Site Level Equality Analysis for:

Highgate Jobcentre,

1A Elthorne Road,

London,

N19 4AL

Site reference: 23029

Date: 16 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 Department for Work and Pensions (DWP) announced new proposals on Wednesday, 26 January 2017 to relocate some of its Jobcentre Plus offices.

Jobcentre Plus operations have changed in recent years as people make more use of online and telephone services, generally only attending offices for appointments or for help in researching job vacancies.

The proposal is to divest London Highgate jobcentre (ref: 23029) and export all staff and service delivery into London Finsbury Park JCP, 52 - 53 Medina Road, London N7 7JX (ref: 71176) and London Barnsbury JCP, 1 Barnsbury Road, Islington, London, N1 0EX (ref: 71199).

The proposal will move approximately 57 staff to the following locations;-

- forty nine WSD to either Finsbury Park Jobcentre or Barnsbury Jobcentre,
- six FES to Hendon [Ref 1687]
- two DWP visiting to Wood Green [Ref 49916].

Guidelines around the movement of Jobcentres, referred to as 'ministerial criteria' has been used for many years across the whole of the UK network. They originated from a desire to standardise the circumstances when considering the movement of one job center to another.

DWP believe that it is reasonable to expect claimants to travel 3 miles or 20 minutes by public transport from their existing Jobcentre. Where it is proposed to move or close an office, and the move to a new Jobcentre is further than these criteria, DWP has the option to consult publicly about this proposal. Finsbury Park JCP is Within Ministerial Criteria; however, London Barnsbury JCP is Outside Ministerial Criteria - 3.1 miles, 26 minutes by public transport.

Travel distances and times:

Finsbury Park

distance: 1.4 miles

public transport: approximately 20 minutes

car: 9 minutes

Barnsbury

distance: 3.1 miles

public transport: approximately 26 minutes

car: 18 minutes

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Highgate to Hendon

N19 4AL to NW4 1DP

4.7 miles by road

17 minutes by car

26 minutes by public transport using the bus and London Underground (Northern Line)

(Source: Google maps)

Highgate to Wood Green

N19 4AL to N22 6UH

- 3.3 miles by road
- 18 minutes by car
- 31 minutes by public transport, No 41 bus service (including 0.8 mile walk) or
- 38 minutes by public transport using the bus and London Underground (Piccadilly line) including a 0.4 mile walk

(Source: Google maps)

The public consultation paper, *Proposal for the future of Highgate Jobcentre*, was published on 30 January 2017. It invited comments from everyone with an interest in the future of this jobcentre. This included the closure of the buildings with the services provided being transferred to another jobcentre within London.

Evidence and analysis

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

There were a total of eighteen responses; 2 from members of the public, 15 from claimants and one from the Member of Parliament for Islington North who's reply also included comments from local Highgate Public and Commercial Services Union representatives. The issues raised were as follows;-

- <u>Time</u>; Thirty-nine per cent of respondents expressed concerns about the increase in travel time to attend Finsbury Park or Barnsbury Jobcentres. Concerns cited included inconvenience, journey times on public transport and health issues. Typical comments:
 - "...would have to take no less than four buses in total to journey to either of the mentioned alternatives."
 - "...too far and inconvenient to get to..."
 - "...is an hour walk there and an hour walk back from my location..."
 - "...exhausting especially for those of us older claimants suffering from any health issues..."
- <u>Cost</u>; Thirty-three per cent of respondents expressed concern about the potential increase in travel costs and the effect this would have on disposable income, food and other necessities. Typical comments:
 - "...I would not have enough to pay the bus fares even with the reduced Oyster card....I walk so that I can have the extra little money to ensure I get some basic food to eat."
 - "The other locations would require public transportation to get to on a daily basis,

which I can't afford to do. I can't afford to pay £4.50 (daily bus fare) out of the £10.40 per day that I receive. Will this extra cost be compensated for?"

