

Addressing Disadvantage in the Administrative Justice System

A report by the Addressing Disadvantage working group of the Administrative Justice Council

March 2024



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Chair's Foreword

This overview provides the background to the AJC's Addressing Disadvantage Working Group, its purpose and aims and selected initial findings of its fieldwork.

The interim report of the Working Group sets out the difficulties faced by an increasing number of those engaging with the system to obtain justice, those advising them and those dealing with their applications.

Two things stand out from the work that has been done so far:

Firstly, there is no bright line separating those who experience challenges engaging with the system and those who don't. Although many people, for a variety of reasons which are not under their control, will always find the system difficult to navigate, it's clear that any one of us could experience difficulty in certain circumstances. For instance, I know full well that if I did not have support from people more technically competent than me in my family and at work, I would struggle to engage successfully in some of these processes, which would, in turn make it less likely that I would be able to gear myself up to attempting them, particularly if I were unconvinced that there was any point in doing so, and already very busy and stressed with my daily life and its difficulties. Personal circumstances can include life events such as bereavement or sudden loss of income; everyday pressures such as having to combine stressful work and family responsibilities; reduction in resilience to withstand financial or emotional shocks arising from homelessness or domestic violence as well as lack of the technical skills and time to understand and navigate the administrative justice system.

Secondly, our findings suggest that there are no bad guys here; all the people we have engaged with are doing their best in very difficult circumstances; they all know there are problems; and all would support improvements in the system. This means that, bad as the situation described in our report is, there is room for optimism if those with the authority to introduce meaningful change work with those at the sharp end to achieve this.

We need to recognise that these operational challenges in the system are, to a certain degree, inevitable. The law can be complicated and is often precise, and the goal of making it accessible to all is probably impossible. We are fortunate in having a network of specialist lawyer and non-lawyer advisers in this field, but it is stretched nearly to breaking point by the demands placed on it, and not all who need advice will have access to it.

The task, therefore, is to make it as accessible as possible to as many people as possible who are either engaging with the system independently or doing so with the help of advisers and supporters.

Administrative justice covers a wide range, from the life-changing decisions made in immigration and asylum cases and mental health detention cases to the everyday decisions that any one of us could be subject to, such as traffic fines, council tax appeals and planning applications (for or against). It is not unreasonable to think that, for many people, their experience of Justice in this



country comes from administrative justice, which suggests the huge importance of ensuring that it works and is experienced as fair.

As the administrative justice system has moved to online appeals and remote tribunal hearings, the impact on users of HMCTS' modernisation programme could not be ignored in this work. However, the AJC's Digitisation working group is focusing in detail on the rollout of the modernisation programme. As our work has progressed and with the help of the Secretariat, the two groups have learnt from each other's work, which has, unsurprisingly, highlighted some common themes, for example the technical barriers some appellants face when attending a hearing online.

We have spent quite a lot of time trying to find an accurate way to identify collectively the group of people who are most likely to struggle with the system.

Although we are focusing on the system rather than the users, while utilising the various experiences of users to illuminate the problems in the system and point to possible improvements, we think it is helpful to have a descriptive term to describe those who, because of their personal circumstances or particular characteristics, will struggle to receive a just outcome from the administrative justice system.

Vulnerability has been suggested as a catch-all description, but we have rejected this as the term carries a faint implication that the problem lies with the person described as vulnerable, rather than with the system with which they are trying to engage. It also suggests that the individual is somehow inadequate, whereas the truth may be that they are showing remarkable stamina and ingenuity in coping with very difficult situations.

Nowadays more and more people living normal and productive lives are comfortable using the term 'mental health' when discussing their emotional wellbeing (or otherwise), such that the term now encompasses not only diagnosed illnesses but also stress, anxiety, panic, fear, depression, grief, exhaustion etc, whether or not these conditions are diagnosed or treated. For the purposes of this report, what matters is whether experiences or feelings such as these, whether or not arising from the difficult circumstances mentioned above, compromise a user's ability to obtain justice. We have therefore decided to refer to users' mental health, including, but not limited to, all the emotions and experiences mentions in the previous sentences when we are talking about the personal characteristics and circumstances that can affect people's access to justice and that should be considered when we try to address disadvantage in the administrative justice system.

Our final report is due next year. It would be a great pleasure to be able to report that this interim report has led to change, or, at least, conversations about change.

