



SUBMISSION TO THE LEGAL SERVICES REGULATORY AUTHORITY ON THE ADMISSION POLICIES OF THE LEGAL PROFESSIONS AS REQUIRED BY SECTION 33 OF THE LEGAL SERVICES REGULATION ACT 2015

February 2025

1. INTRODUCTION

The Council of The Bar of Ireland is the accredited representative body of the independent referral Bar in Ireland, which consists of members of the Law Library and has a current membership of approximately 2,150 practising barristers. The Bar of Ireland is long established, and its members have acquired a reputation amongst solicitors, clients and members of the public at large as providing representation and advices of the highest professional standards. The principles that barristers are independent, owe an overriding duty to the proper administration of justice and that the interests of their clients are defended fearlessly in accordance with ethical duties are at the heart of the independent referral bar.

The Council has prepared these submissions at the request of the Legal Services Regulatory Authority who are in the process of preparing a **sixth** annual report for the Minister on the admission policies of the legal professions in accordance with section 33(1) of the Legal Services Regulation Act 2015.

The submission follows the format of the information sought by the Legal Services Regulatory Authority as set out in the correspondence of 19th December 2024:

Section 2 - Specific data requested by the LSRA;

Section 3 - Demand for barrister services in 2024;

Section 4 - Costs of legal services in 2024 and whether these were available at a reasonable cost to consumers;

Section 5 - The standard of education and training for persons admitted to practise;

Section 6 - The extent to which the admissions policies of the legal professions are consistent with the public interest in ensuring the availability of legal services at a reasonable cost, taking into account the demand for services and the need to ensure adequate education and training standards for persons admitted to practise;

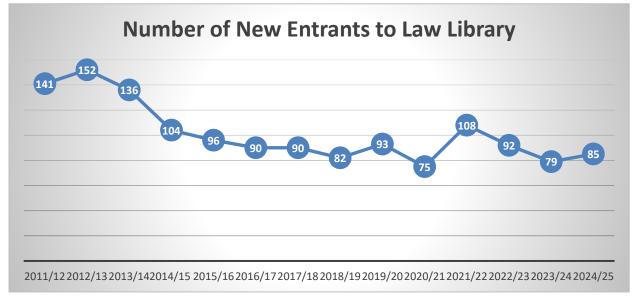
SECTION 2: SPECIFIC DATA REQUESTED BY THE LSRA

LAW LIBRARY MEMBERSHIP

1. The number of members who joined the Law Library in October 2024

A total of **85** new members joined the Law Library in October 2024.

TABLE 1: NUMBER OF NEW ENTRANTS 2011/12 TO 2024/25



2. The number of barristers who ceased membership of the Law Library during the legal year 2023-2024 and the reasons provided for cessation of membership

During the legal year 2023/2024 (October 2023 – September 2024) **110** members ceased membership of the Law Library. A breakdown of the reasons for leaving is set out in the table below:

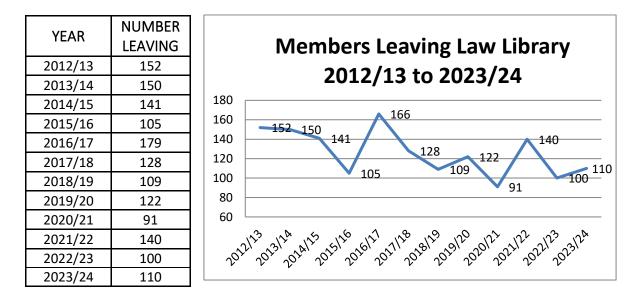
REASON FOR LEAVING	NUMBER
Deceased	4
Excluded Arrears	8
Excluded PII	2
Excluded LSRA Levy	1
Judge	11
Retired	22
Personal	14
Work Elsewhere	21

TABLE 2: BREAKDOWN OF REASONS FOR CESSATION OF MEMBERSHIP 2023/2024

No reason given	26
Financial	1
TOTAL	110

For context, the table below sets out the number of members who left the Law Library during the period 2012/2013 – 2023/2024.

TABLE 3: NUMBER OF MEMBERS LEAVING LAW LIBRARY 2012/13 - 2023/2024
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3. The total number of Law Library members at 31 December 2024

The total number of members of the Law Library at 31 December 2024 was 2,133.

PUPILAGE

4. The number of barristers who commenced pupillage in 2024, with a breakdown by year called to the bar, gender and age (30 and under, 31 and over)

Of the 85 who joined membership of the Law Library in October 2024, 82 commenced their 12-month period of pupillage and 3 were applicants from another jurisdiction who were not required to undergo a period of pupillage.

