

**EQUALITIES STATEMENT TO
THE LEGAL AID, SENTENCING AND PUNISHMENT OF OFFENDERS ACT 2012
(LEGAL AID: FAMILY AND DOMESTIC ABUSE) (MISCELLANEOUS
AMENDMENTS) ORDER 2023**

2023 No. 150

1. For the policy proposals contained within the above statutory instrument, we have, on the basis of the available evidence, considered the likely equalities impacts in this Equalities Statement.
2. This statutory instrument makes the following policy changes:
 - a. Brings Special Guardianship Orders in private family law proceedings into scope of legal aid;
 - b. Brings Domestic Abuse Protection Orders into scope of civil legal aid;
 - c. Makes criminal legal aid available for breach of a Domestic Abuse Protection Notice;
 - d. Makes legal aid for Placement and Adoption Orders non-means tested and applies less stringent merits criteria;
 - e. Allows medical practitioners to provide letters of evidence of domestic abuse without an in-person consultation.

Equality Duty

3. Section 149 of the Equality Act 2010 places a duty on Ministers and the Department, when exercising their functions, to have ‘due regard’ to the need to:
 - Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct under the Equality Act;
 - Advance equality of opportunity between different groups (those who share a relevant protected characteristic and those who do not); and
 - Foster good relations between different groups (those who share a relevant protected characteristic and those who do not).
4. Paying ‘due regard’ needs to be considered against the nine protected characteristics under the Equality Act. The nine protected characteristics are race, sex, disability, sexual orientation, religion and belief, age, marriage and civil partnership, gender reassignment, pregnancy and maternity.
5. This is an ongoing duty, and as part of this obligation we will continue to monitor the impact of our proposals.

Methodology to determine potential discrimination

6. Adhering to guidance published by the Equality and Human Rights Commission, our approach to assessing the potential for particular disadvantage resulting from the proposals has been to identify the individuals whom the proposals would impact (the “pool”), and then draw comparisons between the potential impacts of the proposals on those who share particular protected characteristics, with those who do not share those characteristics.
7. Guidance from the Equality and Human Rights Commission states that the pool to be considered at risk of potential indirect discrimination should be defined as those people who may be affected by the policy (adversely or otherwise) and that this pool should not be defined too widely.

Analysis

The pool of affected individuals

8. Statistics about the pool of affected individuals of each policy change has been taken from Legal Aid Agency (LAA) datasets. The LAA collects data on ethnicity, gender, disability and age, and so this equalities statement is limited to an analysis of those four protected characteristics.
9. Statistics about the demographics of the general population have been sourced from the 2021 Census and refer to England and Wales for gender¹, the 2020-21 Family Resources survey for disability,² and the 2011 Census for age³ and ethnicity.⁴ We follow the Government’s preferred style of writing about ethnicity, so the references to ethnic minorities refer to all ethnic groups except the white British group.⁵

Special Guardianship Orders (SGOs)

Policy summary

10. An SGO is a court order which places a child permanently with a special guardian, who is granted full parental responsibility for the child.
11. The policy change will bring SGOs in private family proceedings within the scope of the legal aid scheme, so that legal aid will be available for SGOs whether they are brought within public family or private family proceedings. The same means and merits testing arrangements for the parental party and prospective special guardian will apply to public family and private family SGO proceedings.

The pool of affected individuals

¹ [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/population-and-household-estimates).

² [Family Resources Survey: financial year 2020 to 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/family-resources-survey).

³ [Age groups - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk/age-groups).

⁴ [Population of England and Wales - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk/population-of-england-and-wales).

⁵ [Writing about ethnicity - GOV.UK \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk/writing-about-ethnicity).

12. The datasets used in this statement are taken from 2021-22 LAA data on existing civil legal aid provisions for SGOs, which is limited to civil representation in private family proceedings. We consider that this cohort of individuals is the best proxy we have for the future pool of affected individuals, which are parents/those with parental responsibility and prospective special guardians applying for legal aid for an SGO in a private family proceeding.
13. The available data indicates that 81% of the individuals were female, considerably above the proportion in the general population (51%).
14. The data also shows that 12% (with 30% unknown excluded) of individuals were from an ethnic minority background, below the proportion in the general population (19.5%).
15. 54% (with 30% unknown excluded) of individuals consider themselves to be disabled. This is considerably above the average proportion in the general population where 22% of people consider themselves to have a disability (22% in England, 28% in Wales), and considerably above the data recorded for grants of legal aid from 2020-21 (26%) which was more in line with the general population.
16. The available data indicates that 35% of individuals that have been granted legal aid for SGOs in public family proceedings are between the ages of 45-54, above the proportion in the general adult population (13.7%).

