

Post Office National Insurance Number Application Proof of Concept

Equality Impact Assessment
November 2011

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Introduction

The Department for Work and Pensions has carried out an equality impact assessment on the cross-government initiative to explore opportunities for closer working with the Post Office, assessing the proposal in line with the current public sector equality duties.

This process will help to ensure that:

- the Department's strategies, policies and services are free from discrimination;
- the Department complies with current equality legislation;
- due regard is given to equality in decision making and subsequent processes; and
- opportunities for promoting equality are identified.

Scope of this assessment

This equality impact assessment considers the potential impact of the proposed small scale Proof of Concept trial, with the Post Office, to deliver parts of the National Insurance Number allocation processing, in terms of: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Gender; and Sexual Orientation (i.e. those with 'protected characteristics' as defined under the Equality Act 2010).

This proposal is part of a cross-Government initiative to explore the role the Post Office can play in delivering front end services on behalf of government. This Proof of Concept is one of three Department for Work and Pensions trials with the Post Office; the others are Rural Signing Pilot; and Document Verification for Pension claims.

Brief outline of the process

The National Insurance Number allocation process includes applicants attending the Jobcentre for an evidence of identity interview. When the applicant attends the interview the National Insurance Number application form is completed by the Interviewing Officer who also checks their identity documents to confirm identity and status. The Interviewing Officer will also check the documents for any signs of forgery, manipulation or misrepresentation.

Upon completion of the interviewing activity, the completed application, along with photocopies of the relevant documents is submitted to a processing centre for any further corroborative checks and a decision on the allocation of a National Insurance Number.

For this trial interviews at Bedford Jobcentre, chosen because it has suitable volumes and is within the territory managed by the Director who has the national lead for National

Insurance Numbers within Jobcentre Delivery, will be replaced for a defined group of applicants; by a Check, Validate and Send service available at three Crown Post Offices, Luton, Milton Keynes and Wellingborough.

The defined group of applicants are those for all employment related National Insurance Number applications for a designated set of non United Kingdom European Union/European Economic Area nationals (in-scope applicants). These nationalities were chosen on the basis of risk to the integrity of the National Insurance Number process and the complexity of their applications.

The Proof of Concept trial will begin in October 2011 and will last for three months. In order to evaluate the capabilities and effectiveness of using the Post Office to deliver this element of the National Insurance Number allocation process, this trial will seek to understand the impact on;

- Integrity of the National Insurance Number allocation process
- Customer Service and
- Value for Money.

Consultation and involvement

The Cabinet Office has asked all Departments to consider opportunities for closer working with the Post Office. As a result all Ministers were asked to consider of how the Post Office network could help drive delivery of online services and help to rationalise local office costs. Earlier this year the Department for Work and Pensions and Jobcentre Plus became actively engaged in discussions with the Post Office around the three potential initiatives.

The National Trade Union has been made aware of the decision to work with the Post Office and run this Proof of Concept.

Since this time consultation has taken place with the Post Office to design a proposal to test their capability to deliver elements of the National Insurance Number allocation process.

Regular discussions have take place with Policy, Strategy colleagues and Operational managers. Those operational teams to be involved in the Proof of Concept have attended workshops to help design the process and are actively engaged in the development of products and in particular the evaluation of the trial.

The Department does not have a mechanism to consult applicants about any element of the National Insurance Number allocation process. We have engaged with the Customer Insight team and have developed a customer survey. This will capture the applicant's opinion on the service provided by Jobcentre Plus and the Post Office, including its ease of access. All will be sent the survey with the decision on their application for a National Insurance Number. The outcomes of the survey will be included in the overall evaluation of the Proof of Concept.

Jobcentre Plus Partnership Managers in the Bedford area will be informed of the Proof of Concept should they receive questions from relevant community groups who have appropriate interest.

Impact of the National Insurance Number Proof of Concept Project on Staff

The impact on staff has been considered and there is no adverse impact from an equality perspective.

