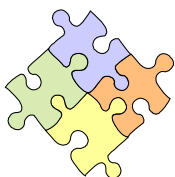


# **Equality Impact Assessment for Consultation**

“What will be the impact of HMRC’s proposals to reshape its use of office buildings in the Belfast Area?”



Issued by HMRC Workforce Change  
19 September 2007

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## **QUICK SUMMARY OF THE DOCUMENT**

### **Why we are consulting**

In November last year, HM Revenue & Customs (HMRC) announced a nationwide programme of reviews designed to help modernise its operations by restructuring its office accommodation in line with future business needs.

The programme is now focusing on the Belfast urban centre in Northern Ireland and we have published proposals for re-organising our offices in the area, including those in Antrim and Lisburn.

As part of that review, we have made our own assessment of the likely impact of those proposals on a range of groups within our workforce, our customers and the local community, in terms of equality and diversity. In accordance with Section 75 of the Northern Ireland Act 1998, we are opening up our assessment to public consultation, along with the actions we plan to take to offset potential adverse impacts arising from it.

### **What we are proposing**

HMRC currently occupies nine office buildings and seven specialist sites in the Belfast area. Together they house about 1,700 employees.

By 2010, we expect the number of staff we need in the Belfast area to reduce to around 1,600. We therefore propose to withdraw from three office buildings and retain just six. Regardless of the Belfast review's outcome, we will be retaining all Enquiry Centres (at or nearby their current locations) and all seven specialist sites.

Full addresses for the buildings included in this review appear in Appendix C.

### **Equality impacts we have identified**

We think there will be minimal impact on persons of different racial groups, sexual orientation, age (employees only), marital status, religious beliefs, political opinion and those with dependants (customers only).

However, we anticipate possible adverse impacts on employees with a disability or with dependants and female employees (linked to part-time working and caring responsibilities). Elderly customers and those with a disability could also be affected where Enquiry Centre services are relocated.

### **Mitigating actions we will take**

For employees, we will consider flexible working patterns, reasonable adjustments and offer one to one discussions with managers to help identify any difficulties with reasonable daily travel to relocation options. We will also run moderating panels to review mobility decisions, as well as operating statutory appeals and grievance procedures. For customers, in particular disabled or elderly people, we will ensure Enquiry Centre services are retained in their current location or nearby.

### **Our main recommendations**

- HMRC to monitor the quality of its employee diversity data and consider improvements required.
- Senior managers to support Team Leaders in identifying reasonable solutions for employees.
- Managers should consider and discuss options for employee working patterns to change, if required as a result of increased travelling.
- Further consideration to be given to equality impacts if a replacement Enquiry Centre facility is required.

### **How the consultation will work**

We have sought guidance and taken advice on this Equality Impact Assessment and the related consultation process from the Equality Commission for Northern Ireland. Our proposals, our impact assessment and suggested mitigating actions are all contained in this document. The final chapter carries more detail on how the consultation process will work and how to register your views.

At key points, you will find questions which we think are particularly important. However, we welcome comments on any related topic. Be aware, however, that you should use the email address provided only for comments, and not for any other business, including requests for information. At the end of the consultation period we will publish a summary of the comments we have received.

Printed copies can be obtained from any HMRC Enquiry Centre.

You can also download a copy from

<http://www.hmrc.gov.uk/better-regulation/regional-reviews.htm>

or you can contact

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(Please quote **EQIA Feedback** in the subject title box)

## **EQUALITY IMPACT ASSESSMENT FOR CONSULTATION**

“What will be the impact of HMRC’s proposals to reshape its use of office buildings in the Belfast Area?”

### **1. HMRC and its Change Programme**

- 1.1 HM Revenue and Customs (HMRC) was formed on 18 April 2005, following the integration of two former departments: Inland Revenue and HM Customs and Excise. It administers the UK’s tax and customs systems with the aim of ensuring society’s financial well being. See Appendix A for a full list of the Department’s duties.
- 1.2 The creation of the new Department means it is possible to free up a substantial amount of existing office space. In addition, HMRC’s business units plan to deliver major improvements in performance across the full range of our responsibilities over the next five years. They are looking to integrate teams and co-locate them in an office network more suited to introducing business processes that will meet the expectations of today’s customers.
- 1.3 In November 2006, HMRC announced an office review programme. The programme is being rolled out on a regional basis and has begun by looking at the urban centres in each region, followed by Northern Ireland, Scotland and Wales, which is where around 75% of our employees are already based. It will move on to reviewing offices in smaller towns later this year and individual locations during 2008.

### **2. How reviews work**

- 2.1 An initial diagnostic stage results in an outline proposal for an area, as set out for the Belfast urban centre in this consultation document. HMRC is keen to ensure that such proposals are properly thought through and, in particular, that the degree of disruption for its employees and customers is minimised. For that reason, we invite all those affected to make their contributions at an early stage in the planning process.
- 2.2 Over the following three to four months, the proposal is tested in detail through feasibility studies and by listening to the views of employees, trade unions and others. A decision is then taken on the changes we intend to make to our estate. Implementation, however, is likely to be spread over a number of years, depending on such factors as leasing agreements coming up for renewal, and will always be subject to changing business needs.
- 2.3 During the feasibility stage, and while the wider consultation is taking place, staff who may have personal concerns about moving are invited to talk about their personal situation with their manager.
- 2.4 Employees’ individual circumstances are again considered, this time formally, at the point where intentions to withdraw from, or retain, offices are known. We look at how reasonable it would be to ask each person to travel to a different building, based on comparing home addresses with what is considered reasonable daily travel. For a summary of HMRC’s “Reasonable Daily Travel” Policy see Appendix G.

