

EQUALITY IMPACT ASSESSMENT

HOW AND WHERE WE WORK PROGAMME: ROSE COURT HQ RELOCATION PROPOSALS

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EQUALITY IMPACT ASSESSMENT

EXECUTIVE SUMMARY

- 1. This is a provisional equality impact assessment (EIA) of proposals under the HWWW programme to relocate a number of posts from Rose Court to Redgrave Court.
- 2. The final EIA is dependent upon final decisions about the scale and timing of the relocation programme and how it will be implemented.

Purpose of the EIA

- 3. The EIA assesses HWWW proposals for their impact on levels of representation by race, religion or belief, disability, gender, age and sexual orientation. Where there are potentially adverse outcomes for different groups of staff, the EIA proposes action to remove, reduce or mitigate them, wherever reasonable and practicable.
- 4. The impact of relocation on staff is a complex subject, involving a range of factors. Staff may be in several diversity groups (eg an Asian woman with a disability), and every circumstance will not necessarily apply to everyone within each group. Factors apply that cut across the diversity strands, such as household income and educational and professional qualifications. In short, much will depend upon the individual circumstances of staff.
- 5. The report findings are intended to help HSE to consider the potential impact of HWWW on individual members of staff and diversity in HSE; and to prepare plans to support staff through relocation or redeployment.

Race

- 6. There is higher representation of black and minority ethnic (BME) staff at all job bands in Rose Court (15%) compared with Redgrave Court (2%). In Rose Court, BME staff are mainly represented in the bottom two job bands (34 out of 60 staff).
- 7. Fewer people from BME groups live on Merseyside (3%), compared with London (29%). As a result, there are probably fewer community support networks on Merseyside. If BME staff with children relocated, they might be concerned about how their children would settle into

- schools where there are few other pupils from an ethnic minority background.
- 8. In London, there is higher unemployment among people from BME groups (13.5%), compared with white people (5.1%). Although the position is improving, there is evidence that people from BME groups still face discrimination in trying to find employment. If there is discrimination, then it may be harder for BME staff who do not relocate to get another job in London.
- 9. If a number of BME staff decide not to relocate, this would reduce overall levels of representation in HSE. HSE would need to review the Race Equality Scheme, including representation targets, because it may be more difficult to recruit people from BME groups on Merseyside.

Religion and belief

- 10. Staff considering relocation may be concerned that for certain religions it will be harder to access places of worship and faith schools (eg Muslim and Sikh). However, there are places of worship for most religions on Merseyside, or more widely in the North West.
- 11. There is not the same access to faith schools for a number of religions on Merseyside as in London. However access to single-sex schools is sometimes of equal or greater importance, of which there are several on Merseyside.

Disability

- 12. 21 staff (5%) in Rose Court have declared that they have a disability; the same percentage as in Redgrave Court. There is better representation at higher job bands in Rose Court, compared with Redgrave Court.
- 13. There are a number of possible impacts on staff with a disability if they decide to relocate: they would lose well established access to local support networks; a new home might need to be adapted; and it could be harder to access centres of excellence for certain types of specialist healthcare.
- 14. However, Merseyside public transport is good and, more positively, there is reserved car parking for staff with mobility related disabilities, which is not available at Rose Court. Access to office services should be at least as good in Redgrave Court as in Rose Court.

- 15. If a number of staff with disabilities decide not to relocate, this would reduce overall levels of representation. This would need to be considered under the Disability Equality Scheme, but there is no reason why levels of representation could not be rebuilt through recruitment.
- 16. Future recruitment strategies will need to ensure that externally advertised posts are opened up, as far as possible, to the widest possible range of candidates to encourage applications from people with disabilities.

Gender

- 17. There is the same level of representation (48%) of women in Rose Court and Redgrave Court. However, there are more women at SCS to job band 2 in Rose Court (about 35%), compared with Redgrave Court (20%).
- 18. One of the main impacts may be on women who use extended networks of family members and friends to provide childcare support in London, which it would be difficult to replace with alternative arrangements on Merseyside.
- 19. However, the provision of car parking at Redgrave Court helps parents to manage taking children to and from nursery/school with coming to work.
- 20. Fewer women than men might relocate from London to Merseyside for reasons of part-time working (20% of women work part-time compared with 8% of men), childcare support, or because of partners' careers and who may be on higher incomes¹. This would impact on levels of women representation, which would need to be considered under the Gender Equality Scheme.
- 21. There is no reason why current levels of representation could not be rebuilt. Future recruitment strategies will need to ensure that externally advertised posts are opened up, as far as possible, to the widest range of candidates and employment flexibilities offered to encourage applications from women.

¹ This could also apply to male staff with female partners but research indicates that in general male partners still tend to be the prime salary earner.

Age

- 22. There is no evidence that there would be a significant adverse impact on levels of age representation. Fewer "older" staff (usually defined as people aged 50 or over) will probably relocate to Redgrave Court.
- 23. It could be harder for them to find alternative employment in London because of the difficulties older workers encounter in finding jobs. Further, senior staff might find it harder to get jobs in OGDs than younger staff and, instead, consider relocation.
- 24. All staff are concerned about whether they will lose London Weighting on transfer to Redgrave Court. However, for older staff, the concerns are more immediate because London Weighting is included in the calculation of pension entitlements, which is based on salary in the last three years of employment for most staff.

Sexual orientation

- 25. There are no central staff records about sexual orientation, but based on the annual staff survey and work done to help set up a lesbian, gay, bisexual and transgender (LGBT) staff network, we believe there are more LGBT staff in Rose Court than Redgrave Court.
- 26. LGBT staff have concerns about relocating from London to Merseyside. They believe that Liverpool is not as gay-friendly as London in terms of services, community support and personal safety. They have concerns about working in Bootle and Redgrave Court itself.
- 27. If a number of LGBT staff decide not to relocate to Merseyside, this will probably reduce overall levels of representation in HSEs, but we do not hold the staff details to enable us to monitor the impact. HSE will need to develop proposals to promote LGBT equality within the overall diversity strategy.

Mitigation Action

28. HSE will engage professional external agencies to provide relocation and redeployment support. They will offer support to help staff to consider whether to relocate to Merseyside or seek alternative employment in London. They will be briefed to provide support that is tailored to the individual needs and circumstances of staff. Staff will be offered access to one-to-one support.

