

ANALYSIS OF HMRC's Proposed Closure Of Custom House, Newry

Issued by Workforce Management Programme
3 June 2014

TABLE OF CONTENTS

1 BACKGROUND3

2 OFFICE PROFILE3

3 STAFF AND BUSINESS RELOCATION..... 3

4 EQUALITY & DIVERSITY4

5 STAFF EQUALITY GROUP ANALYSIS5

To receive this document in an alternative version please contact the Visually Impaired Media Unit on 01274 539 646 or e-mail VISUALLY IMPAIRED MEDIA UNIT, SHIPLEY (Corp Comms Marketing).

1 BACKGROUND

HMRC is transforming the service it gives to its customers as well as its approach to compliance, delivering a joined-up, more highly-personalised service that makes things easier and more straightforward for them. Increasingly, although not exclusively, this will be delivered online, as HMRC uses the £200 million received in the 2013 Spending Review to build on and expand its digital services.

Since the 2010 Spending Review, it has been clear that HMRC will continue the long-term trend to become a smaller, more highly-skilled organisation, based in fewer locations. On 5 June 2014, we launched a consultation on a proposed closure date in 12 of 14 locations that our lines of business said in November 2013 do not fit their medium to long-term plans. The consultation is with our own staff, our trade union colleagues and the Members of Parliament, Members of the Devolved Administrations and local authorities concerned.

The Equality Analysis in this document will contribute to a decision by HMRC's Executive Committee in September on whether to proceed with the proposed closure date for Custom House, Newry.

The proposed closure of Custom House, Newry is being delivered as a project within the Estate Strategy Implementation Programme which is a key element of the HMRC Change Programme.

This building analysis document considers the overall impacts arising for the staff if the building closes and continues HMRC's commitment to show due regard to its Equality Duty as a public sector body arising from the Equality Act 2010 and Section 75 of the Northern Ireland Act 1998.

2 OFFICE PROFILE

HMRC occupies the whole site at Custom House under the contract with Mapeley. There are 100 bays provided for on site parking of which four are dedicated for special arrangement users (disabled, maternity etc).

The office accommodates a total of 110 staff (this is the February 2014 staffing figure excluding staff who took a voluntary exit at 30 April 2014).

There is no Enquiry Centre at Custom House.

3 STAFF AND BUSINESS RELOCATION

Individual 1-2-1 discussions will be offered to staff by managers regarding the proposed closure of Custom House to discuss redeployment options, any issues/concerns which they may have and any impacts which may arise.

Where relocation is an available option for staff, no staff will be expected to travel beyond reasonable daily travel (RDT) but some may choose to do so.

Those staff who are willing to travel beyond RDT to relocate are likely to be eligible for daily travel assistance (DTA) for up to five years. For other staff who are willing to relocate and who will be travelling within RDT, DTA will be paid for up to three years if they are eligible for DTA (e.g. they are in the redeployment pool and their new permanent job means that they move to a new location and incur additional travelling costs).

Staff currently in receipt of reasonable adjustments will require these to be replicated should Custom House close and they are able to relocate to another HMRC office.

4 EQUALITY GROUP REVIEW

Workforce Management Programme (WMP) has undertaken staff equality group analysis as a result of the announcement of the proposed closure of Custom House.

No significant risks with regard to equality issues have been identified. A summary of the equality group analysis findings are provided at Section 5.

5 EQUALITY GROUP ANALYSIS

Identifying the aims of the policy/activity	
1. Title of policy/activity	The proposed closure of Custom House, Newry.
2. Planned implementation date	If a decision is made to close Custom House, the proposed closure date is December 2015.
3. Who has responsibility for managing the policy/activity?	WMP and the Estate Strategy Implementation Programme.
4. Full description of the aims of the policy/activity	To deliver efficiency savings as part of the SR10 and SR 13 funding settlements by the proposed vacation of Custom House.
5. How many people or locations are likely to be affected?	The 110 ¹ HMRC staff currently working at Custom House will be directly affected. The staff work in the following businesses – Tax Professionalism and Assurance, Estates and Support Services, E&C Central Services, Local Compliance and PT Operations. There is no Enquiry Centre at the building.
6. Who (in HMRC) implements this activity?	WMP, in conjunction with the Estates Strategy Implementation Programme, will implement the policy to vacate the building should a decision be made to do so. A project team led by ESS would oversee the closure of Custom House.
7. Does this policy/activity interact with any other policies, activities or business areas?	There is no direct interaction with other proposals. The vacation of the building would provide running cost savings in line with the Department's Spending Review Settlements and in conjunction with Directorates business plans.