- "...when every penny counts, having to find extra for bus fares will be extremely difficult, even with a discounted travel card."
- Access to services; Eleven percent of respondents expressed concern about the
 adverse effect on the local community; of removing access to services; the ability of
 the new office to absorb the increased caseload and where the medical assessment
 centre will be moved to. Typical comments:
 - "...The other offices are already over subscribed and operate in a far less friendlier and supportive manner."
 - ".. these other job centres already have lots of people signing on, as does our centre, there would just be loads of queues all the time, more disgruntled people, more headaches and problems"
 - "There are concerns that the remaining jobcentres may struggle to deal with the increased footfall as the front of house staffing resource at remaining jobcentres has reduced over the years....It is important that jobcentres have an adequate office space to facilitate proper employment support services that meet the needs of jobseekers" [MP]
 - "...also houses a medical assessment centre and it is unclear where this service can be relocated to locally. There is a clear need for this to remain in the constituency..."[MP]
- <u>Sanctions</u>; Five per cent of respondents expressed concern that the number of sanctions issued would increase if the proposed jobcentre closures went ahead. The response received highlighted that longer more complex journeys by unreliable public transport, could lead to increased lateness or failure to attend appointments. Typical comment:
 - "... I would fear being sanctioned all the time by having to rely on the sometimes unreliable public transport, road works or traffic problems."
- <u>Vulnerability</u>; Five per cent of the respondents expressed concern over the effects of having to travel to another jobcentre. Typical comment:
 - "This will no doubt cause a huge emotional and psychological disturbance on the quality and continuity of job seeking support that I receive as an older user of the office...I may lose confidence.as I am getting older I get tired more easily with walking, walking to the relocated office will not be too bad but it is the walking back."
- Assessment of risk; Five per cent of the respondents expressed concern over the safety issue of attending the Finsbury Jobcentre. Typical comments:

- "...I had the unhealthy privilege of the Medina Rd branch for a year. Every time I visited, there was some kind of altercation."
- "...the current site is well positioned....and also I feel relatively safe within its current location especially in the winter dark months, it being close to a main road."

In terms of protected characteristics three claimants raised their concerns. One made reference to the move impacting older claimants with health issues, and the other two to the impact on older claimants.

One claimant said that a transfer to Barnsbury 'would actually suit me better as I have to travel quite far on the bus to get to the Highgate office at the moment."

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

	Ethnic Minority	White
Islington Council	31.83%	68.17%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Islington area is more than the national average. The 2011 census data for the Junction ward of Islington, where Highgate jobcentre is located, shows a wide range of ethnicities, include 15.5% 'White; Other White' persons. The data for main languages spoken reflect the ethnic mix o the ward. Outside of English, the next most common main languages are Turkish, Greek, Spanish, Italian, French, Portuguese and Arabic.

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 Finsbury Park or Barnsbury. This will be particularly so

for those who currently live within easy reach of Highgate.

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.

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
Islington Council	8.03%	7.63%	84.34%
National	8.5%	9.4%	82.00%

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

The percentage of the public in Islington area with a disability that limits day to day activities is lower than the national average, which minimally impacts the numbers of people with this protected characteristic that may be affected by this proposal. The data does not provide a breakdown of the types of disability or specific details on the type of impact that would be experienced.

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 Finsbury Park and Barnsbury offices are approximately 1.4 and 3.1 miles away from Highgate. 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.

One claimant raised their concerns stating; -

"I have to rely on public transport to get around, and travelling all the way to those remote locations every other week would be both expensive (bus or tube fares), exhausting - especially for those of us older claimants suffering from any health issues - and time-consuming."

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. The average additional

journey times can be found at Annex A

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; 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.

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. It can be argued that 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.

The Department considers that any negative impact can be mitigated as part of business as usual at the Finsbury Park and Barnsbury buildings 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.

The Department has also taken into account that some disabled customers will have needs in relation to accessibility (e.g. wheelchair users). The Finsbury Park and Barnsbury building is compliant with the requirements of the Equality Act 2010.

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 on-going partnership activities with DWP. This allows work coaches and partner organisations to work together to support the joint needs of claimants. DWP is currently working with our partner organisations within the local area to develop an outreach service.

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

	Male	Female
Islington Council	49.20%	50.80%

National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The percentages in the gender category for Islington are broadly similar to the national averages.

None of the 18 responses received to the public consultation covered gender or caring responsibilities. However, 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 considers that any negative impacts can be mitigated as part of business as usual at Finsbury Park or Barnsbury 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.

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 chose 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 chose 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 chose 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.

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 on-going partnership activities with DWP. This allows work coaches and partner organisations to work together to support the joint needs of claimants. DWP is currently working with our partner organisations within the local area to develop an outreach service.

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
Islington Council	2.29%	3.48%	13.17%	19.16%	36.99%	20.25%	4.66%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

The age ranges within the Islington area are broadly similar to the national averages. The main differences being in the 25-29 [+8%] and 45-59 [+9%].

