

# Annexes

Annex 1 should be used to set out the Post Implementation Review Plan as detailed below. Further annexes may be added to provide further information about non-monetary costs and benefits from Specific Impact Tests, if relevant to an overall understanding of policy options.

## Annex 1: Post Implementation Review (PIR) Plan

A PIR should be undertaken, usually three to five years after implementation of the policy, but exceptionally a longer period may be more appropriate. A PIR should examine the extent to which the implemented regulations have achieved their objectives, assess their actual costs and benefits and identify whether they are having any unintended consequences. Please set out the PIR Plan as detailed below. If there is no plan to do a PIR please provide reasons below.

**Basis of the review:** [The basis of the review could be statutory (forming part of the legislation), it could be to review existing policy or there could be a political commitment to review];

**Review objective:** [Is it intended as a proportionate check that regulation is operating as expected to tackle the problem of concern?; or as a wider exploration of the policy approach taken?; or as a link from policy objective to outcome?]

**Review approach and rationale:** [e.g. describe here the review approach (in-depth evaluation, scope review of monitoring data, scan of stakeholder views, etc.) and the rationale that made choosing such an approach]

**Baseline:** [The current (baseline) position against which the change introduced by the legislation can be measured]

**Success criteria:** [Criteria showing achievement of the policy objectives as set out in the final impact assessment; criteria for modifying or replacing the policy if it does not achieve its objectives]

**Monitoring information arrangements:** [Provide further details of the planned/existing arrangements in place that will allow a systematic collection of monitoring information for future policy review]

**Reasons for not planning a PIR:** [If there is no plan to do a PIR please provide reasons here]

IPS operates on a business footing and delivery of its services and the level and quality of customer service are subject to ongoing assessment and analysis. The impact of the policy is monitored on a regular basis through 'vital signs' analysis and by the annual reporting and monitoring processes.

# Annex 2. Specific Impact Tests

**Statutory Equality Duties**  
Equality Impact Assessment Copy Attached

**Economic Impacts**  
Small Firms Impact Test N/A

**Environmental Impacts**  
Greenhouse Gas Assessment N/A

Wider Environmental Issues N/A

**Social Impacts**  
Health and Well-being N/A

Human Rights N/A

Justice N/A

Rural Proofing

As part of the proposed closure programme, IPS considered the expectations of the population across the UK to have access to high quality passport services. The Newport passport office currently serves people across South Wales and South West England, including many who live in rural areas.

The IPS closure plan relates to the passport application processing centre at Newport. IPS intends to retain a Customer Service Centre in Newport to service South Wales and the South West. The centre will employ up to 45 people to provide a counter service and the ability to deal with applicants in the Welsh language. The Customer Service Centre will cater for the 47, 000 people a year who use the current Newport regional office and will provide capacity for 7, 000 interviews each year.

IPS is moving to a more flexible way of working, relying less on fixed, under used offices and providing services to meet areas of local demand. The aim is to make better use of government and local authority offices, as well as flexible facilities which can operate and deliver services from anywhere in the country. IPS will continue to the run the Video Interview Service for customers in remote locations.

IPS is maintaining a passport office in Newport and surrounding communities will not be subject to any reduction in service. Additionally, we believe that the additional measures outlined above are consistent with the rural solutions set out in the 'Commission for Rural Communities' toolkit (<http://ruralcommunities.gov.uk/files/rural%20proofing%20toolkit.pdf>).

**Sustainability** N/A

# Equality Impact Assessment Report: Closure of application processing in Newport

Version 1.0  
Author IPS  
Date 09/03/11



Step 1 : Define the aims of the activity

V0.07

<b>Title of activity or change</b>	Closure of the Newport Regional Office by May 2012 and establishment of a Customer Service Centre in Newport to provide priority services and authentication interviews.
<b>Strategic Outcome</b>	To enable IPS to become more efficient and financially independent, providing services without the need for support from the taxpayer.
<b>Name of Team</b>	IPS Operations Development Programme, primarily delivered by the Newport Office Closure Project
<b>Directorate</b>	Operations and Organisational Transformation
<b>What is the purpose of the proposed activity (or changes to be made to the activity)?</b>	<ul style="list-style-type: none"> <li>▪ To reduce the size of IPS Estate, thereby reducing fixed asset costs and overcapacity in terms of space</li> <li>▪ To eliminate staff overcapacity via a headcount reduction, thereby reducing overall operating costs</li> </ul>
<p>a) <b>Who is affected by the activity/ change?</b></p> <p>b) <b>Who is intended to benefit from the proposed activity</b></p> <p>c) <b>How will they benefit?</b></p>	<p>a) All staff and customers within the Newport catchment area, IPS business partners (IT suppliers, business process outsourcing partners, Royal Mail, DX Secure, TP, landlords, facilities management contractor) and office suppliers (full details will be available in the Impacts &amp; Mitigation document).</p> <p>b) Home Office, IPS, Tax Payers and Treasury.</p> <p>c) Home Office will meet targets set by Coalition Government to reduce spending. IPS will require less financial support from Treasury leading to greater autonomy for business decisions. Treasury can then reallocate funds to other Government Departments or use the savings to help reduce the budget deficit.</p>
<p>a) <b>How have you, or will you, put the activity / change into practice?</b></p> <p>b) <b>Who is or will be responsible for delivering it?</b></p>	<ul style="list-style-type: none"> <li>▪ Project Board and Team created.</li> <li>▪ Outline project plan created by Newport Office Closure Project.</li> <li>▪ List of stakeholders identified and workshops scheduled to gain input.</li> <li>▪ Internal and external communications plans drafted, proposals communicated publicly</li> <li>▪ Representation made to Home Office Minister, Treasury Parliament and the Welsh Assembly.</li> <li>▪ Change will follow PRINCE2 methodology and change disciplines established within IPS.</li> </ul>
<b>How does the activity / change fit into our wider or related policy initiatives?</b>	<ul style="list-style-type: none"> <li>• IPS seeks to be self sufficient on funding by April 2011;</li> <li>▪ The services provided by the public counter and Interview Office will remain in Newport in a new, integrated Customer Service Centre with a new business model.</li> <li>▪ Co-locating existing ION and Regional Office counter functions provides further opportunity for closer working and cost savings in terms of Estates and Staffing.</li> <li>▪ The closure forms part of a wider IPS Restructure Programme</li> </ul>
<p>a) <b>Do you have a set budget for this work?</b></p> <p>b) <b>Who is responsible for that budget?</b></p>	Budget exists within the Organisation Transformation Directorate and is currently being allocated to the IPS Operations Development Programme. The Operations Development Programme Director has responsibility for the budget.

Step 2: What do you already know about the diverse needs and/or experiences of your target audience?

## Background information

Newport has a population of 140 000, but the number of economically active working age people who live within 30mins of the city totals 479 000. ONS data placed the unemployment rate in Wales at 8.2% between June and August 2010. In September 2010, the Regional Economic & Labour Market profile for South East Wales stated that the area has the highest unemployment rate across Wales. As a region, Wales is reliant on the public sector for employment – according to Public Sector Employment data (quarter 2, 2010), there were 343 000 people employed in the Public Sector in Wales. 16.7% of the population can speak Welsh to some degree.

There are currently 313 full time equivalent (FTE) staff in Newport. Staff numbers have fluctuated recently as staff availed of the Voluntary Early Release scheme. Of these, 24 staff members work for HQ directorates. The office has capacity to process a maximum of 18,000 applications per week. The postal applications catchment area encompasses Wales, Somerset, Avon, Herefordshire, Dorset, Cornwall, Isles of Scilly, Devon, and NW London. The office handles all applications submitted via the online channel (EPA route) and Forces applications bearing BFPO addresses. Newport also houses the centralised Customer Services Team and handles complaints referred from all other IPS offices. However, the equality impact of transferring online, forces applications and complaints handling to another office is negligible for customers, so this assessment will be based specifically upon the impacts on staff and customers based in Wales.

