

# Impact Assessment, The Home Office

**Title:** Controls on possession of component parts of ammunition

**Date:** 5 August 2020

**IA No:** HO0356

**RPC Reference No:** N/A

**Stage:** Consultation

**Other departments or agencies:** Ministry of Justice

**Intervention:** Domestic

**Measure:** Primary legislation

**Enquiries:** Graham.Widdecombe@homeoffice.gov.uk

**RPC Opinion:** RPC Opinion Status

**Business Impact Target:** Non qualifying provision

## Cost of Preferred (or more likely) Option (in 2019 prices)

Net Present Social Value NPSV (£m)	-1.2	Business Net Present Value BNPV (£m)	0.0	Net cost to business per year EANDCB (£m)	0.0
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### What is the problem under consideration? Why is government intervention necessary?

Firearms crime rose by 33 per cent from 2014/15 to a peak in 2017/18 partly due to a rise in shotgun offences. It fell by 5 per cent between 2017/18 and 2019/20, however law enforcement bodies are concerned about ammunition being transferred to the criminal market by criminals who use component parts of ammunition to manufacture full rounds. Government intervention is required to alter legislative control measures.

### What are the policy objectives and the intended effects?

To prevent the unauthorised manufacture of ammunition through the assembly of component parts. The intended effect is a reduction in firearms-related crime and the associated societal damage it causes.

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

**Option 1** – Do nothing

**Option 2** – To make it an offence to possess component parts of ammunition with intent to manufacture unauthorised quantities of complete rounds of ammunition.

### Main assumptions/sensitivities and economic/analytical risks

**Discount rate (%)**

3.5

There is little data to support the estimate for the additional enforcement/offences that will be generated by the new restrictions. Currently this effect is assessed as being small, but given the lack of data, there is a risk that this is under-estimated and that costs to the CJS may be higher. Sensitivity analysis is used to test this, see section G.

**Will the policy be reviewed?** It will be reviewed. **If applicable, set review date:** 2023

*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:



3009 20

# Summary: Analysis & Evidence

# Policy Option 1

## Description:

### FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2019/20	PV Base	2019/20	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-0.6	High:	-2.5	Best:	-1.2	Best BNPV	0.0	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.6	0.6	0.1	0.0
High	0.0	2.5	2.5	0.3	0.0
Best Estimate	<b>0.0</b>	<b>1.2</b>	<b>1.2</b>	<b>0.1</b>	<b>0.0</b>

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

The cost (present value over 10 years) is expected to be between £0.6 and £2.5 million with a central estimate of £1.2 million. This mainly consists of criminal justice system (CJS) costs to enforce the new offences, with a central estimate of £1.1 million. Estimated enforcement costs to the police are between £0.1 to £0.4 million, with a central estimate of £0.2 million.

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

Any costs caused by the reduction in sales of ammunition component parts, from the proposed restrictions, have not been monetised due to a lack of data on whether this would occur. There may be costs to non-licensed individuals who would have previously used component parts in a legal way.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low					
High					
Best Estimate					

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

No benefits are monetised.

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

The intended benefit is a reduction in firearms crime. This has not been monetised due to lack of data on the extent to which these controls would reduce firearms crime. However, break-even analysis shows that one homicide or 117 robberies would need to be prevented over 10 years for the benefits to exceed the costs.

### BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	0.0	Benefit, £m	0.0	Net, £m	0.0					
Score for Business Impact Target (qualifying provisions only) £m:					N/A					
Is this measure likely to impact on trade and investment?					N					
Are any of these organisations in scope?			Micro	N	Small	N	Medium	N	Large	N
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)					Traded:	N/A	Non-Traded:	N/A		

### PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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# Evidence Base