Three claimants raised concerns and their comments were as follows;-

"..travelling all the way to those remote locations ...would be... exhausting - especially for those of us older claimants suffering from any health issues."

"This will no doubt cause a huge emotional and psychological disturbance on the quality and continuity of job seeking support that i ...receive as an older user of the office ... i am getting older i get tired more easily with walking...."

"there are many older people living in this area, who will not find the extra travel easy."

Mitigation

The Department considers that any negative impacts can be mitigated as part of business as usual at the Finsbury Park and Barnsbury Jobcentre's, 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 attend

Finsbury Park or Barnsbury Jobcentre's. This will be particularly so for those who currently live within easy reach of Highgate 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.

There is no evidence to suggest that the proposal would have a disproportionate negative impact on any age grouping, or affect the other aims of the equality duty in relation to this protected characteristic.

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
Islington Council	40.21%	1.03%	1.02%	0.93%	9.47%	0.28%	0.47%	30.04%	16.56%
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 averages, no issues have been identified as regards this protected characteristic.

Other protected characteristics

None

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

No data is collected on these protected characteristics. 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. There may be a need for additional room for confidential conversation; DWP will provide this provision for this possibility.

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

Potential impact on members of staff

Summary of one to one conversations

One to one discussions have been held with all fifty seven Members of Staff at the Highgate office.

There are forty nine Work Services Members of Staff to be re-located to either Finsbury Park or Barnsbury. The six FES Members of Staff will divest to Hendon [Ref 1687] and two DWP visiting Members of Staff who will divest to Wood Green [Ref 49916].

Circumstances identified by Members of Staff that could have an impact on their mobility were as follows:-

- child and caring responsibilities, additional travel costs if travelling into Zone
 One [even when factoring in EFA], no car parking, and request to work closer to home
- mobility issues and public transport complex journeys
- DWP Visiting = parking at other sites and transport links for visiting purposes.
- staff have indicated they would require a reasonable adjustment related to mobility.

All of the proposed sites are on a bus route and have both tube and rail links.

As more than one future site is proposed the following 51 Members of Staff have indicated which site they would agree to re-locate to; -

- Finsbury Park 34
- o Barnsbury 12
- o Other 5

Forty nine [85.96%] are within mobility and have agreed to re-locate. Four FES Members of Staff have identified other offices within reasonable daily travel which, should a job opportunity arise, they would be willing to travel to (i.e. Finsbury Park [1]; Camden NINo Hub [2]; Kentish Town Jobcentre [2].)

are outside mobility and have refused to re-locate and have named alternative offices. One is outside mobility but content to move to proposed site.

members of staff may require reasonable adjustments.

Twenty five Members of Staff are likely to qualify for excess fares.

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 and asked to confirm the potential impact of the proposals on their staff.

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

	Ethnic Minority	White	Unknown
Highgate	32.81%	21.88%	45.31%
All DWP	8.97%	65.17%	25.86%

Source: Resource Management, December 2016

The percentage of ethnic minorities in the Highgate office is higher than the DWP average, although there is a very large percentage of "unknowns" so the variation is not completely certain.

No issues in this category have been raised in the course of the staff one-to-one meetings 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.

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

	Disabled	Non-Disabled	Unknown
Highgate	6.25%	68.75%	25.00%
All DWP	5.63%	73.06%	21.31%

Source: Resource Management, December 2016

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

In total	have identified health issues that could impact their
mobility:-	

At this stage the DWP has not commenced the process of identifying reasonable adjustments for this individual The DWP will endeavour to take reasonable steps to mitigate the impact of the move on this individual. However it is not possible at this time to determine what that mitigation may be or whether the matter will be resolved successfully.

FES:

WSD:

are outside mobility and have identified alternative sites they would be willing to move to. At this stage the DWP has not commenced the process of finding out whether it is possible to accommodate their requests to be redeployed to these alternative sites. The DWP will endeavour to take reasonable steps to facilitate the redeployment but at this stage there are no guarantees that this will be possible. The DWP will endeavour to take reasonable steps to mitigate the impact of the move on this individual.

They have advised they are content to move to

which is within
reasonable travelling distance

At this stage the DWP has not
commenced the process of finding out whether it is possible to accommodate the request
to be redeployed to these alternative sites. The DWP will endeavour to take reasonable

is outside mobility but content to

steps to facilitate the redeployment but at this stage there are no guarantees that this will be possible. The DWP will endeavour to take reasonable steps to mitigate the impact of

These individuals will therefore be impacted by the relocation to Finsbury, Barnsbury, Woodgreen or Hendon.

