



**LAW COMMISSION
OF INDIA**

SEVENTY - FIFTH REPORT

ON

DISCIPLINARY JURISDICTION

UNDER THE ADVOCATES ACT, 1961

October, 1978

GOVERNMENT OF INDIA : MINISTRY OF LAW

D.O. No. F.2(17)/78-L.C.

New Delhi, the 30th October, 1978

My dear,

I forward herewith the Seventy-fifth Report of the Law Commission of India relating to disciplinary jurisdiction under the Advocates Act, 1961.

As mentioned in the first paragraph of the Report, the subject was taken up for consideration by the Law Commission at the instance of the Government.

I place on record my appreciation of the valuable assistance received from Shri P. M. Bakshi, Member-Secretary of the Commission in the preparation of the Report.

With kind regards,

Yours

H. R. KHANNA

Hon'ble Shri Shanti Bhushan,
Minister of Law, Justice & Company Affairs,
New Delhi-110001.

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I. INTRODUCTORY

1. This Report deals with the question whether any amendments are necessary in regard to disciplinary jurisdiction over advocates under the Advocates Act, 1961. The subject has been taken up on a reference received from the Government of India, Ministry of Law, Justice and Company Affairs, Department of Legal Affairs. From the letter¹ addressed by the Secretary to the Department of Legal Affairs to the Member-Secretary of the Commission in this behalf, the material portion is quoted below:—

Scope and Genesis.

"Disciplinary jurisdiction over Advocates was, as you are aware, transferred by the Advocates Act from the High Courts to the Bar Councils. Suggestions have been made from time to time that this jurisdiction is not being properly exercised and that the Bar Councils are taking too lenient a view and that it would be more appropriate if the jurisdiction of the High Courts is "restored" or alternatively, that the Judges have a greater say in the matter of disciplining erring Advocates.

** ** * ** *

I shall, therefore, be grateful if the Commission can go into this question and favour the Government with the benefit of its advice."

2. Before proceeding to consider whether a change in the law is needed, we would like to state at the outset that the present statutory provisions on the subject were evolved after mature reflection, as will be evident from the history of the provisions.² Strong, if not compelling, reasons should exist for recommending a change therein.

History as showing that the Act was evolved after mature reflection.

II. THE PRESENT LAW

3. The present law is contained in the Advocates Act, 1961, Chapter 5, which deals with the conduct of advocates,³ including disciplinary proceedings for misconduct. Briefly, the scheme is as follows. Where, on receipt of a complaint or otherwise, a State Bar Council has reason to believe that any advocate on its roll has been guilty of professional or other misconduct, it shall refer the case for disposal to its disciplinary Committee.⁴ The Disciplinary Committee of a State Bar Council, after giving the advocate concerned and the Advocate-General an opportunity of being heard, may make any of the following orders, namely:⁵—

Present law—State Bar Councils.

- (a) dismiss the complaint or, where the proceedings were initiated at the instance of the State Bar Council, direct that the proceedings be filed;
- (b) reprimand the advocate;
- (c) suspend the advocate from practice for such period as it may deem fit;
- (d) remove the name of the advocate from the State roll of advocates.

¹ D.O.No. F., 8 (12) /76 -L.C., dated the 4th October, 1978 addressed by the Secretary, Department of Legal Affairs to the Member-Secretary, Law Commission of India.

² Para 7-11, *infra*.

³ Sections 35-44, Advocates Act, 1961.

⁴ Section 33 (1).

⁵ Section 35(3) (a) to (d).

Bar Council of
India.

