

Site Level Equality Analysis for Leytonstone Jobcentre, 1-3 Lemna Road, London E11 1JJ

Site reference: 02396

Date: 22.04.17

Completed by: [REDACTED]

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.

Site Level Equality Analysis

Version 19.05.2016

Brief outline of the proposal

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

The proposal is to divest Leytonstone Robart House, relocating staff and services to Walthamstow Westbury (site reference 71266). Approximately 44 front of house OED and WSD staff (December 2017 staff in post figure) will relocate from Leytonstone to Walthamstow Westbury. Site 13365 Walthamstow Dansom House is also being divested and merging staff and services into Walthamstow Westbury as part of this group proposal.

The difference between offices is 3.7 miles, public transport 36 minutes, car/cycle 18 minutes. This proposed move is outside of the Ministerial Criteria, and the proposal has been subject to a public consultation.

The remaining OED and FES staff (approx. 13 in total) will relocate to Redbridge (site reference 99687), at a distance of 5.3 miles from Leytonstone.

Evidence and analysis

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

A public consultation was carried out concerning the proposal. In response to the public consultation exercise, 57 responses were received. 49 were from individuals or members of the public, 7 were from organisations and 1 response from an MP. Of these responses, 22 replies were from actual customers of Leytonstone Jobcentre. One of these responses is regarding a petition in response to the proposal, which has 244 signatures and a further 51 comments.

31 responses mentioned protected characteristics: 29 responses mentioned disability; 19 mentioned gender; 3 mentioned age; and one response covered race/ethnicity.

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

	Ethnic Minority	White
Waltham Forest	47.80%	52.20%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Waltham Forest area is considerably higher than the national average.

One response to the public consultation, from a Member of Parliament, covered this protected characteristic: “The staff are overwhelmingly BME or female or both and many customers do not have English as a first language and therefore struggle to use public transport.”

No further evidence or responses have 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 Walthamstow, Westbury JC. This will be particularly so for those who currently live within easy reach of Leytonstone JC.

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
Waltham Forest	6.93%	7.65%	85.43%
National	8.5%	9.4%	82%

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

The percentage of the public in Waltham Forest with a disability that limits day to day activities is slightly lower than the national average, which slightly decreases 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.

Following a public consultation the Department received 57 submissions on the impact on the disabled from MPs, Local Councillors, local partnerships, voluntary organisations, and members of the public. Of the 49 submissions that came directly from members of the public 22 individuals actually used the Leytonstone Office.

Points raised include:

- Those with mental health issues find it difficult to travel by public transport. There are real anxieties and concerns that these anticipated travel difficulties will result in people facing more sanctions as a result of being later for or missing appointments at the Jobcentre.
- John Cryer MP – ‘Leytonstone is already working well and is being used for its usual functions as well as training for staff. It has a lift and is disabled accessible unlike the Walthamstow branch. They already find attending a struggle, however it is relatively conveniently located for those with mobility issues (cars, mobility scooters, and the tube)
- A claimant has pointed out that by DWP’s own criteria, claimants should not have to travel more than 20 minutes by public transport to their local Job Centre. If the proposed closures go ahead, it is claimed these criteria will not be met, with claimants having to travel at least 36 minutes by public transport. With the unreliability of public transport, it is highly likely that journey times will take even longer than the proposed estimates given in the consultation paper and consequently, claimants will be late for appointments. The increased levels of anxiety and stress are likely to have a hugely adverse impact on the emotional well-being and mental health of disabled claimants themselves, with subsequent knock-on effects on family members.

Quote from claimant - ‘Roughly a 50 minute walk for me, and that’s just one way so in effect it would mean walking for 1 hour and 40 minutes as a return journey. This would not be realistic for me as I take medication for arthritis but I believe it is an excessive amount of walking to expect even a normal individual to do. Therefore, if this proposal were to go ahead then I think people living more than a 30 minute walk away should have their travel paid for (cheapest method)’

- Leyton and Wanstead Constituency Labour Party/Waltham Forest Trade’s Council
We believe this would have a significant impact on certain categories of users - such as those with disabilities or with young children.

Travel costs and risk of sanctions.

We understand, for example, that there is no public lift at the Walthamstow office and that there are no car parking facilities. Again, these are important issues in respect of certain categories of claimant.

Question whether the Walthamstow office has the capacity to bear the significantly increased number of claimants using the office. It is our understanding that it has already been the case that the office has been unable to cope with the numbers using it and, therefore, claimants have been asked to use the office in Forest Road.

