

Site Level Equality Analysis for Middlesex House, 29-45 High Street, Edgware, HA8 7DX London 23000

Date: 10/05/2017

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 proposal.

The Department for Work and Pensions (DWP) announced new proposals on Wednesday, 26 January 2017 to relocate some of its Jobcentre Plus offices.

Jobcentre Plus operations have changed in recent years as people make more use of online and telephone services, generally only attending for appointments or for help in researching job vacancies.

To reflect this, achieve more efficient use of DWP premises and save public money, a proposal was made to move Edgware Jobcentre into the Hendon Jobcentre.

Guidelines around the movement of jobcentres, referred to as 'ministerial criteria', have been used for many years across the whole of the UK network. They originated from a desire to standardise the circumstances when considering the movement of one jobcentre to another.

DWP believe that it is reasonable to expect claimants to travel 3 miles or 20 minutes by public transport of their existing jobcentre. Where it is proposed to move or close an office, and the move to a new jobcentre is further than these criteria, DWP has the option to consult publicly about this proposal. The proposal to move to Hendon Jobcentre falls outside these criteria:

- distance: 4.0 miles
- public transport: approximately 29 minutes
- car: 16 minutes

(Data from Google maps)

The public consultation paper, ***Proposal for the future of Edgware Jobcentre***, was published on 30 January 2017. It invited comments from everyone with an interest in the future of this jobcentre. This included the closure of the buildings with the services provided being transferred to another jobcentre within London.

A total of 5 responses to the public consultation were received. 3 responses were from individuals or members of the public. 2 of these individuals are claimants who use Edgware Jobcentre. 1 response came from The Commissioning Group, London Borough of Barnet, and 1 from the Barnet Labour Group.

No response to the public consultation mentioned any issues connected with the protected characteristics.

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
Barnet	31.83%	68.17%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The census data for the local authority shows a higher percentage of ethnic minorities than the national average.

No responses to the public consultation raised any potential impacts due to race or ethnicity in relation to the site move.

Mitigations for potential issues

- DWP acknowledges that the proposals included in the consultation may increase travel time and costs for claimants when they are required to attend Hendon jobcentre. This will be particularly so for those who currently live within easy reach of Edgware 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, the Department 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. Work coaches will help sign post claimants in such circumstances.
- The net increase in travel costs for claimants with protected characteristics who have to attend the JCP fortnightly may be significant, especially those that have formerly been able to access the Edgware site without the need for public transport. Most former Edgware claimants will see an increase in travel time and cost irrespective of where they currently live.
- The Department does not expect any proposed changes to our estate in itself to result in additional benefit entitlement sanctions. Although the Department does not collect data for specific geographical areas for example within cities or towns it should be noted that in the year to June 2016, the number of sanctions fell when compared to the previous year. This reduction is specifically due to on-going work to ensure claimants know and understand expectations with their work coaches.
- The National Audit Office has estimated that a million jobseekers missed appointments between July 2015 and December 2015 compared with only 34,000 sanction referrals a rate of 3.4%. The concerns about public transport are an everyday issue and will be dealt with as they have always been: good cause will be considered in exceptional circumstances and if good cause is accepted then 'doubts' will not be raised.
- DWP is not reducing its' services and is committed to retaining a jobcentre network in London. The offices proposed for closure will deliver economies of scale, which

will enable DWP to deliver enhanced services to support business improvements including digital services, group information support and access to a wider spectrum of partners and employers.

- DWP is committed to moving the full staff allocation from Edgware Jobcentre to Hendon Jobcentre. These proposals will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver a full service across all jobcentres.
- The overall aim is to provide an enhanced service in jobcentres: IT equipment will be moved and rehoused in the new offices. Claimants will continue to be encouraged to bring their own electronic devices into jobcentres to make good use of DWP's free Wi-Fi to help them manage their online claim and support their jobsearch activities. Dedicated staff will be available to support claimants by delivering services and additional support in our digital suites.

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
Barnet	6.59%	7.42%	86.00%
National	8.5%	9.4%	82%

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

The percentage of the public in Barnet with a disability that limits day to day activities is slightly 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.

No responses to the public consultation raised any potential impacts due to disability in relation to the site move.