**Please tick Yes or No for each diversity strand**

<b>Do you have information on staff:</b>	Yes	✓	No	
<b>Age</b>	Yes	✓	No	
<b>Disability</b>	Yes	✓	No	
<b>Gender</b>	Yes	✓	No	
<b>Gender Identity (Transsexual/Transgender)</b>	Yes		No	✓
<b>Lesbian, Gay, Bisexual</b>	Yes	✓	No	
<b>Race</b>	Yes	✓	No	
<b>Religion and Belief</b>	Yes	✓	No	
<b>Marriage &amp; Civil Partnership</b>	Yes	✓	No	
<b>Pregnancy &amp; Maternity</b>	Yes	✓	No	
<b>Caring responsibilities</b>	Yes		No	✓
<b>Working patterns</b>	Yes	✓	No	
<b>Grade</b>	Yes	✓	No	

To enable comparisons to be made, the data is shown for IPS as a whole and for each regional office that was considered for closure. Reports were run using the HR Adelphi system on 21/2/11, and the results include all staff based in the Regional Office (including HQ staff) with the exception of Belfast. The Belfast Interview Office co-located with the Regional Office in December 2010, but to enable appropriate comparison and avoid double recording of the data, the diversity results for Belfast ION staff have been removed from the data published in this document. A separate EIA has been produced for the proposed ION Restructure and data for Belfast ION has been incorporated within that document.

<b>Age</b>	<b>Evidence:</b> A summary of age data per APC is provided in the following table:						
		<b>IPS</b>	<b>Belfast</b>	<b>Durham</b>	<b>Liverpool</b>	<b>Newport</b>	<b>Peterborough</b>
	<b>16-19</b>	0.17%	0.00%	0.83%	0.22%	0.00%	0.00%
	<b>20-24</b>	3.03%	4.02%	4.16%	5.27%	0.93%	3.61%
	<b>25-29</b>	9.38%	11.49%	8.60%	10.55%	8.02%	10.64%
	<b>30-34</b>	13.48%	18.39%	16.92%	14.29%	8.95%	12.05%
	<b>35-39</b>	13.48%	20.11%	12.48%	14.07%	15.12%	13.25%
	<b>40-44</b>	15.00%	14.94%	13.59%	12.75%	18.21%	16.06%
	<b>45-49</b>	14.44%	12.64%	12.62%	15.38%	14.51%	11.85%
	<b>50-54</b>	12.68%	7.47%	11.93%	12.53%	13.27%	11.04%
<b>55-59</b>	10.47%	6.90%	11.79%	9.89%	9.88%	11.24%	
<b>60-64</b>	7.00%	2.87%	6.52%	3.52%	8.64%	8.84%	
<b>65+</b>	1.26%	1.15%	0.55%	1.54%	2.47%	1.41%	
	The age band profile for Newport is comparable with that found in other Regions.						
<b>Disability</b>	<b>Evidence:</b> A summary of disability data per IPS office is provided in the following table:						
		<b>IPS</b>	<b>Belfast</b>	<b>Durham</b>	<b>Liverpool</b>	<b>Newport</b>	<b>Peterborough</b>
	<b>Disabled</b>	10%	7%	13%	10%	11%	11%
	<b>Non Disabled</b>	80%	87%	79%	78%	84%	76%
	<b>Prefer not to say</b>	5%	4%	4%	7%	4%	6%
	<b>Declaration rate</b>	95%	98%	95%	95%	98%	94%
<b>Not surveyed</b>	5%	2%	5%	5%	2%	6%	
	Newport results are again comparable with other regions and the IPS average.						
<b>Gender</b>	<b>Evidence:</b> A summary of gender data per IPS office is provided in the following table:						

	<b>Female</b>	<b>Male</b>
<b>Belfast</b>	64%	36%
<b>Durham</b>	67%	33%
<b>Liverpool</b>	66%	34%
<b>Newport</b>	73%	27%
<b>Peterborough</b>	71%	29%
<b>IPS Total</b>	64%	36%

Newport has a higher percentage of female employees than any other region, although results are broadly comparable with the Peterborough Regional Office.

