

Appendix 3 - Equality impact assessment

Major restructure (as defined by the Management of Change Policy) – organisational restructuring.

Organising for delivery programme (organisational redesign)

Officer completing assessment:

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Part 1 – Initial assessment

1. Aims and objectives

What are the aims and intended outcomes of the policy/project?

To restructure the organisation to deliver effectively the Mayor's commitments and statutory responsibilities and to ensure that this is done in the most cost efficient way.

2. Users/beneficiaries

Who will be the main users/beneficiaries of the policy/project?

It is expected that the organisation will run more effectively and so the changes will ultimately benefit Londoners (financially and in GLA delivery) and benefit organisations working with the GLA. The new structure will enable the Mayor to more effectively deliver his priorities and statutory responsibilities.

1. Content

The EQIA on this stage of the organisational restructuring deals with:

- 1.1. The potential impact of the restructuring on equalities issues (the workforce primarily but also the GLA's organisational delivery of equality objectives).
- 1.2. Any diversity risks arising from the restructuring and possible ways to minimise the risks and mitigate the negative impact, where it is identified.

2. Background

- 2.1. The organisational restructuring is being undertaken for a number of reasons (as set out in the BMAC report), namely to ensure the delivery of the Mayor's priorities, ensure the GLA can support London through the recession, to achieve the desired efficiency improvements and demonstrate organisational value for money. As the restructure focuses on organisational redesign rather than efficiency savings applied across the

board, it means that there are areas of the organisation that are more affected by the restructuring than others.

- 2.2. The Organising for Delivery redesign work started in 2008 and the organisation has completed the first stage, restructuring into five directorates: Communities and Intelligence, Development and Environment, External Affairs, Resources and the Secretariat, plus a separate, smaller Mayor's office and London 2012 Coordination Unit.
- 2.3. The Mayor's office has been significantly restructured over the last year and is not part of this current process.
- 2.4. The Secretariat is also not subject to this restructuring process. Some areas of the Secretariat were restructured in 2008/9 in light of changes to the Assembly's political composition. The major rationale for the current restructuring is to enable the GLA to better deliver the Mayor's priorities which is not a function of the Secretariat.
- 2.5. The existing structure consisted of some 753 posts, including short term posts. The new structure consists of 641 posts. The restructure proposes the deletion of 221 posts, 71 of which are vacant. There are 165 people at risk as a result of the proposals. 111 posts are being created and the net consequence is that there are 54 more staff than posts in the existing structure. This means a minimum of 54 possible redundancies. The figure could be higher as the skills required for some of the new jobs to be created may not be found in existing staff and would not be attainable with appropriate training.
- 2.6. The organisational redesign will be implemented in line with the GLA Management of Change Policy and the Compensations Payments Policy which has been agreed with Unison and incorporated into contracts of employment.

3. Impact of proposals on the workforce

- 3.1. A further equalities impact assessment will be undertaken towards the end of the restructure when the impact on the workforce is clearer. The monitoring of equality statistics will take place throughout the OfD restructuring, to ensure any negative impacts or trends are identified at an early stage. This will require the analysis of equality data for different stages of the process, such as selection processes. If there is any evidence in the statistics of disproportionate impact, the reasons will be identified as soon as possible and action taken if the impact cannot be justified.
- 3.2. An initial assessment has been undertaken on the workforce directly affected by the changes, in respect of posts proposed for deletion. This is set out in Appendix 1 and compares the staff at risk to the usual workforce profile to understand the impact on the workforce. It is important to note that the analysis is on staff at risk, but it is expected that a large number of staff will secure roles in the new structure.
- 3.3. There are a disproportionate amount of female staff in the "at risk" group at 62% of the total "at risk", whereas females staff make up 55% of all staff. This reflects the fact that a large number of the deleted posts are from business support, of which the majority of staff are female. It is anticipated that the majority of these staff will find posts in the new structure and as such there may not be a disproportionate overall impact on female staff; this will be kept under review and assessed throughout this process.

