

**People. Pride. Place.**

# Business Plan

Business Planning 2011-2014

Updated Business Plan for 2011-2012

*Draft Delivery Plan Component of the 2011-14 Business Plan*

## 1. Business Overview

### **Vision Statement:**

**To be acknowledged first choice provider of all legal services to Manchester City Council by maintaining our –**

**Excellent technical expertise**

**Solution focused work**

**Unique ability to provide innovative work in a local authority legal context**

**Commitment to being an integral and pro active partner in Team Manchester**

**To ensure a first class legal service for the Council wherever sourced**

### **Service Overview:**

The core business of the Legal Service is to:

- Ensure legality and probity in the Council's administration
- Provide a comprehensive legal service to the Council which includes advice, representation, documentation and negotiation
- Carry out statutory functions on behalf of the Council and
- Take a strategic role in the formulation of the Council's policies and procedures

The Service also carries out other non-core functions that include acting for third parties and external bodies, representing the Council on outside bodies and providing training and briefings to enable client departments to provide a better service.

The Service employs 168 staff of whom 55 are solicitors, 76 legal executives and para legals and 37 support staff. The support staff includes finance and research and information officers as well as administrative and word processing staff.

The structure of the Service reflects that of the Council as a whole. There are three groups

- Neighbourhood Services
- Regeneration Services
- Children's Services.

The Children's Group provides support to the Children's Services Directorate and Regeneration and Neighbourhood Services to all other Council directorates

Legal Services has legal partners to provide regeneration and child care legal work when required. Those relationships are managed through Framework arrangements.

Legal Services also provides advice and assistance to the Manchester Safeguarding Children Board, Adults Safeguarding Board the Adoption Panel and the Commercial Board.

## 2. Key Changes to be Delivered

The future development and shape of the Service will depend to a large extent on the requirements of the City Council and its departments as the Service predominantly reacts to the requirements of its clients.

In terms of change it is likely that the Council as a whole will require fewer employees, will continue its role as a community leader, will commission and enable more than provide direct services and will work more in partnerships with public and private sector organisations throughout the City.

The Council will also respond to changes introduced by the new Coalition government and this is likely to require significant input from Legal Services.

In terms of service specific changes it is anticipated that;

The Service will work more closely with legal colleagues across AGMA to ensure that legal work across GM is delivered as efficiently as possible.

The joint review of Legal Services with Salford Legal may bring significant change. The review will report in February 2011 and the Business Plan will then need to be updated.

In some areas the requirements for legal work will diminish, for example Right to Buy work, Large Scale Voluntary Transfer (LSVT) housing; in other areas it will increase, for example legal structures for partnership working, advice on key government legislative changes, advice on joint commissioning and procurement, the implementation of the Combined Authority.

It is anticipated that there will be significant legislative change brought about by the new government. The Service will need to be aware of the changes and consequences and be able to support and assist client departments in responding to change.

The Service will need to ensure that it has sufficient qualified and trained staff to respond to these changes. In particular we will need to provide specific and tailored training to staff to enable them to acquire the knowledge and skills to carry out new work. This will be included in the annual training plan.

The Service has an income target of... the majority of which is raised from providing a legal service to external housing providers. (This target will be finalised following the budget and Voluntary Early Retirement / Voluntary Severance (VER/VS) process) If those housing providers (Registered Social Landlords (RSLs) and the Arms Length Management Organisation (ALMO)) change their practices, for example by reducing the amount of legal anti social behaviour work required or working only on a fixed fee basis as their own budgets come under pressure, then the income received will diminish. Legal Services will then require fewer staff to carry out that work.

Income received is currently monitored on a monthly basis and will continue to be so. The propensity for income fluctuation has also been managed by the engagement of

temporary staff for short periods of time or for specific pieces of work. These arrangements will be reviewed in accordance with the MPeople principles.

### 3. Overall Objectives

The key strategic objectives are as set out in the Business Overview:

- To ensure legality and probity in the Council's administration
- To provide a comprehensive legal service to the Council which includes advice, representation, documentation and negotiation,
- To carry out statutory functions on behalf of the Council, and
- To take a strategic role in the formulation of the Council's policies and procedures

In addition to the above the Service work is being undertaken on a joint review of services with Salford Legal. This work will be completed in February 2011 and will impact upon the Business Plan for 2011 – 14.