- 2.5 Managers will look for mitigating action to reduce adverse impacts and HMRC has a number of policies available that will help in this process, for example, flexible working patterns, as detailed in Appendix H. It also employs specialists, for example, occupational health doctors and nurses, HR professionals and IT specialists, and consults with external organisations, for example, *Access to Work*.
- 2.6 The outcome of manager and employee discussions is confidential. The information is not attributable and any useful generic outcomes will be incorporated into the Equality Impact Assessment (EQIA) process.
- 2.7 Each set of decisions is supported by a set of Equality Screens for the area. Impact Assessments are also carried out and later published on each building we intend to withdraw from within 12-18 months of a decision. These take into account factors such as
- running costs and other financial considerations
  - contractual obligations to partners like Mapeley (buildings) and ASPIRE (IT)
  - potential social and economic impacts
  - alignment where possible with business plans for work and employees
- 2.8 Reviews are underway throughout the UK and decisions have already been reached and published on central London, outer London, and urban centres in the South East, East and South West of England. Further information on the review process can be found on our website.

### 3. The Belfast area proposal

- 3.1 HMRC has more office space than it needs in the Belfast urban centre. In addition, while today about 1,700 people work for us in the area, by 2010, HMRC's current business plans predict that we will require around 1,600. HMRC aims to achieve these reductions through natural attrition, early retirement schemes and restricted recruitment. No-one will lose their job as a direct result of this proposal.
- 3.2 It is proposed to reduce the nine existing office buildings to six: Crown Buildings in Antrim and Beaufort House, Carne House, Custom House, Dorchester House and Millennium House in Belfast. The three buildings from which HMRC proposes to withdraw are Moira House in Lisburn and Olivetree House and Windsor House in Belfast.
- 3.3 For a map of the HMRC Belfast offices included in the proposal see Appendix B; for a list of the buildings, including addresses see Appendix C; for a list of relocation options for employees see Appendix D.
- 3.4 We would also retain all specialist sites and existing Enquiry Centres within their current locality. The three existing Enquiry Centres are identified in Appendix F. **HMRC is committed to maintaining Enquiry Centre services close to their existing locations. Should HMRC withdraw from any building containing an Enquiry Centre, an Enquiry Centre service will be provided from an alternative location nearby.**
- 3.5 The current proposal is for consultation only. **No firm decisions have been made at this stage** on whether buildings will be retained or vacated. Decisions will be informed and influenced by all relevant information including that provided as a result of this EQIA and consultation.

- 3.6 Work on identifying the best options for where to locate has taken into account factors such as where business units would like their employees situated, the impact on employees of moving, how much each building costs to run and its capacity to accommodate employees, as well as contractual obligations.
- 3.7 The buildings we propose to retain offer longer term, more flexible accommodation, which would enable business units to co-locate their teams better, as well as increasing the variety of job opportunities available to our employees. Some reorganisation would be needed to make the best use of space.
- 3.8 Consultation on the Belfast proposal has now started and will last until 27 November 2007. In addition to employees and unions, we have also written to Northern Ireland MPs and MLAs with affected constituencies, the First Minister and Deputy First Minister of the Northern Ireland Assembly, all affected local authorities, the Head of the Northern Ireland Civil Service and the Permanent Secretary in the Northern Ireland Office.

#### **4. HMRC's statutory obligations to consult on the impact of its proposals on equality in Northern Ireland**

- 4.1 HMRC acknowledges its need to meet additional legal requirements in Northern Ireland and has therefore expanded the review process conducted elsewhere in the UK to include a full Equality Impact Assessment on its proposals for Belfast, and to open it to public consultation.
- 4.2 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 and
  - between persons with dependants and persons without
- 4.3 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, with and without a disability, and men and women generally
  - eliminate unlawful discrimination between different racial groups, those with and without a disability and men and women generally (including transsexuals)
  - promote good relations for people of different racial groups
  - encourage participation in public life by disabled people
  - promote positive attitudes towards disabled people and
  - eliminate harassment, which is related to disability or gender
- 4.4 HMRC considers its approach to Equality Impact Assessments meets the statutory requirements set out above.

## **5. The Belfast area Equality Impact Assessment**

- 5.1 This Equality Impact Assessment
- defines the aims of the proposals for the reduction of the HMRC estate in the Belfast area
  - considers related data and research
  - assesses the impacts of the proposals
  - considers measures which might mitigate any adverse impact or alternative policies which might better achieve the promotion of equality of opportunity
  - invites comments from the public as part of a formal consultation process
- 5.2 As part of the Equality Impact Assessment process HMRC will
- ensure that responses received during the formal consultation and any information or data that becomes available or is drawn to our attention will be used to inform and influence the decisions on the Belfast area and that a report of those responses will be published
  - monitor potentially adverse impacts in the future and publish the results of such monitoring as appropriate
  - publish the findings of the consultation process on our Equality Impact Assessment on the HMRC website
- 5.3 HMRC has undertaken a high-level Equality Screen on the proposals for Belfast, in accordance with our approved equality scheme and statutory obligations. Data was obtained from a variety of sources, both internal and external.
- 5.4 Internally, HMRC collects monitors and evaluates equality data relating to its employees in four specific areas: gender, race/ethnic origin, disability and, for Northern Ireland only, community background. HMRC employee diversity data can be found at Appendix E.
- 5.5 This data is provided by employees on a voluntary basis and we have a communications strategy, planned for Autumn 2007 onwards, to encourage employees to submit their diversity data on our electronic HR systems. This is expected to provide a more complete and accurate picture for equality impact assessment work in future.
- 5.6 However, when we considered the diversity data available to us during our initial equality screening process we concluded that it did not enable a proper assessment to be made on all of the groups specified within Section 75 of the Northern Ireland Act 1998. We therefore decided that it would be necessary to consult on an Equality Impact Assessment to establish fully how the proposal might affect employees and others.
- 5.7 Externally, HMRC collects data on customer numbers attending Enquiry Centres. This data has also been considered and can be found at Appendix F.
- 5.8 Further external data used is listed below
- HMRC reports in 2005 on customer diversity within core and secondary catchment areas for our Enquiry Centres, commissioned from Experian Ltd
  - Census 2001 data
  - Northern Ireland Statistics and Research Agency data
  - Northern Ireland Life and Times Surveys 2005 and 2006

- 5.9 We have sought guidance and taken advice on this Equality Impact Assessment and the related consultation process from the Equality Commission for Northern Ireland.
- 5.10 As further reviews on our Northern Ireland offices take place, Equality Screens on the resulting proposals will be conducted. Where necessary, Equality Impact Assessments will also be carried out and be subject to full consultation.

