

BY EMAIL
26 July 2017

Electoral Review of Manchester City Council:

Response to Complaint by

Platt Claremont Residents' Association
Rusholme & Fallowfield Civic Society
Friends of Whitworth Park
Rusholme Community Traders Association
Cranswick Square Residents Association
Moss Side Community Allotments
Upping It! In Rusholme
Moss Side Roberts Avenue & Playfair St Residents Association

I am writing in response to your complaint, dated 26 June 2017, relating to the review of Manchester City Council in which you contend that the Commission failed to meet the requirements of the Local Democracy, Economic Development and Construction Act 2009, (Section 58, Review Procedure) in Manchester and, specifically, in Moss Side and Rusholme. The Commission has a 3-stage complaints procedure. This response is intended to cover stages 1 and 2 of our procedure, being the officer response. If you are unhappy with this response, you may ask for a stage 3 review which would be undertaken by a commissioner who was not at the July 2017 Commission meeting.

I apologise for the delay in this response but, as previously explained, the Commission meets once a month and, given the serious nature of your complaint, it was important that the Commission considered, in detail, the points you raised, informed by all appropriate information. Accordingly, the complaint was considered by the Commission at its meeting on 18 July 2017.

On 19 July, we wrote to inform you that the Commission had decided to lay the draft order in Parliament and promised to explain the reasons for that decision within one week. Accordingly, I now write with the reasoning behind that decision and, in so doing, present our response to your complaint. This letter provides a general response and the details are contained in appendix A, which sets out the details of the consultation process, and appendix B, which responds to the detail of your complaint. Appendix C is the paper that was considered by the Commission at its 18 July meeting.

Having reflected on the matter very carefully - including considering the various issues raised in your complaint, reviewing the actions taken by LGBCE to publicise the Manchester electoral review, and requesting further information from the City

Council about how it had itself assisted in publishing the review - the Commission believes that it has met its statutory requirements as laid out in the Local Democracy, Economic Development and Construction Act 2009, Section 58: Review Procedure. The Act requires the Commission to:

- (a) prepare and publish draft recommendations
- (b) take such steps as its considers sufficient to secure that persons who may be interested in the recommendations are informed of them and of the period within which representations with respect to them may be made, and
- (c) take into consideration any representations made to the Local Government Boundary Commission for England within that period.

It is the Commission's view that these obligations were fulfilled and, also, that it has adhered to its own procedures as set out *Electoral Reviews: Technical Guidance (April 2014)*.

Although containing a variety of elements, the essence of your complaint is that, as residents, you were unaware that the review was taking place and, thus, were denied the opportunity to contribute to that review. If this is the case then we can only apologise. However, the Commission does not believe that this reflects any deficiencies in its own processes and believes that it took sufficient steps to ensure that the public were informed of the Manchester review.

Annex A lists the consultation measures taken during the review, as well as actions performed at our request and on our behalf by Manchester City Council. Together, these included:

- Issuing press releases at each stage of the review
- Informing all the city's MPs about the review and offering briefing meetings with them
- Briefing the full Council and appropriate officers (20 January 2016).
- Issuing 100 posters (These were made available to the 22 municipal libraries across the city, including four – Fallowfield, Moss Side Powerhouse, Levenshulme and Longsight - that are within or adjacent to the areas covering the two wards from which the complaint has arisen)
- Informing the public of the review via an e-mail list provided by the Council covering a range of organisations, associations and community interest groups which the Commission could reasonably have expected to be informed of the review and, in turn, through which they could make others aware through cascading the information
- Reaching approximately 80,000 Facebook users in the Manchester area
- Instigating four Twitter posts (retweeted by the Council to their list of (approx. 130,000 followers)
- Including information about the review on the Manchester Council website and consultation area.

We also note that the matter was discussed at four full council meetings (20 January 2016, 18 May 2016, 21 September 2016, 25 January 2017). On each occasion, the

review was discussed in public and webcast, and appropriate public documentation was made available.

Whilst the Commission acknowledges that, despite these efforts, the response levels during the review were low, we are unable to guarantee the level of public participation.