The Service works with and for departments in meeting the Council's key objectives and details are set out in the self assessment. Specific examples for the next three years includes -

#### **0-5**

The Manchester Head of Service chairs the AGMA senior child care lawyers group and is the AGMA lead on initiatives designed to improve outcomes for children involved in the Court process.

The Child Care Legal Team has now expanded its advocacy service to provide more advocacy in house. This is projected to save Children's Services £80,000 per annum net in the year 2010/11 and it is anticipated that this level of savings will continue.

The Service is leading a review of Child Care Advocacy across AGMA legal services which will consider options for a Greater Manchester Child Care Advocacy Team. At present all of the County Court work is carried out at the Manchester Civil Justice Centre (CJC) and from April 2011 all Magistrates Court work will also move to the CJC. If this proposal comes to fruition it will create a Centre of Excellence in Manchester Legal Services as well as reducing spend on external barristers by all GM authorities.

We are aware of the introduction of 8 new sets of regulations in this area between December and April 2011, in addition there will be revisions to the five volumes of the Children Act Guidance. The Munro review of Child Protection is due to report in April 2011 and the Family Justice Review will produce an interim report in April 2011 and a final report in Autumn 2011. The publication of Serious Case Reviews has also brought an increase in work and involvement of Legal Services in this process.

On a broader children's front other lawyers within Legal Services will be working with officers on any proposed changes to service provision arising out of the 2011/12 budget and on the proposals set out in the Education Bill.

### **Green City**

The Regeneration (Legal) team provides legal advice and support to the City Council's Environmental Strategy team. The areas of work include the City Council's obligations under the Carbon Reduction Commitment scheme together with the development of projects aimed at meeting the City Council's ambitious targets for carbon reduction in the City. Such projects include the Manchester City Centre Heat network and initiatives in the Corridor. Additionally the regeneration (Legal) team have also supported the AGMA involvement in the establishment of the North West Evergreen Fund which is, amongst other things, exploring opportunities that may exist in the future to attract private sector investment into low-carbon projects.

Going forward we anticipate prioritising work to support the acceleration of progress towards a low carbon city such as the policy of emissions from Hackney carriages and enforcement of building control regulations in respect of conservation of fuel and power.

### **Neighbourhood Focus**

We provide a Legal Service for a range of registered social landlords and Northwards ALMO to support them in carrying out their estate management and housing functions. We have also established procedures with Northwards and several RSLs for the delivery of Building Contracts in support of the Decent Homes programme of work and other capital work they undertake. We will continue to undertake this work.

The Neighbourhood Services Group has provided legal advice and assistance in the drafting and now implementation of the new housing allocations policy to ensure the Council's community priorities were achieved in this complex area of law. The new scheme gives priority to those who contribute to the community.

The Regulatory team provides advice and assistance on licensing and gambling policies. The tri annual licensing policy review will commence shortly. Prosecutions are now being pursued under the Manchester Act in April 2010 which restricts the activity of Pedlars within the City.

The Property Review currently being undertaken by Corporate Property and service directorates will lead to an increase in legal work on surplus land disposals and enforced sales.

The focus on a more streamlined Strategic Development Function within the Council will require legal support on specified projects, and there will be ongoing legal services involvement to the Evergreen project by the Head of Regeneration (Legal).

### **Worklessness and Skills**

Members of Legal Services are working closely with colleagues across the Council to implement the MPeople proposals. It is anticipated that this work will continue throughout 2011 and will include employment and staffing issues arising out of the implementation of departmental Target Operating Models (TOMS).

Staff have been informed of the MPeople process and skills pledge. It is intended that staff will be encouraged to take up the Council's offer of a skills pledge to ensure that all staff have the minimum qualifications. The skills audit will then be extended to all staff to ensure that staff have, or can acquire the necessary skills to meet the future legal requirements of the Council.

Year on year we have expanded our in house training service and will continue to do so. We have also supported four Future Jobs Fund people in the past 12 months and will continue to do so. One future jobs fund candidate was able to secure a full time job following his placement in legal services.

On a broader front the Government has stated that it intends to give public sector workers a new right to form employee owned co-operatives and bid to take over services that they deliver. Any such developments will require legal advice and assistance to ensure that they are lawful and to protect the position of the Council.

