

The Talent Management Programme

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Section 1: Executive Summary

1.1. Action Plan

As a result of this EQIA consultation we will:

1. Continue to monitor the talent management programme with reference to its impact on gender, sexual orientation, disability, age, disability and race using data available on internal management information systems.
2. As part of the application process remind candidates to update their diversity information for all categories on our personnel system, reminding them of the anonymity of the data and importance of their disclosure.
3. Implement a revised process covering nomination for and entry into the various talent pools (Local and National), which will improve and develop the database of information held in respect of participants in the talent pool.
4. Continue to reinforce HMRC Diversity policies and remind all stakeholders from Directors to Grade 6/7 of their obligations. This means ensuring that we both avoid bias and encourage investment in our future capability.
5. Continue to monitor any trends that may emerge and consult to ensure that selection into the national talent pool is based on merit and not on age.
6. Address concerns about location of posts, mobility, long-hours culture and work life balance by amending the guidance to staff on our intranet pages, expanding the FAQs and clarifying how we broker posts for pool members.
7. Share learning across other development & recruitment schemes to promote talent management to all grades.
8. Share the outcomes of this EQIA with HR Directors and others to ensure diversity and equality issues are addressed.
9. Work with the newly formed Carers Network in order to better understand any issues that might be preventing those with caring responsibilities from applying for or joining the pool.
10. Work with Corporate Responsibility, Diversity & Wellbeing and TUS to research managers built in prejudices and how to deal with them.

1.2. What is an Equality Impact Assessment (EQIA)?

EQIA is one of the ways in which Her Majesty's Revenue and Customs (HMRC) ensures that it meets its statutory obligation to provide equality of opportunity. It is a process which enables us to involve our staff and customers in the formation of our policies on particular issues to assess their impact on our customers.

We want to examine all available evidence and consult with all interested stakeholders to actively:

- apply HMRC's strong diversity and equality policies and commitment to promoting equality
- comply with our legal requirements on equality
- avoid the risk of costs, to people and financially, of discrimination complaints by identifying actual and potential inequalities and taking action to remove or mitigate against them.

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

1.3. The talent management programme

The consultation process highlighted our need to clarify that this EQIA is concerned with a specific talent programme for Grades 6 and 7 who aspire to the SCS. This is only part of the HMRC approach to talent management. We will share lessons learnt between the national and local talent pools that make up this scheme, to ensure that their arrangements are in line with the HMRC strategy for talent management. Both pools draw on the same guidance managed centrally. We will also share lessons learned with other talent programmes. The action to use the outcomes of this EQIA to better influence the operation of the local talent pools is reflected in the Talent Management Action plan at Appendix E

1.4. What is Talent Management?

Talent Management is about enhancing leadership capability across HMRC, covering technical and professional as well as operational delivery, policy delivery and corporate service areas.

In this programme HMRC is investing centrally in a small number of high performing Grades 6 and 7, the grades immediately below Senior Civil Service (SCS) that are judged as having a high potential to perform well in the SCS in the future. We aim to develop in them the knowledge, understanding, skills and experience to enable them to operate effectively at SCS level. A second wider group with SCS potential is being developed within business units rather than centrally. More effective talent management is needed at all levels and HMRC needs to move to a position where our leaders and managers invest more time in the identification and development of talent. For those identified as having potential we need to accelerate their exposure to real business delivery challenges to condition them for more senior roles in due course. In doing so we recognise that talent is an HMRC resource and as with other resources it needs to be managed effectively for business benefit.

1.5. The Consultation Process

We published a [Consultation Document](#) on this EQIA of the Talent Management Programme on 26th June 2009 both internally and externally, with a view to enhancing the final assessment and ensuring that our final recommendations take into account a wide range of views on the subject. In addition we contacted a number of organisations (see Appendix C) directly to draw their attention to the consultation paper.

The consultation period ran for 12 weeks from publication until 18th September 2009, during which time we received a variety of comments, all but one from within HMRC. The majority of comments received concerned diversity and similar issues relating to individual experiences within HMRC, but not directly relating to talent management within either the national or local talent pools. We provided guidance to the people making these comments on how they should take up the matters raised with their own managers. We are grateful to everyone who took the time to read the consultation paper and responded.

A summary of comments raised and our responses to them is at Appendix D.

1.6. Issues/impacts identified

In advance of publishing the consultation paper we had not identified any negative impacts in respect of religion or belief, marital status, sexual orientation, transgender or political opinion (in Northern Ireland) either through analysis of direct monitoring data (where it existed) or through informal consultation. None of the comments received during the consultation period indicated

any major issues, but several suggestions for improvements were made and have been acted upon. These are reflected in the remainder of this report.

Prior to publishing the consultation paper, discussions with Directors, Human Resource Business Partners, our Staff Diversity Networks and later research identified some possible issues and impacts with reference to racial groups, age, disability, gender, and people with/without dependants. The consultation paper set out these impacts along with the arrangements that have been applied (or are planned) to mitigate them, where appropriate. This report concentrates on these issues, taking into account comments received during the consultation period.

1.7. Race:

Whilst we have not identified any specific barriers to race in this talent programme, our analysis of data shows black and ethnic minorities (BAME) are under-represented in the SCS - 3.01% of the known (declared) population of the SCS are from ethnic minorities compared with 4.1% for the Grade 6 population, 5.3% for the G7 population and 7.4% for HMRC as a whole. HMRC has a commitment to increasing the opportunities for ethnic minority staff to reach SCS.