In short, the review process followed an established process, attempted to distribute information about it widely, and encouraged feedback at each stage of the review, all of which subsequently informed our recommendations. We do not believe that any particular area or community was at a disadvantage in participating in the review. Whilst we regret that in your view that you were not informed, we do not accept that this was due to any deficiency in our process and believe that we took reasonable steps to publicise the review.

Finally, I address your request that the order should not be laid until all stages of the complaints process, together with any potential referral to the Parliamentary Ombudsman, are exhausted. The Commission considered this request carefully and as you know it has now laid the order.

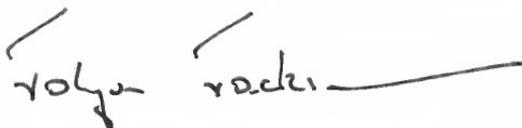
Laying of the order at this point does not preclude the further steps available to you and the order itself will be subject to the formal parliamentary processes, so we do not believe that this action disadvantages you.

I recognise that this response might not lessen your disappointment with the outcome of the review in respect of the two localities, but I hope that it will help reassure you about the integrity and independence of the process. In undertaking the review, we believe that we fulfilled all of our duties, specifically in respect of informing the public about the review, encouraging their participation, and taking into account all representations received within published deadlines into account in drafting our recommendations.

The Commission continuously strives to improve its processes and procedures. In light of the matters you have raised, we will look at further possible improvements to the way we conduct reviews.

If you wish to pursue your complaint further, please indicate so and it will be dealt with under Stage Three of the Commission's complaints procedure.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jolyon Jackson', with a long horizontal line extending to the right.

Jolyon Jackson CBE
Chief Executive
Jolyon.jackson@lgbce.org.uk
0330 500 1290

Appendix A – details of consultation

The Commission has responsibility to take steps, as it considers sufficient, to ensure that people who may be interested in the review are informed of it and of recommendations that emerge from the process. The Commission took several steps to meet its responsibilities:

- Briefed the full council, and appropriate council officers, about the review process and, subsequently provided Manchester-specific materials for distribution both by ourselves and by others.
- Wrote to the Council's Chief Executive at the start of the initial consultation phase on warding patterns and, again, when commencing consultation on draft recommendations, to inform them of the process and with a specific request that they publicise each consultation stage alongside the publicity channels used directly by LGBCE itself.
- Wrote to all Manchester MPs at each stage of consultation to inform them of the process and of the recommendations.
- Emailed, or wrote to, approximately 140 community organisations from a list supplied to the Commission by the Council. The correspondence, sent at the start of both phases of consultation, included information on the review and the recommendations as well as encouragement for the groups to participate.
- Produced 100 posters about both the initial consultation warding pattern and for the consultation on draft recommendations. The Council inform us that these were made available to 22 libraries across the city, including Fallowfield, Moss Side, Powerhouse, Levenshulme and Longsight libraries in, or adjacent to, the two wards concerned.
- Issued press releases to local media during the course of the review, including the two phases of consultation. The Commission used media targeting software to produce a list of local outlets and contacts. The Commission cannot guarantee that these press releases are published.
- Made use of social media to go beyond 'niche channels'. At each stage of consultation, the Commission promoted its Facebook posts to increase awareness of the consultation. During the first phase of consultation, 45,119 people in the Manchester area saw the LGBCE post, with 4,876 engaging with it by clicking on the attached picture, clicking the link to the Commission's online consultation portal or sharing it.

- During consultation on draft recommendations, 35,417 people were reached with the relevant post with 2,677 users clicking on the link to the consultation portal and a further 71 users engaging with the post in another way.
- On Twitter, four of the Commission's tweets were retweeted by Manchester City Council to their followers. The tweets in question were posted on 26 July 2016 and 19 September 2016 - during the initial consultation on warding patterns. For the consultation on draft recommendations, the Commission's promotional tweets were retweeted on 29 November 2016 and 13 January 2017. As of today, we note that the City Council's Twitter feed is followed by c.130,000 people who are interested in its activities and announcements.
- Manchester City Council, in accordance with our requests, included a link to details of the review on the consultation page of its website. They also inform us that 400 visitors made use of the link.
- Manchester City Council also inform us that the review was debated on four occasions in public meetings of the full council and was described in the Leader's blog on their website. We note that ward councillors for the areas concerned with the complaint were present on each of these occasions.

