

Ceasing of National Insurance Number interviews at Telford, Boston and Ipswich Jobcentres within Central England Group

Equality Impact Assessment (Revised)

September 2011

Equality impact assessment for a reduction in the number of sites providing National Insurance Number Interviews within Central England

Introduction

The Department for Work and Pensions has carried out an equality impact assessment on the proposal to introduce a change to the location of sites providing national insurance interviews within Central England 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).

Following the restructuring of the Jobcentre Plus Regions, Central Group's National Insurance Number interviewing sites are at 11 locations. Currently these are offered at Birmingham, Telford, Worcester, Hanley, Coventry, Nottingham, Boston, Ipswich, Cambridge, Kings Lynn, and Norwich. The purpose of this project is to reduce the number of National Insurance Number Interviewing sites by ceasing National Insurance interviews at Telford, Boston, and Ipswich Jobcentres. This would mean that the number of interviewing sites within the group would reduce from 11 to 8. The sites still offered for interview would be Birmingham, Hanley, Worcester, Coventry, Nottingham, Kings Lynn, Cambridge, and Norwich within Central England.

These sites have been chosen as they already have a proven record in effectively delivering this work and have the capacity in terms of staffing and space to absorb the extra work.

The reasons for making this change are –

- Enable the staff to improve their skills and experience through handling greater volumes of work.
- Be more efficient and cost effective.
- Ensure Ipswich, Telford and Boston Jobcentres can divert staff from National Insurance Interviewing work to deliver other Jobcentre Plus services
- Provide more flexibility and contingency should any issues arise, by having larger teams.

- due to the reduction in the number of interviews that have needed to be conducted at these sites within the last year
- Standardise the service provided;
- The need for making the change is driven by business need.

The impact of the change means Telford, Boston and Ipswich Jobcentres will not be offered as a location to customers who contact Jobcentre Plus for a National insurance number interview or to benefit customers who require a National Insurance Number to be able to receive Department of Work & Pensions benefits, HM Revenue and Customs tax credits or Local Authority Housing Benefits/council tax benefits. Instead the customer will be offered the nearest alternative sites based on their postcode or preference.

Consultation and involvement

This Equality Impact Assessment (previously published in July 2011) has been reviewed following the receipt of additional comments and an addendum is now attached.

Central Groups Trade Union's have been made aware of the decision.

- Jobcentre Plus Partnership managers will be communicating the changes to relevant community groups who have appropriate interest.
- Jobcentre Plus Contact Centre Directorate will be notified to ensure customers are advised appropriately

Data from the last 12 months April 2010 to March 2011 show number of customers attending the identified sites as –

	Telford		Boston		Ipswich	
	Right to Work applications	Benefit applications	Right to Work applications	Benefit applications	Right to Work applications	Benefit applications
April	133	9	458	13	158	7
May	115	5	429	9	169	7
June	98	12	540	18	188	10
July	127	6	498	9	268	6
August	92	5	615	10	165	7
September	137	9	522	10	228	17
October	119	5	593	17	338	13
November	141	8	558	16	309	14
December	104	12	380	17	199	15
January	79	4	440	2	296	19
February	81	6	393	14	263	22
March	121	5	480	15	258	13
Total for Year	1347	86	5906	150	2839	150

Total customers attending Telford Jobcentre for an interview in last 12 months April 10 to March 11 is 1433, Boston had 6056 in total, and 2989 interviews attended at Ipswich. This compares to the number of customers attending the larger interviewing sites as Birmingham – 16711 and Coventry 8083.

Data shows these sites all have reasonably low number of customers attending for national insurance number interviews. The number of customers who attend for a National Insurance Number interview for the reason of claiming benefit or tax credit is less than 6.4% of the total number of interviews attended at Telford, 2.5% at Boston and 5.3% at Ipswich. These customers are considered to be the group that will be most affected by this change. All other interviews attend are for the reason of obtaining a National Insurance Number due to the right to work in the UK. No data is currently available in protected groups and it would be of a disproportionate cost to do so. However if in the future customers do demonstrate difficulty in attending one of the remaining National Insurance Interviewing sites, a system of interviewing the customer locally will be considered on an individual basis. Data will be kept to ensure there is no disproportionate impact on this.

Efficiency in the use of staff has been considered and management of staff at interview sites including line management of staff at remaining sites in East Anglia is considered to be more efficient with the ceasing of National Insurance number interviews at Ipswich, as currently the Line Management has needed to be provided from Kings Lynn interviewing site following the earlier removal of Bedford as the admin centre covering East Anglia. Interviewing team staff at Telford, Boston, and Ipswich will be diverted to carry out other duties needed within those offices.

