

HM Revenue & Customs

Final Report and Action Plan for the Proposals for
Amendments to HMRC Northern Ireland Employees' Easter
Public Holiday Leave

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1. Executive Summary

Easter Privilege Holidays in Northern Ireland for HMRC employees

- HMRC is proposing a change to one of the Northern Ireland (NI) Easter public holiday days from Easter Tuesday to Good Friday to fit with the public holiday at this time across HMRC. This will impact on the opening of enquiry centres and also on some employees, who previously haven't worked on Easter Tuesday who will switch their privilege holiday to Good Friday.

The data/information considered for this EQIA

- In carrying out this EQIA, HMRC has taken the following consultation and research findings:
 - Responses to the full EQIA consultation.
 - Input was invited from all HMRC Northern Ireland employees as part of initial consultation – 100 replies were received (of around a total of 2000 Northern Ireland HMRC employees).
 - Business area feedback from senior managers in Northern Ireland via the Northern Ireland Diversity Steering Group.
 - Responses from DTUS on the possible impacts in the initial consultation.
 - Research on the opening hours of Northern Ireland Nurseries at Easter.

The purpose of the EQIA consultation

- To ensure that HMRC had captured and taken account of all the equality (and other major) impacts of the proposals on HMRC customers and employees. To capture all possible mitigating actions to address the impacts identified and to get agreement to appropriate actions.

The consultation process

- The formal consultation period ran from 11th October 2010 until 31st December 2010, although informal consultation with HMRC employees and business areas took place from June to September 2010. We have corresponded with TUS on this issue since 2005.

Responses received (see Annex A for a list of the respondents)

- We received only 4 responses through the formal consultation of which one was from a business perspective and one was from an external organisation (who had no comments to make) but had 100 responses from HMRC employees and 16 responses on behalf of the business as part of prior informal consultation.

The main issues raised during the consultation process

- Possible impact to HMRC customers around Enquiry Centre Opening
- Impacts on HMRC employees of the proposed changes around religion and belief and carers – those with dependants in relation to nursery opening hours and travel arrangements.

The mitigating actions identified through the consultation process

- **Customers:** We will give advance notice through posters, verbal notice and online communication to customers of any of the Enquiry Centres where their hours are

- **HMRC employees:** We will give advance notice through communication of the change in public holiday to employees and ensure that these stress that managers should be flexible around hours of arrival and leaving work where there are employees who have difficulties in getting to work. Leave can be taken and where leave must be rationed due to business needs, priority for leave should be given to those who have additional childcare or other caring difficulties as a result in the change in the public holiday.

Steps taken to promote equality and good relations

- Consultation on the proposals was done to as wide a group as possible, with HMRC Intranet messages and separate notes through the HMRC Diversity Networks and with the business through the Northern Ireland Diversity Steering Group. We have also approached a large number of external diversity groups in Northern Ireland.
- Managers will be advised to flexible to mitigate against impacts for employees with careering responsibilities or particularly difficult travel arrangements as a result of any change in the public holiday.

A Note of thanks to all those who contributed to the production of this EQIA

- HMRC would like to thank all the individuals and organisations both within and external to the Department who contributed information or views on the equality and other impacts of the proposals to change Easter privilege leave for a proportion of Northern Ireland based HMRC employees.

2. Key Findings and Outcomes

Impacts to HMRC customers

Evidence reviewed

- We reviewed all the feedback we received from the HMRC business areas and TUS at both the formal and informal consultation stages. We had no individual feedback on customer impacts.
- For this EQIA there was no other data to be taken account of.

Monitoring of impacts

- We will ask the business to monitor the impacts to customers from feedback received to ensure we do as much as possible to resolve any issues and impacts to the equality groups.

Outcomes

Possible impacts to customers around Enquiry Centre Opening.

- The switch in the day for the public holidays will mean that Enquiry Centres will change the day they are open from Easter Friday to Tuesday and in some cases where a building is shared due to prohibitive costs we will not be in a position to open an Enquiry Centre on the Tuesday.
- The footfall in these offices is low and increasingly we have operated an appointments system in Enquiry Centres so we believe the impacts on customers will be minimal.

Proposed mitigating actions

- We will give advance notice through posters, verbal notice and online communication to customers of any of the Enquiry Centres where their hours are to change or where a Centre will not open on Easter Tuesday. Additionally any Appointments with customers will be made on dates avoiding the Easter Tuesday where an Enquiry Centre will not be open.

