

HMRC Equality Impact Assessment (EQIA)

Final Report - October 2010

HMRC Contact Centre Opening Hours

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Section 1: Executive Summary

This document is a considered response to the feedback received on the consultation stage Equality Impact Assessment (EQIA), which sought views on proposals for changing HMRC Contact Centre opening hours. We were grateful for the detailed feedback received from a number of interest groups.

HMRC aims to be a highly professional and efficient organisation. We are therefore committed to improving the service provided to our customers through our Contact Centres. We are conscious that at times our customers can struggle to get through to us. This causes them inconvenience and expense, as they have to keep calling back in a bid to get through. Tackling the problem is a big challenge. We have a duty to make the most of scarce resources to ensure we're delivering the best service we possibly can.

The change to Contact Centre opening hours we consulted on will improve the service we offer to our customers. Redeploying advisers from very quiet periods (when they are often left waiting for calls) into much busier ones will mean we estimate that we will answer an extra 3% of call attempts. That's a substantial improvement for customers, meaning another 1.7m callers per year will get the support they need when they ring.

However, we wanted to make sure that those changes weren't going to impact disproportionately any particular customer equality group. The EQIA consultation therefore gave people a chance to raise any concerns about potential equality impacts. A number of points were raised, primarily in relation to customers who can only call on a Sunday. We recognise that the initial EQIA lacked data about which customers call us on Saturdays and Sundays, which made it hard to assess the equality impacts - a point made by a number of respondents. To address this we have gathered additional information during the consultation period, which we have used alongside consultation responses to evaluate potential equality impacts. That data established caller demand profiles for specific equality groups, so that we could see whether any groups particularly relied upon Sunday opening to contact us.

Our research has confirmed that the overall number of customers who will be impacted by the changes is small - all caller volumes are low on Sundays, and this trend is mirrored within all the equality groups we looked at (Disabled, Over 65 and English not first language). We've also established that these equality groups represent a similar percentage of total callers on Saturdays and Sundays as during the week. These groups will not therefore be disproportionately impacted by changes to weekend opening hours compared to other HMRC customers. Furthermore, all customer groups will benefit equally from the improved mid-week accessibility that these changes will deliver.

We have also established through a survey of callers who ring on Sundays, that the majority (82%) will not face any difficulties in ringing back on another day. Of those who said they would struggle to call back on another day, many

explained that this was because they cannot get through to HMRC during the week - a situation that these proposals will help to address.

HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager and raise any impacts that arise because of their personal circumstances. Managers will work with HMRC staff to identify a working pattern that balances personal circumstances with business needs. We will offer a range of new working patterns within reduced opening hours including options to support religious observations.

In addition to this, HMRC will provide contact centre staff with four weeks' notice of changes to working patterns, rather than the contractually required two weeks, so that they have the opportunity to rearrange caring arrangements etc, and will continue to give staff the opportunity to request family friendly working patterns that take reasonable steps to balance individual circumstances with business need when considering working pattern requests.

So we believe that there is a compelling case for change. We need to make it easier for customers to get through to us, and these proposals help to achieve that. We recognise that these changes will inconvenience a small number of customers who prefer to contact us on Sundays. However we consider that the substantial benefits we'll deliver for the majority of customers who at times can struggle to contact us at peak times outweighs this inconvenience. We have therefore decided to proceed with implementing changes to opening hours from 6 December 2010. We will use recorded messages to make customers aware of these changes, as well as updating signage in our Enquiry Centres and – over a period of time – updating the forms and letters we send to our customers to reflect changes to opening hours.

1.2 Action Plan

We've identified a range of mitigating actions to reduce any negative impact of changes upon our customers. A full action plan is included in Section 7. Below is a summary of the key actions.

Impact upon HMRC Staff

Some staff currently choose to work Sundays to help balance their work life with personal commitments. The impact of the change to opening hours will vary from person to person according to individual circumstances. HMRC has therefore established a range of mitigating actions that will allow us to address this at an individual level. Those include:

- Offering four weeks' notice of changes to working pattern instead of the two weeks contractually required.
- HMRC will offer a range of new working patterns within reduced opening hours including options to support religious observations.

- Continuing to offer staff the opportunity to request family friendly working patterns that balance caring commitments with HMRC's business needs.
- Managers will work with individual staff members to ensure their individual needs are addressed.

In addition to these measures, we will bring changes to the attention of HMRC diversity networks.

Impact on HMRC Customers

We will communicate opening hours changes using a range of mediums which include Interactive Voice Response (IVR) messages, HMRC Enquiry Centres, Online Services, and arranging for notices to be displayed in languages other than English.

1.3 What is an Equality Impact Assessment (EQIA)?

Equality Impact Assessments (EQIA) are carried out to assess the impact that an activity (a policy or change of policy) might have on a range of diversity groups. EQIA includes looking for opportunities to have a positive impact on the promotion of equality as well as detection of actual or potential negative impacts. The EQIA process helps us to:

- Meet legislative requirements and recognise the Department's commitment to promoting equality.
- Identify and assess the potential impact of policy and guidance on different groups of people.
- Identify ways in which we can promote equality and diversity in our policy and guidance and how we can put it into practice.
- Improve the understanding of the needs, circumstances and experience of those who are affected by our activities.
- Avoid costs relating to complaints of discrimination, including unlawful discrimination by identifying actual and potential inequalities and taking action to remove or mitigate against them.
- Engage people in the development and assessment.

This EQIA gives full consideration to people of different: race, disability status, gender, age, marital status, sexual orientation, transgender, religion or belief, political opinion (Northern Ireland only), languages and people with dependants.

1.4 The Consultation Process

On 1st April 2010, HMRC published an EQIA Consultation Document on the [HMRC website](#). The consultation exercise ran until 24th June 2010 during which time we received a total of 20 written responses, broken down as follows:

Responses from individual customers	1
Responses from customer representative bodies	2
Responses from individual members of staff (or teams)	15 (13 individuals / 2 groups)
Responses from trade unions or staff diversity networks	2

We received a good level of responses from staff, internal diversity networks, Trade Union representatives and external organisations which included the Low Incomes Tax Reform Group (LITRG) and The Institute of Chartered Accountants in England and Wales (ICAEW).

We have considered all of the feedback received both within and outside of the scope of the consultation exercise. This feedback was very useful and informative. Feedback from LITRG and ICAEW highlighted that the organisations would like to see additional research carried out to obtain further insight about the impacts of change upon specific equality groups, including low income customers, older people, people with a disability and customers for whom English is not a first language (including migrant workers). Section 5 (evidence considered) describes how HMRC responded to this concern, and provides an overview of the additional evidence that we gathered.

We would like to thank everyone who took the time to read the consultation document and provide us with feedback.

Section 2 HM Revenue & Customs (HMRC)

HM Revenue & Customs (HMRC) was formed on the 18 April 2005, following the merger of Inland Revenue and HM Customs and Excise Departments. Work is still continuing on our office restructuring programme.

We are here to ensure the correct tax is paid at the right time, whether this relates to payment of taxes received by the department or entitlement to benefits paid.

We collect and administer:

Direct taxes - paid by you or your business on money you earn or capital you gain.

- Capital Gains Tax.
- Corporation Tax.
- Income Tax.
- Inheritance Tax.
- National Insurance Contributions.

Indirect taxes - paid by you or your business on money spent on goods or services.

- Excise duties.
- Insurance Premium Tax.
- Petroleum Revenue Tax.
- Stamp Duty.
- Stamp Duty Land Tax.
- Stamp Duty Reserve Tax.
- VAT.

We **pay** and administer:

- Child Benefit.
- Child Trust Fund.
- Tax Credits.

We **protect** you by enforcing and administering:

- Border and frontier protection.
- Environmental taxes.
- National Minimum Wage enforcement.
- Recovery of student loans.

Section 3 Statutory Obligations

Under the Northern Ireland Act 1998 all public bodies in carrying out their functions relating to Northern Ireland are required to have due regard to the need to promote equality of opportunity:

- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation.
- Between men and women generally.
- Between persons with a disability and persons without.
- Between persons with dependants and persons without.

And to:

- Promote good relations between those of different religious belief and political opinion.
- Promote positive attitudes towards disabled people.
- Encourage participation in public life by disabled people.

In addition in Great Britain under separate Race, Disability and Gender duties public authorities need to have due regard to the need to:

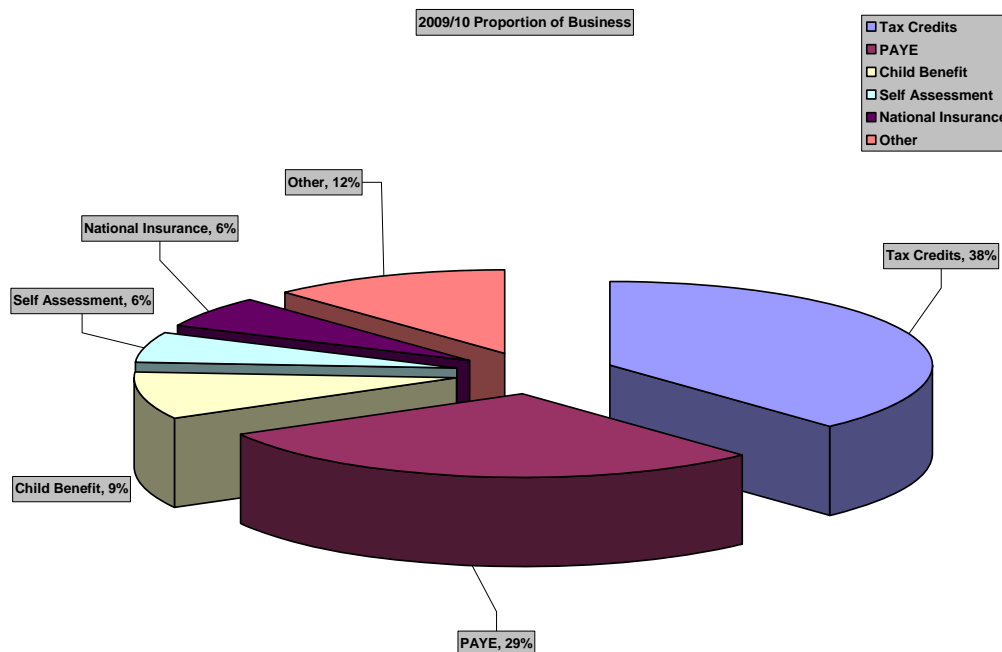
- Promote equality of opportunity between people of different racial groups, those that are covered by the Disability Discrimination Act and men and women generally.
- Eliminate discrimination that is between different racial groups that is unlawful under the Disability Discrimination Act and men and women generally (including transsexual people).
- Promote good relations for people of different racial groups.
- Eliminate harassment which is related to disability or gender (including transsexual people).

HMRC's approach to Equality Impact Assessments meets the statutory requirements set out above.

Section 4: Overview of the proposal to change contact centre opening hours

HMRC Contact Centres handle around 60 million telephone contacts every year across 12 main lines of business including Tax Credits, Child Benefit, PAYE, SA and Employers helplines.

Chart 1: Proportion of calls for main HMRC business areas during 2009/10



We commenced a review of Contact Centre opening hours after identifying a significant opportunity to improve customer service by better matching staff deployment to customer demand profiles. That will support our efforts to raise the performance of Contact Centres to industry standard levels – ensuring that the vast majority of customers can get through when they need to.

Current Contact Centre opening hours evolved over time rather than being designed to meet customer demand profiles. This has resulted in HMRC Contact Centres being open during some periods when demand is very low - for instance, Sunday opening requires 4.9% (530) of staff resource to handle just 1.2% of calls. This reduces the number of advisers available to be deployed during busier periods, when statistics show the majority of customers want to call. As a result, customers can struggle to get through to us during those busy times.

HMRC therefore proposed to alter Contact Centre opening hours, to better match resources to customer demand profiles. Achieving a better match will improve performance, so that a higher proportion of customers can get

through to an advisor when they call. Analysis suggests that an additional 3% (1.7million) of call attempts would be answered first time by moving advisers from quiet periods to busier ones in this way.

A full list of our helplines, with current and proposed opening hours, can be found at Appendix F.

The proposed opening hours are consistent with other Government Departments. For example, DWP Pensions and Pension Credits helplines operate 8am to 8pm Monday to Friday and 9am to 1pm Saturday; Child Support Agency operates 8am to 8pm Monday to Friday and 9am to 5pm on a Saturday and Job Centre Plus runs Monday to Fri 8am to 8pm Monday to Friday.

Section 5: Evidence considered

The proposals for change contained within the HMRC Equality Impact Assessment were based upon a range of evidence:

- Demand profiles for half hourly periods on each line were matched against staff deployment records to identify the points in the week that suffered the greatest mismatch between demand levels and available resource.
- Options for change were developed to address these mismatches. The performance impacts of those changes were modelled, to quantify the improvements in customer service that could be achieved by changing opening hours to deploy more advisers at the times the majority of customers want to call.
- Analysis of employee diversity data looked for trends among the HMRC workforce and, where possible, among Contact Centre staff in particular, to identify potential equality impacts upon staff.
- We assessed the legal and contractual issues associated with changes to staff working patterns.

During the course of the consultation HMRC carried out further data gathering exercises, as we acknowledged that the full range of data needed to assess equality impacts upon customers was not initially available. The data gathered has been used to complement the views of those responding to the consultation to assess equality impacts.