<b>Gender Identity</b>	<p><b>Evidence:</b></p> <p>No data available. HR records may include this information if the gender reassignment took place during the employment period, but we are prohibited by the Gender Recognition Act from disclosing this information and it is unacceptable to interrogate records to establish whether a member of staff has been through a gender reassignment process.</p>																																										
<b>Lesbian, Gay, Bisexual</b>	<p><b>Evidence:</b></p> <p>A summary of sexual orientation data per IPS office is provided in the following table:</p> <table border="1" data-bbox="322 523 1646 742"> <thead> <tr> <th></th> <th><b>IPS</b></th> <th><b>Belfast</b></th> <th><b>Durham</b></th> <th><b>Liverpool</b></th> <th><b>Newport</b></th> <th><b>Peterborough</b></th> </tr> </thead> <tbody> <tr> <td><b>Heterosexual</b></td> <td>81%</td> <td>90%</td> <td>84%</td> <td>79%</td> <td>85%</td> <td>78%</td> </tr> <tr> <td><b>Other</b></td> <td>1%</td> <td>2%</td> <td>1%</td> <td>1%</td> <td>1%</td> <td>2%</td> </tr> <tr> <td><b>Prefer not to say</b></td> <td>12%</td> <td>7%</td> <td>10%</td> <td>14%</td> <td>12%</td> <td>14%</td> </tr> <tr> <td><b>Declaration rate</b></td> <td>94%</td> <td>98%</td> <td>95%</td> <td>95%</td> <td>98%</td> <td>94%</td> </tr> <tr> <td><b>Not surveyed</b></td> <td>6%</td> <td>2%</td> <td>5%</td> <td>5%</td> <td>2%</td> <td>6%</td> </tr> </tbody> </table> <p>Newport results are in line with the remaining regions and IPS average, however the Spectrum staff network group identified concerns with the completion rate and the apparent tendency for staff to select the “prefer not to say” option on Adelphi. The group recommend IPS considers the data on the assumption that Newport is in line with the Home Office average of approx 3% LGB staff. Throughout the UK, it is generally accepted that approx 6% of adults are LGB.</p>		<b>IPS</b>	<b>Belfast</b>	<b>Durham</b>	<b>Liverpool</b>	<b>Newport</b>	<b>Peterborough</b>	<b>Heterosexual</b>	81%	90%	84%	79%	85%	78%	<b>Other</b>	1%	2%	1%	1%	1%	2%	<b>Prefer not to say</b>	12%	7%	10%	14%	12%	14%	<b>Declaration rate</b>	94%	98%	95%	95%	98%	94%	<b>Not surveyed</b>	6%	2%	5%	5%	2%	6%
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<b>Race</b>	<p><b>Evidence:</b></p> <p>A summary of Black and Minority Ethnic (BME) data per APC is provided in the following table:</p> <table border="1" data-bbox="322 1082 1646 1300"> <thead> <tr> <th></th> <th><b>IPS</b></th> <th><b>Belfast</b></th> <th><b>Durham</b></th> <th><b>Liverpool</b></th> <th><b>Newport</b></th> <th><b>Peterborough</b></th> </tr> </thead> <tbody> <tr> <td><b>White</b></td> <td>80%</td> <td>95%</td> <td>92%</td> <td>86%</td> <td>91%</td> <td>66%</td> </tr> <tr> <td><b>Other</b></td> <td>13%</td> <td>2%</td> <td>2%</td> <td>4%</td> <td>4%</td> <td>26%</td> </tr> <tr> <td><b>Prefer not to say</b></td> <td>2%</td> <td>1%</td> <td>1%</td> <td>5%</td> <td>4%</td> <td>3%</td> </tr> <tr> <td><b>Declaration rate</b></td> <td>95%</td> <td>98%</td> <td>95%</td> <td>95%</td> <td>98%</td> <td>94%</td> </tr> <tr> <td><b>Not surveyed</b></td> <td>5%</td> <td>2%</td> <td>5%</td> <td>5%</td> <td>2%</td> <td>6%</td> </tr> </tbody> </table> <p>There is no significant difference between the results for Newport and the remaining regions.</p>		<b>IPS</b>	<b>Belfast</b>	<b>Durham</b>	<b>Liverpool</b>	<b>Newport</b>	<b>Peterborough</b>	<b>White</b>	80%	95%	92%	86%	91%	66%	<b>Other</b>	13%	2%	2%	4%	4%	26%	<b>Prefer not to say</b>	2%	1%	1%	5%	4%	3%	<b>Declaration rate</b>	95%	98%	95%	95%	98%	94%	<b>Not surveyed</b>	5%	2%	5%	5%	2%	6%
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<b>Religion and Belief</b>	<p><b>Evidence:</b> A summary of data across each APC is included in the table below:</p> <table border="1"> <thead> <tr> <th></th> <th><b>IPS</b></th> <th><b>Belfast</b></th> <th><b>Durham</b></th> <th><b>Liverpool</b></th> <th><b>Newport</b></th> <th><b>Peterborough</b></th> </tr> </thead> <tbody> <tr> <td><b>Christian</b></td> <td>59%</td> <td>82%</td> <td>65%</td> <td>74%</td> <td>59%</td> <td>48%</td> </tr> <tr> <td><b>Other</b></td> <td>26%</td> <td>10%</td> <td>23%</td> <td>13%</td> <td>30%</td> <td>38%</td> </tr> <tr> <td><b>Prefer not to say</b></td> <td>9%</td> <td>6%</td> <td>8%</td> <td>8%</td> <td>9%</td> <td>8%</td> </tr> <tr> <td><b>Declaration rate</b></td> <td>94%</td> <td>98%</td> <td>95%</td> <td>95%</td> <td>98%</td> <td>94%</td> </tr> <tr> <td><b>Not surveyed</b></td> <td>6%</td> <td>2%</td> <td>5%</td> <td>5%</td> <td>2%</td> <td>6%</td> </tr> </tbody> </table> <p>Newport data is in line with the IPS average, but has a higher percentage of staff recording religions other than Christian than Belfast, Durham and Liverpool regional offices. The data contained in earlier versions of the document expanded on the “other” section by providing the breakdown of staff selecting Buddhist, Hindu, Jewish, Muslim or Sikh as their religion. However, concerns were expressed during the review process that members of staff could be identified due to the low percentages in the results for some regions; therefore the data has been expressed as above. Potential impacts on staff and customers were considered for each religion specified.</p>		<b>IPS</b>	<b>Belfast</b>	<b>Durham</b>	<b>Liverpool</b>	<b>Newport</b>	<b>Peterborough</b>	<b>Christian</b>	59%	82%	65%	74%	59%	48%	<b>Other</b>	26%	10%	23%	13%	30%	38%	<b>Prefer not to say</b>	9%	6%	8%	8%	9%	8%	<b>Declaration rate</b>	94%	98%	95%	95%	98%	94%	<b>Not surveyed</b>	6%	2%	5%	5%	2%	6%
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<b>Marriage &amp; Civil Partnership</b>	<p><b>Evidence:</b> No Adelphi report data is available for the marriage and civil partnership area. There are 10 known couples where both partners are employed by IPS and work in the Newport Regional Office.</p>																																										
<b>Pregnancy &amp; Maternity</b>	<p><b>Evidence:</b> No Adelphi report is available covering the number of staff who have declared a pregnancy or are currently on maternity leave There are 8 members of staff in Newport who have declared a pregnancy or are currently on maternity leave.</p>																																										
<b>Caring responsibilities</b>	<p><b>Evidence:</b> No data is currently available from the HR Adelphi system. If data needs to be compiled for comparison purposes, local surveys should be undertaken.</p>																																										

<b>Working patterns</b>	<b>Evidence:</b>		
	A summary of working patterns data per IPS office is provided in the following table:		
		Full Time	Part Time
	<b>Belfast</b>	78%	22%
	<b>Durham</b>	65%	35%
	<b>Liverpool</b>	65%	35%
	<b>Newport</b>	69%	31%
	<b>Peterborough</b>	63%	37%
<b>IPS Total</b>	70%	30%	
	Newport breakdown:		
	31 staff work evening shift on a variety of work patterns – 10 of these are full-time		
	31 staff are employed on Extended Working Hours Contracts – 5 on a part-time pattern and 26 on a full-time, 4 day pattern		
	86 members of staff work part-time. Working patterns range from 2 full days per week to 5 part-days and		
	12 of these work term-time hours		

<b>Grade</b>	<b>Evidence:</b>						
	A summary of grade data per APC is provided in the following table:						
		<b>IPS</b>	<b>Belfast</b>	<b>Durham</b>	<b>Liverpool</b>	<b>Newport</b>	<b>Peterborough</b>
	<b>PO1</b>	16.48%	14.37%	18.86%	14.73%	15.12%	18.67%
	<b>PO2</b>	5.26%	9.77%	10.26%	10.99%	9.57%	9.04%
	<b>PO3</b>	36.28%	45.98%	47.30%	42.86%	50.93%	51.81%
	<b>EO</b>	24.14%	19.54%	13.31%	18.68%	16.05%	13.25%
	<b>HEO</b>	8.22%	5.75%	5.41%	6.59%	4.32%	5.02%
	<b>HEO ACC</b>	0.07%	0.00%	0.00%	0.00%	0.31%	0.00%
	<b>SEO</b>	5.07%	3.45%	3.19%	3.96%	2.78%	1.41%
	<b>SEO ACC</b>	0.15%	0.57%	0.14%	0.00%	0.00%	0.20%
<b>G7</b>	2.93%	0.00%	1.25%	1.98%	0.31%	0.40%	
<b>G6</b>	0.99%	0.57%	0.28%	0.22%	0.62%	0.20%	
There are no significant differences between the grade breakdown for Newport and other regions.							

Do you have information on target market/customers:				
Age	Yes	✓	No	
Disability	Yes		No	✓
Gender	Yes	✓	No	
Gender Identity (Transsexual/Transgender)	Yes		No	✓
Lesbian, Gay, Bisexual	Yes		No	✓
Race	Yes	✓	No	
Religion and Belief	Yes	✓	No	
Marriage & Civil partnership	Yes	✓	No	
Pregnancy & Maternity	Yes		No	✓
Caring responsibilities	Yes		No	✓
Working patterns	Yes		No	✓
Grade	Yes		No	✓

Please provide details of the information or data you have

Age	<p><b>Evidence:</b></p> <p>Passport holders' dates of birth available from PASS Main Index records.</p> <p>Further information on age within Newport catchment areas can be obtained from ONS/National Census records. 52% of the population is aged between 20 and 59.</p>
Disability	<p><b>Evidence:</b></p> <p>Teleperformance record details of customers with particular needs attending IPS counters and ION offices.</p> <p>Census data can provide the number of people who have declared long term illness, health problems or disability but no specific details are available.</p> <p>However, it should be noted that the needs of this customer group should be met by adhering to legal requirements for premises.</p> <p>16.9% of the working age population has a Disability recognised under the DDA. Of these, 40% are economically inactive.</p>
Gender	<p><b>Evidence:</b></p> <p>Gender of current passport holders can be obtained from Main Index records.</p> <p>Further information on gender within Newport catchment areas can be obtained from ONS/National Census records.</p> <p>The unemployment rate is slightly higher amongst females than males. More men than women have a disability recognised under the DDA.</p>
Gender Identity	<p><b>Evidence:</b></p> <p>No evidence</p>