Lucy Scott-Moncrieff, Chair



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Introduction

The working group was convened in February 2023 in response to the AJC's Advice Sector Panel membership reporting an increase in the number of distressed and/or frustrated users entering the administrative justice system, particularly since the pandemic. Together with the impact of the cost-of-living crisis, our advice sector members reported that the increase in numbers was having a significant effect on their services and on the wellbeing of their staff.

With reports such as Pro Bono Economics' <u>Breaching the Dam</u>¹, and Community Justice Fund's <u>The Funding Gap</u>², highlighting the pressures that third sector organisations now find themselves under, the group was keen to understand the current experiences of the administrative justice system's users and advice representatives.

As the work of the group has progressed, it is becoming clear that by understanding how the system might work better for those who struggle to navigate their way through it, any improvements will be felt by each and every user, regardless of their personal characteristics or circumstances.

Objectives

The Terms of Reference listed the following objectives –

- Identify 'pinch points' in the system that compromise the experience for these users;
- Identify and promote examples of best practice used by those working in the administrative justice system;
- Explore practical ways in which those working in the system could be better supported to
 assist these users to access the administrative justice system whilst being mindful not to
 place further burden on those working in the frontline;
- Look to the wider justice system for examples of good practice that could be adopted;
- Consider how the modernisation programme has impacted on this particular cohort of users and suggest ways in which the impact may be improved;
- Highlight the ways in which the pandemic and the cost-of-living crisis has impacted on these
 users, the advice sector and, more widely, on service provision.

The working group comprises representatives from organisations that include specialisms in mental health, frontline advice, pro bono support, academia and ombudsman schemes. A list of members can be found at Appendix A. Between February 2023 and January 2024, the working group met five times.

¹ Breaching the Dam, An analysis of the VCSE Sector Barometer, in partnership with Nottingham Trent University's National VCSE Data and Insights Observatory, December 2022

² The funding gap - Free Legal Advice Sector 2023-24, Community Justice Fund, March 2023



Approach

To date, our fieldwork has taken the form of small-scale surveys, focus groups and interviews. In the first instance, members of the group designed two surveys. The first³, aimed at advice representatives working in administrative justice, was designed to discover: whether representatives were seeing more clients who were presenting with behaviours that suggested mild, medium or severe mental health distress; and, if there was an increase, what impact that increase was having on how representatives were undertaking their work. Finally, we sought to establish whether the increase in distressed and/or frustrated clients was having an impact on staff wellbeing.

The second survey⁴ was undertaken by a pro bono lawyer and member of the working group, during face-to-face interactions with users who attended a Law Centre for assistance and advice. Its questions focused on gathering information on users' health, significant life events and digital capabilities together with their experiences of the administrative justice system during a cost-of-living crisis. The survey results have been utilised by two AJC working groups – the Digitisation group and this disadvantaged users working group. Its findings are presented in both groups' interim reports.

All respondents to the representatives' survey were offered the option of attending a focus group. The aim of the focus group⁵ was to focus on the responses received in the survey, in order to elicit a greater understanding of the experiences of frontline workers in administrative justice. A small number of meetings⁶ were also held with individual advice representatives.

In addition to the surveys, focus groups and fact-finding meetings, the group's Chair, the AJC Secretariat and members of the group have identified and engaged with various stakeholders. These have included engagement with the Judicial Office and a member of the Equal Treatment Bench Book's editorial team; meetings with: the Civil Justice Council's mental capacity working group chairs, academics engaged in vulnerability plans in corporate organisations, HMCTS representatives, UK public services ombudsman, and mental health organisations.

In January 2024, a judicial focus group was convened. Judges working within the administrative justice system were asked a series of questions about their experiences. The responses from the group are still to be analysed and will form part of our final report, next year.

Whilst the numbers for the surveys were low, they backed up anecdotal evidence we heard from working group members and other stakeholders and provided the group with a foundation to explore the issues further in the next phase of the project. The views are not necessarily representative of the whole advice sector but does provide the working group with some insights into the challenges faced by disadvantaged users.

³ Responses to the advice representative's survey were received between 25 September 2023 and 9 October 2023;71 responses were received.

⁴ The survey was undertaken between 4 August 2023 and 17 November 2023; the user survey elicited 28 respondents.

⁵ The advice representatives' focus group took place on 21 November 2023; 4 representatives attended.

⁶ Meetings with five advice representatives in November and December 2023.



