

## **Proposal for reform: Introducing Fees in the Employment Tribunals and the Employment Appeal Tribunal**

**Ministry of Justice consultation 29 January – 25 March 2024**

### **RESPONSE**

#### **Introduction**

Just Fair<sup>1</sup> is a UK charity that is working to realise a fairer and more just society by monitoring and advocating for economic, social and cultural rights (ESCR) in the UK. We welcome this opportunity to respond to the call for evidence by the Ministry of Justice on the proposal to introduce fees in the Employment Tribunals and the Employment Appeal Tribunal.

The United Kingdom has ratified the International Covenant on Economic, Social and Cultural Rights which specifically provides for the protection of just and favourable conditions of work<sup>2</sup> and an adequate standard of living<sup>3</sup>. Our consultation response seeks to highlight how these provisions are highly relevant to and must be considered the proposal to introduce fees.

Specifically, we raise concerns about:

- The affordability of the proposed fees, particularly in the context of the ongoing cost-of-living crisis
- The disproportionate impact the fees may have on certain protected groups and low-income individuals and families
- The inadequacy of the fee remission scheme
- The potential barrier to access to justice that this will present
- The flawed approach taken by the United Kingdom Government in assessing the impact of the proposal which risks failures to comply with their rights-based obligations

**Question 1: Do you agree with the modest level of the proposed claimant issue fee of £55, including where there may be multiple claimants, to ensure a simple fee structure? Please give reasons for your answer.**

We do not agree with the introduction of the proposed claimant issue fee. We consider that it is likely to represent a barrier to accessing justice preventing people being able to raise complaints and assert their rights in the first place. We are concerned that this will disproportionately impact on low-income individuals and families. For example, research shows that two in five children in ‘key worker’ families in the North East of England are living in poverty.<sup>4</sup> It is also likely to have a

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<sup>1</sup> <https://justfair.org.uk/>

<sup>2</sup> [International Covenant on Economic, Social and Cultural Rights](#) (ICESCR), Article 7

<sup>3</sup> ICESCR, Article 11

<sup>4</sup> [13.-North-East-Child-Poverty-Commission-Submission.pdf \(justfair.org.uk\)](#) and – [1 in 5 key worker households have children living in poverty | TUC](#)

disproportionate impact on particular groups with protected characteristics such as sex, race and disability and this is likely to be particularly acute when in conjunction with insecure work conditions which has been highlighted as a key driver of in work poverty<sup>5</sup>. For instance, Black workers are disproportionately more likely to work under a zero-hours contract than any other ethnic group.<sup>6</sup>

We also suggest that the premise of the above question is flawed in the characterisation of the level of the claimant issue fee as being ‘modest’. We note the repeated use of the phrase ‘modest level’ throughout the consultation documents in relation to the fees proposed. Labelling something as such, does not make it so. The use of the term ‘modest’ belies a structural failure to reflect on the reality of many people living and working in the United Kingdom in 2024 and indicates a concerning disconnect between those making policy decisions and reality on the ground. For instance, the average household weekly expenditure on food for the year ending 2022 was £56.50,<sup>7</sup> only slightly above the proposed fee.

In this context, the fee is far from modest – it is almost equivalent to the average household weekly food expenditure for an entire week – an essential expenditure. The Supreme Court highlighted in *R (on the application of UNISON) v Lord Chancellor*<sup>8</sup> that ‘[t]he question whether fees effectively prevent access to justice must be decided according to the likely impact of the fees on behaviour in the real world. Fees must therefore be affordable not in a theoretical sense, but in the sense that they can be *reasonably* afforded. Where households on low to middle incomes can only afford fees by sacrificing the ordinary and reasonable expenditure required to maintain what would generally be regarded as an acceptable standard of living, the fees cannot be regarded as affordable.’

In addition to this clear position from the Supreme Court, the United Kingdom is obliged to respect and protect the right to an adequate standard of living.<sup>9</sup> The requirement to pay fees affordable only by sacrificing or limiting expenditure such as the household food budget would jeopardise this. It is further problematic that this ‘real world’ assessment of affordability does not appear to have formed part of the Impact Assessment which focuses on the potential affordability in a far more abstract way.