No issues have been raised in one-to-one meetings with staff around building access which may impact staff with a disability.

Management are obtaining guidance on the next steps and will engage in further 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 as required. 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.

The Department is currently consulting individuals and will take reasonable steps to accommodate their requirements and mitigate the potential negative impacts which have been identified. At this stage, the outcome of this consultation cannot be confirmed, though the Department remains committed to taking all reasonable steps in order to accommodate individual needs arising from the proposal.

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

	Male	Female
Highgate	34.38%	65.62%
All DWP	32.18%	67.82%

Source: Resource Management, December 2016

the move on this individual.

Highgate has a lower percentage 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.

Members of Staff have highlighted issues relating to caring responsibilities,
Caring responsibilities sited include childcare
elderly parents or unwell spouses meaning staff are restricted on their travel time

Management has indicated they are obtaining guidance before taking next steps and will offer further 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.

The Department is currently consulting individuals and will take reasonable steps to accommodate their requirements and mitigate the potential negative impacts which have been identified. At this stage, the outcome of this consultation cannot be confirmed, though the Department remains committed to taking all reasonable steps in order to accommodate individual needs arising from the proposal.

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 may be a need for rooms to be available for confidential conversations; DWP will provide this provision as required. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not.

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+
Highgate	1.56%	12.50%	26.56%	39.06%	20.31%	0.00
All DWP	2.92%	11.20%	22.39%	38.19%	23.83%	1.47%

Source: Resource Management, December 2016

and distances.

The age distribution shows a slight variation against the DWP averages for these age groups. However, 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 [office name]. 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 may be a need for rooms to be available for confidential conversations; DWP will provide this provision as required. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not.

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

one-to-one discussions

have been held

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 (although the considerations on child and caring responsibilities above will apply to them on their return to work). 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.

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
Highgate	78.13%	21.87%
All DWP	59.74%	40.26%

Source: Resource Management December 2016

The Highgate 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. There is no anticipated impact on staff members, either in respect of those who share this protected characteristic or those who do not

Summary of equality impacts

Background

The proposal is that London Highgate JCP, [1A Elthorne Road, Highgate Hill, London, N19 4AL (ref: 23029)] export service delivery into London Finsbury Park JCP, [52 - 53 Medina Road, London N7 7JX (ref: 71176)] and London Barnsbury JCP, [1 Barnsbury Road, Islington, London, N1 0EX (ref: 71199)].

A total of fifty seven Members of Staff will move; -

- 49 Jobcentre staff will be divided equally between London Finsbury Park JCP and London Barnsbury JCP;
- 6 FES Members of Staff will move to Hendon [Ref 1687]
- 2 visiting Members of Staff will divest to Wood Green [Ref 49916].

Impact on staff located at Highgate

One to one discussions have been held with all fifty seven Members of Staff at the Highgate office. Twenty identified personal circumstances that could impact on their mobility.

 Sixteen highlighted personal issues that could impact their mobility; including caring responsibilities and travel issues in relation to times and distances.
Forty Nine [85.96%] are within mobility and have agreed to relocate.
named suitable alternative sites.
content to move to their proposed site
To act of a March and Confirmal Phalace and

Twenty five Members of Staff are likely to qualify for excess fares

The Department is currently consulting individuals and will take reasonable steps to accommodate their requirements and mitigate the potential negative impacts which have been identified. At this stage, the outcome of this consultation cannot be confirmed, though the Department remains committed to taking all reasonable steps in order to accommodate individual needs arising from the proposal.

Impact on Public, external stakeholders or partners

<u>Travel Time</u>; 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. Through consultation, the catchment area of each jobcentre has been investigated and the specific travel times and bus routes have been compiled at Annex A

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 recognise 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. Claimants can also request to attend a jobcentre that is closer to their home. Work coaches will help sign post claimants in such circumstances. See annex A for more detailed travel times

<u>Travel Costs</u>; 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. See annex A for more detailed travel costs

<u>Access to services</u>; DWP is not reducing its services and is committed to retaining a jobcentre network in London. The offices proposed for closure will deliver economies of scale, which will enable DWP to deliver enhanced services to support business improvements including digital services, group information support and access to a wider spectrum of partners and employers.

The overall aim is to provide an enhanced service in Finsbury Park and Barnsbury: IT equipment will be moved and rehoused there. 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 the digital suites.

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 current proposal is to relocate the Highgate Medical Centre onto the first floor of the Wood Green Jobcentre in a like for like move.

