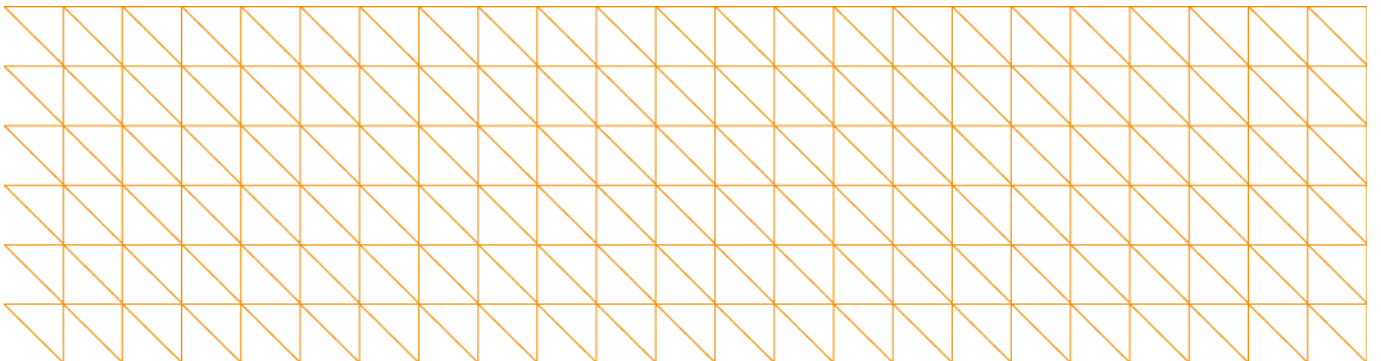




Fee remissions in the First-tier Tribunal (Immigration and Asylum Chamber)

Response to Consultation CP(R) 24/2012
This response is published on 26 March 2013





Ministry of
JUSTICE

Fee remissions in the First-tier Tribunal (Immigration and Asylum Chamber)

Response to consultation carried out by the Ministry of Justice.

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Introduction and contact details

This document is the post-consultation report for the consultation paper 'Fee remissions in the First-tier Tribunal (Immigration and Asylum Chamber).'

It will cover:

- the background to the report;
- a summary of the responses to the report;
- a detailed response to the specific questions raised in the report; and
- the next steps following this consultation.

Further copies of this report and the consultation paper can be obtained by contacting **Ross Sanger** at the address below:

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Background

1. The consultation paper 'Fee remissions in the First-tier Tribunal (Immigration and Asylum Chamber)' was published on 18th December 2012. It invited comments on the proposals for addressing the removal of immigration legal aid in England and Wales, from the current immigration fees exemptions, which forms part of the fees exemptions and remissions system for the First-tier Tribunal (Immigration and Asylum Chamber).
2. These exemptions and remissions enable appellants that cannot pay an appeal fee (or have it paid on their behalf) to access the Tribunal to determine their appeal against an immigration decision.
3. In particular, the consultation paper proposed to:
 - Identify an alternative means to establish whether or not immigration appellants can pay the fee or should have their appeal fee remitted;
 - Retain all other current exemptions;
 - Retain the Lord Chancellor's power to reduce or remit fees;
 - Maintain a different fee remission system for immigration appeals (than the wider civil court fee remission system administered by Her Majesty's Courts and Tribunals Service ("HMCTS")), that does not unfairly discriminate between in-country and out-of-country appellants;
 - Aim to ensure that the poorest appellants are able to access the Tribunal if they are unable to pay the fee (or have the fee paid by a third party e.g. a family member); and
 - Not require amendment of the First-tier Tribunal (Immigration and Asylum Chamber) Fees Order 2011.
4. During the consultation respondents were asked whether:
 - They agree with the proposed approach to fee exemptions and remissions for the First-tier Tribunal (Immigration and Asylum Chamber), giving explanations for their answers, or if not what other approach they think should be considered; and
 - They consider there are any potentially positive or adverse equality impacts on appellants appealing an immigration decision of the proposed approach, how these might be mitigated and to provide any further evidence that they are aware of that could aid our analysis of potential equality impacts.
5. The consultation period closed on 29th January 2013 and this report summarises the responses, including how the consultation process influenced the final proposal consulted upon.

