

Equality Impact Assessment

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

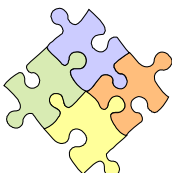
A Summary Report of Responses to the Public Consultation

On 19 September 2007 HMRC published a consultation document asking members of the public to comment on the equality issues that may arise from plans to restructure its estate in the Belfast area. The proposal is to reduce the Belfast urban centre, which includes Antrim and Lisburn from nine buildings to six, retaining appropriate specialist sites and all Enquiry Centres in their current locality.

HMRC would like to take this opportunity to thank everyone who took the time to send in their views and to assure them that all contributions will be carefully considered by the Belfast urban centre review team.

The HMRC Workforce Change team will consider all points raised in this consultation, including comments from MPs, MLAs, local authorities and external organisations. These will be considered alongside findings from the overarching feasibility study, which is evaluating other critical factors such as the likely impact of IT and estates planning.

Please note that this is a summary report of responses received, from external parties, HMRC staff and unions, to the consultation and is not designed to debate or address the issues raised. Any mitigating action which may be required as a result of this consultation will be considered by HMRC and a detailed response will be published at a later stage



Issued by Workforce Change
24 January 2008

CONTENTS

Headlines	3
1 Introduction and background	4
1.1 The consultation document and process	4
1.2 Encouraging participation	5
1.3 Number and timing of responses	5
1.4 About the respondents	7
2 Summary and samples of responses received	7
2.1 Racial Group	7
2.2 Disability	8
2.3 Gender	9
2.4 Age	10
2.5 Marital Status	11
2.6 Persons with Dependents	11
2.7 Sexual Orientation	12
2.8 Religious Belief	13
2.9 Political Opinion (Northern Ireland only)	13
2.10 Other Comments	14
3 What happens next?	15

To receive this document in an alternative version please contact the Visually Impaired Media Unit on 01274 539 646 or email janet.daykin@hmrc.gsi.gov.uk.

Headlines

- 51 responses were received, representing the views of 449 people including customers, MPs, MLAs, equality organisations, HMRC staff and unions.
- A significant proportion of responses (37%) did not comment on specific equality impacts arising from the proposals, but focused on the proposed closure of Moira House, Lisburn and the adverse impacts this may have on the level of customer service, and on potential public and private sector business investment within the city, thereby affecting the local economy.
- Of the nine groups of people identified by Equality legislation, the highest number of responses were received from the 'people with dependants', 'disabled' and 'gender' groups. These three groups each generated 13% of the total responses received. The majority of their comments focused on the potential adverse impact of increased travel.
- Many respondents believe that Northern Ireland should have been reviewed as a whole as this would have shown a better commitment to the equality agenda and Section 75 (Northern Ireland Act 1998).
- A number of people were concerned that the Belfast proposals contravene the Northern Ireland Assembly's decentralisation policy and other political and economic initiatives.
- Comments were also received from our two recognised trade unions, PCS and ARC, which broadly covered the same concerns raised by other respondents.

1 Introduction and background

In November 2006 HM Revenue & Customs (HMRC) announced a series of reviews on the future shape and direction of the department across the UK. The reviews are designed to take forward the consolidation of our estate and the co-location of our HMRC staff nationwide following the creation of HMRC from the former Inland Revenue and Customs and Excise. The overall aim is to deliver a more efficient and effective service to businesses and individuals.

On 19 September 2007 HMRC announced its proposal to reshape its estate in the Belfast area, which includes Antrim and Lisburn. This proposal was to “reduce HMRC’s accommodation in the Belfast urban centre from nine office buildings to six, retaining appropriate specialist sites and all Enquiry Centres in their current locality.”

An announcement was made to HMRC staff and a staff consultation document was published on the HMRC intranet inviting comments from staff and unions. This document was also sent to four Belfast MPs who have HMRC offices in their constituencies. The First Minister and Deputy First Minister of the Northern Ireland Assembly, the Permanent Secretary of the Northern Ireland Office, the Head of the Northern Ireland Civil Service and 25 MLAs all with constituency interests in the Belfast area were also notified of the proposal.