The additional data was gathered by searching within contact records to identify the NI numbers of customers calling on a Sunday. These were then matched against certain characteristics on the customer's records that were identified as equality group indicators. Specific characteristics searched for were:

- Age – analysis of dates of birth identified demand patterns among older people to assess whether they would be disproportionately impacted by changes to opening hours. (The analysis related to those born before 06/04/1945 as this group were specified in the responses received).
- Those with or without a disability - analysis of callers to the Tax Credits Helpline allowed HMRC to identify demand profiles among customers claiming the disability element of Tax Credits, irrespective of whether they were the claimant or claiming on behalf of the eligible individual.
- Customers who do not speak English as their first language – analysis of contact records identified cases in which translation services were used, allowing HMRC to identify call demand profiles among speakers of foreign languages.

In addition, HMRC conducted a survey of customers calling on a Sunday to establish whether those callers would be able to ring on another day, and to explore why they had chosen to ring on a Sunday. That survey was conducted over a period of 2 months, with 13% of callers agreeing to participate.

The results of these exercises have been evaluated alongside pre-consultation data and consultation responses of the proposed changes to opening hours.

Section 6: Equality Impacts

HMRC has assessed the feedback received during the consultation exercise in conjunction with customer call volume analysis and customer feedback survey results. Whilst no impacts specific to Race, Gender, Marital status, With or without dependants, or Political opinion were identified we will continue to monitor and address any issues as they arise. During the consultation HMRC staff raised some specific issues in respect of Sexual Orientation and they have been addressed within this section. Many of the staff responses received were very supportive of the proposed changes, both because they will improve advisers' work / life balance by requiring them to work fewer weekend hours, and because advisers recognised the service improvements that these changes would offer to customers.

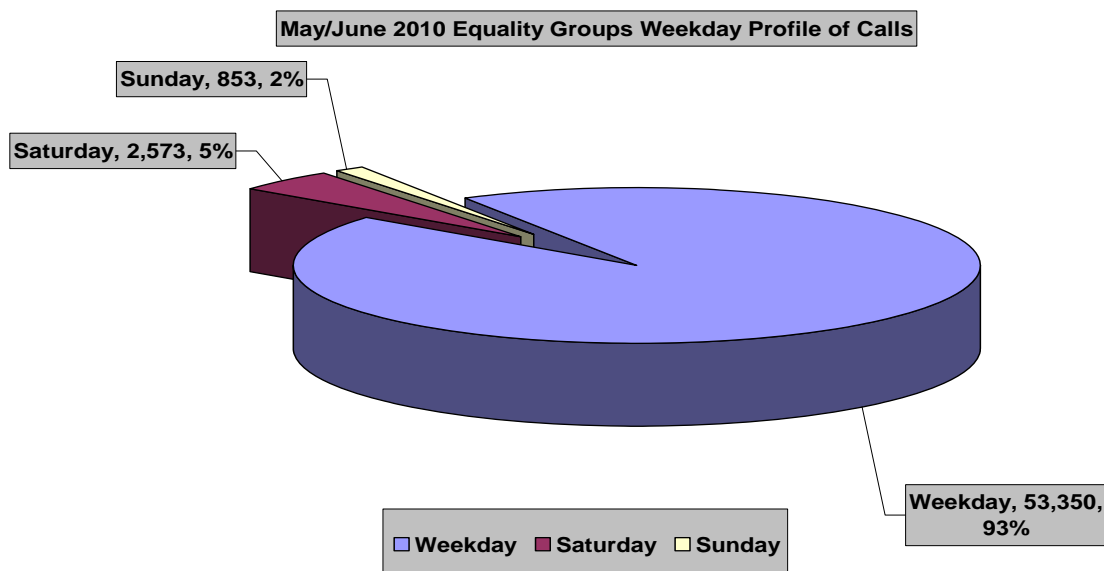
A full summary of consultation responses can be found at Annex C.

Overview of findings

The most significant area of feedback focussed on the potential impacts identified in respect of Disability, Age, and customers who do not speak English. HMRC has used the issues raised to guide the analysis of further data gathered during the consultation process, which has established that:

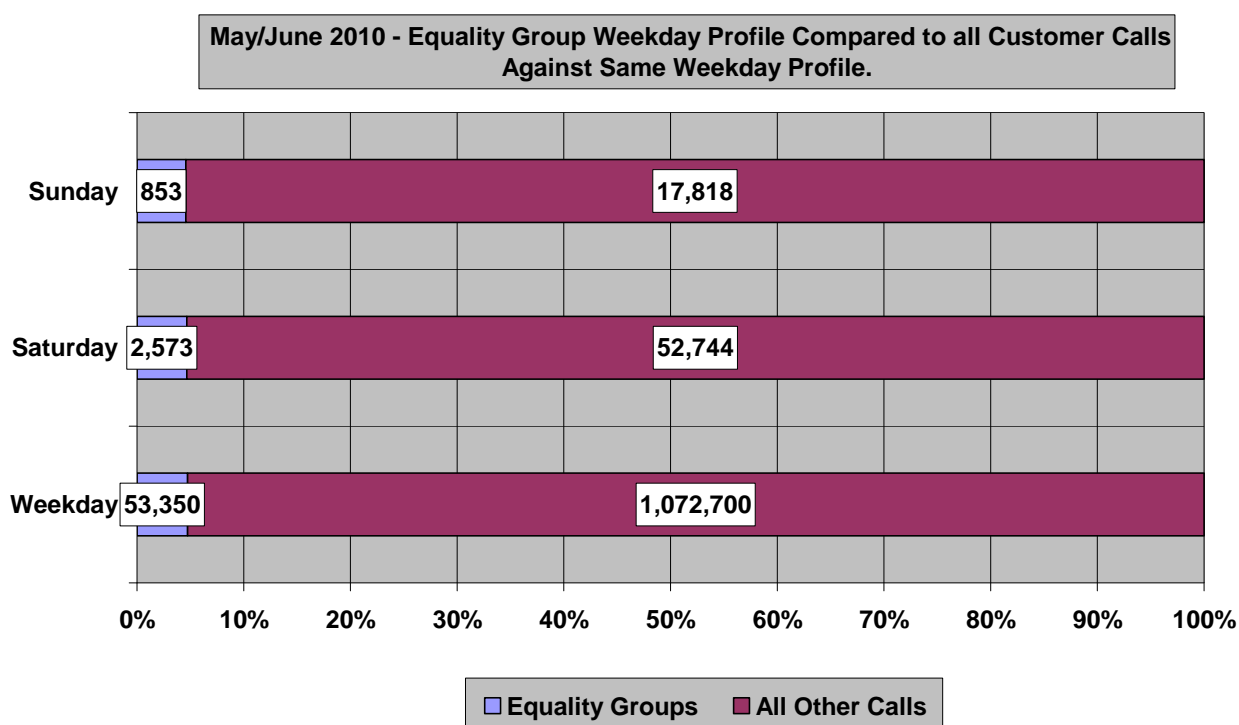
The overall number of customers who will be impacted by the proposed changes within the equality groups we looked at (Disabled, Over 65 and English not first language) is small – data gathered during the consultation process has enabled HMRC to analyse the weekly caller demand profile for customers from these equality groups. Their demand profiles follow a comparable pattern to those from all HMRC customers, with only around 2% of total demand from customers in these equality groups received on Sundays.

Chart 2: May / June 2010 - Equality groups weekday profile of calls



The equality groups we looked at (Disabled, Over 65 and English not first language) will not be disproportionately represented among those customers who will be impacted by the proposed changes – this analysis also compared the proportion of total calls that come from these equality groups on Saturdays and Sundays against all other calls coming into our helplines on those particular days. This has established that when compared to the weekday profiles, these equality groups represent a lower percentage of calls on a Saturday and Sunday. These groups will not therefore be impacted by changes to opening hours to any greater extent than other customers.

Chart 3: May / June 2010 - Equality group weekday profile compared to all customer calls against same weekday profile.



Of those customers who will be impacted, the majority will not face difficulties in calling on another day – in a survey of customers calling on a Sunday, 82% said that they would be able to call on another day. Although 18% said that they would not, when given the opportunity to explain why not, 76% of those customers commented that the reason they call on Sundays is because they find it easier to get through to Contact Centres when they are quieter. The proposed changes to Contact Centre opening hours are designed to make it much easier for customers to get through on weekdays.

Consultation responses also raised concerns about the impact of changes upon HMRC staff who may be required to change their working patterns. Those concerns particularly focussed on staff who currently choose to work Sundays, for instance to meet caring responsibilities.

How HMRC will mitigate impacts

We have identified the following mitigations in response to impacts upon customers:

- Impending changes will be communicated using a range of mediums including Interactive Voice Response (IVR) messages, HMRC Enquiry Centres and Online Services.

HMRC has identified the following mitigations in relation to impacts upon staff:

- HMRC will offer a range of new working patterns within reduced opening hours including options to support religious observations.
- HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager and raise any impacts that arise because of their personal circumstances. Managers will work with staff to identify a working pattern that balances personal circumstances with business needs.
- HMRC will provide staff with four weeks' notice of changes to working patterns, rather than the contractually required two weeks, so that they have the opportunity to rearrange caring arrangements etc.
- HMRC will continue to offer staff the opportunity to request family friendly working patterns (such as part time working).
- HMRC is about to introduce the Reasonable Adjustment Passport under the Disability Discrimination Act (DDA) to allow and plan for the adjustments to move as smoothly as possible with the jobholder to any new role or location as appropriate. The passport will guarantee continuity of any arrangements that are required for the jobholder in the workplace.
- HMRC will continue to work to improve the staff completion rate of internal diversity data.
- Changes to Contact Centre opening hours will be brought to the attention of HMRC Diversity Network Groups.

6.1 People of different racial groups

The responses to our consultation identified the following which may be additional impacts on people of different racial groups.

Customers

Our statistics on customer use of our Contact Centres are not broken down by ethnicity. However, revised opening hours are based on Contact Centre usage and based on the responses received from the consultation exercise the changes in opening hours are expected to impact proportionately on all ethnic groups using Contact Centres at the weekend.

Staff

Although HMRC Customer Contact Directorate (Contact Centres) has a lower percentage of black and minority ethnic (BME) staff than HMRC nationally it is not anticipated that any rearrangement of working patterns will impact disproportionately on staff from a BME background. Staff of all ethnic backgrounds work during the periods in which we propose to reduce our hours.

Mitigating Actions

- HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.
- HMRC will give consideration to the ethnic make up of the population to determine the most suitable methods to communicate to customers.
- We will give staff affected by changes to working patterns the opportunity to discuss changes to those working patterns and discuss any impacts that arise because of their personal circumstances. Managers will work with staff to identify a working pattern that balances personal circumstances with business needs.
- HMRC will use existing messaging techniques to advise customers who call when we are closed, of revised opening hours.
- We will set up individual one to one discussions with managers where we will talk to all staff who are affected by this change and identify how the change impacts on them. We will seek to mitigate the individual impacts that we identify through this process.
- Any issues relating to specific racial groups raised during the staff consultation process will be addressed.
- Changes to Contact Centre opening hours will be brought to the attention of HMRC Diversity Network Groups.

6.2 Those with or without a disability

The responses to our consultation identified the following which may be additional impacts on those with or without a disability.

Customers

HMRC's Equality Impact Assessment did not identify any impacts upon people with a disability.

One consultation response suggested that people with a disability may be disproportionately represented among lower income customers, and that low income customers often use Sundays to sort out financial matters. We have therefore used call records to analyse caller demand profiles among customers irrespective of whether they were the claimant or claiming on behalf of the eligible individual (identifying those customers through the presence of the disability element on their Tax Credit claims). This has established that only 2% of this customer group call on Sundays. Those customers constitute 4% of total Tax Credit callers on a Sunday, which does not significantly deviate from the figure of 3.4% on a typical weekday.