## 6. DETAILS OF IMPACTS WE HAVE ASSESSED, OUR RECOMMENDATIONS, AND QUESTIONS FOR CONSULTATION

### 6.1 Racial Groups

Ethnicity Data considered			
Location	White %	Ethnic Minority %	Not known %
Employees in Antrim, Belfast and Lisburn offices <sup>1</sup>	63.0	1.0	36.0
Northern Ireland population <sup>2</sup>	99.2	0.8	-
Antrim core catchment population <sup>3</sup>	99.0	1.0	-
Belfast core catchment population <sup>3</sup>	98.6	1.4	-
Lisburn core catchment population <sup>3</sup>	99.1	0.9	-

- 6.1.1 The figures above indicate that HMRC employees should be encouraged to volunteer information on race via HMRC's internal HR systems. However, of those who have provided this information, 99% are white and 1% are from an ethnic minority group, a finding which is in line with the general population of Northern Ireland.
- 6.1.2 Feedback from HMRC's Equality Impact Assessment on Relocation and Restructure indicated that increasing numbers of Eastern European migrants moving to Northern Ireland are using the Enquiry Centre services.
- 6.1.3 Employees of different racial groups may experience a change in support networks and facilities available if relocated to an alternative building. However, no jobs will be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily

<sup>1</sup> HMRC HR data as at 1/10/06

<sup>2</sup> Census 2001 data, KS02

<sup>3</sup> Experian Data

travel of their home. The impact on employees from different racial groups is expected to be minimal.

- 6.1.4 The current Enquiry Centre services provided in Belfast will remain and the Enquiry Centre services provided in Lisburn will continue to be provided from Moira House, or from an alternative location nearby. Any impact on customers of different racial groups is expected to be minimal.

**RECOMMENDATION**

- 6.1.5 HMRC should monitor the completion rate of the employee diversity data and consider alternative strategies, if required.

This recommendation also applies to “employees with or without a disability” where the data is also incomplete.

**QUESTION**

- 6.1.6 Have the impacts to persons of different racial groups been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

**6.2 Those with or without a disability**

Disability Data considered			
Location	Disabled %	Not disabled %	Not known %
Employees in Antrim, Belfast and Lisburn offices <sup>1</sup>	6.0	55.0	39.0
Northern Ireland population <sup>4</sup>	37.5	62.5	-
Antrim core catchment population <sup>5</sup>	9.9	90.1	-
Belfast core catchment population <sup>5</sup>	13.1	86.9	-
Lisburn core catchment population <sup>5</sup>	9.5	90.5	-

<sup>4</sup> Census 2001 data: Households with limiting long-term illness, KS08

<sup>5</sup> Experian data: Not good health

- 6.2.1 The figures above indicate that HMRC employees should be encouraged to volunteer information on disability via HMRC's electronic HR systems. However, of those staff who have provided this information in the Belfast area, 10% are disabled and 90% are non-disabled.
- 6.2.2 No jobs will be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily travel of their home. However, we recognise that there may be some adverse impacts to employees with a disability as a result of relocating within the Belfast area, and this may be greater for those currently working in Lisburn, who will have further to travel into Belfast. Statistics for Lisburn show
- 6% of employees have a disability
  - 58% of employees have declared they have no disability
  - 35% of employees have not volunteered this information
- 6.2.3 Impacts on those with a disability will be dependent on personal circumstances.
- Employees relocating to a new building may experience changes to their home to work journeys. There may be an adverse impact on employees with a disability who travel to work by public transport if the public transport services available at the new location are inadequate.
  - Employees with a disability travelling to work by car may be adversely impacted if their current location provides disabled parking facilities and these are not available at the new location.
  - Employees requiring specialist IT equipment or reasonable adjustment adaptations may need to discuss their requirements with their manager to ensure these continue to be provided at the new location.
  - Employees requiring specialist IT software may be unable to relocate into other business units within HMRC due to limitations in the compatibility of HMRC software with specialist IT software.
  - Employees who transfer into another business unit and require training may be unable to travel to training courses or stay overnight at residential courses.
- 6.2.4 Managers should understand the need to handle these issues sensitively and work closely with employees and HR specialists to identify reasonable solutions to any issues that arise. Employees will not be expected to travel outside of reasonable daily travel and HMRC believes it has adequate HR policies and specialist support in place to mitigate any adverse impacts arising to individuals.
- 6.2.5 Under the proposals, the current Enquiry Centre services provided in Belfast would remain where they are and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House, or from an alternative location nearby. If any new location is not sufficiently near public transport services or does not have car parking facilities customers with mobility impairment may be adversely impacted. The impact on the needs of customers with a disability will inform and influence the decision regarding the relocation of any Enquiry Centre services. Any such relocation of Enquiry Centre services will be carried out so as to meet the requirements of the Disability Discrimination Act 1995 (as amended).

**RECOMMENDATION**

6.2.6 HMRC should monitor the completion rate of the employee diversity data and consider alternative strategies to encourage completion, if required.

This recommendation also applies to “Racial Groups”, where the data is also incomplete.

**RECOMMENDATION**

6.2.7 Senior managers should ensure Team Leaders are able to handle issues arising in a sensitive manner and that they receive sufficient support to identify reasonable solutions to resolve issues and mitigate adverse impacts.

**RECOMMENDATION**

6.2.8 If a replacement facility is required for the Moira House Enquiry Centre, further consideration should be given to the impacts arising on those customers with a disability. The impact on the needs of customers with a disability will inform and influence the decision regarding the location of the replacement Enquiry Centre.

