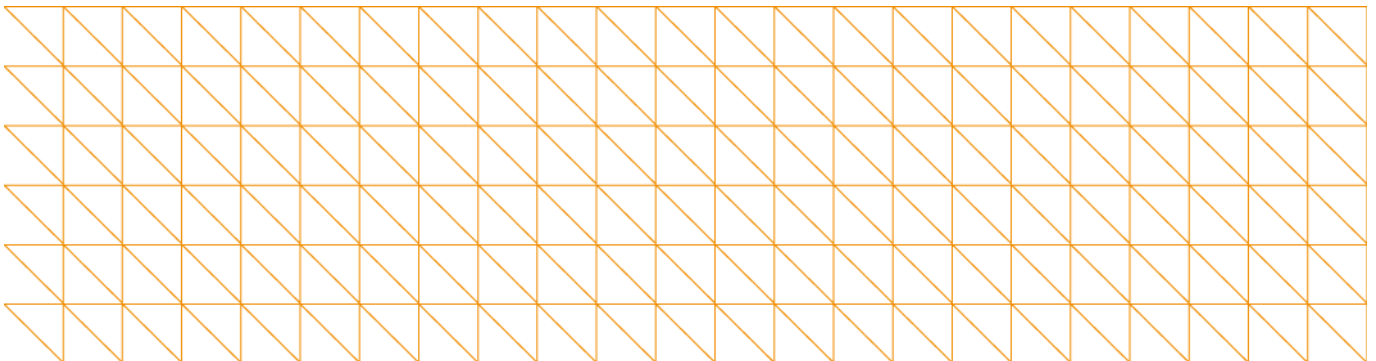




The new remand framework for children: Allocation of new burdens funding to local authorities

Response to Consultation

This response is published on 25 February 2013





Ministry of
JUSTICE



Youth Justice Board
Bwrdd Cyfiawnder Ieuenctid

The new remand framework for children: Allocation of new burdens funding to local authorities

Response to consultation carried out by the Ministry of Justice and the Youth Justice Board for England and Wales. This information is also available on the Ministry of Justice website at www.justice.gov.uk

About this consultation

To: Local authorities
Youth Offending Teams
Other stakeholders with an interest in youth justice issues

Duration: From 21 September 2012 to 16 November 2012

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Response to the consultation by the Ministry of Justice and the Youth Justice Board for England and Wales

1. The consultation paper 'The new remand framework for children: allocation of new burdens funding to local authorities' was issued on 21 September 2012. The deadline for responses was 16 November 2012. A total of 107 responses have been considered. Feedback was also obtained from a series of nine engagement events with stakeholders during October and November. In total these events were attended by over 400 people.
2. Please see **Annex 1** for a summary of the responses to the consultation paper, **Annex 2** for public sector equality duties and **Annex 3** for a list of respondents to the consultation exercise.
3. The responses we have received have not led us to alter our overall approach to the allocation of new burdens funding and the recovery of the costs of remands to youth detention accommodation. In summary for the year 2013/14:
 - We intend to distribute funding to meet the costs of remands to under-18 young offender institutions on the basis of 3 year historic data on secure remand bed nights.
 - There will be no transfer of funding to meet the costs of remands to secure children's homes and secure training centres.
 - The cost of remands to youth detention accommodation will be recovered on the basis of sector prices.
 - We do not intend to establish a central budget for 'spike events'.
 - The Youth Justice Board will continue to meet the costs of journeys to and from under-18 young offender institutions.
 - The Youth Justice Board will meet the costs of journeys to and from secure children's homes and secure training centres, top slicing these costs from the budgets to be transferred to local authorities.
 - We intend to distribute looked after child funding on the same basis as funding to meet the cost of remands to young offender institutions (although see paragraph 16 below).

4. However, there will be changes to the overall budget transferred, the distribution of that funding amongst local authorities and the sector prices. These changes, details of which are set out from paragraph 6 onwards, are being made as a result of:
 - Responses to the consultation exercise and feedback from the engagement events;
 - Recently completed work to resolve data discrepancies on bed night usage between the data held by the Youth Justice Board and data held by local authorities;
 - The availability of more recent data; and
 - Ongoing work to draft the secondary legislation required to operate the new provisions.
5. We will review our modelling and may make changes to the way we calculate the budget to be transferred in 2014/15.

