

LEGAL RESEARCH IN SINGAPORE: A CONSPECTUS AND DEVELOPMENT PROPOSAL*

The purpose of this brief exercise is to render a stock taking of the state of the art of legal research in Singapore and to evaluate its contributions to the development of an indigenous and self-sustaining Singaporean legal system which while having a common law basis, is nevertheless not a mere pale shadow of its English parent system. It is made on an analogous assumption as exists in the area of economic and political development theories.¹ Development is not a process limited to economic development, although most energies are directed towards it. Inherently vital also are social and political development which parallel it. The use of law and its relationship to development² is clearly delineated when one considers its limited conventional roles, *viz.* dispute settlement mechanisms and its wider role in developing societies where law functions as an instrument to induce social change not merely to restrain deviant behaviour. In this context then, the state and development of the legal infrastructure is critical. In terms of legal research and development this process may be translated thus:—

“A legal system, however, may for all practical purposes be regarded as autochthonous whenever it has had a sufficiently long period of independent development to become homogenous. Whatever has been borrowed, imposed or received, whatever there was before the borrowing imposition or reception, the process of building up a legal system is the process of blending together the components into a coherent homogenous system which will of necessity differ in many cases substantially from any of its components.”³

* I must gratefully acknowledge Professor G.W. Bartholomew's provocations in causing the crystallisation of my views, over several years of informal unstructured discussion. His preference for the development of basic legal tools, has made it necessary for me to develop the case for concurrent socio-legal research. My thanks also to Miss Carol Wee of the Law Library, University of Singapore.

¹ See Unger, “Law and the Forms of Society” in *Law in Modern Society* (1976) p. 48 *et. seq.* and L. Friedman, “Legal Culture and Social Development” in Friedman & MacCaulay, *Law and Behavioural Sciences* (1969).

² The contrasting description of the conditions of ‘soft development’ illustrates by negative example the role of law: G. Myrdal, “The ‘Soft State’ in Underdeveloped Countries” (1968) 15 U.C.L.A.L.R. 1118 “a general lack of social discipline in underdeveloped countries, signified by many weaknesses: deficiency in their legislation and in particular, in law observance and enforcement; lack of obedience to rules and directions handed down to public officials on various levels; frequent collusion of these officials with powerful persons or groups of persons whose conduct they should regulate; and, at bottom, a general inclination of people in all strata to resist public controls and their implementation. Also within the concept of a soft state in corruption, a phenomenon which seems to be generally on the increase in underdeveloped countries” at p. 1120.

³ G.W. Bartholomew, “The Singapore Legal System” Chap. 5 of R. Hassan (ed.), *Singapore: Society in Transition* (1976) p. 98.

Of course the Singapore blend, if current conditions indicate anything, would incorporate and reflect a common law tradition with legal flavours from Chinese, Malay *adat* and Islam, and Indian cultures, together with a highly urbanised twentieth century commercial and financial climate.

It is assumed for the moment, that this process of indigenous development, particularly a common law one, is fundamentally premised on legal literature of a particular nature:

“It is only when legal writers, thinking about the system as a whole attempt to expound it as a whole, that a coherent and integrated system can begin to emerge, it is only then that the law will become a system and not just a collection of bits and pieces borrowed from various places.”⁴

The demands of a developing country on its lawyers, academic practising and judicial, are far greater than those made by contemporary developed societies or by those societies where economic and social development is more gradual. In the Singapore context, the social and economic development experience is directed towards telescoping the development process, by immediate linkage to the developed economies through multinational and foreign direct investment in Singapore. It is intended to attain self-sustaining development by the turn of the century, and thus achieving in thirty years what took the West the whole century of the industrial revolution. To contribute effectively to this development process, it is insufficient for lawyers to content themselves with what their counterparts elsewhere are doing. For at one and the same time, it is necessary to provide the skills and services which are expected of lawyers, *viz.* lawyers competent in litigation, counselling and government legal work, and the law school to produce such lawyers. Concurrently, the basic working tools of the profession, the reports and law finding tools have to be produced. It is also necessary to study law in action, to test the assumptions commonly made in using law as an instrument towards development.⁵

The methodology of this study will be along the following lines. The basic needs for the development of a Singapore legal literature will be identified and against this model I will superimpose the record thus far achieved. This will serve to identify the gaps in the infrastructure. I shall also attempt to explain the reasons for the uneven development for therein are to be found some of the solutions that can be attempted. I shall outline my development proposals in the context of achievable goals by the Law Faculty. This focus is used as it is the only institution involved in legal research that exists in Singapore which can and should be concerned not only with the day to day workings of the legal system but with its wider and long term issues.

SUMMARY OF DEVELOPMENT PROPOSALS

If one were to plot a programme of development of legal literature one would perhaps begin with the tools of basic law finding which makes the study and practice of law in a common law system coherent.

⁴ *Ibid.*, p. 108.

⁵ See generally Friedman, “The Role of Law and the Function of the Lawyer in the Developing Countries” (1963), 17 Vand. L.R. 181, and Hager, “The Role of Lawyers in Developing Countries” (1972) 58 A.B.A.J. 33.

This would encompass legal material in both legislation and law reports and an efficient retrieval system. Secondly, one would require commentaries, casebooks, surveys, detailed analysis of problem areas, and case and legislation critiques. The financial and commercial centre activities of Singapore in turn demand sustained study of the skills and law of transnational activities and multinational companies but also an awareness of comparative law and legal systems of Southeast Asia. It is here that the pressure to be in the forefront of commercial legal development is most acute. Finally, it would be necessary to evaluate the implications and impact of legal instruments and received law on an urbanised Asian society, if we are to understand the processes, limitations of and relationship between law and development. Such non-doctrinal research has of necessity to be inter-disciplinary.

Law Finding Tools

A programme of development and publication of the tools of legal research should be undertaken by the Law Library, Law Faculty and the Malayan Law Journal, to produce the law finding tools. Here the Law Faculty's role is confined to initiating, funding and coordinating the research projects.

1. Tables of subsidiary legislation.
2. Tables of English statutes and proclamations in force in Singapore.
3. Singapore treaties.
4. Subject index to statutes.
5. A case law citator.

Law Teaching Aids

A priority programme by the Law Faculty to encourage its staff to produce the following:

1. Production and publication of casebook/sourcebook in areas currently absent, specifically land law, family law and conflict of laws.
2. Publication of the *Singapore Law Series* in evidence and procedure, revenue law, conflict of laws, administrative law, commercial transaction, insurance, labour law, legal history and foreign investment law.
3. Collaboration in publishing Singapore editions of established textbooks or commentaries.