Furthermore, the recognition in the Equality Statement that ‘data on ET users is limited which impacts our ability to confidently assess affordability of ET and EAT fees, at any level’ indicates that despite assertions to the contrary, in reality, the UK Government has no idea if the fees proposed are modest or affordable.<sup>10</sup> We would argue based on the information highlighted throughout this response that they are neither, and there is a significant risk of a failure by the United Kingdom Government to comply with its rights-based obligations.

Just Fair also expresses concern that the proposed fee is stated to be an attempt at ensuring that the burden on the taxpayer is lessened by a requirement that ‘users’ of the Tribunals and specifically claimants, typically workers, of the tribunal service make a contribution at the point of use – i.e. bringing a claim. We see no corresponding fee proposals for respondents who are typically

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<sup>5</sup> [Submission to UN Committee on Economic, Social and Cultural Rights](#), para. 10

<sup>6</sup> [Submission to UN Committee on Economic, Social and Cultural Rights](#), para. 10 a

<sup>7</sup> [Family spending in the UK - Office for National Statistics \(ons.gov.uk\)](#), figure 2

<sup>8</sup> [\[2017\] UKSC 51](#), para. 93

<sup>9</sup> ICESCR, Article 11

<sup>10</sup> Equalities Statement, para 5.1

employers, and users of the tribunal service. Consequently, we see an imbalance in the proposal as formulated. Workers have a right to seek to enforce their rights when they are breached. Employers owe legal duties to their workers to respect and uphold their legally protected rights. The United Kingdom Government also bears duties in relation to its obligations under Article 7 of the International Covenant of Economic Social and Cultural Rights (ICESCR)<sup>11</sup> to ensure the right to just and favourable conditions of work.

Enforceable and enforced rights are critical to rights realisation in practice. Enforced rights lifts rights from the page and from being theoretical, to being a reality experienced and enjoyed. Furthermore, a robust and effective enforcement mechanism is likely to lead to more proactive rights compliance (and thus enjoyment) as those who owe duties are more likely to fulfil their obligations if they consider there is a realistic likelihood of accountability should they fail to do so. Thus, there appears to be an underlying flaw in the thinking behind the proposal, which is a failure to recognise the overall societal value, rather than burden, of effective enforcement mechanisms for employment rights.

It should also be noted that in the employment context, enforced rights are in the interests not only of workers but also employers who adhere to their legal obligations and who risk being undercut by unscrupulous and unlawful practices. Any burden on the taxpayer and society is caused by unlawful practices, not by workers seeking to have their rights upheld and respected. It is thus entirely proper and of fundamental importance that resources generated through taxes are provided to ensure an essential level of access to justice and enforced rights. It should not be the burden of those whose rights are violated to pay for the system and undertake the work of enforcement as individuals.

A further misunderstanding seems inherent in the thinking, namely a formulation of the idea of a taxpayer who is somehow separate from workers, and indeed trade unions (who are noted in the consultation as having paid the claim issue fee for some claimant under the previous fee regime which was subsequently found to be unlawful by the Supreme Court). Workers are taxpayers. Trade unions pay taxes and are formed by members who are workers who are taxpayers.

We are also concerned that the rationale offered in the consultation that charging fees would be consistent with the approach to charging fees in other courts and tribunals may be misconceived. The relationship between worker and employer is not akin to other types of commercial contractual arrangement. A dispute between worker and employer relates to the enforcing of legally protected rights (often at international as well as national level) in a context of a power imbalance between the two parties. An integral element to the relationship is also that it is a source of income for the worker which is central to the enjoyment of many other fundamental rights, such as an adequate standard of living<sup>12</sup> and health<sup>13</sup> (amongst others) to which the individual is entitled.

Finally, the suggestion in the Impact Assessment<sup>14</sup> that the introduction of fees might help encourage parties to consider early conciliation appears somewhat optimistic. Experience in the previous fees regime demonstrated that employers delayed negotiation to see if a worker would pay the requisite

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<sup>11</sup> [International Covenant on Economic, Social and Cultural Rights | OHCHR](#)

<sup>12</sup> ICESCR, Article 11

<sup>13</sup> ICESCR, Article 12

<sup>14</sup> Impact Assessment, para 19

fees to pursue their claim(s)<sup>15</sup>. It is unclear why that would be different under this fee regime – an employer is as likely to wait to see if a worker will pay the fee to register the claim.

