

Initial Equalities Impact Assessment For the Manchester CLA Services Funded by the Legal Services Commission and Manchester City Council

Introduction

Manchester is made up of rich and diverse communities. The provision of mainstream services needs to reflect the needs of, and be accessible to, all Manchester residents. Equality Impact Assessment (EIA) is a process which considers all current and proposed activities and policies to ensure that these do not disadvantage anyone on the basis of disability, ethnicity, gender, age religion, or sexual orientation.

An EIA allows us to assess whether a policy or proposal is likely to have an adverse effect and if so to identify what changes we need to make to the proposal to avoid unlawful discrimination. The EIA process also enables us to demonstrate the potential benefits for equality target groups arising from a proposed policy or project. It also identifies where our policies and activities can be more effective in promoting equality of opportunity and positive attitudes and to build good relations between different groups, which is underpinned by the consultation and involvement of external stakeholders.

This Initial Equalities Impact Assessment (IEIA) primarily looks at the potential equality impact of the proposed tendering of CLAS on race, gender and disability by bringing together evidence from the following reviews, consultations and strategies

- A major independent review of advice services in Manchester
- A consultation process to lead to the re-commissioning of community legal advice services (The Case for Change)
- Consultations on pre-specification and draft specification
- Tender document- equality and diversity (section 2.3), and monitoring and customer survey (section 5.1) are part of the tendering requirement
- LSC research and experiences from other regions where LSC supports similar CLAS
- Manchester's community strategy in which ensuring customer and neighbourhood focus, and equality of opportunity in employment and service provision is one of the 10 key priorities

All documents are available on [www.mba4consultancy.co.uk/mba CurrentWork.asp](http://www.mba4consultancy.co.uk/mba_CurrentWork.asp).

We welcome any comments you have on this IEIA and any information you may have which can help us improve our assessment. Please send all comments to manchester@mbarc.co.uk by 12noon Tuesday 9th March 2010.

Background

After a major independent review of advice and legal services for Manchester, the Legal Services Commission (LSC) and Manchester City Council agreed to develop a new model to jointly commissioning Community Legal Advice Services (CLAS) in the City. This was followed by a launch of a consultation process with focus on the case for change (C4C), the commissioning intentions and key questions for the pre-specification consultation for the tendering of the CLAS in Manchester. All these processes, procedures, policies and strategies have been carried out with due attention for equality and diversity.

Manchester City Council is committed to conducting EIAs on all its services, policies and functions. As part of fulfilling its key requirement for progress against the Equality Framework for Local Government (EFLG) and to comply with the authority's duty on gender, race and disability, Manchester City Council has developed an initial equality impact assessment framework.

This is not a conclusive analysis, but an analysis of what we expect the service to look like once it is in place. It is our intention that throughout the life of the contract, an EIA review will take place at regular intervals in order to ensure that the service continues to be relevant to and not discriminate against any member Manchester residents. As a result the EIA will shape and influence a full Equalities Impact Assessment on the Manchester Community Legal Advice Services.

The following sections set out the initial equality impact assessment, assessing the policies/projects for relevance to the equality strands and the impact on the equality strands:

1. Name of the policy/project to be assessed (Policy can include practice, service or procedure)

The tendering of the Community Legal Advice Services in Manchester

2. Provide brief summary of the policy/project including aims. What are the intended outcomes?

Following a major independent review of advice and legal services in Manchester, the need for MCC to work with other funders has been one of the top-line recommendations leading to LSC and MCC jointly commissioning CLAS. Manchester City Council (MCC) and the Legal Services Commission (LSC) are tendering for, and jointly funding, new Community Legal Advice Services (CLA Services) in Manchester.

The overarching aim of the Services is to help ensure that clients are able to get help with their civil legal problems from one easily accessible and identifiable source. Pivotal to the success of the Services concept is the intention to design services around peoples needs. A major independent review of advice and legal services in the city commissioned by MCC review highlighted the essential role that advice and legal services play in tackling social exclusion and deprivation, but also identified that these were being provided in an un-coordinated and fragmented way and that despite considerable investment by MCC there was significant unmet need. Working in partnership, Manchester City Council with the Legal Services Commission will develop services in six geographical areas with three contracts being awarded to provide "On site" advice to customers; combing both civil legal aid advice and social welfare advice under one roof.