Whilst you say that, despite these various communication channels, residents in the two wards were unaware of the review, we know that the Rusholme and Fallowfield Civic Society website (one of the signatories to the complaint) contains a link directly to the Council's consultation website. The latter detailed both the electoral review and response opportunities.

Appendix B - Responses to the Detailed Evidence Supporting the Complaint

It might be helpful now to address the specific issues raised in the complaint.

1. Adherence to the Local Democracy, Economic Development and Construction Act 2009, Section 58, Review Procedure.

Complaint: In the case of the recent electoral review of Manchester City Council, we have gathered evidence* that shows that either no steps, or insufficient steps, were taken “to secure that persons who may be interested in the review were informed of –
(a) the fact that the review is to take place, and
(b) any particular matters to which the review is to relate.”

In the case of the recent electoral review of Manchester City Council, we have gathered evidence* that shows that either no steps, or insufficient steps, were taken “to secure that persons who may be interested in the recommendations are informed of them and of the period within which representations with respect to them may be made”.

As noted above, the Commission considers that the consultation process was reasonable and sufficient. Details of the measures taken are described more fully In Appendix A. The process followed well-established practice and extensive efforts were made to publicise the review at each of its four stages. The timetable for inviting comments was also made clear and all representations received within that prescribed schedule were considered carefully and informed the Commission’s draft and final recommendations.

2. Adherence to the LGBCE Electoral Reviews Technical Guidance. April 2014

The Commission is content that the decisions taken by LGBCE officers were based on the evidence they received and a proper analysis of that evidence, including that offered by individuals and community groups.

**1. Either no steps, or insufficient steps, were taken “to secure that persons who may be interested in the review were informed of –
(a) the fact that the review is to take place, and
(b) any particular matters to which the review is to relate.”**

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

2. Either no steps, or insufficient steps, were taken “to secure that persons who may be interested in the recommendations are informed of them and of the period within which representations with respect to them may be made”.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website. The process included the deadline for representations to be made.

3. The decisions taken by officers of the LGBCE were not based on evidence and reason.

The approach taken by LGBCE officers was not one of evidence-gathering through consultation with local people and organisations.

The analysis by LGBCE officers did not include evidence received from local people and organisations.

Local people and organisations were not able to have their say to the LGBCE officers, consequently, nor were local people able to provide supporting evidence.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

The analysis by LGBCE officers included thorough consideration of all the evidence received, including evidence from local organisations and residents.

4. LGBCE officers did not balance their consideration of electoral quality with “the need to reflect local community identities and interests”.

LGBCE officers did balance their consideration of electoral equality with the evidence of community identity that was submitted to the Commission.

5. LGBCE officers did not “consider community identities and interests”.

LGBCE officers considered community identities and interests with the evidence they received throughout the review process, including on a visit to Manchester and when drawing up the draft and final recommendations.

6. LGBCE officers did not “ensure that our recommendations are based on evidence”; nor did they ensure that “reviews will be conducted with transparency and the involvement of local people”.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website. The draft and final recommendations were based on the evidence received.

7. LGBCE officers did not:

“Provide opportunities for local people and organisations to contribute to reviews;

...ensure that we have sufficient information as to enable us to reach decisions on our recommendations;

...talk to...other key partners in the area...;
...give clear...effective support*** to local authority members and officers regarding the information we require in order to undertake an effective review.”**

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

8. LGBCE’s officers’ approach was not one of consultation, reliance on evidence, openness, transparency and proportionality;

LGBCE’s officers’ aim to “build as many of our recommendations as possible on locally generated proposals” was not met

**LGBCE’s officers did not “gather as much information and undertake consultation as is appropriate to the purposes and the context of any review”
LGBCE’s officers did not “ask that the...community groups, residents’ associations and other main stakeholders help us engage with local people in the electoral review process”.**

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

The draft and final recommendations were based on the scheme provided by the Council, with some modifications to reflect submissions from other local stakeholders. The recommendations were, therefore, built on locally generated proposals.

9. LGBCE’s officers did not have regard to “the need to reflect the identities and interests of local communities”.

LGBCE’s officers did have regard to “the need to reflect the identities and interests of local communities” with the information they had available. Whilst you may feel that you were unable to present evidence, the Commission did make sure of the evidence it received.

