

Article Summaries

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The Year in Review

James Lee

This article is the journal's Annual Review of key decisions in the field of tort for 2024. This review examines first *Paul v Royal Wolverhampton NHS Trust* [\[2024\] UKSC 1](#); [2024] 2 WLR 417, the major decision on recovery for psychiatric harm in negligence, which divided the UK Supreme Court. Next is a group of cases on the limits of duty of care, which develop the recent trend of emphasising an incremental approach while also contemplating exceptions. Then there is coverage of *Armstead v Royal & Sun Alliance Insurance Company Ltd* [\[2024\] UKSC 6](#); [2024] 2 WLR 632, the latest authority on scope of duty and associated in doctrines concerning 'legal causation'. Finally, the doctrine of vicarious liability is considered, with a contrast between a decision from the Court of Appeal of England and Wales and a recent decision from the High Court of Australia. It is argued that, overall, 2024 was a year of apparent continuity in tort, but with some important evolution of underlying principles.

Is Canada Square an Answer to Never-Ending Liability for Professionals?

Anthony Jones

The author considers the *Canada Square* case in relation to the 'fraud, concealment, and mistake' limitation exception. He explores the Supreme Court's decision as to what amounted to '*deliberate concealment*', and its consideration of what constitutes deliberate commission of a breach of duty under section 32(2) of the Limitation Act 1980. He sets out what he considers to be the unanswered further questions about the peculiar intersection between the field of professional negligence and this section of the Limitation Act, which borrows the language of breach of duty for its own purposes.