The Joint Commissioning Project aims to:

- Purchase all five Social Welfare Law categories (community care, debt, employment, housing, immigration to OISC level 1 and welfare benefits):
 - As a bundle
 - In defined geographical locations (new procurement areas)
 - According to a specification informed by local needs
 - Under three contracts.

- Join up with or purchase family services, as appropriate
- Confirm LSC funding levels for each procurement area using a national funding formula that ensures more consistent legal service provision across England and Wales and which reflects the level of need in each area.
- Jointly commission Community Legal Advice services with other funders of legal advice and representation.

Project objectives for phase 1 (up to 31 March 2010):

- Develop a service specification for Community Legal Advice services.
- Establish an approach to procuring Community Legal Advice services and develop the tools to support this (ongoing).
- Establish an approach to delivering Community Legal Advice services to clients of other advice services (ongoing).

Manchester City Council and the Legal Services Commission jointly aim to establish services in Manchester which will:

- *Meet the needs of clients based on a clearer understanding of local need;*

Both the MCC and the LSC's systems of funding have been based on historical data rather than current patterns of need, resulting in areas of the city where need is high but provision is limited. This service aims to capture and assist clients based on their need; meeting the needs of those who needs were otherwise unlikely to be met because they are disproportionately less likely to use the service and those who need advice in areas of law which are less likely to be provided for.

- *Provide improved accessibility to clients;*

Alongside ensuring that services are physically and geographically accessible to people in most need, we also aim to tackle other challenges in relation to accessibility, including ensuring services are compliant with disabled access legislation. The service will also redress challenges faced by those who struggle to access services due to factors such as long term waiting times and limited out-of-office hours opening. The service will also aim to meet needs based around those who do not have English as their first language and others who face social exclusion. Furthermore, we wish to ensure that the service is promoted amongst problem noticers who can often act as the gateway to mainstream services for those clients who may otherwise be deemed "hard to reach" or who may not be aware of the services that the CLA services are able to offer.

- *Ensure better integration between service providers and efficient management of the referral process;*

There is some evidence of referral between advice agencies; however this does not appear to be systematic. The aspiration should be for the individual to receive the right advice at their first port of call wherever possible, or to be actively referred to an alternative provider. The CLA Services will ensure a coherent referral process so that clients receive the necessary advice.

- *Assist with better prevention and early intervention of legal problems;*

Few agencies currently have the resources to target resources towards better prevention of problems and early intervention. The result of this is that cases become more complex adding distress to the service user and costs to the advice service. The CLA Services aims to aid the prevention of further problems by identifying and addressing issues that are repeatedly causing problems for clients.

- *Provide an integrated service to tackle complex, multiple problems at an early stage;*
The Service will provide an accessible generalist and specialist legal advice and representation service for clients across Manchester. Services will be delivered in such a way as to enable accessibility for all residents seeking advice, particularly in those geographically isolated and deprived areas of Manchester.

- *Provide an improved funding opportunity for providers;*
Both the MCC and the LSC's systems of funding, whilst providing resources over many years, have restricted the capacity of providers to make long-term investments in developing their services. The move to joint commissioning with three year contracts provides a significant case for change, allowing providers to plan their services with confidence, develop long term business planning and risk management and allowing commissioners to target resources to meet needs. This will also allow for greater investment in workforce development.

- *Assist in achieving the City's wider social problems;*
The CLA Services will be part of the City's wider change programme and will contribute to tackling worklessness, addressing child poverty, promoting financial inclusion and maximising income of Manchester's residents.

3. Who is affected by the policy/project?

- Providers (and potential providers) of family and social welfare law services in Manchester, both those providing services funded by legal aid and those funded by the Council. This includes solicitor firms, not-for-profit organisations and other commercial organisations.
- Residents of the City of Manchester, including clients and potential clients of the above.

The following organisations are indirectly affected by this policy:

- Voluntary and community groups with an interest in the delivery of legal advice:
 - Those who have a role in helping people to access legal advice services
 - Those who represent particular communities or groups who will be able to advise in the designing of services e.g. identifying unmet needs.
- Council services with an interest in legal advice e.g. housing services, revenues and benefits, Manchester City Council in-house advice services.