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.

DWP is confident that the additional workload can be accommodated into the new jobcentre with the capacity to expand as necessary. Working practices and service delivery methods will continue to be reviewed and adapted to maximise the use of the estate.

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, claimants will retain their current work coach who will continue to deliver tailored and personalised support from the Finsbury and Barnsbury Jobcentres.

<u>Sanctions</u>; The National Audit Office has estimated that a million jobseekers missed appointments between July 2015 and December 2015 compared with only 34,000 sanction referrals. This reduction is specifically due to the ongoing work to ensure claimants know and understand expectations with their work coaches.

DWP does not expect these proposals to result in additional sanctions. The number of sanction decisions for failure to attend, or failure to participate in a work coach interview without good cause, has fallen.

Concern about public transport will continue to be considered on an individual basis. DWP does not expect these proposals to result in additional sanctions.

DWP recognise 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.

<u>Vulnerability</u>: 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.

Assessment of Risk; Any potential Health and Safety-related incidents at Finsbury Park are prevented or mitigated by a fully-staffed and trained Front of House team, an experienced and fully-staffed team of Customer Care Officers, a strong relationship with local police and a whole office familiarity with the Local Incident Management Plan.

Finsbury Park is very close to the major Seven Sisters Road and bus stops and tube station; and Barnsbury is opposite the main borough police station and a busy road and market place.

Conclusion

The majority of staff [87.71%] have agreed to relocate to their particular divestment site, 49 of them are within mobility and 1 out with.

One claimant said that a transfer to Barnsbury would suit them better.

DWP has been mindful of its duties under the Equality Act 2010. Careful consideration has been given to the wider effect on the local communities. DWP will maintain services to claimants, whether in their existing jobcentre where a decision is made to retain that office or, where their existing jobcentre will close, at an alternative site. DWP recognises that these proposals represent a major change that will have a greater impact on some groups with protected characteristics than others, as evidenced by the consultation responses and Equality Analysis appended to this report.

The department has had due regard to the impact of the proposals throughout programme development, as evidenced by the high level equality analysis that was undertaken before the proposals were finalised and by the consultation and full Equality Analysis that has just been undertaken.

The site level consultation has enabled the department to carry out detailed analysis to enable us to understand how any proposal might impact at a local level, test whether it is the right solution in the circumstances and consider possible mitigations.

This Equality Analysis has identified potential negative current impacts for persons with protected characteristics, specifically that of gender, and age, who are signing on fortnightly which the Department is currently unable to mitigate.

The net increase in travel costs for these claimants who have to attend fortnightly may well be significant especially those that have formerly been able to access the Highgate site without the need for public transport. Most former Highgate claimants will see an increase in travel time irrespective of where they currently live.

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.

We cannot therefore conclude that claimants with protected characteristics, specifically that of Gender, or Age 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 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 costs and times

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. Through consultation, the catchment area of each jobcentre has been investigated and the specific travel times and bus routes have been compiled.

Various buses travel from Highgate to Barnsbury or Finsbury Park either directly or to nearby stops. The tube or train are also available.

<u>Finsbury</u> – Distance from Highgate is 1.1 miles. Journey is a combination of tube/bus taking 34 minutes. Tube part of the fare is £1.70 peak & £1.50 off peak and the bus part is £1.50.

Buses to Finsbury Park are 43, 263, 271, 91 then change to 29, 253, 254, 259 if choose to or direct bus 210.

<u>Barnsbury</u> – Distance from Highgate is 2.8 miles. Tube takes 30 minutes and costs £3.30 peak & £2.80 off peak (this fare is dearer as is crosses London fare zones). Bus takes 44 minutes and would be £1.50.

Buses to Barnsbury are 43, 263, 271, 91 then change to 153 if choose to or continue on 43 and

<u>Hendon</u> – Distance from Highgate is 5 miles. Journey is a combination of tube and bus taking 42 minutes. Tube part of fare is £1.70 peak and £1.50 off peak with bus part being an additional £1.50. Bus only journey takes 57 minutes and would cost £1.50

Postcode affected	Travel time to new site	Mode of travel	cost
Highgate N19 4AL	20 minutes	Bus	£1.50
to			(for 2
Finsbury N7 7JX			buses
			used
			within 1
			hour)
Highgate N19 4AL	30 minutes	Bus	£1.50
to			(for 2
Barnsbury N1 0EX			buses
			used
			within 1
			hour)