We recognise that this scheme is relatively new and our statistics need to be continually monitored and improved to ensure that no barriers to race exist and that we actively promote equality of opportunity.

Our internal departmental guidance for this talent programme includes a section that emphasises the importance of our diversity strategy and individual responsibility to apply it.

1.8. Disability, Gender, people with and without dependants

Initial feedback indicated that people may be put off applying for the talent programme because of:

- the current location of SCS posts,
- the mobility required in senior grades for many roles,
- the perceived long hours culture.

These factors are likely to have a particular impact on disabled people, women as the primary carers and more generally people with dependants.

1.9. Age

Statistics for this talent management programme show that staff under the age of 50 are more likely to be nominated for the talent pools, although the underlying population of eligible Grades 6 and 7 has 47% staff over the age of 50.

There may be several reasons for this and we are committed to ensuring that there are no unfair barriers for older staff. We do not consider age at the application stage. We are primarily interested in potential, which is considered independently of experience.

1.10. What we will do to help ensure equality of opportunity

We will continue to monitor the diversity statistics of those selected for talent pools and compare them with the underlying Grade 6/7 population. The identification, nomination and selection process for this talent programme is business driven and involves managers at all levels, so we will aim to raise relevant issues with Directors by meeting with them and their Senior Leadership Teams to explain what talent management is and the issues surrounding it. We did this when we first launched the programme but recognise that we need to refresh their understanding.

Where complaints are received we will review both the relevant process and the policy.

Section 2. HM Revenue and Customs (HMRC)

HM Revenue and Customs was formed on 18 April 2005 following the integration of two former Departments – Inland Revenue and HM Customs and Excise. We are here to ensure the correct tax is paid at the right time, whether this relates to payment of tax received by the department or entitlement to benefits paid;

2.1. We collect and administer:

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

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

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

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

2.2. We pay and administer:

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

2.3. We protect you by enforcing and administering:

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

Section 3. Statutory Obligations of HMRC

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.

In addition public authorities are required to have due regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

In addition in GB 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 group, 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 transsexual/transgender people)
- 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 (including transsexual people)

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

3.1. HMRC Approach to Meeting the Promotion of Good Relations Duty

HMRC recognises its responsibility to promote good relations in carrying out its activities. This is a key element of our equality screening and EQIA process and we have a positive strategic aim to:

- maintain the strong senior leadership and commitment shown by our Chairman and senior managers in promoting and championing the Equality agenda
- improve the working environment for everyone, so that our employees feel secure, protected from any form of inequality
- promote positive attitudes towards people in different groups through understanding and respect
- make information and guidance available to all areas of the community and make consultation and feedback processes open to all
- promote acceptance of sharing common values and responsibilities,
- interacting with groups of people to achieve common goals and contribute towards community cohesion.

Section 4. Talent Management Programme

We started to develop this HMRC talent management programme in 2006. We developed the policy and produced guidance, following which local talent pools were formed in many directorates or lines of business and we established our national talent Pool, which currently has 57 members (we aim for 50-60 on a rolling basis).

The skills required to be effective at SCS are significantly different from those employed at Grade 6/7, so to better prepare individuals for a future in the SCS individual development needs to cover the knowledge and understanding, skills development and conditioning relevant to future SCS leadership roles.

In practice the manager has a key role in ensuring that individuals with SCS potential are identified, especially in drawing SCS manager/Director attention to people from groups under-represented at SCS level (women, black & ethnic minorities and disabled). Where the ratio of Grades 6/7 to SCS is particularly high, such as Local Compliance, local arrangements have relied most strongly on the manager's input.

Throughout the entire identification, nomination and selection process, all managers must follow HMRC's diversity and equality policy which includes:

- Be the public sector's employer of choice, attracting and retaining the best from the widest pool of talent and developing our people to the level of their potential and inclination.
- Eliminate any unjustifiable discrimination against anyone for any reason, including race, ethnic origin, religion, nationality, sex, sexual orientation, working pattern, marital status, gender reassignment, disability or age.

By addressing the above, managers can help ensure that they identify individuals with 'high' SCS potential based on merit, taking full account of how they perform (delivery and behaviours) and their potential to perform well at SCS.

Where selected for the national pool, development is encouraged through a combination of Career Development centres, Action Learning Sets and a range of workshops/seminars. However, the main development tool is exposure to challenging job experiences and roles. Where the People Function (PF) Talent Team are notified of a suitable job they liaise directly with the job owner, or through Human Resources Business Partners (HR BPs) and HR Directors (HRDs) will identify and broker other developmental and challenging opportunities, such as projects or loans.

Section 5. Evidence Considered

In carrying out this EQIA, HMRC has taken into account a wide range of data and research findings including the following:

1. Representation data from HMRC internal HR systems
2. Process data from HMRC internal HR systems
3. HMRC focus groups
4. Questionnaires to Directors, Human Resource Business Partners, and our Staff Diversity Networks
5. The strategy and direction underlying the CS Diversity and Equality Strategy?
6. Responses received to the consultation paper.

Section 6. Equality Impacts

In February of 2009 we requested feedback from stakeholders, union representatives, external contacts, talent pool members and the Department's staff Diversity Networks on the talent management programme to that date.

