


# Site Level Equality Analysis for: Edmonton Jobcentre, 114-116 Fore Street and 135 Upper Fore Street, Edmonton, N18 2XA and N18 2XF

Site references: 71219 and 71172

Date: 01/06/2017



## 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

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

The proposal is to divest the Edmonton Jobcentre sites at 114-116 Fore Street (71219) and 135 Upper Fore Street (71172), Edmonton and move staff and services to Palmers Green Jobcentre (71272). 39 staff will move from the Edmonton Jobcentre. 38 of these staff are WSD staff and 1 member of staff is from the Fraud and Error Service.

The sites are 2.8 miles from Palmers Green Jobcentre. By car the journey would take 10 minutes and by bus, the journey would take 24 minutes. These figures come from the Property List v17, which references 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
Enfield	38.99%	61.01%
National	24.60%	75.39%

Source: Census 2011 QS201EW (Ethnic group)

The percentage of ethnic minorities in the Enfield area is more than the 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 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 (or for new JSA claimants considered to be in a vulnerable situation) then staff may use the contracted interpreting services: Telephone interpreters are provided by *thebigword*. 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.)

**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
Enfield	7.26%	8.10%	84.65%
National	8.5%	9.4%	82.00%

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

The percentage of the public in Enfield with a disability that limits day to day activities is broadly within 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 Edmonton Jobcentre is approximately 2.8 miles to the Palmers Green Jobcentre. It is recognised that the 2.8 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 Palmers Green Jobcentre 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.

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.

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. Telephone interpreters are provided by *thebigword*. Face to face interpretation using the contracted supplier, *Prestige*, is also available for interviews that require British Sign Language or non-spoken languages.

The Department has also taken into account that some disabled customers will have needs in relation to accessibility (e.g. wheelchair users). The Palmers Green 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
Enfield	48.21%	51.79%
National	49.17%	50.82%

Source: Census Data 2011 QS104EW (Sex)

The proposal may have an impact on those with caring responsibilities (for 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 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.

Travelling costs for mandatory interviews are the claimant's responsibility.

- 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 chose 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, at a mutually agreed time, but may choose to engage more frequently on a voluntary basis. Travelling expenses can be refunded for any additional interviews that may be necessary.
- Once the youngest child reaches the age of 4 the claimant is required to attend work coach interviews quarterly, again they may chose 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 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
Enfield	4.20%	3.79%	10.67%	12.26%	34.34%	27.92%	6.70%
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. There is no evidence to suggest that the proposal would have a disproportionate negative impact on any particular 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
Enfield	64.66%	0.30%	0.18%	0.05%	0.51%	0.01%	0.41%	26.05%	7.82%
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 potential adverse impacts of the proposal have been raised or otherwise identified. There is no evidence to suggest, and DWP does not consider, that the proposal would have an adverse impact on those who share the protected characteristic of religion or belief or affect the aims of the equality duty in relation to religion or belief.

**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.



[REDACTED] blue badge [REDACTED] need parking space. Palmers Green has 2 disabled parking bays, only 1 of which is currently occupied.

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

Source: Resource Management, December 2016

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.

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

It is not anticipated that staff would be disproportionately impacted because of gender reassignment as a result of the Estate Strategy and any potential relocation. No evidence has been presented following the 1-2-1 discussions or from elsewhere to suggest that the proposal would have a negative (or positive) impact on this group.

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**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+
Edmont on JCP	2.33%	4.65%	11.63%	60.47%	20.92%	0.0%
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 Palmers Green Jobcentre.

**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. 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.

**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
Edmonton JCP	72.09%	27.91%
All DWP	59.74%	40.26%

*Source: Resource Management December 2016*

The Edmonton Jobcentre 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 Resources Business Partners and Trade Union representatives will be kept informed of all developments and will be available for staff to consult about their particular circumstances.

## Summary of equality impacts

The proposal is to divest the Edmonton Jobcentre sites at 114-116 Fore Street (71219) and 135 Upper Fore Street (71172), Edmonton and move staff and services to Palmers Green Jobcentre (71272). 39 staff will move from the Edmonton Jobcentre.

The sites are 2.8 miles from Palmers Green Jobcentre. By car the journey would take 10 minutes and by bus, the journey would take 24 minutes.

This Equality Analysis has identified potential negative current impacts for persons with protected characteristics, specifically that of gender, age, race or ethnicity, who are signing on fortnightly which the Department is currently unable to mitigate.

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 Edmonton Jobcentre site without the need for public transport. Most former Edmonton Jobcentre 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

We therefore conclude that claimants with protected characteristics will not be significantly disadvantaged in comparison to other claimants without protected characteristics who will also sign on fortnightly and face the same increase in travel costs.

All 39 staff at Edmonton Jobcentre have had 121 interviews. The only issue raised is that [REDACTED] blue badge [REDACTED] Management have confirmed that there is a disabled car parking [REDACTED] available [REDACTED] at the new site. No other issues were raised by the staff. 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.

## 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 Edmonton JCP 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.