- 29. HR will publish information on the intranet about health, employment, education, childcare, travel, and religion and how to contact the relevant agencies. In addition, information will be provided about community groups, voluntary and local authority agencies that provide support about race, gender, disability and sexual orientation
- 30. HSE will review its diversity agenda in consultation with the Trade Unions, staff networks, management and staff. HSE will work with OGDs and local authorities and other Merseyside development agencies to promote recruitment of under-represented groups to fill functions as they transfer from Rose Court to Redgrave Court.
- 31. HR will consult the Trade Unions, staff networks and staff to identify issues of concern to help resolve them, wherever reasonable and practicable.

Overall conclusions

- 32. The EIA starts from the position that no other city in the UK is as diverse as London. This is especially true for race, sexual orientation and religion. Similarly, the workforce in Rose Court is more diverse than in Redgrave Court, or anywhere else in HSE.
- 33. The Board decided on 4 July (B/07/70) to opt for a single HQ with a residual policy function in London, and to review where lawyers and social scientists should be located, subject to HSC endorsement. In the short term this could reduce levels of representation in a number of the diversity groups and there could be adverse outcomes for different groups of staff.
- 34. However, the proposed two year timetable gives HSE the opportunity to take effective mitigation action, and to put in place arrangements to support staff to relocate or seek alternative employment in London. HSE will also review its diversity agenda, including the three statutory equality schemes (Race, Disability and Gender) and revise recruitment and development strategies, to improve the diversity of the workforce in Redgrave Court and across HSE.

INTRODUCTION

- 1. This is a provisional equality impact assessment (EIA) of proposals under the HWWW programme to relocate a number of posts from Rose Court to Redgrave Court.
- 2. The final EIA is dependent upon Board decisions about:
 - number of posts to be relocated
 - · types of posts to be relocated
 - timescale for relocating posts
 - and subsequently
 - o how staff will be selected for relocated posts
 - the range of help and support given to staff to help them relocate to Merseyside or to find alternative employment.
- 3. The report is structured as follows:
 - Introduction
 - Background
 - Methodology
 - Race
 - Religion and faith
 - Gender
 - Age
 - Sexual orientation
 - Conclusions.
- 4. The final equality impact assessment also needs to assess the impact of proposals on stakeholders, customers and the public. The functional analysis of which posts should remain in Rose Court will provide some of the information needed.

BACKGROUND

5. All public authorities have a statutory duty to carry out EIAs on policy proposals to see whether they could have an *adverse impact* on the workforce or the public, relevant to race, disability or gender equality. Adverse impact is defined as a significant difference in patterns of representation or outcomes between groups. Although not legally

- required, HSE has carried out EIAs for the other three main diversity strands: religion and faith, age and sexual orientation.
- 6. HSE is therefore required to carry out an EIA on the HWWW relocation proposals. If the proposals could have an adverse impact then, wherever reasonable and practicable, they should be modified to remove or reduce the impact. If there are no other ways of achieving the aims of the particular business proposal, then actions should be taken to mitigate any adverse impacts, wherever reasonable and practicable.

Relocation option

- 7. On 4 July (B/07/70) the Board considered proposals for relocating functions from Rose Court to Redgrave Court. The business case set out the financial and organisational benefits of maintaining two HQ buildings or establishing one HQ on Merseyside.
- 8. The Board decided to opt for a single HQ with a residual policy function remaining in London, and to review where to locate lawyers and social scientists. These proposals will be put to HSC for endorsement in the autumn. The Board also set a target to complete the relocation programme, within two years, subject to securing money from the DWP Modernisation Fund.

METHODOLOGY

- 9. We have researched how other public authorities have carried out EIAs, particularly for relocation; and consulted external experts. We have consulted OGDs about their relocation programmes.
- 10. The main steps followed in carrying out the EIA are listed at <u>Annex 1</u>, which are based on the EIA tool on the diversity pages on the intranet. The main activities are:
 - i. collect and analyse internal staff information (race, disability, gender, sexual orientation, age, and religion and belief)
 - ii. collect and analyse external information about population, and social and economic factors relevant to staff moving home (eg, housing, employment, education and health)
 - iii. consult trade unions, staff networks and staff (via focus groups and email)

- iv. consult other organisations who have relocated staff
- v. develop proposals and recommendations based on analysis and consultation
- vi. publish and communicate the results of the EIA (to be done).

Overall staff numbers

11. Demographic analysis of the workforce has been carried out on HR staffing figures at 31 March 2007.

Status	Job Band	Staff	% of all Staff
Active	SCS	19	4%
(on payroll)	Band 1	28	7%
	Band 2	70	16%
	Band 3	92	22%
	Band 4	99	23%
	Band 5	50	12%
	Band 6	39	9%
Active Total		397	93%
Inactive	SCS	1	0%
(off payroll)	Band 1	1	0%
	Band 2	6	1%
Eg, outward loans	Band 3	6	1%
Career breaks	Band 4	7	2%
	Band 5	4	1%
	Band 6	3	1%
Inactive Total		28	7%
All		425	100%

Table 1: Rose Court HQ staff at 31 March 2007

12. Table 1 shows that there were a total of 425 staff in headquarters functions in Rose Court at 31 March 2007. Of this total, 397 staff (93%) were active or on payroll; and another 28 staff (7%) were "inactive" (7%) – ie, on outward loan/secondment, career break or long term sick². The demographic analysis has been carried out on all 425 staff.

² It will be important to ensure that these staff are included in all consultation exercises linked to HWWW.

Internal research

- 13. We have analysed e-HR data about levels of representation of the different diversity groups in Rose Court and Redgrave Court. Information is held about race, gender, disability, age and working pattern. Central records are not held about sexual orientation, or religion or belief, and these assessments are based on data from the staff attitude survey and the outcomes of staff consultations.
- 14. Discussions have been held with representatives of the three staff networks (race, disability and gender) about issues that could lead to different outcomes for staff in the various diversity groups. General discussions have been held with the Trade Unions. In advance of a LGBT staff network being set up, we informally consulted a group of staff in Rose Court about relocation issues relating to sexual orientation.
- 15. To help consider travel to work patterns and what information needs to be provided about the North West, we have plotted on maps the home post codes of staff in London and on Merseyside. Annex 2 shows that the majority of Rose Court staff live within a 10 mile radius of the office, with a number of staff living in towns just outside but within the area defined by the M25. Annex 3 shows that the majority of Redgrave Court staff live within a 10 mile radius of the office, but with significant numbers living towards Southport.