On the same day, an Equality Impact Assessment was published on HMRC’s external website, detailing the proposal and inviting public comment on any equality impacts arising from it.

HMRC also wrote directly to Local Authority representatives in Belfast, Antrim and Lisburn and 10 equality organisations, inviting comment on the proposal. In addition, adverts were published in three Northern Ireland newspapers to encourage public participation.

The public, HMRC staff and unions were invited to comment on the proposals in accordance with Section 75 of the NI Act 1998. The consultation took place over a 10-week period starting on 19 September 2007 and ending on 27 November 2007.

1.1 The consultation document and process

The Equality Impact Assessment (EQIA) was drafted within the context of HMRC’s Equality Schemes and HMRC’s policy on EQIA. The equality groups that have been considered are: Racial Group, Disability, Gender, Age, Marital Status, Persons with Dependents, Sexual Orientation, Religious Belief and Political Opinion (Northern Ireland only).

We sought guidance and advice on this EQIA and the related consultation process from the Equality Commission for Northern Ireland.

The purpose of the EQIA was to highlight known and potential impacts arising as a result of HMRC’s proposal to reshape its estate within Belfast, Antrim and Lisburn in order to inform mitigating action that may be required.

The consultation document invited any external bodies, individuals, HMRC staff and unions to contribute their views and feedback.

Respondents were able to email their views to a dedicated mailbox.

All comments submitted were recorded and analysed by Workforce Change. This report is prepared by Workforce Change and aims to be a summary of the main points raised by the respondents. The official HMRC response to the EQIA consultation will be published on HMRC's internal and external websites once decisions have been made.

Summaries of comments received from external parties, including elected representatives, will form part of the Impact Assessments published at the conclusion of the review's feasibility phase.

NOTE

This document is a summary of the main views of staff and unions. It does not give an HMRC response to the points raised.

Workforce Change, in conjunction with HMRC executives and Business Units, will consider the points raised as part of the decision-making process.

1.2 Encouraging participation

To enhance people's interest in participating in the consultation, the following were arranged.

- The document was published externally on the HMRC Better Regulation page on the internet.
- The document was published internally on the HMRC intranet and HMRC staff were invited to comment.
- The document was sent to DTUS.
- The document was sent to the HMRC Diversity Network coordinators.

The document was posted to 10 equality organisations in Northern Ireland who were invited to meet with HMRC to provide face-to-face feedback on the EQIA. Four organisations requested meetings and these were held in Belfast at the end of October 2007.

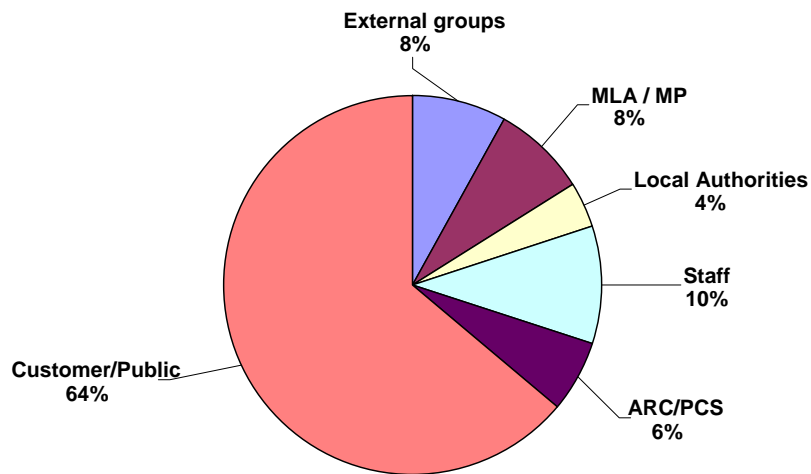
Adverts were placed in the Northern Ireland press: the News Letter, Irish News and Belfast Telegraph on 20 September 2007 seeking feedback to the EQIA consultation.