## A. Strategic Overview

### A.1 Background

1. Law enforcement bodies have raised concerns about the availability of component parts of ammunition and how criminals use them to unlawfully manufacture full rounds of ammunition.
2. Only the main components of ammunition are already controlled (propellants and primers). The possession of propellants is controlled under the Explosives Regulations 2014 which require that, with certain exceptions, anyone wanting to acquire or keep explosives must hold an explosives certificate issued by the police. Primers are subject to control under section 35 of the Violent Crime Reduction Act 2006 which makes it an offence to sell or purchase primers, including empty cartridge cases incorporating primers, unless the purchaser is authorised to possess them – for example, by being a registered firearms dealer or by holding a firearm certificate authorising them to possess a firearm or ammunition of the relevant kind. It is an offence under section 1 of the Firearms Act 1968 to possess, purchase or acquire ammunition without holding a firearm certificate. It is an offence under section 5(2A) of the Firearms Act 1968 to unlawfully manufacture and supply prohibited ammunition. However, some component parts of ammunition, for example, the lead bullets and cases, are not controlled. The proposed change would be to make it an offence to possess these without a licence if it can be shown there is intent to use them to make ammunition.

### A.2 Groups Affected

**Law enforcement** – Police forces in England and Wales; Police Scotland; National Crime Agency.

**Criminal justice agencies** - Crown Prosecution Service; courts; HM Prison and Probation Service.

### A.3 Consultation

#### Public Consultation

3. The Government is consulting publicly on whether it should be made an offence to use component parts to assemble unauthorised quantities of ammunition as part of a wider consultation on firearms safety.
4. Relevant information will be sought from the consultation. This includes:
  - Whether the risks to public safety would be reduced by strengthening the controls.
  - Likely police and CJS impacts.

## **B. Rationale for intervention.**

5. **The problem: firearms offences are increasing, and evidence suggests that one source of ammunition to the illegal, criminal market is through the unlawful assembly of component parts**
6. Serious violence has increased since 2014/15. This includes firearms crime, which rose 33 per cent from 2014/15 to a peak in 2017/18. Firearms crime has fallen in the latest figures which shows a 4 per cent year-on-year reduction in firearms offences up to March 2020, and a 5 per cent reduction since 17/18, but is still up 26 per cent up since 14/15.<sup>1</sup> Shotgun-related crime accounts for 10 per cent of all firearm crime<sup>2</sup> and has risen 44 per cent between 2014/15 to 2019/20<sup>3</sup>.
7. **Legislation is needed as police have concerns that the current framework facilitates transfer of firearms material from the legal to the criminal marketplace.**
8. Law enforcement is concerned that the current legislative controls on ammunition are exploited by criminals through the manufacturing of ammunition from component parts
9. The legislative controls already in place do not prevent non-licensed individuals from holding certain component parts for ammunition. Through tightening the policy around component parts, it will become harder for non-certificate holders to make ammunition. This provides a strong rationale for the policy, as it will help prevent gun material entering the illicit market and fuelling further increases in gun crime.

## **C. Policy objective**

10. The policy objective is to reduce firearms crime by making it an offence to possess component parts of ammunition with intent to manufacture unauthorised complete rounds.

## **D. Options considered and implementation.**

11. **Option 1** - To take no action and maintain the current position.
12. **Option 2** – To make it an offence to possess component parts of ammunition with intent to manufacture unauthorised quantities of complete rounds of ammunition.
13. Option 2 is deemed to be the preferred option, but it is liable to change based on the consultation. The purpose of this Impact Assessment is to capture a range of possible outcomes regarding to this proposed policy.
14. This is a consultation stage IA . Subject to the outcome of the consultation, the measures set out in paragraph 5 may require primary legislation and will therefore be implemented when a suitable legislative vehicle becomes available, subject to parliamentary approval.

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<sup>1</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmarch2020>

<sup>2</sup> As above – table F2.

<sup>3</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/offencesinvolvingtheuseofweaponsdatatables> Table 2

