# Site Level Equality Analysis for: Finchley Jobcentre, 40 Ballards Lane, London N3 2BL

Site reference: 71195

Date: 12 May 2017

Completed by:

### Introduction

This document records the analysis undertaken by the Department to enable the decision maker to fulfil the requirements placed on them by the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010.

The PSED requires the decision maker to pay due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

In undertaking the analysis that underpins this document, where applicable, the Department has also taken into account the following:

- a) United Nations Convention on the Rights of Persons with Disabilities, in particular Article 9 on Accessibility (to services and buildings) and Article 27 on Work and Employment (in relation to employees); and
- b) United Nations Convention on the Rights of the Child, Article 3(1) (best interests of the child) when considering whether those with parental responsibilities may be affected by the proposal.

This equality analysis should be read together with the High Level Equality Analysis:

- Equality Analysis for Tranche 1, People and Locations Project dated September 2015
- Equality Analysis for Tranche 2, Front of House, People and Locations Project dated January 2016
- Equality Analysis for Tranche 2, Back of House, Corporate and Technology and Transformation Hubs, People and Locations Project dated January 2016

This equality analysis will be considered together with other relevant documents that form part of the Business Case when a final decision on the proposal is made.

# Brief outline of the proposal

Please refer to the High Level Equality Analysis which sets out the general background to this proposal.

The proposal is to divest Finchley Jobcentre [site reference 71195] and import all staff and service delivery into Barnet Jobcentre 15-17 Western Parade, Barnet, Herts, EN5 1AH. [site reference 2717]. The move involves 12 Jobcentre Front of House staff.

The distance between the two jobcentres is:

- 3.4 miles by road
- Travel time by public transport: Approximately 23 minutes (London Underground)
- Travel time by car: 12 minutes [figures taken from Google maps]

This proposal is outside of the Ministerial Criteria and has been subject to a public consultation exercise.

# Evidence and analysis

#### Potential impact on members of the public, external stakeholders or partners

There were a total of twelve responses; eight came from the public, one from a claimant, two from organisations and one from a Member of Parliament Mike Freer. All highlighted issues around the additional travelling time and 6 also referred to the additional cost that would be incurred as a result of the transfer to Barnet.

Four responses made reference to disability; all from members of the public. One member of the public also made reference to gender.

None of the responses indicated support for the proposal.

The issues raised were as follows;-

- Travel time; All 12 respondents were concerned about the increase in travel time.
   These related specifically to longer journey times, inconvenience and increased difficulties. Typical comments:
  - "...the estimation of travel time by bus or car is completely unpredictable, even outside of rush hour; Finchley from Central to North can become gridlocked in the middle of the day. The tube of course is more predictable, but expensive for the fortnightly signing on and less frequent out of rush hour times..."
  - "...the travel time from Finchley to Barnet job centre is estimated by the DWP as 12 minutes by car and 23 by public transport.... the journey by bus takes far more than 23 minutes. TfL give a travel time of double that yet, in my experience, at mid-morning it takes the best part of an hour..."

- "...it (travel time) doesn't take into account the uncertainties of buses running to schedule or sudden problems with traffic that can delay people..."
- **Travel cost**; six respondents expressed concern about the potential increase in travel costs and the impact this would have on disposable income. Typical comments:
  - "...the biggest impact will be felt by those currently within walking distance (e.g. one mile for those with no health issues) of Finchley and Edgware jobcentres who have not previously had to incur any costs to attend the jobcentre..."
  - "...we are concerned about ... the additional cost to services users brought about by the extra travel distance..."
  - "...my constituents will be able to apply for reimbursed travel, but this presents a cash flow problem because there is a delay between purchasing bus and/or train fares and having them reimbursed..."
- Access to services; Three respondents expressed concern that closing Finchley
  Jobcentre would have an adverse impact on the local community, removing access to
  services and support for vulnerable benefit claimants and those seeking work. Typical
  comments:
  - "...it is likely to affect both of my disabled children in the future travel is very difficult for people with disabilities..."
  - "...the proposal makes no mention on the growing number of people with mobility issues who no longer qualify to stay off work (ESA) and are currently required to sign on. For these claimants any additional travel could have a very negative impact in their prognosis..."
  - "...the very nature of being a claimant means that every effort must be made to provide easily accessible services that don't require access to an online account..."
- Sanctions; Three respondents expressed concern that the number of sanctions issued would increase if the proposed jobcentre closure went ahead. Typical comments:
  - "...if people are late for appointments because of a sudden traffic problem, particularly people who may have been able to walk to the Finchley centre and in the early days of transfer haven't been able to assess how long the journey will take in different circumstances, they may be sanctioned..."
  - "...we are concerned about the risk of people receiving financial penalties for being late for appointments. This would have a detrimental effect on claimants and their families..."
- Outreach; Three respondents expressed the view that a 'footprint' or outreach facility should be left in the Finchley area. Typical comments:

- "...maybe in Finchley Central library but this should not replace the jobcentre which has all the facilities nearby..."
- "...Barnet Council has a good track record of working in partnership with DWP to provide services from community and other venues.... It is essential that this joint working continues, and that claimants are able to undertake formal DWP processes at these sites as well as receiving advice and guidance..."
- "...any outreach support should be in addition to the current 4 jobcentres not instead of..."