10. LGBCE’s officers have fixed boundaries that “break local ties” and have not taken into account the “physical features of the local area when drawing boundaries”.

LGBCE officers have drawn boundaries with the locally generated evidence they received. They also took into account the physical features of the local area, as observable both from studying maps and from visiting the city.

11. LGBCE’s officers have not followed the legislative rules on how the LGBCE should undertake reviews, specifically that LBGCE officers “must take steps to inform people who we think might be interested in the review”.

The Commission considers that it has carried out its statutory duties.

12. LGBCE’s officers completed the review without “giving people an opportunity to comment on them...”.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

Only one period of consultation is required by statute; the Commission provided two opportunities for people to comment.

13. LGBCE’s officers did not “gain a clear understanding of the extent and nature of communities and the linkages between them”.

The Commission is content that the decisions taken by LGBCE officers were based on the evidence they received and a proper analysis of that evidence, including that offered by individuals and community groups.

14. LGBCE officers failed to notice the almost complete lack of evidence relating to community identities and interests coming from those most likely to have most knowledge about community identities and issues.

LGBCE officers failed to conclude that this was at odds with the LGBCE’s approach described in section 2.17, i.e., “...one of consultation, reliance on evidence, openness, transparency and proportionality. We aim to build as many of our recommendations as possible on locally generated proposals and, to that end, we will gather as much information and undertake consultation as is appropriate to the purposes and the context of any review. We will publicise the review and we ask that the local authorities, political parties, parish and town councils, community groups, residents’ associations and other main stakeholders help us engage with local people in the electoral review process.”

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

LGBCE officers did notice the response levels during the review were low. However, very different levels of response are received to each review and a low response level does not necessarily indicate a problem.

15. LGBCE officers failed to notice the almost complete lack of evidence from community representative organisations, area forums and similar mechanisms.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

LGBCE officers did notice the response levels during the review were low. However, very different levels of response are received to each review and a low response level does not necessarily indicate a problem. As we have indicated, we cannot guarantee that community representative groups etc will respond.

16. LGBCE officers failed to notice the almost complete lack of evidence centred on local schools, health facilities, religious facilities, recreational or shopping facilities.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

Several submissions provided evidence centred on local schools, health facilities, religious facilities, recreational or shopping facilities. The submission from MCC, for example, makes numerous references to schools, churches, mosques, parks and shops.

17. LGBCE’s officers did not “encourage...the public at large to tell us what they would like to see in the electoral arrangements for their local authorities.”, or “arrange consultations on our draft recommendations”.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

18. LGBCE officers failed to notice the almost complete lack of evidence centred on parks and recreation grounds or shopping facilities.

Having again reviewed the measures undertaken, the Commission remains of the view that the consultation process was reasonable and sufficient. As noted above, the details of the process are shown in Appendix A and all of the representations made as part of the review are available on the LGBCE website.

Several submissions provided evidence centred on parks and shopping facilities. The submission from MCC, for example, makes numerous references to parks and shops, and the submission from the Community on Solid Ground group provided evidence relating to Manley Park.

19. LGBCE officers failed to notice that Manchester City Council failed to provide a comprehensive mailing list of community groups, partners and usual stakeholders and details of neighbourhood/community governance arrangements, or, failed to publish it on the LGBCE website.

LGBCE officers consider that local authorities in each area are likely to have the most comprehensive list of organisations and it is reasonable for the Commission to rely on this. MCC did provide a comprehensive mailing list and everyone on the list was contacted. The Commission could consider it could have reasonably expected those contacted to have cascaded the information to community groups.

3. Adherence to a report commissioned by the LGBCEs' predecessor body The Boundary Committee for the Electoral Commission: *Community Identity*.

This report was commissioned in 2005 and material within it informed the construction of the *LGBCE Electoral Reviews: Technical Guidance* (April 2014).

The document itself does not constitute a definitive and formal framework about how the Commission incorporates the concept of 'community identity' (one of three statutory considerations that are accorded equal weight in our reviews) but rather helped inform our technical guidance which, in turn, is intended to assist those making representations to understand, and present, arguments about how community identity might shape ward boundaries. Ultimately, however, the Commission has to exercise its judgement in drawing boundaries such that they reflect the three statutory criteria given to Commission (electoral variance, community identity and effective and convenient government) and do so in a way that balances such considerations across the whole council area. Inevitably, it is rare that a single 'solution' will be agreed by all local participants and, in such cases, the Commission is required to exercise its own judgment based on the available submitted evidence, all of which is publicly available.