4. In the case of an advocate whose name is not entered on any State roll, the Bar Council of India, on receipt of a complaint or otherwise, if it has reason to believe that the advocate has been guilty of professional or other misconduct, shall refer the case for disposal to its disciplinary committee.¹ The disciplinary committee of the Bar Council of India has also power to withdraw for inquiry before itself and dispose of any proceedings for disciplinary action pending against any advocate before the Disciplinary Committee of any State Bar Council.² The powers and procedure of the Disciplinary Committee of the Bar Council of India in an inquiry are the same as those of the Bar Council of a State.³

5. Any person aggrieved by an order of the Disciplinary Committee of the State Bar Council may prefer an appeal to the Bar Council of India and a similar right is given to the Advocate-General of the State by an amendment made in 1973.⁴ Such appeal is heard by the Disciplinary Committee of the Bar Council of India, which may, on such appeal, pass such order, including an order varying the punishment awarded by the Disciplinary Committee of the State Bar Council as it deems fit.⁵ But this is subject to the proviso that the order of the Disciplinary Committee of the State Bar Council shall not be varied so as to prejudicially affect the person aggrieved, without giving him a reasonable opportunity of being heard.⁶

6. Any person aggrieved by an order made by the Disciplinary Committee of the Bar Council of India may appeal to the Supreme Court. A similar right is given to the Attorney General of India or the Advocate-General of the State concerned, as the case may be, by an amendment made in 1973.⁷ On such appeal the Supreme Court may pass such order, including an order varying the punishment awarded by the Disciplinary Committee of the Bar Council of India, as it deems fit, but no order of the Disciplinary Committee of the Bar Council of India shall be varied so as to prejudicially affect the person aggrieved, without giving him a reasonable opportunity of being heard.⁸ The rest of the provisions in the chapter are not material for the present purpose.

III. HISTORY

History—Act of
1879.

7. So much as regards the present law. Before the passing of the Advocates Act, 1961, the law on the subject was to be found principally in two enactments. The Legal Practitioners Act, 1879 empowered a High Court⁹ to make rules governing the admission and discipline of pleaders who practised in the courts subordinate to it and before revenue officers and tribunals within its territorial jurisdiction.

Under that Act, the High Court could suspend or dismiss a pleader for taking instructions from a party, or the servant, friend or relative of a party who had not retained him, or for attempting to secure employment through a tout or other person remunerated for the service, or for offering part of his fee as a reward for having

¹. Section 36 (1).

². Section 36 (2).

³. Section 36 (3), and 36 (4).

⁴. Section 37 (1).

⁵. Section 37 (2), main paragraph.

⁶. Section 37 (2), proviso.

⁷. Section 38 (1), main paragraph—earlier half.

⁸. Section 38, main Paragraph, latter half and proviso.

⁹. Sections 6 and 7, Legal Practitioners Act, 1879 (18 of 1879).

procured employment, or for fraudulent or grossly improper professional conduct,¹ or on conviction of a criminal offence implying such a defect of character as to render him unfit for pleadership.²

The inquiry could be initiated by the subordinate court³ in relation to whose proceedings misconduct was alleged to have been committed, and the district court or the Collector could suspend the pleader during his investigation, but the final order was to be passed by the High Court.

8. The Act of 1879 was concerned with pleaders. The Indian Bar Councils Act, 1926 gave to Advocates, who were entitled as of right to practise in a High Court, a measure of autonomy not enjoyed by pleaders. The Bar Council constituted under the Act was a body corporate⁴ composed of⁵ the Advocate-General of the State four members nominated by the High Court and ten members elected by the advocates from among themselves. Act of 1926.

Under the Act of 1926, a complaint of misconduct against an advocate, if presented to a High Court, could be heard, after consultation with the Bar Council, by a district judge; alternatively, the Chief Justice could appoint a tribunal of from three to five members of the council. The finding had to be reported to the High Court, which, after giving the Advocate-General and the advocate concerned the opportunity to be heard, would pass final orders. If the complaint was not dismissed, the advocate might be reprimanded, suspended or struck off the roll of advocates maintained by the Bar Council.⁶

9. Soon after independence, a distinguished Committee was entrusted with the work of reporting on the need for an All India Bar. The Committee gave its Report in 1953. It recommended, *inter alia*, the grant of complete autonomy to the bar. All India Bar Committee.