Youth detention accommodation - the budget for remands to under-18 young offender institutions

6. The consultation paper indicated that £21.9m in each of the years 2013/14 and 2014/15 would be distributed amongst local authorities. This figure was calculated by multiplying the under-18 young offender institution sector price (£173) by the total number of remand bed nights in under-18 young offender institutions for the year 2011/12 (149,200 bed nights) and applying a 15% reduction to take account of the anticipated impact of the new remand framework. All three of these variables have changed.

Under-18 young offender institution sector price

7. We currently expect this sector price to be £171 between April and June 2013 and £160 from July 2013 to March 2014 (due to the planned decommissioning of Ashfield YOI) NB: This is subject to completion of negotiations with SERCO. We will consider the implications for the sector price and the budget if decommissioning does not take place to this timetable. Please see paragraph 11 below for further details on how this has been calculated.

Number of bed nights

8. The recently completed data verification exercise has had an impact on the total number of bed nights (as has the removal of the “plus one” methodology). The total number of bed nights for the purposes of this calculation is now 145,702. There have also been amendments to the distribution of those bed nights between local authorities and this will lead to changes to the allocation of funding to individual local authorities.

Impact of the new remand framework/Population adjustment for 2012/13

9. Recent population data shows a significant and sustained reduction in the number of children on remanded in under-18 YOIs. A YOI remand population adjustment of -26%¹ has therefore been applied to take account of this reduction. However, a reduction to take account of the new remand framework will not also be applied. It is possible that the fall in the population may have focused on the shorter remand periods for the less serious offences. If this is the case, it is likely to have reduced the potential impact of the new remand framework (introduced at the beginning of December) as the children who would be impacted by the test have potentially been diverted by improvements in youth offending team practice.

The revised budget

10. We currently anticipate that the budget for remands to under-18 young offender institutions will be £17.5million for 2013/14. We will monitor the impact of the new remand framework and will take account of this when we calculate the 2014/15 budget.

Youth detention accommodation - recovery of costs

11. The sector prices included in the consultation paper were calculated by taking into account the total number of beds that could be used for remand purposes in each establishment. In some establishments this included all beds, in others (specifically some STCs) this included only beds purchased for remand purposes. We have decided instead to calculate sector prices with reference to the average over a three year period of the number of beds occupied for remand purposes each month in each institution. In addition assumptions on VAT were made which are not in line with the current procedures. These figures also take account of decommissioning plans. There is ongoing work to refine the calculations, but anticipated sector prices from April 2013 are set out in the table below.

¹ This is the reduction in the remand population in under-18 young offender institutions seen when comparing April 2011 to March 2012 with April to November 2012 (the most recent period for which information is available).

Sector	Price as set out in consultation paper	Revised price	Main reasons for change
Under-18 young offender institutions	£173	£171 (April to June 2013) £160 (July 2013 to March 2014)	New calculation method, addition of VAT for private sector young offender institutions and decommissioning of Ashfield from July.
Secure training centres	£607	£626	New calculation method.
Secure children's homes	£577	£580	New calculation method. VAT is <u>not</u> an issue for this sector.

12. Local authorities asked for transparency in the calculation of costs and a clear indication of the circumstances in which costs can and will be recovered. We will provide this alongside the statutory instrument set to come into force in April 2013.

Remand journeys to and from youth detention accommodation

13. We believe that the method used to estimate the overall costs of journeys to and from secure children's homes and secure training centres is currently the best model available. We intend to use this model for the year 2013/14. However we are currently updating the model to take account of more recent data and VAT will be included. In the meantime we have offset the total amount by an indicative figure of £1.3million. This indicative figure has been attributed to local authorities differently, taking account of the estimated number of hearings that children from each local authority will attend and the distances they will have to travel.

14. As part of the process of updating the model a reduction of 10% will be applied to reflect the estimated impact of the new remand framework. This has been revised from the 15% figure used in the consultation document. That figure modelled the impact of the remand framework on remand episodes and, following feedback from practitioners, we have modelled the impact on bed nights.
15. We will be able to monitor the use of the contract during the year and will look to use something that better reflects actual use for 2014/15.

