

Re-location of National Insurance number interviewing site from Cardiff to Neath

Equality Impact Assessment

October 2011

Equality impact assessment for the relocation of the National Insurance Number Allocation Interviewing Site from Cardiff to Neath

Introduction

The Department for Work and Pensions has carried out an equality impact assessment on the proposal to relocate the National Insurance Number (NINO) Interviewing Site from Cardiff to Neath, assessing the proposal in line with the current public sector equality duties.

This process will help to ensure that the Department has paid due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people from different groups; and
- foster good relations between people from different groups.

The equality impact assessment will show how the Department has demonstrated it has paid due regard when developing new services or processes to on the grounds of the protected characteristics. These are; race, disability, gender, age, gender reassignment, sexual orientation, pregnancy and maternity, religion or belief and marriage and civil partnerships (in terms of eliminating unlawful discrimination only).

Background

Jobcentre Plus works in partnership with HMRC and the UK Border Agency in providing an identity checking interviews for National Insurance number applications.

Further information is available on the DirectGov website

http://www.direct.gov.uk/en/MoneyTaxAndBenefits/Taxes/BeginnersGuideToTax/NationalInsurance/IntroductiontoNationalInsurance/DG_190057

Jobcentre Plus provides a National Insurance number application service.

Most National Insurance Number applications require customers to attend a face-to-face interview at a Jobcentre Plus national insurance interviewing site. These interviews are an Evidence of Identity interview.

Certain National Insurance Number applications use a 'fastpath' provision by using a postal service direct to the NINO centres. These include mainly Seasonal Agricultural Workers, UKBA Visa Postal Applications, Retired Ghurkha Resettlement, NHS employees.

The Secure National Insurance Number (NINo) Allocation Process (SNAP) Guide is used by Jobcentre Plus staff who allocate National Insurance Numbers.

<http://www.dwp.gov.uk/publications/specialist-guides/snap-guide/>

This work is distinct from our core business services which deals with people in receipt of benefits or those seeking employment and is not available in every Jobcentre Plus location. There are 53 interviewing sites of which 5 are in Wales.

Our centralised National Insurance Number (NINO) Hub team are currently based in Caradog House Jobcentre in Cardiff. The majority of these customers applying for National Insurance numbers are not our core business customers who are in receipt of benefits, but are mainly students or employed. These customers only attend for one interview and we will normally reimburse their travel costs. We are considering the work of our NINO team being transferred to Neath Jobcentre due to our current Workforce Management issues and activities within Wales.

Business Rationale for Relocating the NINO Interviewing Site from Cardiff to Neath

As part of a Jobcentre Plus business review a national decision has been made to rationalise some estate. Although this is being done, this is not a reduction of our core services. A national Equality impact assessment has been conducted and published for this. As the closure of Caradog House is part of this a separate Equality Impact Assessment covering this decision has been conducted and published. (<http://www.dwp.gov.uk/docs/jcp-bt-eia-jc-cardiff.pdf>)

This equality impact assessment is concerned only with the relocation from Cardiff to Neath of the National Insurance identity interviews.

We are proposing to relocate the National Insurance Allocation Interviewing Site from Caradog House Jobcentre, which is situated in the centre of Cardiff, to Neath Jobcentre. The rationale for this proposal is that by the end of this financial year our city centre Jobcentres, together with their neighbouring offices in Barry and Penarth, will have difficulty delivering the full range of our core business because of a shortfall in frontline staff. We are forecasting that collectively these sites will have twenty-one people fewer than they need. This situation must be positively addressed to maintain acceptable service standards for customers living in the Cardiff and Vale of Glamorgan Local Authority areas.

The Jobcentre District in South West Wales is currently in a very different position with reference to staffing levels. That District currently has more staff than it earns and the Jobcentre in Neath has the capacity to absorb the additional work associated with the Caradog House Interviewing Site. Our proposal to re-locate the Interviewing Site will allow us to re-deploy staff

currently employed on NINO allocation activities and therefore the use of maximise resources in both Districts.

Data supplied by Nomis (a service provided by the Office for National Statistics) provides the number of core customers living within the Cardiff and Vale of Glamorgan areas:

Jobseeker's Allowance (JSA) – 12,880

Income Support – 7,140

Incapacity Benefit and Employment Support Allowance – 23,410

All customers are required to attend a Jobcentre on at least one occasion. Customers receiving JSA are required to attend a Jobcentre at least fortnightly. Consequently 6,440 JSA customers visit our offices each week for their benefit claim. This compares with approximately ninety customers who attend the Jobcentre at Caradog House each week for a single face-to-face NINO application interview.