6. A number of equality issues and questions about the accuracy of the data used to inform the consultation were received. They have been proportionately addressed below in the consultation response, indicating how we have considered the impact of the issues raised against statutory obligations under the Equality Act 2010. In light of these comments we have reviewed the data contained in our consultation stage Impact Assessment and initial Equality Impact Assessment. In the absence of better statistical information our assumptions and initial estimation of the number of appellants that may be affected by our proposal appear to be correct. However, we will monitor the number, type and outcome of immigration appeals and revisit when further data is available.
7. A list of respondents is at Annex A.

Summary of responses

8. The consultation paper was sent to over 70 organisations and interested parties. A total of 10 responses to the consultation paper were received. Not all the respondents chose to answer all the questions and some respondents opted to submit their response in the form of an extended letter without necessarily directly answering some or all of the questions. In those cases where particular references are clearly to particular questions in the consultation paper, those references have been treated for the purposes of analysis as answers to those questions. We would like to thank all those who took the time to respond to the consultation.
9. Respondents consisted of:
 - Individuals – 4 (40%)
 - Legal Professions – 3 (30%)
 - Representatives – 3 (30%)
10. The responses were analysed for possible alternatives to the suggested proposals, evidence of impact of the proposals, and levels of support to the general principles.
11. Over half of all the responses received (60%) did not agree with the proposed approach for immigration appeal fees remissions, as set out in the consultation paper, while a nearly a third agreed (30%) and one respondent (10%) provided no direct answer. Respondents' concerns in relation to the individual questions and our responses to them are summarised below.

Responses to specific questions

Q1 Do you agree with our proposed approach to fee exemptions and remissions for the First-tier Tribunal (Immigration and Asylum Chamber)? Please give reasons.

12. From the 10 responses received in total, 9 responses were received in respect of Q1, from the following categories of respondent.
- Individuals – 4
 - Legal Professions – 2
 - Representatives – 3
13. 30% stated that they agreed with the proposal and 60% disagreed. 10% provided no direct answer.
14. Not all of the respondents who agreed with our proposed approach gave reasons, but those who did commented that appellants who can afford to pay should pay the appeal fee. One respondent qualified their response by commenting that:
- “there should be a properly regulated process with qualified lay people involved and that Lawyers are not the right people to decide.”*
15. Respondents who disagreed with our proposed approach gave a number of varying reasons. These are set out below.

Access to justice

16. Some respondents commented that legal aid should not be removed for immigration appellants. One respondent commented that:
- “The latest fee remissions proposals would appear to raise yet a further barrier for users. Not only will they no longer be entitled to legally-aided advice, assistance and representation, but those who would previously have received legal aid will lose the automatic right to fee remission, apparently because the government cannot identify an alternative method of establishing who would previously have qualified for legal aid.”*
17. The point was also made that:
- “Such appellants and their sponsor may face the barriers of disability and in some cases age, language or the impact of trauma they have experienced on top of the challenge of presenting the case without the assistance of a legal representative. Tribunal systems and correspondence are not as user-friendly as they might at first appear, especially to those unfamiliar with UK systems and procedures.”*

18. Respondents also argued that the proposed approach could impact on accessing the justice system, if appellants cannot afford the fee. Two respondents argued that this could be problematic, particularly in the case of a large family where each member is required to pay a fee which could result in high appeal fees. The point was also made that children turning 18 who are not in receipt of funding under section 17 of the Children Act 1989 could be at a disadvantage when applying for an 'exceptional circumstances' remission if they are not assisted by a legal representative to help them. Furthermore, the respondent considered it inequitable to require such appellants to apply for fee remission at the discretion of the Lord Chancellor.