The observations of that Committee as to the need for autonomy are as follows:⁷

"The medical men have their General Medical Council under the Indian Medical Councils Act, 1933 (Act XXVII of 1933). So have the Chartered Accountants under the Chartered Accountants Act, 1949 (Act XXXVIII of 1949). It is a truism that responsibility thrown upon a person stimulates his sense of responsibility. Unless responsibility is conferred on the representative body elected by the Members of the Bar the establishment of an All India Bar will be meaningless. If it is desirable, as the Committee thinks it is, that the national Bar of India should be a strong and independent body capable of influencing and leading public opinion there should be some competent authority deriving its jurisdiction and power from the Bar itself and not subservient to any external authority howsoever high and eminent that might be. The risk of the Bar Councils being swayed by external influence or unworthy considerations is not, however, as unprovided for as is apprehended."

10. The need for carrying out the recommendation of the All India Bar Committee was stressed in these words in the 14th Report of Law Commission's view in the 14th Report.

¹ Section 13, Legal Practitioners Act, 1879.

² Section 12, Legal Practitioners Act, 1879.

³ Section 14, Legal Practitioners Act, 1879.

⁴ Section 3 (2), Indian Bar Councils Act (38 of 1926).

⁵ Section 4 (1), Indian Bar Councils Act (38 of 1926).

⁶ Section 10, Indian Bar Councils Act, 1926.

⁷ All India Bar Committee Report (1953), page 37, para 90.

the Law Commission of India in its Report on the Reform of Judicial Administration forwarded in 1958¹:—

“47. The All India Bar Committee considered exhaustively the questions of the constitution and powers of the State Bar Councils and the All India Bar Council and made detailed recommendations. In framing its recommendations the Committee accepted the principle that the Bar should be autonomous in matters relating to the profession. Its recommendations in regard to the constitution of the Bar Councils are based on the acceptance of this principle. While recommending that the State Bar Council and the All India Bar Council shall *inter alia* consist of two Judges of the High Court or two Judges of the Supreme Court nominated by the Chief Justice of the High Court or the Chief Justice of India respectively, care was taken to ensure that the two Judges so nominated would be persons who had been advocates, so that, notwithstanding Judges being members, the Councils still retained their domestic character and were composed exclusively of advocates.”

“48. We wish to emphasize the principle of autonomy thus sought to be given effect to by the Committee. Our considered opinion is definitely against Judges who have never been advocates being brought into these autonomous bodies that should consist wholly of members of the profession. In this connection it may be noticed that section 4 of the Bar Councils Act, which prescribes the composition of the Bar Council provides for four persons to be nominated by the High Court, of whom not more than two may be Judges of that Court. The recommendation of the Committee that the Judges nominated should have been persons who had been advocates was, it appears, made deliberately with a view to prevent Judges who had not been advocates from becoming members of the Council. It may be pointed out that, notwithstanding the provision in section 4(1)(b) of the Bar Councils Act, in some of the States, the High Court has not chosen to nominate Judges as members of the Bar Councils. In spite of the absence of Judges on these councils, so far as we are aware, there has been no complaint about the satisfactory functioning of these Bar Councils.

“It would, therefore, appear that the time has arrived for making these professional bodies entirely autonomous. If, however, Judges have to form part of the composition of these bodies, they should be Advocate-Judges.”

Advocates Act,
1961.

11. In 1961, the recommendations of the All India Bar Committee were given legislative effect² by the Advocates Act, 1961, which contains the present law on the subject. We have already summarised its material provisions.³

IV. AMENDMENT NOT NECESSARY

Restoration of High
Court's jurisdiction
not favoured.

12. The brief historical survey given above⁴ shows that the trend of legislation in India has been gradually towards greater autonomy in the field of disciplinary proceedings against members of the legal profession. *Prima facie*, it would be a retrograde step if this trend is reversed and disciplinary jurisdiction is sought to be restored to the High Courts.

¹ 14th Report Vol. I, page 576 Chapter 26, paragraphs 47, 48.

² Sections 34—42 Advocates Act, 1961.

³ Para 3—6 *supra*.

⁴ Para 7—11. *supra*.