1.3 Number and timing of responses

There were 51 responses received representing the views of 449 people.

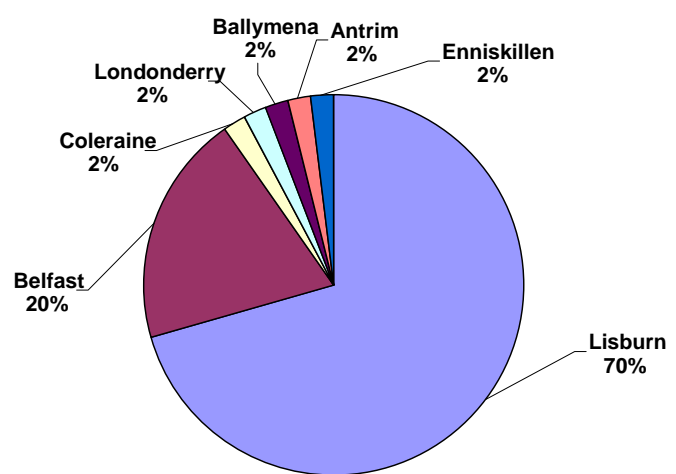
Detailed responses were received from the two trade unions, ARC and PCS, who represent the majority of HMRC staff in offices in the Belfast urban centre.

Respondents by category



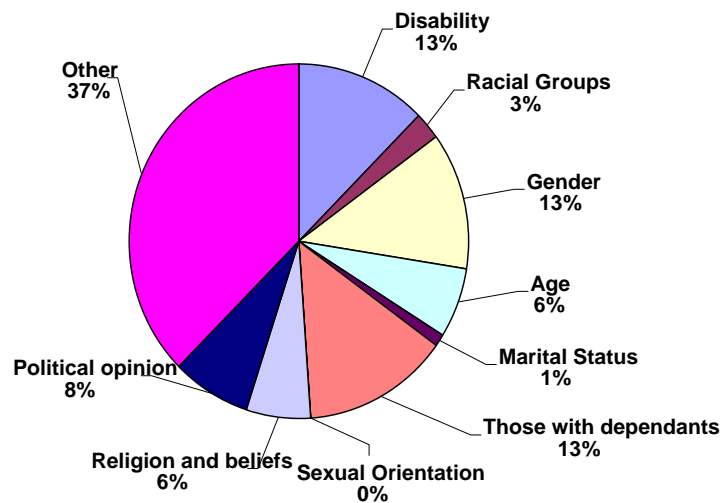
70% of the responses focused on potential equality and non-equality impacts arising from the proposed closure of Moira House in Lisburn.

Respondents by location



A significant proportion of responses (37%) related to impacts other than equality, in particular issues relating to the proposed closure of Moira House. Of the nine equality groups those that generated the highest number of responses (13% each) were the people with dependants, disabled and gender groups.

Responses by Equality Group



1.4 About the respondents

Most comments were from individuals but a number were received from groups including one response from a football club representing over 300 members and a petition from a local rotary club with 14 signatures. Comments were also received from equality organisations.

2 Summary and samples of responses received

2.1 Racial Group

The EQIA document stated that 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. Any impact on customers of different racial groups was expected to be minimal. HMRC did recognise that increasing numbers of Eastern European migrants were moving to Northern Ireland and using the Enquiry Centre services.

Questions asked in the consultation

- 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?

Summary of the responses received

Some respondents raised concerns about the potential adverse impact on customer service given the high volume of migrant workers who visit the Enquiry Centre in Lisburn and who depend on the face-to-face help they receive.

“The social make up of Belfast and Lisburn is changing as is the rest of Northern Ireland. We have an increase of migrant workers who have their own particular needs and may rely on our face-to-face facilities.”