Mitigations for potential issues

- DWP acknowledges that there is likely to be an impact on claimants with a physical or mental impairment that affects their mobility.
- DWP considers that any negative impacts can be mitigated as part of business as usual at the Hendon Jobcentre by applying existing policies and practices where a disabled customer has difficulty attending.
- DWP's work coaches personalise the support provided for each claimant based on individual need and circumstance. Where claimants have limitations due to a health condition or disability or because of caring responsibilities, then this is taken into account when arranging any attendance. DWP has various ways of interacting with vulnerable claimants, including:
 - face-to-face

- email
 - telephone
 - post
 - SMS.
-
- Most severely disabled with significant physical or mental impairment are not required to attend the jobcentre, but can do so on a voluntary basis. In these circumstances home visits can be arranged, interviews can be conducted by telephone and claimants contacted by email. If the customer with significant mobility issues wishes to attend the jobcentre taxi fares for them and a carer, if required, can be reimbursed.
 - For disabled customers that qualify for ESA as part of the Work Related Activity Group, travelling expenses can be refunded for pre-arranged interviews in connection with their benefit claims, or attendance that includes a medical examination or work capability assessment. These claimants are responsible for fares to attend mandatory interviews which are held twice a year. It can be argued that the impact on this group will be relatively low due to infrequency of site visits and interviews can take place in a jobcentre closest to their homes.
 - The Department does not expect any proposed changes to our estate in itself to result in additional benefit entitlement sanctions. Although the Department does not collect data for specific geographical areas for example within cities or towns it should be noted that in the year to June 2016, the number of sanctions fell when compared to the previous year. This reduction is specifically due to on-going work to ensure claimants know and understand expectations with their work coaches.
 - The National Audit Office has estimated that a million jobseekers missed appointments, across the United Kingdom, between July 2015 and December 2015 compared with only 34,000 sanction referrals. On-going work to ensure claimants understand and agree expectations with their work coaches has supported this reduction.
 - DWP is not reducing its' services and is committed to retaining a jobcentre network in London. The offices proposed for closure will deliver economies of scale, which will enable DWP to deliver enhanced services to support business improvements including digital services, group information support and access to a wider spectrum of partners and employers.
 - DWP is committed to moving the full staff allocation from Edgware Jobcentre to Hendon Jobcentre. These proposals will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver a full service across all jobcentres.
 - The overall aim is to provide an enhanced service in jobcentres: IT equipment will be moved and rehoused in the new offices. Claimants will continue to be encouraged to bring their own electronic devices into jobcentres to make good use of DWP's free Wi-Fi to help them manage their online claim and support their jobsearch activities. Dedicated staff will be available to support claimants by delivering services and additional support in our digital suites.

- DWP has also taken into account access needs of disabled customers (e.g. wheelchair users). Hendon Jobcentre is already accessible to its existing disabled customers and fully compliant with the requirements under the Equality Act 2010

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

	Male	Female
Barnet	48.45%	51.55%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The gender distribution in the Barnet area is very close to the national average.

While no issues were raised connected to this protected group the DWP does consider 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.

Mitigations for potential issues

- The Department considers that any negative impacts can be mitigated as part of business as usual at Hendon 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.
- DWP aims to arrange interviews with claimants with caring responsibilities giving maximum notice of time and location and will aim to rearrange if the appointment coincides with their caring responsibilities.
- The net increase in travel costs for this category of claimant with the protected characteristic of gender who have to attend the Jobcentre fortnightly will be significant, especially those that have formerly been able to access Edgware jobcentre without the need for public transport.
- 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.
- The Department is committed to retaining an accessible Jobcentre network, continuing to offer the same level of service to claimants ensuring effective support for unemployed people/claimants in all areas. Our aim is to maintain and improve our services, making the best use of our space when merging some smaller job centres with larger ones. By taking on more Work Coaches nationwide we are also working to ensure a high quality service is maintained, delivering tailored 1-2-1 support to those claimants who require it.
- The Department does not expect any proposed changes to the DWP estate in itself to result in additional benefit entitlement sanctions. In the year to June 2016, the number of sanctions fell when compared to the previous year. This reduction is specifically due to on-going work which ensures all our claimants know and understand expectations. Clearly where the Department understands that there are disruptions to public transport there will be no question of applying sanctions to anyone missing or turning up late for an appointment. We will always make appointment times that accommodate for example the claimant's caring responsibilities and mobility requirements.
- The National Audit Office has estimated that a million jobseekers missed appointments, across the United Kingdom, between July 2015 and December 2015 compared with only 34,000 sanction referrals. On-going work to ensure claimants understand and agree expectations with their work coaches has supported this reduction.

