



Summary Justice Reform

Delivering a Unified Courts Administration Sheriffdom of Glasgow and Strathkelvin

Summary of Responses to the Written Consultation

Scottish Court Service
26 September 2008

TABLE OF CONTENTS

2	BACKGROUND	3
3	RESPONSES	3
4	COMMENTS ON LOSS OF LOCAL JUSTICE	4
5	DETAILED RESPONSES TO PROPOSALS	5
6	SCS RESPONSES AND RECOMMENDATIONS	7
	Appendix A – List of Consultees	8
	Appendix B - List of Respondents	12
	Appendix C – SCS Response to comments	13

1 INTRODUCTION

On 13 May 2008, the Scottish Court Service (SCS) issued a consultation paper outlining plans for the unification of the administration of the courts of summary criminal jurisdiction in the Sheriffdom of Glasgow and Strathkelvin to over 150 individuals and organisations/groups (including SCS and local authority staff). The full distribution list can be found in Appendix A. The closing date for responses was 13 August 2008. This report considers and comments on the responses received.

2 BACKGROUND

2.1 Summary Justice Reform Programme

The Criminal Proceedings etc. (Reform) Act 2007 contains the legislative provisions that will be used to replace District Courts with Justice of the Peace Courts and unify the administration of these courts under the control of SCS. The provisions in the Act (unanimously passed by the Scottish Parliament) relating to unification, were based on proposals contained in the “Smarter Justice, Safer Communities - Summary Justice Reform: *Next Steps*” paper published by the then Scottish Executive in March 2005.

The timetable for unification of the remaining non-unified Sheriffdoms is as set out below:

Glasgow & Strathkelvin	8 December 2008
Tayside, Central & Fife	23 February 2009
South Strathclyde, Dumfries & Galloway	June 2009
North Strathclyde	October 2009

3 RESPONSES

3.1 Summary of Responses

Seventeen responses were received. Only eleven responses expressed a particular view. The remaining six merely acknowledged receipt of the consultation document or offered no comment on the proposals set out. A list of respondents is set out at Appendix B

The relevant views expressed comprised:

- **Three responses from MSPs**, two of whom oppose SCS’s proposals, and one of whom has no objection to the proposals;

- **Four responses from Justices of the Peace**, two of whom are opposed to SCS’s proposals, one who completely supports the proposals and one who supports the proposals in principle, but has reservations that a number of specific proposals put forward require more detailed justification;
- **Glasgow City Council** who support the proposal in principle and request some detailed assurances about the arrangements for staff transfers;
- **Glasgow Sheriff Court Social Work Unit** who responded to say that they are supportive of the proposals whilst pointing out that their accommodation requirements must be taken into account in any future developments;
- **South Lanarkshire Council** who consider that a court should be retained in Rutherglen.
- **East Dunbartonshire Justice of the Peace Committee** which opposes the SCS proposals.

A detailed commentary on the responses received, along with SCS’s response to the specific objections to the proposals in the consultation document is set out at Appendix C.

In the main, the responses expressing disagreement were on the basis of loss of local justice. The views expressed on that issue are set out in part 4 below. Other more general comments are covered in part 5.

4 COMMENTS ON LOSS OF LOCAL JUSTICE

4.1 Rutherglen

The Rutherglen Scottish Labour Party MSP, James Kelly, opposes any proposal to close this court as the *“business of the court is regularly reported in the Rutherglen Reformer”* and local media would be unable to report on each specific sitting. This would affect the transparency of justice. Mr Kelly also felt a move to Glasgow was inconsistent with other services being centred in Lanarkshire and that consideration should be given to re-locating the court to Hamilton or East Kilbride.

Robert Brown, the Liberal Democrat MSP for Glasgow Region responded that he saw considerable advantages for cases to be held locally, including particularly the convenience of witnesses, relatives, accused and the public. Mr Brown felt maintaining a local court would release Police resources into the community.