### **National Issues (December 10)**

#### **Education Bill (January 2011)**

It is clear that the Coalition intends to radically alter the responsibility for the provision of schooling and the role of the local authority with the extension of Academies and Free Schools. The Education Bill is also proposing changes to legislation on admissions and behaviour, governance structures and school funding amongst other measures.

A Green Paper is also due to be published on changes in the statutory framework for children Special Education Needs.

#### **Localism**

It is likely that the Government's localism agenda will involve significant legislative change in the field of local government law. The Decentralism and Localism Bill has just been issued (having been delayed some weeks). The details of the Bill will need to be considered and advised upon.

It has been indicated that there will be proposed radical changes to the planning system, changes in the legal basis of the public rented sector, changes to the Regulation of Investigatory Powers Act (RIPA) powers, the abolition of the Standards Board regime, changes in local authority communications to reduce competition to local newspapers, powers for local communities to run local services, and the introduction of a general power of competence for local authorities.

The Bill will provide new housing allocation rules which will determine who can qualify to go on a Local Authorities waiting list. Transferring tenants who are not in housing need will be removed from the allocation rules. The bill will allow local authorities to grant tenancies for a fixed period of time (in addition to lifetime tenancies) and there will be changes to the manner in which the Local Authorities homelessness duties can be brought to an end.

## **Health**

The Health White Paper, Healthy Lives, Health People, states that the intention of the Secretary of State is to give the responsibility to make a major impact on improving people's health and tackling health inequalities to local government, building on the existing public health role. This will include the introduction of local statutory health and well being boards.

## **Adults Social Care**

The Law Commission review of Adult Social Care law has been brought forward to ensure that it publishes its findings and recommendations early next year (2011) to fit with the Government's proposals for reform in this area. It is anticipated that the Law Commission will propose an updating and consolidation of legislation in this area that will radically change the current legal framework.

## **Objectives**

It will be the objective of the Service to continue to provide an operational and responsive legal service to clients in this changing environment. Staff will need to be aware of and understand the changes being introduced, the impact upon the local authority and the impact upon service provision.

## **Communication**

In terms of being up to date with changes the Service has a Senior Information Officer who publishes (through the Intranet) a fortnightly legal update. This is a resume of articles, cases, legislation and guidance that can then be accessed through links provided.

Staff also have access to daily alerts through Lawtel, info4local and other specialist sites. In addition many staff attend Special Interest Groups where lawyers in the same discipline from across North West public sector organisations discuss legal developments and issues.

## **Training**

Legal Services will need to be particularly aware of these issues when carrying out appraisals and planning for training from 2011. We are planning to hold a Housing Conference in April 2011 and working with colleagues in the Organisational Improvement and Service Inclusion Team to provide training on equalities issues in 2011.

## **January 2011 update**

It is likely that the budget proposals to be considered by the Council will require legal advice and assistance to all Departments as they are progressed.

## 4. Performance Measures

Objective	Performance Measure	Baseline (date)	Target Performance			Actual Performance
			2011/12	2012/13	2013/14	(2010/11)
<i>To implement recommendations from review of Service with Salford Legal Services</i>	<i>Final recommendations implemented</i>	April 2011				New target
<i>Upgrade or replace electronic case management system</i>	<i>System operational and delivering benefits</i>	April 2010	Options assessed and procured	System implemented	System embedded	Not assessed or procured
<i>Implement electronic bundling and document management</i>	<i>System operational and delivering benefits</i>	April 2010	System implemented	System embedded		Options assessed and procured
<i>Increase in house Advocacy</i>	<i>Reduction in use of barristers</i>	April 2010	Reduction in cost of external legal spend			Costs reduced
<i>Regional work and work with AGMA</i>	<i>Provision of service to AGMA partners</i>	April 2010	Evidence of joint working and benefits			A number of projects completed

## 5. Workforce Plan

We have embedded the Council's values through briefing staff in September on the refreshed values and discussing how as employees of the Council we demonstrate these values in our working life. Staff provided valuable feedback on how as a service we demonstrate the values and also provided ideas on what more we as a service could do.