Chart 4: May / June 2010 - Disability group weekday profile of calls

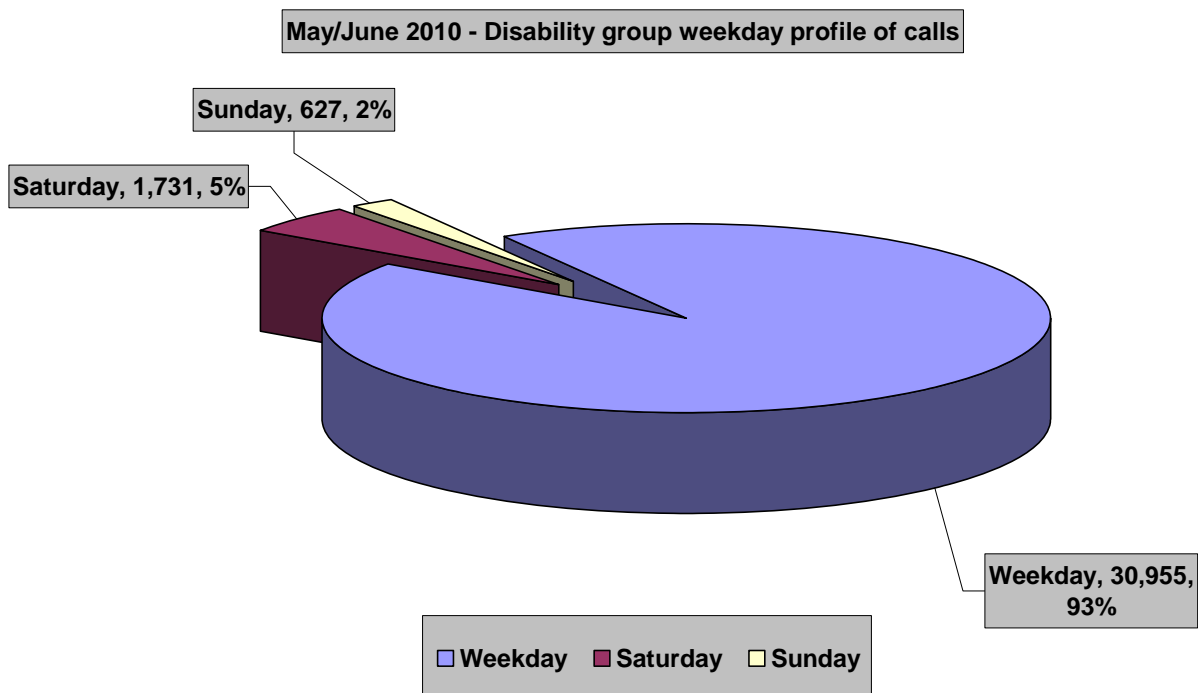
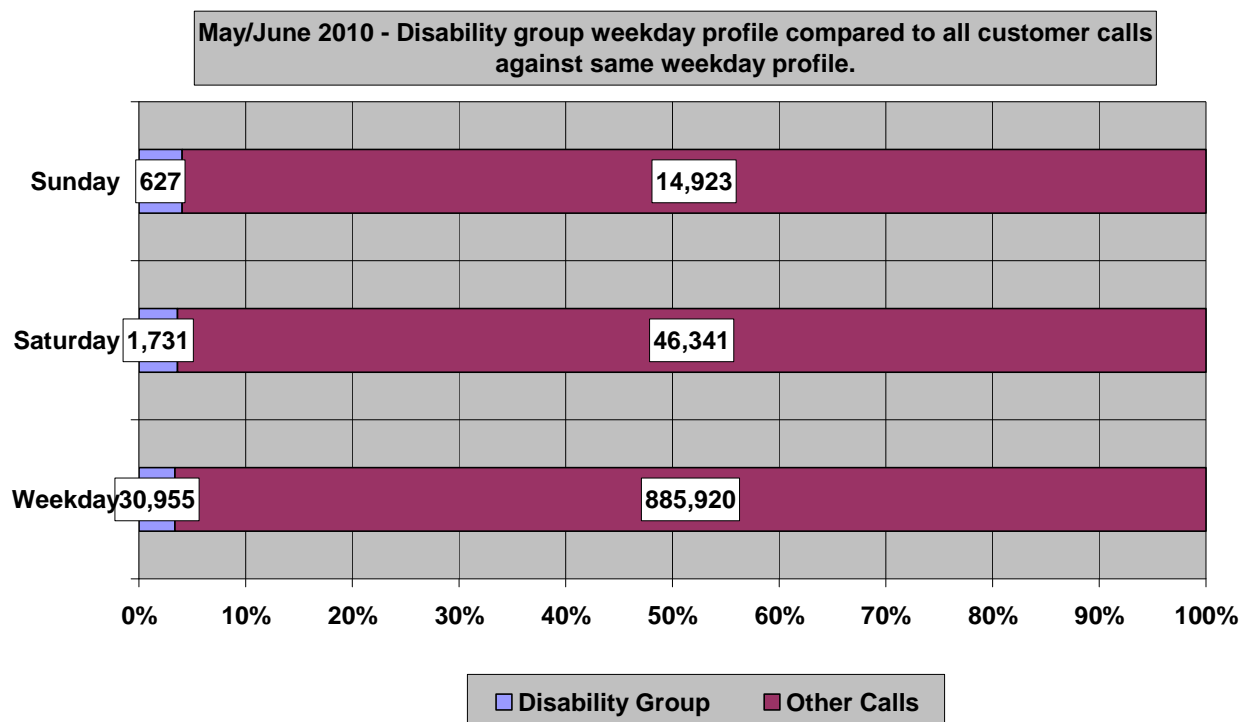


Chart 5: May / June 2010 - Disability group weekday profile compared to all customer calls against same weekday profile.



We are therefore satisfied that customers in this group do not call more frequently on Sundays than on other days, and will therefore not be impacted disproportionately by changes to Sunday opening hours.

No further issues were identified during consultation in respect of customers with a disability.

Staff

Comments were also received indicating a potential disproportionate impact for those staff asking for reasonable adjustment, as a change to operational hours means that staff with a disability will have reduced flexibility around the days and times that they can work to manage their life both in and out of work.

Mitigating action

- We will publicise opening hours changes allowing customers impacted by proposed changes to choose an appropriate time to contact us.
- HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.
- HMRC is about to introduce the Reasonable Adjustment Passport under the Disability Discrimination Act (DDA) to allow and plan for the adjustments to move as smoothly as possible with the jobholder to any new role or location as appropriate. The passport will guarantee

continuity of any arrangements that are required for the jobholder in the workplace.

- HMRC managers will discuss with staff any personal issues arising as a result of changes to Contact Centre hours in order to identify adverse impacts and mitigating action required.
- HMRC will continue to work to improve the staff completion rate of internal diversity data and will monitor the equality impacts arising on racial groups as a result of implementing the changes. Adverse impacts will be identified through the discussions between managers and staff.
- HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager that arise because of their personal circumstances, in order to identify adverse impacts and mitigating action required.
- HMRC will further mitigate the potential impacts of changes to working patterns upon staff with a disability by offering four weeks' notice of changes, rather than the two weeks required by staff contracts. That will give staff a greater opportunity to make any adjustments required to work within new shift patterns.

HMRC collects data on staff disability via its internal HR systems. Completion of this data is optional and data may therefore be incomplete.

6.3 Gender

The responses to our consultation identified the following which may be additional impacts on gender.

Customers

HMRC has not identified any potential impacts upon customers of different gender and no issues were raised during consultation.

Staff

HMRC's Customer Contact Directorate (Contact Centres) has a slightly higher percentage of female staff than HMRC nationally and recognises that women are statistically more likely than men to have dependants or caring responsibilities and they may be affected in one or more ways (see Section 6.4 People with dependants / care responsibilities).

Mitigating action

- HMRC managers will discuss with staff any personal issues arising as a result of changing opening hours in order to identify adverse impacts and mitigating action required. Reasonable solutions, such as changes to working hours and working patterns will be discussed and considered.
- The change to Contact Centre opening patterns will be brought to the attention of the HMRC Diversity Network Groups.

6.4 Age groups (The analysis related to those born before 06/04/1945 as this group were specified in the responses received).

The responses to our consultation identified the following which may be additional impacts on age groups.

Customer

One consultation response suggested that changes to opening hours may impact upon older people, who may require support on Sundays

During the consultation period, HMRC therefore analysed call demand profiles among older people on Taxes Helplines, by matching contact records to the dates of birth held on customer records. This analysis established that customers aged 65 or over constituted a lower proportion of callers on Saturdays (4.4%) and Sundays (1.2%) than on weekdays (8.2%). We therefore consider that these customers will not be disproportionately impacted by these proposals.

A specific concern was raised about the potentially heightened needs of older people during the key business peak that follows the issue of PAYE tax codes. HMRC will revert to current opening hours during peak periods.

Chart 6: May / June 2010 - Age groups weekday profile of calls

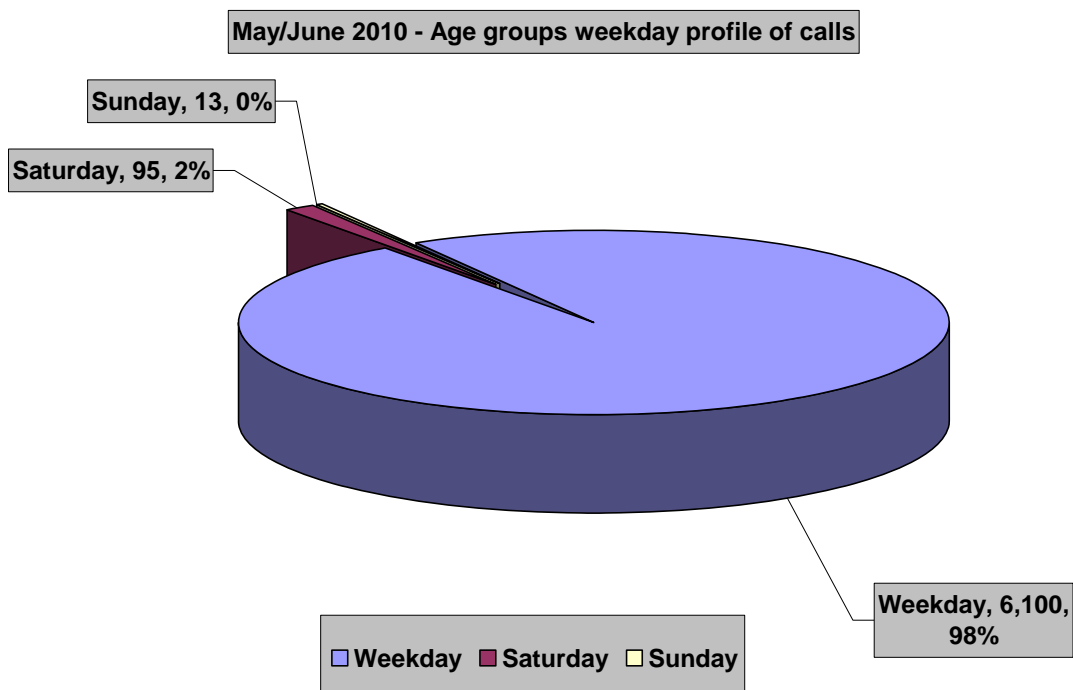
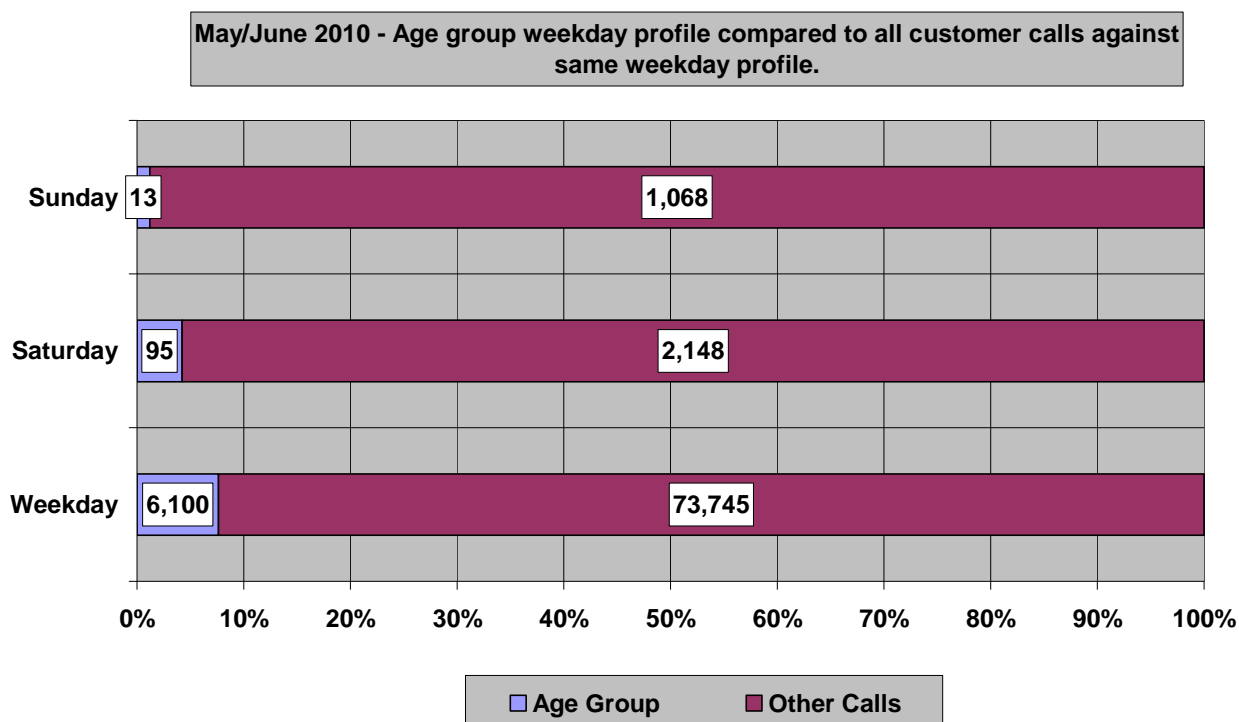


Chart 7: May / June 2010 - Age group weekday profile compared to all customer calls against same weekday profile.



We are therefore satisfied that older customers do not call more frequently on Sundays than on other days, and will therefore not be impacted disproportionately by changes to Sunday opening hours.

Staff

HMRC employs a number of students who may have chosen to work weekends to accommodate studies (while ages do vary, the majority of students are aged between 18 and 21). Staff will be able to discuss alternative working patterns with their managers.

A concern was raised that the loss of unsocial payments among older HMRC staff would represent a cut in pay that had been factored in by staff when calculating partial retirement. HMRC staff will not be able to claim for any loss of unsocial payments. When there is a strong business reason for changing working hours / arrangements HMRC will try and give staff sufficient advance notice of any changes. On this occasion we are giving everyone, including people whose pay will be affected by the changes, 28 days notice about the new opening hours. There is no change to staff contractual terms and conditions as a consequence of changing Contact Centre opening hours.

Mitigating Action

- HMRC expect there to be no adverse impact on customers of different ages and in particular, older customers.
- HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.
- HMRC managers will discuss with staff any personal issues arising as a result of changes to Contact Centre Hours in order to identify adverse impacts and mitigating action required. Reasonable solutions, such as changes to working hours and working patterns will be discussed and considered.
- HMRC will monitor adverse impacts on persons of different ages through the discussions between managers and staff.
- The change to opening patterns will be brought to the attention of the HMRC Diversity Network Groups.
- HMRC staff will not be able to claim for any loss of unsocial payments. When there is a strong business reason for changing working hours / arrangements HMRC will try and give staff sufficient advance notice of any changes. On this occasion we are giving everyone, including people whose pay will be affected by the changes, 28 days notice about the new opening hours. There is no change to staff contractual terms and conditions as a consequence of changing Contact Centre opening hours.