South Lanarkshire Council considers that a court should be retained in Rutherglen as *“the court provides a local justice service with Justices who have a better understanding of the local area.”*

4.2 Kirkintilloch

The East Dunbartonshire Justice of the Peace Committee questioned how it was possible to continue with local justice based on local knowledge when the proposed new court will cover a large and diverse area and was of the view that no courts should close until these issues were resolved.

Mrs Helen Elizabeth Ross, a Kirkintilloch Justice of the Peace commented that the recommendations are cost led and take no account of the Scottish Government's desire to retain local justice, or on the impact that additional travelling time and costs will have on volunteer Justices of the Peace and court users. Loss of local knowledge would be detrimental to the local community. The problems and costs associated with offenders failing to appear at court would be increased if the court at Kirkintilloch was to close. Mrs Ross also felt that time was needed to assess the wider impact of summary justice reform on business volume and profile before closing courts. Finally, Mrs Ross felt that options for local court provision, for instance the local Police station, could be considered if the standards for Justice of the Peace Courts were not set at such a high level.

Mrs Linda McGavigan, a Kirkintilloch Justice of the Peace, felt that the “*ethos that local justice is dispensed by local residents with knowledge of particular problems that beset their neighbours will disappear.*”

Mrs McGavigan is also concerned that Justices of the Peace' local knowledge, which influences sentencing and therefore impacts on the community, will be lost

5 GENERAL RESPONSES TO PROPOSALS

5.1 Glasgow

Crown Office and Procurator Fiscal Service responded to say that they are “*comfortable with the content and implications*” of SCS's recommendations.

Glasgow Sheriff Court Social Work Unit responded to say that they are supportive of the proposals and take no issue with them, stressing only that their accommodation requirements must be taken into account in any future developments.

Thomas Wallace, a Glasgow Justice of the Peace considers the proposals to be “*...clearly thought out, logical and consistent.*”

Andrew Leven, a Glasgow Justice of the Peace responded to state that he fundamentally agrees with the proposals set out in the consultation document, but also states that he believes that in some important respects the consultation document does not provide sufficient detail to substantiate the recommendations.

Glasgow City Council agreed with the SCS proposal that a single Justice of the Peace Court is established for the Sheriffdom of Glasgow and Strathkelvin, and considered “... *the additional Court business from the areas within the Sheriffdom, but outwith the city boundary, could be readily included in the [court] programme*”.

6 SCS RESPONSES AND RECOMMENDATIONS

6.1 SCS view in the light of the responses to Consultation

The detailed considerations applying to SCS are set out at Appendix C. SCS has carefully considered the responses to the consultation and remains of the view that the proposals as originally set out should be implemented.

Rutherglen and Kirkintilloch are each within a short travelling distance of Glasgow. SCS's position is that it is not sustainable to maintain courts that deal with an average of one or two cases per day in each of these locations. SCS is supportive of the principle of maintaining access to local justice but account has to be taken of the very low volume of business and the cost of operating and maintaining these facilities at these locations.

6.2 Comments on Key Issues Raised

SCS offers the following comments in clarification on the key issues raised during consultation. SCS will engage further with stakeholders and respondents to discuss the issues raised and further explain the rationale behind the proposals.

6.3 Access to Local Justice

We place proper value on the expertise and contribution made by local Justices of the Peace. In our view, having regard to the proximity of Kirkintilloch and Rutherglen, local access to justice is not significantly compromised and can be adequately addressed by training and the sharing of knowledge and experience between Justices of the Peace.

6.4 Proposals Driven only by Cost

Cost is a factor and SCS, like all organisations, has to be informed by the financial impact of investment decisions. However other key drivers included in determining best value are levels of business and quality of facilities.

On balance, SCS believes that consolidating services on the Glasgow District Court offers the best opportunity to improve the standard of accommodation we can offer to all court users, particularly with regard to the safety and security of facilities.