Some of these organisations may be affected because they will be working with the service e.g. to make referrals, however they will not be directly affected because their services are not being included as part of the tender. Therefore they will not be considered further in this Equalities impact assessment.

4. Do you have evidence that tells you how the policy/project is working?

Yes, evidence has been provided through the consultations on the needs assessment, commissioning process and service specification for CLAS in Manchester. Further evidence will be available once the service is in place (the project has not yet been

implemented).

Policy model

The review of advice services in Manchester has established that the City Council should work with other key funders and current advice providers to develop an advice strategy. This strategy should make clear and explicit links to the contribution that advice services are expected to make to the City's (and other funders) wider corporate objectives.

Similarly recent research by LSC shows that the nature of existing advice provision, including those services funded by the LSC, are not always focused on the needs of clients. Specifically, the Legal Services Research Service's national civil law and social justice survey found that:

- Civil justice problems often lead to further problems and commonly occur in defined clusters
- Those experiencing the most problems were likely to be socially excluded
- Only about half of those who have problems seek legal advice
- 1 in 7 people who try to get advice fail to do so, mainly because the adviser couldn't help; and
- The more times a person gets referred on, the less likely they are to continue seeking advice.

The aim of CLA services in Manchester is to address these issues by providing accessible, quality-assured, client-focused services that provide:

- The range of social welfare law (SWL) services (which cover community care, debt, employment, housing, in-house advice services and welfare benefit issues)
- Family law services
- Related public law services
- End-to-end services, from the basic diagnosis of problems through to litigation.

Key benefits of this approach

From the perspective of Manchester City Council, the Council investigated various options for funding advice services across the borough, but determined that the CLA Service model proposed by the LSC offered the most appropriate way of integrating general help and specialist level advice services with both existing in house services and any new services that they intended to develop as a result of delivering the Community Strategy.

Other key benefits for both funders include:

- Community Legal Advice services are designed around the needs of the local community and make getting legal help on civil matters easier.
- These services will help as many people as possible (within the constraints of the resources made available) and in particular will aim to help those who fail to seek advice for their problems and those who find it more difficult to access services.
- Recognising that clients frequently experience multiple problems, these services will deliver help in all areas of social welfare law – community care, debt, employment, housing and welfare benefits – as well as family advice and related public law.

- People can receive a full range of civil legal and advice services – from basic information to legal representation - from the new Community Legal Advice services.
- Where possible, these services will take strategic action to solve the causes of common local problems and will play an important role in educating people about their legal rights.
- If the service is not able to help, it will refer the person to other local sources of help, arranging appointments where this is possible.
- Because social welfare and family problems are frequently linked, ultimately all Community Legal Advice services will either provide or link directly to local family services.

Progress to date

- To date MCC have implemented a major review of advice services in Manchester, agreed to jointly commission CLAS in Manchester, held consultations on the draft specification and worked closely with LSC benefiting from their experiences with other Local Authorities in Derby, Gateshead, Hull, Leicester and Portsmouth.
- This joined up approach to the procurement of advice services has been welcomed and supported by many Local Authorities. To date five Community Legal Advice Services have been established in partnership with Local Authorities in Derby, Gateshead, Hull, Leicester and Portsmouth. There are four services, including Manchester, which will begin operating in 2010 and the LSC are currently in negotiations with numerous other Local Authorities with a view to setting up further Community Legal Advice services in the near future.
- The first 5 CLA Services have already provided improved services for local clients. Only one of the areas, Derby, carried out all five categories of Law before the Community Legal Advice Service was set up, meaning that clients in these areas are now able to obtain advice in areas of law not previously available. In Portsmouth the CLA Service offers specialist advice services in Employment and Community Care, categories that were not delivered locally prior to the development of the new advice Service. In addition, there was also an increase in terms of actual clients seen, in Hull, for example, the opening of a CLA Service has increased the number of matter starts available for clients in social welfare law categories by around 30%.

Taking the policy forward

- The initial phase of Community Legal Advice Services will help inform us of the best ways of delivering and commissioning integrated social welfare law and family services
- The LSC and MCC will continue to learn from and build on the lessons learned from the first CLA Services that were developed including Manchester. A comprehensive 'lessons learned' log is kept updated by the LSC's Social Welfare Law Policy team and is continuously monitored so that the delivery of future projects can be improved.
- The Legal Services Research Service (the independent research division of the LSC) are responsible for carrying out research into, the process of setting up Services and

networks from both a provider and a funder perspective; and the advice process and outcomes for clients using the services. The research findings will be published at the end of 2009.