¹Source: ERP data February 2014 (excluding staff who took a voluntary exit on 30 April 2014)

Gathering Information	
1. Who are the internal and external stakeholders of this proposed action?	<p>Internal – staff, managers, business unit planners, trade unions, WMP, Human Resources, IMS and ESS.</p> <p>External – Exchequer Secretary for the Treasury, Mapeley and Aspire.</p>
2. How will you work with the stakeholders in implementing this function?	<p>We will work with the business units affected to establish needs prior to any staff moves taking place. Discussions will also take place between managers and their staff to identify any areas of concern.</p> <p>If a decision is made to close Custom House, Local Trade Unions representatives will be engaged and also be able to give feedback during the implementation of the project. We will work also with all other stakeholders to ensure that arrangements are in place for the closure of Custom House.</p>
3. What data have you collected and analysed?	<p>All equality group data for staff has been obtained and analysed.</p> <p>If a decision is taken to close Custom House:</p> <ul style="list-style-type: none"> • ESS will have calculated the estate savings involved and relocation options for staff will have been considered • All the staff affected by a closure will have discussed with their managers any concerns/issues that they have and any relocation options available. Where relocation is an available option, no staff will be expected to travel beyond RDT but some may choose to do so.
4. If little or no statistical data exists, then what other methods have you used to gather information on potential or actual equality outcomes?	<p>Discussions between staff and their managers will take place to establish actual impacts on any equality groups. An overarching People Impact Assessment has already been carried out for the 14 offices where there is a proposed closure date, including this office. A local People Impact Assessment will be carried out for this office during June and July 2014. Staff affected by the proposed decision will be invited to contribute to this local People Impact Assessment. This will be an opportunity to raise any personal impacts as well as any impacts on the protected groups set out below.</p>

Assessing the impact																		
Note: All diversity data quoted in this equality group analysis is provided by background HR systems as at 28 February 2014. As staff completion is not mandatory, the information is incomplete for ethnicity, disability and sexual orientation. Where percentage figures equate to staff numbers less than 5, this has been indicated by a hyphen (-) to protect the anonymity of staff.																		
Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality															
Racial Group	None Identified	<table><tr><th>Ethnicity</th><th>%</th></tr><tr><td>White*</td><td>82.73</td></tr><tr><td>BAME*</td><td>0</td></tr><tr><td>Chosen Not To Declare</td><td>0</td></tr><tr><td>Declaration Rate</td><td>82.73</td></tr><tr><td>Not Known</td><td>17.27</td></tr><tr><td colspan="2">Known BAME staff based on those who made a *positive declaration 0%</td></tr></table>	Ethnicity	%	White*	82.73	BAME*	0	Chosen Not To Declare	0	Declaration Rate	82.73	Not Known	17.27	Known BAME staff based on those who made a *positive declaration 0%		<p>The ethnicity declarations for staff in Custom House are as aside.</p> <p>HMRC’s national declaration rate for ethnicity is 79.24%, of which 8.33% of staff have declared that they that they are BAME.</p>	None Identified
		Ethnicity	%															
		White*	82.73															
		BAME*	0															
		Chosen Not To Declare	0															
		Declaration Rate	82.73															
		Not Known	17.27															
		Known BAME staff based on those who made a *positive declaration 0%																
<p>Managers will be holding 1-2-1 meetings with their staff to consider each person’s individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their race and what mitigation if any, that can be put in place.</p> <p>From analysis of the data held on HMRCs on line system, no potential adverse impacts have been identified that would disproportionately affect staff due to their racial group.</p>																		