For both Kirkintilloch and Rutherglen the costs of investing in those facilities (or alternate sites) to lift them to the standards expected for a reasonable courthouse cannot be supported given that the facilities are in use only one or two days per month. We believe that we can deliver far better value for money for taxpayers by concentrating any funds on improvements on the Glasgow facility.

6.5 Travel/Inconvenience if Justice of the Peace Court is in Glasgow.

There will be some inconvenience to individuals but this must be set against the costs of providing suitable local facilities. There is ready access to a good network of public transport within the Sheriffdom and adjoining areas.

6.6 Justice of the Peace Impact

We anticipate that the majority of Justices of the Peace will continue to sit in the newly established Justice of the Peace Court. If any shortfall becomes evident Sheriffs Principal have the mechanism through their recruitment committee to secure new Justices of the Peace for appointment.

6.7 SCS Recommendations

SCS therefore recommends to the Cabinet Secretary for Justice that:

- A single Justice of the Peace Court is established for the Sheriffdom of Glasgow and Strathkelvin combining the business currently dealt with by Glasgow, Kirkintilloch and Rutherglen District Courts. The court would be based at the current Glasgow District Court where sufficient accommodation is available to accommodate business.
- That Justice of the Peace Courts are not established to replace the current District Courts in Rutherglen and Kirkintilloch which will close, with the business transferring to Glasgow Justice of the Peace Court as noted above.
- With the approval of the Sheriff Principal, and in consultation with criminal justice partners and stakeholders, court programmes for all summary criminal courts will be reviewed to identify scope for efficiencies in the light of changes in business volumes and the implementation of summary justice reforms, to make optimum use of available judicial time.
- A team of 2.5 Legal Advisers, led by a Sheriffdom Legal Advisor will provide Legal support to the Glasgow Justice of the Peace Court.
- The Sheriffdom Legal Adviser will have overall responsibility for supporting justices in the execution of their judicial role, have lead responsibility for establishing the new Justice of the Peace Committee in Glasgow and Strathkelvin, and be responsible for the leadership, management and training of Legal Advisers.

Appendix A – List of Consultees

ACPOS

Ewen MacLellan

Citizens Advice Scotland

Citizens Advice HQ

COPFS

Glasgow Area PF
Glasgow Area Business Manager
Crown Office, Edinburgh
Procurator Fiscal's Society

COSLA

John Terry

Justices of the Peace

Mr Darshan DI Bhatti
Mrs Susan SC Brown
Mrs Farkhanda FM Chaudhry
Mr James J Coyle
Mr Stewart S Daniels
Mrs Caroline C M Dunn
Mr John J Ferguson
Mr George G Fullerton
Mr Edward G Gillespie
Mr Thomas TM Jess
Mr Mohammed MJ Khan
Mr William W Lavery
Mr John J R Lawless
Mr Andrew A Leven
Mr Donald A MacKay
Mrs Margaret M E MacLean
Mrs Linda L M McGavigan
Mr Edward E B McKechnie
Mr Neil M McKechnie
Mr Garry G McLeod
Mr William O McNiven
Rev Stuart S D McQuarrie
Mrs Anne A G Mills
Mrs Eunice E L Paton
Mr John J L Robertson
Mrs Veronica V Rodden
Mr Thomas R M Rowatt
Mrs Jennifer J L Speculand
Mr David Stark
Mrs Marion M Sweeney
Mr Thomas T Wallace