6.5 Marital Status

The responses to our consultation identified the following which may be additional impacts on marital status.

There were no Marital Status issues raised during this consultation in respect of either staff or customers, and HMRC did not identify any potential impact upon persons of different marital status.

6.6 People with dependants / care responsibilities

The responses to our consultation identified the following which may be additional impacts on those people with dependants / care responsibilities.

Customers

HMRC has not identified any impacts upon customers with or without dependents, and no issues were raised during the consultation in respect of this equality group.

Staff

Consultation responses from HMRC staff (including their representatives) raised potential impacts upon staff who may have chosen to work weekends in order to meet midweek caring responsibilities, including some staff working under 'family friendly' agreements.

HMRC recognises that impacts on staff with dependants will be individual and dependent on personal circumstances and the mitigating actions are designed to reflect those individual circumstances.

Mitigating Action

- HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.
- HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager that arise because of their personal circumstances, in order to identify adverse impacts and mitigating action required.
- HMRC will continue to give staff the opportunity to request family friendly working patterns, and will take reasonable steps to balance individual circumstances with business need when considering working pattern requests.
- HMRC will offer staff four weeks' notice of changes to working patterns arising from new Contact Centre opening hours instead of the contractually required two weeks.
- The changes will be brought to the attention of the HMRC Diversity Network Group.

6.7 Sexual Orientation

The responses to our consultation identified the following which may be additional impacts on sexual orientation.

Customers

HMRC does not collect data on the sexual orientation of customers, but does not foresee a disproportionate impact on customers due to their sexual orientation from a change in Contact Centre opening hours. No issues were raised during consultation in respect of this equality group.

Staff

One consultation response suggested that loss of choice of working days could increase the risk of personal attack as staff of different sexual orientation may have to travel alone at night or early mornings, rather than on a Sunday.

HMRC takes the safety of its staff very seriously. In evaluating these concerns, we have considered that all staff currently working Sundays will already also be working on other days of the week. Opening hours on those days are not being extended, and so we do not foresee that the proposed changes will create a new requirement for staff to travel at a time or on days that they don't already travel (although it may result in them working one extra midweek shift per week, to replace Sundays). HMRC also considered that the reduction in Saturday opening hours would result in many staff finishing work earlier on that day, reducing the need for them to travel home during the

evening. HMRC does not, therefore, consider that changes to opening hours are likely to create new risks to staff of different sexual orientation as they travel to and from work.

A concern was raised during consultation that changes to working patterns may limit the choices that transgender staff members can make about when they travel to medical appointments. HMRC does not have any information on Customer Contact Directorate (Contact Centre) transgender staff. Based on the small number of responses received from the EQIA consultation exercise, in relation to the impact of the proposed changes to transsexual/transgender staff within HMRC, we do not expect the proposed changes to adversely affect transsexual/transgender employees. Staff will be able to discuss their personal circumstances with managers when opting into a new shift pattern, and will be given at least 4 weeks' notice of changing work patterns to help them make any changes needed to their personal commitments. HMRC will continue to operate policies that enable staff to request time off through the normal annual leave process, or as special leave in exceptional circumstances.

HMRC has begun to monitor the sexual orientation of staff via its online HR system. However at the moment the numbers of staff who have declared their sexual orientation means that the figures are not robust enough to be used to identify trends or impacts of our proposed policy.

Mitigating Action

- HMRC managers will discuss with staff any personal issues arising as a result of changing opening hours in order to identify adverse impacts and mitigating action required. Reasonable solutions, such as changes to working hours and working patterns will be discussed and considered. Managers understand the need to handle these issues sensitively.
- The change to Contact Centre opening patterns will be brought to the attention of the HMRC Diversity Network Groups.

6.8 People of a different religion or belief

The responses to our consultation identified the following which may be additional impacts on people of different religion or beliefs.

Customers

HMRC holds no information on the religion or belief of customers.

Feedback received during consultation suggested that early closure on a Saturday and closure on Sunday could raise issues for some members of the Jewish community, who may be unable to call during daylight hours on a Saturday when observing the Sabbath. The hours proposed by HMRC are consistent with those of many other Government Departments. HMRC will mitigate the impacts upon Jewish customers by ensuring that changes to opening hours are well publicised, allowing affected customers to choose the most appropriate time to call.

For Northern Ireland HMRC has also considered the impact of these proposals on customers of different community backgrounds. However, HMRC do not foresee any potential impacts in this regard.

Staff

- Concerns were raised during the consultation that some Muslim staff have opted for a Sunday to Thursday fixed working pattern to make religious observations on a Friday. We will mitigate this impact by providing all members of staff with an opportunity to discuss new working patterns with their manager, and we will offer a range of new working patterns within reduced opening hours including options to support religious observations.

Consultation did not identify any other impacts upon staff of different religions, and HMRC's assessment is that no further impacts are likely.

HMRC has also considered the potential for impacts in Northern Ireland upon people of different community backgrounds. HMRC does hold data on community backgrounds within Northern Ireland, but does not anticipate a disproportionate impact upon any particular community group. No issues relating to community background were raised during consultation.

Mitigating Action

- HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.
- HMRC will offer a range of new working patterns within reduced opening hours including options to support religious observations.
- HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager that arise because of their personal circumstances, in order to identify adverse impacts and mitigating action required.

6.9 Political Opinion (Northern Ireland only)

The responses to our consultation identified the following which may be additional impacts on political opinion (Northern Ireland only)

No issues specific to political opinion were raised during this consultation in respect of either staff or customers, and HMRC did not identify any potential impact upon persons of different political opinion.

6.10 Customers whose first language is not English

The responses to our consultation identified the following which may be additional impacts on those whose first language is not English.

Customers

HMRC does not collect data on the languages spoken by its customers, however it does offer translation services to customers who call its Contact Centres, and can identify calls where those services were used.

HMRC has analysed data gathered during the consultation process across Tax Credits, Self Assessment, and Child Benefit Helplines to establish whether a disproportionately large number of customers require translation services on Saturdays or Sundays. That analysis indicates that the total number of Sunday callers requiring translation services is low (less than 1% of all callers requiring translation services contact us on a Sunday). Those customers represent 1.2% of total callers on a Sunday, compared to 1.5% of total callers on a typical weekday.

This is consistent across the Tax Credits, Child Benefit and Self Assessment Helplines. It also shows that those callers represent a lower proportion of total callers on a Sunday – so there is no increased tendency to ring at the weekend among customers whose first language is not English.

Chart 8: May / June 2010 – Customer group requiring language translation weekday profile of calls

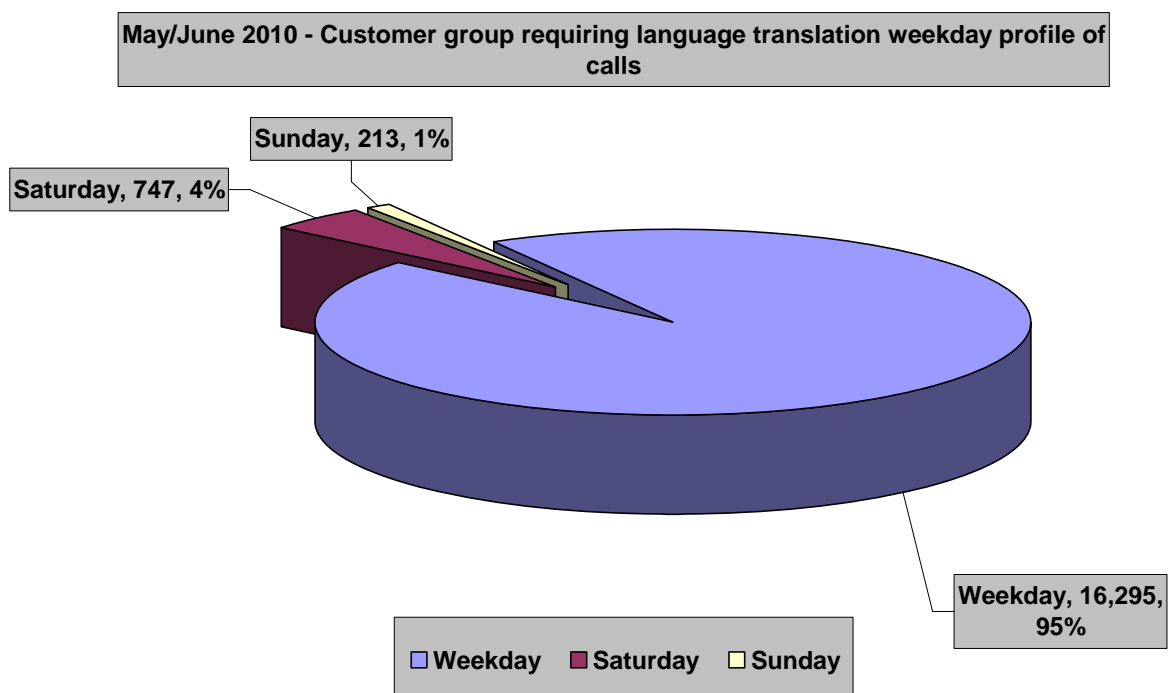
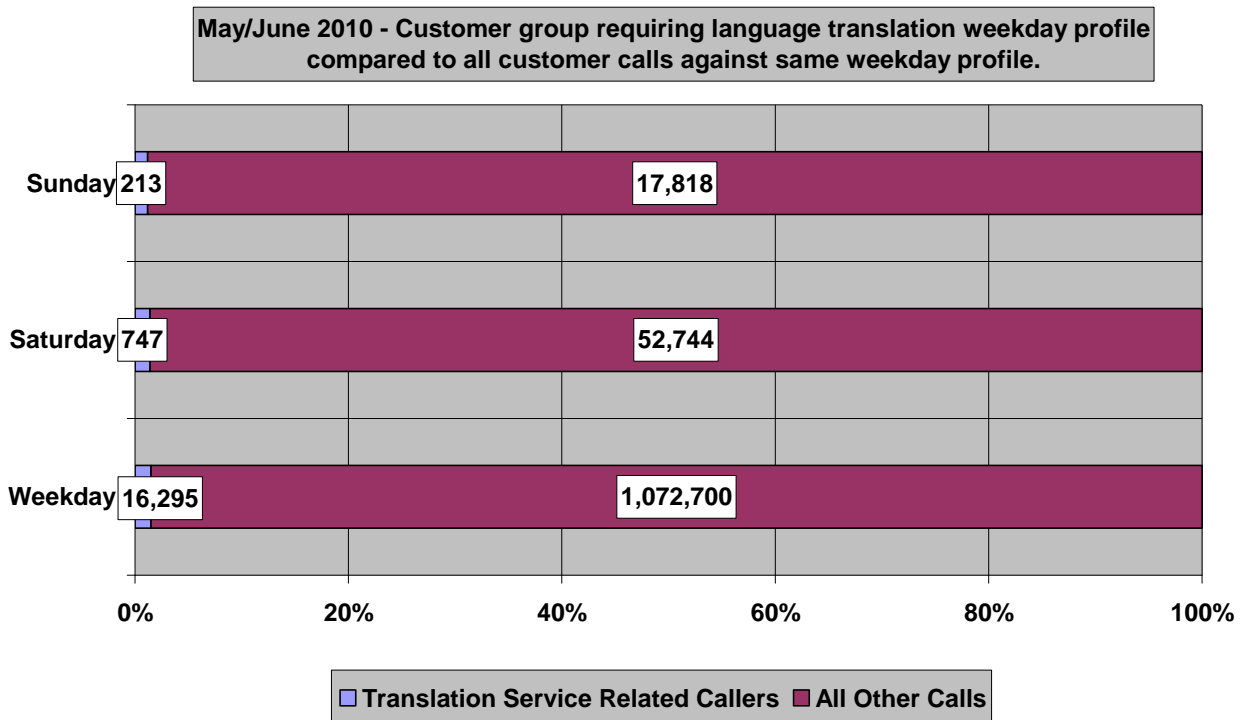


Chart 9: May / June 2010 - Customer group requiring language translation weekday profile compared to all customer calls against same weekday profile.



We are therefore satisfied that customers whose first language is not English do not call more frequently on Sundays than on other days, and will therefore not be impacted disproportionately by changes to Sunday opening hours.

Staff

We have not identified any specific impacts for Contact Centre employees, and no impacts were raised during the consultation process.

Mitigating Action

- HMRC is satisfied that the opening hours proposal meets the needs of customers who use different languages.
- HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.