Looked after children

16. The consultation paper indicated that £2.7million would be made available in 2013/14 to meet the costs of extending looked after child status. The variables used in the model have been updated. The model now uses verified remand episodes for 2011/12 and unit costs from the Personal Social Services Research Unit report, *Unit Costs of Health and Social Care 2012*. A YOI remand population adjustment of -13%² has been applied. However, a reduction to take account of the new remand framework will not also be applied (see paragraph 9 above for further information).
17. We are confident that, with one exception, the modelling on looked after child costs which occur while the child is in custody is robust. Some respondents raised concerns that travel costs had not been included in the model (the regulations require face to face meetings with the child). Such costs are particularly relevant to Wales and the South West of England. We have undertaken some further modelling and believe that including staff travel costs would add £0.4million to the costs. This will be distributed taking account of the number of visits and the distances people will have to travel to attend meetings with remanded children.
18. We accept that modelling for leaving care services is less robust. However, the best available data sources have been used. This has been to take account of more recent figures.

The total revised budget

19. The total revised budget is £20.2million. We intend to monitor these new provisions and there may be a need for further remodelling for the 2014/15 budget.

² The actual reduction, when comparing the remand population in under-18 YOIs for 2012/13 (published data from April to November) with 2011/12, is 26%. Under the new remand framework we expect there to be fewer remand episodes, but it is possible that those episodes will be the longer ones. We have therefore applied an optimism bias of 50% to the population reduction.

Public Sector Equality Duties

20. We published an initial screening Equality Impact Assessment (EIA) alongside the consultation paper and have given further and careful consideration to the equalities implications of our proposals in light of the responses received. Please see **Annex 2** for a summary of the points raised and the MoJ/YJB response.

Annex 1 - summary of responses to the consultation exercise

Distribution of funding for remands to under-18 young offender institutions (Questions 1 and 2)

1. The consultation paper recommended that funding is distributed to local authorities on the basis of three year historic data.
2. 47% of respondents agreed with the proposal that distribution should be on the basis of historic usage. These respondents generally suggested that this was a fair and reasonable approach to take in the short-term. However, concerns were raised about the accuracy of the data. There were also suggestions that the data should be averaged over longer time periods and that a rolling three year average should be used to distribute funding. Several respondents suggested that long-term use of historic data would not provide an incentive for areas to reduce unnecessary remands.
3. 41% of respondents disagreed with the proposal, commenting that it rewarded poor performance and 'penalised' local authorities where reductions had already been achieved. However some of the respondents who disagreed with the proposed distribution formula went on to suggest that historic data should be used, but over a longer time frame. Part of this was to alleviate the concern that the local authorities in which disturbances occurred during August 2011 would receive an increased allocation as a result of that event.
4. The suggestions for alternatives tended to focus on an allocation based on the effective practice grant formula (ie taking account of the size of the 10-17 population and deprivation factors). The local authorities proposing this option would receive a substantially greater allocation than one based on historic data. Others suggested developing a formula which:
 - Recognised the work of some areas to reduce secure remands;
 - Included a measure on the seriousness of offending;
 - Included recorded crime levels;
 - Addressed rurality; and/or
 - Took account of the index of Child Wellbeing.
5. Feedback from the engagement events was generally in line with written responses to the consultation exercise.

The proposal relating to the costs of remands to secure children's homes and secure training centres (Question 3)

6. The consultation paper made it clear that there were no plans to transfer funding to local authorities to meet the costs of remands to secure children's homes or secure training centres on the basis that this was not a new burden.
7. The vast majority of respondents disagreed with the proposed approach. Views expressed by delegates at the engagement events also reinforced the strength of feeling amongst stakeholders on this issue. Concerns were expressed about the pressure this would place on local authorities at a time of significant pressure on all budgets. For example, the cost of a long-term remand for a single child placed in a secure children's home or secure training centre could cost as much as the young offender institution budget a local authority receives. It was suggested that, as a result, there would be limited or no scope to invest in alternatives to custody and little appetite to risk any such investment. There were also suggestions that this proposal would put pressure on local authorities to down play vulnerability so that a child on remand could be placed in a cheaper sector.
8. There was some acceptance that the original agreement, whereby the Youth Justice Board defray $\frac{2}{3}$ of the costs, was established as a short-term arrangement. These respondents tended to suggest transitional arrangements should be implemented. However, there was also concern that information on this proposal had been confirmed too late in the day reducing the ability to analyse fully the impact of the changes and extra costs.

Recovery of costs using "sector prices" (Question 4)

9. The consultation paper recommended that costs are recovered on the basis of average prices for each of the three sectors ("sector prices").
10. The vast majority of respondents to the consultation paper and delegates at the engagement events thought that this was a fair and reasonable way to recover costs and would help with financial planning. However, respondents wanted clarity and transparency in the calculation of these costs. Some, in particular, indicated that they could not properly comment on the proposals without this information. A few respondents felt that a single average price would remove the potential risk of placement decisions being influenced by different costs.