Our consideration of these concerns

19. From 1st April 2013 immigration cases will generally no longer be within the scope of legal aid. The Government's view is that, in general, individuals in immigration cases should be capable of dealing with their immigration application and should not require a lawyer. The tribunal process in these cases is designed to be straightforward and interpreters are provided free of charge. Tribunals request information on interpreters and any other requirements on the appeal form itself and accompanying literature which signposts tribunal users to this provision. For those cases that have an in-country sponsor, assistance in completing forms may also be provided by the sponsor.

20. Legal aid will remain available for immigration detention cases where the appellant's liberty is at stake, domestic violence immigration cases and for immigration advice for victims of trafficking. Legal aid is a vital part of the justice system. But it is important that it is targeted at people who need legal support the most, and on the most serious cases.

21. Having considered the consultation responses the Government maintains the view that the proposed approach to fee exemptions and remissions for the First-tier Tribunal (Immigration and Asylum Chamber) enables appellants that cannot pay an appeal fee (or have it paid on their behalf) to access the Tribunal to determine their appeal against an immigration decision.

22. Appeal fees are £80 for a paper determination and £140 for an oral hearing. These fees are not set higher than 25% of the full cost of an appeal therefore the UK taxpayer subsidises the vast majority of appeals. We consider that those who can afford to pay should pay a fee as a contribution towards the cost of their appeal. Appellants who are successful at appeal are awarded costs (up to the value of the fee), if UKBA's decision should have been made in favour of the appellant on the information they provided at the time of the original decision.

23. Our consultation paper made it clear that our assumption of whether an appellant can afford the fee (if they meet UKBA's maintenance and accommodation tests in the Immigration Rules) may be wrong, e.g. if an appellant's circumstances changed after satisfying UKBA that they can support themselves/be supported while in the UK without recourse to

public funds. In this situation the appellant can make a remission request to HMCTS, explaining why their 'exceptional circumstances' prevent them from paying their appeal fee (including supporting evidence). If an appellant is not subject to UKBA's maintenance and accommodation tests, and we are therefore unable to determine whether they can pay the fee, then the appellant will also be able to make an application for an appeal fee remission for the Lord Chancellor to exercise his discretion to reduce or remit the fee.

24. Where multiple fees are paid by a family for the same application, those who are unable to afford the fees can make an application for the Lord Chancellor to exercise his discretionary power to partially or fully remit the fee(s). The application will need to set out the 'exceptional circumstances' that render them unable to pay the fee. Each application will be considered on its own merits by HMCTS on behalf of the Lord Chancellor.
25. We acknowledge that we do not know precisely what the accumulative effect will be on those immigration appellants that will no longer receive legal aid (and will not receive any other exemption or will not receive a remission under the Lord Chancellor's power to remit or reduce a fee), so will have to pay a fee or will no longer receive legally aided advice to assist with the appeal process. However, we will keep this under review and revisit when more data is available.

Publish 'exceptional circumstances' decision criteria

26. Three respondents requested that the decision criteria for determining whether to allow a remission request in 'exceptional circumstances' is published. For example, one respondent commented that:

"...it is not possible to comment meaningfully on the proposed new discretionary power of the Lord Chancellor to reduce or remit the fee(s) in 'exceptional circumstances' since the proposals fail to explain what such exceptional circumstances might be, or how the Lord Chancellor's discretion is likely to be applied, or by whom on his behalf...this as yet unsubstantiated proposal lacks the sufficient degree of openness, fairness and transparency necessary to support it."