Judicial Studies Committee

Sheriff F R Crowe

Judicial Appointments Board

Sir Neil McIntosh

Law Society/Law Agents Society

The Law Society of Scotland,
Scottish Law Agents Society

Legal Assessors/DC Staff

Glasgow District Court

Mr Howard Rattray
Mrs Eliza Neil
James Heuston
Christina Herriot

Isabel Kelly
Lorraine Craig

Rutherglen District Court

Geraldine McCann
John Donnelly
Ann Hilland
Angus Livingston
Teresa Stone

Kirkintilloch District Court

Alistair Crighton
Carole Crawford

Local Authorities

Glasgow City Council
East Dunbartonshire Council
South Lanarkshire Council

Appendix A – List of Consultees

Bar/Faculty

Glasgow Bar Association
Faculty of Advocates

Local CJB

Sheriff Principal Taylor
Steve Bain
Eileen Kenmuir (Secretary)
Raymund McQuillan
Ewen McLellan,
John Neilson, ACC
Lesley Thompson, Area PF
Pat Wallace, Clerk of Court

Local Court Working Group

Mrs P Wallace
Grace Carthy
Ms Josephine MacLean
Mr Thomas Jess
Mrs Eunice Paton
Mr Alistair Crichton
Mr David Stark
Geraldine McCann
Teresa Stone
Malcolm Macaskill,
Mr John Moore
Mr Ken Brown
Mandy McDowall
John Davidson
Karen Carroll
SP James Taylor
Lesley Thomson
Anne Currie
Caroline Tomlin
Ms Sara Matheson
Mr Gerry Considine
Robert Fyfe
Ms Kathleen Caskie
Mr David Rutherford
Mr David Hastings
Ewan MacLellan
Val McIntyre
Eddie Smith
Mr Gilbert Anderson
Ian Pearson
Paul Burns

Local Social Work

No Consultation

Media

John McCroskie

MSPs

Jackson Carlaw
Ross Finnie
Annabel Goldie
Stuart MacMillan
Stewart Maxwell
Gil Paterson
Bill Wilson
Bashir Ahmad
Bill Aitken
Robert Brown
Bill Butler
Margaret Curran
Bob Doris
Patricia Ferguson
Charlie Gordon
Patrick Harvie
James Kelly
Bill Kidd
Johann Lamont
Paul Martin
Frank McAveety
Pauline McNeill
Nicola Sturgeon
Sandra White
David Whitton

National CJB

Mr Craig Flunkert
Rachel Weir

Strathclyde Police

Ewen McLellan

Reliance

David Rutherford

Appendix A – List of Consultees

Sheriffs

Sheriff J A Baird
Sheriff J Beckett, QC
Sheriff P M M Bowman
Sheriff S Cathcart
Sheriff D Convery
Sheriff A F Deutsch
Sheriff A C Henry
Sheriff M Jones QC
Sheriff B Kearney
Sheriff D Leslie
Sheriff M Liddell
Sheriff D M MacNeil QC
Sheriff C W McFarlane QC
Sheriff A MacKenzie
Sheriff I H L Miller
Sheriff J K Mitchell
Sheriff S Murphy QC
Sheriff A W Noble
Sheriff A C Normand
Sheriff I A S Peebles QC
Sheriff J Platt
Sheriff R E A Rae QC
Sheriff S A O Raeburn QC
Sheriff N Ritchie
Sheriff N Ross
Sheriff L M Ruxton
Sheriff C A L Scott
Sheriff W J Totten
Sheriff L Wood

Sheriff Clerk and Staff

Steve Bain
Aileen Currie
Joe Margey
Alan Johnston

Sheriffs Principal

Sheriff Principal Dunlop
Sheriff Principal Bowen
Sheriff Principal Kerr
Sheriff Principal Lockhart
Sheriff Principal Taylor
Sheriff Principal Young

SJA

No Consultation

SLAB

Chief Executive

SPS

No Consultation

Stipendiary Magistrates

Mr Robin Christie
Mrs Josephine MacLean

Union

Ken Brown, PCS
Ann Russell, UNISON
Alex McLuckie, GMB
Matt Smith, UNISON,
Mandy McDowall, UNISON

Victims and Witnesses

Victim Support Headquarters
Glasgow City Victim Support
East Dunbartonshire Victim Support
South Lanarkshire Victim Support