- 3.4. The proposed deletions appear to have slightly disproportionate negative impact on those staff over 40 years old. However the differences are small and there are no clear reasons identified for this. The Compensations Payments Policy could disproportionately advantage over 50 years olds if discretion was used to enhance pension contributions or in enhanced redundancy payments. This is considered to be objectively justified as the provisions for enhancement match statutory provisions and the exercise of discretion will be on a case by case basis.
- 3.5. The proposals appear to have a disproportionately negative impact on white staff though this is slight. Given the overall staffing numbers this is not considered to have a significant impact on the organisation.
- 3.6. There appears to be a disproportionate impact on disabled staff. However it is important to remember that these are staff at risk and not displaced staff. It will be important to monitor this throughout the process to ensure adjustments are made to the process to support disabled staff.
- 3.7. Figures for faith and sexual orientation do not seem to have significantly negative impacts to cause any concern.
- 3.8. It is known that women, black and minority ethnic and disabled staff are under-represented in the higher salary bands and the GLA is constantly working to address this issue. This will reviewed through the process to aim to develop a more representative senior team
- 3.9. There is currently no evidence that the restructure is likely to disproportionately impact any particular group. Although the Secretariat is not impacted by the organisational restructuring, at this time, and has a less representative workforce than other areas, the reasons for the Secretariat not restructuring are clear and set out above.

4. Compensation Payment Policy

The policy has been reviewed to meet the requirements of the age legislation and in keeping with the statutory provisions enhanced redundancy packages are weighted in favour of older staff and those with long service. The application of the policy is subject to the exercise of discretion. The exercise of discretion will be based upon an objective assessment of individual cases in relation to specific criteria and will be monitored to ensure that it is not detrimental to any equalities group. If the application of the policy is detrimental in relation to age, the monitoring will ensure that this can be objectively justified.

5. Job Descriptions / Person Specifications

- 5.1. Job descriptions and person specifications are being drafted subject to consultation on the new structure. Role specifications will contain objective criteria which have been reviewed by the HR team to ensure they are not discriminatory.

6. Process

- 6.1. Selection decisions will be closely monitored in relation to equalities information, in terms of assimilation, redeployment, and other outcomes and will be reported on in a further assessment. Appropriately experienced and trained HR staff will sit on all

selection interviews to ensure they are appropriately conducted with due consideration given to equalities issues.

- 6.2. HR staff will work with managers to draw up clear questions which are designed to measure key skills, experience and knowledge as set out in the person specification. Further guidance, to support this restructuring process, is being drawn up for the interview panel to advise them to use appropriate questioning techniques, ensure no stereotyping or bias is brought into the process and how to ensure objective testing. This guidance supplements existing guidance for interview panels and will focus on the competitive selection and redeployment interviews that will be part of the OfD process.
- 6.3. Structured interviews are seen to be the best way to avoid equality risks in the recruitment process. They will be designed with a view to minimising the equalities risks that could arise and to keep the process as robust and transparent as possible. Monitoring will be required to ensure risks have been minimised and this will take place during the process so that any issues emerge at an early stage.
- 6.4. A tight timetable may possibly have a negative impact on disabled staff or staff for whom English is not their first language, who may need more time than others to read information being provided to staff and to prepare applications. This could also be the case for long-term sick leave or those on maternity leave. Consideration and adjustments will be made to mitigate this as far as possible, with support for staff provided on completing applications. There will also be support for staff in managing change.
- 6.5. The HR team may recommend assessment exercises for appropriate posts to support the interview process. The HR team will provide guidance to managers to ensure assessments are objective, based on performance at interview. This is to ensure the process is as fair and open as possible where staff are competing against one another and to take into account that some people perform better in assessment exercises than in interviews. It is also important if there are important elements of the role that would be better tested in other ways than a structured interview process. All assessment exercises will be required to be job-related and will be checked by the HR team for any adverse impact on an equality group. Reasonable adjustments will be put in place for staff declaring a disability for any assessment exercise or interview process.
- 6.6. Redundancy payment will be in line with the recently amended Compensation Payments Policy, which has already been addressed.
- 6.7. Additional reasonable adjustments / extensions to support package will be made to accommodate any diversity – related difficulties that staff may face throughout the process. The information provided to staff on maternity leave advises on their additional legal rights.

7. Information Provision / Consultation

- 7.1. The information provided to staff has not been provided in different formats because suitable access arrangements/adjustments have already been made for disabled staff, but alternative formats could be made available if requested. Staff are offered a range of channels through which to submit their views or to seek further information.
- 7.2. All staff currently on long term sick leave and maternity leave have received all the communication in hard copies by post and have been advised how they can feed into

the process for consultation. Consideration will be given to dealing with any selection process required for these staff, which will be monitored as part of the process.