Impacts to HMRC Employees

Evidence reviewed

- We reviewed all the feedback we received from individuals and organisations such as the HMRC Diversity Networks, the HMRC business areas and TUS at both the formal and informal consultation stages.
- We also took advice from the HMRC Diversity Team and did research into travel timetables and nursery opening hours over the Easter period.
- For this EQIA there was no other data to be taken account of.

Monitoring of impacts

- We will ask that business areas monitor the impacts of the proposed change should it go ahead to ensure that the impacts are as we have envisaged them and not any greater and that a constant approach that recognises the impacts of the change is being taken to the granting of leave across business areas.

Outcomes

The main impact for employees will be on those former working for the Inland who currently have a holiday on Easter Monday and Tuesday. The proposals if carried out will mean that these employees will no longer have their public holiday on Easter Tuesday but on Good Friday.

The impacts to employees that we have identified are relatively small and we believe these can be addressed by the proposed mitigating actions. We therefore believe that the efficiency savings and improvement to the work of the business areas across the UK and Northern Ireland outweigh the relatively minor impacts identified.

Following the consultation we do not believe there will be many equality impacts, or any impacts affecting large numbers, of HMRC employees as a result of the proposed change.

No impacts have been identified in relations to

- Racial groups
- Disability
- Gender
- Transgender
- Age
- Marital status
- Sexual orientation

Impacts have been identified for the following:

Religion and belief

- The areas identified where there is an impact were religion and belief that were identified were all in favour of the proposed change, allowing observance of Good Friday as an important day in the Christian calendar. The impacts of the proposals are therefore positive.
- The feedback showed that there were a number of employees that were pleased that the proposed amendments to the privilege leave would allow them time off to observe their religious beliefs without having to take their own leave to ensure they could do this.

Carers

- Nursery provision is not as good on the Easter Tuesday as Good Friday as a number of nursery providers are closed on the Tuesday who would be open on Good Friday. This impact should not affect carers who have children at school as they will already have to make caring arrangements for the school age children as the schools are closed over the entire Easter period. We have addressed this impact below in the mitigating actions.
- We have not been made aware of any other significant care related impacts that might result from the change.

Mitigating actions

- We propose that managers be asked where possible, to view leave requests favourably from employees with caring responsibilities, where they have been adversely impacted by the change in their public holiday.

Other Impacts

- Transport on Easter Tuesday is largely run on a reduced 'Sunday service' and a small employees will find it harder to get to work. There is no suggestion from the consultation that there are any equality impacts related to transport.

Mitigating actions

- We propose that managers be considerate of start and finish times and where possible, treat leave requests favourably for employees where there would be considerable impacts on journey to work times on Easter Tuesday as a result in the change in their public holiday. This is particularly if there are any impacts identified for those in any of the equality groups.

Conclusions

- There would seem to be no equality impacts identified to customers and employees significant enough to indicate that the proposals to change one of the Easter privilege leave days for HMRC employees that work within for Inland Revenue business areas should not be recommended. Especially given that we can put mitigating actions in place that will address the impacts identified.

Next Steps for this EQIA and the proposals

- We will publish this report on the HMRC Internet and Intranet and send advance copies of the Report to the HMRC Diversity Networks and TUS.
- We will advise the HMRC policy governance body that the proposals can go ahead subject to the suggested mitigations in this Report.
- Assuming they agree the proposals can be implemented we will then:
 - Contact senior managers in the HMRC business areas most affected by the recommendations and advise that the proposals can go ahead but advise they should:
 - Draft communications to customers who might be affected and adopt mitigating actions along the lines of those suggested by this Report.
 - Communicate as early as possible the decision to accept the proposals to employees within their line of business including any proposed mitigating actions
 - Agree with the HMRC HR Policy Team a central communications message for the HMRC Intranet aimed at all Northern Ireland based HMRC employees affected to be published as soon as is possible before the Easter break.
 - Put in place arrangements to monitor the effects of the change and agree to look into any equality impacts identified and look at possible further mitigations needed.
 - Notify TUS of the decision regarding the proposals and further actions proposed.

Annex A: List of respondents

The respondents over the complete consultation process were:

- TUS during the initial consultation.
- Individual Northern Ireland based HMRC employees – around 100 replied to the initial consultation and several more to the full consultation. The majority of replies consisted of individual views on the proposals with no equality impacts mentioned.
- Business representatives within the Northern Ireland Diversity Steering Group.
- Individual HMRC business area representatives including Senior Responsible Officers for buildings within the HMRC Northern Ireland estate.

Annex B: Summary of Consultation Responses

Examples of responses that mentioned an equality impact are as follows:

'On taking a straw poll of my colleagues, from various areas of the Christian faith and of other or no faiths, the overwhelming vote is to commemorate Easter on Good Friday and have that day as the holiday.'