<b>Lesbian, Gay, Bisexual</b>	<p><b>Evidence:</b></p> <p>Survey responses are voluntary, however the results of the Integrated Household Survey undertaken between April 2009 and March 2010 yielded the following results for the Welsh population:</p> <p>95.6% heterosexual  1.3% gay, lesbian or bisexual  0.4% other  2.7% chose not to respond to the question</p>
<b>Race</b>	<p><b>Evidence:</b></p> <p>Census data is available for the local population providing the number of households and a breakdown of race. Across Wales, the breakdown is as follows:</p> <p>96.3% white  1.6% Asian or Asian British  2.0% other</p>
<b>Religion and Belief</b>	<p><b>Evidence:</b></p> <p>Census data is available, although response to this question on the census form is voluntary. The breakdown according to the Integrated Household Survey 09-10 is as follows:</p> <p>69% Christian  28% No religion  1.2% Muslim  1.7% Other</p>
<b>Marriage &amp; Civil Partnership</b>	<p><b>Evidence:</b></p> <p>Census data is available for Newport catchment area detailing the number of households currently in a marriage; however this will be out of date since the last census took place in 2001. Data relating to Wales follows:</p> <p>44.5% of the population are married  8.7% are divorced  9.4% are widowed  No data available for Civil Partnerships</p>
<b>Pregnancy &amp; Maternity</b>	<p><b>Evidence:</b></p> <p>No evidence</p>
<b>Caring Responsibilities</b>	<p><b>Evidence:</b></p> <p>Census data from 2001 state that across Wales:</p> <p>24% of households comprise a married couple with children  10.6% of households are a lone parent  11.7% of the population provide unpaid care</p>
<b>Working patterns</b>	<p><b>Evidence:</b></p> <p>No evidence</p>
<b>Grade</b>	<p><b>Evidence:</b></p>

	No evidence
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Step 3: Gathering Evidence through Stakeholder Engagement: Is there a potential issue for an equality group (or strands)?

There are a variety of ways you can consult with people but it is important that you take account of people's different needs. Follow this link to view the Home Office guide on working with partners and stakeholders.

[http://www.homeoffice.gsi.gov.uk/partnership\\_working/index.asp](http://www.homeoffice.gsi.gov.uk/partnership_working/index.asp)

Please provide details of groups and organisations you have consulted

<b>Age</b>	The project team will engage with a wide range of stakeholders, involving staff within various adult age groups. Input has also been sought from Age UK.
<b>Disability</b>	Consultation with HODS, with representative being invited to local workshops/committee meetings. Feedback was also requested from RNIB and RNID.
<b>Gender</b>	Consultation with a variety of stakeholders across IPS and externally will establish any gender issues. Stakeholders consulted include Home Office Women, Welsh Office Equality Representative, Newport City Council and Citizens First Wales.
<b>Gender Identity</b>	Consultation with a: gender group will establish any specific issues relating to gender identity. The project team will invite a representative from this group to attend a workshop or review appropriate project documentation.
<b>Lesbian, Gay, Bisexual</b>	Consultation with Spectrum will establish any issues in this area, with representative being invited to local workshops/committee meetings. Externally, input has also been sought from Stonewall.
<b>Race</b>	Consultation with the Equality and Human Rights Commission and The Network, with a representative being invited to workshops/committee meetings.
<b>Religion and Belief</b>	Externally, consultation with the Equality and Human Rights Commission, and internal consultation with Home Office and Civil Service staff network groups will provide input to the needs of all groups identified. Groups consulted include the Home Office Sikh Association, Home Office Islamic Network and The Network.
<b>Marriage &amp; Civil Partnership</b>	The project team will engage with a wide range of stakeholders, involving staff within various adult age groups including those who are in a marriage or civil partnership.
<b>Pregnancy &amp; Maternity</b>	Consultation with female stakeholders and the Home Office Women staff network group will uncover any specific impacts on staff who are pregnant or on maternity leave
<b>Caring Responsibilities</b>	Consultation with a wide range of stakeholders will include people who have caring responsibilities
<b>Working Patterns</b>	The project will ensure that part-time and EWH staff become involved with and are included in the consultation process
<b>Grade</b>	The project team will engage with a wide range of stakeholders, involving staff across all working grades in IPS, including staff based in the Newport Regional Office.

Step 4: What does the information you gathered at Step 2 and Step 3 tell you about how the activity or change might impact on the different groups?

Please provide an analysis of any **potential adverse impacts** you have identified from the evidence gathered. Where adverse impact has been identified, please explain your plans to mitigate the impacts.

	<b>Impacts</b>	<b>Mitigations</b>
<b>Age</b>	<p>Surplus staff will enter a redeployment pool and redundancies may be inevitable. Older members of staff may feel forced into early retirement. If this occurs, there will be a taper effect on the compensation as part of the severance package will be utilised to embark on early retirement.</p> <p>Staff aged 60+ are eligible to retire but are required to give 4 months notice. Staff members aged 60 and over who are made compulsorily redundant are entitled to a notice period of 12 months where service length is less than 10 years and 9 months where service length is 10-25 years. This notice period commences when the redundancy notice is issued. The Restructuring, Redeployment and Redundancy policy also states that a Voluntary Early Release Scheme will be offered prior to compulsory redundancies. 9% of the workforce in Newport falls within the 60-64 age band and a further 3% fall within the 65+ age band. It is unclear whether these notice periods can be observed given the timescales for the restructure and the requirement for a period of reflection when staff members are informed of the risk of redundancy. This could result in increased costs if these members of staff need to be compensated in lieu of the notice period. It would be discriminatory to issue surplus letters to staff aged over 60 prior to others.</p> <p>Staff may be offered Voluntary</p>	<p>IPS must use the Cabinet Office scheme (CSCS) and the Home Office policy (RRR) for managing exit. This includes clear guidance on Retirement, Voluntary and Compulsory Redundancy.</p> <p>Expert financial advice will be made available for all, but will provide specific information for those considering early retirement, and the employee assistance programme will also be able to provide guidance</p> <p>IPS will not disadvantage those who are entitled to a longer notice period by declaring them surplus earlier. All staff without CSC roles would be declared surplus at the same time (unless there is an advantage to a group of staff to do otherwise), and payment in lieu of notice will be considered.</p> <p>HR Business Partners to be available to assist and advise staff via local surgeries and the provision of clear guidance.</p> <p>These are the terms of the CSCS and</p>

	<p>Redundancy where the 3 month redeployment period has ended. Staff aged over 50 can draw an early pension, but staff under 50 will have their pension frozen until retirement.</p> <p>The Restructuring, Redeployment and Redundancy policy places a 21 year service cap on compensation payments. Members of staff with more than 21 years service will see redundancy payments limited to 21 months salary rather than fully reflecting their length of service.</p> <p>If there is a change to the front office/public counter location, customers may have to travel further to attend the office. This could have an adverse impact on older, less mobile customers.</p>	<p>RRR policy – all staff members have an option to exit via voluntary redundancy but some also have other options.</p> <p>These are the terms of the CSCS. Expert financial advice will be made available for all and the employee assistance programme will also be able to provide guidance.</p> <p>Front office location is yet to be determined; however site requirements include accessibility for all customers and staff. A separate EIA will be conducted once new premises have been identified</p>
<b>Disability</b>	<p>There may be changes to benefits available for any disabled staff member made redundant as a result of the Government spending review, however the details are not yet known</p> <p>Staff may require a degree of flexibility in working hours or part-time working patterns depending on the severity of the disability.</p> <p>Fewer opportunities to redeploy staff with disabilities, therefore staff may struggle more to find work.</p> <p>The Millbank venue for training, support and assistance is located in London – it is more difficult for those with a disability to travel to London.</p> <p>Staff/Customer access and availability of parking and public transport at the new Customer Service Centre site to be considered to assist staff and customers who have a disability.</p>	<p>As the impact is not yet known IPS will consider this if and when the information becomes available.</p> <p>Jobs available in the Newport Customer Service Centre will include the usual IPS flexible working options, including individually tailored patterns if necessary to prevent staff with disabilities being excluded from applying for posts.</p> <p>The Guaranteed Interview Scheme for staff with disabilities applies to Newport CSC roles and also roles in OGDs</p> <p>The support package for all staff in Newport will be based in Newport and no one will be required to travel to London to access support, training or redeployment activities.</p> <p>Legal obligations will be incorporated into the design requirements for the new public counter site. A further EIA will be undertaken when the decision has been made and the location is known.</p>



