

that the speed was not the only factor that brought about the disaster, it is abundantly clear that it was the chief determining cause. Praise is accorded where due, and Lord Mersey is not sparing in censure when such is deserved; while certain unfounded aspersions that during the inquiry were cast on certain persons are described as unfounded. It is not surprising that the failure of the Board of Trade to revise their rules should be the subject of adverse criticism at the hands of the commissioner, while his recommendations with regard to boat drill, look-outs, and wireless telegraphy will commend themselves to everybody. The recommendation also that an international conference should be called to consider and, as far as possible, to agree upon a common line of conduct upon the main questions raised in this inquiry is a good one, and might do much to assist in reducing some of the dangers which exist as regards ships at sea.—*Law Times*.

ACCIDENT DUE TO WORKMAN'S DISOBEDIENCE.

But for judicial intervention, the provisions of sect. 1, subsect. 2 (c), of the Workmen's Compensation Act 1906 (6 Edw. 7, c. 58) would bear far more harshly and unfairly on employers of labour than in fact they do. Attention, therefore, cannot too frequently be called to instances where a corrective restraint has been enjoined by the courts. And the latest of them is furnished by the decision of the Court of Appeal in the recent case of *Parker v. Hambrook* (noted ante, p. 280). The effect of the subsection is that a workman, who has met with an accident and has thereby sustained an injury which is attributable to his "serious and wilful misconduct," becomes disentitled to compensation—"unless the injury results in death or serious and permanent disablement." It is seen, therefore, that, according to the Act, the graver the consequences of a workman's "misconduct" the more does the severity of the burden imposed on the employer manifest itself. But even where "death or serious and permanent disablement" results from the injury, mitigation is