

**Deborah Watters**  
Vice Chair

**Date:** 18 August 2015

Mr Alastair Ross MLA  
Chair of the Justice Committee  
Room 242  
Parliament Buildings  
Stormont  
BELFAST BT4 3ZZ

Dear Alastair

### **JUSTICE NO. 2 BILL**

Thank you for the opportunity to respond to the Justice Committee's consultation on the Justice No.2 Bill. The Board's response is confined to two issues which directly relate to the Board's statutory functions of ensuring an efficient, effective police service which is compliant with the Human Rights Act 1998.

Firstly, in reference to proposals for a police power of arrest in relation to Fine Default Hearings, the Board previously responded to DoJ consultations in 2011 and 2014 on this issue. In a time of economic austerity and increasing pressure on policing and criminal justice budgets, the civilianising of fine collection and enforcement has the potential to make more PSNI officers available to tackle other strategic priorities and make better use of police resources. I welcome that the Department anticipates that warrants issued to police will drop by as much as 90% following the introduction of a new civilianised Service.

Secondly, the Board's Performance Committee has commented in consecutive Human Rights Annual Reports that they believed the Board's Custody Visitors should visit non-designated places of detention. The Committee previously agreed in May 2013 that the recommendation made by the UK's National Preventive Mechanism that the Minister of Justice should bring non-designated police stations within the statutory remit of the Custody Visiting Scheme. I therefore welcome clause 41 of the draft Bill which will amend section 73 of the Police (NI) Act 2000 in order to extend the remit of the Board's Custody Visiting Scheme to include non-designated police stations.

The Board would be grateful if you would consider these comments as part of your response to the consultation. Please copy the Board's Director of Policy, Amanda Stewart, into any further correspondence on this issue.

Yours sincerely



**DEBORAH WATTERS**  
Vice Chair (274334)