



# Law Officers' Department

## Business Plan 2022



## Foreword

I am pleased to present the Business Plan for the Law Officers' Department which sets out our objectives for 2022. The Business Plan has been agreed by the Department's Senior Management Team with input from our staff.

I referred to the 2020/21 report of the independent Lexcel assessor in my Foreword to last year's Business Plan. I am delighted to note that in her most recent report which covers 2021/2022 the Lexcel assessor found once again; *"a true team culture within the Department with real support for all staff at all levels from management down and also peer to peer support."* The assessor also reported that *"the Department continues to excel in employee engagement"* which provides us with an excellent base for 2022.

Looking forward, pages 7-9 of the Business Plan summarise our key objectives and deliverables for 2022. In addition to our essential work of providing the independent prosecution service for the Island, supplying legal advice to the Government, the States Assembly and the Crown and providing advice to safeguard Jersey's vulnerable children and adults, the Department has specific areas of work to focus on. These include continuation of the work on developing Free Trade Agreements following Brexit, the Children's legislation programme, continuing advice in relation to the response to Covid-19, and on tackling financial crime and work arising from the Island's forthcoming Moneyval Assessment.

We will also be investing in new technology by implementing a new practice management system and a litigation support system. In conjunction with other Non-Ministerial Departments in 2022 we will be introducing an independent Audit Committee to oversee our governance arrangements and use of resources.

Pages 11-13 of the Business Plan summarise how we will develop our staff, our commitment to diversity, equality and inclusion, and our measures concerning health, safety and wellbeing. Continuing and developing our supportive team culture is essential to meeting our objectives for 2022.

**Mark Temple QC**  
**HM Attorney General**



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<b>Department</b>	Law Officers' Department
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<b>Services covered</b>	<b>Civil Division</b> Advice Commercial & Contentious Property Safeguarding <b>Criminal Division</b> Criminal Courts Economic Crime and Confiscation Unit Mutual Legal Assistance
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<b>Crown Officers</b>	HM Attorney General Mark Temple QC HM Solicitor General Matthew Jowitt QC
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## 1. Our purpose

### Our Purpose

The Law Officers' Department provides advice to the Government, States Assembly, Crown, assists overseas law enforcement agencies and is the prosecution service for the Island

The **Attorney General** has overall responsibility for the Department and is titular head of the Honorary Police.

The **Solicitor General** deputises for the Attorney General and gives advice on his own account.

The Law Officers' Department consists of the Civil Division and the Criminal Division supported by a small Administration team.

A Director manages each division. The **Civil Division**, headed by Advocate Sylvia Roberts, is divided into four teams; Advice; Commercial and Contentious; Safeguarding; and Property.

The **Advice team** has 11 Legal Advisers and assistants providing advice regarding the following: international treaties, and trade, customs and immigration, European Law, sanctions, statutory interpretation, extension of UK legislation to Jersey, drafting of Orders in Council and Rules of Court, legislation projects, human rights, penalty review of draft legislation, drafting of Royal Assent memoranda, and public law advice.

The **Commercial and Contentious team** consists of 11 Legal Advisers and assistants who provide advice in respect of contracts and contractual disputes, employment and



discrimination claims, data protection and freedom of information, planning, personal injury claims, tax, general civil litigation and applications for judicial review.

The **Safeguarding team** consists of nine Legal Advisers and assistants who provide advice to the Children's Service about the care and protection of children in the Island, and deal with applications for public law orders in relation to children. The Team also provides advice to Health and Community Services in relation to vulnerable adults and those who lack mental capacity. The Team also assists the Attorney General in carrying out his functions as designated Central Authority under the Hague Convention on the Civil Aspects of International Child Abduction.

The **Property team** consists of three members of staff who advise on all property related matters and who deal with conveyancing work on behalf of the Public of the Island and the Crown.

The **Criminal Division**, headed by Howard Tobias, is divided into three teams: the Criminal Courts Team (CCT); the Economic Crime and Confiscation Unit (ECCU); and the Mutual Legal Assistance Team (MLA).