**Question 2: Do you agree with the modest level of the proposed EAT appeal fee? Please give reasons for your answer.**

We repeat our concerns as set out above in response to the proposed (re)introduction of a fee to bring a claim in the Employment Tribunal. We note that the appeal mechanism is an integral element of the administration of justice and the cost an error of law should not be borne by an individual who is seeking recognition and application of their rights.

There is a risk that the only side who may be able to afford appeals will be employers (respondents at first instance). This may result in an imbalance in decision making, particularly critical at appeal level given that this is where precedent is established.

Further, it is not uncommon for claimants to bring claims on multiple grounds – for instance an unfair dismissal which is also alleged to be discriminatory and withheld wages could incur multiple fees on appeal. There is also a lack of clarity in the consultation on how the fee per decision to be appealed would operate – it is not clear if this applies to head of claim, ground of appeal or individual decisions relating to each ground of appeal within heads of claim. This significantly undermines the claims in the consultation that ‘there is clarity around what fees are payable and when’<sup>16</sup>.

**Question 3: Do you believe this proposal meets the three principles set out above? Please give reasons for your answer.**

No, the stated principles of affordability, proportionality and simplicity are not met because the proposal is not affordable, proportionate nor simple in practice.

***Affordability***

In assessing the affordability of the proposal, it is important to remind ourselves that the United Kingdom Government is a duty bearer with responsibility to respect, protect and fulfil rights such as the right to just and favourable conditions of work<sup>17</sup> and the right to an adequate standard of living<sup>18</sup>.

It is claimed that affordability was explored in relation to the development of the fees proposal and that £55 is assessed as generally affordable. The affordability calculation undertaken appears flawed. The assessment that potential claimants have at least three months to raise the fee is also problematic. It assumes that people are aware from day one of the fee, the time scales for bringing tribunal claims and that, for instance, they will have the financial ability to raise fees during a period of time which may relate to acute financial hardship – for instance in the event of a theft of wages or unfair dismissal. Further the period for appealing is shorter – 42 days - and may entail more than one fee if there are multiple orders to be appealed.

According to the consultation documents ‘only those receiving more than £1,520 in gross monthly income or with £4,250 or more in disposable capital would be expected to pay the full fee’<sup>19</sup>. It is

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<sup>15</sup> [2017] UKSC 51, para. 59

<sup>16</sup> Consultation, page 20

<sup>17</sup> ICESCR, Article 7

<sup>18</sup> ICESCR, Article 11

<sup>19</sup> Consultation, page 15

worth noting in this context that a worker over the age of 23, working 35 hours per week at the rate of the 'National Living Wage' would receive a gross monthly income of £1,580<sup>20</sup>. That means that a worker, working full time, earning the lowest legal minimum permitted by law, would be deemed ineligible for full relief from the fees on the basis they earn 'too much'.

Further, the 'National Living Wage' is not a real living wage<sup>21</sup> and concerns have been raised that it does not reflect the real cost of living.<sup>22</sup> Thus it can be argued that it also fails to provide an adequate standard of living or indeed a 'decent living' as required by ICESCR Article 7 (a)(ii). This raises real questions about the adequacy of the affordability assessment carried out in relation to the proposed fees, particularly in the context of the cost-of-living crisis being experienced across the UK at present.

The consultation documents also refer to an assumption of a 12% fee remission rate. It is worth noting that according to research by the Joseph Rowntree Foundation in 2021/22<sup>23</sup>, 8.2% of full-time adult employees were experiencing in-work poverty. This rose to 18.9% for part time employees. Women are statistically more likely, according to the ONS, to be engaged in part time work. Rates of in work poverty rose higher to 21.3% for self-employed, full-time workers and, 25.2% for self-employed part time workers – raising questions about the impact on workers in precarious and gig-style work arrangements who are classified as self-employed. The assumed fee remission rate does not appear to take into account the reality of the scale of low incomes and in-work poverty as experienced in the UK. Given the rates of in work poverty it would be reasonable to assume a far higher remission rate if the rate for relief from fees was set at a level which genuinely considered these factors fully. This however would reduce the income recovered from the fee scheme and undermine further the proportionality arguments for the measure. These factors do not appear to be adequately accounted for and as such there is a real prospect of low paid workers being priced out of justice.