All Post Office staff involved in the trail will undertake a one day training event delivered by a Jobcentre Plus Learning and Development team. After go live Post Office staff will be supported by local Jobcentre Plus teams who are experienced in undertaking interviews to confirm identity and status and for signs of any forgery, manipulation or misrepresentation. To support the Post Office in identifying signs of forgery, etc., Jobcentre Plus will lend equipment to the Post Office to aide the detection of such items. Throughout the trail staff will be able to contact a member of Jobcentre Plus for advice any suspicions they may have. A dedicated telephone number will be available to cover the hours of service offered by the Post Office for this trial. The effectiveness of the training and support will be measured during the evaluation stage of the trail.

In addition to the support offered by Jobcentre Plus the Post Office will provide each branch with a detailed training guide to support the delivery of the process.

Jobcentre Plus operational teams will be supported by walkthroughs of the process and guidance specific to the trail. Communications will be issued across Jobcentre Plus to inform staff about the trial. Staff at Bedford Jobcentre will continue to interview those applicants not included in the Proof of Concept.

Impact of the National Insurance Number Proof of Concept Project on Customers

Applicants will be selected for the Proof of Concept trial if they;

- live within the Bedford area; and are from one of the non United Kingdom European Union/European Economic Area countries regardless of: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Gender; and Sexual Orientation.
- Are from one of a defined group of European Union and European Economic Area countries.

Following initial contact applicants will be sent the application form, a letter about what to do and where to go and guidance notes to help them complete the application. We will ensure this communication meets accessibility standards.

The impact on applicants need to travel to the Post Office has been considered. The Post Office branches have been specifically chosen as they fall within postcode areas from where we historically have high a volume of applications.

Applicants will be informed of their nearest Post Office and of the others available should they choose to attend a branch for example that is near to their place of employment.

Reasonable adjustments will be considered for customers unable to travel to the interview site due to disabilities or health conditions, a home visit can be arranged. Applicants who are unable to provide an interpreter will be offered an interview as in the normal process.

The Post Office has confirmed that each of their branches involved in the Proof of Concept are compliant with the Equality Act.

The three branches included in the Proof of Concept are all Crown Branches providing the full range of Post Office services. This new Check, Validate and Send service builds on the Passport Check and Send service already offered by the Post Office.

Age

No data available, however, anecdotal historical data exists (see [Appendix 1](#)). We do not expect any adverse impact due to age.

Gender

No data available, however, anecdotal historical data exists (see [Appendix 1](#)). We do not expect any adverse impact due to gender.

Disability

The Department does not currently collect information on disability of National Insurance Number applicants.

The Post Office has confirmed that each of their branches involved in the Proof of Concept pilot are compliant with the Equality Act.

Ethnicity

The Department does not currently collect information on the ethnicity of National Insurance Number applicants. The Proof of Concept trial only applies to National Insurance Number applications for a designated set of non United Kingdom European Union/European Economic Area nationals. All other National Insurance Number applicants living in the Proof of Concept location of Bedford are exempt from the trial and will follow the current allocation process.

Applicants will follow existing process and make the initial application via the Contact Centre National Insurance Number service line. It will be identified at this point if the applicant requires an interpreter. We will follow Jobcentre Plus policy on the use of interpreters— as appropriate/available we will use their interpreter, staff who can speak the language or Big Word.

Following the call, applicants will be sent a letter and application form clearly advising them that if they need an interpreter to complete the process at the Post Office they will

need to take their own along. This is because the Post Office does not have access to interpreting services.

For customers who are unable to do this we will deal with them through the existing interview process at Bedford Jobcentre. This will be identified if the applicant contacts Bedford Jobcentre, the National Insurance Number Centre or the Post Office for advice on completion of the form.

Gender reassignment

The Department does not currently collect information on gender reassignment of National Insurance Number applicants. The Proof of Concept trial applies equally to all applicants whatever their gender and regardless of their gender reassignment status.