Appendix B - List of Respondents

In total, 17 responses were received -

- 4 Individual Justices of the Peace
- 4 Members of Scottish Parliament
- 3 Local Authorities
- 1 East Dunbartonshire Justice of the Peace Committee
- 1 Glasgow Sheriff Court Social Work Unit
- 1 Glasgow Community Justice Authority
- 1 Judicial Appointments Board for Scotland
- 1 Faculty of Advocates
- 1 COPFS

Respondents were offered a number of options regarding their wishes for making their name, address and response public. Individual respondents could opt to have:

- Response, name and address made available
- Response only made available
- Response and name available but not their address

Organisations or groups were advised that their name and address would be made available but were given the options to have:

- Their response made available
- Their response to be treated in confidence

All respondents were asked permission for the Scottish Court Service to contact them again in the future in relation to their consultation responses.

Appendix C – SCS Response to Comments

Comment	SCS Response
General Comments on Loss of Local Justice	
<p>Justices have a better understanding of the local area</p> <p>Justice of the Peace local knowledge, which influences sentencing and therefore impacts on the community, will be lost and their particular skills are being disregarded and discarded.</p> <p>Local justice dispensed by local residents with knowledge of particular problems that beset their neighbours will disappear</p> <p>Advantages to cases being heard locally: Additional knowledge of the area a local court can bring;</p> <p>Advantages to cases being heard locally: convenience to witnesses relatives, accused and the public.</p> <p>The recommendations contained in the consultation document take no account of the Scottish Government’s desire to retain local justice.</p> <p>Justices of the Peace were assured on many occasions by officials of Scottish Government Justice department that there would be no court closures. Many Justices of the Peace made their decision about whether or not to stay on as Justices on the basis of these assurances.</p> <p>Many accused have drink and especially drug issues and chaotic life styles. They are mainly local people and they need their Court to be local and to be in touch with the local Criminal Justice Social Services.</p>	<p>Any concerns as to lack of knowledge of types of accused persons/types of crime/offending patterns in the area can be addressed by training and the sharing of knowledge and experience between Justices of the Peace and other professionals from affected courts.</p> <p>It is accepted that there will be a small amount of additional travel time for a number of court users, but it is minimal, especially so in the case of Rutherglen. Access to regular public transport throughout the jurisdiction is good.</p> <p>Community involvement will be maintained through retention of lay justices, albeit at a single location within the general locality</p> <p>SCS has no record of such assurances having been given. Consideration has to be given to the overall provision of court estate, and to have courts sited where they are genuinely needed.</p> <p>Contact with local Criminal Justice Social Services is not affected by the proposal.</p>

Comment	SCS Response
General Comments on Loss of Local Justice	
<p>Business of the court is regularly reported in the local media who would be unable to report on each specific sitting, with the result that justice will not be reported in the local media on the regular basis that it is currently.</p> <p>Lack of local reporting is a disadvantage to local people who have become used to the transparency of justice being processed locally and also in seeing these results reported in the local press.</p>	<p>SCS notes the loss of the convenience of reporting for local press. Court business is fixed so as to achieve the most efficient and effective results for the benefit of all court users.</p> <p>Court proceedings are often covered by various newspapers and reported according to the public interest. Which cases are covered and reported from individual courts is a matter for the editor.</p>
General Comments on Costs	
<p>Increase in travelling time and costs that volunteer Justices of the Peace (from Kirkintilloch) will have to assume if the recommendations are accepted.</p> <p>Most Justices of the Peace (from Kirkintilloch) do not claim expenses at all at present but would have to consider it in circumstances where even more time is spent travelling or training which is going to add exponentially to the cost of the new system.</p> <p>The court closures appear to be cost led but do not take full account of increased costs to Justice, accused citizens, the police and others.</p>	<p>Court business will be absorbed into the existing Glasgow Justice of the Peace Court programme without additional court days having to be factored in. Thus, there is more likely to be a reduction overall in Justice of the Peace Court expenses since cases will run alongside other business. The number of Justices travelling to Glasgow from East Dunbartonshire is limited: two have taken up commissions for Glasgow and Strathkelvin.</p> <p>The impact on additional expenses will be minimal compared to the cost of provision of adequate court facilities at Kirkintilloch.</p> <p>There are a number of reasons for not establishing Justice of the Peace Courts in Rutherglen or Kirkintilloch, including the major costs in either providing or upgrading courts where volumes are low and which only sit two days a month. Costs of this magnitude cannot be justified for such low volumes of business.</p>