Section 7: Action Plan

Action	Timing
Communicate	
HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.	By 30 November 2010
We will publicise changes to opening hours to allow customers impacted by the proposed changes to choose the most appropriate time to contact us.	From October onwards
We will bring changes to Contact Centre opening hours to the attention of HMRC Diversity Network Groups.	Ongoing
Engagement	
HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager and raise any impacts that arise because of their personal circumstances	Ongoing
Process (Internal)	
We will offer a range of new working patterns within reduced opening hours including options to support religious observations.	By mid October 2010
We will provide staff with four weeks' notice of changes to working patterns, rather than the contractually required two weeks, so that they have the opportunity to rearrange caring arrangements etc	By mid October 2010
We will continue to work to improve the staff completion rate of internal diversity data and will monitor the equality impacts arising as a result of implementing the changes. Adverse impacts will be identified through the discussions between managers and staff.	By November 2010
We will continue to give staff the opportunity to request family friendly working patterns, and will take reasonable steps to balance individual circumstances with business need when considering working pattern requests	Ongoing
Monitor	
We will monitor adverse impacts on persons of different ages through the discussions between managers and staff.	Ongoing
HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager and raise any impacts that arise because of their personal circumstances. Managers understand the need to handle these issues sensitively.	Ongoing

Appendix A: HMRC Glossary

Term	Definition
Contact Centres	HMRC's telephone call handling centres.
EQIA	<p>Equality Impact Assessment – EQIA is the process used to assess the potential adverse impacts on equality groups and identify ways to promote equality, fulfilling our commitments under the Public Duties and Northern Ireland Equality legislation.</p>
Equality Groups	<p>The equality groups are the groups of people that are protected by equality legislation. In Great Britain these are:</p> <ul style="list-style-type: none"> • Race • Disability • Gender (including transsexual people in respect of their gender reassignment) <p>As HMRC has a presence in Northern Ireland (NI) we also consider the equality groups covered by NI legislation in all of our EQIA work. The additional NI groups are:</p> <ul style="list-style-type: none"> • Age • Marital status • Sexual orientation • Religion or belief • Political opinion (consider in relation to Northern Ireland only) • People with or without dependants
HM Revenue & Customs (HMRC)	<p>HM Revenue & Customs was formed on 18 April 2005 following the integration of two former Departments – Inland Revenue and HM Customs and Excise.</p> <p>We collect the bulk of UK tax revenue; £435 billion in 2008/2009, and deal with over 40 million individual and</p>

	<p>corporate customers. We help to support millions of families and working people through the benefits and credits we administer; and we protect the country through our work at the frontiers.</p>
<p>Interactive Voice Response (IVR)</p>	<p>Telephone options available to channel customers to the correct advisor group, and to provide information through recorded messages.</p>
<p>Reasonable Adjustments</p>	<p>The Disability Discrimination Act (DDA) 1995 requires an employer to make “reasonable adjustments” for people covered by the DDA. HMRC has a responsibility to make adjustments in the workplace for any jobholder. This applies to physical features of premises occupied by the employer and to any provisions, criteria or practices made by or on behalf of the employer which cause a substantial disadvantage to a disabled person compared with a non-disabled person.</p>

Appendix B: List of External Organisations invited to comment during the consultation process

Name	Address Line 1	Town	Postcode	E-mail
Advice Northern Ireland	1 Rushfield Avenue	Belfast	BT7 3FP	bob@adviceni.net
Advice Services Alliance (NI)	1 Rushfield Avenue	Belfast	BT7 3FP	bob@adviceni.net
Age Concern Northern Ireland	3rd Floor	Belfast	BT1 6FD	info@ageconcernni.org.uk
Age UK	York House	London	N1 9UZ	mervyn.kohler@helptheaged.org
Age UK	Astral House	London	SW16 4ER	sally.west@ace.org.uk
Autism NI	Donard	Belfast	BT8 8BH	info@autismni.org
Barnado's	542-544 Upper Newtownards Road	Belfast	BT4 3HE	margaret.kelly@barnardos.org.uk
Cara-Friend Carers	Cathedral Buildings 58	Belfast	BT1 2GT	admin@cara-friend.org.uk
Northern Ireland Child Poverty Action Group	Howard Street 94 White Lion Street	Belfast	BT1 6PJ	helen@carersni.demon.co.uk
Childrens Law Centre	3rd Floor	Belfast	N1 9PF	kgreen@cpag.org.uk
Citizens Advice Bureau	3rd Floor	Belfast	BT15 1AB	info@childrenslawcentre.org Katie.lane@citizensadvice.org.uk ;
Citizens Advice Bureau	Myddelton House	London	N1 9LZ	Elizabeth.ladimeji@citizensadvice.org.uk
Citizens Advice Bureau (NI)	Citizens Advice Regional Office	Belfast	BT7 1BS	alcornd@citizensadvice.co.uk

Coalition on Sexual Orientation (CoSo) Committee	Cathedral Buildings	Belfast	BT1 2GT	admin@coso.org.uk
on the Administration of Justice Community Relations Council	45-47 Donegall Street	Belfast	BT1 2BR	tim@caj.org.uk
Council of Ethnic Minority Voluntary Sector Organisations	Glendinning House	Belfast	BT1 6DN	info@community-relations.org.uk
Credit Action	Boardman House	London	E15 1NG	hashmukh.pankhania@cemvo.org.uk
Derry Well Woman	6th Floor	London	WC1H 9LT	joannaparsley@creditation.org.uk
Disability Action	17 Queen Street	Derry	BT48 7EQ	info@derrywellwoman.org
East Belfast Community Development Agency	Portside Business Park	Belfast	BT3 9ED	hq@disabilityaction.org
Employers forum on Disability Equality Forum NI	269 Albertbridge Road	Belfast	BT5 4PY	info@ebcda.org
Falls Community Council	Banbridge Enterprise Centre c/o John Mason SEELB	Banbridge	BT32 3QD	info@efdni.org
FPA	275-277 Falls Road	Belfast	BT16 2HS	john.mason@seelb.org.uk
Gay and Lesbian Youth Northern	113 University Street	Belfast	BT12 6FD	fallscouncil@yahoo.com
			BT7 1HP	belfast@fpa.org.uk
			BT1 2GT	admin@glyni.org.uk

Ireland				
Gingerbread	255 Kentish Town Road	London	NW5 2LX	kate.bell@gingerbread.org.uk
Gingerbread Northern Ireland	169 Universit y Street	Belfast	BT7 1HR	enquiries@gingerbreadni.org
Help the Aged Northern Ireland	Ascot House	Belfast	BT2 7DB	helptheagedni@helptheaged.org.uk
Information Commissioner Law Centre (NI)	Wycliffe House	Cheshire	SK9 5AF	ni@ico.gsi.gov.uk
Legal Services	124 Donegall Street	Belfast	BT1 2GY	les.allamby@lawcentreni.org
Low Incomes Tax Reform Group	4 Abbey Orchard Street c/o The Chartered Institute of Taxation	London	SW1P 2BS	catriona.myerswilson@legalservices.gov.uk
Magherafelt Womens Group	The Learning Lodge	Magherafelt	BT45 6AG	thelearninglodge@yahoo.co.uk
Mencap (NI)	Segal House	Belfast	BT7 3JH	mencapni@mencap.org.uk
Multi- Cultural Resource Centre	9 Lower Crescent	Belfast	BT7 1NR	info@mcrc-ni.org
National Union of Students	NUS HQ	London	NW1 0DU	david.malcolm@nus.org.uk
Newry & Morne Women Ltd	Ballybot House	County Down	BT35 8BG	newwoman@globalnet.co.uk
Newtownabbey Senior Citizens Forum	The Barron Hall	Glengormley	BT36 7QX	nascf@btconnect.com
NIC-ICTU	4-6 Donegall	Belfast	BT1 2FN	info@ictuni.org

	Street Place				
North West Forum of People with Disabilities Northern Ireland Association for Mental Health Northern Ireland Council for Voluntary Action Northern Ireland Equality Commission Northern Ireland Statistics and Research Agency Northern Ireland Women's Aid Federation Northern Ireland Womens European Platform Northern Network of Travelling People	58 Strand Road	Derry	BT48 7AJ		northwestforum@utvinternet.com
	80 University Street	Belfast	BT7 1HE		a.ferguson@niamh.co.uk
	61 Duncairn Gardens	Belfast	BT15 2GB		seamus.mcaleavey@nicva.org
	Donal Collins	Belfast	BT2 7DP		information@equalityni.org
	McAuley House	Belfast	BT1 1SA		norman.caven@dfpni.gov.uk
	129 University Street	Belfast	BT7 1HP		info@niwaf.org
	58 Howard Street	Belfast	BT1 6PJ		niwep@btconnect.com
	c/o Leeds GATE	Leeds	LS9 0BD		winsford.enterprisecoaching@wincap.co.uk
NSPCC	Jennymount Court	Belfast	BT15 3HN		creid@nspcc.org.uk
NUS USI	The Student Movement NI	Belfast	BT2 7EJ		info@nistudents.org
Office of	Statutory	Belfast	BT4		claire.archbold@ofmdfmi.gov

the First Minister and Deputy First Minister Omagh Women's Area Network	Duty and Human Rights Department		3SG	uk
Press for Change	2nd Floor	Omagh	BT78 1DP	owen@btinternet.com
Queer Space	4 Glenside Road	Derry	BT48 0BW	brownar@eircom.net
RNIB NI	PO BOX 160 40	Belfast	BT1 2AU	queer_space@yahoo.com
Royal National Institute for Deaf People	Linenhall Street	Belfast	BT2 8BA	martin.walls@rnib.org.uk
Royal National Institute for Deaf People NI	19-23 Featherstone Street	London	EC1Y 8SL	keith.spencer@rnid.org.uk
Royal National Institute of Blind People	Wilton House	Belfast	BT1 6AR	information.nireland@rnid.org.uk
Rural Community Network	105 Judd Street	London	WC1H 9NE	sharon.palmer@rnib.org.uk
Scottish Accessible Information Forum	38a Oldtown Street	Co Tyrone	BT80 8EF	info@ruralcommunitynetwork.org
Stonewall	Royal Exchange House	Glasgow	G1 3DN	ben.forsyth@midlothian.gsx.gov.uk
Tax Aid	Tower Building Room 304	London	SE1 7NX	derek.munn@stonewall.org.uk
Tax Help for Older People	Pineapple Business Park	London	SE1 0LH	rosina@taxaid.org.uk
The Cedar Foundation	31 Ulsterville Avenue	Dorset	DT6 5DB	paddy.millard@taxvol.org.uk
		Belfast	BT9 7AS	info@cedar-foundation.org

Unison	Unit 4	Belfast	BT3 9JZ	p.mckeown@unison.co.uk
Women's Information Group Women's Resource and Development Agency	7 University Road	Belfast	BT7 1NA	women@infogroup.club24.co.uk
	6 Mount Charles	Belfast	BT7 1NZ	info@wrda.net
Women's Support Network	Downtown Women's Building	Belfast	BT1 1FF	co- ord@womenssupportnetwork.org
Youth Council for Northern Ireland	Forestview	County Antrim	BT8 7AR	info@youthcouncil-ni.org.uk

Appendix C: Summary of Comments Received and HMRC Response

Comment/Question	HMRC Response
1. People of different racial groups	
<ul style="list-style-type: none"> Possible disproportionate impact on BME staff, as no understanding of deployment of staff, and reasons for preferred working patterns 	<ul style="list-style-type: none"> Staff will be able to discuss their personal circumstances with managers when opting into a new shift pattern, and will be given at least four weeks' notice of changing work patterns to help them make any changes needed to their personal commitments.
2. Disability	
<ul style="list-style-type: none"> 418 staff (of 1337) have agreed specific shift patterns due to individual disability issues. Consultation does not address timescale and consistency to ensure equality for disabled staff affected by proposal, if individual managers assess risk and identify mitigating actions. If staff survey is used to assess impact, no clear timescale for monitoring, and staff survey is annual, so might not pick up quickly enough on impacts. Disabled staff may experience change in support networks, which is not addressed in the consultation document. Because of failure to understand and demonstrate Reasonable Adjustments made we would question how many of the 418 work patterns generated on grounds of reasonable adjustment could be impacted by this change. Potential disproportionate impact for those asking for reasonable adjustments, as changing the operational hours means restrictions on the days/times that disabled members can work to manage their life both in and out of work. 	<ul style="list-style-type: none"> Following consultation we will produce a suite of working patterns per line of business. If any disabled members of staff have any concerns we would look to review their concerns individually – this ensures that we can identify mitigations that fully address individual circumstances. HMRC remains committed to making 'reasonable adjustments' to support staff with a disability, as required by the Disability Discrimination Act. Staff will be able to raise their personal circumstances with their managers when opting into a new shift pattern, and will be given at least four weeks' notice of changing work patterns (compared to a contractual requirement of just two weeks) to help them make any necessary changes to care arrangements. Managers understand the need to handle these issues sensitively and reasonable solutions will be discussed. Guidance material will be provided for managers to have 1:1 discussions with their teams, to ensure that managers apply disability requirements fairly and consistently. Further advice and support will be available to managers from central HR teams during this process.