It is proposed that responsibility for NINO interviews will be allocated to Neath Jobcentre. The staff currently employed on NINO work in Caradog House includes people that work part-time and equates to 5.27 full-timers, all of whom will be transferred into core frontline roles within the Cardiff area.

Consultation and involvement

We have consulted with both internal and external stakeholders.

Internal Stakeholders

We have consulted with the following:

- Wales Diversity and Equality Manager
- Staff currently employed within the NINO Interviewing Site
- Local Trade Union representative
- The District Manager for South West Wales
- The Isle of Wight Contact Centre which handles and books interviews for the Hub
- NINO Hub managers in South of England Group
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- NINO Hub managers in Central Group
- Senior Manager responsible for the national network of NINO Hubs

External Stakeholders

We consulted with the following organisations via the medium of e-mail on 26 September 2011 and a deadline for response was set at 10th October:

- Citizens Advice Bureaus throughout the district

- Welfare advisers in local authorities – Cardiff, Blaenau Gwent, Torfaen, Vale, Caerphilly, Monmouthshire and Merthyr
- National Health Service
- Carers Wales
- Gofal – mental health and wellbeing charity
- Hospice of the Valleys – charity organisation
- Mind in the Vale – a charity that works with and for people with mental health problems
- Disability and Carers Service
- 4 Winds – user led mental health resource
- Gwalia – provider of social housing
- Llamau – charity working with homeless people
- Tenovus – cancer charity
- Welsh Refugee Council – advice service for asylum seekers and refugees
- Huggard – homeless charity
- Pension Service
- St David's Foundation – hospice care for people with cancer and other life threatening illnesses.
- Merthyr Tydfil Housing Association
- Taff Housing
- Mind – mental health charity
- Adref – housing charity
- The Valleys Regional Equality Council (Valrec) – is an organisation that provides leadership and promotes good practice in the fields of Equality, Diversity and Human Rights
- Medicines and Healthcare Regulatory Agency (MHRA)
- Cardiff and Vale Coalition of Disabled People (CVCDP)
- GTHC – George Thomas Hospice Care
- Penyrenfys – supporting people to overcome problem alcohol and substance use
- DPIA – Dr Minkesh – displaced people in action.

To date we have not received any response.

The following organisations were consulted via the medium of e-mail on 28th September 2011 and a deadline for response was set at 7th October:

- Black Association of Women Step Out (BAWSO)
- South East Wales Racial Equality Council (SEWREC)
- NCC project workers that have a BME / EU migrant remit

- WSMP – Wales Strategic Migration Partnership
- Displaced People In Action (DPIA).

The following organisations were consulted via the medium of e-mail on 29th September 2011 and a deadline for response was set at 7th October:

- Ethnic Minority Communities First Division – Cardiff Local Authority.
- Displaced People in Action (DPIA – covering all parts of South East Wales).
- Oasis – specifically cover the Cardiff Local Authority area but assist any asylum seeker / refugee.
- Oxfam – based in Cardiff with specific projects running in Cardiff and Newport.

Three responses were received. The issues raised concerned migrants and refugees and the cost and distance of traveling to Neath. However, Jobcentre Plus offers the possibility of claiming back travel expenses and a range of reasonable adjustments including home visits. Applicants can determine the time and location of their interview. Some will travel further for a quicker appointment. This is covered further in the mitigation.

Impact of the re-location from Cardiff

Impact on customers

In order to assess the potential impact it is essential to understand customer characteristics. The following data provides this information.

The business review considered the process for NINO applications. The Contact Centre takes telephone calls for the approx 94% of customers applying for a National Insurance Number as they are looking to work, or are currently working in the UK. The Contact Centre agent arranges an interview site for the customer using a Postcode Locator, which gives the first and second nearest locations of National Insurance Number Interview sites for the customer's postcode. The other 6 % need a National insurance number to make a claim for benefit.

A total of 1,358 customers were interviewed during April 2011 – August 2011. Of this total 1,319 were booked as “right to work” interviews; a minority of these were already in employment but the majority were actively seeking employment. Thirty-seven were benefit inspired and two were for student loan applications. Data analysis indicates that 16.9% of applications are made by people with refugee status.

As the available data spans the period April to August 2011 this does not include the full yearly impact of foreign students applying for NINOs as this activity does not generally start until the month of September.