This recommendation also applies to elderly customers, who may not be fully mobile.

**QUESTION**

6.2.9 Have the impacts to persons with or without a disability been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

### 6.3 Gender

Gender Data considered		
Location	Male %	Female %
Employees in Antrim, Belfast and Lisburn offices <sup>1</sup>	46.0	54.0
Northern Ireland population <sup>6</sup>	48.7	51.3
Antrim core catchment population <sup>3</sup>	48.8	51.2
Belfast core catchment population <sup>3</sup>	47.2	52.8
Lisburn core catchment population <sup>3</sup>	48.7	51.3

- 6.3.1 HMRC employs a higher proportion of female employees than male, reflective of the local population. Of the employees in Antrim, Belfast and Lisburn we employ 18% on a part-time contract and 89% of these employees are female.
- 6.3.2 In Lisburn our internal statistics show that 32% of the employees are part-time and 96% of these part-time employees are female. It is expected that some of these employees will have care responsibilities and the potential impacts on those with dependants is reported later in this document.
- 6.3.3 No jobs will be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily travel of their home. However, we acknowledge that there may be some adverse impacts on employees relocating within the Belfast area, and this may be greater for those currently working on a part-time contract, who may have to travel further to work as a result of relocation. HMRC will not expect employees to travel outside reasonable daily travel and, for those experiencing increased travel times, it is important that HMRC provides reasonable options for changing working patterns.
- 6.3.4 Transgender employees may experience changes in support networks/facilities as a result of relocation, but employees will not be expected to travel outside reasonable daily travel, when relocated to an alternative building.
- 6.3.5 The impact on employees of different gender is expected to be minimal.
- 6.3.6 Under the proposal the current Enquiry Centre services provided in Belfast would remain and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House or from an alternative location nearby. The impact on customers of different gender is, therefore, expected to be minimal.

<sup>6</sup> Census 2001 data: KS01

**RECOMMENDATION**

6.3.7 HMRC managers should consider reasonable options for employees to change working patterns, should this be required as a result of increased travelling to an alternative building.

This recommendation also helps to mitigate any adverse impacts to “employees with dependants”, who may need to re-arrange their domestic commitments as a result of changed travelling times to a new office.

**QUESTION**

6.3.8 Have the impacts to persons of different gender been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

**6.4 Age**

<b>Age Data considered</b>			
<b>Location</b>	<b>0 – 19 %</b>	<b>20 - 59 %</b>	<b>60+ %</b>
Employees in Antrim, Belfast and Lisburn offices <sup>1</sup>	0.5	98	1.5
Northern Ireland population <sup>7</sup>	9.7	52.7	17.6
Antrim core catchment population <sup>3</sup>	22.3	54.5	23.2
Belfast core catchment population <sup>3</sup>	29.0	53.0	18.0
Lisburn core catchment population <sup>3</sup>	26.6	55.0	18.4

6.4.1 Should approved early retirement schemes be available to employees in the Belfast area, these will be voluntary. Take up of these schemes may impact on the age demographics in the area.

6.4.2 No jobs will be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily travel

<sup>7</sup> Census 2001 data: KS02

of their home. The impact on employees of different ages is expected to be minimal.

- 6.4.3 Under the proposal, the current Enquiry Centre services provided in Belfast would remain where they are and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House, or from an alternative location nearby. Elderly customers may be adversely impacted if the new location is not near public transport services or does not have car parking facilities. The impact on the needs of elderly customers will inform and influence the decision regarding any relocation of Enquiry Centre services.

### RECOMMENDATION

- 6.4.4 If a replacement facility is required for the Moira House Enquiry Centre, further consideration will need to be given to the impacts arising on elderly customers. The impact on the needs of elderly customers will inform and influence the decision regarding the location.

This recommendation also applies to “Those with or without a disability”.

### QUESTION

- 6.4.5 Have the impacts to persons of different age been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

## 6.5 Marital Status

Marital Status Data considered				
Location	Single %	Married <sup>8</sup> %	Ex-married <sup>9</sup> %	Unknown %
Employees in Antrim, Belfast and Lisburn offices <sup>1</sup>	40.6	51.2 <sup>10</sup>	6.2	2
Northern Ireland population <sup>11</sup>	33.1	55.0	11.9	-
Antrim core catchment population <sup>3</sup>	31.1	56.4	12.5	-

<sup>8</sup> Married includes those have re-married and those who may be separated, but still legally married

<sup>9</sup> Ex-married includes divorced, widowed

<sup>10</sup> Figure includes Civil Partnerships

<sup>11</sup> Census 2001 data: KS04

Belfast core catchment population <sup>3</sup>	40.4	47.2	12.4	-
Lisburn core catchment population <sup>3</sup>	29.1	58.5	12.4	-

- 6.5.1 No jobs would be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily travel of their home. The impact on employees of different marital status is expected to be minimal.
- 6.5.2 Under the proposal, the current Enquiry Centre services provided in Belfast would remain and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House or from an alternative location nearby. The impact on customers of different marital status is expected to be minimal.

<b>QUESTION</b>
6.5.3 Have the impacts to persons of different marital status been correctly identified?  What additional impacts arise as a result of the proposal and how can related risks be reduced?