Transnational Legal Skills and Comparative Law

To employ staff and encourage the development of such skills by:

1. Development of expertise, literature and workshops on international business transactions.
2. Development of expertise and literature on comparative law.

Socio-legal Studies

To employ staff and encourage its development by the development of expertise and literature on socio-legal research particularly in the area of public housing, population control and state enterprise.

BASIC LAW-FINDING TOOLS

A common law system is critically dependent on the existence of case reports and law finding tools and in some jurisdictions the volume of case materials threatens to make it unworkable but for the timely technological development of the computer which makes retrieval of data simple. In the absence of a computerised system, the traditional system relies heavily on case reports and finding tools. The position in relation to the quality of judicial creativity in law-making still attests to the following features observed sometime ago:

“Despite the administration of the common law in Malaya for nearly two centuries, the volume of reported cases is still rather small. Such reports as there are show an overwhelming pre-occupation by judges with issues of fact and a slavish regard for English authorities. Arguments about points of substantive law are rudimentary and seldom any awareness of the idea that the law being administered is part of a Malayan social machine. The reports are choked with procedural wrangles.”⁶

Some of the reasons that account for uncreative judicial decisions lie in the very small High Court Bench in Singapore which averages six judges.⁷ An overworked bench is unlikely to write judgments unless prompted by appeals. In this instance the trial of the system of judicial clerkships as is common in the United States, whereby young graduates research for judges and are involved in the preliminary stages of drafting judgments, bears some investigation.⁸ Perhaps also, technological changes in the form of a system of stenotypists would free judges from the current burden of tedious handwriting of evidence and arguments, which must in no small way create an aversion to writing judgments!

The system of law reporting leaves much to be desired. All written High Court, Court of Appeal and Privy Council decisions are duly reported in the Malayan Law Journal, which relies too heavily on written judgments sent to them by the judge’s secretaries. Numerous significant decisions and rulings are made in these courts and by the Registrar both in open court and in chambers. The absence of a core of law reporters employed by the Journal leads to the non-publication of such rulings which sometimes appears buried under sensational newspaper reports of cases. The Singapore Straits Times reports of cases are pathetically useless. The tendency is to report

⁶ Calvert, Coomaraswamy and Sheridan, “Problems of Legal Education in Malaya” (1960) 2 Me Justice 11.

⁷ This is evidenced by two separate phenomena: firstly the increasing of the jurisdiction of the subordinate courts thereby transferring the case load away from the High Court, see Subordinate Courts Act (Cap. 14). Secondly the appointment of Judicial Commissioners with the same powers but without security of tenure, as is proposed by the Constitution (Amendment) Act 1979.

⁸ See R. Fabrikant and H. Morais, “Judicial Clerkship: A Proposal” [1971] 1 M.L.J. lx.

cases of wider interest with an emphasis on the trivial. Reporters who are non-legally trained are used for this purpose. In marked contrast the Malaysian New Straits Times Law Reports contains regular lucid and legally sound reporting, presumably by legally trained reporters or editors and serves a useful source for otherwise lost decisions. This would be a useful source of current law reporting particularly of lower court decisions. Secondly, the increased jurisdiction of the District Court leads to significant cases being heard at that level. Although the decisions have no weight as precedents, they represent a significant body of Singapore case law, but again, are nowhere reported unless they are on appeal to a higher court.

In both legislation and case reporting, I have confined myself to the minimum requirements for a working system. Luxuries like commentaries on statutes like *Halsbury's Statutes of England*, or noter-up of cases or legislation or specialised commentaries on the Companies Act would be embellishments however desirable they may be. From a practice viewpoint both Mallal's commentaries on the *Supreme Court Practice* (1961) now the Rules of Supreme Court 1970 and the *Criminal Procedure* (1957) long outdated are eminently suited for new editions or entirely new works. The law report tools relating to English case law and legislation are more than adequate and it is not surprising to find some Singapore lawyers' library containing *Halsbury's Laws of England*, the *Current Law Citator* and the *All England Law Reports/ Weekly Law Reports*, series which collection appear to be 'supplemented' by a subscription to the *Singapore Statutes* and perhaps if funds permit the *Malayan Law Journal*!

It has been assumed that a functioning common law system requires the working tools of research which make law finding possible. So long as law finding is tedious and erratic because of the absence of law finding tools, it will result, as it has, in automatic references to English texts and books and the stifling of any possible initiatives towards creativity and the looking at local legal problems within a Singaporean perspective.⁹ In this area, coordination and implementation of the gaps must come from the Law Faculty, Law Library, Malayan Law Journal and perhaps the Attorney General's office.

The following charts serve to identify the existing works as well as the gaps in the area of legislation and case reports and finding tools:

⁹ See Calvert, Coomaraswamy and Sheridan, *op. cit.*

TABLE OF LEGISLATION AND LAW FINDING WORKS AND GAPS

<u>Basic Requirements</u>	<u>Published Works</u>	<u>Published by</u>	<u>Gaps</u>
<p><u>Legislation</u></p> <p>A. Published Statutes and Regulations</p>	<p><i>Singapore Statutes Rev. Ed. 1970 and Annual Supplements; Government Gazette.</i></p>	<p>Attorney General's Chambers.</p>	—
<p>B. Index and Tables to Singapore Statutes</p>	<p><i>Tables of the Written Laws of the Republic of Singapore 1819-1971</i> (with Cumulative Supplements to 1977) containing chronological tables of Straits Settlements Acts and Ordinances and those currently in force; a chronological table showing Singapore Acts and Ordinances passed between 1946 and 1977, showing those still in force; a table of chapter titles showing the 1970 revised edition and annual supplements still in force and a table of reprints issued under the Interpretation Act. Additionally it contains an alphabetical table of unrevoked Acts and Ordinance listing all amending legislation and a table of all unrevoked subsidiary legislation.</p>	<p>Malaya Law Review, Law Faculty, University of Singapore.</p>	—
<p>C. Index and Tables to Singapore Subsidiary Legislation</p>	<p><i>Table of Subsidiary Legislation</i> containing an alphabetical index to all existing statutes as at 1971; a table of subsidiary legislation made under Acts contained in the 1970 Revised of Acts and those omitted from such edition; and a table of subsidiary legislation made under Acts of the 1970 and 1971 Amendment Supplements.</p>	<p>Attorney General's Chambers.</p>	—

