v Tarmac Construction* [1995] 3 All ER 534 at 539H-542G, including that:

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– It is for the claimant to satisfy the court that it would be prevented by an order for security from continuing the litigation (*Keary Developments* at 540J).
– If the court is satisfied that it has jurisdiction to order security for costs and that to do so would not stifle the claim, it is normally appropriate to order security (see: *Premier Motorauctions Ltd v PricewaterhouseCoopers llp* [2018] 1 WLR 2955 at [37]).

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– In order to demonstrate that the claim would be stifled, the burden rests on the claimant to show that, realistically, there do not exist third parties who could reasonably be expected to put up security for the defendant's costs (see: *Al-Koronky v Time Life Entertainment Group Ltd* [2005] EWHC 1688 (QB) at [32] - upheld on appeal in [2006] EWCA Civ 1123).

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