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
Barnet	3.77%	3.15%	10.19%	13.39%	35.73%	26.57%	7.21%
National	3.83%	4.02%	10.49%	10.57%	31.74%	30.01%	9.31%

Source: Census Data 2011 KS102EW (Age)

The census figures for the Barnet area are roughly in line with the national figures.

No issues were raised in the responses to the public consultation that suggested 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

Mitigations for potential issues

- The Department considers that any negative impacts can be mitigated as part of business as usual at the Hendon Jobcentre, 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 Hendon Jobcentre. This will be particularly so for those who currently live within easy reach of Edgware 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.
- The Department does not expect any proposed changes to our estate in itself to result in additional benefit entitlement sanctions. Although the Department does not collect data for specific geographical areas for example within cities or towns it should be noted that in the year to June 2016, the number of sanctions fell when compared to the previous year. This reduction is specifically due to on-going work to ensure claimants know and understand expectations with their work coaches.
- The National Audit Office has estimated that a million jobseekers missed appointments, across the United Kingdom, between July 2015 and December 2015 compared with only 34,000 sanction referrals. On-going work to ensure claimants understand and agree expectations with their work coaches has supported this reduction.

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
Barnet	41.21%	1.27%	6.15%	15.18 %	10.31 %	0.36%	1.06%	16.08%	8.39%
National	58.86%	0.15%	0.16%	0.04%	0.75%	0.33%	0.21%	32.66%	6.85%

Despite the differences from the national average, no potential adverse impacts of the proposal have been raised or otherwise identified.

No issues were raised in the responses to the public consultation that suggested that the proposal would have a disproportionate negative impact on any religion or belief grouping, or affect the other aims of the equality duty in relation to 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

All 26 members of staff have taken part in 121 conversations.

██████████ staff have identified caring responsibilities that could impact on mobility.

██████████ identified health issues that could impact on mobility.

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 and asked to provide details of the impact of the proposals on their staff.

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

	Ethnic Minority	White	Unknown
Edgware	58.33%	33.33%	8.33%
All DWP	8.86%	68.11%	23.03%

Source: Resource Management December 2016

The percentage of ethnic minorities in the Edgware office is higher than the DWP

average, although there is a small percentage of “unknowns” so the variation is not completely certain it will however remain over the national average.

No issues in this category have been raised in the course of the staff one-to-one meetings. No evidence has been presented to suggest that the proposal would have an impact on DWP or external suppliers’ members of staff because of their race or ethnicity.

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

	Disabled	Non-Disabled	Unknown
Edgware	4.17%	95.83%	0.0%
All DWP	5.83%	78.4%	15.77%

Source: Resource Management December 2016

The percentage of staff with a disability in the Edgware office would appear to be slightly below the DWP average. Also, the data does not cover the type of impairments disabled employees have, or how they may be impacted by the changes.

██████████ identified health reasons that could impact on ████████ mobility and ability to move to Hendon. The Department is currently consulting ██████████ and will take reasonable steps to accommodate ████████ requirements and mitigate the potential negative impacts which have been identified. At this stage, the outcome of this consultation cannot be confirmed, though the Department remains committed to taking all reasonable steps in order to accommodate individual needs arising from the proposal.

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
Edgware	12.5%	87.5%
All DWP	31.0%	69.0%

Source: Resource Management December 2016

Edgware has a higher percentage of female staff than all DWP.

The proposal could 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 to consider the worst case scenario in assessing potential impacts of the proposal. In some cases the additional distances could result in an increase in journey time for staff that can affect their caring responsibilities. For example, a mother will have to pick her child up from school at fixed times.