Needs Analysis

The evidence of need, which has been included as part of the Needs Analysis for the Manchester CLA Service, brings together relevant data on the local demographic make-up and need for advice in Manchester and also considers what provision is in place currently. The evidence of need has sought to identify the potential need for legal and advice services within Manchester focussing on priorities client groups and categories of law

- As such, the specification has been drawn up to develop services (as far as is reasonably possible) in a way that will best meet clients needs in a way and through locations that are relevant to how and when they wish to access services.
- Both Manchester City Council and the Legal Services Commission are keen to ensure that as far as is reasonably possible, we include everyone interested in funding, delivering and using legal advice services in all aspects of the planning process; we seek to obtain as much information and comment as possible by utilising open and robust consultation processes for reviewing the documentation towards the service. Comments and suggestions received following consultations on the Needs Analysis and the draft service specification will enable the funders to obtain the best service given the funding available. We accept that the project will evolve over the lifetime of the contract and we will endeavour to ensure that any learning gained from this initial contract is fed into the designing of any subsequent contracts that may be tendered in the future.
- In addition the LSC and MCC collects management information on the take up and usage of legal aid services and the cost of these services, which are monitored through Key Performance Indicators (set out in clause 10 and Annex G of the Unified Contract (Civil)). The Centre contract will build on this and require reporting of additional management information, which will tell us if the Centre is delivering the required service (as set out in the service specification) and responding to local need.

Service Delivery

- Current LSC funded services are quality assured and measured through the Quality Mark and Peer Review processes with services currently required to obtain Peer Review 3 as the minimum threshold standard. Once the contract has been awarded the LSC will (in partnership with Manchester City Council) audit against these quality assurance standards
- It should be noted here, that we are not requiring agencies to have either the Quality Mark or have been Peer Reviewed prior to the awarding of this contract because we wish the tender process to be as open as possible, allowing opportunities for those organisations who do not currently have a contract with the Legal Services Commission and/ or who are not in receipt of funding from Manchester City Council to be able to participate in the tender process.
- Client experience will be improved in many ways; perhaps the most significant change will be the ability for a CLA Service to assist clients facing a range of issues and problems without the need for external referrals. This will mean that clients can get all

the legal help and advice they need from one local service and will minimise the potential for 'referral fatigue' whereby clients who are referred on from one organisation to another become despondent and fail to pursue their case. Client feedback from existing CLA Services has shown that by providing an integrated service CLA Services are much better placed to assist with the complex and interrelated problems that people often face than any arrangements that were in place previously

5. From the available evidence, does the policy/project have relevance for the equalities strands and groups listed below? Is the policy assessed as of high, medium or low relevance to equality?

For each strand it has been considered whether the policy/project affects people differently, whether it unlawfully discriminates, whether it will affect relations between groups of people and whether any stakeholder feedback has indicated that the policy/project may cause exclusion or hold specific challenges. Table 1 below summarises the conclusions.

Table 1 Summary

	Yes	No	Not Known	High	Medium	Low
Age	✓			Y		
Disability	✓			Y		
Gender	✓			Y		
Race	✓			Y		
Religion or belief	✓					
Sexual orientation			✓			
Impacts on Clients	✓			Y		
Impacts on Providers	✓			Y		
Impacts on Staff	✓			Y		

The award of Community Legal Advice Service contracts has been assessed as having a high relevance to age, race, disability and gender and will have impacts on providers, clients and staff. This assessment therefore applies to the Manchester CLA Service.

The review of needs was undertaken in conjunction with this document, Manchester's State of the City report and the Service Specification. This was done by reviewing all relevant published documents from statutory agencies covering or based in Manchester, along with any relevant management information that either the LSC or Manchester City Council hold.

General Population and social information:

Manchester has experienced very significant growth in the past few decades. The city is a hub of business, investment, education, culture and community activity, which rivals any other city in the UK outside London.

Projections show the city's population continues to rise. The mid-year estimate in 2007, the latest figure available, shows Manchester's population is now 458,100. This is an increase from 452,000 in 2006.