11. A number of other points were made, including:

- Requests for information on what would happen to any over-recovery of costs by the Youth Justice Board that might arise;
- The expectation that local authorities should be involved in the commissioning process in future to ensure value for money;
- Some questioning of the move from current arrangements of charging actual prices (for the 1/3 costs for secure children's homes and secure training centres currently met by local authorities); and
- Requests for clarification in relation to delivery of service across the estate and the potential impact of uplifts in prices.

Spike events (Questions 5 and 6)

12. The consultation paper proposed that there should not be a central budget for spike events.

13. 35% of respondents agreed that there should not be a central budget for spike events. However, this was generally on the basis that a budget for spike event would be top sliced from the funding available to local authorities which they did not believe was appropriate.

14. 54% of respondent suggested that there should be a central budget, although most of these indicated that this should be a separate budget (possibly utilising the savings the government would achieve by not transferring funding for remands to secure children's homes and secure training centres, or the 15% reduction due to the new remand framework). Some argued that the provision of a budget for spike events would not be a disincentive to reduce secure remands. They suggested instead that such a safety net would make it more likely that local authorities would invest in alternatives to secure remands.

15. A number of respondents suggested that central funding should go wider than 'spike events' including, for example, children charged with serious offences who are likely to be detained on secure remand for longer than 6 weeks as a result of appearances in Crown Court, foreign national children and children being trafficked and used as part of organised crime.

Transport (Question 7 and 8)

16. The consultation paper recommended that the costs of journeys to and from under-18 young offender institutions should continue to be met by the Youth Justice Board. The paper also recommended that the costs of journeys to and from secure children's homes and secure training centres should also be met by the Youth Justice Board. The costs of journeys to and from secure children's homes and secure training centres were previously met by local authorities. Therefore the paper recommend that these costs be top sliced from the funding to be transferred to local authorities.
17. The majority of respondents (63%) agreed that this was a pragmatic approach to take. However, while some indicated that it was acceptable to calculate the amount to be deducted from local authorities on the basis of historic bed night usage in the short term (as long as this data was accurate); others thought it should be based on actual costs.
18. Again many respondents indicated that they wanted to be involved in the commissioning process for transport to ensure they received value for money. They also expressed concerns about the quality of service, in particular, response times. The views of delegates at the engagement events were in lines with the written responses.

Looked after child (Questions 9 and 10)

19. The consultation paper recommended that funding should be distributed on the same basis as the distribution of funding for remands to under-18 young offender institutions.
20. Respondents to this question were fairly evenly split; with 40% agreeing and 41% disagreeing. Of the respondents who disagreed, many suggested that distribution should follow the recommendations they made in relation to questions 1 and 2 or reflect the number of children securely remanded rather than bed nights. The remainder of respondents did not answer this question.
21. The main concerns highlighted in the responses to these questions (and in feedback at the consultation events) related to the calculation of the overall budget and the late provision of guidance on the implications of extending looked after child to all children remanded to youth detention accommodation. On the calculation of the budget, the key issues raised were:

- Challenges on the estimated number of children who will become looked after including the expectation that the new remand framework will lead to a 15% reduction in numbers and the assumption that 25% of children in young offender institutions are already looked after;
 - Concerns that the budgets did not include travel costs for relevant staff visiting children in secure accommodation;
 - The lack of area cost differentials;
 - Concern that the calculation did not take account of the fact that, with the introduction of the new remand framework, the cohort that will become looked after will be 'at the more challenging end'; and
 - Suggestions that leaving care costs had been severely underestimated.
22. Many respondents asked for the model for calculating the overall looked after child funding pot to be revisited to address the concerns that they raised.

Equality impacts (Questions 11 and 12)

23. See **Annex 2** for details.

General comments

24. As well as answering the specific questions set out in the consultation paper. Respondents made general comments about the proposals. These included:
- Strong reservations by a large proportion of respondents about the assumption that the new remand framework will lead to a 15% reduction in the number of secure remands. It was suggested that it would be sensible to delay the transfer of funding for a year to see whether this reduction does actually take place. Or to delay the implementation of the 15% reduction for a year. A number of respondents also challenged the assumption that the 15% reduction would be seen evenly across England and Wales and whether this reduction could be applied to bed night data when it had been established on episode data.