1. Failure of the LGBCE to meet its own remit, guidelines and procedures

The Commission considers that the consultation process was reasonable and sufficient and the details of the process are shown at Appendix A.

1.1 Failure of LGBCE to notify relevant community organisations in Rusholme and Moss Side.

The Commission examined the list provided by MCC and considered that the distribution covered umbrella organisations for a large number of residents' associations and community groups and we could reasonably have expected they would have been informed.

1.2 Failure to announce the Electoral Review on Manchester City Council's E-Bulletin

This is an issue for Manchester City Council

1.3 Failure to announce the Electoral Review on MCC's Twitter account

Please see Appendix A for details of twitter communication.

1.4 Failure of LGBCE to offer publicity for Manchester beyond 'niche channels'

Please see Appendix A.

1.5 Failure to ensure posters into key locations in Rusholme and Moss Side

100 copies of the posters were issued to MCC who are then responsible for their display and inform us that posters were displayed in 22 libraries across the city, including Moss Side Powerhouse library and three adjacent libraries listed above. We do not, ourselves, have the authority to ensure that posters are displayed at these or other locations.

1.6 Failure of LGBCE to check on MCC actions, or implement alternative arrangements.

The Commission requests that councils participate actively in our reviews and take reasonable steps to publicise reviews and engage the general public. In this instance, we believe that reasonable actions were taken.

2. Failure of the LGBCE to ensure independent scrutiny in Manchester

2.1 Potential for conflicts of interest

2.2 Why the Manchester ward boundaries matter

The Commission considers that the consultation process was reasonable and sufficient and the details of the process are at Appendix A.

3. Failure of the LGBCE to act on the lack of submissions across Manchester, including from Moss Side and Rusholme

3.1 The First Consultation: Consultation on Warding Arrangements:

The Commission can never anticipate how much interest a review will generate, both in general and in specific localities. The initial consultation drew responses from three political parties, six local organisations including a Neighbourhood forum and a Residents' Group and seven local residents. Further, proactive actions by the Commission to solicit representations from particular areas and/or groups could be viewed as prejudicial and to disadvantage other areas, leading to challenges of interference and lack of impartiality by the Commission.

3.2 The 2nd consultation: Consultation on draft recommendations

The Commission can never anticipate how much interest a review will generate.

4. Failure of the LGBCE to act on, consult on, or reverse, the observable breaches of boundary guidelines, or the asset-stripping of Moss Side ward (covering 4.1 to 4.5)

The LGBCE draws up electoral wards so that councillors can be elected to their local authority. It decides these on the basis of their three statutory criteria. After the review is completed, the local authority may have to change some of its management arrangements as a result of the review. For example, when we occasionally ward a parish and place it in two different electoral wards the authority will sometimes have a community governance review to amend the parish boundary.

The Commission considers that the consultation process was carried out properly and was reasonable and sufficient and the details of the process are at Appendix A. All representations presented within the prescribed timescale were taken into account in the formulation of recommendations.

5. Failure of LGBCE to act when community organisations reported the failure of notification and the problematic proposals.

This issue was discussed by officers within the Commission, but was not presented to the full Commission as the final recommendations had already been agreed by Commission at that point. To have re-opened the process at that point could have been challenged by those who had made submissions within the prescribed timescale and compromised the integrity of the process. However, in order not to prejudice the matter, the laying the order was delayed until the Commission had made a subsequent decision at its meeting on 18th July. The paper that was considered by the Commission is at Appendix C supported by the evidence at Appendix A.

Appendix C – paper considered by the Commission at its July meeting

Report to:	Commissioners
Subject	Electoral review of Manchester – response to complaint
From	Lucy Dunkeyson – Review Manager
Commissioner	Sir Tony Redmond
Appendices	A: Complaint from eight community groups in Rusholme and Moss Side B: Complaint from a local resident C: Letter from Manchester City Council regarding complaint D: Manchester City Council summary of consultation E: Manchester City Council consultation list
For decision	To decide what action to take

Background

1. The Commission began a review of Manchester City Council in July 2016. The final recommendations were agreed by the Commission in March 2017 and published in April.
2. Shortly before publication of the final recommendations, eight late submissions were received. These submissions all stated that they had not previously been aware of the review. They proposed a change in the boundary between the wards of Moss Side and Ardwick.
3. The late submissions were received after the Commission had met to consider the final recommendations. They could not, therefore, have been taken into account at that meeting.