Eliminating unlawful discrimination

Direct discrimination

17. Our assessment is that this policy change is not directly discriminatory within the meaning of the 2010 Act as it applies equally to all individuals who wish to apply or respond to an SGO irrespective of their protected characteristics. We do not consider that this change would result in people being treated less favourably because of a protected characteristic.

Indirect discrimination

18. The data suggests that certain groups with protected characteristics are overrepresented in being granted legal aid – those who are female, those from a white British background, those with a disability and those between 45-54 years old. This means it is likely that they will benefit more from this policy proposal in obtaining legal advice and/or representation for an SGO in private family proceedings than those without those characteristics. As this disproportionality is present in all four of the protected characteristics for which we hold data, we believe this change may be indirectly discriminatory.
19. However, we consider that any disadvantage resulting in indirect discrimination is justified. The policy objective is to increase the availability of legal aid in private family proceedings, and the most proportionate way to achieve that objective was identified as

expanding legal aid scope to SGOs brought in private family proceedings. The policy aims to help prospective special guardians and parents or those with parental responsibility who are involved in SGO proceedings to have access to legal advice and representation in a way that currently is not routinely available under the legal aid scheme.

Eliminating unlawful discrimination in relation to disability and duty to make reasonable adjustments

20. The policy change will extend to disabled individuals who are seeking legal aid. We therefore do not consider that a parental party or prospective special guardian with disabilities will be put in a particular disadvantage from the amendments.
21. In addition, the LAA has a reasonable adjustments policy in place where information and services, whether provided online or on paper, are accessible, clear and simple to read.

Advancing equality of opportunity

22. The intention behind this policy change is to provide legal aid to individuals applying for an SGO in private family proceedings, whether they are the parental party at risk of losing their child or the prospective special guardian who will gain parental responsibility for the child. We consider that the expansion of legal aid in this way positively contributes to advancing equality of opportunity as it could encourage the take up of legal aid by all prospective special guardians and parents/those with parental responsibility, including those who are currently underrepresented in our datasets, such as male individuals or those from an ethnic minority background.

Fostering good relations

23. We have considered this objective and have concluded that it is unlikely to be of particular relevance to the policy change.

Harassment and victimisation

24. We do not consider there to be a risk of harassment or victimisation as a result of the policy change.

The Domestic Abuse Protection Order (DAPO)

Policy summary

25. The DAPO is a type of injunction intended to provide domestic abuse victims with more comprehensive and longer-term protection compared to existing protective orders. This policy change will make legal aid available for DAPOs to both applicants (victims of domestic abuse) and respondents (the perpetrator of domestic abuse), subject to means and merits testing.

The pool of affected individuals

26. As the DAPO is a new type of protective injunction, we have used LAA data from 2021-22 on existing civil legal aid provisions for different types of domestic abuse injunctions (such as non-molestation orders or harassment injunctions). We think this represents the closest pool of data to use as a proxy for applicants and respondents to a DAPO who seek legal aid in the future.

Eliminating unlawful discrimination

Applicants

27. The available data indicates that 95% (with 13% unknown excluded) of individuals who have been granted legal aid to apply for a domestic abuse injunction are female, which is considerably above the proportion in the general population (51%).

28. The data on ethnicity shows that 21% (with 44% unknown excluded) of individuals that have been granted legal aid to apply for a protective injunction are from an ethnic minority background, which is slightly above the general population (19.5%).

29. Of those granted legal aid for protective injunctions in 2020/21, 17% (with 32% unknown excluded) consider themselves to be disabled. This is below the general population (22% in England and 28% in Wales).

30. The age group most represented as those receiving civil legal aid for domestic abuse injunctions currently are those aged 25-34 at 45%. The proportion of this group is larger than the general population, which stands at 13.4%.