External research

- 16. We contacted local authorities and other agencies to collect information about living and working in Merseyside³. The information covers:
 - housing
 - · community support and safety
 - crime
 - faith
 - education
 - health
 - employment
 - travel to work.

³ Merseyside covers: Halton, Knowsley, Liverpool, St Helens, Sefton and Wirral

- 17. We have consulted or reviewed information published by a range of organisations to help identify the potential impact of relocation or redeployment on the different diversity strands, including:
 - Office for Government Commerce
 - Office for National Statistics
 - Cabinet Office
 - Commission for Racial Equality
 - Disability Rights Commission
 - Equal Opportunities Commission
 - Department for Work and Pensions
 - various research organisations (eg, Rowntree Foundation, Sigma Health Research and Stormbreak).
- 18. We have consulted departments who have relocated staff: Office for National Statistics (ONS), Her Majesty's Revenue and Customs, and the Met Office.

Findings

- 19. The report brings together internal and external information to help inform assessment and implementation of the HWWW programme, including deciding on the range of support to provide to staff.
- 20. Equality impact assessments are generalisations. It is also a simplification to reduce the analysis of the potential outcomes to whether staff are in a specific diversity strand (staff may be in several strands). Broader socio-economic factors will influence whether staff decide to relocate to Merseyside or seek alternative employment in London.
- 21. Despite undertaking extensive research there are gaps in our knowledge. We could not find direct research about a number of issues. In other cases, the best research available was five years old or more. Finally, in other cases, evidence from different sources gave conflicting messages.

Levels of representation

22. Table 2 shows that 64 staff (15%) in Rose Court have declared they are from a black and minority ethnic (BME) background; 194 staff (46%) have declared they are white; 152 staff (36%) have declined to disclose their ethnic group; and no information is held about another 15 staff (4%).

Job	BN	ΛE	Wh	nite	Non par	rticipant	Unkr	nown	
Band	No.	%	No.	%	No.	%	No.	%	Total
SCS	1	5%	10	50%	4	20%	5	25%	20
Band 1	0	0%	19	66%	9	31%	1	3%	29
Band 2	3	4%	41	54%	32	42%	0	0%	76
Band 3	11	11%	53	54%	30	31%	4	4%	98
Band 4	11	10%	46	43%	44	42%	5	5%	106
Band 5	20	37%	13	24%	21	39%	0	0%	54
Band 6	18	43%	12	29%	12	29%	0	0%	42
All	64	15%	194	46%	152	36%	15	4%	425

Table 2 Staff by ethnic group and job band in Rose Court

- 23. Table 2 also shows that at each grade from SCS to job band 4, BME staff representation is never higher than 11%, compared with representation that is never lower than 43% for white staff. However, at band 5, 37% of staff are BME and 24% are white; and at band 6, 43% of staff are BME and 29% white. Caution is needed with the analysis though because ethnic data is not held for about 40% of staff.
- 24. Table 3 compares levels of representation of BME staff in Redgrave Court with Rose Court. It shows that BME staff are 2% of Redgrave Court staff, compared with 15% of Rose Court staff. In Redgrave Court levels of representation are flat across job bands.

Job Band	Redgrave Court		Rose	Court
	No.	%	No.	%
SCS		0%	1	5%
Band 1		0%	0	0%
Band 2	6	2%	3	4%
Band 3	6	2%	11	12%
Band 4	5	3%	11	11%
Band 5	3	2%	20	34%
Band 6	4	1%	18	43%
All	24	2%	64	15%

Table 3: BME staff in Redgrave Court and Rose Court

Living on Merseyside

- 25. The population of Merseyside is far less ethnically diverse than that London. In 2002/03 people from BME groups were 28.9% of the London population and 2.9% of Merseyside population (ONS 2004)⁴.
- 26. As part of the central Government drive to improve community cohesion, the local authorities on Merseyside have put in place a number of initiatives to improve race equality.

Housing

- 27. Home ownership is generally cheaper on Merseyside than in London for all types of property, and should not be a barrier to relocation. Price differentials have narrowed but are still substantial, particularly at the lower end or the first-time buyers' market. Staff already on the housing ladder might not be encouraged as they may fear losing their housing position and the impact this might have on a subsequent return to London. However, it might encourage junior staff trying to get onto the housing ladder to consider relocation.
- 28. We have no evidence of any significant race related impact issues.

Community support networks

- 29. There is not the same range of community groups on Merseyside as in London, but there are organisations covering most BME groups.
- 30. Research carried out by Chalal (2002)⁵ found that some minority ethnic families are reluctant to move out of established communities because of a wish to maintain their cultural identify, ties to places of worship and fears of being isolated and subject to racist victimisation. However Chalal also reported that minority ethnic families are diverse and in the process of transition; and a reluctance to move diminishes for people from BME groups in higher level or professional jobs.
- 31. The Commission for Racial Equality (2005)⁶ agreed that some indices suggest that relocation might be more problematic for some people than others, but said there was no conclusive research to suggest that BME staff are either more or less willing to relocate than their white colleagues. Much will depend upon individual circumstances and the details of any organisational move.

⁴ ONS. 2004. – Labour Market Trends, October 2004

⁵ Chalal, K,. January 2002. Ethnic Diversity, Neighbourhoods and Housing. Rowntree Foundation, January 2002.

Commission for Racial Equality, 2005. Factoring Race Equality into Relocation, November 2005.

32. *Mitigation action.* HR will publish details of Merseyside based local authority contact points and community support groups on the HWWW website.

Education

- 33. Parents of BME children relocating to Merseyside might be concerned about how their children will adjust to schools where there will be significantly fewer BME pupils, compared with schools in London. There is a lack of reliable data comparing the relative performance of BME pupils in London and Merseyside.
- 34. Cline (2002)⁷ found that overall BME pupils do not have difficulty academically (at key stage 2 and GCSE) or settling into schools where pupils are predominately white, although they occasionally had to contend with racist behaviour. Merseyside schools have put in place initiatives to meet the needs of all pupils from all ethnic backgrounds.
- 35. *Mitigation action.* HR will provide information about local education authorities on the HWWW website.