Findings

So far, our factfinding has highlighted four main themes: the changing needs of users, staff wellbeing, existing barriers, and examples of good practice.

The changing needs of users

Our findings point to three areas of change for users: advice needs, health needs and digital needs.

Regarding health needs, two thirds (66%) of survey respondents from the advice sector reported seeing an increase in clients who they perceived as displaying or who reported mental health difficulties since the first lockdown in March 2020. The behaviours displayed varied from the mild and moderate to severe.

Between 70 - 85% of representatives who completed the survey were 'often' seeing clients who they perceived as displaying or reported the following:

- Feelings of being overwhelmed
- > Experiencing problems with completing normal, daily activities
- > Forgetfulness and concentration problems

Representatives also reported seeing clients who they believed displayed or reported serious mental health issues that included self-harm, suicidal ideation and/or obsessive/intrusive thoughts.

Whilst representatives are dealing with a client's advice needs, some told us that they are also spending their time assisting with issues related to their client's health and digital needs. One representative reported:

'Every week, we contact at least one of our client's GP's or social workers to ask them to carry out a wellbeing check on them.... It's time-consuming.'

We were informed of the pressure some representatives felt when trying to signpost clients to specialist mental health providers:

'I feel very unsure when I try to help as we don't have many options available to us now.'

'I feel desperate. The situation is getting worse.'

'Clients tell us things they should be telling a therapist.'

We were told that some advice organisations had agreements with community mental health providers and could make introductions on behalf of clients. Other representatives advised their clients to speak to their GP. Some signposted people to mental health services but clients tell them they don't hear back or are told that they don't fulfil their criteria for mental health assistance. One representative told us their client was considering spending her Personal Independent Payment (PIP) contributions on personal therapy after her NHS counselling came to an abrupt end.

Our users' survey supports the experiences of the representatives, with most users we spoke to reporting multiple health problems.



In relation to the type of health issues users were experiencing, of the 28 users surveyed, 79% reported a physical health issue, and 68% of the users surveyed had experienced a mental health issue over the last year.

Regarding digital needs, users reported experiencing multiple obstacles in an increasingly digital world (Figure 1 below):

Do any of the following issues create barriers to using the internet?

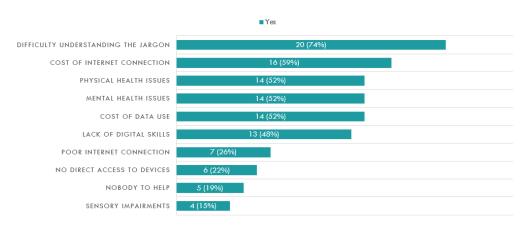


Figure 1: Barriers to using the internet

Those taking part in our users' survey were likely to have experienced multiple barriers, with users most frequently identifying four separate types.

Of particular note, is the struggle respondents faced in understanding the language around technology. They reported that everyday terminology can be confusing to people who aren't digitally skilled, leaving them embarrassed and at risk of isolation. During the users' survey it became clear that terms such as 'smart phone', 'online' and 'digital' were not properly understood.

The image below offers some of the answers to an open question about barriers:





Figure 2: Barriers to using the internet

In the advice representatives' survey, respondents also reported frustration from clients who were unable to deal with the increasing demands of digitisation. From local authorities to utility providers, users are required to open online accounts and to interact digitally. Frustration begins at this early stage for the less digitally able, particularly when there are digital stages to be undertaken before a user can speak to a person.

Attending to these multiple needs takes time. Our survey showed that representatives are working hard to change the way they work to best suit such clients:

| special measures you use to help the client? (Tick all that apply | | |
|--|------|--|
| | | |
| | % | |
| Allow more time for the appointment | 80 | |
| Lots of active listening | 80 | |
| Encourage/Facilitate client to bring relative/key worker with them | 68.6 | |
| Schedule in an additional appointment | 65.7 | |
| Signpost or refer to support agencies | 64.3 | |
| Provide advice in an alternative format | 58.6 | |
| Provide breaks | 52.9 | |
| Refer adviser within service with specialist training | 32.9 | |
| Other | 5.7 | |
| None of these | 1.4 | |

Figure 3: Measures to help clients

However, representatives reported that some of these changes were affecting capacity, resulting in fewer clients being able to access advice.