## 6.6 Those with or without Dependants

Dependants Data considered		
Location	With dependants %	Without dependants %
All HMRC employees <sup>12</sup>	41.0	59.0
Northern Ireland population <sup>13</sup>	36.5	63.5
Antrim core catchment population <sup>3</sup>	36.0	64.0
Belfast core catchment population	33.5	66.5
Lisburn core catchment population	34.5	65.5

<sup>12</sup> Figures from National Staff Survey 2006

<sup>13</sup> Figures comprise homes with dependent children, but no details held on elder care

- 6.6.1 HMRC collects data on employees with dependants via the HMRC Staff Survey. The latest National Staff Survey, completed by 18,124 employees, was undertaken in November 2006.
- 6.6.2 No jobs will be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily travel of their home. However, we recognise that there may be some adverse impacts to employees with dependants as a result of relocating within the Belfast area, and this may be greater for those currently working in Lisburn who will have further to travel into Belfast. Of the employees in Lisburn, 32% work on part-time contracts, which may be an indication of the numbers of employees who have care responsibilities and who may be adversely impacted through relocation to a Belfast building.
- 6.6.2 Impacts on those with dependants will be individual and dependent on personal circumstances. Potential impacts may include
- increased travelling times. This may require employees to incur additional care costs or require changes to working patterns to balance work/life commitments.
  - a change in work activity. Employees with dependants may be required to change working patterns or hours to suit business needs.
  - additional travel costs. Daily Travel Assistance, paid to assist employees with additional travel costs, is taxable and impacts on tax credit entitlement
- 6.6.4 When relocating employees to another building, HMRC will assist employees by reimbursing additional travelling costs for a period of up to three years under the Daily Travel Assistance rules.
- 6.6.5 Under the proposal, the current Enquiry Centre services provided in Belfast would remain and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House or from an alternative location nearby. The impact on the accessibility for those customers with dependants, particularly those with young children, will inform and influence the decision regarding any relocation of Enquiry Centre services. The impact on customers with dependants is expected to be minimal.

#### **RECOMMENDATION**

- 6.6.6 HMRC managers should consider reasonable options for staff with dependants to change working patterns, should this be required as a result of increased travelling to an alternative office.

This recommendation also mitigates any adverse impacts to employees employed on part-time contracts.

#### **QUESTION**

- 6.6.7 Have the impacts to persons with or without dependants been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

## 6.7 Sexual Orientation

6.7.1 HMRC does not collect data on sexual orientation.

6.7.2 The Northern Ireland Life and Times Surveys 2005 and 2006 (see table below) questioned 1,200 and 1,230 people respectively on their sexual orientation. The responses were from a small section of the population and the lesbian, gay and bi-sexual populations are likely to be higher than the figures suggest.

<b>Sexual Orientation Data considered</b>		
<b>Responses</b>	<b>2005 Survey %</b>	<b>2006 Survey %</b>
I am "gay" or "lesbian (homosexual)	1	0
I am heterosexual or "straight"	97	98
I am bi-sexual	1	0
I do not wish to answer this question	1	2

6.7.3 HMRC recognises that employees of different sexual orientation may experience a change in support networks and facilities available if relocated to a different building. No jobs will be lost directly as a result of this proposal and it is expected that employees will relocate within the Belfast area and within reasonable daily travel of their home. The impact on employees of different sexual orientation is expected to be minimal.

6.7.4 Under the proposal, the current Enquiry Centre services provided in Belfast would remain where they are and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House or from an alternative location nearby. The impact on customers of different sexual orientation is expected to be minimal.

### **QUESTION**

6.7.5 Have the impacts to persons of different sexual orientation been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

## 6.8 Religious Belief

6.8.1 HMRC does not collect data on religious beliefs. However, we do collect data on community background for Northern Ireland employees. Current details are as follows.

Community Background Data considered				
Location	Catholic %	Protestant %	Other Faiths and Philosophies %	Not declared %
Employees in Antrim, Belfast and Lisburn offices <sup>14</sup>	49.0	46.0	-	6.0
Northern Ireland population <sup>15</sup>	43.8	53.1	0.4	2.7

6.8.2 Details on religious beliefs in Northern Ireland taken from the Census 2001 are as follows.

Religious Belief Data considered							
Location	Catholic %	Presbyterian Church in Ireland %	Church of Ireland %	Methodist Church in Ireland %	Other Christian %	Other Faiths and Philosophies %	No Religion or not stated %
Northern Ireland population <sup>16</sup>	40.3	20.7	15.3	3.5	6.1	0.3	13.8
Antrim core catchment population <sup>3</sup>	31.5	27.5	13.7	1.9	5.0	0.6	19.8
Belfast core catchment population <sup>3</sup>	47.2	15.3	12.1	4.4	4.7	0.6	15.7
Lisburn core catchment population <sup>3</sup>	14.4	23.8	26.8	5.3	9.9	0.4	19.4

<sup>14</sup> HMRC HR data as at 01/01/07

<sup>15</sup> Census 2001 data KS07b

<sup>16</sup> Census 2001 data KS07a

- 6.8.3 HMRC recognises that employees of different religious beliefs may experience a change in support networks and facilities available if relocated to an alternative building. However HMRC policy is to provide a room for “all faith” use on request.
- 6.8.4 HMRC data confirms the majority of employees currently working in our Lisburn office have a Protestant community background.
- 6.8.5 HMRC data confirms that the Belfast offices have reasonably even numbers of employees from Protestant and Catholic community backgrounds.
- 6.8.6 No jobs would be lost directly as a result of this proposal and it is expected that employees would relocate within the Belfast area and within reasonable daily travel of their home. Consideration will be given to accessibility of locations as well as to travel time.
- 6.8.7 Under the proposal, the current Enquiry Centre services provided in Belfast would remain where they are and the Enquiry Centre services provided in Lisburn would continue to be provided from Moira House or from an alternative location nearby. Consideration will be given to accessibility of locations of Enquiry Centre services. The impact on customers of different religious belief is expected to be minimal.

**QUESTION**

- 6.8.8 Have the impacts to persons of different religious beliefs been correctly identified?

What additional impacts arise as a result of the proposal and how can related risks be reduced?

**6.9 Political Opinion**

- 6.9.1 HMRC does not collect data on political opinion. No impacts in addition to those referred to in section 6.8 Religious Beliefs have been identified.

**QUESTION**

- 6.9.2 Are there any additional impacts arising to persons of different political opinions?

What are they and how can related risks be reduced?