Religion or belief

The Department does not currently collect information on region or beliefs. The Proof of Concept trail applies equally to all applicants whatever their religion or beliefs and regardless of their region or beliefs.

Sexual orientation

The Department does not currently collect information on gender reassignment. The Proof of Concept trail applies equally to all applicants regardless of their sexual orientation.

Marriage and Civil Partnership

The Department does not currently collect information on Marriage or Civil Partnership of National Insurance Number applicants. The Proof of Concept trial will in future apply equally irrespective of whether a person is married or in a civil partnership.

Pregnancy and maternity

The Post Office Project Team does not expect the trial to have any impact on the basis of these factors. The Department's and Post Office staff will not discriminate on these grounds and the services offered will in no way be prejudiced.

Monitoring and evaluation

The Department for Work and Pensions is committed to monitoring the impact of its policies and an evaluation of this Proof of Concept trail will be undertaken before any further decisions are made on working with the Post Office. We will use evidence from a number of sources on the experiences and outcomes of staff and applicants. Complaints will be dealt with as per the Post Office National Insurance Number Proof of Concept Complaint Handling Protocol ([Appendix 2](#))

This equality impact assessment will be revised should the Department choose to undertake a larger scale pilot or implement any findings from the PoC evaluation.

Next steps

A senior steering group has been established to oversee the Post Office Proof of Concepts and consider the findings of each initiative.

Conclusion

In conclusion the National Insurance Number Proof of Concept trial is expected to have a positive impact on National Insurance Number applicants providing a service that is easy to use and access at more a convenient time and location than is currently offered by Jobcentre Plus. We do not expect staff to be impacted by this trial.

Jobcentre Plus staff are experienced in handling change and the project will ensure that Jobcentre Plus and Post Office staff are properly prepared and equipped to deal with applications during this trial.

In view of the information available there is no evidence that applicants will be disproportionately affected by this, or that the trial would discriminate unlawfully (whether directly or indirectly) on the grounds of age, disability, gender reassignment, race, religion or belief and sexual orientation.

Contact details

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Appendix 1

National Insurance Number registrations to adult overseas nationals entering the United Kingdom, by Gender and Age, 2009/10

	<i>Thousands</i>			
	All	Males	Females	
All		572.75	315.63	257.11
<18		8.19	4.71	3.48
18-24		228.66	125.69	102.96
25-34		227.10	126.16	100.94
35-44		67.67	37.70	29.97
45-54		29.45	15.80	13.65
55-59		6.18	3.14	3.04
60+		5.50	2.43	3.07
<hr/>				
%				
%	All	Males	Females	
All			55.1%	44.9%
<18		1.4%	0.8%	0.6%
18-24		39.9%	21.9%	18.0%
25-34		39.7%	22.0%	17.6%
35-44		11.8%	6.6%	5.2%
45-54		5.1%	2.8%	2.4%
55-59		1.1%	0.5%	0.5%
60+		1.0%	0.4%	0.5%

Definitions and conventions: "-" Nil or Negligible; Figures are rounded to the nearest ten and displayed in thousands. Some additional disclosure control has been applied. Totals may not sum due to rounding method used.

NOTE: Registration date is derived from the date at which a National Insurance Number is maintained on the National Insurance Recording and Pay as you Earn System (NPS).

Source: 100% extract from National Insurance Recording and Pay as you Earn System (NPS).

Time Series - Year Of Registration Date Years are shown as financial year (1April - 31 March).

Appendix 2

Post Office National Insurance Number Proof of Concept - Complaint Handling Protocol

To enable full evaluation of the Proof of Concept we need to be aware of all complaints received, their subject and their outcome. Within this principle:

- Post Office deal with complaints re their Customer Service;
- Jobcentre Plus (Contact Centre, Jobcentre Delivery and Benefit Delivery) deals with complaints re their Customer Service; and
- Jobcentre Plus project team and Department for Work and Pensions deals with complaints re the principle of the Proof of Concept.