The **Criminal Courts team** prosecutes cases before the Magistrate's and Youth Courts, the Royal Court and Court of Appeal (Criminal Division), and gives advice to the States of Jersey Police, the Honorary Police, Customs, and numerous Government regulatory Departments. The team consists of 15 Legal Advisers and assistants.

The **Economic Crime and Confiscation Unit** was established in October 2017 in order to ensure that the Island remains at the forefront of the fight against financial crime and money laundering. The team is expanding significantly in 2022 and currently consists of nine staff: six Legal Advisers and assistants, one Detective Sergeant, one civilian investigator and a forensic accountant.

The **Mutual Legal Assistance team** handles international requests and consists of four Legal Advisers and assistants and an MLA liaison officer.

The **Administration** team of 17, headed by Alec Le Sueur, supports the Law Officers and legal staff, in order that the functions of the Law Officers can be carried out efficiently and effectively and in line with the Public Finance Manual and Codes of Practice.

## Our Values

We share the values of all States of Jersey employees:

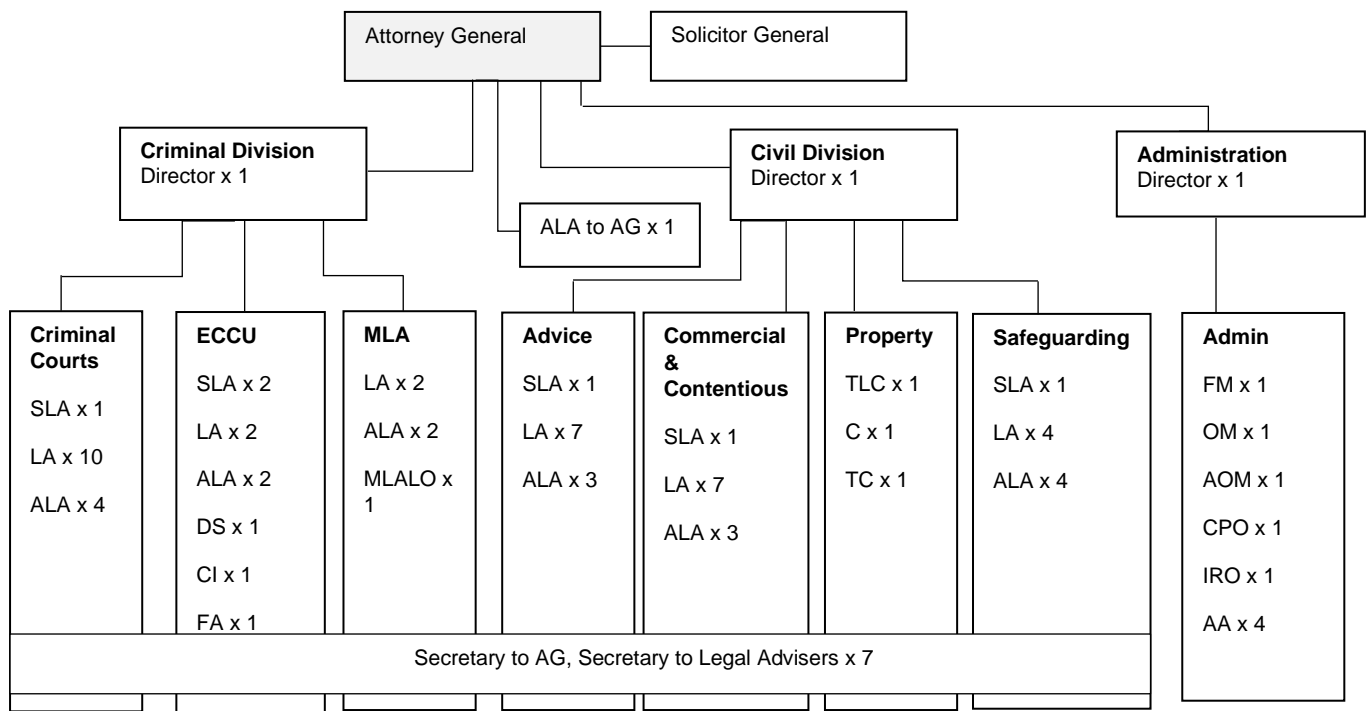
- We are respectful
- We are better together
- We are always improving
- We are customer focused
- We deliver



Our values are supported by a set of high-level behaviours, which guide us in our individual roles: **collective core values and behaviours**

All staff adhere to the States of Jersey Code of Conduct and the Department's lawyers follow a **Code of Conduct** which sets out the required high standards in the interests of justice and in relation to their duties as public officers.