The most significant area of feedback focussed on the location of posts, mobility required, long-hours culture and work-life balance. These impacts cut across a number of the groups below. For example, people with dependants, disabled people and people with caring responsibilities.

To address concerns about location of posts, mobility, long-hours culture and work life balance, HMRC are taking forward an action to amend the guidance to staff on our intranet pages, expand the FAQ's and clarify the way in which we broker posts for pool members.

6.1. Persons of Different Racial Groups

Ethnicity data	
	BAME
Known population NTP	10.0%
Known population Grade 6	4.1%
Known population Grade 7	5.3%
Known Population SCS	3.1%
Known population HMRC	7.4% * This is the latest figure at 1/10/09

The declaration of ethnicity is voluntary and statistical analysis is based on the known population. Numbers participating in the scheme are relatively low and the known ethnicity for the grade 6/7 (eligible) population is 71%. We are unable to provide further breakdowns by census groups but will monitor trends at this level.

Ethnic minorities are under-represented in the Senior Civil Service and it is encouraging to see that the percentage of ethnic minority staff in the national talent pool is higher than in the eligible population. However, we recognise that with the small numbers involved these figures are not statistically reliable and could be subject to variation.

The data gives initial indications and further monitoring and analysis needs to be undertaken to fully identify meaningful trends. HMRC employees are encouraged to volunteer information on ethnicity via HMRC’s internal HR systems and we will continue to remind candidates about this.

In advance of the consultation process we did not identify any barriers to ethnic minority groups joining the pool.

We will continue to monitor Equality statistics in order to accurately assess impacts on employees from ethnic minority groups. HMRC has developed a communication strategy to increase the percentage of employees who voluntarily disclose this information. Our strategy aims to reassure individuals regarding the anonymity of data and explains why disclosure of this data is important.

6.2. Disabled and Not Disabled People

Disability Data	Disabled	Not disabled
Known population in NTP	2.7%	97.3%
Known population Grade 6	8.8%	91.2%
Known population Grade 7	10.5%	89.5%
Known Population SCS	6.1%	93.9%
Known population HMRC	16%	84.0%

The declaration of disability is voluntary and therefore statistical analysis is limited to the known population. The declaration rate at October 2009 is 52% for HMRC as a whole, 57% for Grades 6, 58% for Grade 7 and 62% for the SCS.

Whilst these initial figures indicate potential for fewer disabled staff being selected for the talent pools, due to the current declaration rates and numbers of those in the programme so far we cannot report any statistically reliable trends.

In advance of the consultation process we identified location of posts, mobility required, long-hours culture and work-life balance as potential barriers to disabled people joining the programme. Feedback from staff confirmed that these factors could have a greater impact on those with particular disabilities.

Through the active use of reasonable adjustments the PF Talent Team seeks to encourage flexibility and minimise any adverse impact. We have amended our guidance, expanded the Frequently Asked Questions and clarified the way in which people are brokered into posts, including a reminder on the need to consider appropriate and relevant reasonable adjustments.

Further consultation has raised issues around particular disabilities, and we will work with TUS and CRD&W on how best to address these.

We will continue to monitor Equality statistics to assess impacts on disabled employees. HMRC has developed a communication strategy to increase the percentage of employees

who voluntarily disclose this information. Our strategy aims to reassure individuals regarding the anonymity of data and explains why disclosure of this data is important.

6.3. Persons of Different Gender

Gender Data Considered		
	Men	Women
National Talent Pool	46%	54%
Grade 6/7	65%	35%
HMRC 2008 SCS	72%	28%
HMRC 2007 all staff	42%	58%

Women make up 54% of the people in the National Talent Pool and this will potentially help us to meet our obligations under our diversity and inclusion strategy to increase the number of women in SCS posts.

In advance of the consultation process we identified location of posts, mobility required, long hours culture and work-life balance as potential barriers to people joining the pool, particularly those with caring responsibilities, primarily for women. Although the data above did not indicate this was so. Once again the numbers involved are low and not statistically reliable, but no new issues were raised during the consultation period.

We recognise the potential for gender related issues and will amend the guidance, expand the Frequently Asked Questions and clarify the way in which people are brokered into new posts. For example; by making it clear that such issues as people's hours of working and caring responsibilities are considered.

6.4. Transgender

The Department does not hold statistical data on transgender Staff.

No adverse impacts have been identified in talent management through consultation for this group.

We will monitor transgender alongside other issues and respond should there be any specific issues we need to address.

6.5. Sexual Orientation

The Department has recently launched a voluntary and confidential system to enable staff to declare their sexual orientation, including Heterosexual, Lesbian, Gay, Bi-sexual. This will help us to monitor the impact of talent management on people of different sexual orientation.

To date information held is limited but no adverse impacts have been identified in talent management through consultation.

We will monitor sexual orientation alongside other issues and respond should there be any specific issues we need to address.

6.6. Age

National Talent Pool age data						
	16-19	20-29	30-39	40-49	50 +	Total
Men	0%	4%	29%	6%	7%	46%
Women	0%	4%	25%	25%	0%	54%
National Talent Pool	0%	8%	53%	31%	8%	
Grade 6/7 age data						
	16-19	20-29	30-39	40-49	50 +	Total
Men	0%	1%	6%	23%	35%	65%
Women	0%	1%	5%	17%	12%	35%
Grade 6/7 total	0%	2%	11%	40%	47%	
HMRC all staff						
	1%	14%	20%	35%	30%	

The above statistics and our initial consultations have not highlighted any barriers for older staff joining the pool and no new issues were raised during the consultation period.