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality														
Disabled/Not Disabled	None Identified	<table><tr><th>Disability Status</th><th>%</th></tr><tr><td>Disabled*</td><td>12.73</td></tr><tr><td>Not Disabled*</td><td>45.45</td></tr><tr><td>Chosen Not To Declare</td><td>0</td></tr><tr><td>Declaration Rate</td><td>58.18</td></tr><tr><td>Not Known</td><td>41.82</td></tr><tr><td colspan="2">Known disabled staff based on those who made a *positive declaration 21.88%</td></tr></table> <p>The disability declarations for staff in Custom House are as aside.</p> <p>HMRC’s national declaration rate for disability is 63.04% of which 16.46% of staff have declared that they are disabled.</p> <p>The potential impact on disabled staff is dependent on personal circumstances.</p> <p>Where relocation is an available option for staff, the following impacts have been identified from previous relocations for staff from this equality group:</p> <ul style="list-style-type: none">those who require specialist IT equipment or reasonable adjustment adaptations may need to discuss their requirements/needs with their manager to ensure that they are available at their new locationstaff relocating to a new building may experience changes to their home to work journeys. If travelling by public transport there may be an adverse impact if the public transport services available to the new location are not adequatestaff travelling to work by car may be adversely affected if their current location provides disabled parking facilities and these are not available at the new locationstaff requiring training may be adversely impacted if training courses require overnight stays or long distance travel.	Disability Status	%	Disabled*	12.73	Not Disabled*	45.45	Chosen Not To Declare	0	Declaration Rate	58.18	Not Known	41.82	Known disabled staff based on those who made a *positive declaration 21.88%		HMRC has a disability action plan in place with the aim of improving HMRC’s services to disabled staff.
Disability Status	%																
Disabled*	12.73																
Not Disabled*	45.45																
Chosen Not To Declare	0																
Declaration Rate	58.18																
Not Known	41.82																
Known disabled staff based on those who made a *positive declaration 21.88%																	

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality
Disabled/Not Disabled (continued)	None Identified	<p>Managers will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their disability and what mitigation if any, that can be put in place.</p> <p>If necessary, the support and guidance of HR diversity specialists will be sought.</p> <p>From analysis of the data held on HMRCs on line system, no potential adverse impacts have been identified that would disproportionately affect staff from this equality group.</p> <p>Where relocation to another office will be possible, ESS will contact each business unit involved to establish what reasonable adjustments their staff require to successfully relocate, including what, if any, adaptations are required to the relocation office to accommodate disabled staff needs.</p> <p>Other Potential Action:</p> <ul style="list-style-type: none"> visits to a relocation office ahead of the permanent relocation date may be necessary to establish personal needs building evacuation plans in a relocation office may need to be reviewed by management to consider any changes necessary as a result of any additional disabled staff relocating to the building disabled staff should be encouraged to complete reasonable adjustment passports which should be reviewed by staff and their managers upon relocation managers may need to engage with "Access to Work" to identify reasonable solutions to assist with journeys. 	

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action		Opportunities to Promote Equality						
Gender	None Identified	<table><tr><th>Gender</th><th>%</th></tr><tr><td>Male</td><td>20.91</td></tr><tr><td>Female</td><td>79.09</td></tr></table>	Gender	%	Male	20.91	Female	79.09	<p>The gender ratio for staff in Custom House is as aside. HMRC's national gender ratio is 41.52% male to 58.48% female.</p> <p>53.64% of the staff at Custom House work part time, of which 91.53% are female.</p> <p>In HMRC overall, 35.47% work part time, of which 80.23% are female.</p> <p>As the percentage of female staff in Custom House is much higher than the overall comparable HMRC percentage, it is recognised that more female staff will be impacted as a result of any closure.</p> <p>Managers will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their gender and what mitigation if any, that can be put in place.</p> <p>Potential impacts arising for those staff (full and part time) with care responsibilities are noted in the carers section below.</p>	None Identified
		Gender	%							
		Male	20.91							
		Female	79.09							