- A suggestion that the overall secure remand budget should be calculated using average historic usage over three years, rather than on a single year.
- The suggestion by several respondents that funding needed to be ringfenced. It was also suggested that it would be helpful if the transfer of the funding came with the agreement that this funding could be carried over from year to year to assist making provision for this type of event, especially towards the end of the financial year.
- Requests for clarification of how frequently the delegated funding levels will be reviewed and what formula would be used in the future.
- Complaints that funding is not divided by local authority but by youth offending team – there are several youth offending teams that are cross-local authority partnerships.
- Questions about whether local authorities would be charged for the day of release. Respondents felt that this would be unfair. They suggested that young people who are securely remanded into custody will almost never be received before noon and will leave by 9 am on the day of release.
- Concerns that the presumption that alternatives to custody are cheaper (in the shorter term) and will save local authorities money may be flawed.
- A suggestion by a number of respondents that young people awaiting trial or sentence at Crown Court often choose not to make bail applications. It was suggested that some young people anticipating a custodial sentence may be advised that their time on secure remand will likely be taken into account by the Court. They suggested that this becomes 'proxy custody'. They asked that consideration be given to keeping the financial responsibility for all grave crime remands within central Government.

Annex 2 - public sector equality duties

1. We received and took account of 43 written responses to the consultation exercise that commented on equalities issues as well as gathering verbal feedback from participants in the regional engagement events.
2. Many of the responses received commented on equalities issues that were relevant to the equality impact assessments that accompanied the Green Paper *Breaking the Cycle* and the Legal Aid, Sentencing and Punishment of Offenders Bill rather than the consultation paper. These issues included: treating children remanded to youth detention accommodation as looked after; placement decisions; the suitability of existing youth detention accommodation for certain protected characteristics; and the policy of giving local authorities greater financial responsibility for secure remand.
3. A number of responses focused on the potential for disproportionate outcomes in relation to the proposals set out in the consultation paper. In particular for black and minority ethnic groups and those with disabilities, were the funding provided to local authorities not sufficient. Responses focused specifically on:
 - The proposal no longer to assist local authorities in meeting the costs of securely remanded children detained in secure children's homes and secure training centres; and
 - The level of funding needed to meet additional looked after child costs.
4. Other issues raised included:
 - A concern that the new Serco contract created an extreme disparity between the quality of service provided for those placed in secure children's homes/secure training centres and those placed in young offender institutions in terms of transport.
 - Concerns that the proposals might discourage the use of secure children's homes and secure training centres on the grounds of cost and that this may apply especially to older young people, 15-16 year old girls, and affect those with specific needs and vulnerabilities. Placement decisions would have a greater financial cost associated with them which may affect the quality of local authorities' vulnerability assessments and therefore lead to increased placements in young offender institutions.

- Other responses queried whether males would from now on be given equal treatment to females when placement decisions are made.
5. In respect of the proposal no longer to fund the costs of children detained on remand in secure children's homes and secure training centres we do not believe that this will lead to disproportionate outcomes because:
- Where remands to secure children's homes and secure training centres are necessary, they must be funded by law. In addition, local authorities must have regard to their own public sector equality duty when: developing practice changes; completing vulnerability assessments that will help inform the Youth Justice Board's placement decisions; and in making broader spending decisions in other areas.
 - We anticipate that there will be a reduction in the number of 12-17 year olds remanded to custody due to the changes to the youth remand framework and local authorities should bring about further reductions through practice changes. These reductions may help to offset the costs of children detained on remand in secure children's homes and secure training centres.
 - The Youth Justice Board's placement policy and steps taken to improve the quality of information provided by youth offending teams to some extent mitigate the risk that children might be placed inappropriately in young offender institutions rather than more expensive secure children's homes and secure training centres. For example:
 - The Youth Justice Board's guidance is clear that placement decisions should be made on the basis of age, risk, needs and individual circumstances rather than cost. The guidance to local authorities on completing the placement information form will, for example, state that it would not normally place any children aged 12-14, or girls aged 15 and 16 into young offender institutions. Furthermore the removal of the restrictions in law based on age and gender in respect of where children may be detained on remand will allow for 15 to 16 year old boys and 17 year old children to be placed in secure children's homes and secure training centres where this is appropriate.

- The Youth Justice Board's guidance to local authorities on completing the placement information form also seeks to improve the provision of information by youth offending teams to its placements service. It states that youth offending team staff completing the form must ensure that all relevant and current information regarding risks and needs of the child is captured in the form.