## 2. Law Officers' Department Organisation Chart



Headcount: 85

### Notes

AA: Administration Assistant AG: Attorney General ALA: Assistant Legal Adviser AOM: Assistant Operations Manager C: Conveyancer CI: Civilian Investigator CPO: Court Proceedings Officer DS: Detective Sergeant ECCU: Economic Crime and Confiscations Unit FA: Forensic Accountant	FM: Finance Manager IRO: Information and Records Officer LA: Legal Adviser MLA: Mutual Legal Assistance MLALO: Mutual Legal Assistance Liaison Officer OM: Operations Manager SG: Solicitor General SLA: Senior Legal Adviser TC: Trainee Conveyancer TLC: Team Leader – Conveyancing
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### 3. Our key objectives and deliverables

<b>Key Objectives and Deliverables</b>		
<b>Key Objective</b>	<b>Key Deliverable</b>	<b>Lead Service</b>
1) To provide legal advice to the Government, States Assembly and the Crown	High quality and timely legal advice provided, including property transactions.	Civil Division: Advice Team; Commercial & Contentious Team; Property Team  Criminal Division: Criminal Courts Team
2) To provide an independent prosecution service for the Island	High quality and timely advice provided. Prosecutions in the Royal Court and Magistrate's Court carried out fairly, efficiently and effectively.	Criminal Division: Criminal Courts Team; ECCU
3) To protect the interests of the Crown and the Government in civil proceedings	High quality and timely advice provided. Hearings in the Courts and Tribunals carried out fairly, efficiently and effectively.	Civil Division: Commercial & Contentious Team
4) To help safeguard children and adults at risk	High quality and timely advice provided. Proceedings in relation to children concluded expeditiously. Advice provided in relation to vulnerable adults or those who lack capacity and applications made to Court as appropriate.	Civil Division: Safeguarding Team
5) To enable the forfeiture and confiscation of the proceeds of crime	High quality and timely advice provided to JFCU and forfeitures carried out fairly, efficiently and effectively.	Criminal Division: ECCU MLA
6) To assist overseas law enforcement agencies	High quality and timely assistance provided.	Criminal Division: MLA
7) To carry out the statutory and customary law duties of the Attorney General	Exercise disciplinary and other functions in relation to the Honorary Police. Ensure <i>Partie Publique</i> functions performed effectively.	Attorney General Civil Division: Safeguarding Team Advice Team
<b>Specific for 2022</b>		
<b>Workstreams</b>	<b>Key Deliverable</b>	<b>Lead Service</b>
1) Provide continued advice regarding the Island's Covid-19 response	High quality and timely advice provided on Covid-19 issues to enable the Government to effectively protect the public and support the economic recovery following the pandemic.	Civil Division: Advice Team Commercial & Contentious Team Safeguarding Team
2) Continue to advise on the negotiation and implementation of Jersey's trading relationships, including the Trade Co-	High quality and timely advice provided on international trade arrangements and their implementation to ensure Jersey can maximise the opportunities	Civil Division: Advice Team