Employment

- 36. Levels of unemployment are higher for people from BME groups than white people in London. ONS (2007)⁸ reports an unemployment rate of 13.5% for non-white people compared with 5.1% for white people in London.
- 37. The unemployment rates for Merseyside are 16.3% for "non-white" and 6.4% for white people. However the rate for non-white people is unreliable it could be ± 13.5% different to the reported figure. The figures are unreliable because relatively few people from BME groups live on Merseyside.
- 38. The Ethnic Minority Task Force (2004) reported that nationally people from ethnic minorities "continue to face discrimination". The Equalities Review (2007), chaired by Sir Trevor Phillips, said that people from a BME background are 40 percentage points more likely to be unemployed than white people, other factors being equal¹⁰.

⁷ Cline, T, et al. 2002. Minority Ethnic Pupils in Mainly White Schools. University of Luton. July 2002.

⁸ ONS. 2007. Annual Population Survey, July 2005 to June 2006. June 2007 update.

⁹ Ethnic Minority Task Force. 2004. "Equality. Opportunity. Success". Year 1 Progress Report, Autumn 2004.

¹⁰ The Equalities Review. 2007. Fairness and Freedom: The Final Report of the Equalities Review. February 2007

- 39. However, the employment rate of people from BME groups is improving and the chances of obtaining employment increase with higher levels of qualifications. It may though still be harder for BME staff at junior job bands, who do not relocate to Merseyside, to find alternative employment.
- 40. *Mitigation action.* HSE will engage a relocation/redeployment agency to help staff to find jobs in London.

Health

- 41. We have no evidence of any significant race related impact issues. However, staff have raised concerns that some health issues are race related and specialist support provided in London might not be so readily available on Merseyside. However, support might be available more widely in the North West.
- 42. *Mitigation action.* HR will support staff on an individual basis who need more information about the availability of particular types of health care on Merseyside.

Crime statistics

43. Jansson (2006)¹¹ states that people from BME groups have a 2% risk of suffering from a racially motivated crime compared with a 1% risk for white people. Levels of race crime have fallen in the UK but we have not found any reliable figures comparing London and Merseyside.

Travel to work

44. We have no evidence that there are any significant race related impact issues.

Impact

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45. There is higher representation of BME staff at all job bands in Rose Court compared with Redgrave Court. BME staff who relocate to Redgrave Court would work in a far less ethnically diverse workplace.

46. If a number of BME staff decide not to relocate to Merseyside, this would reduce overall levels of representation. This was the outcome of the Met Office relocation¹². If this happened it would reduce overall

¹¹ Jansson, K,. 2006. Black and Minority Ethnic groups' experiences and perceptions of crime, racially motivated crime and the police: findings from the 2004/05 British Crime Survey. Report No. 25/06.

¹² This information was obtained from consultants who worked with the Met Office. There is no centrally held demographic analysis of the impact of relocation on departments and agencies.

- levels of representation in HSE about 30% of BME staff in HSE are based in Rose Court HQ.
- 47. *Mitigation Action*. HSE will review its Race Equality Scheme, including representation targets and recruitment strategies. Because fewer people from BME groups live on Merseyside compared with London, a sustained effort and possibly new approaches will be needed to restore levels of representation.
- 48. *Mitigation Action*. HR will consult MAGNET, the Trade Unions and staff to ensure that the general relocation/redeployment support provided responds effectively to any specific race related issues.

RELIGION AND BELIEF

- 49. HR doesn't hold any information about the religions or beliefs of staff. However, in the 2006 Staff Attitude Survey (nationally) 126 staff said their religion was Buddhism, Muslim, Hindu, Jewish or another. Based on centrally held data about ethnic group it is reasonable to assume that a reasonable proportion of these staff work in Rose Court.
- 50. This equality assessment overlaps with the race assessment to the extent that some BME staff will be religious but not Christian and others will not be religious. Two key areas for the religion and belief assessment are places of worship and education.

Community support – places of worship

- 51. There are places of worship to cover most religions in the North West if not on Merseyside, but coverage is not as extensive as in London.
- 52. *Mitigation action*. HR will publish details of places of worship on the HWWW website.

Education – faith schools

- 53. Staff in London may send their children to a faith school. On Merseyside there are Church of England, Catholic and Jewish Schools, but we have not found schools for any other faiths. More widely in the North West there are some faith schools: eg, there are six Muslim schools in Manchester and 1 in Preston.
- 54. Sometimes, being able to send a child to a single sex school is as important as the availability of a faith school. There are a number of single sex schools on Merseyside.

55. *Mitigation action.* HR will ensure that information about faith and single sex schools is published on the HWWW website.

Impact

- 56. Some London staff might be concerned that there will not be a place of worship or faith school for their religion on Merseyside. This could further reduce the number of BME staff who will consider relocation.
- 57. *Mitigation action*. HR will collect further information about religion and faith by consulting staff via focus groups and individual questionnaires to identify issues where support might be needed.

DISABILITY

Levels of representation

58. Table 4 shows that 21 staff (5%) in Rose Court have declared they have a disability. The numbers are low and limit the analysis, but staff with a disability are better represented at job bands 1 to 3 (10%, 5% and 8%, respectively), compared with bands 4 to 6 (3%, 2% and 5%, respectively).

Job	Declared I	Disability	Not Declare	ed Disability	Unkn	own	
Band	No.	%	No.	%	No.	%	Total
scs	0	0%	15	75%	5	25%	20
Band 1	3	10%	25	86%	1	3%	29
Band 2	4	5%	72	95%	0	0%	76
Band 3	8	8%	86	88%	4	4%	98
Band 4	3	3%	98	92%	5	5%	106
Band 5	1	2%	53	98%	0	0%	54
Band 6	2	5%	40	95%	0	0%	42
AII	21	5%	389	92%	15	4%	425

Table 4: staff with a disability by job band in Rose Court

- 59. The Disability Rights Commission (2007)¹³ says that a fifth of the working age population has a disability. A number of staff who have not previously declared their disability, might decide they now need to come forward because of the HWWW relocation proposals.
- 60. Table 5 shows that 5% of staff at both Redgrave Court and Rose Court have a disability. However, in Redgrave Court they tend to be in bands

¹³ Disability Rights Commission. 2007. Disability Briefing. May 2007.

