Health and safety law update

June 2016

News

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The Ministry of Defence face censure over Brecon Beacons SAS training deaths

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Case law

Fines and sentences

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Travis Perkins fined £2m in the second highest fine so far under the new sentencing guidelines

The fine follows an incident on 9 November 2012, when a customer was run over by a Travis Perkins Trading Company (TP) vehicle in the loading area of the Wolverhampton branch. Mark Pointer had parked his Landrover in one of four parking bays and was loading planks onto the roof rack when a cargo strap snapped, causing him to fall to the floor. At that precise moment, a TP flatbed lorry was attempting to manoeuvre between Mr Pointer's vehicle and

Any comments or queries?

Nick McMahon
Head of Health and Safety
+44 20 3060 6896
nick.mcmahon@rpc.co.uk

Gavin Reese
Partner
+44 20 3060 6895
gavin.reese@rpc.co.uk

Mamata Dutta
Legal Director
+44 20 3060 6819
mamata.dutta@rpc.co.uk

Martin Hunter
Associate
+44 20 3060 6119
martin.hunter@rpc.co.uk

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A national crane-hire company fined £750,000 following the death of two men in crane collapse

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In our last bulletin we reported the HSE's decision to prosecute Merlin following the highly-publicised incident at Alton Towers theme park on 2 June 2015 in which five people were seriously injured on a rollercoaster, when their carriage collided with an empty stationary carriage on the same track.

Merlin pleaded guilty to a breach of section 3(1) of the Health and Safety at Work Act 1974 at a hearing on 22 April 2016 at North Staffordshire Justice Centre. Merlin issued the following statement:

"Merlin Attractions Operations Limited today pleaded guilty to an offence under the Health and Safety at Work Act. From the outset, the company has accepted responsibility for what happened in June last year and it has co-operated fully with the Health & Safety Executive in its investigation. We have sought to provide help and support to all those injured in the accident and will continue to do so."

With an annual turnover of £250m Merlin will fall within the category of a large organisation (turnover £50m+) for the purposes of sentencing, with the suggested range of fine being £2.6m to £10m. However, the sentencing guidelines state that where turnover "very greatly exceeds the threshold for large organisations, it may be necessary to move outside the suggested range to achieve a proportionate sentence".

District Judge John McGarva said the company faced "very high culpability" over the incident and "may be ordered to pay a very large fine".

No comment was made as to whether the company's turnover "very greatly exceeds" the threshold for large organisations. That is likely to be a point argued at the sentencing hearing in due course.

Back to contents>

The Ministry of Defence face censure over Brecon Beacons SAS training deaths

The HSE has announced that it will administer a Crown censure to the MoD following the deaths of three soldiers over failures during an SAS training exercise.

As the Crown cannot be prosecuted for breaches of the law, including failure to comply with improvement and prohibition notices (section 48(1) HSWA 1974), a Crown censure can be administered. This is the maximum sanction the HSE can bring against the Crown. Whilst no fine is ordered, the censure formally records the decision that, but for Crown immunity, the evidence of a Crown body's failure to comply with health and safety law would have been sufficient to provide a realistic prospect of securing a conviction.

Lance/Cpl Edward Maher, Lance/Cpl Craig Roberts and Cpl James Dunsby died during a 16-mile march through the Brecon Beacons on one of the hottest days of 2013. An inquest found that they died after suffering the effects of hyperthermia.

The HSE investigation found that the MoD failed to plan, assess and manage the risks associated with the training exercise.

The MoD accepted the censure. An ongoing investigation into the role of individuals is being carried out by the Royal Military Police.

Back to contents>

Curry restaurateur jailed for six years for gross negligence manslaughter after customer suffered fatal peanut allergy

In what is thought to be the first case of its kind, an Indian restaurateur, Mr Zaman, aged 53, was imprisoned for six years after providing a takeaway containing peanuts to 38 year-old Paul Wilson, who suffered a fatal allergy as a result.

Mr Wilson had ordered a takeaway containing no nuts, but it later transpired that the takeaway was cooked with a groundnut mix containing peanuts. This was despite the takeaway package and order slip at the restaurant being marked as containing no nuts.