Issue

4. Following publication of the final recommendations, the Commission received three Freedom of Information (FOI) requests for information about the consultation process and the way in which the late submissions were dealt with.
5. After the FOI requests were responded to, two complaints were received. The complaints claimed that the Commission had failed to meet the requirements to consult set out in both the 2009 Act and the Commission's own technical guidance.
6. The key points in the complaints are:

- There was a failure to achieve the publicity necessary to enable consultation
 - The Commission should have been aware of this failure
 - The lack of publicity gave Manchester City Council an unfair advantage in having their proposed boundaries accepted by the Commission
7. The consultation was carried out in the same way as all other reviews. At the start of the review, we requested a list of local organisations and community groups from Manchester City Council. We wrote to all these organisations with details of the review. We also wrote to the Council, enclosing 100 posters, and asking it to:
- “arrange for copies to be displayed at local information points, and by taking such other steps as you consider appropriate to bring the review to the attention of the public and other interested parties. In particular, we would appreciate it if you could promote the consultation online, via social media and any other channels you would normally use to engage residents.”*
8. There were 142 contacts on the list of local organisations. This is in line with what we would expect from a council of this size. However, as the complaint points out, the list did not include any residents’ associations, and only five community groups.
9. As well as the usual letters and emails sent out, the Commission’s own social media engagement reached 80,000 people and resulted in 7,000 interactions (e.g. clicks on the Facebook page and links through to the website).
10. The complaint states that engaged local residents, such as those involved in residents’ associations, normally find out about relevant consultations in three ways:
- Manchester City Council’s ‘e-bulletin’ email newsletter
 - Manchester City Council’s twitter account
 - Articles in the Manchester Evening News
11. Although the Commission asked the Council to publicise the review, it did not publish it on its ‘e-bulletin’ email, and only re-tweeted the Commission’s tweets instead of writing its own. Press releases sent to the local media went unpublished. Additionally, the complainants suggest that few or none of the 100 posters sent to the Council were displayed. The Council responded that the posters were sent to 23 libraries across the city, though it is not known whether or not the libraries displayed the posters.
12. The Commission’s draft and final recommendations were almost entirely based on the proposals of Manchester City Council, as so few other submissions were received. Only 16 submissions were received in response to the initial consultation, and 14 in response to our draft recommendations.
13. By writing to Manchester City Council and all the local organisations for whom it had details, and by issuing press releases at each stage of the review as well

as publishing information on its online platforms and through targeted social media, the Commission has fulfilled its statutory obligation to publish recommendations and to encourage representations about them. Guidance to the Council outlined the Commission’s own communications strategy and specifically set out our expectations of the Council in this regard.

14. The team has investigated whether this guidance was followed. While the Council’s list of stakeholders might have been more comprehensive, there was a wide distribution that should have led to a cascade, including to community groups and residents’ associations. Manchester City Council has not been treated differently to any other council under review, and the area represented by the complainants was not treated differently to any other part of the city. There is no evidence any particular part of the city was disadvantaged.
15. It is for the Commission to decide whether or not to lay the order.
16. Should the Commission decide not to lay the order, a possible timetable for a new consultation period would be as follows:

Stage	Date
Launch of further draft recommendations consultation	25 July
Close of further draft recommendations consultation	22 August
Final recommendations Commission meeting	19 September
Launch of final recommendations	3 October
Order laid	5 October
Order made	27 November (TBC depending on recess dates yet to be announced)
Elections	3 May 2018

17. This timetable allows for a four-week consultation period. It also allows the order to be made over five months before the next scheduled elections in May 2018.
18. The only statutory requirement is for orders to be made at least 39 days before the election. This 39-day requirement can be achieved even if an extra period of further consultation is required.

Lucy Dunkeyson
The Local Government Boundary Commission for England
June 2017