4 to 6, compared with Rose Court where they tend to be in the higher bands (below SCS).

Job Band	Redgrave Court		Rose	Court
	No.	%	No.	%
SCS		0%	0	0%
Band 1	2	4%	3	10%
Band 2	7	3%	4	5%
Band 3	7	3%	8	8%
Band 4	12	7%	3	3%
Band 5	9	5%	1	2%
Band 6	25	8%	2	5%
AII	62	5%	21	5%

Table 5: Staff with a disability in Redgrave Court and Rose Court

Living on Merseyside

<u>Housing</u>

- 61. Home ownership is generally cheaper on Merseyside than in London for all types of property, and should not be a barrier to relocation. Price differentials have narrowed but are still substantial, particularly at the lower end or the first-time buyers' market. Staff already on the housing ladder might not be encouraged as they may fear losing their housing position and the impact this might have on a subsequent return to London. However, it might encourage junior staff trying to get onto the housing ladder to consider relocation.
- 62. Some staff may have had their London homes adapted because of their disability. It may have taken several years to complete the adaptation and they might be reluctant to go through the same process again.
- 63. *Mitigation action.* HR will publish details of local authority advice points about adapting homes on the HWWW website.

Community support networks

- 64. Staff may have established networks of support in their local community, involving family and friends, which it would take time to replace if they moved to Merseyside.
- 65. *Mitigation action.* HR will publish details of the main disability support groups and local authority advice points on the HWWW website.

Education

- 66. We have no evidence that there are any significant disability related impact issues. However, in initial consultations with members of Equal, they advised that parents of children with visual or hearing impairments in considering relocation would be concerned about finding the right kind of specialist education provision in the North West.
- 67. *Mitigation action.* HR will publish information about local education authorities and contact details on the HWWW website, including contact points for children with special learning needs.

Employment

- 68. Levels of unemployment are higher for people with a disability. The latest Annual Population survey (June 2007)¹⁴ reports that in London the unemployment rate is 12.7% for people with a disability, compared with 7.3% for people without a disability. On Merseyside the equivalent figures are 7.3% and 6.8%. It may therefore be harder for staff with a disability who do not relocate to find alternative employment in London.
- 69. *Mitigation action.* Generally, staff with a disability regard the civil service as a good employer. HR will strengthen links with OGDs to find job opportunities for staff and to discuss their policies for guaranteeing interviews to people with a disability.

Health

- 70. We have no evidence that there will be any significant disability related impact issues. All health authorities and trusts are required to provide services that meet the individual needs of people with a disability. However, at initial consultations we have been advised that if individual members of staff receive specialist treatment at a "centre of excellence" in London, they would be concerned to ensure that they could access the same level of care on Merseyside.
- 71. *Mitigation action.* HR will help staff on an individual basis who need more information about the availability of particular types of health care on Merseyside.

Crime statistics

72. We have no evidence that there are any significant disability related impact issues.

¹⁴ ONS. June 2007. Ibid.

Travel to work

- 73. Merseyside has an extensive public transport system.
- 74. A positive feature of Redgrave Court for staff with mobility problems is the availability of reserved car parking, which is not available at Rose Court. Access to Redgrave Court and services in the building are as good as in Rose Court.
- 75. *Mitigation action.* HR will publish details of public transport groups and local services on the HWWW website.

Impact

- 76. There should not be any issues about working in Redgrave Court that would impact adversely on staff with a disability relocating from Rose Court.
- 77. However, as set out above, a number of issues could impact on staff with a disability if they decide to relocate. Many of these challenges will be beyond HSE's control or influence. Early consultations indicate that a number of staff with a disability will decide not to relocate.
- 78. *Mitigation action*. If members of staff with a disability decide not to relocate this would reduce overall levels of representation. This would need to be reviewed under the Disability Equality Scheme. There is no reason why levels of representation cannot be rebuilt.
- 79. Future recruitment strategies will need to ensure that externally advertised posts are opened up, as far as possible, to the widest possible range of candidates to encourage applications from people with disabilities.
- 80. *Mitigation action*. HR will consult Equal and HSE Trade Unions to ensure that the range of support offered to staff will meet the needs of staff with a disability.

GENDER

Levels of representation

81. Table 6 shows there are 203 (48%) women and 222 (52%) men in Rose Court. At SCS to job band 2, women are 33% or more of the staff in each band; 41% at band 3; 51% at band 4; and 76% and 64% at bands 5 and 6, respectively.

	Wor	men	M	en	
Job Band	No. %		No.	%	Total
scs	7	35%	13	65%	20
Band 1	11	38%	18	62%	29
Band 2	25	33%	51	67%	76
Band 3	41	42%	57	58%	98
Band 4	51	48%	55	52%	106
Band 5	41	76%	13	24%	54
Band 6	27	64%	15	36%	42
All	203	48%	222	52%	425

Table 6 staff by gender and job band in Rose Court

82. Table 7 shows that the overall levels of representation of women in Redgrave Court and Rose Court are the same (48%). However, in Redgrave Court there is lower representation of women at SCS to job band 3. The largest gap is at band 2, where women are 15% of the band in Redgrave Court and 33% in Rose Court. In Redgrave Court there are relatively more women at bands 4 and 6, and fewer at band 5.

Job Band	Redgra	ve Court	Rose	Court
	No.	%	No.	%
scs	4	21%	7	35%
Band 1	10	20%	11	38%
Band 2	38	15%	25	33%
Band 3	93	35%	41	42%
Band 4	100	58%	51	48%
Band 5	131	70%	41	76%
Band 6	219	73%	27	64%
All	595	48%	203	48%

Table 7: Representation of women in Rose Court and Redgrave Court

83. Table 8 shows that 38 women (19%) and 16 men (7%) work part-time in Rose Court. Relatively more women work part-time at all job bands, except at band 5, where 2 men (15%) and 3 women (7%) work part-time. It is expected that fewer part-time staff than full time staff would take up any offer to relocate.