The following table serves to break down the applications received by nationality and whether they were either employment or benefit inspired.

Country of Origin	Total	Employment Inspired	Benefit Inspired	Student Loan Inspired
Australia	4	4	0	0
Austria	2	2	0	0
Bangladesh	4	4	0	0
Belgium	4	4	0	0
Brazil	3	3	0	0
Bulgaria	23	23	0	0
Canada	4	4	0	0
China Peoples Republic	47	46	1	0
Cyprus	5	4	1	0
Czech Republic	64	63	0	1
Denmark	2	2	0	0
Egypt	3	3	0	0
Estonia	3	3	0	0
Finland	1	1	0	0
France	31	31	0	0
Gambia	1	0	1	0
Germany	24	22	2	0
Ghana	3	1	2	0
Greece	16	15	1	0
Guatemala	1	1	0	0
Hungary	72	71	1	0
Iceland	1	1	0	0
India	23	21	2	0
Indonesia	1	1	0	0
Iraq	1	1	0	0
Ireland	65	63	2	0
Italy	38	38	0	0
Jamaica	2	2	0	0
Japan	1	0	1	0
Jordan	1	1	0	0
Latvia	30	30	0	0
Lebanon	1	1	0	0
Libya	7	7	0	0
Lithuania	88	88	0	0
Malaysia	9	8	1	0
Malta	2	2	0	0
Morocco	1	1	0	0
Nepal	3	1	2	0
Netherlands (Holland)	23	23	0	0
New Zealand	1	1	0	0
Nigeria	6	6	0	0
Norway	1	1	0	0
Pakistan	12	7	5	0
Philippines	4	4	0	0
Poland	305	302	3	0
Portugal	35	35	0	0

Romania	107	107	0	0
Russia	4	4	0	0
Saudi Arabia	2	2	0	0
Senegal	1	1	0	0
Slovakia	83	83	0	0
South Africa	1	1	0	0
Spain	55	55	0	0
Sri Lanka	3	0	3	0
Sudan	4	3	1	0
Sweden	8	8	0	0
Switzerland	1	1	0	0
Syria	1	1	0	0
Taiwan	2	1	1	0
Thailand	4	4	0	0
Tonga	1	1	0	0
Turkey	10	10	0	0
Ukraine	1	1	0	0
United Kingdom	74	69	4	1
United States of America	15	12	3	0
Vietnam	3	3	0	0
	1358	1319	37	2

We utilised Bigword to assist with translation services on 582 occasions in 30 different languages.

We clerically analysed customer information relating to NINO applications made between 1st July 2011 and 9th September 2011 for the purposes of identifying the locations from which applications were made. The sample encompassed 909 applications and the geographical breakdown was as follows:

Cardiff	526	57.86 %
Newport	175	19.25 %
Merthyr	53	5.83 %
Bridgend	42	4.62 %
Pontypridd	37	4.07 %
Brecon	30	3.30 %
West of England	24	2.64 %
Abertillery	14	1.54%
Blackwood	8	0.88 %
Ross on Wye	4	0.44 %
Ebbw Vale	4	0.44 %
Total	909	

Of this total 701 (77.11%) customers live within the Cardiff and Newport areas.

Impact on Staff

Personnel working within the NINO Interviewing Site currently total nine (5.27 whole time equivalent) so the new arrangements would change the key responsibilities of a small number of staff members. These members of staff will be offered alternative work suitable to their grade within the Cardiff area. Although their roles would change new line managers are expected to follow Departmental guidance to support staff taking on new or unfamiliar jobs (e.g. reasonable adjustments, technical training, etc). In addition to Caradog House we have two other Jobcentres in close proximity. One site is located less than one mile away and another less than three miles away and both are in easy travelling distance by public transport.

Trade Union Side (TUS) in Wales has repeatedly requested that Management consider opportunities to move work rather than people. TUS are therefore broadly supportive of the principle of re-locating the NINO Interviewing Site to Neath as this will preserve jobs for staff in South West Wales who are currently undergoing a workforce management exercise.

Equality considerations

Equality was considered from the perspective of the staff working in the offices and their line managers.

Staff at the Cardiff interviewing site could move into other Jobcentre Plus work within Cardiff. Although they would change roles, new line managers are expected to follow Departmental guidance to support staff following a change of role (e.g. reasonable adjustments, Display Screen assessment, job training etc).

