

Title: Abolition of HM Inspectorate of Court Administration Lead department or agency: Ministry of Justice (MoJ) Other departments or agencies:	Impact Assessment (IA)
	IA No: MOJ007
	Date: 18/05/11
	Stage: Consultation
	Source of intervention: Domestic
	Type of measure: Primary legislation
Contact for enquiries: Elinor Howard 020 3334 3284	

Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

In 2010 the government carried out a review of all Arm's Length Bodies (ALBs) to ensure that all ALBs are transparent and accountable, provide essential value for money, and provide effective services that are required to be funded by the State. HM Inspectorate of Court Administration (HMICA) was included in the review. In considering whether an ALB should be retained, they were reviewed against criteria set by the Cabinet Office - whether the organisation needs to perform a technical function, act independently to establish facts or be politically impartial. HMICA was assessed not to have met any of these tests, and the decision was taken that it should be abolished. Following this decision, a number of staff left the Inspectorate and it became increasingly difficult to plan a meaningful work programme, HMICA therefore closed administratively in December 2010, but remains on statute. Government intervention is required because legislation is required to legally close HMICA.

What are the policy objectives and the intended effects?

To ensure that all ALBs are transparent and accountable, and provide essential value for money, effective services that are required to be carried out and funded by the State.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

0 Do Nothing - HMICA is left on statute but does not in practice operate, as it closed administratively in December 2010.

1 Formally Abolish HMICA - This is the preferred option. The landscape in which HMICA operates has changed considerably since its inception, and Her Majesty's Courts and Tribunals Service (HMCTS, formerly Her Majesty's Court Service) has sufficient processes in place to negate the need for an independent inspectorate.

2 Do not legislate and reinstate HMICA - This would incur significant cost implications and not address the original problem that HMICA is no longer needed.

Will the policy be reviewed? It will not be reviewed. **If applicable, set review date:** /

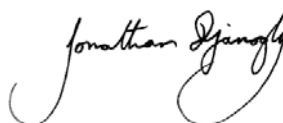
What is the basis for this review? Please select. **If applicable, set sunset clause date:** Month/Year

Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?	Not Applicable
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Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:



Date: 11 July 2011

Summary: Analysis and Evidence

Policy Option 1

Description: Formally Abolish HMICA

Price Base Year 2011	PV Base Year 2011	Time Period Years 1	Net Benefit (Present Value (PV)) (£m)		
			Low: Optional	High: Optional	Best Estimate: £0

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate	£0	£0	£0

Description and scale of key monetised costs by 'main affected groups'

There are no monetised costs associated with the formal closure as HMICA has already closed administratively. Costs and benefits of the administrative closure can be found later in this document

Other key non-monetised costs by 'main affected groups'

Some administrative costs associated with drafting the legislation. These are expected to be minimal.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate	£0	£0	£0

Description and scale of key monetised benefits by 'main affected groups'

Other key non-monetised benefits by 'main affected groups'

Legally closing HMICA will ensure that the statutory position reflects the administrative situation

Key assumptions/sensitivities/risks

Discount rate (%)

N/A

HMICA closed administratively in December 2010. Therefore the costs and benefits above relate only to the formal closure. Costs and benefits of the administrative closure can be found later in this document.

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs: £0	Benefits: £0	Net: £0	No	NA

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?			England and Wales		
From what date will the policy be implemented?			31/12/2010		
Which organisation(s) will enforce the policy?			N/A		
What is the annual change in enforcement cost (£m)?			N/A		
Does enforcement comply with Hampton principles?			Yes		
Does implementation go beyond minimum EU requirements?			N/A		
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded: N/Q	Non-traded: N/Q	
Does the proposal have an impact on competition?			No		
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?			Costs: N/A	Benefits: N/A	
Distribution of annual cost (%) by organisation size (excl. Transition) (Constant Price)	Micro	< 20	Small	Medium	Large
Are any of these organisations exempt?	No	No	No	No	No