Direct discrimination

31. Our assessment is that this policy change is not directly discriminatory within the meaning of the 2010 Act, as the policy applies equally to all individuals seeking legal aid to apply for a DAPO.

Indirect discrimination

32. It is clear from the datasets that some groups with certain protected characteristics will benefit considerably more from this policy than other groups. For example, individuals who are female are shown to overwhelmingly be the recipients of legal aid for protective injunctions, a reality that may continue with the introduction of the DAPO given its similarities to other types of protective injunctions.

33. However, this overrepresentation is somewhat reflective of the gender of victims in domestic abuse cases. The latest statistics on police recorded crime show that 73% of

victims were female in the year ending March 2021, and 74% in the year before that.⁶ Taking these datasets together indicates not only that individuals who are female are more likely to be victims of domestic abuse, but that they are also more likely to be successful in an application for legal aid.

34. Despite this overrepresentation which likely amounts to indirect discrimination, we believe this policy change is justified. The aim of this policy is to ensure that all victims of domestic abuse, whatever their protected characteristics, can access legal aid to obtain a protective injunction. The fairest way to achieve this objective is to expand the scope of legal aid for the benefit of all domestic abuse victims.

Respondents

35. The pool of individuals who have received legal aid to respond to a domestic abuse injunction is particularly small when compared to the number of cases involving applicants. However, this is the best available dataset that we have to use as a proxy for the future pool of affected individuals (respondents to a DAPO).
36. The data shows that the number of female individuals who received legal aid to respond to a domestic abuse injunction is 57%, which is slightly higher than the general population (51%). Male individuals who received legal aid to respond to a domestic abuse injunction was 43%, lower than the population (49%).
37. The proportion of individuals from an ethnic minority background who received legal aid when responding to a domestic abuse injunction is 27% (with 34% unknown excluded), higher than the general population (19.5%).
38. 22% (with 26% unknown excluded) report a disability, which correlates with the proportion in the general population in England (also 22%) but is lower than the proportion in Wales, which is 28%.
39. Of the individuals granted legal aid in 2021-22, the highest proportion were those aged 25-34 (35%) followed by 35-44 (31%). This proportion is much higher than the general population at 13.4% and 14% respectively.

Direct discrimination

40. Our assessment is that the proposed change is not directly discriminatory within the meaning of the 2010 Act, as the proposed change applies equally to all individuals within the scope of the policy who apply for legal aid.

⁶ [Domestic abuse victim characteristics, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk). Note that these statistics are unlikely to show the full picture since many incidents of domestic abuse will not be reported to the police but are useful in giving a broad sense of the characteristics of victims in domestic abuse cases. These statistics have been used in the absence of the comprehensive Crime Survey for England and Wales which was suspended in 2020 due to the Covid-19 pandemic.

Indirect discrimination

41. The data shows us that there are groups which are overrepresented – individuals who are female, those from an ethnic minority background and those between 25-44 years old - and some of these overrepresentations are reflected in CPS prosecution data from 2021-22 for domestic abuse flagged prosecutions⁷. The CPS data indicates that the majority (91.5%) of defendants are male, a contrast to the legal aid dataset where female individuals are the majority of respondents; between 25-59 years old (82.1%), which is similar to the legal aid data, and from a white background (63.2%).⁸ The ethnicity datasets are captured differently so a robust comparison is difficult to make, although the number of defendants from an ethnic minority background is lower than the legal aid dataset (27%) and the general population (19.5%).
42. We remain of the view that if any disadvantages are felt by groups with certain protected characteristics, then it is justified in pursuit of the aim of the policy to facilitate access to justice for respondents to a domestic abuse protection order, by providing them with access to legal advice and representation.

Advancing equality of opportunity

43. We do not consider that this policy will have a negative impact on the duty to advance equality of opportunity.

Eliminating unlawful discrimination in relation to disability and duty to make reasonable adjustments

44. This policy change extends to individuals with disabilities and so we do not consider that individuals with disabilities will be put at a disadvantage as a result of this policy.
45. In addition, the LAA has a reasonable adjustments policy in place where information and services, whether provided online or on paper, are accessible, clear and simple to read.

Fostering good relations

46. Consideration has been given to this objective that indicates it is unlikely to be of particular relevance to this policy change.

