


Site Level Equality Analysis for: Camden NiNo Hub, Camden Town, 97-99 Camden High Street, London NW1 7JN Site reference: 71193

Date: 10th April 2017



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

The proposal is to transfer 61 staff (mix of FOH and BOH as this is an interviewing site) and National Insurance Number unit services from the unit in Camden at 77-79 Camden High Street into the Dalston JC in Tottenham Road, Hackney. The two offices are 3.7 miles apart and 23 minutes by public transport, 26 minutes by car and 1 hour and 7 minutes walk. (Google maps).

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
Camden	33.71%	66.29%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Camden area is higher than the national average.

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 then staff may use the contracted interpreting services: 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.)

This site is a front facing office which interviews customers who are applying for a national insurance number.

The process of applying for a National Insurance Number does not entail customers having to attend the premises on a regular basis therefore the proposal should have little impact on public services.

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.

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
Camden	7.05%	7.40%	85.55%
National	8.5%	9.4%	82.00%

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

The percentage of the public in the Camden area with a disability that limits day to day activities is lower than the national average, which 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.

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 Camden site is approximately 3.7 miles from the Dalston JC. 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 the Dalston building by applying existing policies and practices where a customer has difficulty attending the building. These policies and practices advance equality of opportunity by ensuring the disabled person can access the Department's service. The Department has also taken into account that some disabled customers will have needs in relation to accessibility (e.g. wheelchair users). The Dalston Jobcentre building 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
Camden	48.96%	51.04%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

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 Dalston JC 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.

This site is a front facing office which interviews customers who are applying for a national insurance number which does not require frequent attendance.

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
Camden	2.20%	4.46%	13.59%	16.11%	37.03%	20.86%	5.75%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

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
Camden Nino Unit	33.96%	1.27%	1.43%	4.46%	12.09%	0.21%	0.58%	25.47%	20.55%
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.

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. 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 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

There are 61 staff impacted by this proposal which is to transfer all services from Camden National Insurance Number Unit into Dalston JC.

All one to ones have been completed

53 staff have agreed to relocate (11 outwith mobility) 11 staff are outwith mobility and refuse to relocate to the new site and 11 have health issues which impact on their mobility.

The 11 staff who have raised mobility issues have expressed a preference for other local sites including Barnet JCP, Finchley, Highgate, Marylebone, Wembley JCP or Kentish Town/Highgate and DBC, Harrow and City Tower

If moves cannot take place to Dalston then potential redeployment to alternative sites will be explored further in future one to one discussions.

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
Camden Nino Unit	52.46%	16.39%	31.15%
All DWP	8.97%	65.17%	25.86%

Source: Resource Management, December 2016

The percentage of ethnic minorities in the Camden office is significantly higher than the DWP average, even taking into account the high percentage of “unknowns”.

No issues in this category have been raised, however, 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
Camden Nino Unit	4.92%	85.25	9.84
All DWP	5.63%	73.06%	21.31%

Source: Resource Management, December 2016

The percentage of staff with a disability in the Camden office would appear to be slightly lower than the DWP average, although there is a 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.

■ members of staff have raised issues with health during the one to one process.

■ has requested a move to Harrow office because of severe health difficulties

■ has issues travelling on public transport

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■.

The locations that the 4 Staff above have asked for them to be considered for are

1. Barnet JCP, Finchley, Highgate.
2. Marylebone
3. Wembley JCP or DBC, Harrow
4. Kentish Town/Highgate

Alternative arrangements for redeployment will be explored in the next round of one to one activity.

No other issues have arisen but 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
Camden Nino Unit	52.46	47.54
All DWP	32.18%	67.82%

Source: Resource Management, December 2016

Camden 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.

However no issues have been raised in the course of the staff one-to-ones or from elsewhere. Should any arise, the Department considers that any negative impacts can be mitigated as part of business as usual at the office, by applying existing practices and policies, e.g. flexible working patterns.

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

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

It is not anticipated that staff would be disproportionately impacted because of gender

reassignment as a result of the Estate Strategy and any potential relocation. No evidence has been presented following the 1-2-1 discussions or from elsewhere to suggest that the proposal would have a negative (or positive) impact on this group. There 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+
Camden Nino Unit	1.64%	4.92%	13.11%	49.18%	26.23%	4.92%
All DWP	2.92%	11.20%	22.39%	38.19%	23.83%	1.47%

Source: Resource Management, December 2016

The age distribution shows a slight variation against the DWP averages for the older 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 Dalston JC

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
Camden Nino Unit	63.93%	36.07%
All DWP	59.74%	40.26%

Source: Resource Management December 2016

The Camden Nino Unit has a lower proportion of part time or part year staff than the DWP average.

No 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 transfer 61 staff (mix of FOH and BOH as this is an interviewing site) and National Insurance Number unit services from the unit in Camden at 77-79 Camden High Street into the Dalston JC in Tottenham Road, Hackney. The two offices are 3.7 miles apart and 23 minutes by public transport, 26 minutes by car and 1 hour and 7 minutes walk. (Google maps).

Dalston JC has good transport links and is one of three Nino hubs delivering services in London. The NINO teams are predominantly front facing staff, carrying out interviews and identity checking.

For customers who use the Nino unit services this will involve a one off visit to apply for a National Insurance number and the change of location will have little impact. Although this will involve a change of location for some customers, who may require follow up appointments, any issues will be mitigated by business as usual process within the Dalston JC site.

61 staff are currently working from Camden Nino unit and all have had one to one discussions.

53 staff have agreed to relocate to Dalston Jobcentre (outwith mobility) which is 3.7 miles away. [REDACTED] has requested a facilitated transfer to Harrow and [REDACTED] others have requested redeployment to other sites [REDACTED]

11 staff will have entitlement to excess fares.

3 members of staff are outwith mobility and have requested a move to alternative local sites.

Discussions on alternative redeployment sites for the [REDACTED] individuals ([REDACTED] and 3 outwith mobility) will be progressed in the next round of one to one activity.

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 Dalston 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.