Comment	SCS Response
Glasgow	
<p>Glasgow CJ SW Dept accommodation in Turnbull Street requirements must be taken into account in future developments.</p>	<p>Both SCS and Glasgow City Council are aware that in addition to the court, the Turnbull Street premises in Glasgow houses the Glasgow Police Museum and Social Work department. All of that building's occupants are being considered in discussions between the Council and SCS on the future plans for that site.</p>
<p>The option to open up two unused courts in St Andrew's Street to accommodate additional business from Rutherglen and Kirkintilloch would require some expense to bring them up to standard.</p> <p>The consultation document does not set out the full implications of utilising the building in St Andrew's Street. There are issues that need to be addressed including security and health and safety. The building in St Andrew's Street needs a detailed inspection including a full access audit by those qualified to undertake such an audit.</p> <p>Future investment in the St Andrew's Street building could well exceed any savings that may be made by closing Kirkintilloch and Rutherglen District Courts.</p> <p>The consultation document does not set out fully the cost implications required to ensure that the court facilities in Glasgow meet the standards required.</p>	<p>The data gathered during the scoping phase of the project on court loadings and utilised court time shows sufficient capacity in the current programme. This was also the view of the local District Court management.</p> <p>SCS will be undertaking an access audit of the building as part of the normal procedures of our property function. We acknowledge our obligations under Disability Discrimination Act legislation and will make reasonable adjustments where practicable once we take formal possession of District Court buildings.</p> <p>SCS recognises a need to invest in court accommodation in Glasgow, whether or not court business currently heard in Kirkintilloch and Rutherglen District Courts transfers.</p> <p>The consultation document was intended to set out the fundamental proposal for the future configuration of Justice of the Peace Courts.</p>
<p>The assertion made in the consultation document that an allocation of 2.5 Legal Advisors will be an adequate resource for the Justice of the Peace Court in Glasgow and Strathkelvin must be substantiated rather than simply stated.</p>	<p>Glasgow City Council has confirmed that this is an adequate provision based on their detailed knowledge of the District Court business.</p>

Comment	SCS Response
Glasgow (cont.)	
<p>There is a necessity to assess the staffing requirement in association with the number and location of the courts used. This assessment must be fully consulted on with the staff concerned.</p>	<p>Staffing requirements and consultation were carried out as part of the development of the proposals. Staff consultation will continue in relation to implementation issues.</p>
Kirkintilloch	
<p>Inconvenience of travelling (to Glasgow) as opposed to volunteers Kirkintilloch.</p> <p>Many of the offenders appearing in Kirkintilloch District Court live in a deprived area and have drink and especially drug issues and chaotic lifestyle. Many of the offenders ordained to appear personally at court fail to do so and will not appear further away (at Glasgow) so there will be additional costs in terms of warrants and enforcement, overnight detentions and transport costs.</p>	<p>SCS notes that some inconvenience will be caused, but observes that only two Justices from East Dunbartonshire have taken up commissions in Glasgow and Strathkelvin.</p> <p>One of the main drivers of Summary Justice Reform has been to address the problem of repeated calling of cases and failures to appear. Changes have been made to the Summary Justice system with the aim of reducing the number of failures to appear in all courts, and there is no evidence to suggest at this stage that keeping Kirkintilloch District Court open will be essential to avoid increasing failures to appear.</p>
<p>Standards set for court premises seem unnecessarily high. It might be worth investigating whether there is spare capacity in Kirkintilloch Police Station which could provide all facilities required.</p>	<p>It is important that Justice of the Peace Courts operate with a fit for purpose level of accommodation. Availability of suitable alternate premises would not change the underlying issue of an insufficient volume of cases to warrant a dedicated court in Kirkintilloch.</p>
<p>Waste of Police resources as a result of additional time travelling to Glasgow.</p>	<p>In Rutherglen, over the past three years the average number of trials proceeding per court day was two. The number of witnesses of any kind, including police, was therefore low. Travel time to Glasgow is minimal. No other police resource is used as Reliance now deal with supervision and transportation of custody cases.</p>