Judge Simon Bourne-Arton sitting at Teeside Crown Court said this was not a "transitory" case of gross negligence, but one lasting seven months when Mr Zaman switched almond powder for a cheaper groundnut mix in June 2013 in order to save costs. Mr Zaman owned six restaurants in York and North Yorkshire and was said to have debts of around £300,000.

Only one month prior to Mr Wilson's death in January 2014, another nut allergy sufferer, Ruby Scott, 17, was hospitalised after eating a meal from another of Mr Zaman's restaurants. She had been told that her dish did not contain peanuts, but she suffered an allergic reaction requiring an injection of adrenaline.

This incident resulted in a visit by a trading standards officer a week before Mr Wilson's death. On that visit, evidence was found of peanuts in a meal the officer had been told was peanut-free. Despite warnings by trading standards about informing customers of food containing nuts, Mr Zaman seemingly continued using the less costly ingredient without warning customers.

Mr Zaman denied manslaughter by gross negligence, perverting the course of justice, and six food safety offences. He was found guilty of all charges, except perverting the course of justice.

The judge said Mr Zaman could have destroyed the groundnut mix after Ruby Scott had suffered a reaction, but had chosen not to. The judge further commented that Mr Zaman had told "many lies" and told him that "You remain in complete and utter denial for what you have done." The CPS said the owner had "put profit before safety" at his restaurants.

This case sends out a clear message to businesses about the critical importance of compliance with food safety. The CPS issued the warning that "If you ignore your responsibilities and regulations and put lives at real risk then we will not hesitate to prosecute."

Back to contents>

Case law
Fines and sentences

Two cases involving trench collapses which caused death result in multi million pound penalty for one defendant and prison for another

On 14 April 2010 James Sim, a 32-year-old sub-contractor for Balfour Beatty Utility Solutions Limited was working in a trench laying ductwork for an offshore windfarm being constructed by Heysham, Lancashire. The trench was dug to a depth of 2.4 metres without any shoring. The trench subsequently collapsed trapping Mr Sim causing fatal injuries.

The court heard how Balfour Beatty had failed to adequately risk assess the works or control the way in which the excavation took place. It pleaded guilty to a breach of Section 3(1) HSWA 1974, Regulation 31(1) of the Construction (Design and Management) Regulations 2007 and Regulation 3(1)(a) of the Management of Health and Safety at Work Regulations 1999.

Balfour Beatty was fined £2.6m and ordered to pay costs of £54,000.

In another trench collapse case, self-employed contractor William Ryan Evans was contracted to construct a drainage field comprising of infiltration pipes laid at the bottom of deep trenches. He employed two workers and a subcontractor to undertake the work at Longstone Farm, in Pembrokeshire.

On 26 June 2012 Hywel Glyndwr Richards, aged 54, entered the trench to remove some soil when it collapsed, burying him and causing fatal injuries.

The HSE concluded that the work was not planned appropriately and the risk assessment was unsuitable and insufficient. There was inadequate training of the workers and unsuitable work equipment.

William Ryan Evans, of Carmarthenshire was found guilty at Swansea Crown Court of breaching Section 2 HSWA 1974 and given a six month custodial sentence.

HSE Inspector Phil Nicolle said: "This tragic incident could have been prevented by undertaking a suitable and sufficient assessment of the risks, providing the correct equipment or safe working methods to the workers and managing and monitoring the work to ensure it was done safely."

He added: "Work in excavations needs to be properly planned, managed and monitored to ensure no one enters an excavation deeper than 1.2m without adequate controls in place to prevent a collapse."

The two cases highlight the particular hazards involved in working with trenches, and the need to ensure that such work is properly planned and risk assessed in advance.

Back to contents>

Travis Perkins fined £2m in the second highest fine so far under the new sentencing guidelines

The fine follows an incident on 9 November 2012, when a customer was run over by a Travis Perkins Trading Company (TP) vehicle in the loading area of the Wolverhampton branch. Mark Pointer had parked his Landrover in one of four parking bays and was loading planks onto the roof rack when a cargo strap snapped, causing him to fall to the floor. At that precise moment, a TP flatbed lorry was attempting to manoeuvre between Mr Pointer's vehicle and a company lorry which had been incorrectly parked in the loading bay area. The driver of the TP vehicle continued the manoeuvre without realising Mr Pointer had fallen and ran over him causing fatal crush injuries.