According to the King's Inns, the total number of barristers called to the Irish Bar in 2024 was 135. Of the 82 new members who commenced a period of Pupillage in October 2024, 53 (65%) were called to the Irish Bar in 2024.

VEAD OF CALL	2012	2010	2010	2020	2024	2022	2022	2024
YEAR OF CALL	2013	2018	2019	2020	2021	2022	2023	2024
OF 82 WHO								
PUPILLED IN	1	1	1	3	3	6	14	53
2024								
GENDER OF 82		MALE			FEMALE			
WHO PUPILLED IN 2024		43			39			
AGE RANGE OF 82 WHO		Under 30 years of age		31 years of age and older				
PUPILLED IN 2024		48		34				

5. The number of barristers who commenced pupillage in 2024 and who completed the:(i) King's Inns full-time BL degree course in 2024(ii) King's Inns modular BL degree course in 2024

(i) King's Inns full-time BL degree course in 2024

Of the 53 that completed the Barrister-at-Law full-time degree course in 2024, 31 entered pupillage in October 2024.

(ii) King's Inns modular BL degree course in 2024.

Of the 69 that completed the Barrister-at-Law degree course in 2024, 21 entered pupillage in October 2024.

6. The number of Masters on the Register of Masters who were available for the October 2024 intake of new pupils, and whether the Bar considers this represented sufficient supply?

The total number of Masters on the Register of Masters held by The Bar of Ireland in October 2024 was **165**. 82 new barristers entered membership of the Law Library in October 2024. The Bar considers this to be sufficient supply for the following reasons:

1. Proportion of Masters Available to Take Pupils

The number of Masters on the Register for the 2024/2025 legal year, totalling 165, provides a substantial pool of potential pupillages in the context of an average annual intake of 80 new members. It is acknowledged that not all of those on the Register for a given year will necessarily enter an arrangement with a pupil in that year. Approximately 25-30 new Masters are enrolled on the Register annually which further enhance the likelihood of prospective entrants securing a pupillage and greatly exceed the numbers seeking to join the Law Library.

2. No Evidence of Pupillage Shortages

There is no evidence to suggest significant challenges in securing pupillages in this jurisdiction. Applications made in good time rarely fail due to a lack of available Masters. As late as 19th September 2024¹, six Masters remained available to enter a pupillage arrangement for October 2024.

The factors underpinning the formation of a Master/Pupil relationship are multifactorial and where applicants have not progressed in a particular year on the grounds that there is no pupillage arrangement in place, the majority of such applicants have been successful the following year.

In comparison, the jurisdiction of England and Wales demonstrates a significantly more competitive landscape. According to recent figures from the Bar Council of England and Wales², the number of applicants for pupillage consistently exceeds the number of pupillages offered. For example, for 2022/23, there were approximately 3,000 applicants for approximately 640 advertised pupillages, indicating a ratio of roughly 4.7 applicants per available position. It should also be noted that, in that jurisdiction, approximately 21% of pupillages offered fail to start. This is not the case in this jurisdiction.

3. Nature of the Master-Pupil Relationship

The relationship between a Master and a Pupil is independent, shaped by multiple factors, including professional compatibility, financial considerations, and the personal responsibility borne by the supervising barrister. Masters face considerable reputational exposure if the pupil is a poor fit with their practice.

4. Sufficient Criteria to Ensure Pupil Readiness

The application process for addition to the Register of Masters ensures that applicants can offer pupils the exposure and range of experiences required to establish a practice at the independent referral bar. This careful selection process reinforces the importance of quality of experience over quantity to safeguard the integrity of the training experience of the Pupil.

5. Alternative Routes and Flexibility

The system offers ample flexibility for applicants who cannot initially secure a Master from the published Register. Opportunities for addition to the Register ensure that any gaps in availability can be addressed. Moreover, completion of a Law Library pupillage is not mandatory for those intending to practise outside the independent referral bar. As stipulated in the King's Inns Code of Conduct, pupillage may also be completed with

¹ 20th September is the final deadline to advise the name of a Master for entry in a given year.

² https://www.barcouncil.org.uk/resource/pupillage-gateway-report-2024.html

any practitioner who has over seven years of experience, offering additional pathways for candidates.

6. Relative Stability in Membership Numbers

Membership of the Law Library remains relatively static suggestive of an appropriate balance between the demand for the services of a barrister and the number of barristers available to undertake this work. Attrition rates are evident in the early years and while some of this may be related to suitability for self-employed career and/or establishing a pipeline of work, delays in payment and cash flow considerations, the attrition rate is suggestive that supply exceeds demand for barrister services from those in their initial years of practice.