Staff feedback on how we embody the values -

- Projecting a good image of the council - external organisations are very positive about MCC - we are very professional
- Seeing the results of our work - Sportscity, Spinningfields, Building Schools for the Future, work with Housing Associations, Gating Schemes and Metrolink and all regeneration work undertaken
- Improving communities by removing trespassers
  - Helping vulnerable people - mental health
  - Getting rid of housing not suitable for modern living
  - We adhere to values without realising - it is ingrained in what we do
  - Take pride in outcomes - motivated to succeed and get the best result
  - Compulsory purchase to develop the city, anti-social behaviour in the city and outskirts - all these make the city a better place
  - Pride in achieving Lexcel standard

### **Staff feedback when asked what more could we do?**

- Problem solving page on the intranet
- More flexible attitude to new ways of working
- Feedback from client departments to see how we can assist them and achieve their objectives and how to improve in areas
- Look at the way we work and how we can improve
- Publicise the work we do
- More training focusing on client needs
- Be sensitive/understand client position e.g. their own potential funding difficulties
- Assist staff to see bigger picture and their part in it
- Be more careful in what you need to print out (emails) - try to reduce the costs.

We have taken these ideas forward and developed them. We will ensure that the training that we deliver to our Clients is focused on their needs, for example future training includes a housing conference which will take place on the 6<sup>th</sup> April and our continuing work with Children's' services to provide training to staff. We will continue to review how we embed the values in our service.

### Management Standards

We have adopted a strong performance management framework. Randomly selected files are checked on a regular basis and staff appraisals are carried out annually with a six month review. The Workforce Development Group drafts a training plan for the Legal Management team's consideration following an evaluation of the training and development plans drawn up at appraisal meetings. The Legal Service office manual has a people management section which provides guidance to managers and staff (this is alongside the corporate guidance) to ensure that a wide range of developmental options are considered during the appraisal process including shadowing, coaching and jointly working on projects to enhance the individual members staff development. We have employed a mentoring system for new managers where new managers are mentored by a Legal Services manager outside their group to provide informal support with the performance management framework.

We have continued to provide training and development for our staff through internal and external training, professional legal study leading to qualifications and involvement in the Solicitors' Regulatory Authority work based learning pilot which has, in the last 12 months, enabled 4 staff members to qualify as solicitors whilst in employment with MCC.

We encourage a flexible approach to working subject to the needs of the service which also supports staff development.

The Workforce Development Group have introduced a work placement policy which has clear aims and an application criteria for placements for pupils from Manchester schools. We wished to ensure that as a Division we were clear about the type of candidate to whom we could provide a work placement to. We refocused to provide a quality work placement experience for the student and this has helped the Division to come in to contact with students who may be interested in undertaking a career in Local Government in future.

We have worked hard to ensure that the training we provide is tailored to meet the identified training needs and developmental plans arising from Staff appraisals. In order to ensure that the training provides VFM we collate feedback from all in house sessions. We have recently contracted with the College of Law in Manchester to receive a package of training which will allow Staff to receive high quality training at low cost that they can view via DVD. This will ensure that travel costs for undertaking

training are kept to a minimum. This package will also allow groups of staff to participate in group discussion sessions following the training. This training is available to all legal services staff.

We have strengthened our links with the Manchester Metropolitan University. We participated in a scheme to allow 4 Legal Practice Course students to undertake work placements at our offices. The work placement forms a part of the Student's LPC, each student has to provide a synopsis of learning points gained from the placement. We are working with MMU to further develop this scheme next year and have agreed to accept 4 students and offer them each a week's placement which will allow the student to see a housing case hearing from start to finish.

### Workforce profile

Organizational Unit	GRADE BAND	<18	18 - 24	25 - 34	35 - 44	45 - 54	55 - 59	60+
Legal Services	Grade 1 - 5 (and equiv)		3	13	4	6	4	2
	Grade 6 - 8 (and equiv)		1	8	21	16	6	1
	Grade 9 - 10 (and equiv)			10	22	8	7	1
	Above Grade 10				5	6	1	
<b>Legal Services Total</b>			<b>4</b>	<b>31</b>	<b>52</b>	<b>36</b>	<b>18</b>	<b>4</b>

