

Site Level Equality Analysis for: Dalston JCP, Playle House, Tottenham Road, London N1 4BY

Site reference: 71270

Date: 31/03/17

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.

Brief outline of the proposal

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

The proposal is to divest Dalston JCP (71270), exporting 39 WSD, 2 FES staff and services to Hackney JCP (71271). This will move approximately 42 staff into Hackney JCP.

The distance between the two sites is approximately 1.1 miles, with travelling times by car 7 minutes; 11 minutes by bus; 12 minutes by train and 22 minutes walking.

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
Hackney	45.34%	54.66%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Hackney area is more than national average. Despite this variation, no evidence has been presented to suggest that the proposal would have an adverse impact on members of the public because of their race or ethnicity. It should be noted that all claimants should receive personalised tailored support, taking account of individual circumstance recognising capability (including health conditions), disability, language barriers and caring responsibilities. Claimants, including those who are vulnerable, are only asked to agree reasonable steps appropriate to individual circumstances.

DWP acknowledges that the proposals may increase travel time and costs for claimants when they are required to attend Hackney JCP. This will be particularly so for those who currently live within easy reach of Dalston JCP.

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
Hackney	7.34%	7.15%	85.51%
National	8.5%	9.4%	82.00%

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

The percentage of the public in Hackney JCP with a disability that limits day to day activities is fractionally lower than the national average. 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 Dalston JCP is approximately 1.1 miles from the Hackney office. It is recognised that the 1.1 mile distance can amount to a considerable difficulty for a disabled person either in walking this extra distance, or the change it will cause to their journey.

The Department considers that any negative impact can be mitigated as part of business as usual at the Hackney JCP 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 Hackney 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
Hackney	49.55%	50.45%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

Insert observations, impacts identified and mitigations.

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 Hackney JCP 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 choose 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 choose 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 choose 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
Hackney	2.96%	3.04%	12.20%	19.04%	38.71%	19.96%	4.09%
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
Hackney	38.63%	1.25%	0.64%	6.28%	14.10%	0.76%	0.53%	28.20%	9.60%
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

Approximately 42 DWP staff will move to the co-location site Hackney which includes Jobcentre staff and Operational Excellence Directorate staff.

All one to one discussions have been completed and only minor issues were identified - relating to car parking, caring responsibilities and location of the divested site being near to family and friends, these issues did not relate to difficulties related to their protected characteristic(s) but were general concerns of the staff. The issues identified can be resolved via existing policies.

██████████ have indicated they would refuse to relocate if the move was to Hackney.

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
Dalston	59.09%	15.91%	25.00%
All DWP	8.97%	65.17%	25.86%

Source: Resource Management, December 2016

The percentage of ethnic minorities in the Dalston JCP office is 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
Dalston	4.55%	72.73%	22.73%
All DWP	5.63%	73.06%	21.31%

Source: Resource Management, December 2016

The percentage of staff with a disability in the Dalston JCP office 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. 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. No other issues have been identified. No members of staff have been identified as requiring a reasonable adjustment related to mobility. 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
Dalston	38.64%	61.36%
All DWP	32.18%	67.82%

Source: Resource Management, December 2016

Additional travel time impacting on caring and caring responsibilities in general -

██████████ FES team identified caring responsibilities and the impact of the additional travel would have ██████████ prepared to relocate to Hoxton or Stratford offices.

On-going discussions have been agreed and management are seeking a solution which will be offered to the staff when known.

Dalston JCP has a slightly lower than 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.

However, issues have been raised in the course of the staff one-to-ones. Should any others 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+
Dalston	0.00%	9.09%	47.73%	15.91%	25.00%	2.27%
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 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 Hackney 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 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
Dalston	68.18%	31.82%
All DWP	59.74%	40.26%

Source: Resource Management December 2016

The Dalston JCP office has a lower proportion of part time or part year staff than the DWP average.

No other significant risks with regard to equality issues have been identified and wider consultation has not been considered necessary at this stage. All staff likely to be impacted will be engaged by their managers in frequent one to one discussions, with the opportunity to explore their options and access the full range of support offered by DWP under Departmental workforce management and equality policies. Local Human

Summary of equality impacts

The proposal is to divest Dalston JCP (71270), exporting 40 WSD, 2 FES staff and services to Hackney JCP (71271). This will move approximately 42 staff into Hackney JCP. The distance between the two sites is approximately 1.1 miles, with travelling times by car 7 minutes; 11 minutes by bus; 12 minutes by train and 22 minutes walking.

For members of the public who currently use Dalston jobcentre,

- 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 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.

Analysis of the staffing information identified issues covering the following:

- Staff/family/friends living in close proximity to the divestment site. As a solution It has been agreed that staff will be allocated to the requested sites where feasible with agreement from District Manager
- Access to car parking - There is a car park at Hackney which is at capacity with space also allocated to district staff. There is also a clear policy in place as well as a buddy system.
- Re-vised start/end times due to changes in journey times, covered by the Employee deal – On-going discussion with management to agree a solution.
- [REDACTED] indicated they would refuse to relocate to Hackney. [REDACTED] reasons are recognised and there may be a local solution that will help but this depends on further negotiation with WSD about space that could be made available in a closer site.

Where impacts have been identified: Mitigating actions are in place to eliminate or considerably reduce the negative impacts the proposal may have on groups of people who share protected characteristics, particularly disability and gender. With mitigations in place, we conclude that no groups of people with protected characteristics are disproportionately impacted compared to the wider pool of people who are affected.

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 Hackney JCP office 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.