ADMISSIONS DEVELOPMENTS & BREAKING DOWN BARRIERS INFORMATION

7. Please provide details of existing Bar of Ireland access initiatives at second and third level and broadly outline The Bar of Ireland's plans to evaluate the effectiveness and impact of these initiatives (Please see recommendation 13 in the Barriers Implementation Plan)

The Bar of Ireland is actively engaged in the promotion of the profession at second and third level through our Transition Year programme: *Look into Law*, University Outreach programme: *Your Call*, and the Denham Fellowship.

Transition Year Programme:

Our TY programme, 'Look into Law', consists of two components:

- Two deliveries of an online Q&A event open to all schools where a panel of barristers answer students' questions about a career as a barrister,
- A four-day hybrid programme for 100 students which consists of two days of online taught components covering key aspects of the justice system and the barrister profession and two onsite days which consist of tours of the Courts and King's Inns, barrister shadowing and participation in a mock trial.

There is no restriction on the number that can participate in the online Q&A events and these events see strong participation from DEIS schools. The four-day programme reserves 20% of places for students from DEIS schools although the final number of participants from DEIS schools is approximately 30-40% as DEIS schools which have not been initially allocated a place are retained in the lottery for the remaining 80 places on the programme.

Students are invited to complete an initial knowledge survey on commencing the programme and this is repeated at the end of the programme, along with questions regarding their intent to pursue a career at the Bar in future. The programme for 2024 received a 4.7/5 score for participant satisfaction with the programme.

The longer-term impact of the programme, is starting to emerge at University level law career fairs and in the intake of pupils where law students and pupils are highlighting the role the of the programme in influencing their decision to pursue a career in law.

University Level Programme:

The Bar of Ireland has recently invested in an expanded range of supports to enhance the promotion of the profession at university level. These include a dedicated member of the executive staff to coordinate the programme of activity across universities.

The Bar attends approximately 8-10 law career fairs annually, where members of the profession volunteer their time to promote the profession to university students. The Bar also provides speakers for other events that showcase the career and the unique expertise of a barrister, such as via a recent advocacy workshop held in UCD.

2024 saw the launch of a new Instagram account to enhance interaction with third level students and this account is seeing increasing levels of engagement with students.

A two-week funded internship programme is also in the process of being launched. This programme is designed to provide interns with a 'behind the scenes' experience of life as an independent referral barrister.

In nominating candidates for the internship, universities will be invited to consider diversity factors in addition to academic and general interest in a career at the Bar.

The Denham Fellowship:

The Denham Fellowship, now in its eighth year, assists two aspiring barristers annually who come from socio-economically disadvantaged backgrounds to gain access to professional legal education at the King's Inns and professional practice at the Law Library.

Those awarded the fellowship are provided with financial, educational and professional support from point of entry to the Barrister-at-Law degree programme at the King's Inns all the way through their first four years of practice at the Law Library.

The programme undergoes regular review by its governing committee with the most recent strategic review of the programme completed in 2023. This review recommended enhancements to the programme including an increase in the stipend available to Fellows.

However, given that the small number of fellows who have completed the programme in full it is not possible at this stage to provide an accurate assessment of the programme's longer-term effectiveness. Early data however suggests that once commenced, Fellows are able to follow the programme through to their exit in year four of practice at the independent referral bar. Typically, the attrition rate at the Bar, within the first four years of practice, is approximately 20%.

8. Please outline any changes to the admission policies of the Bar of Ireland during 2024

There have been no changes to the admission policies to enter membership of the Law Library in 2024.

SECTION 3: DEMAND FOR BARRISTER SERVICES IN 2024

Our 2020 submission provided detail in relation to the services procured by various **state agencies** that gave some level of indication of the demand for barristers' services in the **public sector** – see section 4 of the February 2020 submission.

Civil & Criminal Legal Aid – Professional Fee Levels

In more recent years, demand for the services of barristers in the area of asylum and immigration has increased. In this regard, the draft Programme for Government published on 15 January 2025 provides for *'a dedicated division of the High Court to handle all immigration cases'* and will also *'consider the establishment of a dedicated medical negligence court'*. In this regard, the demand for barrister services in certain areas of civil work that is legally aided, arising from the failure of Government to address the fee cuts that were applied during the FEMPI era, is now translating into an increasing number of barristers withdrawing from providing services to agencies of the State while at the same time demands for their services are increasing. Evidence of this situation is now starting to emerge with a recent report on the International Protection Appeals Tribunal (IPAT).³

The Bar of Ireland has made several submissions to both the IPAT and the Legal Aid Board over the last few years highlighting this growing concern, however, to date, no positive outcome has been achieved and there is no formal mechanism to conduct reviews of professional fees paid to barristers who provide services for the Legal Aid Board, the IPAT and other agencies.