Current statistics show a greater proportion of people under the age of 50 than over in the pool. There are several possible explanations for this, but we recognise that people of all ages have potential to be successful in the SCS.

We considered data for both gender and age together in respect of the national talent pool. Due to the inadequacy of the data it is not possible to draw further significant conclusions regarding the impact of identification, nomination and selection processes beyond those reported separately above for each factor.

Age is not taken into account when selecting people to join the pool: individual potential is the most important factor. We will emphasise this in our regular contact with stakeholders.

6.6. Persons of Different Marital Status

This category includes married people, unmarried people, divorced or separated people, widowed people, civil partnerships. The Department does not hold statistical data on marital status of staff across all categories.

No adverse impacts were identified for talent management in this regard either before or during the consultation period.

We will monitor marital status alongside other issues and respond should there be any specific issues we need to address.

6.7 Persons with or without Dependants

This category includes those with primary care for a child, personal responsibility for the care of a person with a disability and persons with primary responsibility for the care of a dependant elderly person

Dependants data		
	With dependants	Without dependants
HMRC all staff	41%	59%

The Department does not hold complete data on dependants. The above figures are from a National staff survey in 2006.

In advance of the consultation process we identified that concerns of applicants with dependants were in line with the issues of location of posts, mobility required, long hours culture and work-life balance. The only issue raised was a request for a better definition of what a dependant is.

The programme will continue to be flexible regarding caring responsibilities and related issues. For example due to caring responsibilities a member, at their choice, deferred their place to a later date and others on maternity leave have rejoined the pool on their return to work.

We have amended our guidance and expanded the Frequently Asked Questions to emphasise the flexibility available within the pool, making it clear that such issues as people's personal circumstances are fully considered when we broker a new post/role.

6.8 Persons of Different Religion or Belief

The Department does not hold data on the religion or belief of employees. However in Northern Ireland we do hold data on community background of staff. Due to the small numbers involved the information held for Northern Ireland on community background is too small for inclusion, but we will assess any trends as the programme moves forward and numbers increase.

We recognise that there may be an impact on persons of different religion or belief when implementing the talent programme, such as timing of events. No additional impacts have been identified.

We will ensure that any requests or concerns regarding religion or belief are addressed, for example when planning events.

8.9 Political Opinion (Northern Ireland only)

No data is held on the political opinion of employees.

During consultation the Equality Commission for Northern Ireland suggested that HMRC give further consideration to collecting data on the political opinion of employees. HMRC has some concerns around the sensitivities involved.

The Corporate Responsibility, Diversity and Wellbeing Team will explore the options around collecting data on the political opinion of employees and will involve the Commission in any proposals that HMRC may bring forward.

Talent Team November 2009

Appendix A: HM Revenue & Customs Glossary

BAME	Black, Asian & Minority Ethnic
EQIA	Equality Impact Assessment
HR	Human Resources
NTP	National talent pool
PF	People Function
SCS	Senior Civil Service
TUS	Trades Union Side
VAT	Value Added Tax
WLB	Work life balance

Appendix B: Civil Service Diversity and Equality Strategy

For full details of the Civil Service Diversity and Equality Strategy please follow the link below:

<http://www.civilservice.gov.uk/news/2008/July/Diversity-Equality.aspx>

Appendix C: List of External Organisations contacted

1	Age Concern Northern Ireland	48	North West Forum of People with Disabilities
2	ACOVO	49	NUS USI
3	Barnardos	50	Office of First Minister and Deputy Minister
4	British Deaf Association	51	Omagh Women's Area Network
5	Carafriend	52	Parents and Professionals and Autism
6	Carers Northern Ireland	53	Press for Change
7	Children in Northern Ireland	54	Queer Space
8	Children's Law Centre	55	Royal National Institute for the Blind NI
9	Chinese Welfare Association	56	Royal National Institute for Deaf People NI
10	Coalition on Sexual Orientation (CoSo)	57	Rural Community Network
11	Committee on the Administration of Justice(CAJ)	58	Save the Children
12	Community Development and Health Network (NI)	59	Sense NI
13	Community Relations Council (CRC)	60	The Cedar Foundation
14	Derry Well Woman	61	The Guide Dogs for the Blind Association
15	Disability Action	62	The Rainbow Project
16	Down's Syndrome Association	63	The Women's Centre
17	East Belfast Community Development Agency	64	Traveller Movement Northern Ireland
18	Employers Forum on Disability	65	Unison
19	Equality Coalition	66	West Belfast Econmic Forum
20	Equality Forum NI	67	Women's Forum Northern Ireland
21	Falls Community Council	68	Women's Information Group
22	Fermanagh Women's Network	69	Women's Resource and Development Agency (WRDA)
23	FPA	70	Women's Support Network
24	Gay and Lesbian Youth Northern Ireland	71	Youth Council for Northern Ireland
25	Gingerbread Northern Ireland	72	Equality Commission for Northern Ireland
26	Help the Aged, Northern Ireland		
27	Indian Community Centre		
28	Information Commissioner		
29	Lesbian Line		
30	Magherafelt Women's Group		
31	MENCAP		
32	Multi-Cultural Resource Centre		
33	Newry & Mourne Senior Citizens' Consortium		
34	Newry & Mourne Women Ltd		
35	Newtownabbey Senior Citizens Forum		
36	NIGRA (Northern Ireland Gay Rights Association)		
37	Northern Ireland African Cultural Centre		
38	Northern Ireland Anti-Poverty Network		
39	Northern Ireland Association for Mental Health		
40	NIC-ICTU		
41	Northern Ireland Council for Ethnic Minorities		
42	Northern Ireland Council for Voluntary Action		
43	Northern Ireland Statistics and Research Agency		
44	Northern Ireland Women's Aid Federation Northern Ireland Women's European Platform		
45	NIWEP		
46	NSPCC		
47	North West Community Network		

