

Equality Impact Assessment for Reorganisations

This part of the Equality Impact Assessment (EIA) is triggered by an Organisational Change Assessment report. If you require support completing this form, please speak to your HR Relationship Manager or call Smart HR on extension 1000 and select option 4.

INITIAL SCREENING:

1. Service Details

Department	Finance and Corporate Services
Division	Organisation Development
Policy, proposal, strategy or function being assessed	A partial re-org of Organisation Development
Lead officer carrying out EIA Name, title and telephone number	Martin Nottage, Head of Transformation. X3542
Other officers involved in EIA (include HR Relationship Managers)	Lillian Magero
Date of Assessment	25 th November 2010

2. Proposal Details

Policy Aims, Objectives and Projected Outcomes	<p>What are the main aims, purpose and outcomes of the proposed reorganisation as detailed in the organisation change assessment.</p> <p>Over the last 12 months the public sector has seen a tremendous amount of change. For LBHF, the change drivers are both internal and external. Over this period, 8 posts have been deleted from the business transformation team resulting in a management structure that is disproportionate and costly.</p> <p>The vision and purpose of the organisation has not changed. However, the way in which the organisation approaches transformation, primarily driven by the reduction in local government funding and the need to reduce the council's level of debt, needs to change. In order to protect front line services where ever possible and meet the financial savings targets the degree of transformational change needs to be deeper, further reaching and faster paced. The consequence of not changing the way we approach transformation, in order to meet the financial savings targets, will be felt on front line services, those we seek to protect as best we can.</p> <p>In order to deliver transformation faster, deeper and within a reduced financial envelope, new roles, capability and structure are now required. A restructure will be implemented in</p>
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	<p>Organisation Development in early 2011 to establish a Transformation Management Office.</p>
<p>Intended Beneficiaries</p>	<p>Who are the main stakeholders in relation to this policy</p> <p>The main stakeholders are the staff who are impacted by the re-organisation. The impact is across 16 posts, 2 of which are vacant. This results in a maximum of 7 people at risk of redundancy. However, we are working hard to mitigate the risk of redundancy – we are in discussion with a strategic partner of the council regarding the TUPE transfer of staff to the partner. Furthermore, another post within Organisation Development currently filled by a secondee will be recruited to after the close of consultation – the interviews will be ring-fenced to Organisation Development staff who are directly affected by this change.</p>

3. Relevance/Proportion

Will the reorganisation proposal require an increase or decrease (change) in staff numbers?	YES - Decrease							
Is it likely to create public concern?	NO							
Do you feel there are any particular issues to take into account in relation to any of the protected characteristics listed below? <ul style="list-style-type: none"> • Age • Disability • Race • Gender reassignment • Marriage and Civil Partnership • Pregnancy and maternity • Religion and belief • Sex • Sexual Orientation 	YES							
<p>If you have answered YES to any these questions, what is the proposed Impact Assessment level of the proposal, plan or function?</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 15%;">Low</td> <td>Addition/Deletion of posts, no change to job descriptions and/or terms and conditions.</td> </tr> <tr> <td>Medium</td> <td>Addition/Deletion of posts, change to job descriptions, learning and development opportunities but no change to terms and conditions.</td> </tr> <tr> <td>High</td> <td>Addition/Deletion of posts and entire teams, learning and development opportunities, changes to job descriptions and terms and conditions including grade/pay, flexible working, allowances, overtime pay etc.</td> </tr> </table> <p>Then go to the full EIA below.</p>		Low	Addition/Deletion of posts, no change to job descriptions and/or terms and conditions.	Medium	Addition/Deletion of posts, change to job descriptions, learning and development opportunities but no change to terms and conditions.	High	Addition/Deletion of posts and entire teams, learning and development opportunities, changes to job descriptions and terms and conditions including grade/pay, flexible working, allowances, overtime pay etc.	High
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<p>If you have answered NO to all of these questions, list the evidence considered below and include the following statement in the Organisational Change Assessment report. Please ensure that this is signed off by the Head of Service.</p> <p>“This proposal was screened for impact on equalities on (insert date). The following evidence (insert evidence) has been considered. As a result of this screening, it has been decided that a full equality impact assessment is not required.”</p>								

Evidence Considered

Service Head	Martin Nottage
Signature	Martin Nottage
Date	23 Nov 2010

FULL IMPACT ASSESSMENT:

4. Data & Evidence

Review of relevant data	<p>List all examples of quantitative and qualitative data available that will enable the impact assessment to be undertaken. Try to use various data sources. The Equality and Human Rights Commission (EHRC) and Government Equalities Office (GEO) publishes many research reports on equalities.</p> <p>Example</p> <ul style="list-style-type: none"> • <i>Workforce Report</i> • <i>Department Demographic data</i> • <i>Staff Survey</i> • <i>Published workforce research</i> • <i>Equality and Human Rights Commission Reports</i> <p>The workforce report is a published report that can be found on the internet. This is published annually usually around June/July after the end of the financial year.</p> <p>The department’s demographic data can be obtained from Trent HR.</p> <p>Please note that if the reorganisation is for a small team, use division/department data. This is to ensure protection of personal data where individuals could be easily identifiable.</p> <p>Summarise the key information from the data/evidence and how it relates to the public sector duties (PSD)</p> <ul style="list-style-type: none"> • eliminate unlawful discrimination, harassment and victimisation; • advance equality of opportunity between different groups; and • foster good relations between different groups.
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Workforce Strategy

Key objectives of the workforce strategy include;

- To maintain and improve a diverse workforce and respond to equality and diversity issues
- Maintain a balanced workforce and recruitment of younger workers through the apprenticeship scheme

Workforce Report

- Disabled employees only make up 2% of the workforce which is lower than Borough and London populations of 15%
- On the whole, representation of Black and Minority Ethnic groups (31%) is higher than Borough and London populations except for the ‘other’ category
- At 6% the 16-25 age group is under-represented compared to Borough and London representation of 11% and 17% respectively
- At 28%, the 36-45 and 46-55 age groups have the highest representation in the council
- Representation of women at SMG level is not representative of the workforce profile at 38% compared to men at 65%

- Representation of BME at SMG level is only 10% compared to the workforce profile of 29%

Department Demographic Data

Finance and Corporate Services

- Workforce breakdown by department broadly mirrors the council's

Published Research – How Fair is Britain – Triennial Review 2010

- Muslim people have Only 1 in 4 Muslim women work and many face practical barriers preventing them from working
- Black people and disabled people in their early 20s are twice as likely to be not in employment, education or training as white people and non-disabled people
- A growing proportion of managerial and professional positions taken by women
- In Britain, 40% of female jobs are in the public sector compared to 15% of male jobs

5. Findings

<p>Assessment of impact</p>	<p><u>Employment</u></p> <p>Use the data to complete appendix 1 to identify the effect of the policy on different groups.</p> <p>From demographic data, look at the percentages of 'at risk' in relation to the department/division and general workforce. 'At risk' percentages above the department and general workforce population are considered negative impact. 'At risk' percentages at or below the department and council workforce population are considered neutral or positive impact. Concentrate on at risk percentages with a variance over 10%.</p> <p>Complete the table below by noting what the data is telling you about each group.</p> <p><i>In your response please consider:</i></p> <ul style="list-style-type: none"> • <i>How does the data identify potential or known positive impacts? What are the reasons?</i> • <i>How does the data identify any potential or known adverse impacts? What are the reasons?</i> • <i>Percentages can be deceiving so where numbers involved are small, make sure you note where this is the case.</i> <p>Remember each reorganisation is unique. In some cases, comparing the grades will also be important as well as the main protected characteristics especially as we know that women and BME are under-represented at SMG grade in the organisation.</p> <p>Where you do not have sufficient data, make it explicit for example 'We</p>
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currently do not have any data to make an objective assessment on this and there is limited research to inform our thinking'

Appendix 1 and 2



EIA - Reorg Impact Analysis v2.xls

Group	Impact (Positive Negative Neutral)	Comments/Reasoning
Age	Negative	<p>The age group 26-35 (29% representing 4 employees) is slightly over-represented in comparison to the department but is proportionate to the council.</p> <p>Additionally, the age group 36-45 (50% representing 7 employees) is slightly over-represented in comparison to both department and council in the employees impacted by the change.</p> <p>However, our priority is to create the opportunity for alternative employment (wherever possible) with our strategic partner rather than make people redundant.</p>
Disability	Neutral	<p>The statistics show there are no staff with known disabilities in the department and therefore do disabled staff are impacted by the change. However, it is plausible that some of the staff in the 'unknown' category may have a disability.</p>
Gender	Neutral	<p>Representation by gender is proportionate to both department and council demographics</p>
Race	Negative	<p>In terms of ethnicity, when looking at the data in greater detail, the 'white' group have more staff likely to impacted by this change (79% representing 11 employees).</p> <p>However, our priority is to create the opportunity for alternative employment (wherever possible) with our strategic partner rather than make people redundant.</p>
Sexual Orientation	N/A	<p>We currently do not have any data to make an objective assessment on this</p>