Job Band	Female		N	lale .	Т	otal
	No.	%	No.	%	No.	%
SCS	3	43%	1	8%	4	20%
Band 1	2	18%	1	6%	3	10%
Band 2	6	24%	4	8%	10	13%
Band 3	11	27%	6	11%	17	17%
Band 4	6	12%	2	4%	8	8%
Band 5	3	7%	2	15%	5	9%
Band 6	7	26%	0	0%	7	17%
All	38	19%	16	7%	54	13%

Table 8: part-time working in Rose Court

- 84. The willingness of part-time staff to consider relocating will depend, among other things, on how many hours they work. In Rose Court 18% of women who work part-time do less than 20 hours a week; 55% do between 20 and 29 hours; and 26% do 30 hours or more.
- 85. Green (2003)¹⁵ in research on the impact of relocation on families found that a typical company "relocatee" would be male, under 40 years, married, less likely to have dependent children, be in a higher level role and qualified to at least NVQ level 3.

Living on Merseyside

Housing

86. Home ownership is generally cheaper on Merseyside than in London for all types of property, and should not be a barrier to relocation. Price differentials have narrowed but are still substantial, particularly at the lower end or the first-time buyers' market. Staff already on the housing ladder might not be encouraged as they may fear losing their housing position and the impact this might have on a subsequent return to London. However, it might encourage junior staff trying to get onto the housing ladder to consider relocation.

¹⁵ Green A E & Canny A., 2003. Geographical Mobility: Family Impacts. Rowntree Foundation, May 2003

87. There is no evidence of any significant gender related impacts.

Community support networks

- 88. From initial consultations a major issue for a number of women is childcare support. The responsibility for child care (and eldercare, which can further limit the opportunity to relocate) still tending to fall mainly on women. In many cases extended networks of family and friends are relied upon to help. It would probably take time and in some cases it would not be possible for staff to replace this type of support if they relocated to Merseyside.
- 89. *Mitigation action.* HR will publish information about childcare and local authority contacts on the HWWW website, including links to information about childcare salary sacrifice arrangements.

Education

90. We have no evidence of any significant gender related impacts.

Employment

- 91. In London and Merseyside, levels of unemployment are slightly lower for women than men. In London the rates are 7.1% for women and 8.3% for men; and on Merseyside the rates are 5.5% for women and 7.5% for men (ONS 2007)¹⁶. We do not believe these differences are significant.
- 92. In initial consultations, women working part-time (and/or alternative working patterns) have said they would find it difficult to find alternative employment in London with the range of flexibilities offered by HSE, outside the Civil Service. Because of this many of them will try and find employment in another government department in London.
- 93. *Mitigation action.* The general relocation/redeployment support will help staff to find jobs in London.

Health

94. We have no evidence of any significant gender related impact issues.

Crime statistics

95. We have no evidence of any significant gender related impact issues.

¹⁶ ONS, 2007, Ibid.

Travel to work

- 96. The provision of car parking space at Redgrave Court, which is not available at Rose Court, helps parents to manage taking children to and from nursery or school with coming to work.
- 97. We have no evidence of any other significant gender related impact issues.

Impact

- 98. There are similar overall levels of representation of women in Rose Court and Redgrave Court. But there are more women at SCS to band 2 in Rose Court, compared with Redgrave Court.
- 99. HWWW could have a positive effect by increasing the representation of women at senior positions in Redgrave Court. Women relocating to Redgrave Court would work in an environment where there are currently fewer senior women managers.
- 100. Early consultations indicate that fewer women than men might decide to relocate from London to Merseyside. There is a potentially adverse impact on levels of women representation.
- 101. *Mitigation action*. HSE will review the Gender Equality Scheme and look at the future recruitment strategy and career development arrangements for a single Merseyside based HQ. There is no reason why current levels of representation could not be rebuilt.
- 102. Future recruitment strategies will need to ensure that externally advertised posts are opened up, as far as possible, to the widest range of candidates and employment flexibilities offered to encourage applications from women.
- 103. *Mitigation action*. HR will consult the Trade Unions and the Women's Network to ensure that the range of relocation/redeployment support offered meet the needs of all staff, including those who work part-time or have responsibilities as a carer.

Levels of representation

104. Table 9 shows the age distribution of staff in Rose Court. At the "extremes" 47 staff (11%) are under thirty and 151 staff (36%) are aged 50 or over.

	20	-29	30	-39	40-49 50-59		50-5		50-59 >=		
Age	No.	%	No.	%	No.	%	No.	%	No.	%	Total
scs		0%	1	5%	6	30%	13	65%		0%	20
Band 1		0%	4	14%	6	21%	18	62%	1	3%	29
Band 2	2	3%	17	22%	23	30%	30	39%	4	5%	76
Band 3	7	7%	16	16%	36	37%	31	32%	8	8%	98
Band 4	29	27%	28	26%	32	30%	17	16%		0%	106
Band 5	7	13%	11	20%	25	46%	9	17%	2	4%	54
Band 6	2	5%	6	14%	16	38%	16	38%	2	5%	42
All	47	11%	83	20%	144	34%	134	32%	17	4%	425

Table 9 Age distribution of staff in Rose Court.

- 105. There are relatively more staff aged 20 to 29 years at bands 4 and 5 (27% and 13%, respectively); and correspondingly fewer are 50 years or over. For SCS to band 2, relatively more staff are 50 to 59 years old.
- 106. It is difficult to assess whether there would be an adverse impact on a group of staff because of their age. Most external research defines older workers as people aged 50 or over. If fewer "older" staff relocated, this would lower the age profile of HSE. There are no age related diversity targets, although HSE's age profile should in theory broadly reflect that of the UK (working age) population.
- 107. Table 10 shows the comparative age profiles of Rose Court and Redgrave Court. We do not believe there are any significant differences that could lead to age-related issues for staff who relocate to Redgrave Court.

Age Range	Average age	20-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-65
Rose Court	44.3	2%	9%	8%	12%	19%	15%	20%	12%	4%
Redgrave Court	45.1	1%	4%	7%	16%	22%	17%	17%	13%	4%

Table 10: Age profiles of Rose Court and Redgrave Court

Living on Merseyside

Housing

- 108. Home ownership is generally cheaper on Merseyside than in London for all types of property, and should not be a barrier to relocation. Price differentials have narrowed but are still substantial, particularly at the lower end or the first-time buyers' market. Staff already on the housing ladder might not be encouraged as they may fear losing their housing position and the impact this might have on a subsequent return to London. However, it might encourage junior staff trying to get onto the housing ladder to consider relocation.
- 109. There is no evidence of any significant age related impacts.