The prosecution was brought by Milton Keynes Council, who alleged that the loading and unloading activities were undertaken in an unsafe manner and that the risk of individuals falling in such an area was common. As such, loading and unloading should have been carried out in an area away from pedestrians and others not involved in the operation.

TP pleaded guilty to breaches of sections 2(1) and 3(1) HSWA 1974, but the Council did not accept the basis of those pleas, namely that the failures were not a significant cause of harm. A Newton hearing followed, that is a hearing to determine whether the failures were causative of the risk. Whilst TP ultimately accepted there was a causal link, they disputed the proposed category of harm of "high" under the sentencing guidelines.

At the hearing, the culpability of TP was categorised as "medium", reflecting that systems were in place but were not sufficiently implemented or adhered to. The prosecution argued that risk of harm was high, which gave an overall harm category of 1 in the guidelines, the most serious of the three categories available. TP argued that the overall harm category should be 3, or 2, suggesting that the incident was highly unusual.

Judge Justin Cole accepted the prosecution case that the risk of harm was high, noting a well-documented risk of falling, and that collision with an HGV was likely to result in serious injury or death.

With a turnover of £2bn, TP fell into the category of a "very large" organisation under the sentencing guidelines, namely a business with turnover very greatly in excess of £50m. For organisations of that size, the guidelines make clear that it may be necessary to move outside the range of sentence suggested for large organisations.

Judge Cole made clear that had TP not taken steps to mitigate the risk of a further incident, which included implementing new systems for deliveries on site, improving signage, introducing moveable barriers to cordon off areas and improved assessment of the risk and training for those on site to act as banksmen, it was likely the fine would have been set beyond the applicable range for large companies. In view of the aggravating features, however, the judge concluded that the fine should be set at the upper end of the range.

For a large organisation convicted of an offence of medium culpability and a harm category of 1, the starting point is £1.3m with a range of £800,000 – £3.25m. Using a starting point of £3m, Judge Cole applied a discount to reflect that TP had pleaded guilty at the first opportunity. He imposed a fine of £2m which was broken down as £1m for each offence. In addition, TP was ordered to pay £114,813 for the prosecution's costs.

As well as being the second highest fine to be imposed under the new sentencing guidelines, this is the largest health and safety fine to date imposed in a prosecution by a local authority.

Back to contents>

Two directors imprisoned after fatal fall through skylight occurred only hours after similar incident

C Smith and Sons (Rochdale) were contracted to demolish the Harveys and Carpetright buildings in Stockport in 2014. Instead of demolishing the buildings with plant machinery as planned, one of the directors, Michael Smith, decided to dismantle the building piece by piece so that some parts of the roof could be sold on.

The dismantling of the roof, which comprised of corrugated steel sheets and plastic skylights, was sub contracted to Building and Dismantling Contractors who hired four workers for the job via their sole director, Allan Thomson.

On 20 January 2014 one of the workers, Scott Harrower, inadvertently stepped onto a skylight, but avoided falling onto the concrete floor below. At 9am the following day, a second worker fell through a skylight and sustained significant injuries, including a fractured pelvis, spine and injuries to his leg and wrist. The Police attended, but their involvement was limited to advising those on site to notify the HSE of the incident. Michael Smith then ordered the workers back onto the roof to make it safe. Later that afternoon, Scott Harrower (the worker who had managed to avoid falling through the skylight only the day before) sustained fatal injuries after falling through a skylight.

The HSE found that the work was not properly planned or supervised, and adequate precautions were not in place. Both directors, who were the sole decision makers for their respective companies, were said to have cut corners in order to make a "quick profit". Judge Mark Turner stated that Thomson had made a "callous and disgraceful" attempt to produce health and safety paperwork following the incidents, which would have laid the blame on Mr Harrower himself.