Religion/belief (including non-belief)	N/A	We currently do not have any data to make an objective assessment on this
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6. Consultation

Consultation	<p>This section is to be completed after you have consulted.</p> <p>Briefly describe who you consulted, when and the outcome. Please outline a brief summary of the responses gained and links to relevant documents, as well as any actions.</p> <p>This information is highly relevant for medium to high Impact EIAs.</p> <p>Remember to update the findings (section 5) after you have completed this section.</p>
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Consultation starts on 26 November 2010 – this section will be completed after the conclusion of the consultation period and consideration of all inputs to consultation – target 17 December 2010.

Consultation group	Date completed	Findings	Recommendations and Action
Age	23 December 2010	No disproportionate impacts found	None
Race	23 December 2010	No disproportionate impacts found	None

7. Mitigation

Measures to mitigate adverse impact	<p>From the data and consultation, have you identified any adverse impact? If so, are there changes that you could introduce which would make the proposal work better for this group of people? Is further research or consultation required?</p> <p>From Appendix 1, consider mitigating measures for at risk variances and especially those above 30%.</p> <p>Please consider:</p> <ul style="list-style-type: none"> • <i>Practical actions to reduce, justify or remove any</i>
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	<p><i>adverse/negative impact?</i></p> <ul style="list-style-type: none"> • <i>Are there learning and development opportunities?</i> • <i>How the policy can be revised, or additional measures taken, in order for the policy to achieve its aims without risking adverse impact?</i> • <i>Legal responsibilities under Disability requiring treating disabled people more favourably where necessary?</i> • <i>Have the plans been revised in light of the consultation results, to enhance positive impact or reduce/eliminate negative impact?</i>
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Based on the analysis of the data, there is not a disproportionate impact on any of the groups. No feedback received to suggest there are any disproportionate impacts.

8. Conclusions

<p>Outcome of Assessment</p>	<p>Summarise your findings and give an overview of whether the proposed reorganisation will meet the Council’s responsibilities in relation to equality. Pay particular attention to where differential adverse negative impact is identified taking into account mitigating measures.</p> <p>If the proposal is likely to have an adverse impact on any equality group how this can be justified? Make sure you outline the Economical/Technical/Organisation (ETO) reasons where applicable.</p> <p>It is also important to note where the analysis on staff at risk shows disproportionate negative impact and the expectation is that a large number of staff will secure roles in the new structure.</p> <p>Conclusions can be:</p> <p>1 – Proceed with the proposal <i>as is</i> either because there is no evidence to show adverse impact or there is justification to do so. Remember weighty reasons will be needed. It is important to underline that there is no justification for direct discrimination and that indirect discrimination will need to be justified.</p> <p>2- Adjust the proposal to remove any barriers and better promote equality which will include putting in place the mitigating measures or making changes to the proposal itself.</p> <p>3 – Abandon the policy if the risks of going ahead are high.</p>
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The financial situation is a dual driver:

- reduce costs (now)
- deliver bigger transformation savings, faster.

Based on this assessment and the pressure to change there is no reason why the proposed re-

organisation should not proceed. The proposed TUPE to HFBP mitigates the need for compulsory redundancies.

9. Action Plan

Action Plan	<p>Any actions that arise as a result of the impact assessment should be noted here. Please include responsibility and target date.</p> <p>Example <i>Complete a further EIA at the end of the restructure when the impact on the workforce is clearer.</i></p>
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Action	Responsibility	Date

10. Monitoring and Review

Post-Reorganisation Assessment	A review will be required once the proposal has been put in place to check what the actual impact was.
Outcome of Implementation	<p>Using Appendix 2, complete the details of the remaining staff. Look at the percentages of remaining staff compared to the ‘at risk’, department and council workforce population. Using the principles set out above, note your analysis.</p> <p>Note that where ‘remaining staff’ percentages are higher than the ‘at risk, then there was in fact a positive impact and this should be highlighted.</p> <p>Remember, percentages can be misleading so where numbers involved are small, make sure you note where it is the case.</p>

Date of Post – Reorganisation Assessment.	25 Jan 2011

Authorisation

Service Head	Martin Nottage
Signature	Martin Nottage
Date	Dec 2010
Date sent for publication	16 Feb 2011

Once you have filled in this document please send a copy to Employment Equalities Lead.