If there have been a few isolated instances in which the aggrieved parties are dissatisfied with the action taken by the disciplinary body, that should not be regarded as constituting adequate justification for a change in the law. Such dissatisfaction, assuming that it is justified on the merits of the case, does not necessarily disclose a defect in the machinery of adjudication. However perfect a law, occasions are bound to arise from time to time where the parties concerned may not be totally satisfied with the exercise of powers vested thereunder. The Advocates Act, 1961 has provided machinery for taking the matter to higher authorities in appropriate cases,¹ and obvious cases of injustice could be adequately remedied under the present scheme. The right of final appeal to the Supreme Court ensures that the Supreme Court is not divested of all powers for ensuring high standards of professional integrity. The Supreme Court can, in appropriate cases, pass such order as may be called for. In the absence of cogent reasons supported by adequate factual material, necessitating a modification in the present scheme, we do not consider it proper to disturb it.

13. Reversion to the previous position is therefore out of question. As an alternative to restoration of the old position, it has been suggested² that while retaining the present system, judges should be associated in some form or other with the disciplinary council. We have not been impressed by this alternative either. If the complaint is that the tribunals as constituted at present sometimes take an unduly lenient view, this possibility could not be totally eliminated even if the other alternative is accepted. The fact that the Attorney General or the Advocate General concerned has been authorised to file appeal in appropriate cases to the Supreme Court should also obviate the supposed apprehension. Apart from that, however, such a change in the present system would, in effect, amount to dilution of the autonomy of the bar and a reversal of the progressive trend of legislation to which we have made a reference.³

Association of judges with disciplinary proceedings not favoured.

The Judges of the High Court would generally be reluctant to be associated with the Disciplinary Committee of the State Bar Council, because appeal against the orders of the State Disciplinary Committee would lie to the Disciplinary Committee of the Bar Council of India. The question of association of Judges of the Supreme Court with the Disciplinary Committee of the Bar Council of India does not arise, because appeal from the order of that Disciplinary Committee lies to the Supreme Court.

V. POSITION IN ENGLAND

14. It may be of interest to know that in England, disciplinary jurisdiction over members of the bar is exercised by an autonomous body. Benchers of the Inns of Court have retained throughout their history the exclusive right of "calling" students to the bar and of "disbarring" those of their members whom they find guilty of professional misconduct.^{4,5}

Position in England &

15. The discipline of solicitors in England is in the hands of the disciplinary committee formed by the Master of the Rolls from the members of the council of the society. The committee has the power to strike off a solicitor from the rolls,⁶ suspend him from practice or impose a fine upto 500 pounds. There is an appeal to the High Court.⁷

Solicitors in England.

¹. Para 5-6, *supra* section 38, Advocates Act, 1961.

². Para 1, *supra*.

³. Para 12, *supra*.

⁴. Redcliff and Cross, *The English Legal System* (1971), Page 392.

⁵. For details, see Appendix 1.

⁶. Solicitors Act, 1957, sections 46 and 48.

⁷. Wilson, *Cases and Materials from the English Legal system* (1973) page 141.

VI. ANALAGOUS LAWS IN INDIA

Position under analogous laws relating to other professions in India.

16. We may state that we have also gone through several Indian statutory precedents relating to disciplinary jurisdiction over members of other learned professions. Most of these provisions vest such jurisdiction in autonomous bodies consisting of members of the profession. We give in an Appendix¹ the gist of relevant provisions in some of the Acts, prepared in the form of a chart for convenience of comparison.

Bombay Medical Act, 1912.

17. In this context, we may also refer to local legislation as to the medical profession which illustrates the acceptance by the Legislature of the principle of autonomy. Registration of qualified practitioners in western medicine began in the erst-while State of Bombay with the enactment of the Bombay Medical Act, 1912.

Other Provinces had similar legislation on the same subject. The Bombay Act as now in force provide for a medical council, consisting of five nominees of the State Government, three persons elected by members of the Faculties of Medicine of the Universities in the State and the governing body of the College of Physicians and Surgeons, Bombay, and six elected by registered medical practitioners.²

The Bombay Medical Council constituted under the Act can remove a practitioner's name from the register, after inquiry, for misconduct.³

VII. CONCLUSION

Conclusion reiterated.

18. Having regard to the position discussed above we re-iterate our conclusion⁴ that a change in the law is uncalled for.

Importance of maintaining high professional standards.