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on...?	Impact	Page ref within IA
Statutory equality duties ¹ Statutory Equality Duties Impact Test guidance	No	14
Economic impacts		
Competition Competition Assessment Impact Test guidance	No	11
Small firms Small Firms Impact Test guidance	No	11
Environmental impacts		
Greenhouse gas assessment Greenhouse Gas Assessment Impact Test guidance	No	11
Wider environmental issues Wider Environmental Issues Impact Test guidance	No	11
Social impacts		
Health and well-being Health and Well-being Impact Test guidance	No	11
Human rights Human Rights Impact Test guidance	No	12
Justice system Justice Impact Test guidance	No	12
Rural proofing Rural Proofing Impact Test guidance	No	12
Sustainable development Sustainable Development Impact Test guidance	Yes	12

¹ Public bodies including Whitehall departments are required to consider the impact of their policies and measures on race, disability and gender. It is intended to extend this consideration requirement under the Equality Act 2010 to cover age, sexual orientation, religion or belief and gender reassignment from April 2011 (to Great Britain only). The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Summary: Analysis and Evidence

Policy Option 2

Description:

Do not legislate and reinstate HMICA

Price Base Year N/A	PV Base Year N/A	Time Period Years N/A	Net Benefit (Present Value (PV)) (£m)		
			Low: Optional	High: Optional	Best Estimate: N/A

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate	Not Quantified	Not Quantified	Not Quantified

Description and scale of key monetised costs by 'main affected groups'

Other key non-monetised costs by 'main affected groups'

Reinstating HMICA would involve recruiting and paying for staff, renegotiating office space and contracts. These costs have not been quantified. If HMICA's remit was to remain the same, an annual budget of around £2m could be expected. However, If this option was adopted more work would be required to finalise the remit and expenditure of HMICA.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate	Not Quantified	Not Quantified	Not Quantified

Description and scale of key monetised benefits by 'main affected groups'

Other key non-monetised benefits by 'main affected groups'

If HMICA was re-opened new staff would be required, these staff may benefit from higher wages relative to their current employment.

Key assumptions/sensitivities/risks

Discount rate (%)

N/A

Direct impact on business (Equivalent Annual) £m):			In scope of OIOO?	Measure qualifies as
Costs: 0	Benefits: 0	Net: 0	No	NA

Evidence Base (for summary sheets) – Notes

Use this space to set out the relevant references, evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Please fill in **References** section.

References

Include the links to relevant legislation and publications, such as public impact assessments of earlier stages (e.g. Consultation, Final, Enactment) and those of the matching IN or OUTs measures.

No.	Legislation or publication
1	<u>Public Bodies Bill</u>
2	Courts Act 2003
3	Police & Justice Act 2006
4	Coroners & Justice Act 2009

+ Add another row

Evidence Base

Ensure that the information in this section provides clear evidence of the information provided in the summary pages of this form (recommended maximum of 30 pages). Complete the **Annual profile of monetised costs and benefits** (transition and recurring) below over the life of the preferred policy (use the spreadsheet attached if the period is longer than 10 years).

The spreadsheet also contains an emission changes table that you will need to fill in if your measure has an impact on greenhouse gas emissions.

Annual profile of monetised costs and benefits* - (£m) constant prices

	Y ₀	Y ₁	Y ₂	Y ₃	Y ₄	Y ₅	Y ₆	Y ₇	Y ₈	Y ₉
Transition costs										
Annual recurring cost										
Total annual costs										
Transition benefits										
Annual recurring benefits										
Total annual benefits										

* For non-monetised benefits please see summary pages and main evidence base section

Evidence Base (for summary sheets)

1. Introduction

HMICA has been in existence since 2005. HMICA's predecessor was HM Magistrates' Courts Service Inspectorate, which was set up to inspect administration in the Magistrates' Courts, before Magistrates' Courts became part of the national Her Majesty's Courts Service (now HMCTS).