<u>Basic Requirements</u>	<u>Published Works</u>	<u>Published by</u>	<u>Gaps</u>
D. Index and Tables to English Acts Applicable to Singapore by Reception Legislation	<i>Tables of Written Laws of the Republic of Singapore 1819-1977</i> (alphabetical table) vol. 1.	Malaya Law Review, Law Faculty, University of Singapore.	Tables of English Acts passed since 1826 which are applicable to Singapore by virtue of the Second and Third Charters of Justice, Tables of English Acts passed since 1826 which are applicable to Singapore by virtue of Imperial legislation of England or under section 5 of the Singapore Civil Law Act (Cap. 30). Tables of Royal Proclamation, Orders-in-Council and Letters Patent issued under the Royal prerogation or under English Acts and extended to Singapore.
E. Treaties Index	Singapore — Treaties Supplement.	Attorney General's Chambers.	Tables of treaties applicable to Singapore by direct application or state succession. This was designed to constitute volume III of the <i>Tables of the Written Laws of the Republic of Singapore</i> .
F. Subject Index to Statutes			A subject matter classification together with a list of relevant statutes, rather than merely the alphabetical indexes, along the lines of <i>Halsbury's Statutes of England</i> .

TABLE OF CASE REPORTS AND LAW FINDING WORKS AND GAPS

<u>Basic Requirements</u>	<u>Published Works</u>	<u>Publisher</u>	<u>Gaps</u>
2. <u>Cases</u>			
A. Reports of Cases of Singapore Courts	Malayan Law Journal ¹⁰ (1932 -- current)	Malayan Law Journal (Pte) Ltd.	---
B. Current Case Reports of Unreported Decisions	---	---	Newspaper or digest reports of district court and other unreported decisions of a usable quality e.g. London Times Law Reports or New Straits Times Law Reports.
C. Digest of Cases	Mallal's Digest (4 Vols. to date)	Malayan Law Journal (Pte) Ltd.	---
D. Case Citator	---	---	An alphabetical and subject classification of cases along lines of the <i>Current Law Citator</i> which in addition to the names and citations of cases reported should contain the history of any case, whether and how it has been since been treated by later cases or statutes. Besides the Digest a researcher now has to plough through individual volumes of M.L.J. since 1965. The Law Library maintains such a card index.

¹⁰ For a full list of Singapore and Malaysian law reports and their contents see B. Mallal, "Law Reporting in Malaya" (1959) 1 Mal. L.R. 71.

The gaps in law finding tools are so significant that they probably account more than anything else, for the slavish use of English materials in legal practice and teaching. The institution best equipped to solving these difficulties is the Law Library of the University of Singapore, which could work with the Attorney-General's Chambers. Publication of these works can easily be undertaken either by the Malayan Law Journal (Pte) Ltd. or the Law Faculty through the Malaya Law Review. What has hitherto accounted for the lack of initiative in this area has possibly been the compartmentalised institutional perceptions as to what each own's primary functions are. Thus the Law Faculty's priorities are in doctrinal and teaching works and the Law Library in maintaining an excellent legal collection. The articulation of the needs by the Faculty, its coordination of research designs and personnel would provide the necessary catalyst.

DOCTRINAL LEGAL WORKS

The literature outlined above, are the basic minimum of a working common law system and even there gaps appear. The problem becomes acute when one surveys the secondary literature. Since most of the output in this area is likely to emanate from the Law Faculty, it is axiomatic that its first priority will be towards teaching needs.

"The need to direct research to teaching is of critical importance in the law schools in developing nations, more than in industrialized nations. The reason is that there is a dearth of textbooks, casebooks and other teaching materials which are locally-oriented. Although the common law forms the basis of the legal system in Singapore and Malaysia, textbooks and casebooks produced for use in common law jurisdictions in more developed nation are inadequate, if not inapplicable, in the large areas governed by statutes and customary law. These have yet to be systematically investigated. Furthermore, if law is to be taught on a "seamless garment" and not as watertight conceptualistic compartments materials will have to be developed."¹¹

I propose here to plot the existing works from the current curriculum of the Law School, taking sourcebooks and casebooks, the *Singapore Law Series* introduction, a textbook or commentary as the basic teaching requirements, omitting law review articles which however useful are of narrow sectional utility for teaching if unaccompanied by basic texts. I shall also list for contrasts the foreign works used.¹²

Purely from a teaching perspective, a casebook and an introductory outline of the area would be the minimum requirements. The outlines of materials available indicate vast gaps which should form the first priority of the Law Faculty's publishing programme. Mimeographed materials in various stages of completion and editing which represent the cumulative legacy of past law teachers abound. They could easily form the basis of collaborative work towards publication for a wider audience than students. After the lapse of about three years in teaching a subject, the production of an introductory outline for the Singapore Law Series should not prove an insurmountable task. The production of textbooks requires further investigation. If competent

¹¹ S.M. Thio, "The Role of Law Schools in the Developing Nations" (1969) 11 Mal. L.R. 250.

¹² See Chart in Appendix 1. For this purpose, I am relying on the course descriptions of the Law Faculty Handbook 1979-80 and the various course syllabuses used for the year 1978-79 for the courses offered in the year.

works¹³ are not forthcoming because of time, finance and the necessary experience, it may prove to be a stop gap measure to produce Singapore editions, not supplements, of established works currently used. The distinction sought to be drawn is as follows: A Singapore supplement will treat Singapore law as an appendage to either an English or Australian work and is thus inadequate. A Singapore edition on the other hand will require substantial revision, excision and addition of local material that while using a foreign form, will have to reflect a different whole. This transplant approach has the merit of time saving as it will telescope the germinating time required to produce such a work from scratch. Some areas are more amenable to this approach than others. Areas which are quite similar to English or Australian law, *e.g.*, contracts, torts, company law, evidence, trusts, banking, shipping, insurance, and commercial transactions, can in varying degrees benefit from such an approach. Other areas *e.g.*, land law, family law and public law are areas where drastic local differences require a totally new work. For casebooks or sourcebooks, it may be sufficient to mimeograph local materials as supplementary to existing English casebooks in some areas, *e.g.*, trusts. This approach would require investigation with existing foreign publishers, authors and their local agents, and if successful, can mean the Faculty producing such textbooks within three years.