██████ individuals have cited caring responsibilities that could impact on mobility. The

Department will continue to consult with individuals and will take reasonable steps to accommodate requirements, and mitigate the potential negative impacts which may be identified. At this stage, the outcome of this consultation cannot be confirmed, though the Department remains committed to taking all reasonable steps in order to accommodate individual needs arising from the proposal.

No other issues have been raised.

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 the Department is currently exploring all potential options.

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.

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.

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+
Edgware	0.0%	4.17%	16.67%	41.67%	37.5%	0.0%
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 Hendon

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 impact on this group. There may be a need for rooms to be available for confidential conversations. The DWP will provide these rooms 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 members have been identified from the 1-2-1 exercise as currently being 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
Edgware	41.67%	58.33%
All DWP	57.0%	43.0%

Source: Resource Management December 2016

The Edgware office has a higher proportion of part time or part year staff than the DWP average and this may be due to caring commitments and other responsibilities. During the course of 1-2-1 discussions no issues were raised and no other significant risks with regard to equality issues have been identified. 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 move services and 26 staff from Edgware Jobcentre into the Hendon Jobcentre. The distance between the sites is 4 miles. The journey would take 29 minutes by public transport or 16 minutes by car.

Impact on the public

The Public consultation has provided 5 responses from the public. None of the responses concerned the protected characteristics.

A general issue raised in the responses to the public consultation is the increase in time, cost and difficulty that travelling to Hendon Jobcentre will cause for some claimants. The journey from Edgware Jobcentre to Hendon Jobcentre takes 42 minutes by walking and Northern line Tube. The same journey, taking 2 buses takes 55 minutes. A single bus fare is £1.50 by contactless or Oyster card and if a second journey is taken within an hour of the first one commencing they will not be charged for this. The daily capped fare for bus only travel is £4.50 which will help reduce the financial cost.

There are a number of mitigations available for any issues that occur, including issues with travel. Some of these mitigations are detailed in the relevant protected characteristic sections above.

Impact on Edgware Staff

Analysis of the equality information concerning the site indicates that in the majority of cases the movement of staff from Edgware JCP will only have a minor impact. There have been issues raised around health and caring responsibilities. There are on-going discussions with management to mitigate these issues.

Local business partners will have been informed of the change and will carry out the appropriate discussions with their staff.

Future Outreach

The 121 report stated that there will be a continuation of an existing outreach facility at Edgware. DWP is not reducing its services and is committed to retaining an accessible jobcentre network. These proposals will ensure that DWP can respond better to customer demand, support the move towards Universal Credit and increase flexibility to deliver services across the full working day.

The excellent working relationships that are already in place with voluntary and partner organisations will be maintained.

Conclusion

There were issues raised in the 121 conversations with the staff at Edgware Jobcentre. These are being dealt with as part of on-going discussion between management and staff.

The current proposal has identified no specific potential negative impacts in terms of equality for persons with protected characteristics. There are general issues with travel which would affect those with protected characteristics.

The net increase in travel costs for these claimants who have to attend fortnightly may well be significant especially those that have formerly been able to access the Edgware site without the need for public transport. Most former Edgware claimants will see an increase in travel time irrespective of where they currently live.

Benefit recipients are expected to use their benefit payments to manage all of their budgetary needs. For Jobseeker's Allowance and Universal Credit claimants who are required to find work, this includes any costs in looking for work, or travelling to the jobcentre for their Initial Work Search Interview with a Work Coach and on their regular fortnightly day of attendance

Consideration will therefore have to be given to decide whether claimants with protected characteristics have been significantly disadvantaged in comparison to other claimants without any protected characteristics who will also sign on fortnightly and face the same hike in travel costs.

However, mitigating action can be taken to remove or significantly reduce the negative impacts of any future changes on a business as usual basis. There are also plans to continue with the outreach facility that already exists in the Edgware area, which will help with the mitigation of any issues.

We cannot therefore conclude that claimants with protected characteristics, have been significantly disadvantaged in comparison to other claimants without protected characteristics who will also sign on fortnightly and face the same hike in travel costs

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

Where impacts have been identified in this equality analysis and mitigation is put in place this will be monitored and reviewed at the Hendon Site under existing policies and practices as part of business as usual.]