After a trial:

- Allan Thomson was convicted of gross negligence manslaughter and was imprisoned for six years, with an additional term of 20 months to be served concurrently after he pleaded guilty to three HSWA offences. He was also disqualified from acting as a director for two years
- B & DC pleaded guilty to breach of Section 2(1) HSWA and two breaches of the Working at Height Regulations and was fined £400,000
- Thomson and B & DC were ordered to pay costs of £55,000
- Michael Smith was convicted of three breaches of the HSWA for causing his company to be in breach by his consent, connivance or neglect and was imprisoned for eight months
- C Smith & Sons was fined £90,000 for three breaches of the HSWA, Working at Height Regulations and CDM Regulations
- Smith and his company were also ordered to pay costs of £45,000.

Back to contents>

McCain Foods (GB) Limited fined £800,000 after severe arm injuries to employee

McCain, the major frozen food manufacturer, pleaded guilty to breaches of Regulation 11(1) of the Provision and Use of Work Equipment Regulations 1998 and Section 2(1) HSWA 1974.

The case was heard at Peterborough Crown Court and concerned a 34-year-old employee who, on 21 August 2014, was attempting to check the condition of the head roller on a bypass conveyor. His arm became entangled in the machine, causing very serious injury. His arm was saved, but he now has limited movement.

The HSE investigation revealed that the machine did not have the correct guards fitted and that the risk assessment failed to recognise the consequent danger. McCain was fined £800,000 and ordered to pay costs of £12,831.

Back to contents>

A national crane-hire company fined £750,000 following the death of two men in crane collapse

In September 2006 a crane operator, Jonathan Cloke, 37, died after falling from a crane as it collapsed on a site in London. Part of the crane fell on to a member of the public, Michael Alexa, 23, causing fatal injuries.

Southwark Crown Court heard how sections of the crane, being operated on a housing development in Battersea, separated when 24 bolts failed due to metal fatigue. The bolts connected the mast to the slew turret allowing the crane jib to rotate through 360 degrees. When the bolts failed, the slew turret and jib separated from the mast and fell to the ground.

The HSE found that Falcon Crane Hire failed to investigate a similar incident that happened nine weeks before the incident, when the bolts had failed on the same crane requiring replacement.

The HSE found that the company had an inadequate system to manage the inspection and maintenance of their fleet of cranes. Their process to investigate the underlying cause of components' failings was also lacking.

Mike Wilcock, HSE Head of Operations, commenting on the failure to take appropriate and decisive action after the bolts had failed the first time, said "the company fell far short of its health and safety obligation."

Falcon Crane Hire Ltd was fined £750,000, for breaching Sections 2 and 3 HSWA 1974. This included a 25% discount for the guilty pleas. The company was further ordered to pay costs of £100,000.

Back to contents>

Reported cases of Hand Arm Vibration Syndrome (HAVS) and Carpal Tunnel Syndrome (CTS) result in £200,000 fine for a pipe manufacturer

Newport Crown Court heard that employees of Asset International Limited used vibrating tools without proper training or practical controls to reduce vibration risk. There was insufficient risk assessment and health surveillance.

Asset International Limited was fined £200,000 and ordered to pay costs of £27,724 after pleading guilty to offences under Regulations 5, 6, 7 and 8 of the Control of Vibration at Work Regulations 2005.

HSE inspector Joanne Carter said after the hearing: "The serious and irreversible risks from Hand Arm Vibration Syndrome caused by work with vibrating tools are well known and guidance has been in place since the early 1990s. This case shows there is no excuse for not putting in place a management system which includes risk assessment, control measures, health surveillance and information and training to reduce these risks to as low a level as is reasonably practicable."

Back to contents>

Chemical company fined £200,000 when a toxic chemical was ejected under pressure

Leeds Crown Court heard how an engineer unintentionally opened a valve on top of a tanker at Syngenta Ltd's Huddersfield plant. This caused the release of 3.5-3.8 tonnes of paraquat dichloride solution, a deadly type of weed-killer.

Fortunately no one was harmed, but the Court was told how inhaling only 50 grams of the substance could cause death or serious injury. The substance could have spread across the site to road users had the wind been blowing in a different direction.

Syngenta Ltd admitted failing to ensure that work equipment was maintained in an efficient state and failing to take all measures necessary to prevent a major accident.

Syngenta Ltd pleaded guilty to breaching Regulation 4 of the Control of Major Accident Hazards Regulations 1999 and Regulation 5(1) of the Provision and Use of Work Equipment Regulations 1998 and fined £200 000 plus costs of £13,041.

