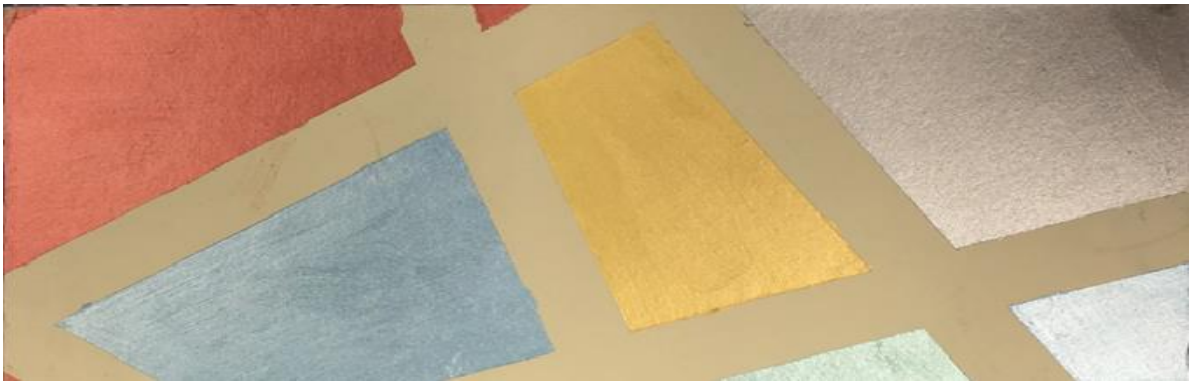
MENTAL CAPACITY REPORT: PRACTICE AND PROCEDURE

September 2018 | Issue 88



Welcome to the September 2018 Mental Capacity Report. Highlights this month include:

(1) In the Health, Welfare and Deprivation of Liberty Report: life-sustaining treatment and the courts, fertility treatment in extremis and an update on the Mental Capacity (Amendment) Bill;

(2) In the Property and Affairs Report: inheritance tax planning and the MCA;

(3) In the Practice and Procedure Report: a new Vice-President, a case study in poor care planning and its costs consequences, deprivation of liberty of children – the Court of Protection or Family Division?;

(4) In the Wider Context Report: an important decision on disability and challenging behavior, guidance from the LGA, ADASS and RCN, and deprivation of liberty looked at overseas;

(5) In the Scotland Report: disability discrimination and unfavourable treatment, AWI consultation response analysis published, and judicial training as part of increasing access to justice for people with disabilities;

You can find all our past issues, our case summaries, and more on our dedicated sub-site here.

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The picture at the top, "*Colourful*," is by Geoffrey Files, a young man with autism. We are very grateful to him and his family for permission to use his artwork.

Contents

Hayden J appointed as Vice-President

As if in response to our plea in the last Report for the appointment of a Vice-President, we congratulate Hayden J on his appointment to the position, and look forward with considerable interest to seeing how the Court of Protection moves forward under his guidance and the overall leadership of the new President, Sir Andrew McFarlane.

Holding prisoner in a foreign land

London Borough of Lambeth v MCS & Anor [2018] EWCOP 14; [2018] EWCOP 20 (Newton J)

Summary

In a pair of excoriating judgments, one as to substance, one as to cost, Newton J addressed the consequence of "*disorganised, muddled and unfocused decision making, and what has at times verged on an arrogance*," leading a Colombian woman into *"years of misery from being kept a prisoner here, against her will*."

On 1 May 2014, whilst waiting at a bus stop, P collapsed and but for the prompt actions of a member of the public who commenced CPR, would likely not have survived. Paramedics arrived, P was found to have suffered a cardiac arrest. She was taken to St Thomas' hospital who diagnosed narrowing of the arteries to the heart; she had emergency bypass surgery the same day. Subsequently P was diagnosed as having sustained hypoxic brain injury as a result of oxygen starvation to the brain when she collapsed. On 1 September 2014 she was transferred to the Royal Hospital for Neurodisability in Putney, where she remained for well over 3 years. She displayed the classic signs of hypoxic injury, that is to say, severe cognitive impairment with memory problems, speech problems and physical difficulties requiring significant care input. Although she lacked capacity to decide upon her future residence, she was "*absolutely consistent, and at every opportunity […] made abundantly clear her wishes to be able to return to Columbia, where she would have the care and support of a large and concerned extended family*." Over time, she made significant cognitive improvement such as to allow her to vent her frustration, whether it be with language (she was a Spanish speaker and

does not understand English), her impairments, or the care plan provided to her. There was, similarly no question but that it was in her best interests to repatriated to Columbia.