## E. Appraisal.

### General assumptions and data

15. The best available data has been used for this Impact Assessment. Costings for the appraisal section are based on data given by gun trading experts and national crime statistics. These were used to provide figures for the number of ammunition related crimes and for the cost of crimes for homicides and robberies. This policy is appraised over a 10-year period in line with HM Treasury (2018) Green Book guidance. A social discount rate of 3.5 per cent is used to discount future values to give present values (PV) over the period. All costs and benefits are in 2020 present value base year and 2019 prices this is in order to remain consistent with current prices. Transition costs are assumed to occur in year 1 only. It is hoped that the consultation will provide further data and information to refine the estimates of costs and benefits presented here.
- It is assumed that the proposed restrictions on component parts do not cause a reduction in the size of the market, as the number of component parts used in the illegal manufacture of ammunition is estimated to be negligible compared to the number of legally held components. This assumption will be tested in the consultation. It is assumed that the new restrictions do not generate any additional police inspection activity because the police are already tasked with regular firearms inspections. There will, however, be additional time taken by police, and hence costs incurred to deal with the small number of additional offences (39) from people in breach of the new restrictions. This is expected to lead to an increase in police enforcement time costs. The number of new offences is estimated as follows:
  - In the three financial years between 2017/18 and 2019/20 there was an average of 1,577 Other Firearms Offences<sup>4</sup> annually. However, not all these offences are expected to relate specifically to ammunition. As there is no data to indicate how many of these relate to ammunition, a low, medium and high estimate is calculated assuming 12.5, 25 and 50 per cent<sup>5</sup> of the offences would relate to ammunition. This gives 197, 394 and 789 respectively. Assuming the new legislations will generate new offences equivalent to approximately 10 per cent of the current shotgun ammunition offences, this will result in a low, central, and high estimate of approximately 20, 39 and 79 offences a year<sup>6</sup>.
  - The increase in police time to deal with enforcing the additional offences is based upon a £38 hourly wage for the average officer, the number of offences, and the time taken for the police to deal with an offence. Further detail is set out in the Ongoing costs – Police section.
  - These offences will generate knock-on CJS costs (court hearings etc). It is assumed that CJS costs for additional offences are the same as a cost of a proxy offence<sup>7</sup>, 'illegal possession of an offensive weapon', £3,160. Sensitivity analysis around the number of new offences is shown in section G.

### COSTS

#### Transition costs

##### Police

16. It is expected that firearms licensing officers from each force will have to familiarise themselves with the legislative changes around component parts. It is assumed that each force has between two and

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<sup>4</sup> See Offense Code 81 in Home Office Counting Rules for Recorded Crime [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/822476/count-weapons-jul-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822476/count-weapons-jul-2019.pdf) and Police recorded crime Police Force area open data tables year ending March 2013 onwards. <https://www.gov.uk/government/statistics/police-recorded-crime-open-data-tables> Published 17<sup>th</sup> July 2020. 1,577 calculated by taking the average number of offences (1956 in 19/20, 1807 in 18/19, and 967 in 17/18).

<sup>5</sup> In the absence of data, it is assumed that as only 4 out of the 22 offences within classification 81 relate to ammunition, it is unlikely that over 50 per cent of the offences will relate to component parts of ammunition.

<sup>6</sup> Rounded to the nearest whole number.

<sup>7</sup> Possession of offensive weapons without lawful authority or reasonable excuse (Prevention of Crime Act, S.1).

eight firearms licensing officers. Familiarisation is again expected to take between 5 to 15 minutes. It is assumed that all familiarisation costs are accrued in the first year. The hourly wage of a junior police officer (Sergeant and below) is used as a proxy wage for the firearms licensing officers. Multiplying the approximate average hourly wage for the firearms licensing officers of £38<sup>8</sup> by the low number of licensers per force (2), the total number of police forces (43) and the low estimate for familiarisation time (5 minutes) gives a low time cost estimate of approximately £300 (PV over 10 years). Multiplying the approximate average hourly wage for the firearms licensing officers of £38, by the high number of licensers per force (8), the total number of police forces (43) and the high estimate for familiarisation time (15 minutes) gives a high time cost estimate of approximately £3,300 (PV over 10 years). Multiplying the approximate average hourly wage for the firearms licensing officers of £38, by the central number of licensers per force (5), the total number of police forces (43) and the central estimate for familiarisation time (10 minutes) gives a central-time cost estimate of approximately £1,400 in year 1 only.