TRANSNATIONAL LEGAL LITERATURE AND COMPARATIVE LAW

The third facet of my proposal involves the development of literature designed to reflect the legal needs and issues of a commercial and financial centre. In this area the training of graduates as well as the exchange of skills and ideas in multinational legal work has become an acute issue.¹⁴ There is constantly the suggestion by multinational bankers¹⁵ that the requisite legal skills are unavailable in Singapore and there is thus pressure to allow foreign lawyers to practice in Singapore, as is the case in Hong Kong. Partly in recognition of this issue, the Faculty organised a two-day seminar in 1977 on the law of *International Business Transactions: Some Aspects of Transnational Enterprise Investment in Singapore*, the proceedings of which were published in the 1977 and 1978 issues of the *Malaya Law Review*. Such efforts, while admittedly piecemeal, represent merely a reflection of the possibilities and need for more sustained effort both by the Faculty and more especially by the profession itself.

¹³ Brave souls have rushed to print where more timorous lawyers have feared to tread. See for example A. Singh, *Company Law of Singapore and Malaya* (1976-1978); *Estate Duty, Executorship & Bankruptcy in Singapore & Malaysia* (1975); *Tax Planning & Accounting in Singapore & Malaysia* (1977).

¹⁴ The International Council for Law and Development has organised training sessions for law schools in the area of multinational investment, for South and Southeast Asia: The Pilot Workshop on Transnational Enterprise 1977, Manila; The Workshop on International Investment and Joint Ventures 1978 Jakarta; and the Workshop on International Trade 1979, Colombo.

It is an irony of timing that the Singapore Law Faculty's involvement in this programme has been limited to the participation of this writer, as staff attrition caused the loss of persons who had continuing interest in this area,

¹⁵ See for example *Business Times*, Banking and Finance Supplement 29 April 1979 p. 13.

Legal creativity in the field has the greatest opportunity to find expression, both in the sphere of legal counselling as well as in legal drafting. The constant inter-change between banks, the Inland Revenue Department and the Monetary Authority of Singapore and the legislative changes that follow is an expression of this dynamic. Fascinating legal issues posed by financial centre activities, *e.g.*, the legal status of the receipts issued by banks evidencing holdings of gold by the named bearer, demand creativity both from the private as well as the government lawyer. The involvement of the law researcher in this enterprise, hitherto almost unknown, can lead to the development of legal devices and literature necessary in the financial centre world.

Secondly, Singapore represents a unique host country in its experience with multinational companies, which have almost otherwise universally acquired condemnation and grudging acceptance. Studies into the legal and policy framework under which they operate have and would be of great interest. Multinational legal work will also involve a familiarity of the unique legal problems and issues that are posed by transnational transactions. A need to be aware of the outlines and pitfalls of legal regimes in Southeast Asia, Japan, the European Economic Community and the United States arises as these countries become substantially involved in Singapore's investment and trade sectors and *vice versa*. Comparative law research has not been undertaken in Singapore as younger staff members have shown no interest in the area and no Faculty priority has been identified. Funding for such research has not been the cause of disinterest, as the Institute of Southeast-Asian Studies has been on record, offering funding for any project in this field. Secondly, the Faculty itself has never had on its expatriate staff, until recently, anyone with experience or interest in this area to generate interest therein. The Singapore/Indonesia Universities joint Colloquiums¹⁶ have now developed into an ASEAN wide biennial conference¹⁷ which would catalyse such interest and consequent writing. In the immediate future, the Faculty's role would be to employ comparative and transnational business legal scholars, to ensure continuity and sustained research, with the hope that undergraduate and Faculty interest generated thereby will provide the basis for further development.

¹⁶ The *1st Colloquium on Indonesian Law* held in 1972 at the Singapore Law Faculty considered the following areas: the Indonesian Legal System; Legal Education in Indonesia and Law, Lawyers and Development in Indonesia. The *2nd Colloquium on Indonesian Law* held in 1973 at the Singapore Law Faculty considered the following areas: Company Law and Company Law Reform in Indonesia; Some Aspects of Taxation on Capital Investment in Indonesia; Corporate Tax Planning for Doing Business in Southeast Asia; Future Relations in Investment between Indonesia and Singapore; with Special Reference to International Fiscal Relations and the Possibility of Negotiating Double Taxation Avoidance Agreements or Bilateral Tax Treaties Between Indonesia and Singapore. Issues Pertaining to Taxation of Foreign Investments in Singapore and Negotiation of Selected Provisions of Bilateral Tax Treaties. The *3rd Colloquium on Singapore Law* held in 1973 in Jakarta considered the following areas: Financing Industry and Trade in Singapore; Some Aspects of Business and Consumers Securities in Singapore and Some Aspects of Corporate Financing in Singapore.

¹⁷ Conference on Legal Development in ASEAN Countries, Jakarta 1979.

SOCIO-LEGAL RESEARCH

This is the area of vital importance, wherein every passing year of neglect results in an irretrievable loss of ideal conditions of study of the unique Singapore experience in law and development.¹⁸ The socio-legal research in this area would seek to investigate the following: (i) Research towards the development and application of law to the solution of current problems; (ii) research into law as an instrument of social justice and (iii) research into current problems.¹⁹ This research is non-doctrinal and the skills required to undertake such research are distinct. They involve the following: “(a) it lays a different and lesser emphasis upon doctrine; (b) it seeks answers to broader and more numerous questions; (c) it is not confined exclusively to appellate reports and other traditional legal sources for its data; and (d) it may involve the use of research perspectives, research designs, conceptual frameworks, skills and training not peculiar to law-trained personnel.”²⁰

The Singapore experience in public housing, has been studied from many viewpoints²¹ but the socio-legal implications have been totally neglected. Legislative efforts in the abolition of the jury system, amendments to family law in the Women’s Charter have all been made on assumptions that have not been tested by empirical data. For example, the Women’s Charter has since its inception in 1961 attempted to formalise and institute a civil ceremony of marriage. Behaviour patterns however appear to be unchanged. Couples do not consider themselves ‘married’ after the ceremony and even live apart until the traditional Chinese wedding dinner has been held. The formal civil ceremony is in many cases undertaken to obtain priority for public housing. A review of the course Land Law as currently taught, totally ignores public housing legal issues and is content to focus instead on fast becoming legal history subjects of rent control and landlord and tenant. The Singapore experience in population control and the impact of public housing on family behaviour and its legal implications, is again omitted from the Family Law curriculum although in this case, studies have been made.²² The structure and implications of multinational and government companies find little expression in the Law of Associations course. The workings of a western contract law on Chinese business relationships and conflict avoidance tendencies, find no expression in the Contract course. Other areas of unique importance include environmental control and consumer protection. The only excuse that can be raised is that the curriculum is already over-burdened with doctrinal topics and the current law teachers have no experience in these new areas.