A consistent theme recorded in every document was how very much better P functioned, and was so much happier, when she could communicate in Spanish. On 29 October 2014 P's assessed needs recorded "*as detailed in previous sections, a Spanish speaking environment is essential for P's participation, care and wellbeing*" and "*Spanish staff should be available 24 hours a day with regular attendance for monitoring*." However, there was never any formal provision supporting P's need for Spanish speaking staff, which at best was provided on an ad hoc basis. As Newton J noted, "*P is distressed by receiving care from people who cannot speak Spanish, this has happened almost every day, several times a day, for over 3 years. It takes very little imagination to consider how additionally miserable and isolated she must have felt. Reports describe her as distressed, feeling like she is drowning, feeling scared, complaining of pain, each impacting severely on her everyday wellbeing*."

P was likely to have been ready for discharge in 2014; she was undoubtedly ready by 2 January 2017. She was subject to DOLS, and her RPR – in December 2015 – applied on her behalf "*out of frustration because, despite the local authority and the Lambeth CCG supporting P's wish and desire to return to Columbia, they had simply failed to progress it*." The proceedings were initially met by the response that P now had capacity about decisions about where she should live – as Newton J noted, "*I am not at all sure that that contention does not in fact make the situation worse.*" However, a Special Visitor's Report of March 2017 confirmed that she lacked capacity. Matters then progressed very slowly in terms of progressing repatriation; from Newton J's distinctly caustic summary of the procedural history thereafter, we take one example:

> *In view of the history, the shocking history, I made provision for a "long stop" hearing on 13 December 2017 whilst sitting on circuit (hoping still to retain the transfer date of 20 December 2017). I do not think I ever received a position statement from the applicants, who attended by new counsel, who had been inadequately instructed. No one from the applicants, CCG or solicitors had the courtesy to attend. To say this was unfortunate (leaving aside any other issues) is an understatement. No transfer plan had been filed, and important missing detail prevented any progress being achieved. No one appeared to be qualified to make what in some instances were trifling decisions involving a few hundred pounds, e.g. innumerable communications occurred over the provision of, cost of, source of, import duty on, or who should pay for the transport of a wheelchair so urgently required by P, far, far exceeding the cost of the chair itself. Information was given to the Court in relation to, for example, the air ambulance, which subsequently appeared to be wholly misleading and totally without foundation. The approach taken was unhelpful and, at times, verging on petulant. Despite my best efforts it appeared to reflect a deeper, most unfortunate perspective that has, from time to time, permeated these proceedings. In any event, as I say, no one had the courtesy to turn up, so nothing constructive could be achieved at all.*

Finally, on 15 January 2018, "*it was possible to approve a final order. Contrary to previous occasions when either no one attended, or those present had not obtained delegated financial responsibility, on this occasion, what should have occurred much, much earlier, probably years ago, was obtainable, and significant assurances and undertakings were forthcoming for the provision of care in the unlikely event P was taken ill in transit and required hospitalisation en route. All that should have occurred several months earlier and it is entirely symptomatic of the malaise which has beset these proceedings from the outset. For which P has been the unhappy victim, and the Applicant* [local authority] *entirely responsible*." She left the UK by air ambulance on 25 January 2018:

> *"The move went very well. There were no health concerns en route. P remained calm, restful and slept during the journey. The ambulance crew were extremely impressive and efficient. The doctor could speak Spanish. Upon arrival P "recognised many of her relatives and smiled all over her face.""*

In light of this conclusion, it was not surprising that in the second judgment, Newton J was asked by the Official Solicitor on P's behalf to order that the entirety of the costs of the proceedings should be borne by the London Borough of Lambeth and the Lambeth Clinical Commissioning Group on the basis a) that the proceedings should never have been brought and b) their conduct of the proceedings once commenced.

