

PRACTICE NOTE NO. 2 OF 2025
IN THE HIGH COURT OF JUSTICE IN NORTHERN IRELAND
FAMILY DIVISION
OFFICE OF CARE AND PROTECTION

HEARING BUNDLES, AUTHORITIES BUNDLES
AND
DISCLOSURE BUNDLES

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1. INTRODUCTION AND SCOPE

- 1.1 This Practice Note takes effect from 6 January 2026 and shall apply to proceedings issued in the Family Division pursuant to the Children (Northern Ireland) Order 1995, applications to free a child for adoption pursuant to the Adoption (Northern Ireland) Order 1987, Hague Convention (1980) proceedings, Human Rights Notices and proceedings issued under the inherent jurisdiction of the High Court.
- 1.2 This Practice Note is to be read and applied in conjunction with Practice Direction No 2 of 2022: Submission and Format of E-bundles and Practice Direction 6/2011 Skeleton Arguments and related documents, Appeal Books, Electronic Bundles and Core Bundles - Revised March 2021). Nothing in this Practice Note is to be read as removing or altering any obligation to comply with the requirements as set out in these aforementioned Practice Directions.
- 1.3 This Practice Note does not apply to the hearing of any urgent application if and to the extent that it is impossible to comply with it.

2. THE OBJECTIVES OF THE PRACTICE NOTE

- 2.1 The aim of this Practice Note is to achieve a streamlined, timely and effective presentation of documents relevant to hearings in family matters listed before the Family Division of the High Court of Justice in Northern Ireland.
- 2.2 Failure to comply with any part of this Practice Note may result in the judge removing the case from the list or putting the case further back in the list and may also result in an adverse costs order.

3. LITIGANTS IN PERSON

- 3.1 If a party is acting without legal representation, they should still comply with the terms of this Practice Note.
- 3.2 If a party becomes aware that another party is a litigant in person, they should send a copy of this Practice Note to the litigant in person at the earliest opportunity.
- 3.3 This Practice Note has been drafted with litigants in person in mind and, as far as possible, the use of legal jargon has been avoided.

4. CONTENTS OF THE HEARING E-BUNDLE

- 4.1 The hearing bundle must be lodged in e-bundle format, in compliance with Practice Direction No 2 of 2022: Submission and Format of E-bundles. The hearing bundle should not be lodged in hard copy unless directed by the judge.
- 4.2 The hearing e-bundle shall contain only those documents which are relevant and necessary to determine the issues in the case.
- 4.3 Every hearing e-bundle must begin with an index which must clearly identify and describe each section of the bundle and its contents, sample indexes are included at Annex A, B and C of this Practice Note.
- 4.4 Pagination should begin with the first page of the e-bundle (whether or not that is a cover page or part of an index) and must follow sequentially to the last page of the bundle. The e-bundle shall be divided into separate sections as follows:
 - (a) A single page case summary identifying issues in dispute (no more than 1 A4 page, in Book Antiqua font size 12);
 - (b) application and orders - in respect of interim care orders which are subsisting at the date of the hearing, it is sufficient to include only the original and current orders. Where it would assist the court, the parties may provide a list of the dates of renewals of the interim order throughout the proceedings;
 - (c) statements of evidence, affidavits and any statement of threshold;
 - (d) position papers;
 - (e) reports and care plans filed by any Health Trust and/or the Court Children's Officer;
 - (f) report filed by the Children's Court Guardian or the Official Solicitor;
 - (g) expert reports and assessments;
 - (h) any other relevant documents, [NOTE: It is not likely that the following will be considered to be "relevant documents": correspondence between legal representatives, letters of instruction, copies of emails and any form of social media communications, voice notes and other recordings, financial records, notes of contact visits, carers' logs and Social Services records. However, this does not prevent the inclusion in the bundle of

specific documents which it is necessary for the court to read, or which will actually be referred to in the hearing.];

- (i) a list of any disclosure to be relied upon for the hearing as detailed in paragraph 7.3 below.