Staff wellbeing

The representatives' survey and subsequent focus groups have both pointed to a profession of advice representatives who are working hard but struggling to cope with the changing needs of their clients. With organisations such as the Money & Pensions Service⁷ recognising the increase in complexity of client cases that have resulted in adjustments to its expectations of debt advisers, it follows that advice representatives working in related areas might be experiencing similar challenges.

It was also reported that the changes are affecting staff wellbeing. Over 72% of respondents in the representatives' survey reported that the increase in distressed and/or frustrated clients was having an impact on staff wellbeing, with the most frequently reported impacts being:

- Increased stress
- > Feeling overwhelmed
- Sleep disturbances
- > Feelings of pressure
- Burnout

LawCare, the legal profession's mental health charity, reports a 24% rise⁸ in legal professionals contacting the charity for mental health support. The group asked representatives about mental health training, de-briefing opportunities after working with challenging clients, and supervision. The response suggested that provision is patchy; one respondent reported having 'begged' management for supervision. Those representatives who work in a role that is attached to the NHS seem to be provided with the most support.

Since the pandemic, remote working means those on the frontline miss out on the small but significant face-to-face interactions with colleagues during the working day. Representatives reported being too busy dealing with clients to debrief to their over-stretched supervisors. But some believe that a compulsory, regular check-in instigated by a qualified colleague would be beneficial to their wellbeing. A number of representatives we spoke to were leaving or had recently left frontline work and they cited the lack of support and heavy workloads as reasons why they were moving on. Representatives informed us that:

'Line managers are too busy to offer support.'

'I have received supervision as a frontline worker which I found helpful. I've since left the frontline because of burnout..... With so many organisations closing, representatives are expected to do more with less.'

'I'm trying to stave off burnout. Colleagues have taken time off with mental health difficulties of their own.'

⁷ MaPS makes changes to debt advice grants in response to increased complexity of client cases in community-based services, Money & Pensions Service, April 2023

⁸ 24% increase in the number of people contacting LawCare for support, LawCare, October 2023



'What is being asked of us is beyond what good management and good training can provide. Much of it is because of the state of the NHS.'

The following case study illustrates how advice organisations are adapting their ways of working in response to the changing needs of clients with clustered issues.

Case Study provided by frontline organisation

Over recent months, we have seen staff well-being deteriorate due to the challenges that they are facing. Clients used to visit our service for help with a specific issue whereas they now visit with a cluster of issues. We saw a change in client needs after the pandemic, but this has intensified at such an alarming rate since the cost-of-living crisis.

One particular client could not submit her court form as she was street homeless and did not have a permanent address, no support network or access to phone or email. What should have been a one-hour appointment, turned into four hours, whilst they tried to find somewhere for the client to stay overnight to get off of the cold streets. The person supporting the client came from the appointment drained and emotional and needed support themselves having to debrief with another member of staff and utilise the counselling line. Staff are spending more and more time with clients meaning that we have less appointments available.

We have linked with other organisations such as LawCare to provide support to staff and volunteers, we have had training from a Registered Mental Health Nurse, had training on vicarious trauma, allocated time for peer support meetings and improved systems for safeguarding and personal safety. The reality is that this still isn't enough to support staff and volunteers to enable them to support clients in the way that they need.

Existing literature is consistent with our findings. The <u>Funding Gap Report</u>⁹ highlighted that the existing issues around workforce recruitment, retention, and staff wellbeing experienced in frontline free legal advice organisations are being exacerbated by both an increase in demand and a further squeeze on resources. The Report emphasised the most effective way to address these issues would be longer term investment in the core costs of running advice organisations.

Addressing the Skills Gap within Advice Services¹⁰ highlighted a consistent view that advice work involves working with people with worsening and more entrenched problems and that staff were increasingly impacted by vicarious trauma and feelings of being unable to cope with demand. Pressures have been further exacerbated by the Covid pandemic, where advice moved largely online, and the sector experienced huge increases in demand on already overstretched provision. A related issue is the lack of time and sometimes skills set of some managers, which is hampering their

¹⁰ Addressing the Skills Gap within Advice Services, London Legal Support Trust, May 2022

⁹ Funding Gap Report, The Access to Justice Foundation, 2023-2024



ability to support and develop staff effectively. This report also produced an amalgamation of wellbeing support solutions¹¹

In its <u>The Recruitment and retention of mid-career lawyers in civil society organisations¹²</u> report, Baring Foundation reinforces the issue of short-term grant funding leading to greater instability for workers at a time when they need financial stability due to impacts of Covid-19 and the cost of living crisis. The report also highlights the stressors for workers in the sector which include low pay; long hours; administrative tasks; unpaid work; vicarious trauma; pressures in the wider justice system; and low morale linked to negative perceptions in the media. Financial instability alongside caring responsibilities can also lead to increased stress. The risk of burnout is generally high both in the voluntary and legal sectors.