### Equality Monitoring Report - Sept 10

Service Area	Grade Band	Number of Employees	Number With EO Data	Number of BME Employees	% BME	Number of Female Employees	% Female	Number With Disability Data	Number of Disabled Employees	% Disabled
Legal Services	Grade 1 - 5 (and equiv)	32	29	2	6.90%	20	62.50%	29	1	3.45%
	Grade 6 - 8 (and equiv)	53	52	6	11.54%	37	69.81%	52	2	3.85%
	Grade 9 - 10 (and equiv)	48	43	7	16.28%	30	62.50%	43		0.00%
	Above Grade 10	12	12		0.00%	6	50.00%	12		0.00%
<b>Legal Services Total</b>		<b>145</b>	<b>136</b>	<b>15</b>	<b>11.03%</b>	<b>93</b>	<b>64.14%</b>	<b>136</b>	<b>3</b>	<b>2.21%</b>

## 6. Equalities Action Plan

Note – the action plan should include relevant information on the six equality strands, race, gender, disability, sexuality, age and religion and belief

Strategic objective 1- Knowing your communities and equality mapping				
Target	Activities	Officer responsible	Deliver by	Outcome
To ensure that all staff are aware of the implications of the Equality Act when enacted	Training organised through internal Workforce Development Group	Jacqui Dennis as Chair of WDG	May 2011	All staff aware of the legal implications of the Act and how it is relevant to their work
To work with clients on the implications of the Equality Act	To work with Corporate Performance to ensure that staff are aware of the implications of the Equality Act. Legal Services will continue to work with corporate performance to ensure that equalities issues are addressed when new policies including the provision of advice on equality impact assessments. .	Liz Treacy	Ongoing	All departments are aware of their legal obligations under the Equality Act.

Strategic objective 2 – Place shaping, leadership, partnership and organisational commitment				
Target	Activities	Officer responsible	Deliver by	Outcome
To arrange Equality Act training that is accessible to our partners such as RSLs	Training organised through WDG and if appropriate with support of Corporate Performance	Jacqui Dennis	April 2011	Housing Law conference taken place which will provide training for partnership

<b>Strategic objective 2 – Place shaping, leadership, partnership and organisational commitment</b>				
<b>Target</b>	<b>Activities</b>	<b>Officer responsible</b>	<b>Deliver by</b>	<b>Outcome</b>
and ALMO				organisations on the implications of the Equality Act in the provision of services to the community.
To monitor and report on cases where equalities issues are relevant to issue or outcome	To monitor ASBO/Injunction cases issued where any form of discrimination form part of evidence  To monitor Employment Tribunal Cases issued against the Council where grounds include any form of discrimination	Stephen Tonge  Gareth James	Ongoing from April 2010	Information provided to Corporate Performance and Corporate Personnel  Action taken by departments where relevant e.g. to reduce Tribunals
To raise the legal requirement for Equality Impact Assessments where relevant to Council policies or practices	To work with Corporate Performance in raising the profile and requirements for Equality Impact Assessment	Legal Management Team (LMT)	Ongoing from April 2010	Increase in number of EIAs throughout the Council
To embed equality into our commissioning and procurement processes	Legal Service framework for preferred providers will be renewed in April 2011.	LMT	September 2011	Procurement process completed – equality issues considered as an integral part of the commissioning process
Ensure partner organisations understand the importance of	Legal Services currently offer work placements in partnership with the Manchester	Jacqui Dennis Head of Workforce Development Group	June 2011	Joined up policy with Manchester Metropolitan University

<b>Strategic objective 2 – Place shaping, leadership, partnership and organisational commitment</b>				
<b>Target</b>	<b>Activities</b>	<b>Officer responsible</b>	<b>Deliver by</b>	<b>Outcome</b>
equalities and embed them in their processes	Metropolitan University. Annually 4 Manchester students attend a work placement with the Neighbourhood Services Group. We will ensure that the selection process accords with equality legislation and that the placement scheme allows students who reflect our community the ability to access these placements.			which fully addresses equality issues.

<b>Strategic objective 3 – Community engagement and satisfaction</b>				
<b>Target</b>	<b>Activities</b>	<b>Officer responsible</b>	<b>Deliver by</b>	<b>Outcome</b>
Legal Services are a support services however we work closely with our instructing departments to ensure that equality issues are fully considered.				