operation Agreement with the EU.	arising from new relationships while protecting its economy and constitutional position.	
3) Tackling financial crime and preparation for the Moneyval assessment	High quality advice and investigations of financial crime to ensure Jersey complies with best practice and maintains the Island's reputation as a well-regulated international finance centre. Significant expansion of the ECCU team in order to provide such advice and carry out investigations. High quality and timely advice on legislative reform.	Criminal Division: ECCU MLA Civil Division: Advice Team Commercial & Contentious Team
4) Advice in relation to the children's legislation programme	High quality and timely advice provided in relation to children's legislation and implementing new statutory duties	Civil Division: Advice Team Safeguarding Team
5) Advice and representation in connection with Art 2 ECHR inquests	High quality and timely advice provided in relation to Art 2 inquests	Civil Division: Commercial & Contentious Team
6) Advice and representation in connection with TIEA notices and challenges	High quality and timely advice provided in relation to tax information exchange	Civil Division: Commercial & Contentious Team
7) Further development and training of SoJP on frontloading of cases and on unused material	Timely and successful prosecutions with efficient use of resources	Criminal Division: Criminal Courts Team; ECCU
8) Advice in relation to tax collection and other initiatives for Revenue Jersey	Increase in revenue for the Government of Jersey by taking legal action in relation to unpaid taxes	Civil Division: Commercial & Contentious Team
9) Work on improving the arrangements for dealing with personal injury claims	Reduce risk to Government of Jersey as a result of PI claims	Civil Division: Commercial & Contentious Team
10) Increase the support provided to the Government in respect of immigration reform and casework	High quality advice provided to the Government to support post Brexit legislative development and an expected increase in casework, including by recruiting a specialist immigration lawyer	Civil Division: Advice Team
11) Provide legal advice to support the effective operation of the election in June 2022 including to the Elections Authority	High quality and prompt advice provided on the revised electoral arrangements for the 2022 elections and to support the Elections Authority in its role	Civil Division: Advice Team Commercial & Contentious Team
12) Support the Our Hospital Project team to acquire land needed for construction of the new Hospital	High quality advice and representation	Civil Division: Property Team Commercial & Contentious Team
<b>Financial / Operational</b>		
1) Develop and improve more efficient processes using functionality of new	New Case Management System developed and implemented (iCasework)	All





Case Management System		
2) Maintain efficiency savings established in MTFP2 and perpetuated through GP2020/21	Keep within approved revenue budget expenditure limits	Accountable Officer
3) Maintain Lexcel accreditation	Adhere to Lexcel Standards to achieve Lexcel accreditation for fourth year	All
4) Digital engagement – continue to progress digital solutions	<ul style="list-style-type: none"> <li>- Full participation in the Courts Digital Project throughout 2022 in order to ensure success of the project for efficient use of the Courts and the Justice System (both in relation to prosecutions and to civil court cases)</li> <li>- Embrace e-discovery solutions for use in financial crime investigations</li> </ul>	SMT and relevant teams  ECCU
5) Ensure continued service delivery in light of Covid-19 response	Maintain Business Continuity Plan and flexible working arrangements in line with the GoJ Safe Exit Strategy	SMT

## 4. Monitoring progress and risk management arrangements

### Monitoring Progress of delivery of the Business Plan

Management Information regarding meeting performance standards, as set out in the Service Level Agreement and the Service Standard established with instructing departments, can be obtained through the Department's practice management system, Prescient Plus and through the maintenance of records in the teams. Improved management information and KPI reporting is anticipated with the change of the Department's practice management system from Prescient Plus to iCasework in 2022.

It is expected that the Digital Courts project will improve the range of data available for reporting on Criminal Justice measures and Public Law children cases.

Financial performance is monitored through monthly variance reports of spend against budget, reviewed by the Accountable Officer, Finance Manager and regular reviews with the Treasury Department's Head of Finance Business Partnering.

Operational performance is managed through adherence to the Lexcel quality management framework and subject to an annual independent assessment.



## **Risk Management Reporting Arrangements**

The Department's Senior Management Team reviews the departmental Risk Register each quarter. At year end, the Department's Accountable Officer completes a Governance Statement and Compliance Return for the Treasurer, which include details of any breaches or exemptions to the Public Finances Manual. These returns are reviewed by the Government's Internal Auditor.

The Practice Director attends regular meetings with the GoJ Head of Risk to review the departmental Risk Register or review other areas of risk (eg scanning emerging risks and how they translate in a local context, together with areas of corporate risk). The Practice Director also attends the quarterly Departmental Risk Group meetings.