Harassment or victimisation

47. We do not consider there to be a risk of harassment or victimisation as a result of this policy change.

The Domestic Abuse Protection Notice (DAPN)

Policy summary

⁷ [CPS data summary Quarter 4 2021-2022 | The Crown Prosecution Service](#).

⁸ 25.2% did not provide any ethnicity data. The other reported ethnicities were Arab or Other (0.8%), Asian (4.4%), Black (4.4%) and Mixed (2.0%).

48. The DAPN is a police-issued notice which will provide victims of domestic abuse immediate protection for up to 48 hours. The amendment will provide for criminal legal aid for individuals subject to a DAPN, in keeping with the Government's policy that individuals being held in custody have access to legal aid.

The pool of affected individuals

49. As the DAPN is a new type of notice, we have used existing LAA data on Domestic Violence Protection Notices, which the DAPN is replacing, to perform this assessment. We have also used 2019-2020 data, rather than 2020-21, to avoid any distortions due to the Covid-19 pandemic, as it has been widely reported that there was an increase in demand for victim services during the pandemic.⁹

50. The available data indicates that 89% (with 6% unknown) of individuals that have been granted criminal legal aid for breach of a DVPN are male which is above the proportion in the general population (49%).

51. In regard to ethnicity, the data shows that 9.4% (14% unknown) of individuals that have been granted legal aid are from an ethnic minority background, which is below the general population (19.5%).

52. We can broadly see from the data that the age group most represented as those receiving criminal legal aid for breach of a DVPN is 30-39 at 35%. The proportion of this group is larger than the general population by around 5%.

Eliminating unlawful discrimination

Direct discrimination

53. Our assessment is that the proposed change is not directly discriminatory within the meaning of the 2010 Act, as the proposed change applies equally to all individuals within the scope of the policy who apply for legal aid.

Indirect discrimination

54. The data shows that there is a clear overrepresentation of male individuals, who are most likely to be granted legal aid for breach of a DVPN compared to female individuals. Despite this overrepresentation, we believe any benefits received by one group over another is proportionate. The legitimate policy aim is to ensure access to criminal legal aid for those detained in police custody and put respondents to the new DAPNs on the same footing with regards to access to legal aid as other detainees in police custody.

Advancing equality of opportunity

⁹ Between April 2020 and February 2021, Refuge's National Domestic Abuse Helpline saw an increase of 61%: [A year of lockdown: Refuge releases new figures showing dramatic increase in activity – Refuge](#).

55. We believe that this policy will not have a negative impact on the duty to advance equality of opportunity.

Eliminating unlawful discrimination in relation to disability and duty to make reasonable adjustments

56. We do not consider that respondents to a DAPN with disabilities will suffer from any disadvantages as a result of this policy. In addition, the LAA has a reasonable adjustments policy in place where information on legal aid services, whether provided online or on paper, are accessible, clear and simple to read.

Fostering good relations

57. Consideration has been given to this objective that indicates it is unlikely to be of particular relevance to the proposal.

Harassment or victimisation

58. We do not consider there to be a risk of harassment or victimisation as a result of this policy.

Placement and Adoption Orders

Policy summary

59. These policy changes will extend non-means tested legal aid for parents or those with parental responsibility who wish to oppose a placement order and/or an adoption order. It will also allow for a less stringent merits tests for placement orders and adoption orders to ensure consistency in line with other Special Children Act cases.

Placement orders

The pool of affected individuals

60. The number of placement orders has decreased steadily over the past 5 years (102 in 2016-17 to 47 in 2021-22). We are therefore reporting the values from multiple years to give a broader sense of the protected characteristics of individuals responding to placement orders.

61. The available data generally shows that female individuals are more likely to be recipients of legal aid, ranging from a high of 77% in 2021-22 to a low of 54% in 2017-18. The proportion of female individuals in the general population is 51%.

62. The data shows that white British individuals are more likely to be in receipt of civil legal aid, although the percentage varies from 77% (with 16% unknown excluded) in 2019-20 up to 94% (with 13% unknown excluded) in 2020-21. The proportion of the population who identify as white British is 80.5%.