Comment	SCS Response
Rutherglen	
<p>Closure would result in increased costs to local people having to travel further afield. Incorporation of Rutherglen District Court within the South Strathclyde, Dumfries and Galloway Sheriffdom would allow court proceedings to take place in either Hamilton or East Kilbride. Transport links to these venues are comparable with access to Glasgow, particularly Hamilton, which can be accessed by regular bus and train services.</p>	<p>Jurisdiction of unified Justice of the Peace Courts is determined by the Sheriffdom within which they are located. In the case of Rutherglen that is Glasgow and Strathkelvin. It is therefore not competent within existing statutory provisions to incorporate Rutherglen in South Strathclyde, Dumfries and Galloway. Transport links and costs as between Rutherglen/Cambuslang and Glasgow have been investigated and were found overall to be faster and cheaper than between Rutherglen/Cambuslang and Hamilton/East Kilbride.</p>
<p>A joint development of the custody facilities already present in the Police station adjacent to the court should be explored to overcome one aspect of the accommodation issues at Rutherglen.</p>	<p>There is a wider range of accommodation and related issues which would require to be addressed, and the volume of business does not warrant the level of investment that would be required.</p>
<p>The Court building could be used for meetings outwith normal court times (in relation to under usage).</p>	<p>The discontinued operation of Rutherglen as a court does not preclude the use of the building by any council supervised party for any other purposes. Operation and promotion of non-court related activity is not core business of SCS; there would be no SCS resource to organise or manage this if the building transferred to SCS.</p>

Comment	SCS Response
<p data-bbox="136 226 748 262">Comments on Timing of Changes</p> <p data-bbox="136 262 748 409">The impact of Legal Aid fees reductions is likely to result in an increase in the numbers of unrepresented accused, it seems inappropriate to close Courts at this stage.</p> <p data-bbox="136 451 748 661">Many factors and possibilities have apparently not been considered in the current proposals. Therefore the proposed closures in December should at the very least be deferred until all of these issues have been resolved.</p> <p data-bbox="136 703 748 808">It is inappropriate to close Courts at least until the situation in terms of quantity of business is clear.</p> <p data-bbox="136 850 748 1102">The proposals in the consultation document are based on current Court business, and Justices of the Peace have been assured of, and are being trained to deal with, new types of business flowing into the District and Justice of the Peace Courts as a result in changes to Crown marking policy.</p>	<p data-bbox="748 483 1524 808">The proposals were based on two main factors: (a) the current data available from District Courts, and (b) projected business as a result of all aspects of summary justice reform, including direct measures. The reforms envisaged that the volume of business in the new Justice of the Peace Courts would be similar to the current level in the District Courts. SCS continually monitors workloads and takes action to ensure the speedy and effective disposal of business.</p>
<p data-bbox="136 1142 748 1178">Miscellaneous Comments</p>	
<p data-bbox="136 1178 748 1213">Will there be enough trained staff?</p>	<p data-bbox="748 1178 1524 1325">Yes. In Glasgow all existing trained staff, legal and non-legal, will transfer to SCS under TUPE arrangements. Recruitment of new staff will be limited to two front line non-legal administrative staff.</p>