## 7. The Equality Consultation Process

- 7.1 The proposal for Belfast reflects a great deal of research and HMRC is confident that it provides a good basis for detailed planning. We acknowledge however that we may not have captured all of the equality impacts. Local and specialist knowledge and experience of the potential equality impacts will be especially important in informing HMRC's final plans and helping to ensure they can be implemented effectively.
- 7.2 As part of the detailed feasibility stage of planning, HMRC therefore considers it essential that everyone affected is consulted on equality aspects of the proposed restructuring of HMRC within the Belfast area, in order to
- be aware of their views and opinions
  - identify potential risks and issues
  - identify potential opportunities that have not yet been recognised
  - gather ideas and suggestions for how best to implement the changes
- 7.3 By engaging people at an early stage in the planning process HMRC also aims to help people develop an understanding of the issues surrounding reorganisation, which should help make implementation easier for everyone involved.
- 7.4 In conducting this consultation exercise, HMRC is building on the experience of consulting with a range of stakeholders on proposals for earlier reviews on other urban centres and would welcome further feedback about the consultation process itself and how it could be improved.

### Timeframe

- 7.5 The consultation will take place over 10 weeks from 19 September to 27 November with detailed feasibility work completed after a further four to six weeks. The responses received during this consultation and any information or data that becomes available or is drawn to HMRC's attention will be used to inform the decisions on the Belfast area.
- 7.6 Following consultation and feasibility work, recommendations will be made to HMRC's Executive Committee. Initial decisions can be expected early in 2008 and implementation of office moves is expected to begin later in 2008 and continue through to 2010.

### How we will give you feedback on your responses

- 7.7 An HMRC project team will log and read all responses. An analysis of the responses received and any information or data that becomes available or is drawn to HMRC's attention will be used during the feasibility stage to inform the decisions. **Please note that it will not be possible to answer questions as part of the process or to deal with issues relating to particular individuals.**
- 7.8 A report and summary of responses received will be published and made available on the HMRC website.

### HOW TO TAKE PART IN THE CONSULTATION PROCESS

7.9 A dedicated e-mail Inbox has been set up to receive feedback on this Equality Impact Assessment: [consultation.EQIA-NI@hmrc.gsi.gov.uk](mailto:consultation.EQIA-NI@hmrc.gsi.gov.uk)

Feedback can also be posted to

Christine Diver
HMRC
Custom House
Custom House Square
Belfast
BT1 3ET

### QUESTION

7.10 Please let us know of any other concerns you have related to the proposal in this document including how you think the consultation and communication process could be improved.

## **Appendix A: Additional information on HM Revenue and Customs**

HMRC is one of the largest and most complex organisations in the UK handling around £325 billion per annum in revenue and dealing with over 40 million individual and corporate customers.

We collect and administer the following taxes.

**Direct taxes** – paid by the public and businesses on money earned or capital gained.

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

**Indirect taxes** – paid by the public and businesses on money spent on goods or services.

- Excise Duties
- Insurance Premium Tax
- Petroleum Revenue Tax
- Stamp Duty Land Tax
- VAT

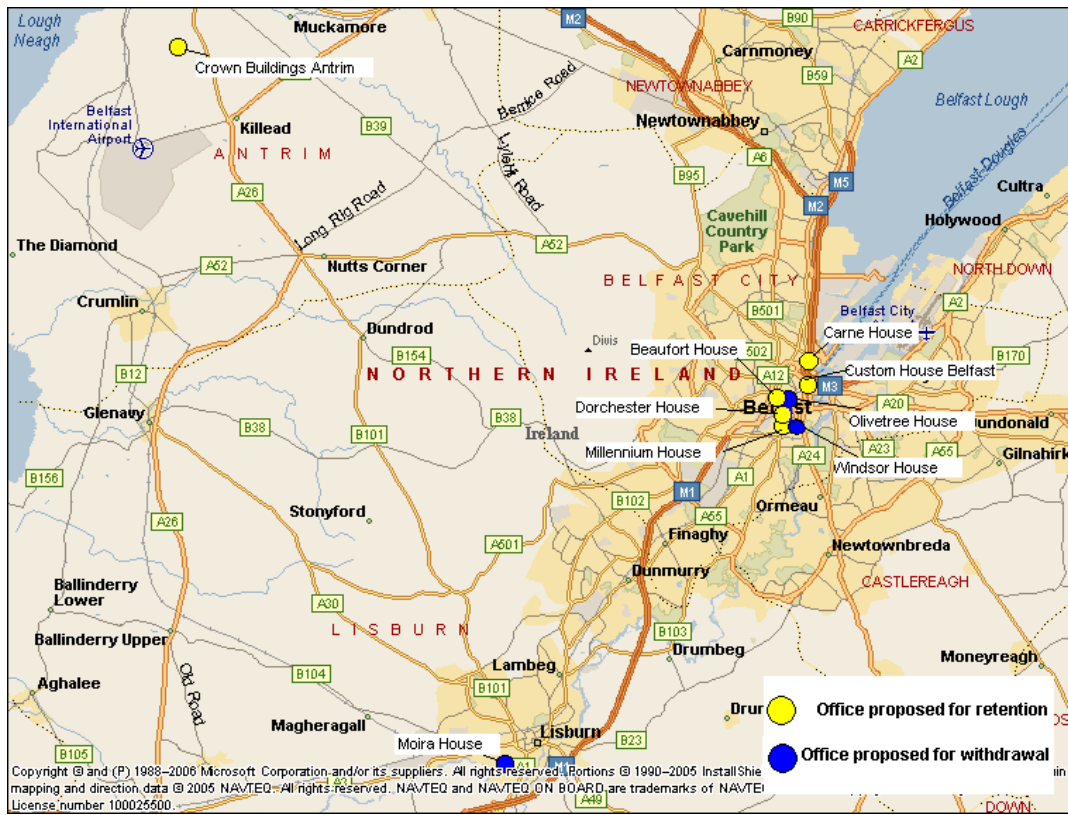
We pay and administer:

- Child Benefit
- Child Trust Fund
- Tax Credits

We protect society by enforcing and administering:

- Border and Frontier Protection
- Environmental Taxes
- National Minimum Wage Enforcement
- Recovery of Student Loans