- The objections raised can be broken down into 6 main categories
 - The additional time and distance that the disabled will have to endure to reach the new anchor site and the difficulty of accessing suitable transport this will have on their physical and mental health.
 - 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. Many will also no longer have the option to walk to their nearest office and will have to use public transport by necessity rather than choice.
 - The fears that sanctions will be applied if appointments are missed because of the greater distance involved, an unreliable bus service, especially during periods of severe weather, and buses suitably adapted to take more than one wheelchair user at a time.
 - Concerns that the same level of service will not be available at the new site with longer waiting times and fewer staff available to meet demand.
 - Access to lift at new site.
 - Free car park availability

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 Walthamstow Westbury is approximately 3.7 miles away. It is recognised that the 3.7 miles 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.

The Department considers that any negative impact can be mitigated as part of business as usual at Walthamstow Westbury 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.

DWP must make suitable provision to communicate with claimants and customers who are deaf, hard of hearing or speech impaired. Telephone interpreters are provided by *thebigword*. Face to face interpretation using the contracted supplier, *Prestige*, is also available for interviews that require British Sign Language or non-spoken languages.

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

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

	Male	Female
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Waltham Forest	49.49%	50.06%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The gender balance in Leytonstone is very close to the national average.

A total of 19 direct respondees to the public consultation mention impacts related to gender, plus further responses in the petition. For example, a petitioner wrote “We need a local office especially for elderly disabled, women who are suffering domestic violence and other office may not be suitable due to their situation. Single parents with very young children find it hard to travel further with kids under 5s on public transport and get back in time to pick their other children from school”

The PCS Union wrote: “JCPs are increasingly seeing customers with disabilities and young children. A customer on ESA handing in a medical certificate may struggle to travel further and spend more time on a bus to Walthamstow JCP. A customer with children at school may have increased difficulty attending appointments at the JCP and taking/collecting their children from school. Increased time and distance to Walthamstow JCP may deter such customers on ESA and IS attending voluntary appointments.”

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 Walthamstow 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 to 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.

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
Waltham Forest	3.51%	3.35%	11.60%	14.93%	36.90%	24.20%	5.51%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

Various respondents to the public consultation (and the petition) raised the potential impact that this proposal would have on young people and older people, For example,

“My daughter now has work but, when she was struggling, Leytonstone Jobcentre was essential. It's simply too far and too expensive for young unemployed people to get to Walthamstow.”

“I used to be a resident of the area. Speaking from personal experience without services like these a young person is lost without help in the search for employment. Instead of closing these, improve them.”

“Closing Leytonstone jobcentre is an attack against the poor, the old, the sick, and the vulnerable.”

Despite these comments, there is no clear evidence to suggest that the proposal would have a disproportionate negative impact on any age grouping. The Department considers that any negative impacts can be mitigated as part of business as usual at the Walthamstow office, 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 Walthamstow jobcentre. This will be particularly so for those who currently live within easy reach of Leytonstone 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
Waltham Forest	48.38%	0.77%	2.29%	0.49%	21.89%	0.47%	0.38%	17.99%	7.33%
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)

The statistics for religions and beliefs reflect the wide ethnic mix of Waltham Forest, with greater percentages of Hindu, Jewish, Sikh, Buddhist and Muslim people than the national average.

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

Other protected characteristics

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

No evidence has been presented 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 conversations have been carried out for all 57 staff (43 WSD, 10 OED and 4 FES) employed at the office. There were no major impacts identified although a number of issues were raised by a high proportion of staff.

WSD – Childcare issues, Length of journey/travel time, Part time staff and impact on health – unable to use public transport (currently uses car), Relocating home to Basildon, Prefer not to work close to office they live close to

OED - Additional travelling time, Impact on caring responsibilities

FES –Caring responsibilities, Length of journey, Lack of parking

10 members of staff agreed to move to Redbridge. 20 other members of staff indicated they would prefer to move to sites that are not in the design [REDACTED]

[REDACTED]. Other members of staff did not indicate a preference.

17 members of staff have identified personal circumstances that could impact on mobility because of health.

There are a number of staff who would require reasonable adjustments relating to mobility including:

8 people need specialist/adapted equipment to be taken with them – this will be organised by site management

■ Blue badge holders – These requirements are being dealt with in on-going discussions between management and members of staff concerned. Consideration to be given to Walthamstow, Dansom House (13365) also divesting and merging staff into Walthamstow, Westbury (61 FTE), which could add to potential parking allocations.

Desk raised – organised by site management

Special chair and lights near windows – To be organised by site management once move agreed

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.

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

	Ethnic Minority	White	Unknown
Leytonstone	50.94%	9.43%	39.62%
All DWP	8.86%	68.11%	23.03%

Source: Resource Management December 2016

The percentage of ethnic minorities in London Leytonstone office is higher than the DWP average, and there is a 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.