# **Race or Ethnicity** – what potential impacts have been identified and how are they to be addressed

	Ethnic Minority	White
Barnet	35.87%	64.13%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Barnet/Finchley area is nearly 50% more than national average.

Despite this variation, no evidence has been presented to suggest that the proposal would have an adverse impact on members of the public because of their race or ethnicity. It should be noted that all claimants should receive personalised tailored support, taking account of individual circumstance recognising capability (including health conditions), disability, language barriers and caring responsibilities. Claimants, including those who are vulnerable, are only asked to agree reasonable steps appropriate to individual circumstances.

DWP must make suitable provision to communicate with claimants and customers who do not speak English or Welsh (for people residing in Wales), or who are deaf, hard of hearing or speech impaired. Where the client has no-one who can support them (or for new JSA claimants considered to be in a vulnerable situation) then staff may use the contracted interpreting services: Telephone interpreters are provided by *thebigword*. Face to face interpretation using the contracted supplier, *Prestige*, is also available but normally only used in a limited number of circumstances (primarily fraud interviews and interviews that require British Sign Language or non-spoken languages.)

DWP acknowledges that the proposals may increase travel time and costs for claimants when they are required to attend Barnet. This will be particularly so for those who currently live within easy reach of Finchley.

The reimbursement of travel costs, out with mandatory attendance, is considered on an individual basis in line with DWP regulations nationally. This is not new and is the case for any claimant required to attend a jobcentre throughout the UK.

Concern about public transport is an everyday issue and will continue to be considered on an individual basis. However, DWP recognises that some claimants will be taking an

unfamiliar journey: Work coaches will support claimants, using interpreting services as appropriate, over the transition period until they become familiar with new travel arrangements.

Claimants can also choose to attend a jobcentre that is closer to their home. Work coaches will help sign post claimants in such circumstances.

DWP is committed to moving the full staff allocation from Finchley jobcentre to Barnet Jobcentre. These proposals will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver a full Service across all jobcentres.

# **Disability** – what potential impacts have been identified and how are they to be addressed

	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited
Barnet	6.59%	7.42%	86.00%
National	8.5%	9.4%	82.00%

Source: Census 2011 QS303EW (Long-term health problem or disability)

The percentage of the public in Barnet with a disability that limits day to day activities is lower than the national average. The data does not provide a breakdown of the types of disability or specific details on the type of impact that would be experienced.

Following a public consultation the Department received four submissions referring to the potential impact on those with a disability. All were from members of the public and include one from a local councillor. The issues raised were as follows:-

- "travelling to High Barnet isn't either cheap or quick or easy. It is likely to affect both of my disabled children in the future - travel is very difficult for people with disabilities"
- ''Claimants, mothers with children and those with disabilities cannot easily access another site and the availability of Finchley Central tube station makes this a convenient location"
- "The proposal makes no mention on the growing number of people with mobility issues who no longer qualify to stay off work (ESA) and are currently required to sign on. For these claimants any additional travel could have a very negative impact in their prognosis"
- "I do not agree with the proposal because it will take at least 20 minutes to travel from Finchley Central to Barnet by bus (263) or tube. If there are any problems with transport may incur a benefit sanction. I am concerned about people with disabilities who no longer qualify to stay off work (on ESA) and have to sign on".

In summary the comments refer to concerns over additional cost and time, impact of travel and access issues for people with disabilities, sanctions that could be incurred due to late attendance at the Barnet Job Centre.

#### Mitigation

#### Costs

DWP acknowledge that the proposals included in the consultation may increase travel costs for some claimants when they are required to attend a jobcentre. This will be particularly so for those who currently live within easy reach of their current jobcentre.

The reimbursement of travel costs, other than mandatory attendance, is considered on an individual basis in line with DWP regulations nationally. This is not new and is the case for any claimant required to attend a jobcentre throughout the UK.

Support to meet travel costs is also available to eligible claimants via the Jobcentre Plus Travel Discount Card. Claimants can also request to attend a jobcentre closer to their home, should there be one. Work coaches will help sign post claimants in such circumstances.