## Appendix B: Map of Belfast Offices



## Appendix C: List of Belfast Buildings and HMRC Staff Numbers

Location	HMRC Office	HMRC staff in post July 2007	Enquiry Centre services provided?
<b>Possible sites to be retained</b>			
Antrim	Crown Buildings 12-14 Castle St, Antrim BT41 4JE	7	Yes
Belfast	Beaufort House Wellington Place, Belfast BT1 6BH	253	Yes
Belfast	Carne House 20 Corry Place, Belfast BT3 9HY	167	No
Belfast	Custom House Custom House Square, Belfast BT1 3ET	302	No
Belfast	Dorchester House 52-58 Great Victoria St, Belfast BT2 7QE	481	No
Belfast	Millennium House 17-25 Great Victoria St, Belfast BT2 7BN	92	No
<b>Potential sites for vacation</b>			
Belfast	Olivetree House 23 Fountain St, Belfast BT1 5ES	204	No
Belfast	Windsor House 9-15 Bedford St, Belfast BT1 5ES	145	No
Lisburn	Moira House 121 Hillsborough Rd, Lisburn BT28 1LB	73	Yes

### Notes to tables

HMRC business units have provided their staffing forecasts to 2008 and 2010 by location and will be asked during the feasibility phase to confirm their strategic business and location needs in the Belfast urban centre.

## Appendix D: Proposed Relocation Options for Employees

The proposed rationalisation of nine office buildings to six is expected to impact on the travelling times of some employees. Where relocation is within the same location the impact is not expected to be significant. Where there is expected to be an impact the business units will consider whether the new travelling distance and time is reasonable.

The following table shows indicative travelling times (by car) from the buildings proposed for vacation to each of the buildings proposed for retention<sup>17</sup>. These times will not be used to decide whether a journey to a new building is within reasonable daily travel for individuals.

### Travelling distances and times

Town	Office	Distance / Time to Antrim, Crown Buildings (km / miles)		Distance / Time to Belfast, Beaufort & Dorchester House <sup>18</sup> (km / miles)		Distance / Time to Belfast, Carne House (km / miles)		Distance / Time to Belfast, Custom House (km / miles)		Distance / Time to Belfast, Millennium House (km / miles)	
Belfast	Olivetree House	34.7 / 21.5	55 mins	0.4 / 0.2	3 mins	5.0 / 3.1	12 mins	3.8 / 2.4	9 mins	2.6 / 1.6	9 mins
Belfast	Windsor House	33.6 / 20.9	54 mins	1.9 / 1.2	6 mins	3.9 / 2.4	11 mins	2.7 / 1.7	7 mins	1.5 / 0.9	7 mins
Lisburn	Moira House	28.6 / 17.8	48 mins	18.7 / 11.6	25 mins	16.8 / 10.4	24 mins	15.6 / 9.7	20 mins	18.3 / 11.4	26 mins

<sup>17</sup> Source: MapInfo Drivetime Version 6.2 (software). Driving distances and times are indicative only, taking into account the type of road and average speed, but do not consider traffic peaks related to time of day.

<sup>18</sup> Beaufort House and Dorchester House are less than 0.6 km away from each other. For illustration the distance given is to Beaufort House

## Appendix E: HMRC Employee Diversity Data

The data regarding ethnicity and disability has been provided from background HR systems and completion by employees is not mandatory. The information may therefore be incomplete. Diversity data<sup>19</sup> in the table below is as at 1 October 2006.

Location	Office Name	Gender		Ethnicity			Disability status			Contract	
		Female %	Male %	White %	Ethnic Minority %	Not Known %	Disabled %	Non-disabled %	Not Known %	Full-Time %	Part Time %
Antrim	Crown Buildings	86	14	57	0	43	29	14	57	71	29
Belfast	Beaufort House	62	38	52	1	47	7	40	53	70	30
Belfast	Carne House	27	73	70	0	30	6	72	22	95	5
Belfast	Custom House	53	47	62	1	37	10	59	31	85	15
Belfast	Dorchester House	57	43	67	1	32	4	55	41	83	17
Belfast	Millennium House	52	48	67	1	32	5	61	34	90	10
Belfast	Olivetree House	49	51	62	0	38	7	53	40	82	18
Belfast	Windsor House	64	36	58	0	42	4	50	46	82	18
Lisburn	Moria House	71	29	70	1	29	6	58	36	68	32

<sup>19</sup> Figures omitted in accordance with Code of Practice on ethnicity and disability monitoring.

## **Appendix F: HMRC Enquiry Centres in the Belfast Urban Centre**

The table below summarises 2005/06 Enquiry Centre figures for each location in the Belfast urban centre providing face to face services.

<b>Location</b>	<b>Office Name</b>	<b>Total Callers</b>
Antrim	Crown Buildings	684
Belfast	Beaufort House	55,941
Lisburn	Moira House	5,642

Under the proposal, the current Enquiry Centre services currently provided at the Antrim and Belfast offices would remain where they are. The Enquiry Centre services provided at the Lisburn office would either remain at Moira House or be relocated to alternative premises nearby.

## **Appendix G: HMRC Reasonable Daily Travel Policy**

### **Reasonable daily travel**

Reasonable daily travelling time is normally about 1 hour each way. However,

- for London the travelling time can be longer
- in cases where personal circumstances affect the ability to travel, the reasonable period could be less than one hour
- where the travel is already more than an hour it could still be increased if this was proportionate and reasonable in the circumstances. This would particularly apply in London and in cases where the individual has chosen to live a long distance from the office

How the time is measured will depend on what is reasonable having regard to individual circumstances and the Department's business needs. In some cases, this may be by public transport but, if the individual normally travels to work by car, it may be reasonable to work out their new travelling time on that basis. All cases will be dealt with on their merits and personal circumstances taken into account in the way described above.

