

Site Level Equality Analysis for: London Wembley Olympic House, 1 Olympic Way, HA9 0DL Site reference: 8722

Date: 16/05/2017

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.

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 Wembley Olympic House (8722) and export staff and service delivery to Watford Exchange House (5772). Olympic House also houses a back of house CHDA team. The CHDA team is no longer included in the current move. They will be dealt with in a separate EA once the destination for their move is known. A total of 176 DWP staff will relocate to Watford and a further 6 FES staff will relocate to St Albans.

Watford Exchange House is 17 miles from Wembley Olympic House, 28 minutes by car and 53 minutes using the Underground. (Source: Google maps.)

Beauver House, 6 Bricket Road, St Albans, AL1 3JU, is 21.6 miles from Wembley Olympic House, 47 minutes by car or 51 minutes on public transport (using the Underground Jubilee line and a Thameslink train).

Evidence and analysis

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

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

	Ethnic Minority	White
Brent	63.73%	36.27%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Brent area is significantly more than the national average. However Wembley Olympic House is not a public facing office. There is no anticipated impact on members of the public, 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

	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited
Brent	6.96%	7.46%	85.58%
National	8.5%	9.4%	82.00%

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

The percentage of the public in this area with a disability that limits day to day activities slightly lower than the national average. However Wembley Olympic House is not a public facing office. There is no anticipated impact on members of the public, either in respect of those who share this protected characteristic or those who do not.

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

	Male	Female
Brent	50.28%	49.72%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The gender percentage of the public in this area is similar to the national average. Wembley Olympic House is not a public facing office. There is no anticipated impact on members of the public, 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

	16-17	18-19	20-24	25-29	30-44	45-59	60-64
Brent	3.53%	3.36%	11.21%	16.08%	35.35%	24.78%	5.69%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

Wembley Olympic House is not a public facing office. There is no anticipated impact on members of the public, 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 dealt with

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion	Religion not stated
Brent	41.48%	1.38%	17.82%	1.40%	18.65%	0.55%	1.21%	10.62%	6.90%
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. Wembley Olympic House is not a public facing

office. There is no anticipated impact on members of the public, either in respect of those who share this protected characteristic or those who do not.

Other protected characteristics

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.

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

At the time of completing the 1-2-1 conversations all but 1 member of staff currently working in Wembley Olympic House have had 1-2-1 discussions. The 1 member of staff who hadn't completed 1-2-1 [REDACTED]

The length and complexity of the journey and the walking distance from the transport points is a general cause for concern. Watford is located between 13-24 minute walk from stations, as opposed to Wembley which is 2-minutes from tube with multiple lines, resulting in many concerns over the time and distance to reach the office from transport termination points.

The other methods of public transport available are:

- Watford High Street Station is 13-minute walk away
- Watford Junction Station is 13-minute walk away
- Watford Underground Station is 24-minute walk away

Bus Stop outside of building for routes – 318, 336, 352, 500, 501, 951, R8, W30, X336, R2 and W18

In total,

- 64 members of staff are within mobility and agree to relocate.
- 8 members of staff are within mobility and refuse to relocate.

- 41 members of staff are outside mobility and agree to relocate.
- 58 members of staff are outside mobility and refuse to relocate.
- 60 members of staff have identified personal circumstances that could impact on mobility

Breakdown of responses by work area:

BSD – DRT & SF

- **Travel**
 - Outside mobility rules – Limited tube lines in to Watford and stations a further 15-minutes' walk or a bus ride away. Many would consider driving if travel time was available/payable as part of excess fares
 - Limited mobility – walking distance from all three stations, several members of staff with health conditions preventing/inhibiting walking distances
 - Limited parking – cost of parking, many people can save time travelling by car but fear expense as parking unlikely to be covered by excess fares, many more will be willing to relocate if parking is available and paid for by department
 - Personal Health & Safety affecting walking ability – impacted by finishing times of 18:30/20:00 and member of staff reluctance to be walking/waiting for buses in dark
- **Caring responsibilities** – age profile of staff may be reason for many having caring responsibilities for children and/or elderly relatives
- **Financial impact** – going from inner to outer London. While zones mostly align from 2019, many members of staff were expecting pay rises in 2018 and signed up to Employee Deal on this basis. They are likely to move to mark time if relocating to Watford.
- **Health Issues** – several staff cite on going health issues for themselves that make the longer journey expected too challenging and/or impractical. Also cases of people needing treatment at locations near current site/home
- **Retirement** – some staff are planning to retire rather than move office

OED

- Staff said a move will impact salary and would like some clarification. No problem travelling but a move before 2018 pay rise would impact pension
- Outside mobility rules

- Negative impact on salary
- Part time shared caring responsibilities
- Unable to travel to relocation site of Watford

WSD

- Members of staff very flexible about travel to locations, but needs to have a permanent base within mobility for health reasons

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 will also have been asked to confirm any potential impact on their staff.