Newton J noted that:

> *2. Proceedings brought in the Court of Protection almost never attract an enquiry into the issue of costs, essentially since they are inquisitional in nature, the general costs principles do not sit easily within the parameters of the Court's considerations. However, as the President recognised in Re G [2014] EW COP 5, there will occasionally be cases but there must be good reason before the Court will contemplate departing from the general rule. For example an order for costs was made in Re SW [2017] EW COP 7 where the application was "scarcely coherent … totally without merit … misconceived and vexatious". These proceedings would not necessarily be categorised in that way, but what if they were or should have been fundamentally unnecessary, that is to say they should never have been brought? Or what if the conduct of the proceedings been so poor, so incompetent that not only did they take much longer than they should (thus unnecessarily necessitating P remaining for so very much longer in difficult circumstances) and requiring many extra unnecessary hearings? In those circumstances is the Court not able to mark its disapproval by the consideration and award of costs.*

He continued:

> *3.* […] *It is obvious that the Court is deeply critical of the manner in which this case was handled both before and after the institution of proceedings. It is further troubling that even within the written submissions are many misconceived assertions or contentions as to fact. The proceedings were instigated by P's RPR in December 2016 because no constructive progress for P was being made. P was unsettled, unable to communicate, frustrated and quite evidently deeply unhappy. A situation which could and should have been avoided. As the chronology in the*

judgment makes clear, by the end of 2014 or early 2015 at the latest, P was ready for discharge but the enquiries lacked focus or persistence, and whilst I have no doubt that the Applicant and/or Second Respondent believe they worked tirelessly, the bald fact is that they did not. The enquiries were ineffectual, even amateur. Apparent "unexplained difficulties in dealing with the Columbian authorities and organisations" were not subsequently born out. Inexplicably, basic common sense enquiries with the Columbian Embassy had still not occurred many months into the proceedings. As I have found, their efforts were unfocused and superficial. This might be thought to be explained by the apparent novelty of the situation as it presented itself, but what happened during the currency of the proceedings supports the contrary view, that too little intelligent professional focus was brought to bear and bring this most unhappy situation to a conclusion. To submit that the CCG was "throughout commendably assiduous" in seeking the return to Columbia is about as misplaced and offensive a submission as could possibly be contemplated. The judgment records, order after order which was not complied with. Equally, it is submitted "the Applicant and Second Respondent remind the Court of the expressions of satisfaction given by P's family and by the Columbian Government on her behalf". They recognise that the CCG worked tirelessly to repatriate P in exceptional circumstances. It would be unfortunate if those efforts were met with a punitive order for costs. Such a submission is at best misplaced. How much more satisfied would P have been to have been repatriated years earlier, rather than being kept caged in an environment and jurisdiction where she was so obviously unhappy and did not belong.

4. It should not be thought that I overlook the care that was provided to P, nor, ultimately her successful repatriation, but what is impossible to ignore is the disorganised thinking, planning and management which resulted in her detention here for so very much longer than necessary.

5. Without hesitation I conclude that the circumstances of this case are so poor and so extreme (both in relation to institution of proceedings and their subsequent conduct) that I should make an order that the costs of the proceedings should be born by the Applicant and Second Respondent.

Comment

Repatriation cases are, in our experience, complex, and most public authorities are unlikely to encounter them often, adding novelty to complexity. But the picture painted by Newton J in this thoroughly depressing case is not just one which has all the hallmarks of a situation being put in the “too difficult to handle box” by too many people, but also one where basic consideration of support needs appears to have gone out of the window.