2.2 Disability

The EQIA confirmed that 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 either Moira House, or from an alternative location nearby. In the event of a relocation, the needs of customers with a disability will inform and influence the decision on any new site for 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.

The EQIA recommended improvements to be made to the internal monitoring of diversity data. It recognised that there may be an adverse impact on HMRC staff with a disability if asked to relocate from their current office and confirmed that managers will work closely with employees and HR specialists to identify reasonable solutions to any issues that may arise. No jobs will be lost directly as a result of this proposal and employees will not be expected to commute outside of reasonable daily travel. HMRC believes it has adequate HR policies and specialist support in place to mitigate any adverse impact on individuals and asked for the public to comment on whether the impacts on people with or without a disability had been correctly identified, what additional impacts might arise from the proposal and how could the risks be reduced.

Questions asked in the consultation

- 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?

Summary of the responses received

Many respondents raised concerns about HMRC staff with disabilities having to travel longer distances to work as a result of relocation and they have commented on the limited disabled facilities in the buildings proposed for retention. A number of people stated it is essential that meeting rooms in all office buildings being retained have disabled access for both HMRC staff and customers. Some respondents had concerns about hot desking especially for those disabled HMRC staff who require specialist equipment or have specific requirements. Concerns were also raised on the potential adverse impacts on customers and HMRC staff with a disability particularly if on-site car parking availability is restricted.

Some people were concerned about the adverse impact on employees with a disability who use public transport to get to work if the services to the new location are inadequate. They also raised the issue that people with disabilities may be unable to use public transport. Many highlighted the requirement for good transport links when considering relocation of an Enquiry Centre. HMRC staff and unions stated that it was important that all reasonable adjustments to work stations were

made promptly when staff with a disability were moving office. Feedback from one of the external organisations focused on customers with learning difficulties and highlighted the fact that those people would find telephoning Contact Centres or using the internet very difficult. This organisation confirmed that people with learning difficulties prefer face-to-face advice.

Another organisation urged that home working be considered where possible for members of HMRC staff with a disability. They suggested that staff and managers should receive training to raise awareness of disability issues.

“It will be important to take account of the duty to make reasonable adjustments in the design and working arrangements.”

“For some people with disabilities even moving a few streets could be difficult if they have mobility problems.”

“Car parking is an important issue for customers and staff with a disability. Having a car park space that is close to an HMRC office could help customers and staff with a disability move more easily.”

2.3 Gender

The EQIA confirmed that HMRC employs a higher proportion of female employees than male, which is reflective of the local population.

Of the employees in Belfast, Antrim and Lisburn, HMRC employs 18% on a part-time contract and 89% of these employees are female. In Lisburn HMRC’s 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. The EQIA acknowledged 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 outside reasonable daily travel and for those experiencing increased travel times. HMRC recognises the importance of providing reasonable options for changing working patterns.

Questions asked in the consultation

- 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?

Summary of responses received

Some respondents highlighted that, in Northern Ireland, 60% of women who work full-time are employed by the public sector. The majority of respondents stated that the potential closure of Moira House, Lisburn would affect female part-time workers who have caring responsibilities. Many believe that extra time spent travelling as a result of relocation would impact negatively on their work-life balance.

A number of people expressed concern that some female staff may incur additional travelling and childcare costs and may have to change their working pattern, reduce their working hours or leave HMRC to maintain their current domestic or care arrangements.

“If the proposed closure goes ahead I may have to consider reducing my hours as the journey would be outside reasonable daily travel.”

“In Northern Ireland more than half of female full-time jobs are in the public sector.”

2.4 Age

The EQIA confirmed that 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 EQIA stated that the needs of elderly customers would inform and influence the decision regarding any relocation of Enquiry Centre services.

No jobs will be lost directly as a result of this proposal and it is expected that HMRC employees will relocate within the Belfast area and within reasonable daily travel of their home. The impact on employees of different ages is expected to be minimal.