Appendix D: Summary of comments received and responses

Comment	Action
<p>Individual issues</p> <ul style="list-style-type: none"> Several comments received related to individual's own treatment and opportunities at levels below G6/7. 	<ul style="list-style-type: none"> As these did not relate to the arrangements for the G6/7 talent programme, the subject of this EQIA, we thanked the respondents for their comments and gave advice on how they might take up the issues raised with their own managers.
<p>EQIA</p> <ul style="list-style-type: none"> Make EQIAs mandatory Look at the combination of factors not each in isolation Why has it taken so long to address concerns about location of posts, mobility, long-hours culture and work life balance as key issues? Why are external customers not referred to? 	<ul style="list-style-type: none"> There is a legal requirement for EQIAs and HMRC is meeting it. The EQIA process has been useful in emphasising the interaction of factors and we will continue to review all the factors and address concerns. We have addressed the various issues raised during consultation throughout the consultation period and beyond. The FAQs have been updated to address issues. This programme is for established G7 or G6 staff already in the department, and is therefore of limited relevance to people outside the department. However, we did contact a number of external bodies to draw the consultation paper to their attention.
<p>Wider talent management issues</p> <ul style="list-style-type: none"> What strategies are used to identify individuals who have the potential to reach G6/7? How is HMRC aware of talent at all levels? People develop enhanced skills from outside activities that can equate to SO/G7, but they would not be considered for this talent pool exercise How does talent management interact with other development initiatives? There is no mention of recruitment into G7. 	<ul style="list-style-type: none"> The eligible population for this programme is Grade 6 and 7, but other talent programmes, notably the Fast Programme (Fast Stream and Management Fast Track) and the Tax Professionalism Development Programme, are available to Bands AO/O and above. These programmes prepare people across the core competences/skills for promotion to Grade 7. Some professions have their own programmes The primary responsibility sits with managers to develop all individuals on their teams and have a key role in finding individuals with the potential to progress rapidly through the organisation, encouraging them to apply for development opportunities. People should make have clear development objectives on their PDE. Some Directorates have developed local talent programmes linked to preparation for G7, in addition to the programmes described above. These may be appropriate means for such individuals to progress their careers. We work closely with other teams to exchange information and good practice and share ideas. For example we run joint workshops on Strategic Dexterity with the team looking after SCS Development, support local talent pools in their use of psychometric and other tools and will invite people from local pools to take part in NTP learning events Recruitment is outside the scope of this programme

Comment	Action
<p>The talent programme</p> <ul style="list-style-type: none"> • What is Talent? Need for clear articulation of what talent is and uniformity of standards. • How does assessment of Learning take place? • How do you intend to measure whether the programme is successful? • Can we publish a list of developmental and challenging roles so that people are aware of the jobs they might be putting themselves up for? • Can we give more information on the commitment required to help people decide whether to apply? • Can we produce information on self nomination versus manager identification at the application stage as a test of whether self nomination is working? • How can employees raise queries about non-selection? • Can we monitor statistics from the local talent pools or remove them from the process? 	<ul style="list-style-type: none"> • We will articulate a clearer definition of talent. Currently we say we are looking for people with the potential to rise quickly and perform well in the SCS in the future. The issue is not about whom you may be competing with, but what your potential is. • The programme is focused on development of which learning is a part. All events are monitored internally and reviewed by Talent Managers. • The Institute of Employment Studies is carrying out an independent review to assess the success of the programme. The National Talent Forum considers individual success through progress reports from SCS managers/directors every 6 months. • The jobs that are available vary over time and in response to changing circumstances, therefore publishing a list would be of limited value. • We agree that this would be helpful and we will give more information in our guidance and through FAQs. • By the time we see forms the application has been discussed in depth by the applicant and the manager so both are supportive of the application. The guidance already makes clear how people may express and interest. • Individual's first recourse is to their SCS managers regarding non-nomination. Where an applicant is not selected for the Talent Pool, by the National Talent Forum, we write to them giving reasons why and suggest that they discuss it with their SCS manager and/or Director. We are happy to discuss the matter further with them if required. Beyond that the departmental Resolving Issues process should be used. • We will introduce a modified nomination process for nominations made after January 2010, which will capture information about all who want to be considered and make it easier to monitor statistics overall.
<p>Race</p> <ul style="list-style-type: none"> • What evidence/data or methodology have you used to come to the conclusion that there are no direct observed impacts for people of different racial groups? • What is the BME on a geographical basis; against others promoted; & can these figures go to managers? 	<ul style="list-style-type: none"> • We consulted the Staff Diversity network for Race whose comments were positive and helpful. They did not identify any specific barriers due to this programme. The figures for the pool show that there are more people from ethnic minorities in the NTP (10%) than in either HMRC as a whole (7.4%) or the G6 (4.1%) and G7 (5.3%) population. This suggests that there is no obvious barrier to people from ethnic minorities joining the pool, but because of the size of the pool small changes could significantly alter those statistics. We will continue to monitor trends. • As numbers in the pool are low, breaking the statistics down further is not feasible. We will continue to monitor trends, which will be reported to the National Talent Forum.