Manchester has a strong employment base, with 310,000 people employed within the city in 2007, an increase of 16% in just under a decade. The majority of the city's employees are employed in the financial services sector, closely followed by sales-related and health sectors.

The unemployment rate in Manchester, a measure of residents in receipt of Jobseeker's Allowance (JSA) as a proportion of the working-age population, fell to its lowest level (3.3%) in late 2007. However, Manchester, like other cities, is currently feeling the effect of the economic downturn. Since June 2007 there has been a reduction in the employment rate, which is also being experienced across the sub-region and the northwest. The rate has started to increase and is currently around 5.1% (as at February 2009). This is higher than the sub-regional and national rates of 4.4% and 3.9% respectively. However, Incapacity Benefit, which does not require the recipient to seek work, is around three times higher than the Jobseeker's Allowance (JSA) benefit, which does require the recipient to actively seek work.

Age:

Male life expectancy in Manchester remains the second lowest in England, and female life expectancy is the fourth lowest in England.

The older people living in Manchester are amongst the poorest in the country, with issues of ill health and relatively low life expectancy. As a result there are significant challenges facing older owner-occupiers.

5% of the Households in Manchester are single parent families, this compares to 3% nationally.

This will mean that the service will have to provide for the advice needs of lone parents, older persons' welfare benefits and associated issues, and also advice on community care.

Disability:

According to the Department for Work and Pensions, 32,040 claimed Disability Living Allowance Claimants in 2007/2008. At 8% of the population, this stands at almost twice national average (4.6% nationally).

While significant progress has been made with regard to equality for disabled people, barriers still remain. Access to education, employment, housing and transport on an equal level with non-disabled people is still not a reality for many disabled people. This means that the advice needs of people with disabilities will be important, e.g. welfare and

community care issues. Also, there is a need to ensure services are accessible to people with disabilities

Race:

The ethnic make-up of Manchester continues to become more diverse and the ethnic minority group (EMG) population is growing. According to mid-2003 ONS statistics, 79% of the population of the city of Manchester is White British. At 21%, all other ethnic minority groups living in Manchester are more than double the proportion nationally. 10% are estimated to be Asian or Asian British, 5% Black or Black British, 3% of mixed ethnicity and 3% are classed as 'other' ethnicity.

It is believed that there are around 1,085 Asylum seekers in Manchester (2006), with an estimated 20,000 refugees in residence in the city. So far, there is little information available on accession eight countries.

Large BME communities often have higher levels of need for advice; this will have an impact on community access issues, language barriers in accessing advice, potential implications for translation facilities, general social welfare issues and advice related to immigration and asylum. Community Legal Advice services will be expected to work closely with providers of specialist immigration/asylum advice in the sub-region (OISC Levels 2 & 3).

Gender:

Just over half (51%) of Manchester residents are male, whilst 49% are female.

Table 2 Gender by age

Age	Males	Females
0-14	17%	17%
15-24	20%	21%
25-34	21%	28%
35-44	14%	13%
45-54	10%	10%
55-64	8%	8%
65-74	5%	6%
75 plus	4%	7%
All ages	100%	100%

The pay gap between men and women in Manchester, based on their median weekly wages, shows men earned on average 12% more a week than women (2008 data).

Between 2006/07 and 2007/08 the number of reported incidents of domestic violence in Manchester rose from 13,262 to 15,869. Recent figures for 2008/09 show there has been a 7% increase in reported domestic violence incidents in Manchester: 17,193.

Table 3. Religion:

Religion (all people)	Value	Eng & Wales Rank/376	Regional rank/43
Christian	245203	344	43
Buddhist	2144	27	1
Hindu	2849	80	4
Jewish	3076	31	4
Muslim	35806	23	5
Sikh	1708	64	3
Other	1111	136	1
No religion	62744	128	1
Religion not stated	38178	12	1

Health:

Mortality rate – 840 per 100,000 compared with 634 nationally. The health of Manchester's residents is amongst the worst in the country. Life expectancy is increasing, but is still under the rest of the country (especially for men, whose average life span is four years less than the national figure). Mortality rates are considerably higher, and the suicide rate is the highest in the country, reflecting deprivation, living environment and life style.

12% of the population rates their Health 'not good', whilst 22% have long term illness, 3% and 4% above the national average. The teenage pregnancy rate is 65 per 1,000 compared to 41 per 1,000 nationally.