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

	Disabled	Non-Disabled	Unknown
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Leytonstone	7.55%	66.04%	26.42%
All DWP	5.83%	78.4%	15.77%

Source: Resource Management December 2016

The percentage of staff with a disability in London, Leytonstone would appear to be above the DWP average, although there is also 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.

██████████ staff have blue badges and have allocated parking at Leytonstone. Local policy to be set for car park space entitlement. If office is unable to accommodate, conversations have been held with CSOM and parking can be arranged to park in street as blue badge permits.

Consideration to be given to Walthamstow, Dansom House also divesting and merging staff into Walthamstow, Westbury (61 FTE), which could add to potential parking issues.

██████████ has identified ‘personal circumstances’ that could impact on mobility. ██████████ staff has a health issue which falls within the protected characteristics and ██████████ unable to travel long distances or by public transport. No decisions have yet been made as the future location for OED staff in London is still being considered.

Access to work case has been identified through 121 process, this will continue at new location.

8 members of staff have specialist equipment and these will be required to be moved to the new office as a reasonable adjustment. No arrangements have been made to move the equipment as no date set for the move. Discussions with local management will continue.

6 members of staff fall within the protected characteristics under the Equality Act. Discussions have taken place to discuss reasonable adjustments and individuals have requested to move to another office nearer to their homes.

Both Walthamstow and Redbridge are both compliant with the requirements of the Equality Act 2010. For other issues which have been identified, the Department considers that any negative impacts can be mitigated as part of the business as usual at the office, by applying existing practices and policies, e.g. adapted equipment moves, seating location and access to work.

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

	Male	Female
Leytonstone	45.28%	54.72%
All DWP	31%	69%

Source: Resource Management December 2016

London Leytonstone has a slightly lower level to the average 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.

Some concerns have been raised during the 121 process (five cases - 4 childcare and 1 carer) however 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. Eg. Flexible working patterns.

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

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.

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+
Leyton-stone	0%	5.66%	24.53%	43.40%	26.42%	0%
All DWP	1.3%	10.5%	22.7%	39.9%	23.8%	1.8%

Source: Resource Management December 2016

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 Walthamstow (3.9 miles) and Redbridge (5.3 miles)

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.

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.

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.

No staff have been identified 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
Leytonstone	71.70%	28.30%
All DWP	57%	43%

Source: Resource Management December 2016

London, Leytonstone 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

The proposal is to divest Leytonstone Robart House, relocating staff and services to Walthamstow Westbury.

Impacts on the public

A number of issues have been raised in the course of the public consultation, which affect those people with the protected characteristics of ethnicity, disability, gender and age. A core issue which cuts across all claimants is the extra costs and travel time for service users to attend the Walthamstow office.

The effect the increased travel time and costs will have on disabled claimants can be dealt with using existing procedures and mitigations. Those claimants with the severest mobility issues need never visit the office, as home visits or the use of the telephone or email will suffice. 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 two mandatory site interviews per year. Therefore it is estimated that the impact on this group will be low due to infrequency of sites visits.

Several respondents have highlighted that Walthamstow JCP is less accessible for residents with disability or restricted mobility than Leytonstone JCP (notably the lack of public lift). However Walthamstow Westbury is compliant with the requirements of the Equality Act 2010 and required services must be accessible to customers without using a lift, if not available.

Regarding gender and caring responsibilities, single parents with children ages between 1 and 4 have only two mandatory site interviews per year. The impact on this group is expected to be low due to infrequency of sites visits.

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.

Comments received have suggested an impact on younger people, and the effect the longer journey will have on older people using the services at Walthamstow. Younger claimants are most likely to be the most impacted by the changes as they are required to sign on each fortnight and they themselves will have to bear additional costs involved of travel to the new or alternate site.

While ethnicity has only been raised by one respondent, the wide ethnic mix in Leytonstone is noted. Where language potentially presents a barrier, DWP has policies in place to mitigate; 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 Walthamstow, Westbury JC. This will be particularly so for those who currently live within easy reach of Leytonstone JC. 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.

Impacts on the staff

A number of issues have been raised in the course of the 121 conversations, largely relating to disability (mobility issues, accessibility and specialist equipment) and caring responsibilities.

The Department considers that any negative impacts can be mitigated as part of business as usual at the Walthamstow and Redbridge offices, by applying existing practices and policies, e.g. Flexible working patterns.

Conclusion

The analysis of the proposal has identified some potential negative impacts for persons with protected characteristics, particularly disability and gender. There will be a net increase in travel costs for claimants who have to attend fortnightly, especially for those that have formerly been able to access the Leytonstone jobcentre without the need for public transport.

However, because of available mitigating actions they will not be significantly and disproportionately disadvantaged in comparison to other claimants without any protected characteristics who also sign on fortnightly. All 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 for a 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 Walthamstow Westbury and Redbridge 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.