Comment	Action
<ul style="list-style-type: none"> • Can there be quotas for BAMEs or can the pool be widened to SO/HO level for BAMEs? • Set up a new staff network for BAME women to support the achievements of targets in this area for women • There needs to be a programme of nurturing talent from very early on. Need to encourage BAME staff below HO level to consider SCS? • Can we have Positive Action plans for BAMEs/disabled staff? • What % of successful applications for G6/7 posts come from internal or external BAMEs? • HMRC to get managers to ask staff to disclose status? 	<ul style="list-style-type: none"> • We do not set quotas for any area of diversity, as to do so could raise concerns regarding positive discrimination. We aim to ensure that those selected are not disadvantaged by any element of the process. This programme is aimed at developing high performing G6/7 staff with the potential to perform at SCS level in the future. The Fast Programme (Fast Stream and Management Fast Track) is open to HO/SO, plus some Directorates have developed their own local programmes that include staff at HO/SO • Outside of this talent programme a new BAME women's network is to be launched across HMRC on the 11th December 2009 • HMRC (CRD&W) is pulling together a summary of what's available for the different diversity strands. HMRC has a BAME co-coaching programme and are planning a BAME mentoring programme for next year. Similarly there is 'Achieving your Potential' which is aimed at all the Networks. There is also monitoring of BAME representation data on Princes Trust and Spring School. We agree this is an area where HMRC needs to do more and this will continue to be addressed. • We work with all individuals who join the programme to identify the issues and barriers they may face in developing their careers and plan accordingly. The above development programmes are available.. • This is outside the scope of the EQIA. Of 297 G6/7 vacancies in 2008/09 227 were filled internally, of which 6.25% were identified BAME (against a 71.6% declaration rate). 14% of external G7 appointees were BAME, 0% at G6 • HMRC (CRD&W) is actively seeking increased BAME declaration levels from all staff
<p>DISABILITY</p> <ul style="list-style-type: none"> • What is meant by 'disability status' • What is the comparison of G6/7 disabled staff against those selected for talent pools? • There are few Grade 6/7 disabled staff. What are you doing to address barriers keeping a majority of disabled staff at O grade & below? • TUS consider this EQIA does not address the underlying reason why there are so few disabled people to draw from at Grades 6 & 7 	<ul style="list-style-type: none"> • Disability status is intended to enable people to declare if they are disabled or not and is explained on our on-line HR system. Future EQIA documents will explain the term as meaning those who perceive themselves to be covered by DDA. • Figures are given at 6.2. As numbers in the pool are small further analysis is not feasible. We will continue to monitor trends, which will be reported to the National Talent Forum. • This is outside of the remit of this EQIA but is addressed through HMRC development and promotion processes. Our Disability Equality scheme sets out how we intend to identify and address any barriers for disabled staff, this includes the Two Ticks guaranteed interview scheme helps to put disabled applicants on a level playing field when applying for posts and all AA-SO may apply for the development programmes referred to under '<i>Wider talent management issues</i>' above • We discussed this with PCS who confirmed that their key concern is that irrespective of any action taken at a departmental level, managers have inbuilt prejudices and that work needs to be done on removing those. We agree that some research needs to be carried out, but it is difficult to say what and/or when. HMRC will work with TUS on how best to take this issue forward.

Comment	Action
<ul style="list-style-type: none"> • The use of the word ‘overcome’ with disability is <i>far</i> too redolent of the offensive concept of ‘overcoming a disability’ • How will you promote positive attitudes towards disabled people? • How will you ensure that where an adjustment is reasonable, people understand it must be made? • How creatively will reasonable adjustment obligations be applied, such as moving the training to suit the individual? • What practices are in place to ensure that all event/Learning interventions outlined in the EQIA can be made fully accessible? • When will the reasons why disabled members of staff do not apply (location, mobility, long hours) be addressed by amending the guidance and FAQ’s? • The consultation document mentions high energy. This may indirectly discriminate against disabled people • How does the Guaranteed Interview Scheme and Talent Pool interact? • How will HMRC sort out problems with the declaration format that effects self declaration from staff on disability? • Increased declaration rates will not address the issues which really underlie the shortfall of SCS candidates from minority groups 	<ul style="list-style-type: none"> • We will remove any such references. We are seeking to ensure that no high performing individual with the potential to perform well at SCS level is disadvantaged in any way. We will continue to work with managers to help ensure they are properly informed regarding their responsibilities to encourage all staff to develop to their full potential. • Alongside departmental initiatives we will emphasise managers’ responsibility to address diversity issues in our guidance. We will look to develop case studies to better inform individuals and their managers. • Adjustments in the workplace are primarily the responsibility of Line management and this is clear in managers guidance and training. We agree that reasonable adjustments must be made and we will reinforce this message in the talent management guidance and continue working with managers to ensure they are. • For events run in connection with the national talent Pool we take care to consider all diversity issues during planning. Residential events are kept to a minimum and only take place where there is a real need, e.g. at Career Development centres when we are looking to have the Action Learning Sets build rapport and trust. We discuss needs with individuals and are careful to ensure that timing of events make them as accessible as possible and aim to run events in different parts of the country in order to suit as many people as possible, • We take account of the needs of the individuals as part of planning for our events/ learning Interventions; this is a standard approach to organising events within HMRC • We have revised the guidance and updated the FAQs. These should be published shortly and were shared and discussed with TUS before publication as they raised this issue. • Following discussion with TUS we agreed that ‘strong determination’ should replace ‘high energy’. We will change the guidance and the self assessment tool accordingly. • Selection for the pool is not the same as vacancy filling. Individuals start nomination by having a discussion with their SCS managers to consider their aspirations and potential, as a structured conversation around completing a profile form that emphasises individual strengths and development needs. • This is currently under discussion with the People Function Senior Leadership Team. In the meantime we have revised our guidance to remind applicants to the pool to update their details on our online HR system. • We agree, but higher declaration rates help HMRC policy holders to more accurately assess potential impacts. Declaration rates are only one piece of data used to help identify groups of people that may be affected by a policy/proposal. All EQIA work should be evidence based.