DWP recognise that some claimants will be taking an unfamiliar journey so work coaches will support them over the transition period until they become familiar with new travel arrangements. *Annex A* contains travel information for claimants travelling from the Finchley area to Barnet Jobcentre.

#### Impact of travel and access

DWP acknowledges that there is likely to be an impact on claimants with a physical or mental impairment that either affects their mobility and for those with caring responsibilities and has carefully considered all responses. It is likely that those with a physical or mental impairment that affects either their mobility or ability to change site will be impacted by this proposal. The Department has therefore considered the type of impact in the worst case scenario whilst recognising that in some cases the impact may be positive – for example, where the journey involves less time, distance or changes for the individual.

The Finchley office is approximately 3.4 miles from Barnet. It is recognised that the additional distance can amount to a considerable difficulty for a disabled person either in walking this extra distance, or the change it will cause to their journey. DWP recognise that some claimants will be taking an unfamiliar journey so work coaches will support them over the transition period until they become familiar with new travel arrangements.

DWP's work coaches personalise the support provided for each claimant based on individual need and circumstance. Where claimants have limitations due to a health condition or disability or because of caring responsibilities, then this is taken into account when arranging any attendance. DWP has various ways of interacting with vulnerable claimants, including face-to-face, email, telephone, post and SMS.

Most severely disabled with significant physical or mental impairment are not required to attend the jobcentre, but can do so on a voluntary basis. In these circumstances home visits can be arranged, interviews can be conducted by telephone and claimants contacted by email. If the customer with significant mobility issues wishes to attend the jobcentre taxi fares for them and a carer, if required, can be reimbursed.

The Department has also taken into account that some disabled customers will have needs in relation to accessibility (e.g. wheelchair users). The Barnet building is compliant

with the requirements of the Equality Act 2010.

For disabled customers that qualify for ESA as part of the Work Related Activity Group, travelling expenses can be refunded for pre-arranged interviews in connection with their benefit claims, or attendance that includes a medical examination or work capability assessment. These claimants are responsible for fares to attend mandatory interviews which are held twice a year. The impact on this this group will be relatively low due to infrequency of site visits and interviews can take place in a jobcentre closest to their homes.

#### **Sanctions**

The Department does not expect any proposed changes to our estate in itself to result in additional benefit entitlement sanctions. The Department does not collect this data for specific geographical areas. Work coaches will continue to work with claimants to ensure they know and understand what is expected.

The National Audit Office has estimated that a million jobseekers missed appointments, across the United Kingdom, between July 2015 and December 2015 compared with only 34,000 sanction referrals. Work is on-going to ensure claimants understand and agree expectations with their work coaches.

DWP is committed to moving the full staff allocation from Finchley jobcentre to Barnet Jobcentre. These proposals will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver a full service across all jobcentres.

The overall aim is to provide an enhanced service in jobcentres: IT equipment will be moved and rehoused in the new offices. Claimants will continue to be encouraged to bring their own electronic devices into jobcentres to make good use of DWP's free Wi-Fi to help them manage their online claim and support their job search activities. Dedicated staff will be available to support claimants by delivering services and additional support in our digital suites.

Gender – what potential impacts have been identified and how are they to be addressed

	Male	Female
Barnet	48.45%	51.55%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The percentages are broadly similar to that of the national averages.

Following a public consultation the Department received one submission referring to the potential impact on gender. It was from a member of the public who is also a local

councillor. The issue raised was as follows; -

• ''Claimants, mothers with children and those with disabilities cannot easily access another site and the availability of Finchley Central tube station makes this a convenient location"

#### Mitigation

The proposal will have an impact on those with caring responsibilities (either children or disabled people) which is likely to contain a higher proportion of women. The Department has considered the worst case scenario in assessing potential impacts of the proposal. In some cases the additional distances will result in a small increase in journey time for customers that can affect their caring responsibilities. For example, a mother will have to pick up their child from school at fixed times.

The Department agrees claimants should not have to make excessively long or difficult journeys to attend a Jobcentre and the Department remains committed to ensuring reasonable adjustments are made for people with caring responsibilities to make sure appropriate support is given. Jobcentre staff will offer advice on the options available in terms of alternative offices.

- Those with young children, lone parents with children under the age of one are not required at attend a work coach interview but may choose to do so on a voluntary basis. Any contact can be conducted by telephone or email.
- Lone parents whose youngest child is between the age of 1 and 3 are required to attend mandatory interviews every 6 months, but may choose to engage more frequently on a voluntary basis. Once the youngest child reaches the age of 4 the claimant is required to attend work coach interviews quarterly, again they may choose to engage with their work coach more frequently on a voluntary basis.
- Once the youngest child reached the age of 5 the claimant will claim Jobseekers Allowance (JSA) and attend on a fortnightly basis, travelling costs will be their personal responsibility. Travelling expenses can be refunded for any additional interviews that may be necessary.