Baring Foundation offers a number of suggestions it believes will help to future-proof the sector: mentorship and intergenerational exchange, mid-career communities of practice, extended funding terms applicable to recruitment of positions, bursaries and loan forgiveness; and strengthening legal education and training opportunities.

Existing Barriers

The lack of access to advice together with feelings of frustration for those who are digitally compromised have already been discussed as sources of exasperation. In the group's surveys and focus groups, users and representatives described a long-winded process. A representative attending a focus group told us:

'The process itself exacerbates anxiety. Each step has a purpose but put together they are considerable. The form-filling and assessment are the worst parts. I tell clients that once they are through those stages, that's the worst over with.'

'Clients are worn down by the process and by feeling they are disbelieved.'

Representatives told us that backlogs and delays can have an impact; and that users are more likely to drop their appeal because they are unable to deal with the associated, extended period of stress.

Representatives and users told us that an absence of legal understanding can lead to confusion and distress. Clients can be reluctant to appeal a decision because they mistakenly believe they might be subject to criminal sanctions if their appeal is unsuccessful. Similarly, clients often confuse the tribunals system with court hearings and will refuse to attend unless their representative agrees to accompany them. The thought of attending alone is too stressful a prospect for some. But, with heavy workloads, a representative's attendance is not always an option.

The case study below illustrates how clustered legal issues combined with a lack of legal understanding can impact on users.

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¹¹ Ibid. p.40

¹² The Recruitment and retention of mid-career lawyers in civil society organisations, Baring Foundation, August 2023



Case study provided by a frontline organisation

A client came into our service for support. She had been directed to us from counter staff in the court building. She had a number of issues but her focus for this appointment was her imminent eviction for non-payment of rent which was due to her benefits having been stopped and the client not understanding the right to appeal or the appeals process.

The client's first language was not English, and she did not understand the paperwork she had been sent. What became apparent through the course of the support session was the client's ill health. She then disclosed she had just come out of hospital after suffering a stroke. The stress of the eviction and no money was clearly exacerbating her condition and 30 minutes into the session, she collapsed. Security and first aiders were called but the client was refusing to leave the building or have treatment until a form was submitted to suspend the eviction as she believed this to be the cause of the stroke.

A form was submitted to suspend the eviction, the client was treated, and a referral made to another organisation to help her with the benefits appeal as well as looking at support she could get at home for her health needs. The client clearly did not understand her rights or the information that she had received.

Further, representatives at our focus group told us that the use of magistrates' court buildings for tribunal hearings can lead to feelings of intimidation and shame on the part of users, resulting in a reluctance to attend a hearing. The dual use of buildings contributes to this confusion, with appellants requiring repeated reassurance from representatives. Advice representatives reported that for users with learning disabilities, particularly those with experience of the criminal justice system, they may be unable to differentiate between a magistrates' court and a tribunal, leading to misunderstanding and anxiety.

Representatives in the focus group who work in the area of welfare benefits reported that a lack of understanding of mental health by the agencies involved in the administrative justice system resulted in those entitled to assistance withdrawing their appeals. As with some physical conditions, mental health conditions can be fluctuating. If a client receives communications regarding their case during a particularly challenging time, representatives reported that some clients telephone HMCTS to withdraw their appeals. Without the requisite understanding, HMCTS staff are stopping appeals which then need to be re-started once the representative has explained their client's medical circumstances.

We were informed that the current system sometimes requires users to provide the same information about their health on multiple occasions, which can lead to feelings of distress and frustration. Welfare benefits advice representatives reported their frustrated and/or distressed clients being labelled as aggressive by agencies. Once a person is labelled as aggressive, their interactions with such agencies can become even harder. Additional training of frontline staff in mental health might prompt a more informed approach when communicating with users who are



struggling. A 2021 report by <u>Revolving Doors</u>¹³ offered a number of solutions for staff dealing with users with complex needs. Recommendations included adopting a different approach to questioning, offering a call-back service for distressed users, and providing a team with specialist skills.