HMICA has a statutory responsibility under the Courts Act 2003 '*to inspect and report to the Lord Chancellor on the system that supports the carrying on of the business of the courts (Crown, county and magistrates)*'. It also has a statutory duty to carry out joint inspection (with the other criminal justice inspectorates) of the criminal justice system (Police & Justice Act 2006) and a new statutory responsibility under the Coroners and Justice Act 2009 for inspection of the Coroners Service.

On 7 December 2009, the then Prime Minister announced the government's intention to abolish HMICA. The announcement was made as part of the *Putting the Frontline First: Smarter Government* paper.

In 2010 the Cabinet Office led a review of all Arm's Length Bodies across government in order to increase the transparency and accountability of public bodies and to reduce their number and cost. All bodies were tested under three criteria – whether it needs to perform a technical function, act independently to establish facts or be politically impartial. HMICA was tested under these criteria, and not deemed to meet any of these tests, which reaffirmed the decision made by the former administration.

HMICA closed administratively on 31 December 2010. This decision was made, with the full agreement of the Inspectorate's senior management team, as the best approach in the interests of staff. Following the original announcement to abolish, a number of staff began to leave the Inspectorate, and it became increasingly difficult for HMICA to plan their inspection work, including their joint inspection activity. It therefore became ever more difficult to provide remaining staff with meaningful work. A firm closure date enabled staff to be given priority consideration for redeployment within the MoJ and wider civil service, and allowed the Inspectorate to implement a formal closure plan.

The conventional economic approach to government intervention to resolve a problem is based on efficiency or equity arguments. The Government may consider intervening if there are strong enough failures in the way markets operate (e.g. monopolies overcharging consumers) or if there are strong enough failures in existing government interventions (e.g. waste generated by misdirected rules). In both cases the proposed new intervention itself should avoid creating a further set of disproportionate costs and distortions. The Government may also intervene for equity (fairness) and redistributive reasons (e.g. to reallocated goods and services to the more needy groups in society).

In this case Government has intervened for efficiency reasons. The functions of the HMICA are no longer necessary. Therefore the resources used by the HMICA could be re-distributed to other projects or reduce the budget deficit.

Groups that are affected by the proposal are as follows:

- Staff of HM Inspectorate of Court Administration
- HMCTS
- HM Inspectorate of Prisons
- HM Inspectorate of Probation
- HM Inspectorate of CPS

- HM Inspectorate of Constabulary
- Court users

2. Costs and Benefits

This Impact Assessment identifies both monetised and non-monetised impacts on individuals, groups and businesses in the UK, with the aim of understanding what the overall impact to society might be from implementing these options. The costs and benefits of each option are compared to the do nothing option. Impact Assessments place a strong emphasis on valuing the costs and benefits in monetary terms (including estimating the value of goods and services that are not traded). However there are important aspects that cannot sensibly be monetised. These might include how the proposal impacts differently on particular groups of society or changes in equity and fairness, either positive or negative.

Base Case / Option 0 – Do Nothing

HM Inspectorate of Court Administration carried out independent inspections of HM Courts Service. These included both thematic inspections across the courts system and inspections focusing on specific geographic areas or individual courts. HMICA also contributed to the Criminal Justice Joint Inspection programme (which involves inspections on a thematic basis, looking at end to end processes in the criminal justice system). The Coroners and Justice Act 2009 also includes a statutory duty for HMICA to carry out inspections of the coroners service, although this duty did not commence. The Inspectorate's full complement of staff was 36 and its yearly budget was in the region of £2m.

The intention to abolish HMICA was announced in December 2009. During 2010, a number of staff left and were not replaced and the Inspectorate consequently gradually wound down its inspection programme. HMICA closed administratively on 31 December 2010.

If we do not legislate, HMICA will be left on statute, but would not be operational. It would be preferable for the statutory position to be amended to reflect the administrative practicalities – if the body is administratively closed; the legislative provisions are superfluous and for clarity ought to be repealed.