Claimants must be offered postal status when they have caring responsibilities and are unable to make arrangements for short-term care to cover their attendance, for example for a child during school holidays.

Concern about public transport is an everyday issue and will continue to be considered on an individual basis. However, we recognise that some claimants will be taking an unfamiliar journey: work coaches will support claimants as appropriate over the transition period until they become familiar with new travel arrangements. Claimants can also choose to attend a jobcentre that is closer to their home. Work coaches will help sign post claimants in such circumstances.

DWP is committed to moving the full staff allocation from Finchley jobcentre to Barnet Jobcentre. These proposals will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver a full service across all jobcentres.

The overall aim is to provide an enhanced service in jobcentres: IT equipment will be

moved and rehoused in the new offices. Claimants will continue to be encouraged to bring their own electronic devices into jobcentres to make good use of DWP's free Wi-Fi to help them manage their online claim and support their job search activities. Dedicated staff will be available to support claimants by delivering services and additional support in our digital suites.

Annex A contains travel information for claimants travelling from the Finchley area to Barnet Jobcentre.

Age – what potential impacts have been identified and how are they to be addressed

	16-17	18-19	20-24	25-29	30-44	45-59	60-64
Barnet	3.77%	3.15%	10.19%	13.39%	35.73%	26.57%	7.21%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

The age range data in Barnet is similar to the national averages

A Public Consultation has taken place concerning the proposal for a site move to Barnet. No evidence has been presented in any of the Public Consultation submissions to suggest that the proposal would have an adverse impact on age equality issues or affect the other aims of the equality duty in relation to age.

- The Department considers that any negative impacts can be mitigated as part of business as usual at the Barnet Jobcentre, by applying existing practices and policies where a claimant has difficulty attending the office.
- DWP acknowledges that the proposals included in the consultation may increase travel time and costs for both young and older claimants when they are required to Barnet Jobcentre. This will be particularly so for those who currently live within easy reach of Finchley jobcentre.
- The reimbursement of travel costs, out with mandatory attendance, is considered on an individual basis in line with DWP regulations nationally. This is not new and is the case for any claimant required to attend a jobcentre throughout the UK.
- Concern about public transport is an everyday issue and will continue to be
  considered on an individual basis. However, we recognise that some claimants will
  be taking an unfamiliar journey: work coaches will support claimants, using
  interpreting services as appropriate, over the transition period until they become
  familiar with new travel arrangements. Claimants can also choose to attend a
  jobcentre that is closer to their home. Work coaches will help sign post claimants in
  such circumstances.

**Religion / Beliefs** – what potential impacts have been identified and how are they to be dealt with

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion	Religion not stated
Barnet	41.21%	1.27%	6.15%	15.18%	10.31%	0.36%	1.06%	16.08%	8.39%
National	58.86%	0.15%	0.16%	0.04%	0.75%	0.33%	0.21%	32.66%	6.85%

Source: Census Data 2011 KS209EW (Religion)

Despite the differences from the national average, no issues have been identified as regards this protected characteristic.

A Public Consultation has taken place concerning the proposal for a site move to Barnet. No evidence has been presented in any of the Public Consultation submissions to suggest that the proposal would have an adverse impact on religion related equality issues or affect the other aims of the equality duty in relation to religion/belief.

#### Other protected characteristics

# Sexual orientation, Gender reassignment, pregnancy and maternity, marriage and civil partnership

No evidence has been presented in any of the Public Consultation submissions or otherwise identified to suggest that the proposal would have an adverse impact on those with any of these protected characteristics, or affect the other aims of the equality duty in relation to these groups.

Should the need arise, consideration will be given on a case by case basis where there might be a need to conduct confidential or sensitive conversations in a separate room.

**Any other equality impacts** – what potential impacts have been identified that are not covered by the above categories and how are they to be addressed

None

#### Potential impact on members of staff

#### Summary of one to one conversations

One—to-one discussions have been held with all 12 of the staff on the Finchley site, which is a front of house job centre. It is proposed that the staff will relocate to Barnet Jobcentre, EN5 1AQ which is 3.4 miles away, 12 minutes by road, and 23 minutes by train.

staff raised concerns regarding mobility as the journey to Barnet will take them above their mobility barrier of 60 minutes

No issues have been received from external suppliers. External suppliers will have been informed of the planned office closure and relocation as part of the stakeholder engagement and planned communication between the Department and the provider. They have been asked to provide details of any potential impact of the proposal on their staff.