We would also note – given the passage of the LPS through Parliament – that this is undoubtedly a case where the bringing of a s.21A challenge was the only thing which actually unlocked matters, even if at glacial speed. One rather shudders to think what would have happened had P not been subject to a DoLS, and therefore had the benefit of an RPR – would she still be in “prison” here?

HRA claims and the statutory charge

The LAA has finally confirmed that it is possible (and how it is possible) to run an HRA claim arising out of publicly funded welfare proceedings in the Court of Protection without seeing any resulting damages swallowed up entirely by operation of the statutory charge. For more details, see the guest post by Ragani Lindquist on the Court of Protection Handbook website here.

Electronic issue of proceedings in London

From 30 July, the Court of Protection Central Registry (First Avenue House) will allow court users to issue section 16 (Health & Welfare) and 21A (Deprivation of Liberty) applications via email. This will bring the Central Registry in line with the Multiple Points of Entry scheme, which launched nationally on 25 June. For more details, see here.

Deprivation of liberty for 16/17 year olds - the CoP or Family Division?

Re A-F (Children) (No 2) [2018] EWHC 219 (Fam) High Court (Family Division) (Sir James Munby P)

Deprivation of liberty – children and young persons – CoP jurisdiction and powers – interface with family proceedings

Summary

In one of his last judgments as President, Sir James Munby returned to the question of what to do where a 16 or 17 year old with impaired capacity is deprived of their liberty, and, specifically, whether judicial authorisation should be sought in the Court of Protection or the Family Division under its inherent jurisdiction. He had previously addressed the question of the process for obtaining such authority in *Re A-F (Children) (Restrictions on Liberty)* [2018] EWHC 138 (Fam), but that judgment had left opaque the question of which court authority should be sought in the case of a 16 or 17 year old.

As Sir James noted, the Mental Capacity Act 2005 (Transfer Of Proceedings) Order 2007, SI 2007/1899, provides for the transfer of proceedings in relation to children aged 16 and 17 from or to the Court of Protection, Article 3 concerning transfers to that Court. Sir James endorsed the summary of the relevant principles given by Hedley J in *B (A Local Authority) v RM, MM and AM* [2010] EWHC 3802 (Fam), para 28:

> *That raises the question particularly under Art 3(3)(d) as to what matters the court should take into account in deciding whether to exercise these powers and to adopt this approach. An ex tempore judgment in a case on its own facts is no basis for attempting an exhaustive analysis of these issues; nevertheless, a number of matters suggest themselves, matters which may often be relevant in the relatively small number of cases in which this issue is likely to arise. One, is the child over 16? Otherwise of course, there is no power. Two, does the child manifestly lack capacity in respect of the principal decisions which are to be made in the Children Act proceedings? Three, are the disabilities which give rise to lack of capacity lifelong or at least long-term? Four, can the decisions which arise in respect of the child's welfare all be taken and all issues resolved during the child's minority? Five, does the Court of Protection have powers or procedures*

more appropriate to the resolution of outstanding issues than are available under the Children Act? Six, can the child's welfare needs be fully met by the exercise of Court of Protection powers? These provisional thoughts are intended to put some flesh on to the provisions of Art 3(3); no doubt, other issues will arise in other cases. The essential thrust, however, is whether looking at the individual needs of the specific young person, it can be said that their welfare will be better safeguarded within the Court of Protection than it would be under the Children Act.

In the cases before the President, the children were already subject to care orders, and he agreed with the position of the parties that their cases should not be transferred to the Court of Protection, for the following reasons:

i) There can be no sensible basis for discharging any of the care orders which are already in place. The children require the continuing protection of such aspects of the care regime as LAC reviews and the support of an IRO.

ii) While the care orders remain in place, the Family Court has a continuing, if much reduced, potential role in the lives of the children – for instance, if issues in relation to contact require to be determined in accordance with section 34 of the 1989 Act.

iii) For the time being, at least until they are approaching their eighteenth birthdays, the children are the responsibility of the local authority's Children's Social Care (LAC) Teams, who are, in the nature of things, much more familiar with practice and procedure in the Family Court and the Family Division than with practice and procedure in the Court of Protection.

iv) The children's guardians will be able to continue exercising that role so long as the cases remain within the Family Court and the Family Division; it is, at the least, doubtful whether they would be able to act as litigation friends in the Court of Protection.

v) It may be easier to ensure judicial continuity if there is no transfer.

vi) Put shortly, the benefits weigh heavily in favour of maintaining the forensic status quo. There are, in contrast, so far as I can see, no reasons for thinking that, to adopt Hedley J's words, the children's welfare will be better safeguarded within the Court of Protection.