Option 1 – Formally abolish HMICA

The landscape in which HMICA operated has changed considerably since its inception in 2005. HMCTS now has robust audit methods and management information processes in place, which negates the need for independent inspection. HMCTS is also subject to external audit by the NAO, which can duplicate the work of HMICA.

It has been concluded that, whilst it is important to provide assurance that the systems within HMCTS are robust and effective it is not necessary for purely administrative systems to be subject to inspection by an independent body. We need to focus resources on delivering frontline services.

The Government remains committed to joint inspection of the criminal justice system. It is intended that functions will be transferred from HMICA to the other criminal justice Inspectorates to enable future joint criminal justice inspections to include inspection of HMCTS. This will be for the purposes of end to end inspection only (for example, tracking categories of cases from initial arrest to charge, court appearance, court result and rehabilitation or custody). HMCTS continues to support the cross criminal justice system, and the CJS inspectors have committed to consulting HMCTS on future inspection programmes to ensure that the right links can be made

HMICA has already closed administratively. Therefore, the majority of the costs and benefits associated with the closure have already been realised without formal closure. In the case of HMICA the Public Bodies Bill formalises a decision that has already been made. As such, it has minimal costs associated with it. These are detailed below.

Costs associated with Option 1.

There will be some administrative costs associated with drafting the legislation. These are expected to be minimal.

Benefits associated with Option 1

Legally closing HMICA will enable the statutory position to reflect the actuality that HMICA is no longer operational.

For information, in the following section we have provided costs and benefits associated with the administrative closure, which have either already been incurred or are likely to occur in the future as a result of HMICA's administrative closure – and would do so under either Option 0 or 1.

Costs of the administrative closure

Ministry of Justice

The majority of HMICA staff have been re-deployed into other posts within the MoJ and wider civil service. Staff were offered the opportunity to leave the MoJ on a voluntary exit scheme or on voluntary redundancy terms. The final cost of exits/redundancy is estimated to be in the region of £500k.

All staff remaining after the administrative closure were temporarily placed in MoJ and wider government offices whilst seeking alternative deployment. Additional funding was provided by MoJ following the end of the financial year in order to continue to pay for these staff. It is estimated that for the first Quarter of 2011-12 this will have incurred a cost of £70k. There may be some further costs involved after Quarter 1 this would be a maximum of around £25k.

No additional staff were hired to work on the administrative closure and there were no additional monetised costs.

Total staff costs could therefore be a maximum of £600k

HM Inspectorate of Prisons has taken on responsibility for ensuring that court custody areas are inspected in accordance with the Optional Protocol to the Prevention Against Torture. Joint inspections of the criminal justice system will continue to be carried out, with the remaining Inspectorates liaising with HMCTS on inspecting aspects of the courts for the purpose of joint thematic inspections. MoJ has provided additional funds to HM Inspectorate of Prisons of approximately £230k pa for this.

HMICA Staff

Those staff who have chosen to leave the department may suffer some reduction in income if they are unemployed or take lower-paid jobs; however, it is not possible to quantify this.

Government

Staff who have left the department may be eligible to claim unemployment benefits and other benefits. For the reasons mentioned above we have not quantified this. No additional costs to the Courts, Probation, Prisons, Legal Aid and Crown Prosecution Service are anticipated

Small scale suppliers

A number of small scale suppliers to HMICA may be affected by a loss in revenue (although these only occur on an ad hoc basis and most office supplies are provided through central MoJ contracts)

HMCTS

HMCTS will no longer be subject to independent inspection. Instead it will rely on its own internal systems to ensure there are checks on administrative processes and appropriate risk management is in place.

Lease Holder

The lease of accommodation in Leeds will come to an end, thereby potentially reducing the long-term rental income to the owner, if the department does not renew the lease for another area of the business.

Benefits associated with the administrative closure

Savings (Benefits) to MoJ

MoJ

Based on the original annual budget for 2010-11, HMICA cost approximately £2m a year to run. As HMICA closed administratively earlier than originally planned its 2010-11 outturn was £1.2m. As a result of closure MoJ will no longer incur these costs¹.