<b>Gender</b>	The majority of the staff members in Newport are female. In addition, a high proportion of female staff members traditionally work part-time hours. Part-time posts may be more difficult to find in the Newport area for staff facing redundancy.	Briefings and training courses will be timetabled to maximise attendance across all working patterns. The proportion of staff receiving risk of redundancy confirmation, and redeployment opportunities offered, needs to reflect the office gender statistics to prevent either gender being disproportionately affected by the proposed closure. Posts remaining in the revised Customer Service Centre structure need to include flexibility for part-time work.  IPS will make every effort to ensure a similar proportion of women will be employed in the Newport CSC operation.
<b>Gender Identity</b>	Anyone seeking gender reassignment surgery must first undergo a real life test which involves experiencing daily life in the preferred gender for at least one year prior to the commencement of surgery. There is a risk that redundancy or redeployment to another area could jeopardise this process. Job loss could result in the NHS medical authority deciding that the person is not coping adequately in society in the preferred gender, and relocation/redeployment could transfer an affected member of staff to another Health Authority who may not agree to fund the reassignment process.	At present it cannot be determined whether any member of staff in Newport will be affected in this way; IPS is reliant on any affected member of staff declaring an intention to undergo gender reassignment.
<b>Lesbian, gay, bisexual</b>	No impact affecting LGB staff and customers only. Impacts recorded for other diversity strands may also affect lesbian, gay and bisexual staff.	Staff will receive support from IPS as outlined previously. In addition, Spectrum will offer training on CV writing, guidance on preparing for selection exercises and mock interviews for all LGB Home Office Staff. The Stonewall Workplace Equality Index lists gay-friendly employers in the UK and provides specific information relating to employers in Wales. This will be made available as part of the support package.
<b>Race</b>	No impact affecting specific races only. Impacts recorded for other diversity strands may also affect staff of a particular race	<b>The Race for Opportunity equality index provides information on organisations with positive race diversity records. This will be made available as part of the support package</b>
<b>Religion and Belief, Political opinion</b>	No impact adversely affecting one particular group/faction; however staff remaining in post who observe daily religious obligations could be adversely affected by a change in office location.	IPS will ensure that any new site considered for the Newport Customer Service Centre takes this into account, along with flexibility in working patterns to accommodate religious obligations. Managers will conduct one-to-one discussions with staff to establish individual needs. A separate EIA will be conducted when premises have been identified.

		IPS will ensure that the proportion of staff receiving risk of redundancy confirmation, and redeployment opportunities offered, reflects the office religion and belief statistics.
<b>Marriage &amp; Civil Partnership</b>	There are staff members whose partner also works in the Newport office, and staff members who are the main breadwinner in the family – office closure, lack of redeployment opportunities and redundancy will therefore have a larger impact on their household income.	Support and training will be provided to staff via surgeries/drop in centre in Newport, using a combination of expertise currently located in IPS Newport, other in-house specialists and/or external agencies in the local area. In addition, the support package can be tailored to the needs of staff in Newport taking into consideration the external employment opportunities available in the area and the skill set currently held by staff. Individual circumstances will be considered when scheduling access to support and training, including prioritising one partner if requested.
<b>Pregnancy &amp; Maternity</b>	<p>Female staff on maternity leave will not have the same access to help and advice.</p> <p>Pregnancy places added stresses on physical and mental wellbeing – announcement and job losses may have an increased impact on the health of a pregnant member of staff.</p> <p>Under an EU working directive, staff members on maternity leave have protected posts, i.e. a post must be held for affected staff in the revised Customer Service Centre structure. The member of staff may choose to end maternity leave early to take up the post, but is entitled to remain on maternity leave which could necessitate the role being filled temporarily by another member of staff. There are currently 8 members of staff in Newport who have declared a pregnancy or are on maternity leave.</p>	<p>Advice and guidance will be provided via KITS packs and all information relating to the closure will be coordinated and sent promptly from a central point. Staff on maternity leave will be offered the option to attend any briefings for staff. One-to-one advice and coaching sessions could be arranged via telephone.</p> <p>Line managers will be advised to closely monitor the members of staff and IPS will consider specialist training on identifying and managing stress if required.</p> <p>Clear communication to all staff in Newport explaining the situation and the reason why posts will be offered to staff on maternity leave.</p>
<b>Caring Responsibilities</b>	Staff members in post who are the main breadwinner in the household and those with caring responsibilities may be impacted more heavily by closure, lack of redeployment opportunities and redundancy.	Support and advice provided to be tailored to the specific needs of staff.

	<p>Limited opportunities available to redeploy staff since OGDs in area are also reducing staff numbers (e.g. Newport employed surplus DWP staff following their restructure in early 2010). Where posts can be found, the likelihood is that staff will need to travel further to work which may disadvantage part time staff or staff with caring responsibilities.</p> <p>The Millbank venue for training, support and assistance is located in London. It may be more difficult for those with caring responsibilities to travel to London.</p>	<p>Efforts made to seek redeployment opportunities with flexible working patterns. Staff members will be encouraged to use the CIC employee advisory service to establish avenues of external help and support that may be available for those with caring responsibilities.</p> <p>The support package for all staff in Newport will be based in Newport and no one will be required to travel to London to access support, training or redeployment activities.</p>
<b>Working Patterns</b>	<p>It may be more difficult to redeploy staff on flexible working patterns or part time hours.</p> <p>Those working outside full-time core hours have less opportunity to participate in training offered to surplus pool, and there is an increased likelihood of missing face to face briefings.</p> <p>Part year appointment staff members work January to August/September only. The date when affected staff will be declared surplus is yet to be determined, however part-year appointments need to be afforded the same opportunities as full-year staff within a redeployment pool.</p> <p>For staff who are successful in securing CSC roles, those working part time or flexible working patterns could be adversely affected by a change in location, for example where it results in an increase in travel time to and from office.</p>	<p>Efforts will be made to seek redeployment opportunities with flexible working patterns. Staff members will be encouraged to use the CIC employee advisory service to establish avenues of external help and support available.</p> <p>Briefing sessions and training will be scheduled to maximise attendance as far as possible. Wash-up meetings will be arranged for staff members who miss face-to-face briefings. IPS is considering providing guidance and resources via a secure website accessible from home at any time.</p> <p>IPS is considering making representations to exceptionally allow an extended surplus period for PYA staff – effectively declaring them surplus earlier. This would give access to the redeployment register for a longer period and allow practical support to be given during the PYA normal working period.</p> <p>This will be considered once premises are identified. A Further EIA will be completed when the location has been decided.</p>
<b>Grade</b>	<p>Staff members at lower grades (PO1-PO3) have less opportunity to get involved in decision making and provide input into changes.</p>	<p>Face to face briefings held for staff of all grades and a dedicated email inbox has been created to afford staff the opportunity to raise questions and concerns. Relevant and timely</p>

	<p>Increased competition for jobs at lower grades due to higher staff numbers being eligible to apply.</p> <p>Staff members at lower grades may have had less opportunity to gain transferrable skills.</p> <p>Grade differences between counter and ION staff may impact on who is eligible for customer service centre roles.</p>	<p>communications issued.</p> <p>Staff declared surplus will be offered one-to-one coaching and assistance on CV writing, job applications and interview techniques. CSC roles will be selected based on skills rather than job matching.</p> <p>Training and support offered will be tailored to the needs of staff to ensure equality of opportunity to gain transferrable skills for employment either within or external to the civil service. This will be provided locally by IPS and external providers.</p> <p>Customer Service Centre Roles have been designed and submitted for JEGS. The resulting outcome of JEGS could remove the current imbalance.</p>
<b>Cultural impacts</b>	<p>Legal requirement to include Welsh language applications and interviews - staff currently processing these applications may be declared surplus.</p>	<p>Welsh language staff presence will be maintained within the Customer Service Centre in Newport to prevent degradation of the current level of service offered.</p>

### Step 5: Will you be making any changes to your activity?

If, in order to mitigate any potential adverse impacts on equality, you propose to make changes to the activity / change, or the way in which the activity / change is implemented, please provide details.

