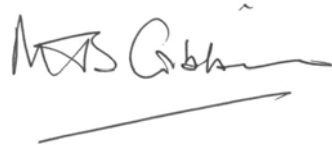
 Regulatory Policy Committee	OPINION	
Impact Assessment (IA)	Improving the code of practice for victims of crime	
Lead Department/Agency	Ministry of Justice	
Stage	Consultation	
Origin	Domestic	
IA Number	MOJ187	
Date submitted to RPC	06/02/2013	
RPC Opinion date and reference	25/02/2013	RPC13-MOJ-1710
Overall Assessment	AMBER	
<p>The IA is fit for purpose. The final stage IA will need to include further consideration of the impacts of the proposals on civil society organisations and further detail on the quantification of costs in the current system where these are available.</p>		
<p>Identification of costs and benefits, and the impacts on small firms, public and third sector organisations, individuals and community groups and reflection of these in the choice of options</p> <p><i>Quantification of costs.</i> The IA identifies potential costs of the proposals but does not include any quantification of those costs, even where it would appear that this would be possible. For example, the time requirements for taking Victim Personal Statements (VPS) or the costs of restorative justice (RJ) facilitation in the current system could provide useful information for understanding the impact of the expanded scope and potential trade offs. The consultation should be used to develop estimates of costs if they are not currently available.</p> <p><i>Impact on civil society organisations.</i> The IA identifies that the proposals will have an impact on civil society organisations who work with victims of crime, for example in taking a VPS, navigating the complaints process or signposting RJ. The consultation should test these impacts and whether they could be considered direct in order to inform the Department’s analysis of the proposals at the final stage.</p> <p><i>Benefits.</i> Since the proposals involve an expansion of existing initiatives (i.e. an increase in the categories of victims covered by the Code; allowing larger businesses to make a VPS; and the inclusion of victims of adult offenders in RJ), where possible the IA should include more information about the effectiveness of these initiatives. This would help to assess the IA’s statements (e.g. at paragraph 56) that costs “<i>will be outweighed by the benefits to victims of crime.</i>”</p> <p><i>EU requirements.</i> The IA could be clearer on the requirements of the EU Directive and why the existing procedures and code are insufficient to meet those requirements.</p>		
<p>Have the necessary burden reductions required by One-in, One-out been identified and are they robust?</p> <p>The IA states that the proposals do not have a direct impact on business or civil</p>		

society organisations, and as such are out of scope of One-in, One-out (OIOO). This is in accordance with the current OIOO Methodology (paragraph 16, i). However, as stated above, if there is any direct impact on civil society organisations as a result of the expanded system, then this will be in scope of OIOO. If this is the case, the evidence supporting the estimated Equivalent Annual Net Cost to Business (EANCB) will have to be further strengthened so that it can be validated at final stage.

Signed

A handwritten signature in black ink, appearing to read "Michael Gibbons", with a long horizontal stroke underneath.

Michael Gibbons, Chairman