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

	Ethnic Minority	White	Unknown
Wembley Olympic House	71.13%	14.23%	14.65%
All DWP	8.97%	65.17%	25.86%

Source: Resource Management, December 2016

The percentage of ethnic minorities in Wembley Olympic House is significantly higher than the DWP average, although 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 or from elsewhere.

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

	Disabled	Non-Disabled	Unknown
Wembley Olympic House	5.02%	90.79%	4.18%
All DWP	5.63%	73.06%	21.31%

Source: Resource Management, December 2016

The percentage of staff in Wembley Olympic House with a disability would appear to be slightly below 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.

■ people, covered under the Disability Discrimination Act, have concerns about the

distance to walk and how it would impact on their existing health conditions.

No other issues have been identified. 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
Wembley Olympic House	19.25%	80.75%
All DWP	32.18%	67.82%

Source: Resource Management, December 2016

Wembley Olympic House has a higher 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.

A number of staff have raised caring responsibilities as a concern.

- Concerns regarding school pick-up/drop of times and their responsibility/challenge of meeting the Employee Deal demand with the increased journey times if moves go ahead.
- Some had children with health issues that needed additional caring time/effort and required them to remain closer to home/school.
- Some had elderly relatives they considered themselves to be the prime carer for. This roughly split 50/50 between those who detailed care activities and those who said they needed to remain close in case of emergency.

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. However, if a staff member is able to accept role, but only on reduced hours, there will still be a negative impact for them.

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+
Wembley Olympic House	0.0%	0.42%	14.64%	46.03%	30.96%	7.95%
All DWP	2.92 %	11.20%	22.39%	38.19%	23.83%	1.47%

Source: Resource Management, December 2016

The age distribution shows a variation against the DWP averages for these age groups. It is not anticipated that staff would be disproportionately impacted because of their age as a result of the office move, however some members of staff have said they are planning to retire rather than move office.

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 religion and beliefs of 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
Wembley Olympic House	52.30%	47.70%
All DWP	59.74%	40.26%

Source: Resource Management December 2016

The Wembley office has a higher 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 Wembley Olympic House (8722) and export staff and service delivery to Watford Exchange House (5772). A total of 176 DWP staff will relocate to Watford and a further 6 staff will relocate to St Albans.

There is no anticipated impact on members of the public, either in respect of those who share any of the protected characteristics or those who do not.

Olympic House also houses a back of house CHDA team. The CHDA team is no longer included in the current move. They will be dealt with in a separate EA once the destination for their move is known

Concerns have been raised by staff on a number of topics including Health & Safety and staff covered by the Disability and Discrimination Act in relation to the time and distance to travel to the office from public transport points. Also concerns around caring responsibilities including dropping and picking up children with increased journey times and Employee Deal responsibilities.

Of particular concern are the 58 members of staff who are outside mobility and refuse to relocate and the 60 members of staff who have identified personal circumstances that could impact on mobility. Because of the additional travel time and costs for many members of staff, and the increased distance from public transport links to the office in Watford, we have identified potential negative impacts on staff with the protected characteristics of gender (for caring responsibilities) and disability. Discussions with staff regarding caring responsibilities, health issues and the travelling to the new office will be on-going to help mitigate the concerns raised.

- Should any redeployment opportunities be identified outside normal mobility, then the staff with the protected characteristics of gender and disability could be disproportionately impacted in the event that as a result of their protected characteristic they have greater difficulties in accepting redeployment opportunities as an alternative to redundancy.
- DWP has robust policies in place for those with protected characteristics (such as reasonable adjustments) and these will be considered in all cases where redeployment may be required for those displaced by People and Locations Programme.
- DWP Workforce Management and OPP are currently identifying redeployment opportunities in the area both within DWP and in OGDs and information on these will be shared at final announcement stage. DWP is unable to offer redeployment to individuals until after final one to ones and will offer the same opportunities to Operations and Corporate Centre staff displaced by People and Locations Programme.

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 Wembley Olympic House and Watford Exchange 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.