¹⁸ See generally, International Legal Center: *Law and Development: The Future of Law and Development Research (1974)*; *Legal Education in a Changing World (1975)* and the 1975 *Dag Hammarskjold Report on Development and International Cooperation*.

¹⁹ Areas articulated by S.M. Thio, *op. cit.* at p. 258.

²⁰ E. Jones, “Current Trends in Legal Research” (1962) 15 *Journal of Leg. Ed.* 126.

²¹ See for example S. Yeh, *Public Housing in Singapore: A Multi-Disciplinary Study (1979)*.

²² K.S. Wee and R. Hassan, *Law and Population Project (1976)*.

Abortive attempts have been made to resuscitate a project to study the legal profession.²³ Not unexpectedly in the area of criminal law and justice, some work has been conducted.²⁴ The Faculty's first task in this area is to actively recruit lawyers with socio-legal experience with a view to generating interest and expertise in the area. Additionally the possibilities of inter-disciplinary studies with the Sociology department may be explored.

CAUSES OF THE UNEVEN STATE DEVELOPMENT

What then are the factors that have hitherto obstructed a coherent development? It has been an institutional problem. A legal research institute, as advocated along the lines of the Indonesian National Law Development System or the University of the Philippines Law Center would, no doubt with sufficient funds and staff have been able to promote and achieve this coherence.²⁵ This however is unlikely in the near future, both because of problems of financing but more importantly because of the acute shortage of legal researchers. The Attorney General's offices would be where one would expect legislative research initiative to originate but there too an apparent shortage of staff militates against this.²⁶ The Malayan Law Journal's founder, B. Mallal, was instrumental in compiling, writing and publishing not only the law reports and digests which are currently published but also commentaries on criminal and civil procedure and was single-handedly responsible for the fundamental working tools of the legal profession. While Malayan Law Journal (Pte) Ltd. continues to publish legal works, the legal coherence and vision of its founding father is not reflected in its current publications. Thus its early publications were in the area of law reports, digests, and commentaries. Its more recent

²³ Again, the International Council for Law and Development initiated a programme of socio-legal workshops firstly in studies of the legal profession in 1973. At that time the Faculty had staff who had interest and ability to undertake the study, but differences over the mechanics of the project and subsequent loss of staff led to the Singapore project being aborted. An attempt to resuscitate the interest was made in 1978 jointly through a working session with the University of Malaya Law Faculty in Kuala Lumpur. Unhappily this second attempt proved fruitless through the differing interests of the two Faculties involved and the unsuitable selection of sociologist resource persons who were unable to cross disciplinary barriers.

²⁴ See for example M. Cheang, *Jury Trial — The Singapore Experience* (1973) W.A.L.R. "Sentencing Criminals" (1974) 16 Mal. L.R. 204 "Disparity in Sentencing" [1977] M.L.J. T.T.B. Koh "The Sentencing Policy and Practice of Singapore Courts" (1965) 7 Mal. L.R. 291. C. Mohan, *Bail in Singapore* and Postgraduate research, e.g. J.M. Brown, *Sociological Factors Associated with Recidivism in Singapore — Males, Ages 6-21*. (1962). M. Khoo, *The Socio-legal Aspects of Pirate Taxis in Singapore* (1971) and A. Chew, *Secret Societies in Singapore a Legal and Empirical Study* (1977).

²⁵ See K.L. Koh, "Current Legal Research in Singapore" Conference Paper for Conference on Legal Development in ASEAN Countries, Jakarta (1979).

²⁶ It is ironic that a most useful legislative research tool, *Tables of the Written Laws of the Republic of Singapore 1819-1971* and Supplements up to 1977 was produced by E. Srinivasagam, the Law Librarian of the University of Singapore, rather than the Attorney General's Chambers. Vol. I containing chronological tables of legislation, with those in force at various times and currently has been published by the Malaya Law Review, Law Faculty, University of Singapore. Vol. II was to contain a chronological table of subsidiary legislation and Vol III was to contain a chronological table of Indian, English and Straits Settlements legislation applicable in Singapore, as well as its treaties. The possibility of volumes II and III appearing has become remote because of the departure from Singapore of both Miss E. Srinivasagam and Professor G.W. Bartholomew who were initiators of the project.

publications are in the area of Malaysian and Singapore doctrinal areas which appear to be published on the *ad hoc* availability of manuscripts rather than by conscious design within a programme of development.

The Law Faculty of the University of Singapore has made uneven contribution and again this has been partly attributable to a high attrition rate in terms of staffing.²⁷ Even with the limitations of staff, what has been published displays a fractured approach.²⁸ It is submitted that an underlying dilemma exists which creates a great deal of tension which partly explains the uneven output. The socialisation process of its Faculty underlies this problem. A quick glance at the graduate and undergraduate training of local staff of the Law Faculty is instructive.²⁹ Almost without exception, most local staff have been trained either at undergraduate or postgraduate levels at the established law schools of Oxford, Cambridge, London, Harvard and Yale. The above profile indicates that about 80% of local staff obtained their first degrees in Singapore and then proceeded to acquire foreign post-graduate qualifications. This exposure, it is submitted has created a dilemma which expresses itself in the uneven legal literary output of the Faculty.

Having been recruited mostly from the top graduates of the Law School they have been exposed to the academic and literary excellence of established Western law schools. This inevitably creates a challenge and desire to contribute to legal literature of the contemporary western legal world. Secondly, there is the personal achievement of wanting to be published by a reputable foreign legal periodical which enhances one's group esteem and promotion prospects. Both factors serve to create firstly a diffidence to publish anything substantial other than what is the result of a lifetime's deliberations and usually in areas of interest in the western legal world. Counter-balancing this pressure, is the need to write, generated by promotion exercises and teaching interests which results in casenotes and articles, in areas which coincide with one's teaching obligations. It thus becomes an immediately achievable task to produce shorter doctrinal studies which will meet these goals. The more sustained and general works are shelved for later, which because of staff attrition results in indefinite shelving. The socialisation process can be contrasted with the experience of some Indonesian law schools. Here the older Dutch trained staff who predominate encounter difficulties of publication for reasons of language differences, financing and the generally low level of demand for Indonesian language texts because even the student market is almost non-existent as a result of high publishing costs. This results in little publication of legal works of current use in *Bahasa Indonesia* or English.