Our consideration of these concerns

27. At present, appellants that consider that due to 'exceptional circumstances' they are unable to pay the appeal fee can apply to have the fee reduced or remitted, to be considered under the Lord Chancellor's power to do so. If they wish to make an application, then they can write to HMCTS, specifying the reasons why their 'exceptional circumstances' prevent them from paying the appeal fee and they need to include appropriate supporting evidence. Upon receipt, applications are considered by an administrative manager. We maintain the view that this process should continue post April 2013. HMCTS considers each application on its own merits and it is for the appellant to make their case for a remission and satisfy HMCTS that paying the appeal fee would have financial consequences that would seriously impact on their day-to-day life. However, we acknowledge there is validity in

the point that, whilst information is made available about how to apply for a remission when an applicant is faced with 'exceptional circumstances', we should review the criteria for determining 'exceptional circumstances'. We will do so with a view to amending our existing public guidance to support applicants to understand the criteria which is likely to be applied to applications for a remission to be considered under the Lord Chancellor's power to reduce or remit a fee.

Impact of the proposal

28. Two respondents questioned the statistical basis for the assumptions underlying our proposals and suggested that the number of appeals affected by the removal of legal aid (approximately 2,500) may be higher and the impact of the proposals could be greater than anticipated as the data used for the estimate is less than a full calendar year and one respondent requested that *"the Ministry of Justice provide full figures for the number of pending requests for 2011-12 to give a more realistic picture of the potential number of appellants who could be affected by these proposals."*

Our consideration of these concerns

29. In light of these comments we have reviewed the data contained in our consultation stage Impact Assessment and initial Equality Impact Assessment. In the absence of better statistical information our assumptions and initial estimation of the number of appellants that may be affected by our proposal appear to be correct. However, we will monitor the number, type and outcome of immigration appeals and revisit when further data is available.

Maintenance and Accommodation Test

30. Two respondents pointed out that the original consultation paper (Annex A) stated that the Immigration Rules does not provide a minimum figure for what represents sufficient maintenance. However, this statement has been superseded, concerning family migration applications, by Appendix FM to the Immigration Rules which does now give explicit minimum figures for earnings, and does specify what income may be counted towards this total.

"For those in scope and for any child applicant who is not applying for entry clearance at the same time as their sponsor's partner, the relevant threshold for maintenance is "adequacy", which has been held to mean no more than the income support level for a British family of the same size. This derives from a tribunal determination¹ which recognised there should be no discrimination made between immigrant and non-immigrant families when defining the meaning of what was adequate. This is acknowledged in the Entry Clearance Guidance."²

¹ UKAIT [2006] 00065 KA and Others (Pakistan).

² Entry Clearance Guidance, MAA4,

www.ukba.homeoffice.gov.uk/policyandlaw/guidance/ecg/maa/#header4

31. One respondent pointed out that we had not listed all groups of people that are not subject to UKBA's maintenance and accommodation test:

“There are also appellants who may be exempt from the usual threshold for maintenance and accommodation under the Immigration Rules, either as the partner of a sponsor in receipt of a disability benefit or as the child of someone with settled status when the child is the sole subject of the entry clearance application.”

Our consideration of these concerns

32. We acknowledge the point made that the consultation paper did not list all of the categories that are not subject to UKBA's maintenance and accommodation test. If any appellant that is not subject to UKBA's maintenance and accommodation test claims they cannot pay the appeal fee and does not qualify for any other exemption, they will be able to make an application for the Lord Chancellor to exercise his discretion to reduce or remit the fee. These appellants would need to write to HMCTS, specifying the 'exceptional circumstances' which would justify the Lord Chancellor in exercising his discretion in their favour. They would be required to provide appropriate supporting evidence. Their applications would be considered by an administrative manager.

Relationship between the Fees Order and Guidance

33. One respondent requested that the Fees Order is amended to make clear for entry clearance appeals, that when either the sponsor or the appellant is in receipt of legal aid, then the appeal is exempt from a fee. The respondent argued that appellants with a sponsor in receipt of legal aid should be entitled to an exemption for payment of a fee.