This again raises general welfare issues and ensuring services are accessible.

Impacts on Clients

Services will be available to all local residents, regardless of race, age, gender, disability, religion and sexual orientation. Providers will be expected to deliver and market the service in ways and in places that directly respond to the requirements of the local population, particularly the priority groups identified.

Manchester, which identifies particular groups that should be a priority for the service because they are more likely to have a justifiable problem and/or because they face barriers accessing advice. The priority groups identified from the Service Specification are (in no particular order):

- The unemployed
- People on low incomes
- People with long term illness or disability
- Young people (particularly those leaving care or in contact with YOT)
- Older People
- Gypsy/traveller communities and migrant workers
- Victims of violence, including domestic abuse
- Single parents

However, the number of people from BME communities forms part of the advice needs multiplier and BME needs are specifically identified in the needs assessment. Also section 2.3 of the tender specification recognises that black and minority ethnic communities are currently concentrated in certain parts of Manchester, and bidders need to respond to community needs as they evolve.

The priority groups identified are taken from the service specification and will ultimately go into the contract schedule that will require the service to target these priority groups. The service will have a performance standard relating to targeting such priority groups.

In Manchester services will be provided through 3 contracts of six outlets. Each contract will cover two of the six districts of Manchester. These are:

- South District and Wythenshawe District: covering the wards of Burnage, Chorlton Park, Didsbury East, Didsbury West, Old Moat, Withington, Baguley, Brooklands, Northenden, Sharston, Woodhouse Park
- Central West District and Central East District: covering the wards of Chorlton, Fallowfield, Hulme, Moss Side, Rusholme, Whalley Range, Ardwick, Gorton South, Gorton North, Levenshulme, Longsight
- North East District and North West District: covering the wards of Ancoats and Clayton, Bradford, City Centre, Miles Platting and Newton Heath, Charlestown, Cheetham, Crumpsall, Harpurhey, Higher Blackley, Moston

Please see Annex 1 for a map illustrating the above.

Outreach services will also be delivered, based on local need.

The value of contracts will be broadly similar but adjusted to reflect both population size and levels of deprivation. The following is an example of how these may look but is not an indication of the contract volumes.

- | | |
|---|-------|
| • South and Wythenshawe District | 34.6% |
| • Central West and Central East District | 35.5% |
| • North East District and North West District | 29.8% |

We have also identified each of these areas as having their own set of particular needs. The following information is an indication of the levels of deprivation in each service area, and is analysed by reviewing a selection of the wards within the area:

- In South and Wythenshawe District, in Woodhouse Park ward, 56.8% of residents live in Social Rented Accommodation compared with Manchester total of 39.4%. 26.1% of its population are registered as having Long term limited illnesses, compared with a national average of 18%. Comparatively, Sharston Ward also contains a high number of Single parent, social rented accommodation and residents living with Long term limited illnesses, at 15.8%, 54.3% and 23.3% respectively
- In Central West and Central East District, Ardwick, Hulme, and Moss Side wards all have higher than average levels of need. In Ardwick, the BME population is more than double the national average at 39.6%, the rate of unemployment is more than

triple the national average at 16.5% and with 66.1% of residents living in Social rented accommodation, the ward also has the highest amount of social housing in the City. Hulme ward has the second highest percentage of social housing at 65.4% and more of its residents are both BME and unemployed than the national average at 31.8% and 12.3 respectively. Moss Side has the second highest percentage of both unemployed residents and single parent families in the city, at 14.8% and 15.9% respectively

- In North East District and North West District, Miles Platting and Newton Heath Ward records higher than percentages of single parents, BME population, the unemployed, residents living with long term limited illness and social housing accommodation, with BME and Long term limited illness residents more than double the average. The wards of Ancoats and Clayton have a single parent population of 16.3%, compared with the national average of 9.5%. There are also much higher the national average percentages of unemployed residents, BME residents and residents living with Long term limited illnesses. Harpurhey ward has the second to highest number of residents with Long term limiting illnesses at 27.1%. The ward also has an unemployed population of 11.3%, more than double the national average of 5.5%. Cheetham's BME population of 48.7% is almost triple the national average of 17%, 13.7% of its residents live with a Long term limiting illnesses.