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality
Gender Reassignment	None Identified	<p>HMRC does not centrally collect staff gender reassignment data. Managers, all of whom should have completed the transgender awareness training, will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their gender reassignment and what mitigation if any, that can be put in place.</p> <p>Any impacts or issues etc. will be discussed sensitively and if necessary the support and guidance of HR diversity specialists and the transgender network will be sought.</p> <p>No potential adverse impacts have currently been identified that would disproportionately affect staff from this equality group.</p> <p>Where relocation is an available option for staff, the following impacts have been identified from previous relocations for staff from this equality group:</p> <ul style="list-style-type: none"> • staff may already be patients at a gender identity clinic. A necessary change in working patterns at a new location may make visiting such a clinic more difficult or disrupt existing treatment schedules • the loss of local networks, community groups etc as a result of staff relocating • staff may not be comfortable with a change of role at a new location, although no decision would be made without first establishing the individual's wishes • during meetings with their managers regarding proposed relocations staff may have to reveal their trans status in order to mention their specific issues and concerns. Managers will need to ensure that this information is not then passed to others unlawfully • some individuals may wish their colleagues to be aware that they are transgender and may need support with this. Others may wish to keep their transgender status private and steps must be taken to facilitate this. In both cases, the wishes of the individual are paramount. 	None Identified

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality														
Sexual Orientation	None Identified	<table><tr><th>Sexual Orientation</th><th>%</th></tr><tr><td>Heterosexual/Straight*</td><td>-</td></tr><tr><td>Lesbian/Gay/Bisexual/Other*</td><td>-</td></tr><tr><td>Chosen Not To Declare</td><td>0.91</td></tr><tr><td>Declaration Rate</td><td>32.73</td></tr><tr><td>Not Known</td><td>67.27</td></tr><tr><td colspan="2">Known LGB/Other staff based on those who made a *positive declaration -</td></tr></table> <p>The sexual orientation declarations for staff in Custom House are as aside.</p> <p>HMRC's national declaration rate for sexual orientation is 52.51%, of which, 4.39% of staff have declared that they are LGB/Other.</p> <p>The potential impact on staff of different sexual orientation is dependent on personal circumstances.</p> <p>Managers will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their sexual orientation and what mitigation if any, that can be put in place.</p> <p>If issues etc. do arise they will be discussed sensitively by managers to overcome them. If necessary the support and guidance of HR diversity specialists will be sought.</p> <p>No potential adverse impacts have currently been identified that would disproportionately affect staff from this equality group.</p>	Sexual Orientation	%	Heterosexual/Straight*	-	Lesbian/Gay/Bisexual/Other*	-	Chosen Not To Declare	0.91	Declaration Rate	32.73	Not Known	67.27	Known LGB/Other staff based on those who made a *positive declaration -		None Identified
Sexual Orientation	%																
Heterosexual/Straight*	-																
Lesbian/Gay/Bisexual/Other*	-																
Chosen Not To Declare	0.91																
Declaration Rate	32.73																
Not Known	67.27																
Known LGB/Other staff based on those who made a *positive declaration -																	

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality												
Age	None Identified	<table><tr><th>Age Group</th><th>%</th></tr><tr><td>16 - 21</td><td>0</td></tr><tr><td>22 - 32</td><td>5.46</td></tr><tr><td>33 - 43</td><td>37.27</td></tr><tr><td>44 - 54</td><td>48.18</td></tr><tr><td>55 +</td><td>9.09</td></tr></table> <p>The age profile of staff in Custom House is as above.</p> <p>Managers will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their age and what mitigation if any, that can be put in place.</p> <p>No potential adverse impacts have currently been identified that would disproportionately affect staff of a different age although it is recognised that staff in older age groups might generally find it more difficult to find alternate employment.</p>	Age Group	%	16 - 21	0	22 - 32	5.46	33 - 43	37.27	44 - 54	48.18	55 +	9.09	None Identified
Age Group	%														
16 - 21	0														
22 - 32	5.46														
33 - 43	37.27														
44 - 54	48.18														
55 +	9.09														