As noted in the LSRA 2024 Annual Report on Admission to the Legal Professions⁴, evidence has emerged in recent years pointing towards a shortage of senior barristers to both prosecute and defend cases in the criminal courts. It is imperative that this emerging shortage is closely monitored, and steps taken to curtail this development, that has arisen primarily from the failure of Government to restore the full FEMPI-era cuts that were applied to the professional fees of criminal barristers during the period 2008/2011 and continue to endure. While it is acknowledged that efforts have been made over the last two Budgets by Government to address this issue - a total fee restoration of 18% has now been implemented - it remains a fact that an outstanding cut of 10.5% continues to apply to the professional fees of criminal barristers and the real value of the fee rates worsen further upon factoring in the recent period of high inflation.

In November 2024, The Bar of Ireland published its Manifesto for Justice in the lead up to the 2024 General Election. In the manifesto, the Council emphasised its priorities and concerns regarding access to courts, including the impact of legal aid and professional fees paid to

³ <u>https://dublininquirer.com/2025/01/22/some-lawyers-who-judge-asylum-appeals-have-gone-on-strike/</u>

⁴ <u>https://www.lsra.ie/wp-content/uploads/2024/07/LSRA_Pathways_S33Annual-Admissions_Report_2023FINAL.pdf</u>

barristers in both criminal and civil legal aid. The Manifesto is available here: <u>https://www.lawlibrary.ie/app/uploads/2024/11/GE-Manifesto-2024-FINAL-FBC.pdf</u>

The Bar of Ireland welcomes the recommendations of the LSRA, endorsed by the Minister for Justice, set out in the 'Breaking Down Barriers: Implementation Plan⁵' to provide 'engagement between relevant stakeholders should be intensified so that the concerns identified in the LSRA research around the levels and structure of professional fees for State funded legal aid work undertaken by junior barristers are explored and addressed' and notes that the LSRA proposes 'to engage with relevant stakeholders to explore recommendation with the purpose of developing a roadmap addressing concerns in a timely manner'. We sincerely hope that there will be full and meaningful engagement from the Department of Justice and the Department of Public Expenditure, NDP Delivery and Reform on this recommendation.

Increase in Judicial Numbers

The Bar of Ireland welcomed the publication of the Report of the Judicial Planning Working Group, together with the OECD Research, in February 2023. This Report emphasised the need for a substantial increase in judicial numbers and recommended appointing 44 additional judges in two phases; with 24 judges appointed in the first phase completed in 2023 and 20 judges appointed in the second phase in October 2024.

Unfortunately, to date, the second phase of judicial appointments has not yet been implemented. The draft Programme for Government (published on 15 January 2025) states that the new Government will 'appoint 20 additional judges within 12 months and plan for further increases to meet growing demands and timely access to justice'. This is a welcome commitment. The report of the Judicial Planning Working Group also recommended that a review take place in 2025 to assess judicial needs up to 2028. This review should determine if further increases in judicial numbers are necessary. An increase in judicial numbers provides additional opportunities for cases to get on, that inevitably contributes to the demand for barrister services.

⁵ See page 27 of the Report <u>https://www.lsra.ie/wp-content/uploads/2024/10/LSRA-Barriers-Report-Implementation-Plan-</u> <u>FINAL.pdf</u>

SECTION 4: COSTS OF LEGAL SERVICES IN 2024

As noted in our submissions over the last two years, Chapter 9 of the Kelly Report addresses litigation costs⁶ and notes that the Review Group had examined various options by means of which the mandate given to it to recommend a reduction in levels of litigation costs might be achieved.

Following the completion by Indecon economic consultants, (commissioned by the Department of Justice), of 'a detailed examination of the recommendations contained within the Peter Kelly report on legal costs...... and a detailed economic and legal evaluation, which will include examining making such scales binding, except where both parties agree to opt out', on 7 February 2024, the Department of Justice published a report titled the <u>Multi-Criteria</u> Impact Evaluation of Options for the Control of Litigation Costs.