The CLA service will aim to help all residents of Manchester. However, some geographic areas are likely to have particularly high need for advice services or particular difficulties in accessing services and it will be a priority to ensure that advice reaches these communities. We have not identified specific client groups to particular priority wards within Manchester because we want the service to be inclusive and to be able to provide assistance to all priority clients no matter where they approach the service. Although we are aware that there may be clusters of specific clients groups in some parts of Manchester, the funders want the service to be accessible at all of the access points and for clients to be treated wherever they choose to access rather than focussing on specific clients in specific areas.

The specification makes explicit reference to an expectation that providers will profile need in their locality once every 12 months. This includes consultation of the changing needs of different equalities groups.

There is a need to ensure advice provision is focused on the areas of highest deprivation. Factors such as long term limiting illness, lone parenthood, living in rented accommodation and unemployment and low income are indicators of advice need and based on this the following wards are predicted to have greatest need:

- Ancoats and Clayton, Hulme, Ardwick, Longsight, Bradford, Miles Platting and Newton Heath, Charlestown, Moss Side, Harpurhey Sharston, Higher Blackley and Woodhouse Park

In addition, the Needs analysis also clearly identified a number of key trends and priorities for Manchester. The significant areas of unmet need for legal advice appear to be:

- Employment – in particular specialist help and representation
- Community Care – all levels including casework and representation

Safeguards will be built into the tender process and contract to ensure that the successful bidder(s) are able to deliver quality services that meet local needs, while serving the whole

population. This will mitigate the risk that particular client groups might suffer a reduction in service quality as a result of the tendering of the Service.

Impact on Providers

A competitive tender, by its nature, selects some organisations to provide the service at the expense of others. Therefore, we have identified as a possible impact that some providers may lose contracts with the LSC and Manchester City Council as part of this project. This is a potential impact for any provider within Manchester.

Funding from such stakeholders may be dependant upon core funding from either the local authority and/or the LSC. As such, this project may impact upon the continued availability of ancillary funding for local providers.

The independent review of advice services in Manchester carried out consultations with all legal and advice service providers. These advice providers have participated in 2 workshops with the opportunity to raise their concerns and inform the commissioning process that has taken into account stakeholder input and views identified in the review. The joint purchasers, MCC and LSC recognise the uncertainty the commissioning may raise for advice providers and emphasises in the tender document its commitment to partnership working (section 2.10)

The following organisations are funded by Manchester City council:

Table 4. Organisations funded by MCC

Organisation
Advice and Community Resources Centre
Cheetham Hill Advice Centre
Greater Manchester Immigration Aid Unit
Manchester Citizens Advice Bureau
Miles Platting Advice Centre
Mind in Manchester
North Manchester Law Centre
One Parent Families Manchester (Gingerbread)
Pakistani Resource Centre
South Manchester Law Centre
Wythenshawe Law Centre
Women's Domestic violence Helpline

The following private solicitor firms hold contracts with the LSC to provide SWL advice in Manchester:

Table 5. Private organisations holding contracts with the LSC.

Solicitors	Areas of Law
Robert Lizar	Housing, Immigration, Mental Health
Clifford Johnston & Co	Housing, Mental Health
Platt Halpern	Housing
Otten Penna & Co Solicitors	Mental Health
Glaisyers	Community, Debt, Housing, Public Law, Welfare Benefits
Potter Rees	Welfare Benefits
Harry Boodhoo & Co	Housing
Tuckers	Welfare Benefits

Furthermore, as some of these agencies receive funding from other organisations including, Big Lottery Advice Plus Fund, United Utility Trust Fund, Goldstar (Cabinet Office), NLCDF, Surestart, Manchester Adult Education Service, we also identify that these organizations may be affected by this policy.

The tender process for the CLA Service contract will not exclude any single type of provider. The LSC will continue to welcome consortium/partnership contract bids from organisations of any size and type. It also recognises the important role that smaller community based organisations play in the delivery of community legal advice services. This policy/project may require smaller organisations to work much more closely with each other, or even merge where feasible, to deliver a wider range of services which better reflects client needs.