Comment	Action
<ul style="list-style-type: none"> What is it about the programme that makes it impossible for someone with caring responsibilities to complete? And why could that aspect not be addressed other than by temporarily excluding the individual concerned? 	<ul style="list-style-type: none"> TUS raised this question and have stressed that their main concern here was not about people with caring responsibilities but that a disabled candidate's circumstances are unlikely to be different in twelve months time and that we need to make it clear that it's not the case that some candidates will be the 'wrong kind of disabled' to participate in the programme at all. It has always been our intention to make the programme accessible to all using a range of solutions and we are happy to confirm this
<p>GENDER AND DEPENDANTS</p> <ul style="list-style-type: none"> How does HMRC assess the number of people discounted because of caring responsibilities? Can we clarify the definition of dependant. Move to dependants section above? How has the conclusion that there are no impacts on transgender staff has been arrived at? 	<ul style="list-style-type: none"> We do not discount people because of caring responsibilities. Everyone who is interested in joining the pool has to make a decision as to whether it is the right thing for them in light anything going on in their lives at any particular time. Once someone joins the pool we work with them to ensure that all events and opportunities are as accessible as possible. Again this comes from Section 75 of the Northern Ireland Act and includes those with primary care for a child, personal responsibility for the care of a person with a disability and persons with primary responsibility for the care of a dependant elderly person Before we published the consultation paper we sought views from a wide range of people including the Transgender network, who did not identify any adverse impacts then or during the consultation period.
<p>SEXUAL ORIENTATION</p> <ul style="list-style-type: none"> How has the conclusion that there are no impacts on LGB staff has been arrived at? There seems to be no commitment to monitor sexual orientation? The Stonewall Leadership Development programme requires definition in the consultation document 	<ul style="list-style-type: none"> Before we published the consultation paper we sought views from a wide range of people including the LGB network, who did not identify any adverse impacts then or during the consultation period. This was an omission. We will continue to monitor the talent management programme with reference to its impact on gender, sexual orientation, disability, age and race using data available on internal management information systems. Stonewall was founded in 1989 by a small group of women and men who had been active in the struggle against Section 28 of the Local Government Act, legislation designed to prevent the so-called 'promotion' of homosexuality in schools; as well as stigmatising gay people it also galvanised the gay community. Stonewall is now the largest gay equality organisation in Europe and continues to campaign for LGB rights.
<p>AGE</p> <ul style="list-style-type: none"> People under 50 are more likely to be nominated for the pool than those over 50. Is the presumption that they no longer need support as they have experience? Disability is likely to increase with age, so will less under 50s have an indirect effect on disabled people? 	<ul style="list-style-type: none"> We do not exclude people from applying on the grounds of age. We focus primarily on potential rather than experience and work with Senior Leadership Teams to ensure they understand what it is we are looking for. We have re-emphasised this in our guidance. This could be an issue, but our numbers are too small for any reliable data to be available. There is an action point in the Disability Equality Scheme (DES) to look at links between age and disability, but as yet HMRC (CRD&W) has not decided how this will be taken forward