Our consideration of these concerns

34. It is our view that the Fees Order does not require an amendment because the Fees Order makes clear that it is the appellant that is required to be means tested for the purposes of requesting a legal aid remission and not their sponsor. In our view, it does not follow that because the sponsor has been granted legal aid, the appellant must necessarily be unable to pay the fee. Therefore we see no case to amend the Fees Order to provide that whenever a sponsor is in receipt of legal aid the appellant should be exempt from paying the fee. For the same reason, we see no reason to amend our guidance.
35. However, we do accept that there will be some situations where, for instance, the appellant may not be able to afford the fee because they are a refugee child abroad and the sponsor in the UK is in receipt of legal aid. In such a situation it may be appropriate for the Lord Chancellor to exercise his discretion and reduce or remit the fee. But that will depend on evidence being produced to the effect that the fee cannot be paid.
36. The Legal Services Commission published '*Clarification regarding exemptions from Immigration & Asylum Tribunal appeal fees for appellants in receipt of Legal Aid*' in November 2012 and a newsletter article was

issued to legal representatives to provide clarity; so we believe that this issue has been addressed.

Q2 If you do not agree with our proposed approach to fee exemptions and remissions for the First-tier Tribunal (Immigration and Asylum Chamber), what other approach do you think should be considered and why? Please give reasons.

37. From the 10 responses received in total, 6 responses were received in respect of Q2, from the following categories of respondent.

- Individuals – 1
- Representatives – 3
- Legal Professions – 2

38. Five respondents (50%) thought that the HMCTS court fee remission system should be extended for this Tribunal. This included two respondents who acknowledged the difficulties of adopting this remission system particularly for those appellants that are overseas, but argued that UK based immigration appellants should not be excluded from using the HMCTS remission system; and one respondent commented that the HMCTS remission system could be supplemented with “*special measures to protect appellants before this chamber*” and suggested that:

- *“Any out-of-country appellant should be entitled to apply for remission under the category “Remission 1” in the same system in place for other tribunals if their sponsor is in receipt of a means tested benefit, or any of the benefits in [Immigration Rule] E-LTRP.3.3, on the basis that the threshold for “adequate” maintenance in all those cases would be no more than the Income Support (or equivalent) level for a British family. The use of the Remission 1 category would of course result in successor benefits to Income Support being taken into account as that system was modified to reflect the benefit system currently in force;*
- *All children under 18 should be exempt from paying a fee;*
- *All trafficked persons should be exempt from paying a fee;*
- *All survivors of domestic violence should be exempt from paying a fee;*
- *All applicants for refugee family reunion should be exempt from paying a fee; and*
- *All cases where there is no application fee to be paid to the UK Border Agency, either in general or in the particular case (for example domestic violence cases where an applicant has successfully argued for a fee waiver) should be exempt from paying a fee. Such cases include those where either no fee can be charged as a matter of law (for example cases under European Union law) or where it is recognised that to charge a fee might be a bar to justice in the case.”*

39. One respondent suggested that:

“...the fee that is charged should be per hearing/determination and not per appellant, because the resources of the judiciary and Ministry of Justice are not measured/costed by the number of appellants but by the number of hearings/determinations generated. It is disproportionate to expect families seeking unification through one hearing, to have to pay for each appellant.”

40. One respondent who did not support the proposals put forward the suggestion that an assessment of cost could be made by those who may be able to contribute towards the cost of their appeal, particularly when the appellant has been successful.

41. One respondent made the point that it was unfair that fees are charged in the Immigration and Asylum Chamber but fees are not charged in some of the other chambers of the First-tier Tribunal, including matters such as mental health and taxation. It was also argued that users of the Immigration and Asylum Chamber should be asked to pay nothing or to pay less than appellants in other parts of the tribunal system.

42. Two respondents said an in-country appellant could potentially receive different treatment in different parts of HMCTS and would qualify for automatic remission in some tribunals or courts but would have to apply to use the Lord Chancellor's discretionary powers to remit in the Immigration and Asylum Chamber of the First-tier Tribunal. They considered this to be discriminatory.