Race or Ethnicity – what potential impacts have been identified and how are they to be addressed

	Ethnic Minority	White	Unknown
Finchley	60.00%	33.33%	6.67%
All DWP	8.97%	65.17%	25.86%

Source: Resource Management, December 2016

The percentage of ethnic minorities in the Finchley office is significantly higher [+51%] than the DWP average.

It is not anticipated that any staff would be disproportionately impacted because of their race or ethnicity. No evidence has been presented following the 1-2-1 discussions or from elsewhere to suggest that the proposal would have a negative (or positive) impact on this group.

**Disability** – what potential impacts have been identified and how are they to be addressed

	Disabled	Non-Disabled	Unknown
Finchley	0.00%	93.33%	6.67%
All DWP	5.63%	73.06%	21.31%

Source: Resource Management, December 2016

The percentage of staff with a disability in the Finchley office would appear to be below the DWP average, although there is a percentage of "unknowns" so the variation from average is not certain. Also, the data held does not cover the type of impairments any disabled employees might have, or how they may be impacted by the changes.

However, no issues have been raised in one-to-one meetings with staff around building access or transport which may impact staff with a disability. No other issues have been identified. No members of staff have been identified as requiring a reasonable adjustment related to mobility due to a disability. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not Should any issues arise, the Department considers that any negative impacts can be mitigated as part of business as usual at the office, by applying existing practices and policies.

Gender – what potential impacts have been identified and how are they to be addressed

	Male	Female
Finchley	13.33%	86.67%
All DWP	32.18%	67.82%

Source: Resource Management, December 2016

Finchley has a higher percentage [+19%] of female staff than all DWP.

The proposal could have an impact on those with caring responsibilities (for children or disabled people) which is likely to contain a higher proportion of women. The Department has to consider the worst case scenario in assessing potential impacts of the proposal. In some cases the additional distance could result in an increase in journey time for staff that can affect their caring responsibilities. For example a mother will have to pick up their child at fixed times.

However no issues have been raised in the course of the staff one-to-ones or from elsewhere. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not Should any arise, the Department considers that any negative impacts can be mitigated as part of business as usual at the office, by applying existing practices and policies, e.g. flexible working patterns.

**Gender Reassignment** – what potential impacts have been identified and how are they to be addressed

No data is collected on the number of staff affected by gender reassignment.

It is not anticipated that staff would be disproportionately impacted because of gender reassignment as a result of the Estate Strategy and any potential relocation. No evidence has been presented following the 1-2-1 discussions or from elsewhere to suggest that the proposal would have a negative (or positive) impact on this group. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not

There may be a need for rooms to be available for confidential conversations; DWP will provide this provision as required.

Age – what potential impacts have been identified and how are they to be addressed

	16-24	25-34	35-44	45-54	55- 64	65+
Finchley	0.00%	0.00%	20.00%	40.00%	26.67%	13.33%
All DWP	2.92%	11.20%	22.39%	38.19%	23.83%	1.47%

Source: Resource Management, December 2016

The main variations in relation to age on the Finchley site, when compared to DWP, are within the 16 – 34 bracket were Finchley is lower [- 14%] and 65+ age bracket were Finchley is higher [+11%]. The remainder are broadly similar

Whilst the age distribution shows a variations against the DWP averages for these age groups, no evidence has been presented following the 1-2-1 discussions or from elsewhere to suggest that the proposal would have a negative (or positive) impact on anyone because of their age as a result of the office move to the nearby location at Barnet. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not

**Sexual Orientation** – what potential impacts have been identified and how are they to be addressed

Some voluntary data is collected by DWP on this protected characteristic, but the reporting level is low. The Department does not envisage that the proposal would have a particular adverse impact on those with any of these protected characteristics, or affect the other aims of the equality duty in relation to these groups.

No evidence has been presented following the 1-2-1 discussions or from elsewhere to suggest that the proposal would have a negative (or positive) impact on this group. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not. There may be a need for rooms to be available for confidential conversations; DWP will provide this provision as required.

**Religion / Beliefs** – what potential impacts have been identified and how are they to be addressed

DWP gathers some information on the religions and beliefs held by staff, however completion is voluntary and numbers cannot be broken down to an individual site level. DWP policy includes the provision, where possible in their buildings, for a Quiet Room for staff to use for prayer and contemplation.