A glance at article titles written by Singapore Faculty members reflects this phenomenon. It is also interesting to note that the exceptions to this observation have been the staff with longer terms of service, where attempts seem to have been made to produce local

²⁷ See S. Jayakumar, "Twenty One Years of the Faculty of Law, University of Singapore: Reflections of the Dean" (1977) 19 Mal. L.R. 1.

²⁸ *Ibid.* Appendix VIII, page 39 for a list of books, published.

²⁹ See Appendix II. This profile is from P. Pillai, 'Law Teaching in Singapore: Recruitment, Retention and Socialisation' (an unpublished paper, 1976).

legal literature on a sustained basis. This would lead to the qualification of the phenomenon in the following terms: The dilemma appears to find expression critically in the first five years of teaching and if the staff member has not left academia by then, it appears to resolve itself, resulting in substantial local law writing. The diffidence is greatly felt in areas where local law is almost entirely identical to English law, *e.g.* contract and torts.

The existence of excellent textbooks and casebooks emanating from England which are the result of a lifetime's writings and improved over several editions serve to render any attempt to produce such local works a formidable task, which would immediately bear unfavourable comparison. Another reason is that it would be a futile exercise to produce such works where excellent ones exist. This is again reflected in a review of books published by full-time teachers of the Singapore Law Faculty.³⁰ The areas where textbooks and casebooks have emerged are where local law, because of legislative initiatives is sufficiently different to justify the need and indeed the production of such works *e.g.* constitutional law, criminal law, and law, company law, legal history, credit and security and banking. The evident gaps are in contract, torts, equity and trusts, sale of goods, and hire purchase, shipping law, insurance, where this reason is seen to operate most vividly. In other areas like evidence, criminal justice, revenue law and conflict of laws where sufficient divergence justify local writings, other reasons, including the turnover of staff, account for the lack of sustained works.³¹

Another major factor accounting for the uneven contribution is one of academic direction and leadership. The Faculty's total energies have for too long been directed towards the seemingly insurmountable problem of staff recruitment, retention and providing an over-extended undergraduate programme for a large number of students.³² If it is vision that has been in short supply, the diversions more than explain the phenomenon particularly when it was coupled with an atmosphere of low morale and constant staff attrition. The directions the law school should take, have for long been perceived:

"In the next decade or two I have set for myself two objectives. The first objective is to embark upon empirical research within Singapore and Malaysia in order to discover to what degree our imported legal systems have filtered towards the grass root of our societies. As a sequel to this enterprise, it is my hope that law-teachers in this faculty will plant the seeds of a jurisprudence of Singapore and Malaysia. By this I mean that the common law in Singapore and Malaysia will hopefully develop according to the genius and the felt-needs of our two communities and not continue to be tied to the precedent-strings of the English common law.

My second hope is that over the next two decades the law-teachers in this faculty will be interested to learn about the laws and legal systems of the countries of this region. This seems to me a desirable enterprise for two reasons. First, by the logic of our geo-political location. Secondly, in recognition of the fact that increasingly, the business-legal problems are of a regional character.... Looking to the long-term it seems obvious to me that one must aim to produce graduates who are, not only familiar with the legal systems of Malaysia and Singapore, but

³⁰ See Appendix VIII of S. Jayakumar, *op. cit.*

³¹ In the area of revenue law, accountants have produced textbooks, some of which are useful but still inadequate as legal works. *E.g.*, B. Soin, *Singapore Master Tax Guide*, 3rd Ed. (1977) A. Singh, *Tax Law of Singapore* (1976).

³² See Jayakumar, *op. cit.* at page 4 where the full time staff-student ratio of the Law Faculty for 1976 was calculated to be 1:26.8.

also with those of the other ASEAN countries. The first step towards the attainment of that long-term objective is for the law-teachers themselves to learn about the laws and legal systems of our neighbouring countries.³³

To translate the vision into reality, requires firstly its becoming a shared perception, secondly, the mapping out of its detailed implications and thirdly its implementation. It has been an absence of the latter two conditions that has accounted for the failure of the vision to take root. The multiplicity of undirected research and publishing efforts is also in part an expression of this problem.

Postgraduate legal research is usually a prime vehicle to be used to achieve a research development programme. In this case the Law Faculty's achievement has again been unstructured. Firstly in sending its staff members on study and sabbatical leave, the Faculty's legitimate interests have compelled phasing the programmes to its teaching needs. To this end, it has sent its staff abroad to acquire postgraduate experience and exposure in legal areas which would coincide with its undergraduate teaching needs. Other than postgraduate degrees obtained by examination, papers written therefor have been in narrow doctrinal areas. Postgraduate degrees obtained by staff from the University of Singapore which have been sustained studies of a whole system,³⁴ have been doctoral works. The local postgraduate programme reflects predominant Master's degree papers which have confined themselves to narrower areas of law.³⁵

A study of the titles of the theses does not reflect a structured development. They cover a wide area of criminal law and justice, constitutional law family law and commercial law of specialist interests. They probably reflect the pressures of most researchers having held full time employment concurrently as well as the problem of scarcity of local supervisors. The Faculty does not appear to have had research priorities and directed postgraduate research into these areas.³⁶ Faculty undergraduate research papers have been written for various courses from international business transactions, law of international trade, securities regulation, administration of criminal justice, and shipping

³³ Dean T.T.B. Koh, (1973) Law Department Paper (for internal circulation). In pursuance of this, the Law Faculty organised 3 Indonesian/Singapore Law Colloquiums in 1972, 1973 and 1974 with the University of Indonesia, Jakarta. See, *ante*, p. 204 where the areas covered are listed.

³⁴ P.T. Tan's *The Industrial Relations Machinery of Singapore* (unpublished). K.L. Koh's *Credit Facilities and Securities for Development Financing in Singapore*, published as *Credit and Security in Singapore: The Legal Problems of Development Finance* (1973).

³⁵ See Appendix VII of Jayakumar *op. cit.* at page 37 which covers the period 1956-1977. To bring this list up to date it would be necessary to add following works of 1977 and 1978. J.S.B. Foo, *A Study of the law and practice regulating the new issue of equities in Singapore* (LL.M.). M.F. Mahmood, *The Accordance of the Incidence of Tax—the Problem of 'Artificial' or 'Fictitious' Transaction under Section 3 of the Income Tax Act (Cap. 141)*.

