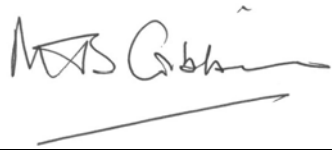
 Regulatory Policy Committee	OPINION	
Impact Assessment (IA)	ASB, Crime and Policing Bill: Community Protection Notice, Community Protection Orders and Community Trigger	
Lead Department/Agency	Home Office	
Stage	Final	
Origin	Domestic	
IA number		
Date submitted to RPC	08/04/2013	
RPC Opinion date and reference	16/05/2013	RPC12-HO-1218(4)
OITO Assessment	GREEN	
<p>Overall comments on the robustness of the OITO assessment.</p> <p>The IA says that the proposal is a regulatory measure that will impose a net cost to business (an 'IN') with an Equivalent Annual Net Cost to Business (EANCB) of £1.0m. This is consistent with the current Better Regulation Framework Manual (paragraph 2.9.10).</p>		
<p>Overall quality of the analysis and evidence presented in the IA</p> <p><i>Costs and benefits.</i> The IA has addressed the issues raised in our previous Opinion (03/12/2012). In particular, the IA now explains that there will be transitional costs to businesses who would wish to understand and be compliant with the law. The IA also discusses how businesses intend to deal with the effect of the multiple thresholds of the Community trigger. In relation to the costs to businesses of removing graffiti, the IA explains that the vast majority of businesses already undertake such activity as it is in their interests to do so. In addition, the IA also says that “<i>many local authorities also make clear that they offer a free graffiti cleanup service</i>” (paragraphs 44-45). As a result, the additional costs of this new requirement are expected to be small. The IA should, therefore, explain in more detail the rationale for this intervention, and what the benefits of this aspect of the proposal are expected to be, given that 99% of businesses are assumed to clean up graffiti already.</p> <p><i>Monitoring and evaluation.</i> We note that it has not been considered possible to quantify any of the benefits of this proposal “<i>because of a lack of evidence about how notices are currently used and how this might change under Option 2</i>” (paragraph 51) and also because of “<i>a lack of centrally collected data</i>” (paragraph 22). It is therefore unclear how the problem under consideration, or the intended benefits of the proposal, can be fully understood. In addition, the IA says that “<i>central data collection would not be appropriate</i>”. The Department will need to ensure the planned local collection of data will enable a more appropriate and effective level of policy evaluation in future.</p>		

Signed

Handwritten signature of Michael Gibbons in black ink, featuring a stylized 'M' and 'G'.

Michael Gibbons, Chairman