No evidence has been presented following the one-to-one discussions with staff that members of staff are disproportionately impacted because of their religion or belief as a result of this office move. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not

**Pregnancy / Maternity** – what potential impacts have been identified and how are they to be addressed

At this stage it is not anticipated that pregnant staff or those on maternity leave would be disproportionately impacted as a result of the Estate Strategy and any potential relocation. Any member of staff on maternity leave will have an automatic right to relocate to a similar job role, without the need to complete any kind of selection exercise for particular job roles. Any member of staff who is pregnant will be fully consulted before and during their maternity leave to ensure they will not be at a disadvantage due to their pregnancy or maternity leave. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not

No member of staff has been identified as being currently on maternity or paternity leave.

**Marriage and civil partnership** – what potential impacts have been identified and how are they to be addressed

While DWP collects data on next of kin, no data has been available from the Resource Management system for the compilation of this equality analysis.

It is not anticipated that staff would be disproportionately impacted because of their marriage or civil partnership as a result of the proposed move. No evidence has been presented following the 1-2-1 discussions or from elsewhere that the proposal would have a negative (or positive) impact on people with this protected characteristic

**Any other equality Impacts** – what potential impacts have been identified that are not covered by the above categories and how are they to be addressed

#### **Work Pattern**

	Full-time	Part-time/Part Year
Finchley	66.67%	33.33%
All DWP	59.74%	40.26%

Source: Resource Management December 2016

The Finchley office has a lower proportion of part time or part year staff than the DWP average.

No other significant risks with regard to equality issues have been identified and wider consultation has not been considered necessary at this stage. All staff likely to be impacted will be engaged by their managers in frequent one to one discussions, with the opportunity to explore their options and access the full range of support offered by DWP under Departmental workforce management and equality policies. Local Human Resources Business Partners and Trade Union representatives will be kept informed of all developments and will be available for staff to consult about their particular circumstances.

# Summary of equality impacts

#### **Background**

This proposal is to divest Finchley Jobcentre [Ref 71195] and import all staff and service delivery into Barnet Jobcentre (Ref 2717) EN5 1AQ. Barnet is located 3.4 miles away, 12 minutes by road or 23 minutes by tube.

Barnet will increase staff from 109, moving in approximately 12 from Finchley which will greatly increase utilisation of this building.

#### Impact on staff currently located at Finchley

One-to-one discussions have been held with all 12 of the staff on the Finchley site, which is a front of house job centre.

Eleven staff are within mobility and will qualify for excess fares.

impacted by th	ne divestment.	concern is around the
journey time to Barnet which will take be	tween 1hour 9 minu	tes and 1hour 17minutes
[excluding delays] and will involve bus, t	ube and rail.	mobility
barrier of 60 minutes and	requested to be cor	nsidered for a move to
Kentish Town instead. It is expected tha	t such a move will be	e agreed and will entirely
mitigate negative impact		

We conclude that no members of staff with protected characteristics are significantly and disproportionately negatively impacted if this proposal goes ahead.

#### Impact on the public, external stakeholders or partners.

The public consultation paper, *Proposal for the future of Finchley Jobcentre*, was published on 30 January 2017. It invited comments from everyone with an interest in the future of Finchley jobcentre. Twelve responses were received of which four made reference to a protected characteristic [disability x 4 and gender X 1]. All highlighted issues around the additional travelling time and 6 also referred to the additional cost that would be incurred as a result of the transfer to Barnet.

#### Travel time

The impact of the additional time and distance that people will have to travel to reach Barnet Jobcentre. This is in particular reference to people with disabilities and people with young children and the effects this will have on their physical and mental health.

- The journey from Finchley Jobcentre to Barnet Jobcentre takes 23 minutes by tube.
- The longest bus journey from the area covered by Finchley Jobcentre to Barnet Court Jobcentre would take 40 minutes. The shortest bus journey would take 10 minutes. More detail on the journey times can be found in Appendix A.

DWP believes that it is reasonable to expect claimants to travel to an office within 3 miles, or 20 minutes by public transport from their existing jobcentre.

It should be noted that claimants, including those with vulnerabilities, are only asked to meet reasonable requirements. These take into account their individual circumstances, capability (including health conditions), disability and caring responsibilities.

DWP's work coaches personalise the support provided for each claimant based on individual need and circumstance. Where claimants have limitations due to a health condition or disability or because of caring responsibilities, then this is taken into account when arranging any attendance. DWP has various ways of interacting with vulnerable claimants, including:

- face-to-face
- by email
- by telephone
- by post
- by SMS

DWP recognises that some claimants will be taking an unfamiliar journey: work coaches will support claimants over the transition period until they become familiar with new travel arrangements.