## **Appendix H: HMRC Alternative Working Patterns**

HMRC offers various options to staff considering changing their working patterns. These are

- part-time working (including job sharing and job splitting)
- part-year working (including term time)
- distance working and home working

HMRC also offers flexible working hours schemes in various business areas subject to business needs. Flexible working hours may allow staff to re-arrange working hours into a more suitable pattern. There is a national framework for flexible working hours schemes but there may be local variations.

### **Part-time working (including job sharing and job splitting)**

There is no set pattern, or number of hours to a part-time working pattern. Staff and managers agree an arrangement that suits both the needs of the individual and the business. Part-time working can be permanent or temporary. Options available include

- working fewer hours in the day
- working fewer days
- working a mixture of the above
- job sharing or job splitting.

### **Job Sharing**

Job sharing is where, usually, two people are responsible for the whole job. Job sharing requires good communication between the staff involved. It may involve sharing a desk and terminal or PC. A job can be time shared or task shared.

### **Job Splitting**

Job splitting means that the hours of people who work part-time are matched so that between them they provide the full cover the office needs.

### **Part year working**

Part year working allows staff to work full or part-time hours for part of the year and have a non-working period (not special leave) for the remainder of the year.

### **Distance working**

Distance working means working flexibly in terms of location to achieve benefits for the Department and for distance workers making it easier for people to do jobs which involve them travelling to different locations. Distance working includes

- home working
- mobile working
- working at more than one location
- hot desking
- guest working and hosting guest workers

## Appendix I: List of questions

The following questions are asked in this consultation document.

- 6.1.6 Have the impacts to persons of different racial groups been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.2.9 Have the impacts to persons with or without a disability been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced.
- 6.3.8 Have the impacts to persons of different gender been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.4.5 Have the impacts to persons of different age been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.5.3 Have the impacts to persons of different marital status been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.6.7 Have the impacts to persons with or without dependants been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.7.5 Have the impacts to persons of different sexual orientation been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.8.8 Have the impacts to persons of different religious beliefs been correctly identified?  
What additional impacts arise as a result of the proposal and how can related risks be reduced?
- 6.9.2 Are there any additional impacts arising to persons of different political opinions?  
What are they and how can related risks be reduced?
- 7.10 Please let us know of any other concerns you have related to the proposal in this document including how you think the consultation and communication process could be improved.

Responses to the above questions should be sent by email to [consultation.EQIA-NI@hmrc.gsi.gov.uk](mailto:consultation.EQIA-NI@hmrc.gsi.gov.uk) to arrive no later than 27 November 2007, please quote **EQIA Feedback** in subject title box. Alternatively, please post your response to:  
Christine Diver, HMRC Custom House, Custom House Square, Belfast BT1 3ET

## **Appendix J: List of Recommendations**

The following recommendations are made in this consultation document.

- 6.1.5 HMRC should monitor the completion rate of the employee diversity data and consider alternative strategies, if required. This recommendation also applies to “employees with or without a disability”, where the data is also incomplete.
  
- 6.2.6 HMRC should monitor the completion rate of the employee diversity data and consider alternative strategies, if required. This recommendation also applies to “Racial Groups”, where the data is also incomplete.
  
- 6.2.7 Senior managers should ensure Team Leaders are able to deal with issues arising in a sensitive manner and receive sufficient support to identify reasonable solutions to resolve issues and mitigate adverse impacts.
  
- 6.2.8 If a replacement facility is required for the Moira House Enquiry Centre, further consideration should be given to the impacts arising on those customers with a disability. The impact on the needs of customers with a disability will inform and influence the decision regarding the location of the replacement Enquiry Centre. This recommendation also applies to elderly customers, who may not be fully mobile.
  
- 6.3.7 HMRC managers should consider reasonable options for employees to change working patterns, should this be required as a result of increased travelling to an alternative building. This recommendation also mitigates any adverse impacts to “employees with dependants”, who may need to re-arrange their domestic commitments as a result of increased travelling to a new building.
  
- 6.4.4 If a replacement facility is required for the Moira House Enquiry Centre, further consideration will need to be given to the impacts arising on elderly customers. The impact on the needs of elderly customers will inform and influence the decision regarding the location. This recommendation also applies to “Those with or without a disability”.
  
- 6.6.6 HMRC managers should consider reasonable options for staff with dependants to change working patterns, should this be required as a result of increased travelling to an alternative office. This recommendation also mitigates any adverse impacts to employees employed on part-time contracts.

## **Appendix K: Code of Practice on Consultation**

This consultation is to be conducted for a period of 10 weeks rather than the 12 weeks required by the code following advice from and agreement with the Equality Commission for Northern Ireland. Other than this the consultation has been conducted in accordance with the consultation criteria in the Cabinet Office Code of Practice. If you wish to access the full version of the Code including the consultation criteria, you can obtain it at

<http://www.cabinetoffice.gov.uk/regulation/consultation/code/index.asp>

If you feel that the consultation does not satisfy these criteria, or if you have any concerns about the process, please contact –

Duncan Calloway  
Better Regulation Unit  
020 7147 2389 or [duncan.calloway1@hmrc.gsi.gov.uk](mailto:duncan.calloway1@hmrc.gsi.gov.uk)

### **The Information and Consultation of Employees Regulations 2004**

From 6 April 2005, employees in larger organisations have had the right to request their employer to inform them of, and consult with them about, business matters which affect their employment. The regulations apply to organisations that are classified as *undertakings* i.e. carrying out an economic activity, whether or not operating for gain.

Although very few government bodies are ‘undertakings’ in the strict sense, all government departments, including HMRC, are encouraged to have regard to the general principles of the Regulation. In taking this forward, we will put in place mechanisms to foster two-way communications and facilitate feedback from employees. Our communication arrangements will include such elements as use of the Departmental intranet site with provision for feedback, direct access to the Chairman and Directors via e-mail, phone-ins with senior employees, information circulars, and team briefing by line managers. Whilst not an exhaustive list it illustrates the steps we are taking as a consequence of the Information and Consultation Directive.

### **Confidentiality Disclosure**

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.