19. We believe that we have taken into account all considerations relevant to the question referred to us. What we have said is not intended to detract from the importance of maintaining high ethical standards in the legal profession—or, for that matter, in any other learned profession. Indian tradition expects men and women to discharge their duty to the best of their ability in the field of life which they have chosen for themselves. In the Mahabharata, a lofty ethical passion flavours the definition of 'dharma' given by the merchant Tuladhara to the ascetic Jajali⁵:—

*Sarvesam yah suhrt nityam sarvesam ca hite ratah;
Karmasa manasa vaca sa dharmam veda Jajale—*

'He knows dharma, O Jajali, who is always the friend of all, and who, through his actions, thought and speech, is absorbed in (ensuring) the welfare of all'.

Bacon's view.

20. In the West, similar sentiments were expressed by Bacon in language which, while appearing slightly unfamiliar to us because of the passage of centuries, bears quotation.

In fine Elizabethan language, Francis Bacon begins his preface to his *Maxims of the Law*⁶—

"I hold every man a debtor to his profession; from which, as men of course do seek to receive countenance and

¹ See Appendix 2.

² Section 3 (2). Bombay Medical Act, 1912, (6 of 1 1912).

³ Section 9, Bombay Medical Act, 1912 (6 of 1912).

⁴ Para 12-13 *supra*.

⁵ Mahabharata, Santi Parva, 254-9 (Bhandarkar Oriental Research Institute Edition), quoted by Swami Ranganathananda, *Eternal Values in a Changing Society* (1971), page 537.

⁶ Bacon, Preface to *Maxims of the Law*, quoted by Sir Owen Dixon, "Professional Conduct" (Inaugural Lecture to the Law Students of the University of Melbourne in 1953). *The Jestling*, Pilate, 129-134.

profit, so ought they of duty to endeavour themselves, by way of amends, to be a help and ornament thereunto. This is performed in some degree by the honest and liberal practice of a "profession, when men shall carry a respect not to descend into any course that is corrupt and unworthy thereof, and preserve themselves free from the abuses wherewith the same profession is noted to be infected; but much more in this performed if a man be able to visit and strengthen the roots and foundation of the science itself; thereby not only gracing it in reputation and dignity but also amplifying it in perfection and substance."

H. R. KhannaChairman
S. N. ShankarMember
T. S. Krishnamoorthy IyerMember
P. M. BakshiMember-Secretary

Dated, New Delhi,
the 30th October, 1978.

APPENDIX 1

DISCIPLINARY JURISDICTION IN ENGLAND OVER MEMBERS OF THE BAR.

Disciplinary function
of Inns of Court
and Senate.

In England, admission of a person as a student (of law) and, when he is qualified, as a barrister, is still the responsibility of the Inns of Court. The Inns of Court are also responsible for the maintenance of discipline and for the observance by the barristers of the rules of professional conduct and etiquette. The Inns have delegated the exercise of a number of their powers. For example, their responsibilities in regard to the education and the examination of bar students have been delegated to a council of legal education. In 1967, the Inns delegated their disciplinary power to a "Senate" of the four Inns, which also has wide administrative responsibilities in relation to the bar.^{1,2}

Halsbury states the position as to disciplinary jurisdiction in detail³ as follows:—

"The disciplinary powers of the four Inns of Court, other than those relating to the domestic affairs of the Inns, have been delegated by the benches to the Senate of the Four Inns of Court.⁴ Complaints of professional misconduct or of conduct unbecoming a barrister which may be made against a barrister are received by the Senate from the Bar Council or other bodies or individuals, and are considered by the Complaints Committee of the Senate.⁵"

"In respect of any complaint the committee may decide that no disciplinary action be taken or that the complaint be reported to the treasurer of the Inn of the barrister concerned, or that it shall form the subject matter either of a charge or charges before the Senate Disciplinary Committee,⁶ which may include a judge of the Supreme Court but otherwise consists of practising barristers who are members of the Senate.⁷ When sitting as a tribunal, the Disciplinary Committee consists of not more than seven members and not less than five members.⁸"

Where any case is reported to the Disciplinary Committee, the Complaints Committee is responsible, with the concurrence of the barrister's Inn, for the appointment of counsel to formulate the charge or charges and to present the case before the Disciplinary Committee.