The Accountable Officer, together with the Treasury & Exchequer's Finance Business Partner for the Non-Ministerial Departments, also signs off at year end a Statement of Comprehensive Net Expenditure, a Statement of Financial Position and a Statement of Accounting Compliance.

The Department also adheres to the comprehensive Lexcel Standards on Risk Management which are assessed annually by an independent, external assessor.

## **Non-Ministerial Departments Audit Committee**

In response to a recommendation by the Comptroller and Auditor General, the Non-Ministerial Departments of the States of Jersey have appointed an independent Audit Committee to commence work to oversee their governance arrangements and use of resources. The Audit Committee will oversee the Law Officers' Department together with the Bailiff's Chambers, Judicial Greffe, Probation and After-Care Services, States Greffe and the Viscount's Department.

Marta Phillips OBE has been appointed as chair of the Committee, alongside Committee members Dr Helen Pernelet and Sarah Raynor. The Audit Committee members are required to provide independent counsel, support and constructive challenge to the Accountable Officers of the Non-Ministerial Departments and to provide assurance of the highest standards of corporate governance.

The newly formed Committee will meet at least twice a year and will be supported by a Committee Secretary appointed by the Non-Ministerial Departments.

## 5. Our service users

### **Service Users and Projected Demand for Services**

#### **Civil Division**

Service users are Government ministers and officers of Government departments, members of the States Assembly and officers of the Crown.

Demand for services may increase during the Government Plan period depending on new legislation or increasing demand from the instructing departments for the Law Officers' Department's services. For example in the 2016 – 2019 Medium Term Financial Plan, additional resources were required following Ministerial Decisions relating to Children's



Safeguarding, Adult Safeguarding, Brexit and the Redress Scheme. Additional resources will be required if Ministerial Decisions during the 2022 – 2025 Government Plan result in an increased workload for the Department.

The demand for advice required for the Covid-19 response and in relation to international trade is also expected to remain at a high level for 2022.

### **Criminal Division**

Service users are the States of Jersey Police, the Honorary Police, overseas law enforcement agencies and the Jersey Police Complaints Authority. Service users also include Government departments where advice on criminal matters and/or prosecutions are sought – eg Health and Safety, Social Security, Revenue Jersey, Trading Standards.

Demand for services is subject to levels of reported crime and requests from overseas jurisdictions and will fluctuate from year to year. Additional resources would be required if it became necessary to dedicate more resource to a particular area.

There has been an increase in work levels in the Criminal Courts team due to the Criminal Procedure (Jersey) Law 2018, specifically in relation to the service of the prosecution case in the Magistrate's Court.

With the increase in focus on Financial Crime in the Government Plan period, there will be a requirement to provide additional resources for this specialist area and this work is underway.

The Department does not provide legal advice to members of the public, private businesses or organisations.

## 6. Our people

This section outlines how we will develop our staff and their capabilities and our approach to equality and diversity.