63. In 2021-22, 26% of individuals consider themselves to be disabled (with 28% unknown excluded). The lowest percentage of individuals reporting a disability was 13% (with 13% unknown excluded) in 2018-19. The proportion of individuals in the general population who consider themselves to have a disability is 22% (22% in England, 28% in Wales).
64. Recipients of legal aid are more likely to be between the ages of 18-44. In 2021-22, 53% of individuals were between 25-34, with 28% between 18-24 and 15% between 35-44 respectively. The data from previous years shows that 25-34 is the most common reported age, although these individuals only make up 13.4% of the general population.

Eliminating unlawful discrimination

Direct discrimination

65. Our assessment is that this policy change is not directly discriminatory within the meaning of the 2010 Act as they apply equally to all individuals who oppose a placement order irrespective of their protected characteristics. We do not consider that it would result in people being treated less favourably because of a protected characteristic.

Indirect discrimination

66. It is difficult to draw firm conclusions from the limited dataset. The most obvious trends are that individuals between the ages of 25-34 and female individuals are most likely to be in receipt of legal aid, and this is always above the proportion within the general population.
67. We do not think this policy is indirectly discriminatory. We will be considering, as the policy is implemented, whether there are any particular disadvantages felt as a result of this change. At the moment, we are satisfied that any disadvantages are justified in pursuit of the policy objective of ensuring consistency of treatment, for legal aid purposes, between placement order cases and other Special Children Act cases. We are also fulfilling the overarching policy objective of ensuring parents, or those with parental responsibility, who are at risk of losing their child(ren) can access non-means tested legal advice and representation.

Advancing equality of opportunity

68. We think that this change will positively impact on the duty to advance equality of opportunity. This change is intended to improve access to legal aid for parents and those with parental responsibility in placement order proceedings, making it easier for them to obtain advice and representation when faced with the prospect of losing their child(ren). We think the benefit of legal advice and representation may encourage more parents or those with parental responsibility to seek legal aid.

Eliminating unlawful discrimination in relation to disability and duty to make reasonable adjustments

69. This policy change applies equally to parents or those with parental responsibility with disabilities as they do to those without disabilities. We do not consider that there will be any particular disadvantages felt.

Fostering good relations

70. We have considered this objective and have concluded that it is unlikely to be of particular relevance.

Harassment and victimisation

71. We do not consider there to be a risk of harassment or victimisation as a result of this change.

Adoption orders

The pool of affected individuals

72. We have used existing data on adults applying for legal aid for an adoption order as the pool of people who will be affected by the policy changes (removing the means test and replacing the merits test with a less stringent test).

73. The available data generally shows that female individuals are more likely to be recipients of legal aid, which was 75% of individuals in 2021-22. The proportion of female individuals in the general population is 51%.

74. In 2021-22, 82% (with 27% unknown excluded) of individuals were from a white British background and 18% from an ethnic minority background, slightly under the general population where 19.5% are from an ethnic minority background.

75. In 2021-22, 33% (with 28% unknown excluded) of individuals receiving legal aid consider themselves to be disabled. The proportion of individuals in the general population who consider themselves to have a disability is 22% (22% in England, 28% in Wales).

76. Recipients of legal aid are most likely to be between the ages of 18-44. In 2021-22, 47% of individuals were between 25-34, considerably higher than the general population where only 13.4% of individuals are between the same age.

Eliminating unlawful discrimination

Direct discrimination

77. Our assessment is that this change is not directly discriminatory within the meaning of the 2010 Act. The policy change applies equally to all parents or those with parental responsibility who are opposing an adoption order.

Indirect discrimination

78. The data suggests that female individuals, those with a white British background, those with disabilities and those between 25-34 years old are overrepresented in our datasets in having been granted legal aid for adoption proceedings. If this overrepresentation amounts to indirect discrimination, we consider that it is justified in pursuit of the policy objective of ensuring consistency between these cases and other Special Children Act cases.

Advancing equality of opportunity

79. We think that this change will positively impact on the duty to advance equality of opportunity. This change is intended to improve access to legal aid for parents and those with parental responsibility in adoption order proceedings, making it easier for them to obtain advice and representation when faced with the prospect of losing their child(ren). We think the benefit of legal advice and representation may encourage more parents or those with parental responsibility to seek legal aid in adoption order proceedings, including those groups who are generally underrepresented in our datasets.