In addition to the issues highlighted above regarding eligibility for relief from fees, the Help for Fees scheme does not appear to properly consider temporary elevations in bank balances – for instance in the event of a redundancy payment (but where the redundancy itself is contested). The requirement that individuals disclose partner income (and that this is taken into account) is highly problematic and is likely to have a disproportionately negative impact on women who on average earn less than men<sup>24</sup>. The fact that a person's domestic partner may have a certain income does not equate to the individual having access to that income. There is an absence of clarity on the timescales and the evidential burden required for completion of the Help with Fees process. This alone may act as a barrier to accessing justice and introduce further hurdles and difficulties for potential claimants. Given that it is said in the Equalities Statement that 'The Help with Fees (HwF) scheme is crucial in supporting the Lord Chancellor's duty to protect the constitutional right of access to justice...' the concerns raised in this response are of critical significance.

The reliance on the option of the Lord Chancellor's Exceptional Power to remit fees as a safety net to ensure access to justice would appear highly aspirational. In addition to being rarely used according

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<sup>20</sup> This figure is based on the 2023/24 rate of £10.42. This is due to increase to £11.44 in April 2024 making the issue all the more acute.

<sup>21</sup> [Submission to UN Committee on Economic, Social and Cultural Rights](#), para 11 a

<sup>22</sup> [Submission to UN Committee on Economic, Social and Cultural Rights](#), para 11 a

<sup>23</sup> [UK Poverty 2024 - charts.xlsx \(live.com\)](#)

<sup>24</sup> [Gender pay gap means women work for free for two months of the year – TUC | TUC](#)

to Supreme Court in *R (on the application of UNISON) v Lord Chancellor* there is also the very important and real question of how many claimants (particularly unrepresented individuals) would be aware of the existence of this power and be in a position to advocate for it. As a result it is difficult to see how it can serve the purpose of helping 'to ensure equality of opportunity is advance for those with protected characteristics who cannot otherwise afford to pay fees.'<sup>25</sup> It is notable, as is recognised in the consultation itself, that under the previous fee regime, subsequently found to be unlawful by the Supreme Court, claimants were 'more likely to have been a manager, director or senior official'. It is unclear how the foreseeable inequality of access to the tribunal system linked to income, will be prevented under the proposed fees scheme.

### **Proportionality**

As noted in the consultation, 'the cost of the fee should be proportionate to the remedy being sought, to avoid making the pursuit of a claim irrational and futile'. According to the analysis there is evidence to indicate that 'claimants whose claims have merit would generally expect any pay-out to more than cover their fees.'

There are two flaws inherent in this argument. Firstly, the use of the language of 'pay outs' is pejorative and diminishes the significance and indeed meaning of what such financial payments represent in the context of the employment tribunal system. 'Pay outs', to use the language of the consultation, are awards by the Tribunal of compensation for a violation of the claimant's employment rights. It is unclear how it can be justified that compensation awarded in circumstances of a rights violation ought to subsidise the financial cost of bringing such action.

Secondly, the claim that claimants whose claims have merit would receive compensation is not correct in all cases. Specifically, there are a number of claims which do not give rise to financial compensation but are fundamental in the protection of the rights of workers and indeed may be critical in the establishing of other rights. For example, the right to a statement of particulars of employment which sets out key rights such as hours of work, pay, holiday entitlement etc<sup>26</sup>, the right to an itemised pay statement<sup>27</sup> or the right to time off to attend antenatal appointments<sup>28</sup> which is a fundamental right in pregnancy with significant right to health implications as well as rights in the employment context.

### **Simplicity**

The arguments put forward in relation to simplicity are difficult to understand. It is not clear how the proposals strike the balance sought between a contribution to the running of the system by users and informed decision making. As noted throughout this response the proposals disproportionately impact claimants - those seeking to enforce their employment rights – rather than employers who owe obligations and as such the characterisation of users of the system appears extremely one sided.

The intention to 'recoup part of the running costs of the service without over-recovering' is certainly met in the sense that there appears to be little danger of over-recovery given that the fees are projected to meet a tiny fraction of the running costs of the tribunal service. What is concerning about this is that the potential impact on claim numbers, even on the UK Government's own

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<sup>25</sup> Equality Statement para 6.10

<sup>26</sup> Employment Rights Act 1996, s.1

<sup>27</sup> Employment Rights Act 1996, s. 8

<sup>28</sup> Employment Rights Act 1996, s. 55

estimation could be very significant – as much as 20% (albeit with very little clarity on how this figure is reached). This is deeply concerning from an access to justice perspective. It would appear reasonable to infer that the most logical explanation for the estimated 20% drop in claims would be the application of the fees regime – it is not the case that the claims are predicted to drop because there is suddenly 20% greater rights compliance.