Examples of Best Practice

The working group continues to discuss how examples of best practice might be identified and shared across the administrative justice system. Whilst further examples will be identified in the second phase of the project, we have begun by examining the following areas, some being specific to the justice sector (Equal Treatment Bench Book), whilst others sit outside of it (the corporate world; a collaboration between advice services and mental health services).

1. The justice system

- The working group plans to compare approaches across the rest of the justice system civil, criminal and family with a view to identifying best practice that might be applied to the administrative justice system.
- Equal Treatment Bench Book¹⁴ (ETBB): this is a guidance document on best practice in
 pursuance of equality, fairness and just outcomes. Aimed at judicial office holders working
 across all jurisdictions, it is a publicly available text, published by the Judicial College, but
 written by a cross-jurisdictional panel of judicial officer holders consulting, where necessary,
 with relevant organisations and special interest groups to provide the information contained
 therein. Chapters tackle subjects including physical disability, mental disability,
 cultural/ethnic differences, gender and racism.

It has been suggested that, whilst the ETBB enjoys a greater visibility in the criminal courts, its contents and guidance might yet be better utilised by those working in and using the administrative justice system.

2. The corporate world

The corporate world has different, but equally cogent, motivations for understanding how to best engage with its customers. In recent years and particularly since the pandemic, companies have invested time and resources in identifying ways to engage better with particular cohorts of clients. It therefore seems logical that there might be some learnings on engagement from the corporate world that could cross over into the justice system. Stakeholder engagement led the group to Capital One's <u>Vulnerability Inclusion Handbook</u>¹⁵ that identifies five principles of: confidence and trust, accessible information, clear choices, easy journey, and specialised support.

¹³Identifying, understanding, and responding to the multiple complex needs of court service users, Revolving Doors, 2021

¹⁴ Equal Treatment Bench Book, February 2021, April 2023 edition

¹⁵ Vulnerability Inclusion Handbook, Capital One



3. Collaboration between advice services and mental health services

Representatives told us they struggle to signpost their users to appropriate mental health assistance. Whilst we are wary of asking more in the way of upskilling and training of advice representatives who are already stretched, some representatives do want to feel more confident when dealing with distressed and frustrated clients. The group is seeking examples of these partnerships to understand how they might assist users of the administrative justice system.

Next Steps

We plan to continue our engagement with judicial office holders by way of additional focus groups to gather further perspectives and experiences of how the system is working for its users.

Regarding barriers to justice, we will also be looking at the contribution made to the administrative justice system by ombudsman schemes. This will include a consideration of how well the public is able to fully utilise and understand such schemes. At a time when public services are under strain, bodies such as the Parliamentary and Health Service Ombudsman (PHSO) and the Local Government and Social Care Ombudsman (LGSCO) need the resources, powers and freedom to offer full support to public services, in learning from challenges and making improvements for the benefit of all administrative justice users. Engagement with administrative justice academics will continue; training resources are being developed in relation to public services ombudsman schemes' engagement with vulnerable users.

As well as conducting a more extensive literature review, working group members have identified the following questions to be explored:

- > How might the ETBB be better utilised to help users understand their rights in the tribunals?
- ➤ Can the administrative justice system learn from the criminal justice system about improving engagement with users with complex needs?
- ➤ What steps can be taken to improve staff wellbeing without burdening those working on the frontline with more responsibilities/upskilling?
- ➤ How might advice organisations and mental health services work more collaboratively to share their knowledge?
- What can we learn from the corporate world that might reduce user frustration and distress and improve engagement with the administrative justice system?

The final report will be published next year and will make a number of recommendations on how the system can be improved to help both users and those they come into contact with as they navigate through the administrative justice system.



APPENDIX A

Working Group Membership

Lucy Scott-Moncrieff (Chair), Managing Director, Scott-Moncrieff and Associates

Stephen Buckley, Head of Information, MIND

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Shyam Popat, COO, Advocate

Catherine Robinson, Professor of Social Care, University of Manchester

Martha de la Roche, Network Director, The Access to Justice Foundation

Diane Sechi, Pro Bono Lawyer, Simmons & Simmons, South West London Law Centre

Rachel Stalker, Clinical Legal Education Programme Leader, Liverpool John Moores University

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Rebecca Wilkinson, Chief Executive, LawWorks

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Heidi Bancroft, Secretary to the Administrative Justice Council

Sally Hunt, JUSTICE/AJC Secretariat