<b>What</b> action will be taken?	<ul style="list-style-type: none"> <li>PCS has requested that the proposal be reconsidered based on the high percentage of women employed in the Newport Regional Office.</li> </ul>																				
	<table border="1"> <thead> <tr> <th></th> <th><b>Female</b></th> <th><b>Male</b></th> </tr> </thead> <tbody> <tr> <td><b>Belfast</b></td> <td>64%</td> <td>36%</td> </tr> <tr> <td><b>Durham</b></td> <td>67%</td> <td>33%</td> </tr> <tr> <td><b>Liverpool</b></td> <td>66%</td> <td>34%</td> </tr> <tr> <td><b>Newport</b></td> <td>73%</td> <td>27%</td> </tr> <tr> <td><b>Peterborough</b></td> <td>71%</td> <td>29%</td> </tr> <tr> <td><b>IPS Total</b></td> <td>64%</td> <td>36%</td> </tr> </tbody> </table> <p>Whilst Newport has the highest percentage of women employed across all IPS sites (73% female against an IPS-wide average of 64%), IPS does have a relatively high proportion of women employed overall. The proportion of women in Peterborough is also very close to the proportion in Newport (70% compared to 73%). The percentage of women employed in Newport is therefore not so significant, when compared to other APCs and IPS as a whole, to reconsider the proposal.</p> <ul style="list-style-type: none"> <li>Staff declared surplus will be informed of current benefits available or directed to appropriate sources of information.</li> </ul>		<b>Female</b>	<b>Male</b>	<b>Belfast</b>	64%	36%	<b>Durham</b>	67%	33%	<b>Liverpool</b>	66%	34%	<b>Newport</b>	73%	27%	<b>Peterborough</b>	71%	29%	<b>IPS Total</b>	64%
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<b>Peterborough</b>	71%	29%																			
<b>IPS Total</b>	64%	36%																			

	<ul style="list-style-type: none"> <li>▪ Regular and timely communications issued to staff in Newport with KITS packs issued promptly to staff not currently attending work.</li> <li>▪ Newport managers to encourage staff to make use of Employee Assistance Programme.</li> <li>▪ Local SMT to consider setting up a drop-in centre providing advice, support and information.</li> <li>▪ L&amp;D to consider the training opportunities that can be offered to staff declared surplus.</li> <li>▪ HQ Policy team to review Welsh Language requirements and procedures.</li> <li>▪ Estates programme to take account of local issues when deciding the location of the new office.</li> <li>▪ Project team to seek regular updates on progress of CSN Transformation Programme.</li> <li>▪ Contact businesses and car parks in surrounding area of new premises to establish the availability of disabled parking spaces.</li> <li>▪ Include public transport information on appointment confirmation letters and Newport office location map/directions on direct gov website.</li> <li>▪ TP call scripts will be amended to ensure directions and information provided to customers is accurate.</li> <li>▪ Staff familiarisation visits will be scheduled prior to any office relocation.</li> </ul>
<p><b>Who</b> will take that action?</p>	<ul style="list-style-type: none"> <li>▪ Newport Regional Manager to consider bringing financial and benefit experts in to address staff concerns.</li> <li>▪ Relocation project team will take forward any actions relating to the new site.</li> </ul>
<p><b>When</b> will that be taken?</p>	<p>Dates TBC once the detailed implementation plan is developed.</p>
<p>How will that action mitigate potential adverse impact?</p>	<p>Expert advice will assist staff with financial planning for redundancy.  KITS packs will ensure absent staff members do not miss important communications.  Training opportunities made available to those in the surplus pool will support staff in the search for alternative employment.  Maintaining contact with CSN transformation team will enable timely and relevant updates/communications to be provided to staff in Newport Regional and ION offices.  Public Transport Details will assist customers and staff with travel arrangements to the office, and disabled car parking information can be provided to customers and staff.  Familiarisation visits will assist a smooth transition to any new premises.</p>

Step 6: Does your activity or change provide the opportunity to promote equality of opportunity or good relations?

Please tick Yes or No for each diversity strand

<b>Age</b>	Yes		No	✓
<b>Disability</b>	Yes	✓	No	
<b>Gender</b>	Yes		No	✓
<b>Gender Identity</b>	Yes		No	✓
<b>Lesbian, gay, bisexual</b>	Yes		No	✓
<b>Race and Ethnicity</b>	Yes		No	✓
<b>Religion and Belief</b>	Yes		No	✓
<b>Marriage &amp; Civil Partnership</b>	Yes		No	✓
<b>Pregnancy &amp; Maternity</b>	Yes		No	✓
<b>Caring Responsibilities</b>	Yes		No	✓
<b>Working Patterns</b>	Yes	✓	No	
<b>Grade</b>	Yes		No	✓

If yes please provide details

<b>Age</b>	
<b>Disability</b>	Current RO public office is located on 4 <sup>th</sup> Floor with access via lift. Opportunity to source a ground floor public office to house RO and ION functions which provides easier access for disabled customers and staff.
<b>Gender</b>	
<b>Gender Identity</b>	
<b>Lesbian, Gay, Bisexual</b>	
<b>Race</b>	
<b>Religion and Belief</b>	
<b>Marriage &amp; Civil Partnership</b>	
<b>Pregnancy &amp; Maternity</b>	
<b>Caring Responsibilities</b>	
<b>Working Patterns</b>	Potential to offer flexible working patterns to front office staff within the newly designed Customer Service Centre.
<b>Grade</b>	

Generally, all public services located under one roof results in an improved customer experience for all staff and visitors.

Step 7: Based on the work you have done so far, rate the level of relevance of your activity/change

Please indicate a positive or negative impact by marking a number between 1 and 5 (1 = positive/ 5 = negative) in one box only (High, Medium, Low) for each equality strand.

	Age	Disability	Gender	Gender Identity	LGB	Religion & belief	Race	Marriage & Civil Partnership	Pregnancy & Maternity	Caring responsibilities	Working patterns	Grade
<b>High</b>												
<ul style="list-style-type: none"> <li>- There is substantial evidence that people from different groups or communities are (or could be) differently affected by the activity or change (positively or negatively)</li> <li>- There is substantial public concern about the activity/change, or concerns have been raised about the potential impact of the activity by relevant bodies</li> <li>- The activity or change is relevant to all or part of the respective general duty, in the case of race, disability and gender.</li> </ul>	<b>4</b>											<b>4</b>
<b>Medium</b>												
<ul style="list-style-type: none"> <li>- There is some evidence that people from different groups or communities are (or could be) differently affected (positively or negatively).</li> <li>- There is some public concern about the activity/change.</li> <li>- The activity or change is relevant to parts of the respective general duty, in the case of race, disability and gender.</li> </ul>		<b>3</b>	<b>4</b>					<b>4</b>	<b>2</b>	<b>4</b>	<b>4</b>	
<b>Low</b>				<b>3</b>	<b>3</b>	<b>3</b>	<b>3</b>					

<p>- There is little or no evidence that some people from different groups or communities are (or could be) differently affected (positively or negatively).</p> <p>- There is little or no evidence of public concern about the activity/change.</p> <p>- The activity or change has little or no relevance to the respective general duty, in the case of race, disability and gender.</p>												
<p><b>Unknown</b></p>												
<p>- No evidence or data has been gathered therefore an assessment cannot be made. <b>Return to <a href="#">Step 3</a>.</b></p>												

The closure of application processing in Newport will affect all staff in the office. Impacts on customers are significantly lower as a Customer Service Centre will remain in the Newport area; therefore no area has been allocated a maximum score.