<ul style="list-style-type: none"> • Those with disabilities are a higher proportion of low income groups than in other ranges and that HMRC's disability equality performance has been disappointing. 	<ul style="list-style-type: none"> • HMRC will continue to work to improve the staff completion rate of internal diversity data and will monitor the equality impacts arising on racial groups as a result of implementing the changes. Adverse impacts will be identified through the discussions between managers and staff. • HMRC used data gathered during the consultation period to analyse demand profiles among customers receiving the disability element of Tax Credits. This analysis found customers with disabilities are no more likely to call on Sunday than any other day. 4% of all Tax Credit callers on a Sunday would fall into the people with a disability customer group compared to 3.4% of callers mid-week. This data has established that only 2% of this customer group call on Sundays. • We will publicise changes to opening hours to allow affected customers to choose the most appropriate time to contact us.
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3. Age

<ul style="list-style-type: none"> • Coding issues – greatly affected older people, Tax Help for Older People indicated pensioners hit hardest by issues, and inability to deal with calls. • Anecdotally, Contact Centres have many members both under 27 and over 50. A high proportion of those who regularly work Sundays are students, and most of these are young, therefore age discrimination may be an issue. Removing the weekend working could therefore disproportionately impact on these two groups, but as no data has been considered or provided by the department it is not clear on the level of impact and cannot be assumed to be no impact. 	<ul style="list-style-type: none"> • Additional research has been carried to assess the impact upon older age groups who require additional support throughout peak periods such as coding issues, PAYE etc. Research has found call volumes are significantly lower for older age people on a Sunday - see section 6 for full information. However, HMRC will revert to existing opening hours (including Sunday opening) during peak periods, including the issue of tax codes. • HMRC employ a number of students who may only be able to work weekends (while ages do vary, the majority of students are aged between 18 and 21). Staff will also be able to discuss alternative working patterns with their managers.
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	<ul style="list-style-type: none"> • HMRC will offer a range of working patterns and will work with individual members of staff to identify any impacts upon them from changes to Sunday hours, and to identify a suitable working pattern.
<p>4. Those with or without dependants</p>	
<ul style="list-style-type: none"> • Difficulties in making childcare arrangements, where one partner works on a Saturday or Sunday, the other partner probably stays at home to provide the childcare – so there are cost implications here over and above losing any premium payments they might have. There is no specific recognition of the fact that LGBT staff of both genders may have caring responsibilities and need the same amount of adjustments as others. • Some stereotyping assumptions around carers, that they are usually women but no statistical data is presented to support this assertion. • EQIA fails to appreciate that there are all sorts of care arrangements and needs, that some will be short term and others long term and they will not all fall into what one person assumes to be ‘normal’. • Carers may choose to work patterns to accommodate work life balance and may feel unduly pressured if they have to discuss areas of their life they have kept private with line manager. • If Contact Centres close some Saturdays when the systems are down, this could adversely affect carer’s leave. 	<ul style="list-style-type: none"> • Staff will be able to raise their personal circumstances with their managers when opting into a new shift pattern, and will be given at least four weeks’ notice of changing work patterns (compared to a contractual requirement of just two weeks) to help them make any necessary changes to care arrangements. HMRC will continue to offer staff the opportunity to request family friendly working arrangements, including part time working. • Staff will be able to discuss their personal circumstances with managers, allowing us to identify impacts and tailor mitigations at the individual level. • HMRC will continue to give staff the opportunity to request family friendly working patterns. That will include the ability to work part time, and those arrangements may be made for a short period (to cover short term caring responsibilities), or for a longer period. • Full guidance and support will provided to managers to ensure that all discussions are carried out in line with HMRC guidance and any legal requirements. • At least two weeks’ notice will be given for any change in working pattern because we planned to close on a Saturday due to planned system downtime.

<ul style="list-style-type: none"> • How will family friendly working patterns including Sundays be accommodated? These are legally binding and last 12 months, would CCD wait for them to end and then change them? What if members unable to make up their hours at other times during the week? If CC's closed when the systems are down. What would happen to people on fixed Family Friendly or DDA shifts? Will they be forced to take annual leave for these days and if so that will then put them at a disadvantage in having less leave than everyone else? 	<ul style="list-style-type: none"> • If a HMRC staff member's current working pattern includes periods where we will be closed they will need to change their working pattern. All staff will be given the opportunity to discuss their personal circumstances with managers. Once the revised opening hours have been implemented, staff will be required to work to a pattern that falls within HMRC's CC opening hours. Staff will be able to discuss their personal circumstances with managers when opting into a new shift pattern, and will be given at least 4 weeks' notice of changing work patterns to help them make any changes needed to their personal commitments. We will take all reasonable and practical steps to find alternatives to meet staff's personal circumstances as well as the needs of the business.
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5. Sexual Orientation

<ul style="list-style-type: none"> • Restricting hours for staff may mean transgender members unable to make medical appointments, which they would arrange their working life around. • Changes may mean staff have to make arrangements for travelling to and from work that are less safe. Anecdotally, Lesbian, Gay, Bisexual and Transgender staff are more likely to work in Contact Centre's, and may tend to work in groups, and travel together to minimise any risks that could arise when travelling alone (homophobic and gender specific attacks on public transport, such as at night or early mornings) which will only occur because of the loss of the choice of working days. • EQIA states discussions will be held with line managers. Unauthorised disclosure of a person's Transgender status has a substantial financial penalty on the individual; it is to be hoped that HMRC will not place front line managers in position where they are forced to break this law. 	<ul style="list-style-type: none"> • Staff will be able to discuss their personal circumstances with managers when opting into a new shift pattern, and will be given at least four weeks' notice of changing work patterns to help them make any changes needed to their personal commitments. Changes to opening hours will not result in staff travelling home later than they currently do. We will continue to maintain current arrangements for requesting leave to meet personal commitments. • Full guidance and support will provided to managers to ensure that all discussions are carried out in line with HMRC guidance and any legal requirements.
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- It is very difficult to assess fully the impact changing opening hours might have on a transgender person and it will be important for management involved in one to one discussions to advertise complete confidentiality.
- Customers – transgender people may be less likely to use F2F and Telephone channels for fear of insensitive treatment. Online channels would be preferable, but not possible as HMRC treat transgender people's records as 'sensitive cases'. This also draws attention to customer's records.
- No data for CCD diversity declarations.
- Section on carers excludes any understanding that the term 'family' poorly services co-dependence arrangements and how care arrangements that LGB (and T) people build for themselves and for others that they care for go beyond the nuclear family. LGB (and T) people can be parents as well as children, may have care responsibilities for current and former partners, may be a linking point or focus for the care needs or arrangements for people with whom there is no clearly defined relationship as HMRC understands it, which doesn't make it wrong or of lesser value. The absence of data presented for this does not mean that there is no impact.

- The guidance for managers and staff will be clear about the confidential nature of the discussions.
- The changes in Contact Centre opening hours will have no impact on the availability of online channels.
- The Contact Centre Opening Hours Consultation document included a chapter regarding 'Evidence Considered, Impacts Assessed, Mitigating Action'. This section covered diversity data in respect of the following groups: Racial Groups, Disabled and Non-Disabled People, Gender, Age, Marital status, those with or without dependants, sexual orientation, religious belief, language and political opinion.
- HMRC will treat all circumstances on a personal basis. The Department does not hold statistical data for those staff who are carers and the gender of those who have caring responsibilities. However, staff will be able to discuss their personal circumstances with managers when opting into a new shift pattern, and will be given at least four weeks' notice of changing work patterns to help them make any changes needed to their personal commitments.

<ul style="list-style-type: none"> • Dataset provided shows only 59% of LGB people are 'out' to their manager. 41% of LGB staff may not feel comfortable discussing requirements relating to sexual orientation in one-to-one meeting, as set out in EQIA. 	<ul style="list-style-type: none"> • The guidance for managers and staff will advertise the confidential nature of the discussions. Staff will have the opportunity to discuss their personal circumstances in a confidential basis and environment. • We will take all reasonable and practical steps to find alternatives to meet staff's personal circumstances as well as the needs of the business.
<p>6. Religion or Belief</p>	
<ul style="list-style-type: none"> • Early closure would affect observant Jews, when observing the Sabbath on Saturday, and would therefore call after sunset, or on Sunday. • Particularly on Tax Credit Help Line there have been many Muslim members who have specifically opted to work a Sunday to Thursday fixed pattern to be able to make religious observation on Fridays. Christian members have been refused similar considerations to make religious observations on Sundays, Good Friday etc. 	<ul style="list-style-type: none"> • HMRC accepts the potential for impacts upon persons of Jewish faith, and will therefore mitigate those impacts by publicising changes to opening hours to allow affected customers to choose the most appropriate time to contact us. The proposed hours are consistent with those of many other Government Departments and commercial organisations. • The proposed hours are consistent with those of many other Government Departments and commercial organisations, so we will publicise changes to opening hours to allow affected customers to choose the most appropriate time to contact us. Some Muslim members of staff have chosen to work between Sunday and Thursday to enable them to make religious observance on Fridays. These members of staff will be able to discuss this with their manager, and we will offer a range of new working patterns within reduced opening hours including options to support religious observations.

7. Language

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| <ul style="list-style-type: none">• HMRC have been particularly ineffective at reaching customers whose first language is not English.• Department's telephone interpreting supplier operates outside HMRC CC opening hours already, no data provided to assess impact on these customers.• The Welsh Language line already operates hours that are more restricted than many lines of business operated by HMRC. | <ul style="list-style-type: none">• HMRC provides customers with a language translation service via telephone when they contact the Department's Contact Centres. This service is provided for customers who do not speak English as their first language.• Additional research has been conducted (section 6) which concludes the department receives a significantly lower volume of calls (less than 1%) to our translation provider on a Sunday compared to an average weekday. These customers represent 1.2% of total callers on a Sunday compared to 1.5% of total callers on a typical weekday.• The Welsh Language line is open Monday to Friday, 8.30am to 5.00pm, and is closed weekends and bank holidays. This falls in line with HMRC's proposed opening hours. |
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Appendix D: Mitigating Action

Equality Group	Mitigating Action	Status
Communication		
Racial Groups Disabled and Non Disabled Age Those with or without Dependants Sexual orientation Religion / Belief Language	HMRC will actively communicate any impending changes for customers using Enquiry Centres, Online Services and automated messaging to advise customers who call of the revised opening hours.	Ongoing
Racial Groups	HMRC will give consideration to the Ethnic make up of the population to determine the most suitable methods to communicate to customers.	Ongoing
Disabled and Non Disabled	We will publicise changes to opening hours to allow customers impacted by the proposed changes to choose the most appropriate time to contact us.	Ongoing
Language	Additional research conducted confirmed that this proposal shouldn't impact on the needs of customers who use different languages.	Completed
Racial Groups Age Those with and without Dependants Sexual Orientation	We will bring changes to Contact Centre opening hours to the attention of HMRC Diversity Network Groups.	Ongoing

Equality Group	Mitigating Action	Status
Employee Mitigation		
Racial Groups Disabled and Non Disabled Age Marital Status Those with or without Dependants Sexual Orientation Religious Belief Language	HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager and raise any impacts that arise because of their personal circumstances. Managers will work with staff to identify a working pattern that balances personal circumstances with business needs.	Ongoing
Religious Belief	We will offer a range of new working patterns within reduced opening hours including options to support religious observations.	Ongoing
Disabled and Non Disabled Those with or Without Dependants	We will provide staff with four weeks' notice of changes to working patterns, rather than the contractually required two weeks, so that they have the opportunity to rearrange caring arrangements etc.	Ongoing
Disabled and Non Disabled	We will continue to work to improve the staff completion rate of internal diversity data and will monitor the equality impacts arising a result of implementing the changes. Adverse impacts will be identified through the discussions between managers and staff.	Ongoing
Racial Groups	Any issues relating to specific racial groups raised during the staff consultation process will be addressed.	Ongoing
Those with or Without Dependants	We will continue to give staff the opportunity to request family friendly working patterns, and will take reasonable steps to balance individual circumstances with business need when considering working pattern requests.	Ongoing

Equality Group	Mitigating Action	Status
Monitoring		
Age	We will monitor adverse impacts on persons of different ages through the discussions between managers and staff.	Ongoing
Sexual Orientation	HMRC staff affected by changes to working patterns will have the opportunity to discuss changes to those working patterns during 1:1 discussions with their manager and raise any impacts that arise because of their personal circumstances. Managers understand the need to handle these issues sensitively.	Ongoing
Marital Status	We will monitor adverse impacts on persons of different marital status through the discussions between managers and staff, the grievance process and the appeals process within the Regional Review Programme.	Ongoing

Appendix E - Customer survey feedback

Background

To help assess the impacts of changes upon our customers, we conducted a survey among those callers ringing Liverpool and Manchester Contact Centres on Sundays.

The survey was intended to assess whether Sunday closure would create significant problems for our customers. It therefore asked:

1. Whether customers would be able to call on a different day.
2. For those customers saying they could call on another day, the survey asked when they would choose to call.
3. For those customers saying they could not call on another day, the survey asked whether that was attributable to work or personal commitments.

In addition, the survey provided customers with an opportunity to leave a recorded message providing any further information that they thought would be helpful.

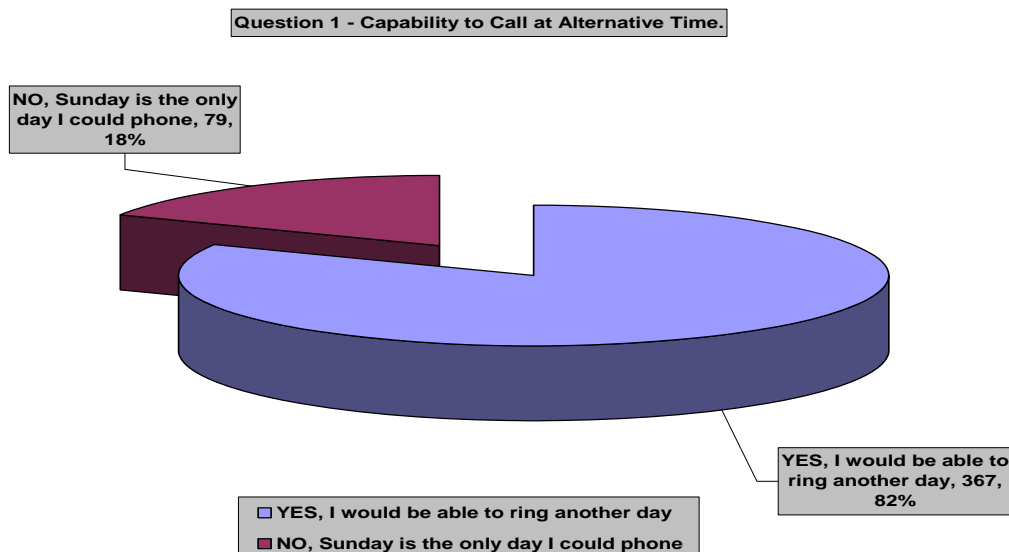
The questionnaire ran each Sunday from 8th August 2010 in both Contact Centres, with around 10% of callers agreeing to participate.