<b>Strategic objective 4 – Responsive services and customer care</b>				
<b>Target</b>	<b>Activities</b>	<b>Officer responsible</b>	<b>Deliver by</b>	<b>Outcome</b>
To respond to requests from clients on equalities legislation and obligations and	Training on new legislation Advice given when requested Advice provided when required	LMT	As and when required	All staff and clients aware of legal duties in this area thereby limiting breaches of legal obligations
To support and advise the Corporate Centre on the Council's legal obligations on equalities issues	As above	LMT		Increased awareness of equality duties throughout the Council
Our service is accessible to all.	The service can communicate with its users in a variety of ways including email, telephone. Our meeting rooms are accessible. We will attend meetings on request of the service user.	LMT	On going	We will regularly review accessibility to our service.  We will monitor Client's views on accessibility to our service in our 2011 customer survey.

<b>Strategic objective 5 – Modern and diverse workforce</b>				
<b>Target</b>	<b>Activities</b>	<b>Officer responsible</b>	<b>Deliver by</b>	<b>Outcome</b>
Ensure that training and development plans address equality objectives	LMT currently receive a 6 monthly report on training and development plans following the completion of annual and 6	Jacqui Dennis as Head of Workforce Development Group	On going	LMT currently– incorporate a report on equality

	monthly appraisal review. The report will now address equality objectives to ensure that they are embedded in our training plans.			
Equality impact assess our workforce development policies to ensure that each equality strand (disability ,age,race,gender, religion and belief) is addressed	Current workforce development polices currently include  - Work placement policy		April 2011	EIA completed and reported to LMT

## 7. Risk Register

Risk Identification and Consequence Summary									
Ref	Date Opened	Date Closed	Risk Description	Existing Controls	C	L	Risk Rating	Additional Controls / Notes	Lead for mitigating plan
1	April 2010		Continued reduction in Land charges income	Consideration through budget review process	3	5	High	Ongoing discussions with City Treasurers	LT
2	April 2010		Inability to plan for effective service because of reactive and urgent nature of work	Regular meetings with client departments and heads of groups to discuss priorities, risks and workloads	2	3	medium	Review of work through Risk Registers and Supervisions	LMT
3	April 2010		Impact of economic downturn	Regular monitoring of workloads and income targets	2	3	Medium	Monthly reports to LMT	LMT
4	April 2010		Reduction in third party income	Client liason meetings supported by lexcel accredited quality assurance measures to retain existing client base. Strategy to identify and pursue new opportunities when arise	4	2	medium	Monthly reports to LMT	LMT
5	April 2010		Loss of current funding streams (e.g. HMR)	Work with client departments to explore options for	4	4	High	Review of Central Recharges	DG

Risk Identification and Consequence Summary									
Ref	Date Opened	Date Closed	Risk Description	Existing Controls	C	L	Risk Rating	Additional Controls / Notes	Lead for mitigating plan
				continuing work through mainstream funding and to understand impact on wider City Council activity					
6	April 2010		Staff not sufficiently skilled or knowledgeable to respond to clients' requirements	Work with client departments to identify changes in legal service required. Identify new skills and knowledge required and provide training	4	1	Low		LMT

## 8. Business Continuity

### Management Progress Statement

#### Progress Statement

**Business Continuity colleagues have met with the Legal Management Team and then followed up with 2 meetings with staff to discuss business continuity in their areas. There was no follow up required from those meetings. Business Continuity is considered as part of the Service's Lexcel Accreditation and was commended in the 2010 assessment by the independent assessors.**

Thematic Area	Risk Being Addressed	Development Objective	Agreed Actions	Target Date
Service Continuity Planning				
Incident Management				
ICT Resilience				
People Resilience				
Premises/Facilities Resilience				
Third Party Resilience (Supply Chain, Contractors, Partners)				
Exercising and Maintaining				
Awareness/Embedding Activity				

## 9. Communications

Planned key strategic communications activity for 2011/12	Key Timings	Target Audience	How will you measure success?	Which Partners will be involved (if appropriate)?
	<i>Quarterly</i>	<i>All staff</i>		
<i>1. Regular team meetings with standard agenda</i>	<i>4/6 weeks</i>	<i>All staff</i>	<i>Staff feedback</i>	
<i>2. Quarterly whole service staff briefings that always include interactive sessions led by managers</i>	<i>Quarterly</i>	<i>All staff</i>	<i>Staff feedback</i>	
<i>3. Communication with clients on legislative changes</i>	<i>As necessary</i>	<i>Users of the service</i>	<i>Client survey</i>	
<i>4. As we are not a front line service we do not communicate directly with residents</i>				