The report, prepared by Indecon, represents an independent examination of possible models to control litigation costs in Ireland and endorses the option of non-binding guidelines⁷:

	Table 7.1: Summary of Key Conclusions
ι.	LITIGATION COSTS IN IRELAND ARE SIGNIFICANT AND VARY BY SETTLEMENT CHANNEL
	For employer liability injury settlement cases which were litigated, average legal costs accounted for 33% of
	total settlement costs. Where direct settlements are made, legal costs are lower at between 8-14%, and are
	much lower at between 2-4% when cases are dealt with by PIAB. There is also some evidence that litigation
	costs in other countries are lower than in Ireland although causation is difficult to determine.
2.	MEASURES TO REDUCE LITIGATION COSTS HAVE BEEN IMPLEMENTED IN OTHER COUNTRIES
	There is a lack of clear evidence of the precise impact of reforms in other countries in terms of reducing litigation
	costs or improving service quality. As a result there is no simple solutions which can be transposed to Irish
	circumstances. A number of the measures implemented in other countries, notably in the UK, however, appear to
	have had some impact on reducing costs.
.	DESPITE THE PROGRESS MADE IN RECENT YEARS IN COLLATING AND PUBLISHING DATA ON LEGAL COSTS,
	MAJOR GAPS IN INFORMATION ON THE COSTS OF LITIGATION STILL EXIST
	Work by the Central Bank and other organisations has provided greater clarity on legal costs but significant gaps
	remain. The information gaps reflect a barrier to evidence-based policy and hinders transparency for users of
	legal services. Continued work on improving information is required.
4.	THERE ARE ISSUES RELATING TO THE TWO MAIN OPTIONS WHICH HAVE PREVIOUSLY BEEN IDENTIFIED TO
	REDUCE LITIGATION COSTS NAMELY (I) NON BINDING GUIDELINES ON MAXIMUM LITIGATION COSTS AND (II)
	MAXIMUM LITIGATION COSTS
	On the first option Indecon agrees with the conclusion of the Chair of the Review Group, the Hon. Mr. Justice
	Peter Kelly, that more radical measures than the introduction of non-binding guidelines will be needed if costs are
	to be reduced. Indecon also agrees with the conclusion of the Competition and Consumer Protection Commission
	that the option of non-binding guidelines does not constitute a significant change to the existing process. Indecon
	however believes that binding guidelines depending on how they are implemented and on what level they are set
	may not have the desired results. Indeed, while they have the potential to reduce costs there is a risk that if levels
	are set at average cost elements, costs would rise for most litigants.
9.	THERE IS MERIT IN CONSIDERING ALTERNATIVE NEW OPTIONS TO REDUCE LITIGATION COSTS IN PARTICULAR (I
	NON-BINDING GUIDELINES ON LITIGATION COSTS BUT WITH SIGNIFICANTLY ENHANCED TRANSPARENCY
	MEASURES AND (II) BINDING MAXIMUM LITIGATION COSTS BUT ONLY FOR NON-COMPLEX PERSONAL INJURY
	CASES
	Both of these options would enable policy makers to secure additional information which would facilitate any
	future evidence-based policy reforms which may be needed. The option of non-binding guidelines with enhanced
	transparency measures would act as an incentive for cost reductions.
5.	THE NEW OPTION OF NON BINDING GUIDELINES BUT WITH SIGNIFICANTLY ENHANCED TRANSPARENCY
	MEASURES SCORES MOST HIGHLY IN THE MULTI CRITERIA ANALYSIS
	This option is likely to best facilitate the objectives of enhancing competition and is also likely to have significant
	potential impacts in terms of reducing the cost of litigation, maintaining the quality of service and meeting other
	policy objectives. It would also enable policymakers to have much greater access to information on aspects of the
	cost of litigation. Indecon believes this option merits careful consideration.
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30	ource: Indecon analysis

⁶ See pages 265 - 325

⁷ See page 110 of the Indecon Economic Evaluation of Civil Litigation Cost Models <u>https://www.gov.ie/en/publication/af946-</u> civil-litigation-cost-models-a-multi-criteria-impact-evaluation-of-options-for-the-control-of-litigation-costs/

In the view of The Bar of Ireland, the most optimal manner to positively impact on legal costs is through a combination of four measures:

- 1. Increased investment in the justice system, in particular the number of judges and support staff, better case management and adoption of technology.
- 2. Investment in effective civil legal aid to ensure access to justice for all regardless of means.
- 3. The introduction of non-binding guidelines in respect of legal costs.
- 4. A reduction in state-imposed revenue on a Bill of Costs.