'HMRC also delivers face to face services to the public in 10 enquiry centres in NI which are open Good Friday. Changing the opening pattern could impact on customers. HMRC has published a full EQIA on its plans for F2F and is currently consulting with staff and external stakeholders on remodelling the service. This additional consultation/EQIA on Good Friday would further muddy the waters.'

'Good Friday is the high point in the Christian calendar and therefore it would also be more appropriate to have that day off. (I am very surprised that Christians in Northern Ireland have not raised this before as opening the offices on Good Friday could be considered as discrimination against Christians by treating them differently than the rest of the UK and in some instances necessitating them to come to work).'

'I am part of a larger business group which is closed on Friday in GB then open on Tuesday while N I offices are open Friday and closed Tuesday --- this disrupts business continuity. The nature of my work means that I deal with Traders / Employers/Companies/Individuals from any part of the UK. Indeed I currently have responsibility for Scottish VAT recovery which takes up about 40% of my clerical resource. As we move forward I would expect that the GB element of my work will increase significantly. It does not make sense to me to have an office closed when customers are trying to make contact.'

'Although the schools are closed and as such childcare will be responsibility of parents holiday playschemes and, in most cases, childminders, do not operate on Easter Tuesday. Or if they do they charge commensurately, that is Bank Holiday rates or treble time, making it impossible for any HMRC employee to be able to afford the cost. The exact same criteria apply to anyone caring for a parent or relative as Home Helps etc do take the Tuesday as a Bank Holiday.'

'Schools in NI are off on Good Friday as well as the following Tuesday, as are Nursery Schools attached to Education and Library Boards meaning the care impact for those with children at School and those nursery's' is the same either way.'

'Child care providers also take the Monday and Tuesday as the holiday. Were does this leave staff who have to attend on the Tuesday as they would need the take leave for this day to look after children.'

'Can I please state the case for adult care required as well, so that the details are not put forward just in relation for those staff who have children. All care facilities , Doctors Dentists, District Nurses, day care facilities for the elderly, etc in NI close Monday and Tuesday Thus if a dependent adult is receiving care or treatment from any of these practices if the staff with the caring responsibility were not at home on that day due to lack of a BH or Priv leave for the full day, then it would mean taking leave etc. This could be classed as being discrimination. Also does this leave us open to applications for Dependent care/special leave. If the member of staff is "forced" into working that day when previously a BH was available in NI?'

'If this change was to take place, I would find it nearly impossible to get to work on Easter Tuesday, due to a reliance on public transport to get to work. Also, my wife works and lack of specialist childcare for our disabled son would mean she would need extra time off work, at a time when staffing levels are already an issue.'

'My child attends child care which closes on the Easter Monday and Tuesday which are the normal days taken in NI for Easter Holidays. If the public holiday is removed from the Easter Tuesday, I would have to take the Easter Tues off on leave in order to provide care for my child. As I am part time I am only entitled to public/priv days in a pro-rata bases so I would not be entitled to all 2 ½ days leave for this and would have to use my own leave.'

'I have no objection to the change in the Easter Holidays, as a former C&E member we always took the same time off as the rest of our colleagues in the Department. At that time I was the primary carer of my parents, one of whom suffered from Alzheimer's and the other from Emphysema and was on oxygen. Both my parents were house bound and unable to cope for themselves so I had to rely on outside carers to enable me to go to work and these holidays caused no trouble.'

Annex C: Proposed Actions

The Actions proposed are included within 'Next Steps' on page 7 of section 2 Findings and Outcomes in the main Report.

Annex D: Questions asked in Consultation

1. Have the impacts to carers been correctly identified and are there any additional impacts that have not been identified?
2. Have the all the correct mitigating actions been proposed and are there any other ways that any identified impacts can be reduced or eliminated?
3. Can you identify any ways that the proposed changes can be used to promote equality of opportunity for carers
4. Have the potential impacts around religion been correctly identified and are there any additional impacts that have not been identified?
5. Have the all the correct mitigating actions been proposed and are there any other ways that any identified impacts can be reduced or eliminated?
6. Can you identify any ways that the proposed changes can be used to promote equality of opportunity for the areas of religion, belief and political opinion
7. Are there any other significant non-equality impacts that will have an impact on HMRC employees that we have not identified?
8. Have the all the correct mitigating actions been proposed and are there any other ways that any identified impacts can be reduced or eliminated?
9. Have the significant impacts to customers been identified and are there any additional impacts that have not been identified?
10. Have the all the correct mitigating actions been proposed and are there any other ways that any identified impacts can be reduced or eliminated?