Questions asked in the consultation

- 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?

Summary of the responses received

Many respondents said that elderly customers rely on the face-to-face assistance given at Enquiry Centres and some highlighted that any potential relocation of the Enquiry Centre in Moira House, Lisburn, would need to take into consideration those elderly customers who require easy access to these services.

A number of respondents believe that staff who have been employed by HMRC for many years may find their skills are not easily marketable if forced to seek alternative employment.

An external organisation highlighted the fact that a move from Antrim or Lisburn may potentially impact both young and old HMRC employees. They suggested that younger HMRC staff would be more dependent on public transport while older employees may be working reduced hours before they retire. The organisation further stated that as HMRC staff may receive assistance with additional travelling costs for a period of time it was important to ensure that staff were made fully aware of flexible working arrangements.

“A move from Antrim or Lisburn may have an impact on the grounds of age. This has the potential to impact younger workers who are more likely to be at the end of the pay scales and more likely to depend on public transport. This also has the potential

to impact on older workers who may be working reduced hours in the period before retirement.”

2.5 Marital Status

The EQIA document stated that 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.

The EQIA confirmed that 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.

Questions asked in the consultation

- 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?

Summary of responses received

Some respondents raised concerns about the possible adverse impacts on marriages because of potential financial hardships experienced as a result of increased travel costs brought about by moving offices.

“Financial worries have the force to cause marriage break up and emotional distress.”

2.6 Persons with Dependents

The EQIA document recognised 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 HMRC 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.

The EQIA document stated that when employees are relocated to another building, HMRC will assist employees by reimbursing additional travelling costs for a period of up to three years under the HMRC Daily Travel Assistance rules.

Questions asked in the consultation

- 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?

Summary of responses received

Respondents stated that the proposed closure of Moira House, Lisburn would impact negatively on HMRC's female part-time workers with care and childcare responsibilities and said that this would lead to an increase in childcare and travel costs. Many were concerned that female part-time staff, because of increased travel, may be faced with further reducing their hours or leaving HMRC. Some respondents suggested that increased travelling time would have a negative impact on one-parent families.

A number of respondents believe that childcare provision in Northern Ireland is poor in comparison with Great Britain. They also said that different school systems in Northern Ireland and Great Britain would mean that some holidays and religious festivals also vary which would therefore impact differently on those with dependant children.

Some suggested that people need to be close to their dependants and relocation to another office may take them further away. Many respondents stated that increased travelling for those with dependants would impact on work/life balance.

The lack of infrastructure for young people with learning disabilities when they leave school was raised by one external organisation. They said that this can have a significant impact on parents who may have to reorganise their daily routines when their children reach 16.

Some HMRC respondents expressed concern about their finances as a result of increased travelling costs. They advised that HMRC assistance with increased travelling costs may impact adversely on their entitlement to Tax Credits, that any payments are taxable and would be paid for only three years.

"Childcare provision in Northern Ireland is poor compared with Great Britain."

"Of the employees in Lisburn 32% in part-time contracts could indicate the number of employees who have caring responsibilities. The impact this could have on employees who have dependants could mean increased travelling times and employees incurring additional care costs or requiring a change in their work patterns or hours of work."

2.7 Sexual Orientation

The EQIA document stated that HMRC does not collect data on sexual orientation.

HMRC recognises that employees of different sexual orientation may experience a change in support networks and facilities if relocated to a different building. No jobs will be lost directly as a result of this proposal and it is expected that HMRC 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.

The EQIA confirmed that 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.

Questions asked in the consultation

- 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?

Summary of responses received

No issues specific to sexual orientation were raised during this consultation.

2.8 Religious Belief

The EQIA document stated that HMRC data confirms the majority of employees currently working in our Lisburn office have a Protestant community background.

HMRC data confirms that the Belfast offices have reasonably even numbers of employees from Protestant and Catholic community backgrounds.

HMRC recognises that employees of different religious faith 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.