## Ongoing costs

### Police

17. The additional offences as a result of this legislation are expected to lead to some additional enforcement costs for the police. As these are new offences, it is difficult to estimate how much police time they will require. Offences related to the storing of large quantities of ammunition which breach the explosives act have been used as a proxy in this impact assessment. Initial estimates suggest these offences take three to six hours to initially investigate and can require up to three hours travel time per case. As there would be additional time to review and action the reports too, nine hours is taken as the low estimate and it is estimated that the average offence will require 9 to 15 hours of police time (central-estimate 12 hours). This estimate will be refined throughout the consultation.
18. Multiplying the low estimate of 20 new offences per year by the low estimate for the time it takes a police force to investigate unlawful ammunition possession (9 hours) and the hourly wage of a junior police officer cost (£38) gives an annual cost of £6,700, and a £58,000 present value over 10 years. Multiplying the central estimate of 39 new offences per year by the central-estimate for the time it takes a police force to investigate unlawful ammunition possession (12 hours) and the hourly wage of a junior police officer cost (£38) gives an annual cost of £18,000, and a £0.2 million present value over 10 years. Multiplying the high estimate of 79 new offences per year by the high-estimate for the time it takes a police force to investigate unlawful ammunition possession (15 hours) and the hourly wage of a junior police officer cost (£38) gives an annual cost of £44,900, and a £0.4 million present value over 10 years.

### Criminal Justice System (CJS)

19. If the new legislation proposed under Option 2 results in 39 new offences per year (central-estimate), then CJS costs are estimated to be £124,600 per year, (39 multiplied by £3,160<sup>9</sup>). This gives a cost of £1.1 million PV over 10 years. The low estimate is £0.5 million PV over 10 years, equivalent to £62,300 annually and is calculated by multiplying the low estimate of 20 new offences a year by £3,160. The high estimate is £2.1 million PV over 10 years, equivalent to £249,200 annually and is calculated by multiplying the high estimate of 79 new offences a year by £3,160.

### Non-monetised costs

20. There may be some additional costs and effects that have not been monetised. These might include a reduction in the size of the legal component parts market as a result of the proposed

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<sup>8</sup>Home Office internal estimates on police hourly costs. Hourly cost for Sergeant and below, includes salary, expenses, regional allowance, training and employer contributions to pension and national insurance. The estimates were calculated using the Annualised Survey of Hours Earnings (ASHE), Chartered Institute of Public Finance and Accounting (CIPFA) Police Actuals and The National Police Chiefs Council (NPCC) Mutual Aid Rates. Estimates use the latest figures available for the various inputs.

<sup>9</sup> Unit CJS cost. See footnote 13 for further detail.

restrictions on component parts. As the number of component parts used in the illegal manufacture of ammunition is estimated to be negligible compared to the number of legally held components, it has been assumed that the restrictions will not impact the size of the legal market. The restrictions may also impact the market if individuals no longer purchase component parts for legal purposes as they feel at risk of police activity. Any costs as a result of this are uncertain and have not been monetised. These assumptions will be tested in the consultation and information will be sought on the size of the market.

## Total Costs

**Table 1 – Summary of the total costs of option 2, present value over 10 years, £.**

Cost (£)	CJS	Police enforcement	Police familiarisation	Total
<b>Central</b>	1,072,400	154,700	1,400	<b>1,228,400</b>
<b>Low</b>	536,200	58,000	300	<b>594,500</b>
<b>High</b>	2,144,700	386,800	3,300	<b>2,534,800</b>

Source: Home Office Analysis and Insight calculation based on numbers sourced earlier on in the document, 2019 prices. Discount rate of 3.5 per cent applied in line with HMT Green Book (2018) guidance. All values to the nearest £100.

## BENEFITS

21. The intended benefit of Option 2 may be a reduction in firearms-related crime. This has not been monetised due to a lack of data/evidence on whether these restrictions will reduce firearms related crime and to what extent. Instead a breakeven analysis has been carried out to assess how many homicides and robberies would have to be prevented for the benefits to exceed the costs.
22. The estimated cost to society of a firearms homicide is £3.5 million and the minimum cost of a firearms-related robbery is estimated at £12,300 in 2019/20 prices<sup>10</sup>. For context, there was an average of 45 firearms-related homicides in England and Wales each year between 2004/2005 and 2014/2015 and just over 3,000 firearms-related robberies. Given the estimated total cost of Option 2, where the best estimate is £1.2 million (present value over 10 years), this means one homicide, or 117 robberies would need to be prevented over 10 years for the benefits to exceed the costs. This is equivalent to just over 11 robberies a year. This robbery analysis is based off discounted costs and compares the present value of 10 prevented robberies (one each year throughout the appraisal period) to the total present value of the costs.