As an annex to the judgment, the President attached three draft forms of order for use in caes where authority to deprive the child of their liberty was being sought from the Family Division: (i) directions on issue; (ii) order following first hearing; and (iii) order following final hearing. These drafts are each in a form compatible with the Compendium of Standard Family Orders. As he noted, "[i]t *will, of course, be for Sir Andrew McFarlane, as President of the Family Division, to determine in due course whether they should be formally promulgated as additions to the Compendium*." He further annexed a suggested form of social work template (including the following requirements):

Section 4 Analysis of confinement

(Describe the proposed placement and regime explaining why they are necessary and proportionate in meeting

the child's welfare needs and that no less restrictive regime will do.)

Section 6 Child's level of understanding / Gillick competence

(Whether the child is able to consent, by reference to Gillick competence, and the steps which have been taken to ascertain this aspect – details as to any expert assessments which have been undertaken in this respect.)

Comment

The vexed question of when a 16/17 year old should be considered to be deprived of their liberty is to be looked at by the Supreme Court on 3 and 4 October in the *D* case (in which the Government has now intervened). The question of whether authority is required from a court to deprive a 16/17 year old with impaired capacity is going to remain open for some time, as the Government continues to "*consider[…] very actively*" whether or not to bring them within the scope of the LPS.

This judgment, and the preceding one in the series, looks at the procedural questions arising where judicial authority is being sought in the event that 16/17 year is considered to be deprived of their liberty. Where the application is made to the Court of Protection, then the procedure set down in COPDOL11 should be followed. One real oddity of the second judgment, and perhaps reflecting the perhaps unfortunate 'siloing' between family and CoP practitioners that can occur in this zone, is that in neither the social work template nor the draft orders is there any requirement to set out the basis upon which it is said that the deprivation of liberty is justified for purposes of Article 5 ECHR.

Simply providing that a deprivation of liberty is lawful and in the child's best interests does not address the fact that Article 5(1) provides an exhaustive list of the bases upon which deprivation of liberty can be justified. Is the deprivation of liberty justified on the basis of Article 5(1)(d) (the detention of a minor by lawful order for the purpose of educational supervision) or 5(1)(e) (i.e. unsoundness of mind?). We would strongly recommend that practitioners seeking orders from the Family Division make clear what basis the deprivation of liberty is to be justified, and to put in evidence accordingly.

Eagle-eyed readers will also note that the annexes to the judgment proceed – unsurprisingly – on the same basis at did the Court of Appeal in *D*, i.e. that *Gillick* competence runs to age 18. Whether that is correct, and how this concept interacts with the statutory presumption of mental capacity in the MCA 2005, is no doubt going to be examined by the Supreme Court in October.

Short note: fact-finding and the burden of proof

In *Re A (Children)* [2018] EWCA Civ 1718, the Court of Appeal reminded practitioners and the judiciary how rare it is that burden of proof will serve as the determinative factor in a fact-finding case. King LJ (with whom the other two judges agreed)

> *accept*[ed] *that there may occasionally be cases where, at the conclusion of the evidence and submissions, the court will ultimately say that the local authority has not discharged the burden of proof to the requisite standard and thus decline to make the findings. That this is the case goes hand in hand with the well-*

> *established law that suspicion, or even strong suspicion, is not enough to discharge the burden of proof. The court must look at each possibility, both individually and together, factoring in all the evidence available including the medical evidence before deciding whether the "fact in issue more probably occurred than not" (Re B: Lord Hoffman).*

She confirmed that the proper approach is that:

> *i) Judges will decide a case on the burden of proof alone only when driven to it and where no other course is open to him given the unsatisfactory state of the evidence.*
>
> *ii) Consideration of such a case necessarily involves looking at the whole picture, including what gaps there are in the evidence, whether the individual factors relied upon are in themselves properly established, what factors may point away from the suggested explanation and what other explanation might fit the circumstances.*
>
> *iii) The court arrives at its conclusion by considering whether on an overall assessment of the evidence (i.e. on a preponderance of the evidence) the case for believing that the suggested event happened is more compelling than the case for not reaching that belief (which is not necessarily the same as believing positively that it did not happen) and not by reference to percentage possibilities or probabilities.*

Guardianship (Missing Persons) Act 2017

The Government has confirmed that implementation of this Act has been delayed indefinitely – thereby depriving the Court of Protection of a small (but very important) jurisdiction to grant a 'guardianship order' to relatives or close friends of a missing person so they could manage the missing person's property and financial affairs without having to obtain a declaration of presumed death. As reported by Family Law, a letter from the Ministry of Justice to MPs has revealed that the delays have been caused "*by work on key departmental priorities.*"

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Alex is recommended as a 'star junior' in Chambers & Partners for his Court of Protection work. He has been in cases involving the MCA 2005 at all levels up to and including the Supreme Court. He also writes extensively, has numerous academic affiliations, including as Wellcome Research Fellow at King's College London, and created the website www.mentalcapacitylawandpolicy.org.uk. To view full CV click here.

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Annabel has experience in a wide range of issues before the Court of Protection, including medical treatment, deprivation of liberty, residence, care contact, welfare, property and financial affairs, and has particular expertise in complex cross-border jurisdiction matters. She is a contributing editor to 'Court of Protection Practice' and an editor of the Court of Protection Law Reports. She sits on the London Committee of the Court of Protection Practitioners Association. To view full CV click here.

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Nicola appears regularly in the Court of Protection in health and welfare matters. She is frequently instructed by the Official Solicitor as well as by local authorities, CCGs and care homes. She is a contributor to the 4th edition of the *Assessment of Mental Capacity: A Practical Guide for Doctors and Lawyers* (BMA/Law Society 2015). To view full CV click here.

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Simon has wide experience of private client work raising capacity issues, including *Day v Harris & Ors* [2013] 3 WLR 1560, centred on the question whether Sir Malcolm Arnold had given manuscripts of his compositions to his children when in a desperate state or later when he was a patient of the Court of Protection. He has also acted in many cases where deputies or attorneys have misused P's assets. To view full CV click here.

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Adrian is a recognised national and international expert in adult incapacity law. While still practising he acted in or instructed many leading cases in the field. He has been continuously involved in law reform processes. His books include the current standard Scottish texts on the subject. His awards include an MBE for services to the mentally handicapped in Scotland; national awards for legal journalism, legal charitable work and legal scholarship; and the lifetime achievement award at the 2014 Scottish Legal Awards.

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Conferences

Conferences at which editors/contributors are speaking

Switalskis Annual Review of the Mental Capacity Act

Neil is speaking at the 10th Annual Review of the MCA in York on 18 October 2018. For more details, and too book, see here.

Taking Stock

Neil and Alex are speaking at the annual Approved Mental Health Professionals Association/University of Manchester taking stock conference on 16 November. For more details, and to book, see here.

Other events of interest

Peter Edwards Law has announced its autumn programme of training in mental capacity and mental health, full details of which can be found here.

Advertising conferences and training events

If you would like your conference or training event to be included in this section in a subsequent issue, please contact one of the editors. Save for those conferences or training events that are run by non-profit bodies, we would invite a donation of £200 to be made to the dementia charity My Life Films in return for postings for English and Welsh events. For Scottish events, we are inviting donations to Alzheimer Scotland Action on Dementia.

Our next edition will be out in early October. Please email us with any judgments or other news items which you think should be included. If you do not wish to receive this Report in the future please contact: marketing@39essex.com.

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