Our consideration of these concerns

43. Our long-term aim is to recoup more of the costs to HMCTS of running tribunals, to reduce the subsidy currently provided by the general taxpayer and to transfer more of the cost of the service to those who use it. The power to charge fees is contained in the Tribunals, Court and Enforcement Act 2007. Fees are charged in a number of jurisdictions, in addition to the Immigration and Asylum Chamber. For example fees are charged for gambling appeals, disputes over land and in the gender recognition jurisdiction. In early 2011 the Government announced its intention to charge fees for users of employment tribunals and this will be introduced later this year. The introduction of fees for other tribunals will also be considered in due course. Without fee charging the level of service provided by HMCTS could be compromised and other cost-saving measures would need to be considered.

44. We are not persuaded by the suggestions that favour extending HMCTS' court fee remission system to immigration appeals. Our consultation paper acknowledged that HMCTS's court fee remission system could work for those that are in-country but clearly set out the reasons why it would not be a workable solution for a large number of out-of-country appellants. Therefore, we maintain the view that a separate, single remission system for all immigration appellants - rather than one system for in-country appellants and another for out-of-country appellants, which could be argued would risk discrimination between these groups of appellants - is

continued. It is our view that the proposed single remission system would not unfairly discriminate between in-country and out-of-country appellants nor would it discriminate against in-country appellants who would qualify for fee remission in other parts of HMCTS. This is because it is based upon the principle that anyone who claims they cannot afford the fee will be able to apply for a remission via the Lord Chancellor's power to reduce or remit a fee. Therefore no one should, as a result of the Government's proposals, be denied access to justice because they cannot afford the fee.

45. Where multiple fees are paid by a family for the same application, those who are unable to afford the fees can also make an application to the Lord Chancellor to exercise his power to reduce or remit the fees. The application will need to set out the 'exceptional circumstances' that render them unable to pay the fee. Each application will be considered on its own merits.

Q3 What do you consider to be the potentially positive or adverse equality impacts on appellants appealing an immigration decision of the proposed remission system for immigration appeals?

46. Just under half of all responses (40%) did not provide comments on this question, or respondents stated that they had no specific comments to make.

47. One respondent commented by saying that:

"as long as a well thought out process is administered, taking into account the differences in circumstances, then it should be fine."

48. Some comments were received on potential adverse equality impacts. For example:

- Financial – One respondent thought that the proposed system would favour wealthy applicants.
- Discrimination - One respondent commented that the proposed remission system discriminates between users of the Immigration and Asylum Chamber of the First-tier Tribunal and users of other tribunals and that users of the Immigration and Asylum Chamber are treated less favourably than users of other tribunals and courts. For example, in any other tribunal a family with an income of no more than income support level would be entitled to a fee remission and not extending the same rules to the Immigration and Asylum Chamber discriminates against them. It was also suggested that *"it is often the case that recipients of disability benefits also receive a means-tested benefit such as Income Support. Such sponsors or appellants would be eligible for legal aid and under the normal Her Majesty's Courts and Tribunals Service fee remission system they would automatically be eligible for full remission based on Remission category 1. This would also be true of a recipient of guaranteed State Pension Credit. A sponsor or appellant in receipt of means-tested benefit should automatically be exempt from fee payment. To do otherwise would risk discrimination, as they would be entitled to fee remission in any other branch of the court system."*

- Disabled sponsors – It was suggested by one respondent that the proposals would also have a disproportionate impact on disabled sponsors who are not required by the Immigration Rules to meet the same maintenance and accommodation threshold as those who are not in receipt of a disability benefit and who would likely be passported to fee remission in any other tribunal by virtue of their benefits or income.

Q4 How could these impacts be mitigated?

49. One respondent suggested that extending HMCTS's court fee remission system would help to address equality impacts, particularly for poorer appellants in certain race and gender groups.

Q5 Are you aware of any further evidence that could aid our analysis of potential equality impacts? If so please provide us with this evidence.