5. **FORMAT OF THE HEARING E-BUNDLE**

- 5.1 Hearing e-bundles must be provided in the format prescribed by paras [9] to [19] of the Practice Direction No 2 of 2022: Submission and Format of E-bundles.

6. **CHRONOLOGY, SKELETON ARGUMENTS, LIST OF AUTHORITIES**

- 6.1 Where appropriate the judge may direct the filing of:

- (a) a chronology;
- (b) skeleton arguments;
- (c) a list of authorities.

These documents are to be filed separately from the hearing e-bundle in a **separate authorities e-bundle**, indexed and paginated. Unless the court has specifically directed otherwise, the authorities e-bundle shall not contain more than 10 authorities.

The content of any authorities e-bundle shall comply with Annex E of the Practice Direction 6/2011 Skeleton Arguments and related documents, Appeal Books, Electronic Bundles and Core Bundles - revised March 2021 and with Practice Direction No 2 of 2022: Submission and Format of E-bundles

Such authorities e-bundles shall be lodged with the court and provided to all parties not less than 2 working days before the hearing, or at such other time as may be specified by the court.

7. **DISCLOSURE AND CONTENTS OF THE E-BUNDLE**

- 7.1 The process of disclosure is the practice of giving access to a document or other evidence relevant to a case to other parties in advance of the hearing. A party discloses a document by stating that the document exists or has existed. Inspection may occur where a party is permitted to inspect a document disclosed by another party. Nothing in this Practice Note about the preparation and lodgement of Disclosure and Hearing Bundles precludes the inspection of documents which have been disclosed.

- 7.2 Disclosure must be provided in a timely fashion to allow for the matters outlined at paragraph 7.3 to be addressed. Therefore, all disclosure must be exchanged between the parties no less than 20 days before the hearing. Save as directed under paragraph 7.4 below, it is not necessary to file hard copies of disclosure with the court.
- 7.3 The parties shall agree and include within the hearing e-bundle a list of the disclosable documents which will be relied upon at the hearing. This list shall provide links to or the page numbers of the documents to be relied upon within the disclosure -bundle.
- 7.4 The disclosure bundle shall be filed electronically with the court in an indexed, paginated bundle no less than 5 days before the hearing. The disclosure e-bundle will contain only the disclosable documents that will be relied upon at the hearing. The court will direct whether and when a hard copy of this e-bundle should also be filed. Unless the court has specifically directed otherwise, the disclosure e-bundle shall be limited to 250 pages.

8. TIMETABLE FOR PREPARING AND LODGING THE HEARING BUNDLES

- 8.1 The party preparing the hearing e-bundles shall provide a paginated index for the e-bundle to all other parties no less than 5 working days before the hearing.
- 8.2 The hearing e-bundles shall be lodged with the court and provided to all parties not less than 2 working days before the hearing, or at such other time as may be specified by the court.
- 8.3 Where the parties agree that an application should be made to take the case out of the list for hearing (whether because disputed matters are being resolved or otherwise) the parties will make a joint approach to the court office by email. The emailed correspondence to the court office will contain a summary of developments and a draft order which reflects the consensus which the parties have achieved, including, where relevant, provision for pausing, maintaining or abandoning the timetable for lodgment of hearing and disclosure bundles.

9. RESPONSIBILITY FOR PREPARATION OF THE HEARING BUNDLE

- 9.1 A hearing e-bundle for the use of the court at the final hearing shall be provided by the party in the position of applicant (or, if there are cross-applications, by the party whose application was first in time) or, if that person is a litigant in person in accordance with the direction of the court. Where possible, the contents of the e-bundle shall be agreed.

10. FILING OF THE HEARING E- BUNDLE

- 10.1 The hearing e-bundle shall be submitted via an email containing a cloud-based link to the appropriate court office for the relevant proceedings. The party who is responsible for lodging the e-bundle shall make appropriate arrangements for the use by the witnesses of the e-bundle, or provide a hard copy bundle for use by the witness if so directed by the court.
- 10.2 Additional documents, if any, must be lodged by 11 am on the day of the hearing and shall be accompanied by an explanation for the late submission of such documents. Additional Documents must be provided in the format prescribed at para 19 of the Practice Direction No 2 of 2022: Submission and Format of E-bundles.