Community support networks

- 110. "Older" staff might find it harder than "younger staff" to relocate and settle on Merseyside, if they have lived and worked in London for a long time. Green (2003)¹⁷ in research into relocation found that older workers were less likely to relocate. They wanted stability and tended to have well established roots in an area. They might also have responsibility for elderly parents or relatives.
- 111. *Mitigation action.* HR will publish details of all Merseyside based community support groups on the HWWW website.

Education

112. We have no evidence of any significant age related impacts.

Employment

- 113. More older people are now in employment. The unemployment rates for people aged 50 or over are 4.3% in London and 3.7% on Merseyside¹⁸ (ONS 2007). These rates are lower than the overall unemployment rates at 7.7% and 6.6%.
- 114. Research carried out by DWP (2006)¹⁹ found that for a range of jobs employers preferred to recruit staff aged between 24 and 50 years, and Agediscrimination.Info (no date) reproduced ONS statistics showing

¹⁷ Green. 2003. Ibid

¹⁸ ONS. 2007. ibid

¹⁹ DWP. 2006. Metcalfe, H., and Meadows, P. Survey of employers' policies, practices, and preferences relating to age, DTI Employment Relations Research Series No 49.

- that it takes older people longer to find another job following redundancy²⁰.
- 115. *Mitigation action.* The relocation/redeployment support will help staff to find alternative employment. HR will strengthen links with OGDs to help staff find alternative civil service employment.

<u>Health</u>

- 116. Older staff may have more health issues than younger staff, some of which might be covered by the Disability Discrimination Act. However, we have no evidence that there are any significant age related impact issues.
- 117. *Mitigation action.* HR will publish information about healthcare on Merseyside on the HWWW website, and offer more specific information on an individual basis to staff as required.

Crime statistics

118. We have no evidence that there are any significant age related impact issues.

Travel to work

119. We have no evidence that there are any significant age related impact issues.

Impact

- 120. Just over a third of staff in Rose Court are 50 years old or over. Early consultations indicate that few of them will relocate to Redgrave Court. This was also the outcome of OGDs' relocation exercises.
- 121. However, grade seniority generally increases with age and there could be fewer job opportunities for senior staff in other government departments, which may encourage them to relocate to Redgrave Court.
- 122. The main impact of relocation may be to decrease marginally the age profile of HSE. We do not believe this will be significant in diversity terms.
- 123. All staff are concerned about whether they would lose London Weighting if they relocated. However, for older staff, the concerns may

²⁰ Age.discrimination.infoc (no date). [downloaded July 2007]

be more immediate. London Weighting is included in the calculation of pension entitlements, which is based on salary in the last three years of employment for most staff. The loss of London Weighting is also a concern for staff who would consider working temporarily in Redgrave Court during the transition period.

124. *Mitigation action*. HR will consult the Trade Unions and the staff networks to ensure that the relocation/redeployment support package meets the specific needs of older staff; and ensure that it covers the issue of London Weighting.

SEXUAL ORIENTATION

Levels of representation

- 125. There are no central staff records about levels of representation of LGBT staff. However just over 3% of respondents to the 2006 staff attitude survey said they were LGBT. This is probably an under estimate. Stonewall estimates that 7% of the working population are LGBT. This would give a range of 13 to 34 LGBT staff in Rose Court.
- 126. The staff attitude survey results and work done to help set up a LGBT staff network, suggest that there are more LGBT staff in Rose Court than Redgrave Court.

Living on Merseyside

Housing

- 127. Home ownership is generally cheaper on Merseyside than in London for all types of property, and should not be a barrier to relocation. Price differentials have narrowed but are still substantial, particularly at the lower end or the first-time buyers' market. Staff already on the housing ladder might not be encouraged as they may fear losing their housing position and the impact this might have on a subsequent return to London. However, it might encourage junior staff trying to get onto the housing ladder to consider relocation.
- 128. LGBT staff are concerned that they will not be able to find an area to live in that is as gay-friendly as where they live in London.
- 129. There is an absence of definitive research but the Boho Britain Index (2003), cited by consultants King Sturge (2005)²¹ rated London as 3rd

²¹ King Sturge. 2005. Commission for Equality and Human Rights: Location Study. November 2005.

and Liverpool as 12th out of the top 40 cities for the provision of gay friendly services. Nearby Manchester came top in the Index.

Community support networks

- 130. There may not be the same range as in London, but there is an increasing number of groups that provide support to LGBT people in the North West.
- 131. *Mitigation action.* HR will publish details of local LGBT groups and local authority contacts on the HWWW website.

Education

132. We have no evidence of any significant LGBT impact related issues.

Employment

- 133. We have no recent evidence of any significant LGBT impact related issues. The latest research available was undertaken by Stonewall in 1993. It reported that the main problem nationally was harassment in the workplace, rather than discrimination on recruitment.
- 134. LGBT staff have claimed that they might encounter discrimination if they try to find alternative employment in London. They would be concerned about a prospective employer's real commitment to gay equality.
- 135. *Mitigation action.* HR will consult the LGBT network about the relocation/redeployment package to ensure that it meets the needs of LGBT staff.

<u>Health</u>

136. We have no evidence of any significant LGBT related impact issues.

- 137. However in early consultations LGBT staff have said that they face more of a personal challenge when enrolling with a new doctor and health services, because of the stigma attached to sexual health issues. However, Stormbreak (2006) found that LGBT people gave a positive and higher rating to health services in Liverpool, compared with NE London²².
- 138. *Mitigation action.* HR will publish details of health care on Merseyside and support staff on an individual basis who have particular concerns.

²² Stormbreak, 2006. Lesbian, Gay, Bisexual and Transgender Safety in Liverpool: A report on the research findings, December 2006.