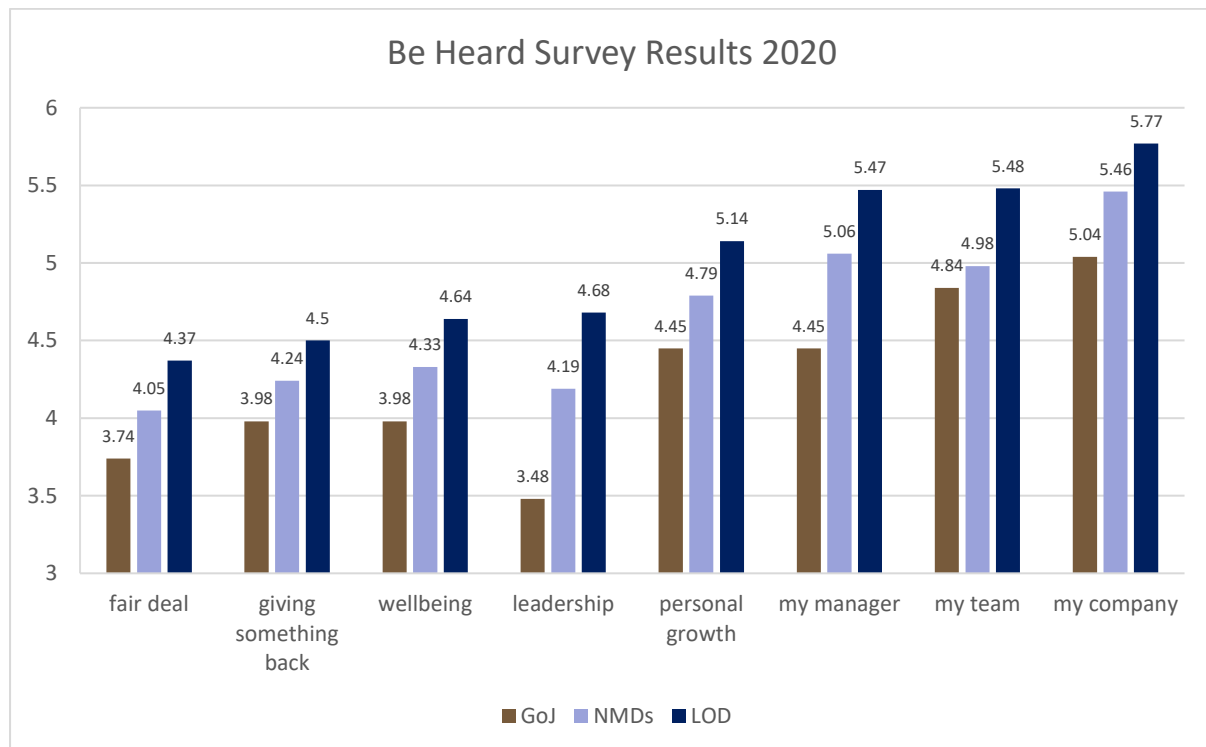
In October 2021, the Law Officers' Department was awarded Lexcel accreditation for 'excellence in practice management and client care' for the third year running. The independent assessor singled out 'people management' as an area with a particularly high number of areas of good practice, commenting that "the department continues to excel in employee engagement" and demonstrates an "exemplary commitment" to employees. The department's approach to flexible working since Covid was singled out as being "hugely popular" and it was noted that the department's "excellent reputation as an employer on the island" is "attracting a high calibre of staff".

The report noted that "the assessor was pleased to hear [from staff interviews] about a true team culture within the department with real support for staff at all levels from management down and also peer to peer support".



This report follows the results of the 2020 Best Companies Be Heard survey, released in March 2021, which found that the Department achieved a score commensurate with ‘an outstanding commitment to workplace engagement’.

In 2022 the Department will take a stand-alone Be Heard employee engagement survey with the target to gain accreditation in line with the 2020 survey results.



### Staff Development and Capability

The Department will support up to four staff members through the Jersey Law Course at the Institute of Law (two in their second year, two in their first year) in 2022.

In the Criminal Division, specialist advocacy skills training will continue to be provided to legal advisers by Queen’s Counsel and experienced criminal practitioners and tutors. In the Civil Division, advocacy training will be provided by an Honorary Professor of Advocacy at Nottingham Law School. All newly qualified advocates will participate in the advocacy training arranged by the Bailiff’s Chambers.

The Civil Division will organise training seminars led by experienced English Counsel to ensure all staff are familiar with the latest developments in public and administrative law.

The Safeguarding Team will organise a specialist training event on dealing with vulnerable witnesses in public law proceedings.



Attendance at specific conferences and training events will be encouraged and supported where appropriate.

Following a break due to the Covid-19 response in 2020/21, in-house training sessions will continue with the Non-Ministerial Departments in 2022.

All managers will be expected to attend the Team Jersey management training sessions and all staff are expected to attend the Team Jersey 'colleague' training sessions.

## **Diversity and Inclusion**

We value diversity and are committed to ensuring a safe, supportive inclusive working environment, free from bullying and harassment where our people feel valued as individuals and able to express and be themselves.