"The sentences which may be imposed by the Disciplinary Committee are disbarment, suspension, either conditionally or otherwise, an order to repay or forego fees, or a reprimand⁹. The sentence, if

¹. Wilson, *Cases and Materials from the English legal system* (1973), page 18.

². See *Re. S. (a barrister)* (1969), 1 All E.R. 949, where the jurisdiction is fully set out.

³. Halsbury, 4th Edition, Vol. 3, pages 616, 616, para 1134.

⁴. Regulations of the Senate of the Four Inns of Court (1970-71) reg. 13.

⁵. Standing orders of the Senate Complaints Committee (1967) ord. 4.

⁶. Standing Orders of the Senate Complaints Committee (1967), ord. 5.

⁷. Regulations of the Senate of the Four Inns of Court (1970-71) reg. 13 (b); Annual Statement of the General Council of the Bar (1966), page 42.

⁸. Standing Orders of the Disciplinary Committee of the Senate (1971), ord. 1.

⁹. Standing orders of the Disciplinary Committee of the Senate Ord. 10.

any, must be notified by the president of the Senate to the treasurer of the Inn of the barrister concerned and the Inn must give effect to it in accordance with such direction, if any, as may be given by the Senate.¹ In those cases where a sentence of disbarment or suspension is ordered, the charges, finding and sentence are published by the barrister's Inn. In other cases, publication is made if the barrister concerned so requests or if the president of the senate so recommends. Where the charge or charges are dismissed, the charges and findings are not published unless the barrister so requests.²

"The decision of the Disciplinary Committee is subject to an appeal to the Lord Chancellor and the judges of the High Court of Justice sitting as a domestic tribunal.³ The judges when sitting in this capacity are described as 'visitors'."

¹. Regulations of the Senate of the Four Inns of Court (1969), reg. 14.

². Standing Orders of the Disciplinary Committee of the Senate (1971), ord. II.

³. Annual Statement of the Senate (1966-67), page 7.

APPENDIX 2

**CERTAIN STATUTORY PRECEDENTS AS TO DISCIPLINARY
JURISDICTION OVER MEMBERS OF THE LEARNED
PROFESSIONS.**

Name of Act	Section	Disciplinary body	Power to impose punishment	Appeal
The Dentists Act, 1948	41	The State Council.	By the State Council.	Appeal to the State Government.
The Pharmacy Act, 1948.	36	Executive Committee.	Order made by Executive Council is subject to confirmation by the State Council.	Appeal from order of State Council to State Government which shall be final.
The Chartered Accountants Act, 1949	21 (4) (a) and 22A.	Council of the Institute of Chartered Accountants.	(1) Reprimand of the member.	Appeal to the High Court.
	21 (4) (b) and 22 A.		(2) Removal of name from Register for a period not exceeding five year	Appeal to the High Court.
	21 (4), Proviso, and 21 (6).	Council of the Institute of Chartered Accountants.	If removal is to be for 5 years or permanent, the case to be forwarded to the High Court.	Appeal to the High Court.
Indian Medical Council Act, 1956.	24 (1)	Medical Council of India.	Removal of a person's name from the Indian Medical Register can be ordered by Medical Council of India, if his name has been removed from a State Medical Register under the State law for registration of medical practitioners.	Appeal lies to Central Government from removal from the State Medical Register on ground of professional misconduct section 24 (2).
Notaries Act, 1952.	10 (d)	The Government.	Removal for professional or other misconduct after prescribed inquiry.	No appeal.
Cost and Works accountants Act, 1959.	20, 21.	Council of the Institute.	Substantially the same as in the case of Chartered Accountants.	Substantially the same as in the case of Chartered Accountants.
Indian Medicine Central Council Act, 1970.	26,27.	Central Council of Indian Medicine.	To remove name from register by the Central Council.	Appeal lies to the Central Government [S. 27 (2)] where any person's name has been removed from a state Register on any ground other than that he is not possessed of the requisite medical qualifications.
The Architects Act, 1972.	29	Council.	By the Council	No provisions as to appeal.