Dated this 1st day of DECEMBER 2025.

Signed 
Senior Family Judge

ANNEX A
SAMPLE INDEX

In an application pursuant to Article 8 of the Children (Northern Ireland) Order
1995

1.	Agreed case summary and issues	Page XX
2.	<u>Applications and Orders</u>	
	(a) C1	Page XX
	(b) C1A	Page XX
	(c) C1AA	Page XX
	(d) C4	Page XX
	(e) C2 application dated XXXX	Page XX
	(f) Court order dated XXXX	Page XX
	(g) Court order dated XXXX	Page XX
3.	<u>Statements of Evidence</u>	
	(a) Mother's statement of evidence dated XXXX	Page XX
	(b) Father's statement of evidence dated XXXX	Page XX
4.	<u>Position Papers</u>	
	(a) Mother's position paper dated XXXX	Page XX
	(b) Father's position paper dated XXXX	Page XX
5.	<u>Reports & Care Plans</u>	
	(a) Court Children's Officer's report dated XXXX	Page XX
6.	<u>Expert Reports</u>	
	(a) Dr Smith, Consultant Psychiatrist	Page XX
7.	<u>Any other relevant documents (examples)</u>	
	(a) UNOCINI report dated XXXX	Page XX
	(b) Child's birth certificate	Page XX
	(c) Probation report	Page XX
	(d) Hair follicle tests	Page XX

ANNEX B

SAMPLE INDEX

In an application pursuant to Article 50 of The Children (Northern Ireland) Order 1995

1. **Preliminary Documents**
 - (a) Case summary Page XX
 - (b) Statement of issues Page XX
 - (c) Position paper by applicant Trust dated XXXX Page XX
 - (d) Position paper by respondent mother dated XXXX Page XX
 - (e) Position paper filed by respondent father dated XXXX Page XX
 - (f) Position paper filed by Children's Court Guardian on XXXX Page XX
2. **Applications and Orders**
 - (a) C1 Page XX
 - (b) C1A Page XX
 - (c) C4 Page XX
 - (d) Court order dated XXXX Page XX
3. **Statements of Evidence**
 - (a) Mother's statement of evidence dated XXXX Page XX
 - (b) Father's statement of evidence dated XXXX Page XX
 - (c) Threshold statement dated XXXX Page XX
4. **Reports & Care Plans**
 - (a) Initial social worker statement dated XXXX Page XX
 - (b) Initial care plan dated XXXX Page XX
 - (c) Final social worker statement dated XXXX Page XX
 - (d) Final care plan dated XXXX Page XX
5. **Reports by the Children's Court Guardian**
 - (a) Initial report, CCG dated XXXX Page XX
 - (b) Final report, CCG dated XXXX Page XX
6. **Expert Reports**
 - (a) Dr Jones, Consultant Psychologist Page XX
7. **Any other relevant documents (examples)**
 - (a) Hair follicle test results Page XX

ANNEX C

SAMPLE INDEX

In the matter of the Child Abduction and Custody Act 1985

1. Preliminary Documents

(a) Case summary	Page XX
(b) Statement of issues	Page XX
(c) Chronology	Page XX
(d) Skeleton argument filed on behalf of the defendant	Page XX
(e) Skeleton argument filed on behalf of the plaintiff	Page XX
(f) List of authorities	Page XX

2. Applications and Orders

(a) Originating summons dated XXXX	Page XX
(b) Court order dated XXXX	Page XX

3. Affidavits

(a) Plaintiff's grounding affidavit	Page XX
(b) Defendant's replying affidavit	Page XX
(c) Affidavit of laws filed on behalf of the plaintiff	Page XX

4. Reports by the Official Solicitor

(a) Official Solicitor's report dated XXXX	Page XX
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5. Any other relevant documents (examples)

(a) Court order from Australia dated XXXX	Page XX
(b) Photocopy of child's passport	Page XX
(c) Notice of legal aid	Page XX