The reimbursement of travel costs, other than mandatory attendance, is considered on an individual basis in line with DWP regulations nationally. This is not new and is the case for any claimant required to attend a jobcentre throughout the UK. Benefit recipients are expected to use their benefit payments to manage all of their budgetary needs. For Jobseeker's Allowance and Universal Credit claimants who are required to find work, this includes any costs in looking for work, or travelling to the jobcentre for their Initial Work Search Interview with a Work Coach and on their regular fortnightly day of attendance.

#### Travel costs

- The impact of the additional costs involved in travelling further to the new site
  and the extra burden that will place on people on very low incomes. Many
  claimants will face a more complex and more expensive journey to get to their
  Jobcentre and many will no longer have the option to walk to their nearest
  office and will have to use public transport by necessity rather than choice.
- The bus journey from the area covered by Finchley Jobcentre to Barnet
  Jobcentre would cost £1.50 for a single ticket. This would mean a total cost for
  the journey of £3.00. The cost for a bus day ticket is £4.50. The equivalent
  tube day ticket would cost £11.20
- Jobcentre Plus travel discount card (for those unemployed for 13 weeks and over) reduces the cost of travel by 50% on both bus and Tube. The cost of a typical bus ticket for a single journey would be 75p and the cost of a day bus pass would be £2.25 when in possession of this discount card.

 The cost of the Tube day ticket would be £5.60 per day when in possession of discount card.

#### Response and mitigations

DWP acknowledge that the proposals included in the consultation may increase travel costs for some claimants when they are required to attend a jobcentre. This will be particularly so for those who currently live within easy reach of their current jobcentre.

The reimbursement of travel costs, other than mandatory attendance, is considered on an individual basis in line with DWP regulations nationally. This is not new and is the case for any claimant required to attend a jobcentre throughout the UK.

Support to meet travel costs is also available to eligible claimants via the Jobcentre Plus Travel Discount Card. Claimants can also request to attend a jobcentre closer to their home, should there be one. Work coaches will help sign post claimants in such circumstances.

DWP recognise that some claimants will be taking an unfamiliar journey so work coaches will support them over the transition period until they become familiar with new travel arrangements.

Annex A provides additional detailed travel information for claimants travelling from the Finchley area to Barnet Jobcentre.

#### Access to services

DWP is not reducing its services and is committed to retaining an accessible jobcentre network. The proposal takes account of any increases in demand for its services and will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver a full service across all jobcentres.

The overall aim is to provide an enhanced service in Barnet Jobcentre. IT equipment will be moved and rehoused in the Barnet office. Claimants will continue to be encouraged to bring their own electronic devices into jobcentres to make good use of DWP's free Wi-Fi to help them manage their online claim and support their job search activities. Dedicated staff will be available to support claimants by delivering services and additional support in our digital suites. For those claimants who do not have access to IT equipment, the following centres offer free online access:

The excellent working relationships that are already in place with voluntary and partner organisations, and employers, will be maintained, with plans to build on these over the coming year.

DWP fully recognises the value of the developed relationship between claimants and work coaches and this will continue after services have moved. Unless there are

exceptional circumstances, a majority of claimants will retain their current work coach who will continue to deliver tailored and personalised support from the new jobcentre.

Flexible tailored support will continue to be offered to meet customer needs including the delivery of specific group sessions, co-delivered with employers and partners if appropriate, and tailored to offer maximum support. The proposals will ensure claimants have full access to employers via job fairs, recruitment events and, networking events that currently cannot take place in all offices due to space and resource constraints.

#### **Sanctions**

Concerns about public transport will continue to be considered on an individual basis. DWP does not expect these proposals to result in additional sanctions, as a direct result of the impact of travel journeys beyond the claimant's control. The number of sanction decisions for failure to attend, or failure to participate in a work coach interview without good cause, has fallen.

DWP recognise that some claimants will be taking an unfamiliar journey so work coaches will support them over the transition period until they become familiar with new travel arrangements.

#### **Outreach**

DWP is committed to retaining a jobcentre network and continuing to serve people in all areas of the UK to make sure they can continue to access the tailored services they need. When a full-time jobcentre closes, DWP will put an 'outreach' service in place within the local community.

Outreach is a vital front-facing service to claimants. Host organisations offer access to their facilities as part of the ongoing partnership activities with DWP. This allows work coaches and partner organisations to work together to support the joint needs of claimants.

DWP fully recognises the value of the developed relationship between claimant, work coaches and with partners. These will continue after services have moved to the Barnet Jobcentre. DWP will continue to provide work coach support on an outreach basis in the local Care Leaver hub. We will also continue providing outreach support for our Troubled Family group.