## Total costs and benefits, NPV, BNPV and EANDCB

23. The concept of present value (PV) considers that a set sum of money is not as valuable to people at some point in the future as it would be today, reflecting in part, time preference and in part, an assumption that the economy is expected to grow over time. The marginal utility of each additional pound diminishes in the future. Future costs and benefits therefore must be discounted in order to be comparable to today's costs and benefits. The Net Present Value (NPV) of a policy is the present value of the economic benefits minus the present value of the economic costs. This is widely used to give a welfare measure of a policy in comparable terms, that is in monetary units.
24. The NPV of the costs and benefits of the Ammunition Policy is -£1.2 million (PV over 10 years). This is mainly driven by a CJS cost of £1.1 million (PV over 10 years).
25. Estimated Business Net Present Value (BNPV) is -£0.0 million.
26. The equivalent annual net direct cost to business (EANDCB) of this legislation is estimated to be £0.0 million.

<sup>10</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf) - Figures all in 2015/16 prices so updated to 19/20 prices.

27. No benefits have been monetised, as it is difficult to estimate how many crimes will be prevented by the measures introduced by the ammunition policy. However, breakeven analysis has been undertaken to demonstrate the magnitude of benefits required in order to outweigh the net costs of the policy (see end of 'Benefits' section).

**Table 2 Summary of NPV over 10 years and total costs, (£) to the nearest £100**

**Central**

<b>Cost (£)</b>	<b>Year 1</b>	<b>Year 2 -10 (Annual undiscounted)</b>	<b>NPV over 10 years</b>
<b>CJS costs from new offences</b>	124,600	124,600	-1,072,400
<b>Police enforcement costs from new offences</b>	18,000	18,000	-154,700
<b>Police familiarisation</b>	1,400	0	-1,400
<b>Total</b>	143,900	142,600	-1,228,400

Note: Figures may not sum due to rounding

**Low**

<b>Cost (£)</b>	<b>Year 1</b>	<b>Year 2 -10 (Annual undiscounted)</b>	<b>NPV over 10 years</b>
<b>CJS costs from new offences</b>	62,300	62,300	-536,200
<b>Police enforcement costs from new offences</b>	6,700	6,700	-58,000
<b>Police familiarisation</b>	300	0	-300
<b>Total</b>	69,300	69,000	-594,500

**High**

<b>Cost (£)</b>	<b>Year 1</b>	<b>Year 2 -10 (Annual undiscounted)</b>	<b>NPV over 10 years</b>
<b>CJS costs from new offences</b>	249,200	249,200	-2,144,700
<b>Police enforcement costs from new offences</b>	44,900	44,900	-386,800
<b>Police familiarisation</b>	3,300	0	-3,300
<b>Total</b>	297,400	294,100	-2,534,800

Source: Home Office Analysis and Insight calculation based on numbers sourced earlier on in the document, 2019 prices.

Note: figures may not sum due to rounding.

## **F. Proportionality**

28. A significant effort has gone into analysing the impact of the controls on possession of component parts of ammunition policy. However, the consultation will seek to obtain more data to obtain more robust estimates in order to strengthen the assessment of the potential impacts of these policy changes.

## G. Risks

29. Option 2 places restrictions on buyers of component parts. These are designed to prevent illegal activity and not to affect legal activity, so it is assumed the market will not be affected. However, there is no data with which to assess whether there would be a reduction in sales caused by the new restrictions and so there remains a risk that some consumers could reduce the amount of component parts they buy. Potential impacts on the market are assumed to be negligible but will be developed as part of the consultation.
30. In addition, there is a lack of data on the likely number of offences that the proposed restrictions will generate. The central assumption in this impact assessment is that there are 39 additional offences per year. The sensitivity analysis in Table 3 shows how costs to the CJS and police would change if this number turns out to be higher or lower than 39, along with the impact it will have on the overall present value of the policy.