The risk, nevertheless, of inappropriate placement will be monitored carefully by the Youth Justice Board.

6. On funding for looked after children, we are confident that the modelling on costs for looked after children while in custody is robust. In addition we have now modelled the costs in respect of travel for staff and have included it in the allocation of funding to local authorities. The Ministry of Justice and the Youth Justice Board will monitor the funding provided over the course of the current Spending Review taking into account the public sector equality duty.
7. The new Serco transport contract provides a level of service that is generally commensurate with the age, greater needs and vulnerabilities of those placed in secure children's homes and secure training centres. There may be some 17 year olds with needs and vulnerabilities such that they may not be placed in a young offender institution and therefore the new contract will cater for them. We therefore believe that the differences between transport arrangements is reasonable for those placed in secure children's homes and secure training centres compared to those placed in young offender institutions.
8. We published an initial screening Equality Impact Assessment (EIA) alongside the consultation paper and have given further consideration to the equalities implications of our proposals in light of the responses received. There were no further equalities issues raised by respondents and we consider the proposals to be a proportionate means of achieving the legitimate aim of giving local authorities greater financial responsibility for the secure remand of children. A summary of the points raised is given at **Annex 1**.

Annex 3 - list of respondents to the consultation exercise

Action for Prisoners' Families

ADSS Cymru

Association of Directors of Children's Services/ Local Government Association

Association of YOT managers

Barnet Borough Council

Bath and North East Somerset YOT

Bedfordshire YOS

Birmingham YOS

Blackpool Youth Offending Team

Blaenau Gwent & Caerphilly YOS and Borough Councils

Bradford and District YOT

Brent YOS

Bridgend YOS

Bromley Borough Council

Buckinghamshire County Council

Cambridgeshire Youth Offending Service

Camden Borough Council

Cheshire West, Halton and Warrington YOS

Children's Commissioner for Wales

Children's Services, Worcestershire County Council

Cornwall & the Isles of Scilly Youth Offending Service

County Durham YOS

Coventry YOS

Croydon YOS

Cumbria County Council

Cumbria Youth Offending Service Management Board

Derby City YOS

Derbyshire YOS

Devon Youth Offending Service

Doncaster YOS

Ealing Borough Council

East Sussex Chief Officers Group

Enfield YOS

Essex Youth Offending Service

Gateshead YOS

Greater Manchester YOT managers

Gwynedd and Ynys Mon YJS /CS Partnership

Hampshire County Council, Children's Services

Haringey Children and Young People's Service

Herefordshire Council

Hertfordshire County Council

Hillingdon YOS

HMP & YOI Parc, Custodial & Detention Services, G4S Care & Justice Services

Islington Council

Kent Integrated Youth Services

Kirklees YOT

Lambeth Borough Council

Lancashire County Council

Leeds YOS

Leicester YOS

Leicestershire YOS

Lewisham Council

Lincolnshire YOS

Liverpool YOS

Local authority - Youth Offending Service

London Borough of Bexley

London Councils

London Probation Trust

Luton Borough Council

Luton Youth Offending Service

Manchester City Council

Medway YOT

Merton Borough Council

Milton Keynes YOT

Monmouthshire and Torfaen Youth Offending Service

Newcastle Youth Offending Team

Newcastle YOT

Newport YOS and City Council

Norfolk Youth Offending Team/Norfolk Children's Services

North East London Partnership

Northamptonshire Youth Offending Service

Northumberland County Council

Northumberland Youth Offending Service

Oldham YOS

Oxfordshire County Council; Children, Education & Families Directorate

Plymouth City Council

Portsmouth City Council

Prison Reform Trust

Reading Youth Offending Service/Reading Youth Justice Partnership
Management Board

Redbridge YOS

Rhondda Borough Council

Rotherham YOS

Sheffield Youth Justice Service

Solihull MBC

South Tees YOS

South Wales Police

Southampton YOS

Southwark Youth Offending Service

Staffordshire YOS

Standing Committee for Youth Justice

Suffolk Integrated Services and YOS

Sunderland YOS and City Council

Swindon YOT

Tameside YOT

Thurrock YOS

Vale of Glamorgan YOS

Wakefield YOT

Wandsworth Children Services

Warrington Borough Council

Warwickshire Youth Justice Service

Welsh Local Government Association

West Berkshire Youth Offending Team

Wigan YOT and Council

Wokingham Youth Offending Team

Halton Youth Offending Service

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