

Site Level Equality Analysis for London City Tower, London 99600

Date: 08 January 2018

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 retain London City Tower (99600) as a National Insurance Number Office.

City Tower Jobcentre will import 90 Counter Fraud and Compliance Directorate (CFCD) staff from divest site Cityside National Insurance Number Office (71184).

City Tower Jobcentre will export 52 FOH staff to Poplar Jobcentre (12938).

It is 2.3 miles from City Tower to Poplar which takes 12 minutes by car or 20 minutes by public transport. (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
Tower Hamlets	54.81%	45.19%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The statistics suggest that there is a higher level, than the national average, of ethnic minorities in this area. There is no evidence to suggest that the proposal would have an adverse impact on race or ethnicity or affect the other aims of the equality duty in relation to this group.

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
Tower Hamlets	6.79%	6.71%	86.50%
National	8.5%	9.4%	82%

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

The statistics are within national averages. It is likely that those with a physical or mental impairment that either affects their mobility or ability to change site will be impacted 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 by customers. 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 Department considers that any negative impact can be mitigated as part of business as usual at the Poplar JCP Office

building by applying existing policies and practices where a customer has difficulty attending the building. These policies and practices advance equality of opportunity by ensuring the disabled person can access the Department's service. For example the Department can consider whether personal attendance is necessary at all or if a home visit can be arranged.

The Department has also taken into account that some disabled customers will have needs in relation to accessibility (e.g. wheelchair users). The Poplar 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
Tower Hamlets	51.52%	48.48%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The statistics are within national averages. 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 the Poplar building 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.

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
Building	2.63%	3.72%	16.36%	21.32%	37.29%	15.57%	3.11%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

The statistics are broadly within national averages and there is no evidence to suggest that the proposal would have an adverse impact on age related equality issues or affect the other aims of the equality duty in relation age.

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
Tower Hamlets	27.08%	1.07%	1.65%	1.07%	34.51%	0.32%	0.32%	19.15%	15.38%
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 are broadly within national averages and there is no evidence to suggest that the proposal would have an adverse impact on religion/beliefs related equality issues or affect the other aims of the equality duty in relation to religion/beliefs.

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

All 49 staff have had a one to one and the issues or concerns raised were:

- Parking at proposed site
- Capacity of site to accommodate staff.

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
City	52.17%	17.39%	30.43%
All DWP	8.86%	68.11%	23.03%

Source: Resource Management December 2016

The percentage of ethnic minorities in the City Tower Jobcentre office is higher than the DWP average. There is no evidence to suggest that the proposal would have an adverse impact on race or ethnicity or affect other aims of the equality duty in relation to this group.

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

	Disabled	Non-Disabled	Unknown
City	0.00%	73.91%	26.09%
All DWP	5.83%	78.4%	15.77%

Source: Resource Management December 2016

The statistics are lower than national averages for disabled but there is a higher than average of 'Unknown'. The data does not cover the type of impairments the disabled employees have, or how these may be impacted by the changes, though the Department considers that employees with reduced mobility could be impacted by the change in location. However, no issues have been raised in one-to-one meetings with staff around building access or transport which may impact staff with a disability. The Department will take steps to mitigate the impact of any disadvantage through continuing consultation with employees and consideration of reasonable adjustments.

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

	Male	Female
City	56.52%	43.48%
All DWP	31%	69%

Source: Resource Management December 2016

The statistics suggest that there is a lower level of females, than the national average. 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. 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. There have been no issues raised during the 1 to 1 consultations with employees.

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 to suggest that the proposal would have an adverse 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+
City	2.17%	26.09%	43.48%	17.39%	8.70%	2.17%
All DWP	1.3%	10.5%	22.7%	39.9%	23.8%	1.8%

Source: Resource Management December 2016

It is not anticipated that staff would be disproportionately impacted because of their age as a result of the Estate Strategy and any potential relocation.

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 to suggest that the proposal would have an adverse 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 were no issues raised in the 1-2-1's with regards to Sexual Orientation.

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

DWP gathers some information on religion and beliefs of staff via the annual staff survey, but completion is voluntary and numbers cannot be broken down to building level. It is not anticipated that staff would be disproportionately impacted because of their religion and beliefs as a result of the Estate Strategy and any potential relocation. DWP policy includes the provision, where possible in their buildings, of a Quiet Room for staff to use for prayer and contemplation.

There were no issues raised in the 1-2-1's with regards to Religion/Beliefs.

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 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 to suggest that the proposal would have an adverse impact on this group.

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
City	80.43%	19.57%
All DWP	57%	43%

Source: Resource Management March 2016

It is not anticipated that staff would be disproportionately impacted because of their work pattern as a result of the Estate Strategy and any potential relocation.

No other significant risks with regards 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 Department 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 retain London City Tower (99600) as a National Insurance Number Office.

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It is 2.3 miles from City Tower to Poplar which takes 12 minutes by car or 20 minutes by public transport. (Google Maps).

The current proposal has identified that there are no potential negative impacts in terms of equality for persons with protected characteristics. However 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 London City Tower and Poplar Jobcentre under existing policies and practices, as part of business as usual.

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

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