Furthermore, this ‘sacrifice’ of 20% of claims is to recover between 1.5 and 1.89% (or approximately 1.64% over 10 years) of the costs of the service. This raises the real concern and prospect of low-income workers in particular being priced out of justice and excluded from the framework for enforcing their rights. Protected rights should not be the preserve of the privileged who can afford to pay for justice. Employers should not be able to ignore basic rights protections because they know that their low paid work force cannot afford to enforce them. The United Kingdom Government must remain cognisant of its role in respecting, protecting and fulfilling these rights.

It should also be noted that there are already pre-existing barriers to justice such as the under resourcing of the justice system generally, a lack of labour inspectors and proactive rights enforcement and protection, extensive delays in the employment tribunal service in the disposal of claims, the lack of legal aid provision as well as advice deserts in parts of the UK and low levels of ET award enforcement.

**Question 4: Do you consider that a higher level of fees could be charged in the ET and/or the EAT? Please give reasons for your answer.**

No, for the reasons set out in this response we do not consider that fees should be introduced in the ET or EAT at all. This precludes fees at the level proposed or any other level.

**Question 5: Are there any other types of proceeding where similar considerations apply, and where there may be a case for fee exemptions? Please give reasons for your answer.**

For the reasons set out in this response we do not consider that fees should be introduced in the ET or EAT at all. Consequently, we suggest there should be full exemption from fees for all claims issued in the ET and appeals made to the EAT.

We would be concerned by any attempt to introduce a cost or fee regime by stealth in the employment tribunal, particularly in the absence of adequate access to justice measures such as legal aid and robust enforcement of settlement agreements and tribunal awards. It is vital that the state ensures access to justice and seeks to avoid and remove barriers to justice ensuring compliance with its international human rights obligations enshrined in ICESCR and International Labour Organisations (ILO) standards.

**Question 6: Are you able to share your feedback on the different factors that affect the decision to make an ET claim, and if so, to what extent? For instance, these could be a tribunal fee, other associated costs, the probability of success, the likelihood of recovering a financial award, any other non-financial motivations such as any prior experience of court or tribunal processes etc. Please give reasons for your answer.**

The ability to make an ET claim and appeal a decision where there has been an error of law is an important accountability mechanism which transforms rights from the theoretical to rights enjoyed in practice. However, this is dependent on a number of other factors in place and working to ensure access to justice and realisation of justice. These include rights knowledge, rights frameworks, rights resourcing, rights accountability and rights enjoyment<sup>29</sup>.

Rights knowledge and education are core underpinning concepts in protecting rights. This knowledge and education should be about both the rights themselves and the structures and processes that relate to them. It is critical that people know that rights exist in the first place. When something goes wrong, route(s) to remedy must exist as part of rights frameworks. Routes to remedy must be designed to be accessible and participative, so that barriers are minimised. Where expert knowledge is required, advice and advocacy must be available and accessible to all and in a timely way. Rights must be substantively and proactively resourced so that the UK Government makes the best use of available resources to ensure enjoyment of economic, social and cultural rights of people living in the UK.

As such, accessible complaints and monitoring mechanisms must be resourced so that people can seek redress and changes, provision of routes to remedy form an integral part of accountability mechanisms. Such accountability mechanisms need careful consideration to make sure they work well in practice so that routes to remedy are effective. The absence of or inadequate protection or provision of any of these elements has an impact on the ability of people to make complaints and assert their rights. The introduction of fees to access justice which serve as a barrier and result in a decrease in claims being made is not consistent with the principle of appropriately resourced and accessible complaints mechanisms and accountability.

As previously noted, there are already pre-existing barriers to justice in the employment context such as the under resourcing of the justice system generally, a lack of labour inspectors and proactive rights enforcement and protection, extensive delays in the employment tribunal service in the disposal of claims, the lack of legal aid provision as well as advice deserts in parts of the UK and low levels of ET award enforcement. The (re) introduction of Tribunal fees adds a further potential barrier to accessing justice.