Survey results

Question 1 - ability to call on another day

This question asks Sunday callers if they could make their call at any alternative time in the week. The responses available for this question are:

1. **Yes, I can call another day.**
2. **No, I can only call on a Sunday.**

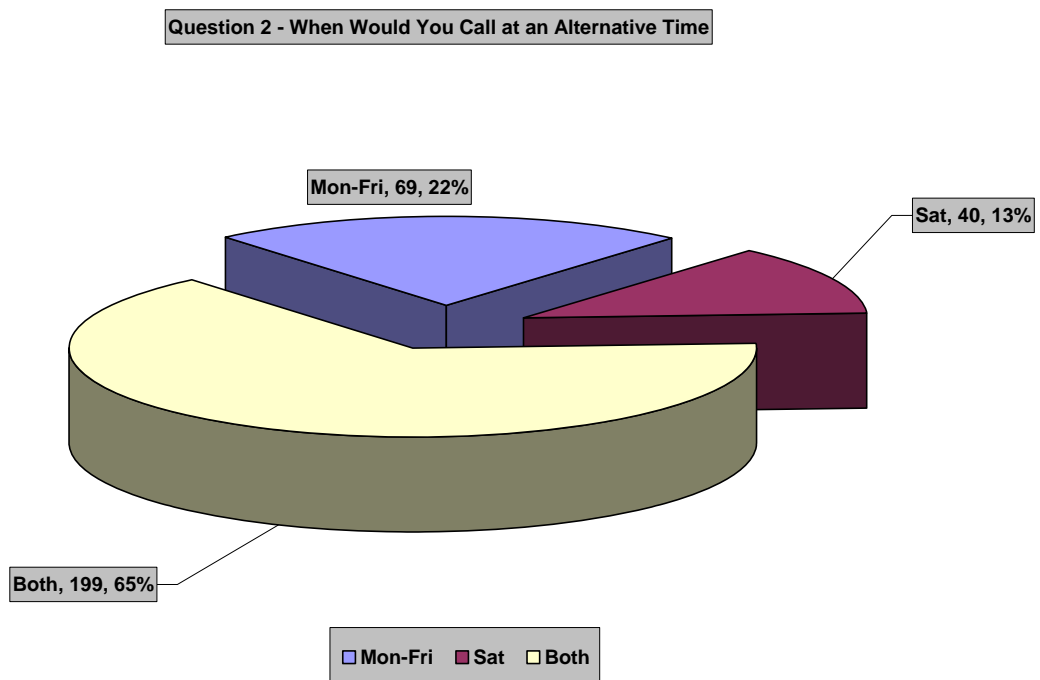


Responses indicated that a significant majority of customers (82%) will be able to call on another day without any difficulty.

Question 2 - which other days customers can use to call

This question asks Sunday callers when they could make their call if not on a Sunday. The responses available for this question are:

1. Monday – Friday.
2. Saturday.
3. Both Monday – Friday and Saturday.

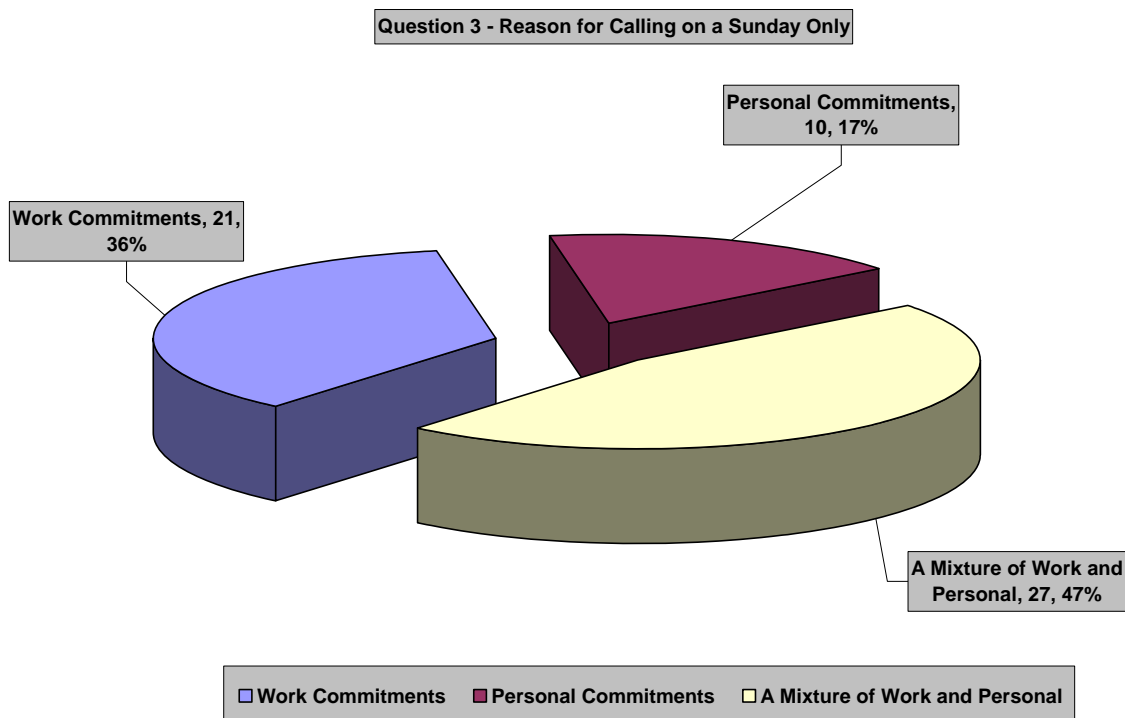


Responses indicate a good degree of flexibility among customers, with a small majority not subject to any restrictions about when they call (65%). Only a small proportion of customers (13%) are limited to Saturdays, with many customers therefore likely to call during the week, when we will be deploying a larger number of advisers following changes to opening hours.

Question 3 - Reason for Calling on a Sunday.

This question asks Sunday callers why they make their call on a Sunday. The responses available for this question are:

1. **Work Commitments.**
2. **Personal Commitments.**
3. **A Mixture of Work and Personal Commitments.**



Results of the recorded messages left by customers

All customers were invited to leave a recorded message at the end of the survey, to further explain their answers or provide additional information. Of the customers who left messages, 76% of those who had said they could only call on a Sunday explained that this was because they could not get through to HMRC on busier days - a situation that these proposals will help to address.

Appendix F – Revised Opening Hours Time

HELPLINE	CURRENT OPENING TIMES		PROPOSED HRS	CHANGES
BillPay Helpline (DMB)	8.00am to 5.00pm	Monday to Friday	No Change	
Blind Persons Allowance priority line (RNIB) (D/W at Manchester only)	8.00am to 8.00pm 8.00am to 4.00pm	Monday to Friday Saturday	No Change	
CCD online - income tax / Online Services Tax Credit helpdesk	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Child Benefit Helpline	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Child Trust Fund	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Construction Industry Scheme (CIS)	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Contracted Out Pensions Helpline (COPH) Adjudicator	8.00am to 5.00pm	Monday to Friday	8.30am to 5.00pm Mon - Fri	1. Monday to Friday opening hours change from 8am to 8.30am
Deficiency Notice (Queries from customers who have received a letter regarding shortfalls in their national insurance records)	8.00am to 8.00pm 8.00am to 4.00pm	Monday to Friday Saturday	8.30am to 5.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Monday to Friday opening hours change from 8am to 8.30am and closing hours change from 8pm to 5pm
E Customer Support (ECS) Helpline	8.00am to 8.00pm	Monday to Friday	8.00am to 6.00pm Mon - Fri	1. Monday to Friday closing hours change from 8pm to 6pm
Employer (EHL)/New Employer Helpline (Advice on PAYE, NIC, statutory sick pay, maternity pay, Tax Credits, stakeholder	8.00am to 8.00pm 8.00am to 5.00pm Sunday	Monday to Friday Saturday and	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 5pm to 4pm 2. Closed on Sunday

pensions, student loan repayments)				
Health in Pregnancy Grant (HiPG)	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
National Insurance Employees and Individuals	8:00am to 5:00pm	Monday to Friday	No Change	
National Insurance: Contracted out pensions	8.00am to 5.00pm	Monday to Friday	No Change	
National Insurance: Newly Self-Employed	8.00am to 8.00pm 8.00am to 4.00pm Sunday	Monday to Friday Saturday and	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Closed on Sunday
National Insurance: Registrations Non-Resident	8.00am to 5.00pm	Monday to Friday	8.30am to 5.00pm Mon - Fri	1. Monday to Friday opening hours change from 8am to 8.30am
Orderline – for requesting leaflets, forms, guides etc. (NTC, SA, Stamps)	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Retirement Annuity Contracts	8.30am to 8.00pm 8.00am to 4.00pm	Monday to Friday Saturday	No Change	
Self Assessment Payment Line (Debit Card)	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Self Employed Contact Centre(SECC)	8.00am to 5.00pm	Monday to Friday	8.30am to 5.00pm Mon - Fri	1. Monday to Friday opening hours change from 8am to 8.30am
Stamp Taxes	8.30am to 5.00pm	Monday to Friday	No Change	
Tax Credits	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Tax Credits: Household Breakdown/ TC610	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
Tax Credit Overpayment Helpline	8.00am to 8.00pm	7 days a week	8.00am to 8.00pm Mon - Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday

Tax and Benefits Confidential	8.30am to 5.00pm	Monday to Friday	No Change	
Tax enquiries – Centre for Non Residents (CHR)	8.00am to 5.00pm	Monday to Friday	No Change	
Taxes	8.00am to 8.00pm 8.00am to 4.00pm	Monday to Friday Saturday	No Change	
Taxes (Payment Enquiry Line) – Debt Management and Banking (DMB)	8.00am to 8.00pm 8.00am to 4.00pm	Monday to Friday Saturday	No Change	
Taxes – Self Assessment Helpline	8.00am to 8.00pm	7 days per week	8.00am to 8.00pm Mon – Fri 8.00am to 4.00pm Sat	1. Saturday closing hours change from 8pm to 4pm 2. Closed on Sunday
VAT, Excise & Customs Helpline (EXC)	8.00am to 8.00pm	Monday to Friday	8.00am to 6.00pm Mon – Fri	1. Monday to Friday closing hours change from 8pm to 6pm
Welsh Contact Centre (Covering all former Inland Revenue related matters)	8.30am to 5.00pm	Monday to Friday	No Change	

Appendix G: Non equality impacts from the proposed changes

As part of the EQIA consultation we received feedback / comments that, while offering helpful feedback around changing opening hours, did not strictly relate to equality impacts. Although these concerns are outside the remit of the EQIA, for completeness we have set them out below along with the HMRC response.

Feedback / Comment	HMRC Response
<p>Several consultation responses proposed promoting Sunday opening to encourage higher volumes of contact</p>	
<p>No thought of improving customer satisfaction through promoting Sunday opening, promoting the ease of access of online services and therefore spreading the load more evenly.</p> <p>Many people are unaware that Contact Centres are open on weekends, should promote this rather than remove facility.</p> <p>Customers not aware of weekend opening, this was not linked in the EQIA to reduced demand on those days – instead EQIA concludes that as call volumes are low, demand is low and lines should be closed. Weekends are convenient for those working during the week.</p>	<ul style="list-style-type: none"> • HMRC has considered the potential for greater advertising in an attempt to increase the number of customers who call on a Sunday. However, the Department considers that this approach would be less effective than moving our resources to the periods when most customers want to contact us. It is likely to be more cost-effective, and provide improved customer service, to raise performance by matching resource to customer demand than by spending money on trying to change customer demand patterns to suit our resource deployment. HMRC continues to promote online service delivery, and has a wide range of online services, forms, and guidance available on the Web. Take up of online services continues to grow, and HMRC aims to maintain this trend. However, we also recognise that there will always be customers who need to speak to us, and these proposals aim to ensure that a higher proportion of those customers can get through to us when they need help. • HMRC will extend opening hours back to current levels (including Sundays) during peak periods to meet demand. The proposed hours are consistent with those of many other Government Departments and commercial organisations and we will publicise changes to opening hours to allow affected customers to choose the most appropriate time to contact us.

Several consultation responses suggested that low income customers may often use Sundays to sort out financial problems, and that they may therefore be disproportionately impacted by Sunday closure.

Believe that this reduction in front-line services is strategically unsound, contrary to the principles of Your Charter and discriminatory against those on the lowest incomes who are in need of the greatest support. Sunday is a “sort out financial problems” day for many low-income people, who work long hours on minimum wage rates

Tax Credit customers who are on low incomes and can't afford to contact a helpline which will not be open. This is wasting money and for the poorest in society this is an issue that must be addressed and for the same reason it may also be the case that our customers may not have access to the internet. The internet is a great medium if you can afford it and are able to use it.

If callers cannot get through to HMRC's helplines, they can lose out financially, and may for example incur tax credit overpayments or tax penalties. Adequate HMRC support is vital.

Cost of wasted call attempts impacts most severely on mobile phone users, more likely to come from low-income minority groups.

- HMRC has analysed additional data gathered during the consultation period to identify caller demand profiles among those customers receiving the highest award of Tax Credits - a key indicator of low income customers. This data shows that a small volume of low income callers ring on Sundays (in the same proportions as other days of the week), and totals approximately 1%. We therefore consider that changes to Sunday opening hours will not impact disproportionately upon this customer group. HMRC concludes that low income customers are not disproportionate users of Contact Centres on either Saturdays or Sundays, and will not therefore be impacted by changes to opening hours to any greater degree than other customers. They will also benefit from the increased accessibility delivered by these changes (estimated at an extra 3% of call attempts answered every year) to the same extent as all other customer groups. The proposed hours are consistent with those of many other Government Departments and commercial organisations and we will publicise changes to opening hours to allow affected customers to choose the most appropriate time to contact us.
- HMRC is not able to obtain data on customers who are unable to contact the Department. However, we have carried out data analysis on 'peak' and 'non peak' periods, so we have a comparative of data for when customers are more likely to get through straight away to an adviser. See section 6 for full details.
- HMRC recognises the importance of customers being able to access advice through its helplines. The proposed changes will allow us to answer an additional 3% of call attempts, meaning an extra 1.7m people will get through to us when they call.