³⁶ Another source of developing literature has been of Singapore legal thesis completed at foreign universities. In this category there can be identified to date, which is undoubtedly not a complete list, the following: S.J. Tan, *Foreign Investment Law of Singapore* (Columbia University) 1972. S.K. Phang, *Import Trust Receipts in Victoria and Singapore* (Monash University 1977) and C.Y. Lee, *Consumer Credit and Security Over Personalty: The Law in Singapore* (London University 1978).

law but these vary in quality and are mostly unpublished and uncatalogued.

The Braddell/Tun Abdul Razak Memorial Lectures jointly organised since 1970 by the Singapore and Malaysia bar associations, law faculties and alumni were instituted to generate local legal scholarship. To date the lectures topics which have been delivered on Singapore oriented areas are: Professor A. Ibrahim, *Towards a History of Law in Malaysia and Singapore* (1970); Professor G.W. Bartholomew, *Acts and Deeds* (1971); Justice A. Winslow, *Some Reflections on Advocacy in A Fused Profession* (1972); Mr. A.P. Rajah, *The Role of Law and Lawyers in a Developing Society* (1974) and Mr. David Marshall, *Reform of our Criminal Procedure—Lessons from Comparisons between the Accusatorial and Inquisitorial Systems* (1978). The time constraints, a maximum of two hours for the public delivery of the lecture, and the fact that most of the speakers have been judges and lawyers with busy legal practices has in part contributed to the areas chosen for reflection and analysis.

Finally, the outlines of the Singapore legal system has for too long been unavailable. Besides Braddell's *The Laws of the Straits Settlements: A Commentary* 2nd Edition (1931-1932) and Sheridan's *The British Commonwealth* series (vol. 9) *Malaya and Singapore, The Borneo Territories: The Development of their Laws and Constitution* (1961) there has been no adequate account of the system.³⁷ The Law Faculty has since then instituted the *Singapore Law Series* which is designed to provide an introductory survey of the main areas of Singapore law and which has also attempted to synthesise the various elements of Singapore law.³⁸ While it is intended to be a continuing series, the gaps so far as indicated by what has been published, reveals a similar pattern observed earlier, *i.e.*, works exist where local law is significantly different from English law.

It is not intended by this survey to suggest that the proposed development programme can be achieved immediately. It is made with the observation that the Faculty's staffing problems have turned a corner towards stabilising and that further attrition can be stemmed by academic leadership and direction. It is the intention of the writer to provoke debate and the refinement of research design and direction. It is motivated by an immodest hope to impart some glimpse of the intellectual challenges, possibilities and contributions that can be made by Singapore legal scholars, which are not less but more demanding and satisfying than narrow doctrinal scholarship of peripheral interest to legal scholars in the developed world. Finally it is not intended to be an apology or indeed the justification for mediocre scholarship. For in tandem with Singapore's economic development ambitions, it is excellence that is the target.

³⁷ For a recent attempt, for the Institute of Banking and Finance students, see Myint Soe, *The General Principles of Law* (1978).

³⁸ K.L. Koh (ed.): S. Jayakumar, *Constitutional Law*; K.L. Koh, *Criminal Law*; K.S. Wee, *Family Law*; J.C.K.K. Wong, *Shipping Law*; Myint Soe, *Banks and Banking*; P.N. Pillai, *Legal Framework of Business Organisations*; P.N. Pillai, *Company Law*.

The conclusions of this survey indicate a need to outline the Faculty's priorities in terms of research and to translate this outline through active recruiting policies, training programmes and research finding with a view to achieving within a five year period a working model which can further be enhanced to providing a Law School with a sense of direction and purpose which will actively contribute to legal development in Singapore.

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Appendix I

<u>Courses</u>	<u>Local Casebooks/Sourcebook</u>	<u>Singapore Law Series</u>	<u>Local Textbook/Commentary</u>	<u>Foreign Textbook</u>	<u>Foreign Casebook</u>
<u>Year 1</u>					
Legal Method	Mimeographed Materials	-----	G.W. Bartholomew, <i>The Commercial Law of Malaysia, A Study of the Reception of English Law</i> (1966)	W. Twining and D. Meirs, <i>How to Do Things with Rules</i> J. Farrar, <i>Introduction to Legal Method</i>	-----
Contract	-----	-----	D.E. Allan (ed.), <i>Asian Contract Law: A Survey of Current Problems</i> (1968)*	M. Furmston (ed.), <i>Cheshire & Fifoot's Law of Contract</i> 9th Ed. (1976) G.H. Treitel, <i>Law of Contract</i> 4th Ed. (1975)	J.C. Smith & J.A.C. Thomas, <i>A Casebook on Contract</i> (1977)
Tort	-----	-----	K.S. Das, <i>Quantum in Accidental Cases</i> (1976)*	J.C. Fleming <i>Law of Torts</i> (1977) J.W. Salmond <i>Torts</i> (1977)	T. Weir, <i>A Casebook on Tort</i> (1974)
Criminal Law	K.L. Koh & Myint Soe, <i>The Penal Codes of Singapore & The States of Malaya</i> Vol. 1 (1974) K.L. Koh & M. Cheang, <i>The Penal Codes of Singapore & The States of Malaya</i> Vol. 2 (1976)	K.L. Koh, <i>Criminal Law</i> (No. 3) (1976)	-----	R. Ratanlal and Dhirajlal, <i>Law of Crimes</i> (1971)	-----
<u>Year 2</u>					
Land Law	S.Y. Tan, <i>Cases and Commentary on Land Law</i> (Mimeographed)	-----	A. Baalman, <i>The Singapore Torrens System: Being A Commentary on the Land Titles Ordinance 1958 of the State of Singapore</i> (1961)	G.C. Cheshire, <i>Modern Law of Real Property</i> (1976) R.E. Megarry & H.W.R. Wade, <i>Law of Real Property</i> (1975)	-----
Law of Associations	P. Pillai, <i>Sourcebook on Singapore/Malaysia Company Law</i> (1975) <i>First Supplement</i> (1976) <i>Second Supplement</i> (1978)	P. Pillai, <i>Legal Framework of Business Organisations</i> (No. 6) (1978)	A. Afterman, <i>Company Directors and Controllers: Their Duties to the Company and to the Shareholders</i> (1970) {Australian text with footnote references to Singapore and Malaysia.}	L.C.B. Gower, <i>The Principles of Modern Company Law</i> (1979) H.A.J. Ford, <i>Company Law</i> (1978)	L.S. Sealy, <i>Casebook on Company Law</i> (1978)

* Not prescribed.