It is noted that the draft Programme for Government published on 15 January 2025 states that the new Government will 'continue work to develop new guidelines to set clear rates and scales of fees for all forms of civil litigation, promoting transparency, competitiveness and fairness in legal costs'.

SECTION 5: THE STANDARD OF EDUCATION AND TRAINING FOR PERSONS ADMITTED TO PRACTISE

Continuing Professional Development Scheme

Prior submissions to the authority have detailed the introduction of a <u>revised CPD scheme</u> for members of the Law Library. In 2024 the Council introduced a randomised audit of compliance with the scheme. This audit is still underway and will provide further information regarding engagement in professional development by the profession.

As noted in our 2024 submission, this scheme only applies to members of the Law Library and those on the Roll of Practising Barrister who are not members of the Law Library, do not have any defined statutory requirement to engage in a prescribed level of CPD. This continues to present a regulatory risk and is one that should be prioritised by the LSRA in the interest of protecting and promoting the interests of consumers relating to the provision of legal services as provided under section 13(4)(c) of the Legal Services Regulation Act 2015.

Pupillage

In addition to the operation of a CPD scheme for members, The Bar of Ireland also oversees the initial professional development of new entrants to the independent referral bar through its pupillage requirements (as set out in the Code of Conduct for The Bar of Ireland and the Guidelines for Pupils and Guidelines for Masters).

The aims of Law Library Pupillage are:

- to train and prepare the pupil for practice as an independent barrister at The Bar of Ireland as part of a supervised practical training year.
- to assist the pupil in establishing the skills necessary for professional practice as an independent barrister.
- to enhance and build on, by way of practical experience, the knowledge and skills gained at the academic and vocational stages of education.
- to assist in the development of the pupil's professional and ethical approach to practise as a barrister, in accordance with the Code of Conduct, the customs and standards of the Bar, and the Legal Services Regulatory Authority ('LSRA') Code of Practice (when commenced).
- to develop and encourage the pupil's proficiency in all areas of advocacy, oral and written, including by:
 - providing opportunities to practise and/or to observe other advocates in court or other tribunals / dispute resolution fora.
 - providing opportunities to develop drafting skills including opinions, pleadings and submissions.
- to educate the pupil in how to deal with relationships between barristers, solicitors and clients including by encouraging them to attend consultations or settlement meetings.

• to develop the pupil's application of effective research skills and to develop the pupil's analytical skills.

During the period 2022- 2023, a research project was initiated by the Education & Training Committee of The Bar of Ireland to examine the learning opportunities provided during pupillage and assess how effectively the pupillage year achieves its goals. The project resulted in several recommendations for improving the programme, which are now actively under review by the Education and Training Committee.

Improvements to the Register of Masters

The *Register of Masters* has undergone several updates to enhance the accuracy of information available to prospective entrants:

- Compliance Declaration: Since 2022, Masters on the Register must submit an annual declaration confirming their continued compliance with the criteria for inclusion.
- Extended Deadline: In 2022, the deadline for adding new Masters to the Register was extended to address delays in prospective entrants finalising arrangements members eligible for addition to the Register.
- Feedback Training: Training for Masters now includes a dedicated section on providing feedback to pupils.
- Revised Application Form: A new application form for addition to the Register was introduced in 2023.
- Practice Area Details: The Register now includes more detailed information on each Master's areas of practice.
- Status Updates: A new column shows the most recent status update for each Master listed on the Register.

SECTION 6: THE EXTENT TO WHICH ADMISSION POLICIES OF THE LEGAL PROFESSION ARE CONSISTENT WITH THE PUBLIC INTEREST IN ENSURING THE AVAILABILITY OF LEGAL SERVICES AT A REASONABLE COST, TAKING INTO ACCOUNT THE DEMAND FOR SERVICES AND THE NEED TO ENSURE ADEQUATE EDUCATION AND TRAINING STANDARDS FOR PERSONS ADMITTED TO PRACTISE

The Bar of Ireland welcomed the publication of the 'Breaking Down Barriers Reports' and Implementation Plan in September 2024. The Bar of Ireland has been reviewing the 32 recommendations contained in the Implementation Plan and has proactively engaged with the LSRA in this regard and will continue to do so over the coming months and years along with the other stakeholders.

CONCLUSION

The Council of The Bar of Ireland welcomes the opportunity to respond to this consultation on the admission policies of the legal professions in accordance with section 33(1) of the Legal Services Regulation Act 2015 and is available to provide any further insight and clarity as may be required.