HMICA's budget covers payroll, travel & subsistence, training and development and other administrative costs (catering, printing and publishing, office supplies, postage).

IT, accounting and payroll services are provided centrally from MoJ. We have assumed no savings as the amount would be negligible.

HMICA will no longer require their office in Leeds, rental for which is £165k p.a. This saving may not be realised immediately. It is hoped that an alternative office can be moved to HMICA's location (as there is not a lease break until 2012). Until this is confirmed the extent of the saving cannot be known.

Net Impact of Option 1

Legally closing HMICA will enable the statutory position to reflect the actuality that HMICA is no longer operational and will incur only minor administrative costs.

Option 2 – Do not legislate and re-establish HMICA

This option considers a situation where legislation is not passed to abolish HMICA and a decision is taken to re-establish it as an operational Inspectorate. As the Inspectorate has now been closed administratively, this option would require it to be re-opened and new staff to be employed.

Costs of Option 2

MoJ

¹ In the June 2010 emergency budget, upon which the Spending Review was based, HMICA's 2010-11 budget was reduced to £1.6m, to take account of early closure.

This option would involve reinstating the Inspectorate, which would include recruiting a full body of staff, re-negotiating on office space, negotiating new contracts on office supplies and equipment. These costs have not been quantified.

The MoJ would fund the HMICA if it was re-established. Assuming that the functions are the same as they were before closure we would expect the budget to be approximately the same; roughly £2m per annum. However, if HMICA were to be re-opened its remit and budget would need to be reviewed and so this may change.

Benefits of Option 2

HMICA Staff

A reversal of the decision would be too late to have a positive impact on HMICA's former staff, as most have found alternative employment or chosen to exit the department. However new staff would be employed and they may benefit from higher wages relative to their current employment.

Criminal Justice Inspectorates

Other Criminal Justice Inspectorates would no longer need to take on responsibility for inspection of HMCTS during joint inspections nor HM Inspectorate of Prisons take on responsibility for inspection of court cells.

Summary of Options

Option 1 is preferred as it meets Government objectives to increase the transparency and accountability of public bodies and to reduce their number and costs. HMICA does not meet any of the criteria set out for the retention of ALBs

3. Specific Impact Tests

Equality Impact Assessment (EIA) attached as an Annex

Competition Assessment

The impact is not significant on competition. A small number of small-scale suppliers to HMICA may be affected by a loss in revenue.

This proposal does not:

- Directly limit the number or range of suppliers (or providers)
- Indirectly limit the number or range of suppliers (e.g. by altering demand)
- Limit the ability of suppliers to compete;
- Limit suppliers' incentives to compete vigorously.

Small Firms Impact Test

The impact is not significant on small firms as HMICA is public sector focused. A small number of small-scale suppliers may be affected by a loss in revenue. The proposals do not impose additional costs on small businesses.

Carbon Assessment

The impact on the emission of greenhouse gases is negligible. There may be a reduction in energy use as the office spaces in London and Leeds will not be used for HMICA work. HMICA Inspectors will also no longer travel to locations around England and Wales carrying out their inspection work. People may have to travel more if they find alternative work that is further away but this is unknown.

Other Environment

This is not broadly applicable as the policy will not:

- lead to a change in the financial costs or environmental and health impacts of waste management;
- impact significantly on air quality;
- involve any material change to the appearance of the landscape or townscape;
- change the degree of water pollution; levels of abstraction of water; exposure to flood risk;
- disturb or enhance habitat or wildlife;
- affect the number of people exposed to noise or the levels of exposure.

Health Impact Assessment

The policy will not have a significant impact on human health. The policy may affect in the short term the health of those 24 staff directly affected by the decision to close HMICA. Therefore there is unlikely to be a significant demand on health and social care services.

Human Rights

The closure of HMICA will result in an alternative proposal being required for compliance with the Optional Protocol to the UN Convention against Torture (OPCAT). It is proposed that HM Inspectorate of Prisons will take on this responsibility.