Whilst there is some evidence that disabled staff will be differently affected, the impact has been scored as 3 (neither positive nor negative), as both positive and negative impacts have been identified within the Disability strand.

Similarly, there is some evidence that those who are pregnant or on maternity leave will be affected differently, but the overall score has been recorded as a 2 (slightly positive) as the positive impacts outweigh the negative, particularly when the mitigation activities are factored in.



Step 8: Please explain how you will monitor and evaluate the activity or change to measure progress?

<b>How will monitoring be undertaken?</b>
<ul style="list-style-type: none"><li>▪ A Staff Consultation Group will be set up to support transition and communicate key messages.</li><li>▪ Minutes from meetings and workshops will be circulated to stakeholders.</li><li>▪ Staff survey will take place following relocation and co-location of RO counter and ION office.</li><li>▪ Customer satisfaction survey will take place following relocation and co-location with results compared to the results from customer surveys in the current building.</li><li>▪ Customer comment cards completed and submitted at public counter will supply further feedback. Comments will be included in regular reports compiled by the Customer Service Team.</li><li>▪ Contact will be made with Equality and Human Rights Commission within 6 months of move.</li><li>▪ IPS conduct regular reviews of policies relating to Disability, Health &amp; Safety, and work/life balance etc. Any issues presenting can feed into these reviews and the outcomes can be used to monitor progress.</li><li>▪ Exit interviews will be conducted with each member of staff prior to departure date.</li></ul>
<b>When will monitoring take place?</b>
Monitoring will form part of the existing project review points during the restructure process. Surveys will take place following an appropriate "settling-in" period for staff.
<b>Who is responsible for undertaking monitoring?</b>
The Executive Director of Operations and Director of Business Change will oversee via the Operations Development Programme. The Newport Regional Manager and Customer Service Network manager will monitor ongoing progress.

Step 9: Do you need to carry out a further review of the activity or change impact following implementation?

**There are no plans to roll-back should the proposed closure be implemented.**

**Please tick Yes or No for each diversity strand**

<b>Age</b>	Yes		No	✓
<b>Disability</b>	Yes		No	✓
<b>Gender</b>	Yes		No	✓
<b>Gender Identity</b>	Yes		No	✓
<b>Lesbian, Gay, Bisexual</b>	Yes		No	✓
<b>Race</b>	Yes		No	✓
<b>Religion and Belief</b>	Yes		No	✓
<b>Marriage &amp; Civil Partnership</b>	Yes		No	✓
<b>Pregnancy &amp; Maternity</b>	Yes		No	✓
<b>Caring Responsibilities</b>	Yes		No	✓
<b>Working Patterns</b>	Yes		No	✓
<b>Grade</b>	Yes		No	✓

**If you have ticked yes to any of the boxes please indicate how you plan to gather further evidence of the potential impacts**

How will you collect further data, commission research and analyse the results?	
What alternative ways will you use to collect information?	
How will you consult further with people affected by the activity, change or service?	

## Step 10.1: Sign off & Authorisation

This form should be completed by the officer who is responsible for completing the assessment. You should have completed the following steps:

		Yes	No
<b>Step 1</b>	Defined the aims of your activity or change.	✓	
<b>Step 2</b>	Identified what we already know (i.e. what the existing evidence base tells us). If the activity or change affects people then proceed to Step 2. If the activity or change does <u>not</u> affect people then proceed to step 10.2	✓	
<b>Step 3</b>	Consulted and involved equality stakeholders (proportionately and relevantly)	✓	
<b>Step 4</b>	Analysed the evidence gathered at Step 2 and Step 3 (i.e. what this all means in relation to our policies?)	✓	
<b>Step 5</b>	Considered necessary changes & identified actions to mitigate potential adverse impact identified in Steps 2, 3 & 4	✓	
<b>Step 6</b>	Identified opportunities to promote equality and promote good relations between people from different ethnic and racial backgrounds	✓	
<b>Step 7</b>	Measured differential impact	✓	
<b>Step 8</b>	Outlined arrangements for monitoring & evaluation	✓	
<b>Step 9</b>	Assessed whether further evidence gathering is necessary following implementation	✓	

This impact assessment should now be authorised by a Grade 6 or higher.

Guidance for officer responsible for authorisation of this EIA:

1. Have all relevant Steps been completed?
2. Are you satisfied that all risks and issues identified at **Step 2, Step 3 and Step 4** have been resolved and / or mitigated?
3. Have equality stakeholders been consulted and disabled people involved as required in **Step 3**?

If you are satisfied that each of the above points have been addressed please complete the table below

### 3.10.1 EIA Sign-off

<b>Activity / Business change Title</b>	Closure of the Newport Regional Office by May 2012 and establishment of a Customer Service Centre in Newport to provide priority services and authentication interviews.
<b>Strategic Outcome</b>	To enable IPS to become more efficient and financially independent, providing services without the need for support from the taxpayer
<b>Name of Team</b>	IPS Operations Development Programme, primarily delivered by the Newport Office Closure Project
<b>Directorate</b>	Operations and Organisational Transformation
<b>We have completed the equality impact assessment for this activity / Business Change.</b>	Name: Alison Skillen  Position: Operational Expert  Date: 25/02/2011
<b>Authorisation by Grade 6 or higher</b>	Name: Paul Pugh  Position: Executive Director of Operations  Date: 07/03/2011

**On completion of this step, the completed equality impact assessment will be emailed to the Internal Communications team to be published on the IPS website.**

## List of stakeholders consulted to date

Andrew Park	Business Change Director
Paul Luffman	Head of Engagement, Inclusion and Diversity
Philippa Manley	Business Change Manager
Huw Thomas	Head of Operational Expertise Unit
Paul Pugh	Executive Director of Operations
Alan Brown	Head of Policy
Hilary Berry	Newport Regional Manager
David Hay	Temporary Head of Interview Network
Mark Maguire	Deputy Director of Finance
Khayrun Rahman	Employee Engagement Consultant
Cathy Gibbons	Senior Employee Relations Manager
Carol Giannini	Head of External Stakeholder Engagement
Dee Evans	a: gender
Farhana Shaukat	The Network
Mandeep Soin	Home Office Sikh Association
Carl Garside	Spectrum
Paul Bradley	Spectrum
Dev Sood	PCS
Paul McGoay	PCS
Denise Speakman	PCS
Anne-Louise McKeon-Williams	PCS
Sharon Edwards	PCS
Paul Jones	PCS
Ben Rapier	PCS
Sharon Dower	Home Office Women
Vicki Cole	Home Office Women
Alvin Kofi	Home Office Disability Support Network
Christine Ward	Head of Customer Service
Lindsey Marks	Home Office Islamic Network
Viv Barnes	RNIB
Vicky Hemming	RNID
Madeline Lasko	Stonewall
Tracy Lee	Newport City Council Equality Lead
Matthew Evans	Newport City Council
Cheryl Gillan	Secretary of State for Wales
Meri Hughes	Welsh Language Board
Jonathan Jones	Citizens First Wales
Matthew Williams	Equality and Human Rights Commission
Kate Bennett	Equality and Human Rights Commission Wales
Naomi Alleyne	Welsh Local Government Association
Andy Regan	Welsh Office Equality Representative
Ms Kelly	Age UK

**In addition to the above list, staff based in Newport have received face to face briefings and been invited to feedback concerns and comments both during these meetings and via the dedicated email inbox, daily “Take 5” meetings and the monthly “Let’s Talk” process. Equality impacts identified have been incorporated.**

## Data Sources

- ONS
- 2001 Census Results
- Integrated Household Survey Apr 2009-March 2010
- Newport City Council Website
- Regional Economic & Labour Market Profile Sept 2010
- Adelphi Diversity Data reports
- DataView diversity reports
- HR Business Partners
- Engagement, Inclusion and Diversity Team

## Glossary

I&M	Impact & Mitigation Assessment
RO	Regional Office
ION	Interview Office Network
ONS	Office of National Statistics
EPA	Electronic Passport Application
VER	Voluntary Early Release
DDA	Disability Discrimination Act
L&D	Learning & Development
KITS	Keeping in Touch Scheme
OGD	Other Government Department
SMT	Senior Management Team
CSN	Customer Service Network
APC	Application Processing Centre

## Copy of letter and diversity data\* sent to external stakeholders



EIA letter.doc (271 KB)



EIA Diversity Data.doc (160 KB...)