Eliminating unlawful discrimination in relation to disability and duty to make reasonable adjustments

80. This policy change extends to disabled individuals who are seeking legal aid. We therefore do not consider that individuals with disabilities will be put in a particular disadvantage from the proposal.

Fostering good relations

81. We have considered this objective and have concluded that it is unlikely to be of particular relevance to this policy change.

Harassment and victimisation

82. We do not consider there to be a risk of harassment or victimisation as a result of this change.

Letters of evidence of domestic abuse provided by health professional

Policy summary

83. To access civil legal aid in private family law as a victim of domestic abuse for non-urgent cases, for example divorce, an applicant must provide supporting documentation evidencing that they are, or are at risk of being, a victim.

84. One type of acceptable evidence is a letter or report from a health professional following a face-to-face consultation. Now that ways of working have changed in response to the Covid-19 pandemic, the proposed amendment will permit that letter or report from a health professional to be produced following a face-to-face, phone or video conferencing

consultation, in line with what the health professional feels is the most appropriate way to treat their patient.

The pool of affected individuals

85. The pool of affected individuals are domestic abuse victims who are applying for legal aid whose application contains evidence from a health professional. We have used data captured in 2021-22 to perform the following assessment.
86. The available data indicates that 73% (with 1% unknown) of relevant individuals that have been granted legal aid are female, which is above the proportion in the general population (51%).
87. In regard to ethnicity, the data shows that 21% of relevant individuals that have been granted legal aid are from an ethnic minority, which is above the general population (19.5%), although a robust comparison is difficult since 31% of the relevant individuals granted legal aid did not report their ethnicity.
88. 18% considered themselves to be disabled. This is below the general population (22% in England and 28% in Wales), although 25% of individuals granted legal aid did not report their disability status.
89. We can broadly see from the data that the age group most represented as those relevant individuals that have been granted legal aid currently are those aged 25-34 at 40%. The proportion of this group is larger than the general population which is 13.4%.

Eliminating unlawful discrimination

Direct discrimination

90. Our assessment is that the proposed amendment is not directly discriminatory within the meaning of the 2010 Act, as the proposed change applies equally to all individuals within the scope of the policy who apply for legal aid.

Indirect discrimination

91. We can see from the dataset that certain groups are overrepresented within our datasets, which means they are disproportionately more likely to benefit from this policy change than their counterparts. Individuals who are female, those without a disability, those from a white British background and those between 25-34 years old are more likely to benefit from this policy change.
92. Whilst the over- and underrepresentation in some groups is evident in our datasets, we believe that if it does amount to indirect discrimination, that it is justified.
93. The intention behind this policy is to make it easier for victims of domestic abuse to access legal aid as well as reduce the burden on health professionals who provide this

evidence. The simplest way to achieve this intention was to change the rules for the group at large (victims of domestic abuse) and allow victims of domestic abuse to be able to meet the evidence requirements irrespective of the way they met their health professional.

Advancing equality of opportunity

94. We believe that this amendment will positively contribute to the duty to advance equality of opportunity. This policy is intended to ensure that victims of domestic abuse no longer have to insist on a face-to-face consultation with a health professional in order to be able to submit a letter of evidence for legal aid funding. This change will mean that the decision on how to treat their patient properly rests with the health professional, and whether a consultation is over video conferencing, the phone, or face-to-face, health professionals can continue to provide this vital service to victims of domestic abuse, and victims of domestic abuse can access the legal aid funding they require.
95. We hope that this change will remove any disadvantage that may have previously been suffered by individuals with a protected characteristic who were required to seek a face-to-face appointment.

Eliminating unlawful discrimination in relation to disability and duty to make reasonable adjustments

96. We do not consider that this amendment will result in individuals with a disability being treated any differently to individuals without a disability. As above, we hope that this amendment will remove any disadvantage that may previously have been suffered, for example, if an individual with a disability previously found it difficult to attend face-to-face appointments with a health professional, this policy change will remove that barrier.
97. The LAA has a reasonable adjustments policy in place where information on legal aid, whether provided online or on paper, is accessible, clear and simple to read.

Fostering good relations

98. Consideration has been given to this objective that indicates it is unlikely to be of particular relevance to this amendment.

Harassment or victimisation

99. We do not consider there to be a risk of harassment or victimisation as a result of this amendment.