Initial contact point	Complaint subject	Action
Post Office	Post Office Customer Service	<ul style="list-style-type: none"> – Post Office deal with the complaint through their existing Complaints Process. – Post Office to advise Jobcentre Plus Project of: <ul style="list-style-type: none"> ○ receipt of complain and subject; and ○ outcome
	Jobcentre Plus Customer Service (from Contact Centre or National Insurance Number Centre)	<ul style="list-style-type: none"> – Post Office will advise applicants to contact Jobcentre Plus on the number provided on the Horizon receipt. – The National Insurance Number Centre team: <ul style="list-style-type: none"> • discuss the complaint with the applicant; • advise them to write to the National Insurance Number Centre team if they wish to pursue their complaint; • log the complaint and issue (whether resolved at the telephone call or not); • arrange for written complaints to be dealt with by the appropriate team (Contact Centre, Jobcentre Delivery and Benefit Delivery) and ask for the outcome to be reported back to Number Centre • National Insurance Number Centre follow “as is” process for complaint reporting • report outcome to the project team
	Principle of the Proof of Concept process	<ul style="list-style-type: none"> – Post Office will advise the applicant to contact Jobcentre Plus on the number provided on the Horizon receipt. – National Insurance Number Centre team ask the applicant to put their complaint in writing to them, log the call and refer any subsequent written

		<p>complaint to project team.</p> <ul style="list-style-type: none"> – Project team deals with the complaint involving Department for Work and Pensions as necessary. – Project team notify outcome to the Customer Experience Team Operational Planning Performance and Change.
Contact Centre	Contact Centre Customer Service	<ul style="list-style-type: none"> – Contact Centre arrange for the: <ul style="list-style-type: none"> • complaint to be dealt with through normal channels and advise the project team of it's receipt and subject, • follow "as is" process for complaint reporting and • notify the outcome to the project team.
	Principle of the Proof of Concept process	<ul style="list-style-type: none"> – Contact Centre will advise the applicant to contact the National Insurance Number Centre team in Glasgow. – National Insurance Number Centre team ask the applicant to put their complaint in writing to them, log the call and refer any subsequent written complaint to project team. – Project team deals with the complaint involving Department for Work and Pensions as necessary. – Project team notify outcome to the Customer Experience Team Operational Planning Performance and Change.
Jobcentre Delivery	Jobcentre Delivery Customer Service	<ul style="list-style-type: none"> – Jobcentre Delivery arrange for the: <ul style="list-style-type: none"> • complaint to be dealt with through normal channels and advise the project team of it's receipt and subject; • follow "as is" process for complaint reporting and • notify the outcome to the project team.
	Principle of the Proof of Concept process	<ul style="list-style-type: none"> – Jobcentre Delivery will advise the applicant to contact the National Insurance Number Centre team in Glasgow. – National Insurance Number Centre team ask the applicant to put their complaint in writing to them, log the call and refer any subsequent written complaint to project team. – Project team deals with the complaint involving Department for Work and Pensions as necessary.

		<ul style="list-style-type: none"> – Project team notify outcome to the Customer Experience Team Operational Planning, Performance and Change (OPPC)
National Insurance Number Centre	Number Centre Customer Service	<ul style="list-style-type: none"> – National Insurance Number Centre arrange for the: <ul style="list-style-type: none"> • complaint to be dealt with through normal channels and advise the project team of it's receipt and subject; • follow "as is" process for complaint reporting and • notify the outcome to the project team.
	Principle of the Proof of Concept process	<ul style="list-style-type: none"> – National Insurance Number Centre team ask the applicant to put their complaint in writing to them, log the call and refer any subsequent written complaint to project team. – Project team deals with the complaint involving Department for Work and Pensions as necessary. – Project team notify outcome to the Customer Experience Team Operational Planning Performance and Change