Crime statistics

- 139. The incidence of homophobic abuse and physical assaults on Merseyside are a major area of concern for LGBT staff. They are specifically concerned about working in Bootle.
- 140. A survey of gay men carried out by Sigma Research (2005)²³ reported that 29% of respondents had suffered verbal abuse and 7% had been physically assaulted in the previous 12 months in London. This compared with figures 40% and 12%, respectively in Liverpool²⁴.
- 141. Research carried out by Stormbreak (2006)²⁵ for Liverpool City Council found that 59% of interviewees had experienced homophobic crime, mainly in Liverpool area; compared with 53% in North East London and 47% in London as a whole. We do not have information about the position across the North West.
- 142. Mitigation action. HR will publish details about personal safety, local LGBT groups and other related police initiatives on the HWWW website.

Travel to work

- 143. LGBT staff are concerned about whether it is safe to use public transport.
- 144. *Mitigation action*. HR will publish details of local transport groups on the HWWW website, and speak on an individual basis with staff who want further information.

Impact

- 145. If LGBT staff decide not to relocate this will probably reduce overall levels of representation in HSE, but we do not hold central records about sexual orientation to enable us to monitor the impact.
- 146. In consultations LGBT staff said they moved to London as part of a lifestyle choice to live in a gay-friendly city, rather than just to secure employment. They have concerns about living on Merseyside and working in Bootle. They are concerned about whether Redgrave Court is a gay-friendly working environment.

²³ Sigma. 2005. Ibid

²⁴ Stormbreak. 2006. Ibid.

²⁵ Stormbreak. 2006. Ibid.

147. Mitigation Action. HR will consult the Trade Unions and SAGE, the recently formed LGBT staff network to ensure that the relocation/redeployment package meets the needs of LGBT staff, including providing support within Redgrave Court. HR will also discuss with SAGE and the Trade Unions how to include LGBT equality in the proposed review of the diversity agenda.

CONCLUSIONS

- 148. The EIA starts from the position that no other city in the UK is as diverse as London. This is especially true for race, sexual orientation and religion. Similarly the workforce in Rose Court is more diverse than in Redgrave Court, or anywhere else in HSE.
- 149. The preferred option for a single HQ, with a residual policy function in London (and a review of where to locate lawyers and social scientists) could have an adverse impact across the six diversity strands.
- 150. In the short term there could be lower levels of representation of BME staff, women (including part-time workers) in higher job bands, staff with disabilities and LGBT staff. For certain groups, relocating to Merseyside would present significant challenges. However, much will depend on the individual circumstances of staff.
- 151. However, the two year programme timetable and the intention to retain a number of posts in London, provide an opportunity to take effective mitigation action.
- 152. First, HSE, will be able to review its diversity agenda, including the statutory Race, Disability and Gender Equality Schemes, and open up recruitment and development strategies to improve the diversity of the workforce in Redgrave Court and across HSE.
- 153. Secondly, there is time to put in place support mechanisms to help staff to relocate or find alternative employment in London. Staff will be offered one-to-one interviews and tailored support will be provided to respond to individual needs.
- 154. Thirdly, it is proposed to offer flexibilities to staff during the transition period to support the relocation of functions to Redgrave Court, but which will also give staff more time to plan and manage their future careers.

10 STEPS OF THE EQUALITY IMPACT ASSESSMENT – SUMMARISED FOR HWWW PROJECT

Initial screening

- 1. The steps are:
 - i. consider purpose of proposal and potential impact on staff and stakeholders
 - ii. gather evidence relevant to the proposal that is immediately available
 - iii. decide whether the proposal is likely to have an adverse impact on any groups of staff or stakeholders.
- 2. If the answer to 12(iii) is yes then a full impact assessment should be carried out.

Full impact assessment

- 3. The steps are:
 - iv. consider what further information (internal and external) is needed, based on aims of proposal and likely impact on different groups
 - v. based on this further information could the proposal still have an adverse impact, including possibly direct or indirect discrimination against a particular group
 - vi. if there is a potential adverse impact, consider if there are alternative ways of achieving the aim of the proposal. If there are no alternatives show that the proposal is:
 - essential in order to carry out our business;
 - there is no other way to achieve the aims;
 - the means employed to achieve the aims of the policy are proportionate, necessary and appropriate;

- (include information about any mitigation actions that it is reasonable to take to minimise any adverse impacts); and
- benefits far outweigh any adverse effect.
- vii. After this analysis has been considered and an approach has been considered consult trade unions, staff networks and staff (eg, by focus groups or intranet)
- viii. Decide whether to adopt the proposal based on the following factors:
 - aims of the proposal.
 - evidence gathered.
 - results of the consultations.
 - relative merits of any alternatives put forward.
- ix. Set in place measurable monitoring arrangements to monitor the impact of implementation
- x. Publish the results impact assessment, setting out the process followed, and monitoring arrangements.

All staff locations in relation to the Rose Court Office Brackley Banbury Saffron Waden Milton Moreton-n-Marsh Baldock Bunting of Keynes Buckingham 4 AA21 Halstead Stow-on-Bishop's Chipping Great the-Wold Bigester Leighton Buzzan Stevenage Stortford Braintree Norton Dunmow he tenham Colchester Luton Dunstable Stansted Airport Hertford Kidlington Airport The Northlead Aylesbury Oxford St Alpans West Mersei Maldon Chelmsford Witney Lechlade Tharne Chipping on Thames Amershan Cirencester Burnham-en-Crou Abingdon Payleigh Fannodon / Cricklade Southend-on-Sea Beaconsfield mesbury Maldenhead Slough Swindon Canvey Henleyon-Tharres Sheerness Grand penham Reading Isie of Sheppey Calne Hungerford / A4 Thatchan Whitstable Mar borough Newbury Devizes Pewsey Maidstone Ludgershal Basingstoke Sevenoaks Aldersha Andover ster B Farnham Guildford Reigate Ashford Godalming Gatwick 6 Key unbrido Bordon tockbridge Crawley Rose Court Office Tenterden Haslamare Grinslead Hamstreet VIUC Crowborough Horsham Haywards Winchester Billingshurst Heath ackfield New Eastleigh Petersfield Romsey Heathfield Midhurst 10.01 to 25.00 Pulboroug 7 Southampton Battle Horndean ewes **Produced by ONS Geography**

GIS & Mapping Unit, 2007

All Staff locations in relation to the Bootle Office