The change to be implemented is a change in the function of certain jobcentres which will affect a small number of customers to the total number of Jobcentre Plus customers within Central England, therefore the Equality Impact Assessment is considered proportionate to the change.

Impact of the reduction in the number of sites providing National Insurance Number Interviews within Central England

The impact on staff has been considered and there is no impact from an equality perspective. The staff will be absorbed into the staffing within the Jobcentre they are currently based in.

The impact on customers will be the need to travel to an interview site, which could possibly mean further travel distance to an interview site for a national insurance interview. The nearest available site will be offered to customers contacting the Jobcentre Plus Contact Centre. For benefit customers needing an interview, an interview will be arranged at the nearest National Insurance number interviewing site to the customers home address.

Adjustments can be put in place and will be considered as now, for customers unable to travel to the interview site due to disabilities or health conditions, a home visit can be arranged and for employers with higher number of employees needing national insurance interviews a site visit can be arranged by utilising staff at other National insurance number interview sites within the group.

Interview site remaining as available have been considered and have suitable transport links for road and public transport.

Monitoring and evaluation

The impact on customers, especially benefit customers will be monitored on a regular basis and adjustments made where necessary.

A 6 month overall evaluation will be arranged to consider impact

Next steps

Consider any additional feedback from equality impact assessment.

Arrange for relevant parties to receive communications.

This Equality impact assessment will be reviewed after 6 months based on any data collected to ensure assumptions made for this Equality impact assessment are still relevant.

Contact details

Please contact:

Debi Sifleet

Debi.sifleet@jobcentreplus.gsi.gov.uk

0121 237 8301

ADDENDUM to Equality Impact Assessment for the cessation of National Insurance Number interviews at Telford, Boston and Ipswich

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/>

Business Rationale for ceasing interviews at the selected offices

The Central England Group (region) was established within Jobcentre Plus from what were previously 3 different regions. As part of the Business Review, the Central Group undertook a rationalisation of its business. This review included the National Insurance Number Interview work within the Group.

This review considered that there were 2 NINO Hubs within the Group and a further 9 NINO satellite sites. For the previous year the National Insurance Number target was overachieved at all sites within Central England Group

The numbers of required national insurance interviews had been reducing across the Central Group, which was starting to make small sites less viable. In East Anglia there was an urgent need for more staff to be released to front line Jobcentre Plus services and so improve customer service.

Larger sites offered increased staffing flexibility and provided a better management structure and customer service. Previously for example, Boston satellite site's contingency plans meant that the considerable distance from which emergency cover had to be provided to honour customer appointments when faced with unexpected staff absences and management was provided at Nottingham. This meant additional travel costs and travel time for the manager on a regular basis. The same problem existed for Ipswich with support being provided from Kings Lynn.

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.

Equality considerations

Equality was considered from the perspective of the staff working in the 3 offices and their line managers.

Staff at the interviewing satellite sites could move into other Jobcentre Plus work within their current office location. 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). For the previous line managers, with no change to their base office, this meant a potential reduction in travel time.

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 in the Central Group area 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 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 in the Central Group area, 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 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

As with any change of role line managers have a responsibility to ensure, 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 assessment, job training etc).

Within the Central region NINO hubs there is an adequate geographical spread of mobile NINO interviewing staff that can cover this work.

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 equates 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 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 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 disproportionate to the size of the change. We asked local Jobcentreplus partnership managers to

communicate the message about the change to local community and partner organisations. Feedback suggested there were no issues but this will continue to be monitored.

The level of service available to customers will not reduce and 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 the Hub to consider site visits to employers with large numbers of employees needing a National Insurance Number will remain following any site change.

Monitoring and Review

There is ongoing national performance monitoring of the service and its users. The role of the local Nino hubs 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 processing centre after the customer's attendance.

We will review the impact of this change in the Central Group area during October 2011 and will update the equality impact assessment and republish it accordingly.

So far, we have been able to gather information on where new NINO applicants with an Ipswich postcode have requested to be interviewed since this change in the Central area and it has primarily been in Chelmsford and Norwich.

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 the Central Group area.

As part of the October 2011 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 however continue to monitor any complaints within our geographical remit to see if they are from an equality perspective.

Notes

The staffing numbers for Ipswich, Boston, and Telford Satellite teams

- Ipswich – 3 member of staff (2.49 whole time equivalent)
- Boston – 2 members of staff

- Telford – 3 members of staff undertaking National Insurance Interviews within other Jobcentre duties (1 whole time equivalent)
- Staff diversity information is not provided at site level on numbers less than 5.
- Collection of customer data using the face-to-face interview facility is not available and collection is considered disproportionate to the change.