Whilst we recognised that there will be extended travel times for some customers requiring NINO interviews, we determined that this would not be detrimental to those in protected groups. Contact centre staff are required to consider the individual's needs when booking appointments and take into account departmental guidance around customers with communication needs, vulnerable customer guidance, and issues of accessibility. This means making provision for reasonable adjustments where necessary.

Protected Groups

Age

We do not believe that there is a significant disadvantage from this change to employees due to their age.

A customer's age is not a determining factor in their application for a national insurance number, they are treated the same as any other applicant. We do not analyse applications by age because for most NINO allocation applications their identity interview will be their only contact with Jobcentre Plus. Travelling a longer distance to the interview may be an issue at both

ends of the age scale. Applicants can be any age from 16 to over the state retirement age however; we hope to identify any issues at the booking stage and the call centre operators to will book the appointments to the customer's preference wherever possible.

We do not believe there will be an adverse or disproportionate impact because of their age.

Race

There will be one to ones with individuals and every effort will be made to support employees and ensure appropriate action is taken in moving staff to their new roles.

We do not collect data on customer's ethnicity and the cost of collection is disproportionate to the size of this change. This is because for most NINO allocation applications their identity interview will be their only contact with Jobcentre Plus. We do not believe there will be a direct adverse or disproportionate impact because of their ethnicity however there may be an indirect impact where the customer cannot speak English. For customers with language needs we have in place departmental policies on interpreting and reasonable adjustments, which can be used for booking the appointment and during the arranged interview.

We do not believe that customers will be disproportionately disadvantaged due to their ethnicity.

Gender

There are a higher number of female employees in the department and it is generally recognised that women are more likely to have caring responsibilities; this could have a more disproportionate impact than on men. Any employee with caring responsibilities will be able to discuss their current and future arrangements with their line manager at one to ones. Jobcentre Plus has policies on working hours and working patterns which recognise that home responsibilities do vary.

Data on customer's gender is obtained at the time of booking an appointment. For most NINO allocation applications their identity interview will be their only contact with Jobcentre Plus. We do not believe there will be a direct adverse or disproportionate impact because of their gender however there may be an indirect impact due to caring responsibilities.

In all cases, the customer's preference will be taken into account to ensure that the NINO interview time, date, and location are suitable for the customer.

Disability

Line managers will hold one to one discussion with employees to discuss their move into new roles and identify any additional needs they may have including reasonable adjustments.

There is no data held that shows whether NINO applicants have a disability or health condition. We accept that a longer journey may have an impact on them however, when booking an appointment; customers will be asked about any additional needs including reasonable adjustments due to a disability. In all cases, the customer's preference will be taken into account to ensure that the NINO interview time, date and location are suitable for the customer. Departmental policy covers reasonable adjustments including home visits where necessary. We do not believe there will be an adverse impact due to the changes being introduced.

Religion or Belief

Staff data regarding religion or belief is provided voluntarily and therefore not sufficiently detailed or robust enough to be used for analysis in an Equality Impact Assessment.

Customer data on religion and belief is not currently collected however, we do not believe this change will have an adverse impact on customers and all will be treated equally.

Sexual Orientation

Staff data regarding sexual orientation is provided voluntarily and therefore not sufficiently detailed or robust enough to be used for analysis in an Equality Impact Assessment.

Customer data Sexual Orientation is not currently collected however we do not believe this change will have an adverse impact on customers.

Gender reassignment

Staff data regarding gender reassignment is provided voluntarily and therefore not sufficiently detailed or robust enough to be used for analysis in an Equality Impact Assessment.

Customer data on Gender Reassignment is not currently collected however we do not believe this change will have an adverse impact on customers.

Pregnancy and Maternity

Staff data is not currently available for pregnancy and maternity, however we do not believe that there will be any disadvantage due to pregnancy and maternity of any member of staff in moving job role.

Customer data on pregnancy and maternity is not currently collected however, we do not believe this change will have an adverse impact on customers. Where pregnancy and maternity has an influence on the customers' ability to attend an interview, then this will be taken into account when booking the appointment. In all cases, the customer's preference will be taken into account to ensure that the NINO interview time, date and location are suitable for the customer.

Mitigations

We recognise that re-location to Neath will extend travelling times for the majority of customers. However, we estimate that all but a small number of customers will be able to undertake their one-off face to face interview and complete their return journey within four hours. Newport, Cardiff and Neath are located on a mainline train service and the Jobcentre in Neath is conveniently situated directly opposite the train station. Customers travelling from Newport are able to catch a train direct to Neath where the Jobcentre is significantly closer and easier to locate in comparison with Caradog House which is a fifteen minute walk from Cardiff Central Station.