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action		Opportunities to Promote Equality										
Religion or Belief	None Identified	<table><tr><th>Community Background</th><th>%</th></tr><tr><td>Catholic</td><td>70.91</td></tr><tr><td>Protestant</td><td>20.91</td></tr><tr><td>Declaration Rate</td><td>91.82</td></tr><tr><td>Not Known</td><td>8.18</td></tr></table>	Community Background	%	Catholic	70.91	Protestant	20.91	Declaration Rate	91.82	Not Known	8.18	<p>HMRC does not collect data on religion or beliefs. However, we do collect data on community background for Northern Ireland employees.</p> <p>The Community Background of staff in Custom House is as aside.</p> <p>HMRC’s declaration rate for community background in Northern Ireland is 90.78% of which 50.11% have declared they are Catholic and 40.67% Protestant.</p>	HMRC will continue to meet its obligations under the Fair Employment and Treatment Order including monitoring the community background of its staff and taking affirmative action measures, where necessary, to maintain fair participation in its workforce by both communities.
		Community Background	%											
		Catholic	70.91											
		Protestant	20.91											
		Declaration Rate	91.82											
		Not Known	8.18											
		<p>As the percentage of known Catholic staff in Custom House (which is in line somewhat with the local District percentage) is much higher than the overall comparable HMRC Northern Ireland percentage, it is recognised that more staff from a Catholic community background will be impacted as a result of any closure.</p>												
<p>Managers will be holding 1-2-1 meetings with their staff to consider each person’s individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their community background and what mitigation if any, that can be put in place.</p>														
<p>Where relocation is an available option for staff, the following impacts have been identified from previous relocations for staff from this equality group:</p> <ul style="list-style-type: none">• changes to the network/support structure and facilities available at a new location• the availability of an “All Faith Room” at a new location.														
<p>If required “All Faith Rooms” should be provided on request if there are not dedicated rooms available at a relocation office.</p>														

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality
Carers	None Identified	<p>HMRC gathers some information regarding staff with dependants via staff surveys.</p> <p>Managers will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their caring responsibilities and what mitigation if any, that can be put in place.</p> <p>No potential adverse impacts have currently been identified that would disproportionately affect staff with caring responsibilities.</p> <p>Where relocation is an available option for staff, the following impacts have been identified from previous relocations for staff from this equality group:</p> <ul style="list-style-type: none"> • concerns for staff with care responsibilities about increased travelling time and the availability of suitable public transport links to a new location • additional care costs may be incurred • changes may be required to working patterns to balance work/life commitments • daily travel assistance paid to assist with additional travelling costs is taxable and impacts on the payment of tax credits • whilst in general staff will not change jobs on relocation, working patterns or hours may need to be changed to suit personal circumstances or new business needs. <p>In addition, full or part time staff with caring responsibilities who require training may be adversely impacted if training courses require overnight stays or long distance travel.</p>	HMRC provides childcare vouchers to assist staff with childcare costs.

Equality Group	Impacts on Customers	Impacts on Staff and Mitigation Action	Opportunities to Promote Equality
Pregnancy and Maternity	None Identified	None Identified	None Identified
Marriage and Civil Partnership	None Identified	None Identified	None Identified
Political Opinion	None Identified	<p>HMRC does not collect data on political opinion. No impacts in addition to those referred to in the Religion or Belief section above have been identified.</p> <p>Managers will be holding 1-2-1 meetings with their staff to consider each person's individual circumstances. At the meetings managers will also be establishing whether any adverse impacts or issues are likely to arise for their staff due to their political opinion and what mitigation if any, that can be put in place.</p>	None Identified
People who use different Languages (Including Welsh Language and British Sign Language)	None Identified	None Identified	None Identified

HMRC also has a general equality duty to advance equality of opportunity between staff who share a protected characteristic and people who do not share it.

The proposed closure of Custom House is unlikely to offer HMRC a chance to advance equality of opportunity between staff who share a protected characteristic and people who do not.

Decision Making	
What changes did you make as a result of carrying out this equality analysis?	There has been no need to make any changes.
Any other comments on this proposed activity or any key learning for other similar policies/activities?	None
Monitoring Arrangements	
How do you plan to monitor the impact on equality groups if staff relocate to another HMRC office?	Managers of staff in a new office will continually monitor any mitigating action taken to ensure that it is effective and make any changes to the mitigation which might be introduced as necessary. Objections/grievances and appeals will be monitored by local management to establish if a relocation disproportionately impacts on any of the groups assessed. Any further mitigation or action necessary will be introduced/taken based on actual findings.
If necessary, who will be responsible for carrying out the monitoring and analysing the results?	Local management and WMP.

Completed by: Chris Jones

Job Title/Role: Equality Analysis Lead/Technician

Business Unit and Office: Workforce Management Programme

By or on behalf of:

Liz Welsh

Deputy Director Workforce Management

Date:

3 June 2014