**Question 7: Do you agree that we have correctly identified the range and extent of the equalities impacts for the proposed fee introductions set out in this consultation? Please give reasons and supply evidence of further equalities impacts as appropriate.**

No, even on the UK Government's assessment it appears clear that the proposal is likely to have disproportionate effect on many protected groups. Additionally, the equality statement assessment is based on data on protected characteristics of ET claimants from 2013 – before the Covid-19 pandemic, Brexit, welfare and immigration law reforms, the current cost of living crisis and the most recent census. As one example – the percentage of working age people who are disabled has risen from 17 to 23% since 2013.<sup>30</sup> Consequently, it is not unreasonable to infer that the discriminatory impacts are likely to be even more significant for some protected groups. The reliance on old and out of date data is not acceptable and the Equality Statement is significantly deficient as a result.

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<sup>29</sup> This is drawn from Just Fair's work on [5 Principles for Economic, Social and Cultural Rights Justice](#).

<sup>30</sup> [Costly differences • Resolution Foundation](#)



There has been a failure to adequately consider the impact on workers in precarious work conditions (such as those on zero hours contracts), migrant workers (who in the 'hostile environment' era face greater precarity and risk of exploitation), pregnant workers and new parents. There appears little consideration of the impact on young people who may experience additional barriers in relation to increase work precarity, lack of rights knowledge and confidence asserting their rights and barriers to qualifying for relief from fees<sup>31</sup>.

As noted above, the repeated description of the fee as a 'modest fee' demonstrates a failure to consider the real impacts of poverty and the cost-of-living crisis experienced by many low paid workers and is also shown to have a disproportionate impact on people of colour, women and disabled people for example<sup>32</sup>. We reiterate that the United Kingdom is obliged to respect and protect the right to an adequate standard of living.<sup>33</sup> The requirement to pay fees affordable only by sacrificing or limiting expenditure would jeopardise this. It is further problematic that this 'real world' assessment of affordability as formulated by the Supreme Court in *R (on the application of UNISON) v Lord Chancellor*<sup>34</sup> does not appear to have formed part of the impact assessment which focuses on the potential affordability in a far more abstract way.

Furthermore, the recognition in the Equalities Statement that 'data on ET users is limited which impacts our ability to confidently assess affordability of ET and EAT fees, at any level'<sup>35</sup> indicates that despite assertions to the contrary, in reality, the government has no idea if the fees proposed are modest or affordable. We would argue based on the information highlighted throughout this response that they are neither and there is a significant risk of a failure by the United Kingdom Government to comply with its obligations to uphold rights enshrined in ICESCR and ILO standards.

## Conclusion

For all the reasons highlighted above, Just Fair is concerned that the proposal to (re)introduce fees in the ET and EAT amounts to a barrier to accessing justice which will leave people at risk of increased exploitation and employment rights violations with negative consequential effects for their enjoyment of other rights including, but not limited to, those set out in ICESCR and ILO standards.

We take this opportunity to remind the United Kingdom Government of its role and obligations as a duty bearer in relation to employment rights. The submission to the Pre-Sessional Working Group of the UN Committee on Economic, Social and Cultural Rights drafted on behalf of civil society by Just Fair highlights that there are significant existing concerns regarding compliance with these duties<sup>36</sup>.

The introduction of fees which serve as a barrier to justice and enforcement of employment rights will exacerbate these concerns and potential rights non-compliance. Consequently, we urge the UK Government to reconsider the proposal and encourage abandonment of the plan to introduce the proposed fees in order that the Employment Tribunals and Employment Appeal Tribunals are 'accessible for all'<sup>37</sup>.

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<sup>31</sup> [Young people's experiences of precarious and flexible work – Evidence Review - gov.scot \(www.gov.scot\)](http://www.gov.scot/Young-people's-experiences-of-precarious-and-flexible-work-Evidence-Review)

<sup>32</sup> [Submission to UN Committee on Economic, Social and Cultural Rights](#)

<sup>33</sup> ICESCR, Article 11

<sup>34</sup> [2017] UKSC 51, para. 93

<sup>35</sup> Equalities Statement, page 5.1

<sup>36</sup> [Submission to UN Committee on Economic, Social and Cultural Rights](#)

<sup>37</sup> Impact Assessment, page 1

## Further information and contact

Just Fair: [www.justfair.org.uk](http://www.justfair.org.uk)

Charity number: 1141484; Company number: 07394478

Kate Ewing, Researcher

[kate.ewing@justfair.org.uk](mailto:kate.ewing@justfair.org.uk)