The Department adheres to the Codes of Practice, follows all GoJ policies and in 2022 will engage with Corporate and People Services to ensure that the newly launched People Strategy is embedded in the Department, including supporting the new Diversity Equality and Inclusion Strategy.

## **Health, Safety and Wellbeing**

The health, safety and wellbeing of all staff at the Law Officers' Department is of paramount importance.

The Department follows the States of Jersey's Code of Practice on Health, Safety and Wellbeing which includes the requirement to have measures in place to:

- prevent work related injury or illness;
- provide a safe working environment;
- safeguard the mental health of employees at work; and
- encourage and support employees to take care of their own health, safety and wellbeing as well as that of their colleagues at work.

The Department actively monitors Health, Safety and Wellbeing performance and has controls in place in accordance with the nine key organisational risks that are reported on in the corporate Health and Safety Management Reporting System.



## 7. Our financial context

### Financial Overview

Extract from the approved Government Plan 2022 – 2025, Part 2 Service Level Analysis by Department: **Government Plan 2022 - 2025 Annex**

<b>Service Area</b>	<b>Income</b>	<b>DEL</b>	<b>Net Revenue Expenditure</b>	<b>Non Cash Net Revenue Expenditure</b>	<b>Total 2022 Net Revenue Expenditure</b>
	£000	£000	£000	£000	£000
<b>Law Officers' Department</b>					
Law Officers General	288	8,912	7,904	0	7,904
Court and Case Costs	0	1,111	1,111	0	1,111
	<u>288</u>	<u>9,303</u>	<u>9,015</u>	<u>0</u>	<u>9,015</u>

### Efficiencies

The Law Officers' Department undertook efficiency savings and restructuring in the 2016 – 2019 Medium Term Financial Plan (MFTP2), which enabled spend for each year of MFTP2 to be reduced below the 2015 spend of £8.7m. Approximately £1m was taken off the Department's budget during this period. At the same time as reducing costs, the Department increased headcount significantly in response to increasing demand and a wider range of services provided (additional resources for Children and Adult Safeguarding, the creation of the Economic Crime and Confiscation Unit and work on Brexit and international trade).

Investment in the Department's staff has resulted in a reduction in the amount of work being externalised which has been the main contributor to the savings achieved. As a result of the efficiency savings and prudent financial management, the level of spend in 2021 remained below the Department's spend in 2015.

Having achieved these significant efficiency savings, it is not envisaged that there will be scope for further reductions in expenditure in the Government Plan 2022 – 2025 Government Plan



## 8. What will we do in 2022? Measuring progress against planned deliverables

Objective	Deliverable	Service Lead	Completion Date	Intended Outcome	Success Measures
Provide legal advice to the Government, States Assembly and the Crown	<p>Provide high quality independent legal advice in a timely manner that assists the Government to implement the Common Strategic Policy.</p> <p>Provide high quality independent legal advice in a timely manner to members of the Assembly and Scrutiny panels and others when requested.</p> <p>Adhere to the agreed performance measures as set out in the Service Standard for instructing departments.</p>	Civil Division: Advice Team; Commercial & Contentious Team; Property Team	Ongoing	Ensuring the best advice is provided in order that the Government can execute its Common Strategic Policy and that scrutiny of the Policy may take place for balance.	<p>Quantity of advice given (by number of matters)</p> <p>Timeliness of advice given (KPIs in Service Standard met)</p> <p>Quality of advice given (feedback from instructing departments)</p> <p>KPIs around the time taken to receive Royal Assent for legislation</p>