Justice Impact Test

There is no impact on Legal Aid or on the wider justice system (e.g. courts and tribunals, prisons and offender management). As detailed under Option 1 of the IA, it was concluded that HMICA's role in carrying out independent inspection was not needed, given the robust systems for assurance that now exist within HMCTS.

Rural proofing

This policy is unlikely to have a different impact in rural areas, because HMICA is not a direct provider of services to the public: it provides advice to ministers/ departments and officials.

Sustainable Development

The Government has committed to five principles of sustainable development:

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance;
- Using sound science responsibly.

This proposal supports the principles of ensuring a just society; achieving a sustainable economy and promoting good governance.

Annexes

Annex 1: Post Implementation Review (PIR) Plan

Basis of the review:
Review objective:
Review approach and rationale:
Baseline:
Success criteria:
Monitoring information arrangements:
Reasons for not planning a review: There are currently no plans for an internal review. The normal process would be for Select Committees to scrutinise the legislation within three to five years.

Annex 2: Equality Impact Assessment Initial Screening – Relevance to Equality Duties

The EIA should be used to identify likely impacts on:

- disability
- race
- sex
- gender reassignment
- age
- religion or belief
- sexual orientation
- pregnancy and maternity
- caring responsibilities (usually only for HR policies and change management processes such as back offices)

- 1 Name of the proposed new or changed legislation, policy, strategy, project or service being assessed.

Abolition of HM Inspectorate of Court Administration (HMICA) as provided for in the Public Bodies Bill.

- 2 Individual Officer(s) & unit responsible for completing the Equality Impact Assessment.

Elinor Howard, Head of Sponsorship, Arm's Length Bodies (ALB) Governance Division

- 3 What is the main aim or purpose of the proposed new or changed legislation, policy, strategy, project or service and what are the intended outcomes?

Aims/objectives	Outcomes
<p>The Government's reforms of public bodies will increase accountability, remove duplication and streamline the public bodies landscape. The Public Bodies Bill provides the legislative basis for reform but does not itself enact any changes. These will be made through secondary legislation.</p>	<p>Arms Length Bodies that are retained are transparent, accountable and provide value for money. Increased ministerial accountability relating to functions carried out on behalf of the state; elimination of duplication and reduced waste; fewer public bodies and reduced costs. Those ALBs that are no longer required or should operate in a different way are brought to a close or change their business model to support ministerial priorities.</p>

- 4 What existing sources of information will you use to help you identify the likely equality impacts on different groups of people?

HMICA is now closed and the majority of staff have found alternative posts. There are only two administrative staff remaining, for whom the department is seeking alternative employment in the Ministry of Justice or the wider civil service. Due to the small number of staff the department is not providing a breakdown in terms of protected characteristics but will ensure that all staff will be treated in

accordance with the department's internal equality and diversity principles including the departmental organisational change framework.

- 5 Are there gaps in information that make it difficult or impossible to form an opinion on how your proposals might affect different groups of people. If so what are the gaps in the information and how and when do you plan to collect additional information?

As explained above, no breakdown in terms of staff is provided. In terms of the impact on court users, HMICA did not directly provide a service to court users, however its role did have an indirect impact through the assurance role it carried out on administrative processes. This assurance will be provided by internal processes within Her Majesty's Courts and Tribunals Service, as well as continued scrutiny through National Audit Office studies, internal audit and occasional independent reports. There will also be some functions transferred to other criminal justice inspectorates, namely responsibility for inspection of the courts for the purpose of joint thematic inspections of the criminal justice system, and for the inspection of court custody areas. Due to the nature of HMICA's functions, it is likely to be very difficult reliably to assess any indirect impact on court users and the impact is likely to be too diffuse to be measurable.

- 6 Name of Senior Manager and date approved

Name (must be grade 5 or above): Pat Lloyd

Department: ALB Governance Division

Date: 23 June 2011