Back to contents>

North West NHS Foundation Trust fined £100,000 for inappropriate bedrail management

During a HSE visit to the Trust in February 2012 issues were identified with the Trust's management of bedrails. On a subsequent visit in May 2012 the Trust was served with an Improvement Notice in relation to bedrail management with various recommendations made, which the Trust failed to implement.

The Trust was inspected on a third occasion in July 2013, but inappropriate bedrails were still found to be in place along with inadequate management systems. A further Improvement Notice was served.

The particular issues were the lack of a system to identify and inspect third party bedrails; the lack of planned preventative maintenance on manual beds and bedrails; a lack of an effective system to rectify faults with inappropriate bedrails; lack of provision of appropriate training, and a lack of procedures to audit and monitor the effectiveness of the bedrail management system.

The Trust was eventually prosecuted for breaching Section 3 (1) HSWA 1974. They pleaded guilty at the Carlisle Magistrates' Court, but the case was referred to Carlisle Crown Court for sentencing. The Trust was fined £100,000 and ordered to pay costs of £18,465.

Back to contents>

Round up

CDM Regulations under review

Despite the Construction (Design and Management) Regulations 2015 (CDM) having only come into force on 6 April 2015, they are already under review as part of the government's Cutting Red Tape initiative for house building.

The government sought consultation from 2 December 2015 to 13 January 2016 from those involved in building homes, including developers, planners and trade associations. This call came after the government acknowledged a red tape problem with house building and therefore invited those involved in house building for any comments or grievances.

The government say the review will seek evidence on everything from planning and post planning consents, through to building houses, supply chains and the market. Areas highlighted as burdens to the industry include road infrastructure for new housing developments, environmental or ecology requirements, and regulations affecting provision of utilities. The review may also consider the changes made to CDM and opportunities to further simplify the statutory guidance which supports the Building Regulations.

The review was interested to hear if any legislation derived from EU obligations was being implemented more strictly than required, or "gold-plated". In addition, it will look at the wider issues faced by house builders in meeting the requirements of the law.

The response gathering process closed in January 2016 and the results are expected to be published later in the year.

Back to contents›

Explosives Regulations 2014 (Amendment) Regulations 2016 (ERAR 2016)

ERAR 2016 came into force on 20 April 2016 implementing Directive 2014/28/EU relating to explosives for civil uses.

The directive concerning civil use of explosives is one of nine directives which have been updated, or recast, as part of a package known as the new legislative framework (NLF). The NLF aims to improve market surveillance requirements across a range of products on the single market.

Here are some of the main changes between the requirements in Explosives Regulations 2014 and ERAR 2016:

- clearly defined legal duties for all economic operators (manufacturers or their authorised representatives, importers and distributors) involved in the supply chain
- clearly defined legal duties for Market Surveillance Authorities (MSAs), such as HSE, in terms of their cooperation with other member states
- MSAs can require corrective action to be taken by economic operators, or commensurate with any risk, can require economic operators to withdraw or recall conforming civil use explosives from the market
- civil use explosives placed on the market must now be accompanied by instructions and safety information, in a language which is easily understood by consumers and end-users. In the UK, this information must be in English

- record keeping duties have now been increased – manufacturers (or their authorised representatives) and importers are required to keep a copy of the EU declaration of conformity and technical documentation, in a readable format, at the disposal of the MSA for 10 years
- the revised regulations explicitly bring commercial 'own use' of explosives within the scope of conformity assessment
- non-compliance is now explicitly considered as both administrative (ie no CE mark applied) and safety based
- makes accreditation the key route for Notified Bodies.

The regulations are supported by a suite of overarching and subsector guidance.

Back to contents>

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16221

Tower Bridge House
St Katharine's Way
London E1W 1AA
T +44 20 3060 6000

Temple Circus
Temple Way
Bristol BS1 6LW
T +44 20 3060 6000

11/F Three Exchange Square
8 Connaught Place
Central Hong Kong
T +852 2216 7000

12 Marina Boulevard
#38-04 Marina Bay Financial Centre Tower 3
Singapore 018982
T +65 6422 3000