<p>Provide an independent prosecution service for the Island</p>	<p>Remain independent and fair, delivering justice in every case, making decisions in accordance with the Code on the Decision to Prosecute.</p> <p>Adhere to agreed performance as set out in the Service Level Agreements with the States of Jersey Police. Create further SLAs for all other agencies to whom advice is provided.</p> <p>Through the Economic Crime and Confiscation Unit, investigate and prosecute complex Fraud and Money Laundering cases.</p>	<p>Criminal Division: Criminal Courts Team; ECCU</p>	<p>Ongoing</p>	<p>Protection of the public in a safe society.</p> <p>Prosecution of financial crimes including asset forfeitures under the Forfeiture of Assets (Civil Proceedings) (Jersey) Law 2018.</p>	<p>Quantity of advice given / prosecutions (by number of matters) Timeliness of advice given (KPIs in Service Level Agreement met) Quality of advice given (feedback from SoJP, number of successful appeals) KPIs around the time taken for elements of the Criminal Justice system over which the Department has control.</p>
<p>Protect the interests of the Crown and the Government in civil proceedings</p>	<p>Civil proceedings conducted in the Royal Court of Jersey and other courts/tribunals.</p>	<p>Civil Division: Commercial &amp; Contentious Team</p>	<p>Ongoing</p>	<p>The interests of the Government and Crown protected.</p>	<p>Quantity of cases (by number of matters) Quality of advice given (feedback from instructing departments, number of successful appeals)</p>





Help safeguard children and adults at risk	Care proceedings concluded as expeditiously as possible.  Assist Children's Legislation Programme Board.	Civil Division: Safeguarding Team	Ongoing	Support for strategic policy: <i>we will put children first.</i>	Quantity of cases (by number of matters – children and adults) Quality of advice given (feedback from instructing department)  Updated children's legislation in force.
Assist overseas law enforcement agencies	Assistance provided to investigatory authorities from overseas jurisdictions.	Criminal Division: Mutual Legal Assistance Team	Ongoing	High quality advice given in a timely manner.	Quantity of cases (by number of requests handled) Timeliness of assistance given Quality of assistance (feedback from requesting jurisdictions)
Carry out the statutory and customary law duties of the Attorney General	Functions in relation to the Honorary Police complied with. <i>Partie Publique</i> functions performed effectively.	Attorney General  Civil Division: Advice Team Safeguarding Team	Ongoing	Statutory duties complied with.	Timely compliance with all statutory functions

## 9. Monitoring Service Performance – Our Key Performance Indicators

KPI Description	Baseline 2020	Baseline 2021	Reporting frequency
<b>Civil Division</b>			
Provide initial advice within 20 working days of receipt of full file.	Civil Division: Compliance: 94.5% Median: 2 days  Advice Team:	Civil Division: Compliance: 91.8% Median: 2 days  Advice Team:	annual



	<p>Compliance: 96.3% Median: 3 days</p> <p>C&amp;C Team: Compliance: 92.7% Median: 3 days</p> <p>Property Team: Compliance: 94.3% Median: 7 days</p> <p>Safeguarding Team: Compliance: 92.3% Median: 2 days</p>	<p>Compliance: 89.5% Median: 2 days</p> <p>C&amp;C Team: Compliance: 91.4% Median: 3 days</p> <p>Property Team: Compliance: 93.7% Median: 5 days</p> <p>Safeguarding Team: Compliance: 96.9% Median: 1 day</p>	
Royal Assent Memoranda completed and forwarded to the Privy Council via the States Greffe within 10 days of their receipt by the Department after being adopted	Compliance: average 17 days	Compliance: average 17 days	annual
<b>Criminal Division – Criminal Courts</b>			
Initial review of the case carried out by the Lawyer Responsible within 28 days of receipt of the full file.	Compliance: 56.4% Median: 25 days	Compliance: 80.8% Median: 16 days	annual
<b>Criminal Division - MLA</b>			
Urgent cases: initial review within seven days of receipt of Request	Compliance: 50%	Compliance: 100%	annual
Urgent cases: where actionable without further reference to the Requesting Authority, action taken within 14 days of receipt of the Request	Compliance: 100%	Compliance: 100%	annual
Non-urgent cases: initial review within 30 days of receipt of Request	Compliance: 75%	Compliance: 79%	annual
Non-urgent cases: action taken within 90 days of receipt of the Request (excluding any delay in reply from the Requesting Authority)	Compliance: 80%	Compliance: 66%	annual