Questions asked in the consultation

- 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?

Summary of responses received

Some respondents expressed concerns about the accuracy and completeness of HMRC data on community background used to undertake the necessary analysis for this review.

2.9 Political Opinion (Northern Ireland only)

The EQIA document confirmed that HMRC does not collect data on political opinion. No impacts in addition to those referred to in section regarding Religious Beliefs have been identified.

Questions asked in the consultation

- Are there any additional impacts on persons of different political opinions?
- What are they and how can related risks be reduced?

Summary of responses received

Many respondents stated that community background has not been given sufficient weight in the review process and they believe that the proposed closure of Moira House in Lisburn could create an imbalanced adverse impact on HMRC staff from different community backgrounds.

“It is essential for HMRC to make continued efforts to encourage applications from the Protestant community.”

2.10 Other Comments

Summary of responses received

A high number of respondents expressed concern about Belfast being reviewed separately to other areas in Northern Ireland and commented that this approach potentially limits the scope for looking at the distribution of jobs and impacts on the career development of HMRC staff outside the urban centre. They also believe if Northern Ireland had been reviewed as a whole it would have shown a better commitment to the equality agenda and Section 75(NI Act 1998). They stated this approach was endorsed by the Equality Commission for Northern Ireland when the HMRC unions discussed this with them. Many other respondents had concerns that the statutory obligations under Section 75 (NI Act 1998) had not been adhered to although no specific details were given.

The majority of respondents commented on the potential socio-economic impact of closing Moira House and as a result the impact any potential job losses would have on the local economy. They stated that the city of Lisburn is currently undergoing significant economic regeneration and trying to attract new business from both the private and public sector. Many highlighted that the Northern Ireland Assembly is currently trying to ensure there is an even spread of Government jobs throughout Northern Ireland and is encouraging inward investment. Some respondents believe that Lisburn does not have a fair share of Government jobs. An external organisation stated that the location of public sector jobs is relevant for the promotion of equality generally. A number of respondents believe that the Belfast proposals contravene the Assembly’s decentralisation strategy and also their strategies on anti-poverty and social inclusion known as ‘Lifetime Opportunities’ although no specific examples were given.

Respondents in Lisburn said that they are concerned about the loss of local expertise, advice, meetings and convenient office ‘drop offs’ from which they have benefited for many years.

The majority of HMRC staff raised concerns about potential increased travel time particularly for those that may have to travel from Lisburn to Belfast as they stated traffic within Belfast can be extremely congested. Some HMRC staff said that Belfast City Council may introduce a congestion charge.

Some staff stated that the nationally agreed accommodation standards must be adhered to. On the other hand, many are concerned that a “one size fits all” approach would be applied without consideration of actual business needs.

HMRC staff and unions commented on the quality of accommodation in buildings proposed for retention. They stated that the facilities in these buildings such as temperature control, lifts, basic lighting and emergency exits all need to be improved before additional HMRC staff are moved into them.

Business Continuity Planning was commented on by HMRC staff in terms of contingencies needed for acts of terrorism in the city of Belfast. Some staff

suggested that Lisburn office, because of its central location, would be a good contingency office under these circumstances.

NB Some respondents raised issues related to buildings that were outside the scope of the EQIA for the Belfast Area Review. We will include these responses in the EQIA summary report following consultation on the impact of HMRC's proposals to reshape its use of office buildings in the remaining Northern Ireland locations. This review and consultation process will take place later this year.

3 What happens next?

The HMRC Workforce Change team will consider all points raised in this consultation. All responses will be considered alongside other findings from the overarching feasibility study, which is evaluating other critical factors such as IT and estates issues. We will work with the Northern Ireland Equality Commission and with our internal Diversity and Equality Policy team to analyse these responses and to consider and address the concerns raised in recommendations made.

A full response to our consultation exercise will be published on HMRC's external website and internally on the HMRC intranet once final decisions have been made.