50. No further evidence was provided by respondents however, one respondent commented that the Government has already committed to "rigorous, regular and early reviews", of the impact of the 2011 consultation proposals. The respondent asked that we:

"...provide the data from these reviews and explain how they have been conducted. The data used as the basis for the current Equality Impact Assessment relates to figures from the Legal Services Commission dated 2009-2010. Until assessments can be made using up-to-date figures, the proposed levy of additional fees should be suspended."

Our consideration of these concerns

51. An internal review of fees in the Immigration and Asylum Chamber is currently underway. The findings from the review will inform future development work. Since fees were introduced in the Immigration and Asylum Chamber of the First-tier Tribunal, HMCTS has sought to improve the quality of its equality data. As part of this, HMCTS now collects user data via a customer survey questionnaire to better understand who uses the Immigration and Asylum Chamber of the First-tier Tribunal and to learn of their experience in using the Tribunal. This information helps HMCTS to find out whether policies are effective and take steps to ensure the impact of future policies can be fully assessed to try to avoid any adverse impacts on its customers.
52. We have noted respondent's comments about extending the HMCTS court fee remissions system to the Immigration and Asylum Chamber but we maintain the view that our preferred approach is justified as a proportionate means of achieving a legitimate aim - to ensure that those who can afford to contribute to the cost of their appeals should do so, but those who cannot pay the fee should not be prevented from accessing the Tribunal as a result. We consider that the availability of the Lord Chancellors power to reduce or remit fees will afford sufficient protection to those who cannot afford to pay the fees.

53. We remain of the view that the proposals would not give rise to direct discrimination. The proposals are not expected to treat anyone less favourably because of their protected characteristic. Our assessment, based on the limited information available, is that there remains the potential for the proposals to have a greater impact on particular equality groups. For example, those who will no longer receive an automatic fee remission when legal aid is removed from some immigration appeals from April 2013, specifically women and people from ethnic minority backgrounds such as Somalia, Nigeria, Pakistan or Eritrea. However, we consider it unlikely that those impacts will amount to a particular or substantial disadvantage as all appellants would be able to apply for a remission using the Lord Chancellor's power to reduce or remit the fees if they are unable to afford the fees. In any event, we consider the proposals and any resulting impacts remain a proportionate means of achieving a legitimate aim – to ensure that those who can afford to contribute to the cost of their appeal should do so, but those who cannot pay the fee should not be prevented from accessing the tribunal as a result. Therefore we do not consider that the proposals will amount to indirect discrimination.

Conclusion and next steps

54. The consultation closed on 29th January 2013. A total of 10 responses were received and after careful consideration of these responses, the Government has decided to proceed with all of the changes set out in the consultation paper.
55. We acknowledge there is validity in the point that, whilst information is made available about how to apply for a remission when an applicant is faced with 'exceptional circumstances', we should review the criteria for determining 'exceptional circumstances'. We will do so with a view to amending our existing public guidance to support applicants to understand the criteria which is likely to be applied to applications for a remission to be considered under the Lord Chancellor's power to reduce or remit a fee.
56. We will review the impact of our approach once further data is available.
57. The changes to fee remissions in the First-tier Tribunal (Immigration and Asylum Chamber) for immigration appellants will be implemented from 1st April 2013.

Consultation Co-ordinator contact details

58. If you have any comments about the way this consultation was conducted you should contact Sheila Morson on 020 3334 4498, or email her at: sheila.morson@justice.gsi.gov.uk.

59. Alternatively, you may wish to write to the address below:

**Ministry of Justice
Consultation Co-ordinator
Better Regulation Unit
Analytical Services
7th Floor, 7:02
102 Petty France
London SW1H 9AJ**

Annex A – List of respondents

Legal Professions

Immigration Law Practitioners' Association

Law Society

Northern Ireland Legal Services Commission

Representative and Other Bodies

Administrative Justice and Tribunals Council

Equality and Human Rights Commission

International Care Network

Individuals

Fulbahar Ruf

NGC Nicolson-Burrey

Paul Thackray

Shan Barclay

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