Comment	Action
<ul style="list-style-type: none"> The consultation document seemed to suggest older people were less likely to have potential How do we evidence and assure that age is not considered at application? 	<ul style="list-style-type: none"> We had not intended to suggest a bias. Senior managers are asked to identify high performing staff with high potential to perform well at SCS level in the future, which is independent of age. Age is not considered when the nominations are reviewed, emphasis being placed on their recent performance and their manager's and director's view of their potential to develop their capability to perform at a higher level. We do not ask applicants for their age when applying to join the pool and the nomination and profile form is entirely concerned with current performance and potential.
<p>ENSURING EQUALITY OF OPPORTUNITY</p> <ul style="list-style-type: none"> Commitment to a long programme may be difficult but shorter modules may be more achievable. Can we consider allowing breaks in study etc? 'Directors and SCS plus all managers already have responsibility to address diversity issues.' What is being done to make this requirement to address diversity more specific? Bringing in senior-level staff from minority groups from outside in no way addresses the in-house barriers to progression for extant staff from minority groups. What is a "positive action" programmes and what is HMRC policy regarding their use? How many part-timers are there in the National Talent Pool? 	<ul style="list-style-type: none"> The talent programme does not have a formal course structure. The first twelve months is more structured, starting with a residential development centre, thereafter development is driven at the pace of the individual and tailored to their needs. Individuals may be sponsored on formal external programmes but we also provide more flexible alternatives within HMRC. We consider breaks in the programme, or deferred start dates to suit individual needs and will continue to do so. Our guidance highlights the value of a diverse workforce and identifies barriers senior managers should address. In doing so it reinforces the HMRC diversity policies. The programme is only available to established Grades 6/7 within HMRC and is not about external recruitment. The process of identification and selection provides opportunities to all to put themselves forward and consider their potential to take on roles at a higher grade with senior managers. The term 'positive action' refers to a range of approaches designed to counteract the effects of discrimination and to help abolish stereotyping. CRD&W will consider developing a policy There are three part-timers on the pool, 5% of the total.
<p>OTHER ISSUES RAISED</p> <ul style="list-style-type: none"> That HMRC give further consideration to collecting data on the political opinion of employees. It is a myth that the Disability Equality Duty obliges public authorities to promote equality and eliminate discrimination 'between those with and without a disability'. The DED obligations relate to disabled people only. What does 'Different Marital Status' mean? Does this include or exclude Civil Partnerships? Is it only single people? Divorced? Living as married/CP but not actually legally registered? Where is the definition? 	<ul style="list-style-type: none"> HMRC (CRD&W) Team will explore the options around this and involve the Equality Commission for Northern Ireland, who raised the question, in any proposals that HMRC may bring forward. The 'with and without disability' reference comes from NI law – this is part of the standard document and probably needs amendment to make this more clear i.e. what is GB and what is NI. This will be addressed for future HMRC EQIA documents.. Marital status comes from Section 75 of the NI Act 1998 and examples of groups given by the NI Equality Commission are married people, unmarried people, divorced or separated people, widowed people. The equality indicators within the EQIA guidance make it clear that this also includes civil partnerships.

Comment	Action
<ul style="list-style-type: none"> • What processes are in place to ensure that a candidate cannot be successful if he or she does not demonstrate full and sincere commitment to the Department's equality strategy? How will this commitment be tested? From whom will evidence be accepted? • In what way has HMRC actively signed up to leaders UnLtd, what does this look like? 	<ul style="list-style-type: none"> • The PDE is the key and the importance of diversity & inclusion is a strong theme running through the Developing Confident Managers programme for managers. For individuals seeking nomination to the national talent pool we expect SCS managers to identify and address concerns in the first stages of nomination. • We nominated people to join the first programme. We have not sought subsequent applications but we are considering doing so for the future. Many of the opportunities presented by leaders UnLtd are available through other learning interventions we provide through the pool.

Appendix E: Action plan

Action	Date
1. We will raise awareness of talent management and related issues by meeting with Directors and their Senior Leadership Teams to explain what talent management is and the issues surrounding it.	Ongoing ~ we will aim to meet with most SLTs before the next National talent Forum in March/April 2010.
2. We will continue to monitor the talent management programme with reference to its impact on gender, sexual orientation, disability, age and race using data available on internal management information systems and will analyse and use the results for improvement.	Ongoing in particular to tie in with NTF meetings in March/April and September/October
3. We will support HMRC's aim of increasing increase levels of declaration for sexual orientation, disability, age and race in order to have statistically valid information available for analysis, by reminding candidates to update their diversity information for all categories on our personnel system at the time they apply to join the Talent Pool	Reminder included in updated guidance to be published in December 2009
4. We will implement a revised process covering nomination for and entry into the talent pools (Local and National). This will improve and develop the database of information held in respect of participants in the talent pool.	New process included in new Guidance published on the Departmental Intranet in November/December 2009.
5. We will continue to reinforce HMRC Diversity policies and remind all stakeholders from Directors to Grade 6/7 of their obligations. By highlighting the Diversity Guidance on the Talent pages and through discussion with Directors and their SMT.	Reminder included in updated Guidance issued November/December 2009. See also Action Point 1 above.
6. We will clarify what we mean by talent and address concerns about location of posts, mobility, long-hours culture and work life balance by amending the guidance to staff on our intranet pages, expanding the FAQs, and clarifying how we broker posts for pool members.	Guidance and FAQs updated November/December 2009.
7. We will share learning across other development & recruitment schemes, including Local Talent Pools and the PF SCS Career Development Team, to promote talent management to all grades.	Ongoing but we will aim to have a series of meetings set up before the end of the year (2009).
8. Any outcomes of this EQIA will be reviewed and we will work with the HR Directors and others to promote opportunities for improving equality.	Ongoing in particular to tie in with NTF meetings in March/April and September/October and separate discussions with HRDs (timetable??)

<p>9 We will work with the newly formed Carers Network to better understand any issues that might be preventing those with caring responsibilities from applying for/joining the pool.</p>	<p>We plan to contact them in advance of the next National talent Forum Meeting in March/April 2010.</p>
<p>10 We will support research into managers' in built prejudices and how to deal with them.</p>	<p>We will work with CR & Diversity & wellbeing & TUS on how best to take this issue forward by March/April 2010</p>