6. Is any aspect of the policy/project intended to:

- **Eliminate discrimination?**
- **Promote equality of opportunity?**
- **Promote good relations between different groups?**
- **Encourage participation of vulnerable people in public life?**
- **Consider more favourable treatment of disabled people?**

The CLA Services in Manchester will help promote equality of opportunity by improving access to those who face barriers to accessing advice. One of the strategic recommendations that informed the development of CLAS in Manchester states that Manchester advice strategy should ensure advice services contribute to the delivery of Manchester’s Community Strategy spines including:

- Reaching full potential in education and employment; providing access to advice can enable residents to take advantage of education and employment opportunities and maintain them.
- Individual and collective self esteem – mutual respect; enabling people to better access to advice services enables them to exercise their rights and responsibilities.
- To develop neighbourhoods of choice; enabling people to engage and participate in community living and be responsible citizens, creating more sustainable neighbourhoods.

For example, we are aware that there are a number of gaps in provision at the specialist level in terms of the categories of social welfare law currently being provided in the

Manchester area. The CLA Services will ensure that these gaps in categories are delivered. We are also aware that existing provision is concentrated in particular parts of the borough again it is the funders desire to ensure that access is increased in specific geographical locations, based on levels of deprivation and need. Therefore, as indicated earlier, the Needs Analysis identified a number of wards where levels of deprivation was high and services were lacking, and as such it was felt that outreach should be provided in those areas.

Increasing access to services also includes the need to understand what if any physical barriers may exist. These could be physical barriers e.g. ensuring the building is DDA compliant or cultural e.g. ensuring that people from all ethnic and religious groups are able to access the service, or language e.g. using translators or employing a speaker of the language.

The provider(s) is required to ensure that access to services is increased by offering a range of ways clients can be seen, this includes the provision of home visits, offering outreach at particular geographical locations and running evening and weekend surgeries.

7. Is this project due to be carried out wholly or partly by contractors? YES

It has been the responsibility of the joint working group, made up of representatives from Manchester City Council and the Legal Services Commission to establish the Services. This includes undertaking a needs analysis and EIA, drafting the specifications, consulting with stakeholders, running the tender process and awarding the contracts. Once the contracts are awarded the joint working group will become the Funding Board (although individual members may change), with overall responsibility for monitoring performance against the contract.

Providers (and potential providers) of the Services will be contractors. They will be contracted by the LSC and Manchester City Council jointly to provide the services specified to clients on behalf of the LSC and the Council. For CLA Service contracts the MCC and LSC accept bids from consortia or those that involve sub contracting. This means that although three contracts are on offer, it does not mean that there will only be three providers. This gives the opportunity for smaller or niche organisations to continue to provide publicly funded services as part of the Service. LSC and the Council must approve sub contractors as part of the tender evaluation and on-going contract management (where necessary).

If yes, have you done any work to include equality and human rights consideration into the contract already?

The Service will be delivered by an organisation under the CLA Service contracts, which includes equality provisions (the CLA Service contracts are based on the Unified Contract (Civil) standard terms and therefore contains the same equality provisions (clauses 5.1 to 5.7 and the equality and diversity annex).

The tender process to select the service provider(s) will require submission of a Pre Qualification Questionnaire incorporating equalities criteria. The selection process will include equality considerations, particularly through the assessment of whether the provider(s) meet the equalities requirements set out. The tender process will be undertaken in an impartial manner, in line with EU procurement rules, and all stages of the process will be scrutinised and approved by the MCC and LSC's Corporate Legal team

and Procurement teams .

8. Based on your initial screening, is a full Equalities impact assessment required?

This initial equality impact assessment shows that there is not a disproportionate or detrimental impact on any particular group, whether that is to clients, suppliers or any other stakeholder. However we are committed to engage with stakeholders to assess the impact further.

It is the intention of both MCC and LSC to ensure that throughout the life of the contract, an EIA review takes place at regular intervals in order to ensure that the service continues to be relevant to and not discriminate against any individual or social group.

The LSC is committed to the principles within the revised Compact in relation to funding relationships and service provision agreements between government and the third sector. Although our proposal aims to respond to the needs of the clients from specific communities of interest that may access these services, we acknowledge that it may have an impact on future funding sources for some organisations. We would welcome comments or feedback of the impact our proposal from the third sector or the Local Compact.

9. If a full Equalities impact assessment is not required, please indicate the plans to monitor the implementation of this policy over the next three years.

N/A