<u>Course</u>	<u>Local Casebook/Sourcebook</u>	<u>Singapore Law Series</u>	<u>Local Textbook/Commentary</u>	<u>Foreign Textbook</u>	<u>Foreign Casebook</u>
Family Law	—	K.S. Wee, <i>Family Law</i> (No. 2) (1976)	—	F.M. Bromley, <i>Family Law</i> (1966) rather than (1976) because of substantive law changes in the U.K.	—
Public Law	S. Jayakumar, <i>Constitutional Law Cases from Malaysia and Singapore</i> (1976)	S. Jayakumar, <i>Constitutional Law</i> (No. 1) (1976)	M. Suffian, <i>An Introduction to the Constitution of Malaysia</i> (1976) Sheridan & Groves, <i>The Constitution of Malaysia</i> (1967) P.C. Goh, <i>Citizenship Laws of Singapore</i> (1970)	H.W.R. Wade, <i>Administrative Law</i> (4th Ed.)	—
<u>Third and Fourth Year</u>					
Trusts	—	—	—	R.H. Maudsley (ed.), <i>Hanbury & Maudsley Modern Equity</i> (1976)	Maudsley & Burns, <i>Trusts and Trustees: Cases and Materials</i> (1978)
Evidence	—	—	—	R. Cross, <i>Evidence</i> (1974)	J. Heydon, <i>Cases & Materials on Evidence</i> (1975)
Civil Procedure	—	—	B. Mallal, <i>Supreme Court Practice</i> (1961) (outdated)	Odger's <i>Principles of Pleadings and Practice in Civil Actions in the High Court of Justice</i> (1971) I.H. Jacobs, <i>The Supreme Court Practice</i> (1971)	—
Administration of Criminal Justice	—	—	B. Mallal, <i>Criminal Procedure</i> (1967) (outdated) C. Mohan, <i>Bail in Singapore</i> (1976)	Ratanlal & Dhirajlal, <i>The Criminal Procedure Code</i> (1975) N. Walker, <i>Sentencing in a Rational Society</i> (1972) P.S. Atiyah, <i>The Sale of Goods</i> (1976)	—
Commercial Transactions	—	—	K.L. Koh, D.E. Allan, M.E. Hiscock & D. Roebuck, <i>Credit & Security in Singapore</i> (1975)	Whiteman & Wheatcroft, <i>Income Tax</i> (1976) A.S. Silke, <i>South African Income Tax</i> (1975)	—
Revenue Law	—	—	—	—	—

* Not prescribed.

<u>Courses</u>	<u>Local Casebook/Sourcebook</u>	<u>Singapore Law Series</u>	<u>Local Textbook/Commentary</u>	<u>Foreign Textbook</u>	<u>Foreign Casebook</u>
Banking & Negotiable Instruments	Myint Soe, <i>Sourcebook of Banking Law in Singapore & Malaysia</i> (1977)*	Myint Soe, <i>Banks and Banking</i> (No. 5) (1977)	Myint Soe, <i>Law of Banking & Negotiable Instruments in Singapore & Malaysia</i> (1977)*	Baron Chorley, <i>Law of Banking</i> (1974) Holden, <i>Law and Practice of Banking</i> 2 vols.	—
Conflict of Laws	—	—	M.B. Hooker, <i>The Personal Law of Malaysia</i> (1976) A. Ibrahim, <i>Islamic Law in Malaya</i> (1966)*	J.H.C. Morris, <i>The Conflict of Laws</i> (1971) G.C. Cheslire, <i>Private International Law</i> (1970)	—
Jurisprudence	—	—	—	H.L.A. Hart, <i>The Concept of Law</i> and miscellaneous readings	—
Securities Regulation	P.T. Tan, <i>Securities Regulation in Singapore and Malaysia</i> (1978)	—	—	—	—
Conveyancing	—	—	Ernest Lim S.Y., <i>Conveyancing in Singapore</i> (1978)* (outdated)	J.T. Farrand, <i>Contracts and Conveyancing</i> (1984)	—
Public International Law	S. Jayakumar, <i>Public International Law Cases from Malaysia & Singapore</i> (1974)	—	—	J.C. Starke, <i>An Introduction to International Law</i> (1977)	D.J. Harris, <i>Cases and Materials on International Law</i> (1978)
Shipping Law	—	J. Wong, <i>Shipping Law</i> (No. 4) (1977)	J. Wong, <i>Law of Packing in Modern Export Trade</i> (1976)	Scrutton, <i>Charterparties and Bills of Lading</i> (1974) C. Carver, <i>Carriage By Sea</i> (1971) 2 Vols.	—
Law of Insurance	Myint Soe, <i>The Insurance Law of Singapore & Malaysia: Cases, Materials and Comments</i> (1977)	—	—	ER.H. Ivamy, <i>General Principles of Insurance Law</i> (1976) R. Colinvaux, <i>Law of Insurance</i> (1976)	—

Courses not offered in the year for which local literature exists include Labour Law; P.T. Tan, *The Industrial Relations Machinery of Singapore* (Unpublished thesis) and S.M. Thio & P.T. Tan, *Casebook on Labour Law* (1975) (mimeographed). A. Josey, *Industrial Relations (Labour Laws in a Developing Singapore)* 1976*

* Not prescribed.

*Appendix II**Cumulative Profile of Foreign Trained Local Staff 1961-1977**

<i>University</i>	First Degree in Singapore	First Degree Elsewhere	LL.M.	Ph.D.
<i>United Kingdom</i>				
Oxford	1	—	2 (B.C.L.)	1
Cambridge	1	1	2 (B.A. LL.B.)	1
London	4	1	3	2
Southampton	—	—	1 (M.Phil.)	—
Hull	—	1	—	—
Dublin	—	1	1	—
<i>North America</i>				
Harvard	5	—	5	1
Yale	2	—	3	—
Berkeley	2	—	2	—
Osgoode Hall	1	—	—	1
<i>Australia</i>				
Sydney	—	1	—	1
<i>Singapore</i>	<u>16</u>	<u>—</u>	<u>2</u>	<u>2</u>
<i>Totals</i>	16	4	17	8

* This compilation only includes those who obtained their degrees during or before joining the Faculty and excludes degrees acquired after leaving the Faculty. The term 'local staff' here is used to denote staff on contracts or establishment with local terms and comprises Singaporeans, Malaysians and other permanent residents.