\*Diversity data forwarded to stakeholders during the consultation was based on Adelphi reports run at the end of September 2010 which did not include evening shift staff and was based on a non-completion rate of almost 10%. The diversity data contained in the main body of this document was obtained from reports run on 21<sup>st</sup> February 2011 to incorporate evening shift staff and following a drive to encourage staff across IPS to complete their diversity information on Adelphi. The non-completion rate has now reduced to 5%.

# Annex 4

## Multi Criteria Analysis Methodology

IPS has undertaken detailed analysis, using the Multi Criteria Analysis (MCA) method, to establish objectively which office provided the best option for closure. The broad outline of the Multi Criteria Analysis as described in the Treasury Green book is as follows:

- A. Identify policy options for analysis
- B. Identify criteria against which options will be assessed
- C. Assess options against criteria using quantitative or qualitative data
- D. Score options against criteria on a consistent basis
- E. Weight criteria and compare options
- F. Carry out sensitivity analysis & revisit conclusions.

The criteria we used fall into groups of Cost, Affordability, Estates, People, Customers & Partners, Performance and Operational Feasibility. These were agreed with relevant stakeholders in the Application Processing Network, Finance and Strategy. Consideration was given to the respective weightings of the criteria but these were ultimately given equal weights, as they had no discernible impact on the outcome of the analysis.

The criteria and data relevant to each were built into a model, which was run to determine which closure option would be the most sensible.

### How this works in practice

#### Mechanics of the Model

Once the criteria had been agreed, raw data were gathered from across the organisation to input into the MCA model. The input data were then indexed, meaning that a relative weighting – scoring 100 for the response most indicating closure and decreasing proportionately – was determined for each data set. Indexed values were then allocated a score based on the weights given to each of the criterion. A total score was then produced by summing the output values.

#### Worked Example – Write Offs (Reduced or Zero Value of Assets)

Data were gathered from IPS’s accounting system on the amount IPS would need to Write Off by closing each office. The raw data for Write Offs is as follows:

Scenario	Close Belfast	Close Durham	Close Liverpool	Close Newport	Close P’borough
Write offs (£k)	£4,302	£626	£4,346	£1,253	£928

Once Indexed each office is awarded a relative value as follows (the lowest Write Off is most preferable when deciding to close an office, so Durham is given the maximum indexed score because it has the lowest write-off):

Scenario	Close Belfast	Close Durham	Close Liverpool	Close Newport	Close P’borough
Write offs (indexed)	15	100	14	50	67

Write Offs contribute 6% of the total score which provides the following relative weighted score to each office:

Scenario	Close Belfast	Close Durham	Close Liverpool	Close Newport	Close P’borough
Write offs (score)	1	6	1	3	4

Details of the exact scenarios, data and weighting are provided below.

## Original Multi-Criteria Analysis results

Rank	Office	Score	One-off costs (£m)	Total Spend (£m)	NPV (£m)	Total FTE in Region Closed	Backfill Needed (FTE)
1	Close Newport RO	91	6.6	514	49.259	313	0
2	Close Peterborough RO	89	8.6	515	42.546	463	182
3	Close Liverpool RO	86	9.6	511	48.703	363	73
4	Close Belfast RO	86	7.4	529	26.042	156	0
5	Close Durham RO	85	10.0	514	32.820	629	311

The parameters have to be dramatically weighted against cost as a driver in favour of the People and Productivity criteria, to substantially change the suggested order of closure. Newport heads this list because it performs less well against a basket of productivity, security and quality measures.

### Criteria

The criteria were agreed with relevant stakeholders within IPS and they were reviewed by PCS representatives during pre-consultation meetings.

Criteria & Weightings	criteria weight	internal weight	% Benefit in category	overall benefit
<b>Cost</b>	<b>100</b>			<b>17%</b>
Net Present Value (NPV)		100	33%	6%
Write offs		100	33%	6%
Payback		100	33%	6%
<b>Affordability</b>	<b>100</b>			<b>17%</b>
Cost Profile		100	100%	17%
<b>Estates</b>	<b>100</b>			<b>17%</b>
Workstation maximum potential capacity (FTE)		100	50%	8%
Empty Space		100	50%	8%
<b>People</b>	<b>100</b>			<b>17%</b>
Business Functions (HQ & Operations)		100	10%	2%
Regional Specialty		100	10%	2%
Backfill Recruitment		100	10%	2%
Staff Survey Engagement Index (%)*		100	10%	2%
Staff Survey Plan for the future (%)*		100	10%	2%
Staff Survey Managing Change (%)*		100	10%	2%
Attrition (%)		100	10%	2%
Attendance (% Average Sick per month)		100	10%	2%
VER		100	10%	2%
Security Audit		100	10%	2%
<b>Customer &amp; Partner</b>	<b>100</b>			<b>17%</b>
Customer Complaint %		100	100%	17%
<b>Performance</b>	<b>100</b>			<b>17%</b>
Weighted Average Transaction Time		100	17%	3%
Productivity Efficiency Rate		100	17%	3%
Efficiency Distribution		100	17%	3%
Quality Standard		100	17%	3%
Fraud Detection (%)		100	17%	3%
Key Performance Indicator		100	17%	3%
				<b>100%</b>

\*Note that the greyed out criteria were checked during sensitivity analysis following discussions with PCS.

PCS and Regional Managers had concerns over the use of some of the data, particularly the staff survey data because it would colour how staff respond in future, if IPS is inclined to use the findings in ways that could affect their employment. In practice, we can confirm that leaving the data in or taking it out has no material impact on the output of the model. Similarly, we deliberately left the criteria with equal weights, as PCS were concerned that weightings were subjective and we found that it made no material difference to the outcome.

## Latest MCA results

Rank	Office	Score	One-off costs (£m)	Total 10 year Spend (£m)	NPV over 10 years (£m)	Total FTE in Region Closed	Backfill Needed (FTE)
1	Close Newport RO	91	4.6	514	45.9	313	0
2	Close Peterborough RO	89	8.1	494	45.8	463	135
3	Close Durham RO	86	8.5	461	30.6	629	321
4	Close Liverpool RO	85	9.5	501	47.0	363	46
5	Close Belfast RO	81	7.2	539	16.8	156	0

Following our release of the original MCA, we performed further work to refine the model through the consultation process and by obtaining better data. The key movements between the original and latest MCA positions can be attributed to the following:

- The Cabinet Office released details of the new redundancy & early retirement arrangements. We have updated our redundancy cost calculation to reflect the revised VER terms and applied these on an individual basis, rather than using average service and salary. This has resulted in a reduction in our redundancy costs.
- The original model did not include retaining staff to run a front office counter service. This has reduced the number of backfill staff required for the Durham, Liverpool and Peterborough office closure options as some would be retained locally to operate the customer service centre.
- The social costs and benefits associated with making individuals redundant, such as the social cost of forgone salary and the private benefit of receiving unemployment related state benefits have been added to the 10 year NPVs.

**END OF DOCUMENT**