**Table 3 Sensitivity analysis of CJS and police costs depending on varying levels of new offences, in £**

Number of offences	Annual CJS cost from new offences	Annual police cost from new offences (undiscounted)	CJS cost from new offences over 10 years (PV)	Police cost from new offences over 10 years (PV)	NPV of overall policy over 10 years
5	15,800	2,300	136,000	19,600	157,000
10	31,600	4,600	272,000	39,200	312,600
20	63,200	9,100	544,000	78,500	623,800
25	79,000	11,400	680,000	98,100	779,500
30	94,800	13,700	816,000	117,700	935,100
35	110,600	16,000	952,000	137,300	1,090,700
<b>Central estimate (39)</b>	<b>124,600</b>	<b>18,000</b>	<b>1,072,400</b>	<b>154,700</b>	<b>1,228,400</b>
40	126,400	18,200	1,088,000	157,000	1,246,300
50	158,000	22,800	1,360,000	196,200	1,557,600
60	189,600	27,400	1,632,000	235,400	1,868,800
70	221,200	31,900	1,904,000	274,700	2,180,100
80	252,800	36,500	2,176,000	313,900	2,491,300
100	316,000	45,600	2,720,000	392,400	3,113,800
120	379,200	54,700	3,264,000	470,900	3,736,300
140	442,400	63,800	3,808,000	549,400	4,358,800
160	505,600	72,900	4,352,000	627,900	4,981,300
180	568,800	82,100	4,896,100	706,300	5,603,700
200	632,000	91,200	5,440,100	784,800	6,226,200

Source: Home Office Analysis and Insight calculation based on numbers sourced earlier on in the document, 2019 prices. NPV of overall policy based upon central enforcement and CJS assumptions and central estimates for familiarisation costs. Values to the nearest £100.

## H. Direct costs and benefits to business calculations

31. There are no expected costs or benefits to business as a result of this policy.

## **I. Wider impacts**

32. There are no significant wider impacts anticipated from this policy.

## **J. Trade Impact.**

33. There is not expected to be any impact on trade or investment as a result of this policy.

## **K. Monitoring and evaluation (PIR if necessary), enforcement principles.**

34. Any measures considered necessary after the responses to the consultation have been considered may need primary legislation by government. Therefore, an implementation date is yet to be agreed. The Home Office will monitor the effectiveness of any new measures introduced via regular inspections of firearms data and trends.

## Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p><b>Statutory Equalities Duties</b></p> <p>We do not consider there are any significant PSED implications arising from the proposals in this impact assessment. However, the consultation will ask for views on the impact of the Government's proposals on protected characteristics so that we can assess this more accurately.</p>	<p><b>Yes</b></p>

The impact assessment checklist provides a comprehensive list of specific impact tests and policy considerations (as of February 2019). Where an element of the checklist is relevant to the policy, the appropriate advice or guidance should be followed. Where an element of the checklist is not applied, consider whether the reasons for this decision should be recorded as part of the Impact Assessment and reference the relevant page number or annex in the checklist below. Any test not applied can be deleted except **the Equality Statement**, where the policy lead must provide a paragraph of summary information on this.

The checklist should be used in addition to [HM Treasury's Green Book guidance](#) on appraisal and evaluation in central government (Green Book, 2018).

The Home Office requires the **Specific Impact Test on the Equality Statement** to have a summary paragraph, stating the main points. **You cannot delete this and it MUST be completed.**

## Economic Impact Tests

Does your policy option/proposal consider...?	Yes/No (page)
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<b>Small and Micro-business Assessment (SaMBA)</b>  The impact of the policy on Small and Micro-businesses has been considered, and it has been assessed that the policy will not impact business, and so there will be no implications of the policy on them.	Yes
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## Social Impact Tests

<b>New Criminal Offence Proposals</b>  Proposed new criminal offences will need to be agreed with the Ministry of Justice (MOJ) at an early stage. The Justice Impact Test (see below) should be completed for all such proposals and agreement reached with MOJ before writing to Home Affairs Committee (HAC) for clearance. Please allow 3-4 weeks for your proposals to be considered.	
<b>Justice Impact Test</b>  The justice impact test is a mandatory specific impact test, as part of the impact assessment process that considers the impact of government policy and legislative proposals on the justice system. [ <a href="#">Justice Impact Test Guidance</a> ]	Yes