#### **Disability**

As outlined above the concerns expressed about the effect the increased travel time and costs will have on disabled claimants can be dealt with using existing procedures and mitigations. Claimants with the severest mobility issues are not required to attend as contact can be maintained via telephone or email. In cases where a site visit has been requested then taxi fares can be reimbursed.

Those disabled claimants that fall within the Work Related Activity Group have only 2 mandatory site interviews per year. Therefore the impact on this this group will be low due to infrequency of sites visits.

The Department therefore considers that any negative impact can be mitigated as part of business as usual at the Barnet building by applying existing policies and practices where a customer has difficulty attending the building. These policies and practices advance equality of opportunity by ensuring the disabled person can access the Department's service. For example the Department can consider whether personal attendance is necessary at all or if a home visit can be arranged.

#### <u>Gender</u>

For those with young children, lone parents with children under the age of one are not required at attend a work coach interview but may choose to do so on a voluntary basis and any contact can be conducted by telephone or email.

Lone parents whose youngest child is between the age of 1 and 3 are required to attend mandatory interviews every 6 months, but may choose to engage more frequently on a voluntary basis. Once the youngest child reaches the age of 4 the claimant is required to attend work coach interviews quarterly, again they may choose to engage with their work coach more frequently on a voluntary basis

A claimant whose youngest child is 5 and over will be the most impacted as they are required to sign on each fortnight and they themselves will have to bear additional costs involved of travel to the new site. Claimants are offered postal status when they have caring responsibilities and are unable to make arrangements for short-term care to cover their attendance, e.g., when caring for a child during school holidays, or they live more than one hour, door to door, in either direction, from the nearest Jobcentre by using public transport.

The Department considers that any negative impacts can be mitigated as part of business as usual at Barnet by applying existing policies and practices where a customer has difficulty attending the office. For example the Department can be flexible about appointment times to accommodate caring arrangements. There are policies and procedures in place which will help to mitigate against possible impacts which largely affect females.

#### **Conclusions**

Analysis of the equality information concerning the site does not indicate that the movement of staff will have impacts on those staff with protected characteristics. Should any issues arise, the Department considers that any negative impacts can be mitigated as part of business as usual at the office, by applying existing practices and policies.

This Equality Analysis has identified potential negative current impacts for persons with protected characteristics, specifically those of disability and gender.

The Department recognises that the increase in travel costs for claimants who have to attend fortnightly may well increase significant especially those that have formerly been able to access the Finchley site without the need for public transport.

Benefit recipients are expected to use their benefit payments to manage all of their budgetary needs. Concerns about public transport are an everyday issue and will continue to be considered on an individual basis. However, we recognise that some claimants will be taking an unfamiliar journey: work coaches will support claimants as appropriate over the transition period until they become familiar with new travel

arrangements. Claimants can also choose to attend a jobcentre that is closer to their home. Work coaches will help sign post claimants in such circumstances.

We cannot therefore conclude that claimants with protected characteristics, specifically that of disability and gender, have been significantly disadvantaged in comparison to other claimants without protected characteristics who will also sign on fortnightly and face the same increase in travel costs.

Where appropriate, mitigating action will be taken to remove, or significantly reduce, the negative impacts of any future changes on a business as usual basis.

# **Decision making**

This site level equality analysis will be considered by the Implementation Assurance Group as part of the final decision on the proposal. The decision, together with reasons, will be produced by IAG.

# Monitoring and review

As the Public Sector Equality duty is a continuing one, DWP will continue to monitor and review the impacts this proposal has had on individuals generally and those with protected characteristics. The impacts identified in this equality analysis and mitigations put in place will be monitored and reviewed at Barnet Jobcentre under existing policies and practices, as part of business as usual.

Ongoing monitoring should provide qualitative and quantitative evidence of the impacts that DWP may wish to subsequently address. It will also confirm whether the impacts anticipated in this equality analysis have been accurate, and may allow us to inform future decisions.

This EA will be further reviewed in the light of any additional evidence presented.

## Annex A - Travel times and costs

Travel Plans for Finchley N3 2BL [Ref 71195]

#### Import site Barnet EN5 1AQ

Jobcentre Plus travel discount card (for those unemployed for 13 weeks and over) which reduces the cost of travel by 50% on both bus and Tube. Typical daily bus pass single journey = 75p and daily bus pass = £2.25 when in possession of this discount card.

By London underground, it is 4 stops from Finchley Central to High Barnet. 9 minutes by tube, followed by 10 minutes walk.

The cost of travel by Tube is capped at £5.60 per day when in possession of discount card.

Postcode affected	Travel time to new site	Mode of travel	cost
N3	30/40min	Bus	£1.50
N2	15/20min	Bus	£1.50
N12	10min	Bus	£1.50

Travel information from the Finchley Jobcentre.