Trains run regularly from Cardiff Central to Neath at approximately every 15 or 20 minutes. Journey times range between 30 – 50 minutes, with no changes on route. The return fare is currently £8.80. Trains run with similar regularity from Newport to Neath with a journey time of just over an hour and at a current cost of £12.80. However, customers and interpreters are entitled to have their traveling expenses reimbursed. Customers are asked to keep train tickets, bus tickets, car parking and other receipts for expenses incurred for their journey and attach them to their claim form (ACS703JP only).

It is accepted that refugees are vulnerable customers who have experienced trauma in their lives. We also know that NINO customers can find the mandatory face-to-face interview stressful. However, whilst we recognise that there will be extended travel times for the majority of customers requiring NINO interviews, we determined that this would not be detrimental to those in protected groups. The Isle of Wight Contact Centre staff already considers individual needs when booking appointments and take into account departmental guidance around customers with communication needs, vulnerable customer guidance and issues of accessibility. This means making provision for reasonable adjustments where necessary. Interviews will be arranged at Neath whenever this is practicable and acceptable to the customer, with the Interviewing site located at Bristol Jobcentre, Eagle House, St. Stephens Street, Bristol being offered as an alternative location.

NINO customers are able to request an interview at any national site currently offering National Insurance Number interview diaries. There is no legal requirement for customers to apply for a National Insurance Number before starting work and so the scope exists for them to arrange a convenient date taking into account any personal circumstances and arrangements they may need to make. These interviews equate nationally to 94 % of NINO applications. Approx 6% of customers are applications referred from DWP Benefit Teams, Local Authority Benefit Teams and HMRC Tax Credit teams pending an award of benefit or tax credit. These customers are contacted by telephone to arrange an interview at a suitable site, after discussing and taking into account their individual circumstances and preferences. Alternatively, they can be contacted by letter with a telephone number

provided so that customers can discuss any further requirements in more detail.

Home visits can be arranged to complete the interview where there are special circumstances preventing a customer from attending interview sites, for example, where there they have caring responsibilities or a disability. Interviews can also take place on an employer's premises, where they have a large number of staff needing to make an application. Once an interview has been completed the National Insurance Number Centre (in Central Group's case based in the Isle of Wight) will inform the customer of the outcome in writing.

Customers are able to choose the location of their interview to suit their needs and some will travel further for an earlier interview.

Due to the limited contact with Jobcentre Plus, data on customers by protected characteristics is not available and the cost of obtaining this would be disproportionate to the size of the change.

The level of service available to customers will not reduce and the existing provision of national insurance interviews is still available. This includes an option for the NINO hub to consider a home visit to undertake the interviews based on individual customers needs.

The process which enables Jobcentre Plus to consider site visits to employers with large numbers of employees needing a National Insurance Number will remain following any site change.

As with any change of role line managers have a responsibility to ensure that an individual's needs are considered. Line Managers will consider Departmental guidance to support staff following a change of role (e.g. reasonable adjustments, display screen equipment assessment, job training etc).

The change to be implemented is a change which will affect a small number of customers compared to the total number of Jobcentre Plus customers within Wales, therefore the Equality Impact Assessment is considered proportionate to the change.

Monitoring and evaluation

There is ongoing national performance monitoring of the service and its users. The role of the local NINO Interviewing Sites is only to action the interview. Contact centres make the interview bookings and the actual decision on allocating a NINO is made on the Isle of Wight after the customer's attendance.

We will review the impact of this change six months following implementation and will update the equality impact assessment and re-publish it accordingly.

There have been customer requests for different sites for a variety of reasons and these have all been accommodated. However, it is not possible to

ascertain whether these requests were because of an equality related issue. This information is not collated centrally as call centre staff book appointments specifically to customer's preferences. Some customers want earlier appointments and are willing to travel further to obtain these. Appointments are offered across the country and some of these appointments may be outside Wales.

As part of the post-implementation review we will ask our local partnership managers for an update on their consultation with customer representative organisations, the number of complaints received and whether any unforeseen impacts have occurred and how they were handled.

We will continue to monitor any complaints within our geographical remit to see if they are from an equality perspective.

Collection of customer data using the face-to-face interview facility is not available and collection is considered disproportionate to the change.

Next steps

The proposed re-location to Neath is expected to take place within two months.

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