<p>Cost of 0845 numbers – may mean those on low incomes disproportionately affected. HMRC should make geographical numbers available by LOB.</p>	<ul style="list-style-type: none"> • HMRC recognises that the cost of calling can be an issue for some customers. HMRC predicts that the proposed changes will allow us to answer an additional 3% of call attempts (1.7m calls) each year, reducing the number of times low income customers have to ring before they succeed in getting through. HMRC is currently in the process of carrying out an in depth review of its numbering strategy to consider a range of options that balance costs to the customer, costs to HMRC, Contact Centre performance and accessibility.
<p>One consultation response suggested that Sunday closure and reduced hours on Saturdays may impact on those customers (typically PAYE employees) unable to contact HMRC during normal working hours for reasons of privacy.</p>	<ul style="list-style-type: none"> • Existing low caller levels on both Saturdays and Sundays do not indicate that there is significant demand from customers unable to contact HMRC during the week. Data gathered through a customer survey suggests that 82% of customers who currently call on a Sunday will have no difficulty in calling on another day of the week. Of those customers who said that they could not call on another day, 50% cited work commitments as the reason, with a further 33% citing a combination of work and personal commitments. When provided with an opportunity to provide more information about their answers, however, many of these customers said that they call on Sunday because it can be difficult to get through to HMRC Contact Centres on other days of the week. This is a situation that will be alleviated for all customers by changes to opening hours, which will allow HMRC to answer an estimated additional 3% of call attempts (around 1.7m calls) every year. • HMRC therefore considers that the majority of customers will not find it difficult to adapt to changes in opening hours. In considering the impacts on customers from these changes, HMRC was mindful of the fact that the proposed hours are consistent with those of many other Government Departments (including the Department for Work and Pensions). HMRC therefore considers that any adverse impact from Sunday closure will be small, and is proportionate to the service improvements that will be delivered as a result of answering an additional 3% of call attempts.

One consultation response highlighted that customers receiving “alarming” communications from HMRC would have to wait until later in the week before being able to make contact. By continuing to open at weekends, HMRC could therefore reduce unnecessary worry.

- As there are no postal deliveries on a Sunday, and HMRC will continue to open on Saturday between 08.00 and 16.00, the Department anticipates that any adverse impact will be small. HMRC will mitigate this by directing customers to the HMRC Internet site for guidance, and by using advisory recorded messages when closed that tell customers when they can call back.

A number of staff comments also addressed the question of support to online filers.

Taxpayers who file online have benefit of Electronic Business Unit, no help available will leave them stranded, frustrated at not being able to complete their transaction

Online filers cross check information held on record when there is a discrepancy. System won't allow taxpayer to file until record is updated.

The advice online is now so comprehensive that many customers could get an answer to their questions from our website. With the current economic climate I question whether we can continue offering a Sunday service when call volume is usually so low. I appreciate that at peak times we can be relatively busy on a Sunday, the opening hours during the rest of the week should be sufficient to meet demand. It's time both HMRC and its customers adapted to reasonable change.

Closure sends the message that customers cannot access HMRC for online help and support on a Sunday, which must be contrary to HMRC objectives.

- Peak usage of online services coincides with peak periods of Contact Centre demand (generally around filing deadlines and similar), and so our proposal to extend opening hours back to current levels during peaks will help to mitigate this impact. We will also explore the potential for putting extra advice online for customers who are having difficulty using online services.
- HMRC will continue to provide a service on a Sunday during peak periods to meet demand. Continuous improvements are being made to HMRC's website to make information easy and accessible for our customers to obtain advice and information.

A number of comments focussed on customers who find it convenient to call on Sundays:	
<p>SA helpline founded to assist taxpayers to cope with the regime at times of their convenience.</p> <p>Agents make enquiries on Sundays.</p> <p>In current economic climate, tax payers more willing to do own return to keep costs down - often show appreciation by commenting about help being available on Sundays.</p>	<ul style="list-style-type: none"> • HMRC will continue to provide a service on a Sunday during peak periods to meet demand. Although the majority of Sunday callers have said that they would be able to ring on another day, HMRC recognises these changes will inconvenience a small number who prefer to ring on a Sunday. We consider, however, that the benefits to the majority from answering an additional 3% of call attempts outweigh those impacts. We will publicise changes to opening hours to allow affected customers to choose the most appropriate time to contact us
<p>It was suggested that management rationale for Sunday closure is the low demand compared with resource utilisation. Not so in the case of the SA helpline. Productivity per head actually higher than during the week, advisors handling around 50 calls per shift, between 70 and 100 calls during peaks.</p>	<ul style="list-style-type: none"> • We acknowledge that productivity can fluctuate due to various reasons and many factors should be taken into account when comparing productivity levels. By changing Contact Centre opening hours we will provide benefits to the majority from answering an additional 3% of call attempts - outweighing those impacts. We will publicise changes to opening hours to allow affected customers to choose the most appropriate time for them to contact us.
<p>It was commented that IT/Telephony upgrades which are released over the weekend may require testing before the following Monday.</p>	<ul style="list-style-type: none"> • Robust arrangements are in place to test IT / Telephony upgrades before they go live. This testing happens outside the live service delivery environment, and so weekend working within Contact Centres is not a part of that testing process.
<p>Staff under-utilised during weekends, shows lack of training and flexibility. Staff could answer e-mail enquiries. Solving utilisation problem might lead to different conclusion.</p>	<ul style="list-style-type: none"> • We already schedule an element of training at weekends and email enquiries for those lines of business which we service. We know that our customers can currently find it very hard to get through to our Contact Centres. Finding new types of work for staff to do on a Sunday would not help address that problem, whereas the proposed changes will allow us to answer an additional 3% of call attempts – that’s another 1.7m people who will be able to get through to us, who wouldn’t be able to if we found other ways of utilising advisers when the phones are quiet on Sundays.

<p>It was suggested that opening hours should meet demand and welcomed any actions to increase calls answered/decrease waiting times. Most. Accountants/Agents will want to call during office hours – easier for them, reduces cost for their clients.</p> <p>Another consultation response suggested that many taxpayers may want to contact outside office hours.</p> <p>SA, TC, and DMB should remain open on Sunday, for at least part of the day.</p>	<ul style="list-style-type: none"> • By closing Contact Centres on Sundays, weekday productivity will be improved by deploying our staff at the right times and in the right places to meet customer demand. HMRC will answer an additional 3% of call attempts, making it easier for 1.7m customers to get through to us the first time they call. Customers will also be able to obtain departmental advice and information outside of office hours via the HMRC website. • Call demand profiles are much lower outside of office hours. The new opening hours for HMRC are consistent with other Government Departments. For example DWP and Pensions Credits Helpline. • Call demand profiles on the specified lines mirror those on other lines, with much reduced demand on Sundays. Self Assessment (which is combined with PAYE Taxes in our Contact Centres) and Tax Credits represent our largest lines of business, and therefore offer the greatest potential for redeploying advisers into busier periods. Including these lines within the proposals is therefore central to delivering the benefit of an estimated additional 3% call attempts answered. •
<p>It was commented that VAT Contact Centres plan to reduce opening hours to 5pm on weekdays would adversely affect those running own businesses, many would want to call outside normal office hours.</p>	<ul style="list-style-type: none"> • Demand profiles were reviewed and supported the view that there was sufficient demand between the hours of 5pm and 6pm to merit opening. As a result of the review the proposed opening hours for the VAT line have been amended. (See Appendix F).
<p>It was questioned if it would be more beneficial to have Saturday opening hours 9am – 5pm rather than 8am – 4pm?</p>	<ul style="list-style-type: none"> • The proposed hours are based upon analysis of demand by half hour across each line of business. The proposed hours represent the best match between adviser availability and customer demand profiles.

<p>It was suggested that temporary extensions of hours e.g. during peaks should be better publicised as not all customers will check website.</p>	<ul style="list-style-type: none"> • During peak periods, HMRC will update the HMRC website to advise of our new opening hours for peak periods, and will also be investigating other methods of publicising our peak opening hours through recorded messages in our Contact Centres, and the leaflets & written correspondence the department sends to customers.
<p>It was stated that many customers would prefer to communicate by e-mail, particularly business.</p>	<ul style="list-style-type: none"> • The proposals around Contact Centre opening hours are not linked to the availability of service to allow customers to contact us directly by e-mail.
<p>Tax credit emergency payments there are no negative impacts concluded. This is because any customer who contacts us currently at the weekend to request an emergency payment is not dealt with until a Monday morning. Consideration should be given to the process of how that actually happens. Staff working weekends process referrals to that department over the weekend ready to be picked up.</p> <p>There is a potential that call volumes may increase on a Monday, increased workload will need to be processed in a shorter period putting additional pressure on contact centres and those in departments dealing with emergency payments. Will they be able to get through the work before 3pm? If not the payment will not reach them until the day after next.</p>	<ul style="list-style-type: none"> • Customers who contact HMRC's Contact Centres to submit a request for a Tax Credit emergency payment are referred to the department's National Payments Team who are available Monday to Friday 8.30am – 5.00 pm. The National Payments team then contact the customer and assess entitlement to an emergency payment, for midweek referrals this is generally on the same day. Where a payment is appropriate arrangements are made to issue a payment via the postal service and in the vast majority of cases payment is guaranteed by 1.00pm the following day. Changes to Contact Centre opening hours therefore will not adversely impact the timescales in which these requests are handled. The changes to opening hours will be implemented with the aim of answering additional call volumes during busy periods of the week. • Currently the demand on a Sunday from these customers does not match this statement. 82% of those customers who currently call on a Sunday say they will be able to call on another day. Of those who said they couldn't call on another day, many said this was because they struggled to get through during the week.

Customers working only weekdays and the self employed will be inconvenienced and disadvantaged by the withdrawal of the Sunday service. These people are busy generating taxable income during the week and the weekend is often the only time they have to set aside to manage their affairs.

A number of comments were received regarding staff and working patterns:

Takes away flexibility of working hours, reduced pay which will create financial hardships and impact on employees' quality of life, Employees may need to find additional income, be forced to leave HMRC, lose experience staff and may need to recruit Agency staff resulting in poor customer service. The benefits might be better work/life balance with employees having more quality time with the families and friends.

Closing hours on a Saturday - believe this would make the operational day shorter than a standard day (i.e. 7.5 hours) in most rotational shift cases. The impact of this will be staff losing time worked and/or staff taking shorter lunches to make up for this deficit. This may have health implications for an already stressed workforce. This is very concerning especially given the proportion of stress related sickness absence recorded by the department. Central/Local Resources Teams may also be affected by having to rescheduling lunches.

- Staff will be able to raise their personal circumstances with their managers when opting into a new shift pattern, and will be given at least 4 weeks' notice of changing work patterns (compared to a contractual requirement of just 2 weeks) to help them make any necessary changes to care arrangements.

- Yes to a certain extent, however full time staff have always had a shorter day to accommodate the 42 hour working week, so any issues would be dealt as they are under current guidelines. A range of revised working patterns are being designed, with staff consultation, and these patterns will take into account the shorter opening hours on a Saturday.

Staff's "annual leave" entitlement was queried when determining opening times i.e. Christmas, Easter, etc; when in the year will this be identified? Without knowing this, how are we to determine any Equality Impact on the planning for Christmas operations? The same considerations could be demonstrated for business spikes (i.e. SA spikes, TC spikes, PAYE spikes).

Sunday working isn't compatible with family life. The benefit to me far outweighs the relatively small sacrifice I would need to make in terms of salary.

The document says that the proposals will lead to an improved service for the overall customer base, but how many of the staff who work Sunday also work Monday? The highest calls spike each week is on a Monday, and if the Sunday staff already work then, the impact may not be as positive as expected?

- We will determine the opening times as early as is practically possible. Staff will be allocated shifts during those opening hours according to existing processes. Opening hours at these times will be no longer than standard opening hours.
- This comment suggests that the proposed changes will be beneficial to staff with dependents. The comment is correct that the new opening hours will remove a requirement for staff to work Sundays apart from at peak times of the year when we will extend opening hours back to current levels.
- The majority of staff who currently work Sundays will also be working Monday as we do not generally have Mondays as a rota day off (RDO). However as a result of the change of opening hours we will still be improving the service by scheduling those staff into another day in the week where there is a business requirement. The 3% increase in call attempts answered that we have modelled allows for this.

Several responses commented on the EQIA Methodology:

EQIA Document contains errors, contradictions, and unsupported assertions.

Evidence not published, not clear how conclusions have been made.

If EQIA confirms disproportionately adverse effect on certain groups, HMRC will need to think of alternative strategies or abandon the changes altogether. Merely completing an EQIA does not equate to compliance with the law.

Recommend any additional research currently being carried out published when complete.

Recommend HMRC publish all research carried out leading up to EQIA, to allow external representatives to comment fully on conclusions, and make more informed comment and suggestions.

No attempt made to understand if customer composition different on Sundays to rest of week.

Concerned that post-implementation assessment based only on customers who are successful in speaking to HMRC, won't reflect those who were unable.

- The proposals for change were based upon analysis of customer demand by half hour across each line of business. However, we recognise that limited data was available to assess the equality impacts of the proposed changes. HMRC has therefore reviewed all feedback received (including survey results) and published the findings in Section 6 and Appendix E to make this easier for customers and organisations to understand, including additional data relating to equality.

- Equality data samples have been taken from a combination of peak and non-peak periods, and are therefore fully representative. The demand data upon which new opening hours were based was drawn from analysis of a 12 month period.