8. External recruitment

8.1. It is anticipated that at the end of the process, there may be vacancies that have not been filled on there may be vacancies that have not been filled on assimilation, selection or redeployment. The GLA is likely to ring-fence some of these initially for internal movement or promotion. External recruitment would provide an opportunity to improve the organisation's diversity profile though the Authority's more recent experience is that white candidates are more likely to be successful in recruitment exercises. However it has the potential for improving the diversity of staff, particularly at more senior levels of the organisation.

9. Impact of the proposal on delivery of equality objectives

9.1. It will be important to continue to monitor the impact of the change on the work that the GLA undertakes in relation to equalities. The Mayor has set out his new approach to equality issues in the Equal Life Chances for All Framework.

9.2. The restructuring contains proposals to change the current equalities team and the social inclusion team, deleting existing posts and creating new diversity and social policy roles. These roles will support the delivery of the Mayor's Equal Life Chances for All Framework. This team will focus broadly on all aspects of this and will be not be restricted to specialist roles.

9.3. Feedback received to date has argued that the loss of the word "equalities" from the team and job titles will have a detrimental impact on the equalities agenda. This will be assessed during the consultation period.

9.4. There is a proposal to disestablish the Advisor on Disability and Deaf Issues. However much work carried out by this role will be encompassed within the Diversity and Social Policy Team. There has been a change in the emphasis for high level advice on disability issues with a focus now resting on the Paralympics and therefore there is also proposed to be a post in the Olympics team, focusing on London 2012 accessibility issues.

9.5. Workforce equalities issues will be led by Executive Directors supported by the HR team, who will continue to provide management information, advice and support actions to ensure a diverse workforce at all levels of the organisation.

9.6. A number of posts have been created (on a short term basis) to focus on welfare to work and skills and employment. The work on skills and employment will continue to be delivered in line with the Mayor's strategy and it is proposed this will be undertaken by the Economic and Business Policy Team.

9.7. The proposal to disband the current stakeholders team will require consideration as to how the GLA will understand the disparate needs of London's communities, especially those most vulnerable. The External Affairs (public liaison team) will have a number of posts dedicated to community liaison work and the C&I Directorate will have posts which gather public opinion. Events work that was previously undertaken by Stakeholder teams will move to the Events team.

9.8. The Health team will continue to undertake work on the health inequalities strategy. The Health and communities area will deliver against a number of objectives in the Equal Life Chances for all Framework.

APPENDIX 1

Table 1: Employee at risk by gender			
	Total	%	All staff (as at last published workforce report 09/08)
Gender			
F	102	62%	55%
M	63	38%	45%
Grand Total	165	100%	100%
Table 2: Employee at risk by ethnic origin			
	Total	%	All staff (as at last published workforce report 09/08)
Ethnic Origin			
Asian or Asian British	11	7%	9%
Black or Black British	20	12%	14%
Chinese or any other ethnic group	5	3%	3%
White	126	76%	73%
Dual heritage	2	1%	2%
Not stated	1	1%	1%
Grand Total	165	100%	100%
Table 3: Employee at risk by disability			
	Total	%	All staff (as at last published workforce report 09/08)
Disabled			
Not stated	101	61%	39%*
No	43	26%	53%
Refused to answer	3	2%	As not stated *
Yes	18	11%	8%
Grand Total	165	100%	100%
			Note* not stated, refused to answer and blank are all including in the 39%

Table 6: Employee at risk by length of service

	Total	%	All staff by length of service
Under 1 years LOS	12	7%	11%
1 to 2 years LOS	24	15%	14%
2 to 5 years LOS	39	24%	28%
5 to 9 years LOS	90	54%	47%
Grand Total	165	100%	100%

Table 7: Employee at risk by sexual orientation

	Total	%	All staff (as at last published workforce report 09/08)
Heterosexual	121	73%	68%
Lesbian or gay man	5	3%	6%
Prefer not to say	6	4%	5%
Non stated	33	20%	21%
Grand Total	165	100%	100%

Table 8: Employee at risk by religion

	Total	%	All staff (as at last published workforce report 09/08)
Buddhist	1	1%	1%
Christian	52	32%	31%
Hindu	1	1%	2%
Jewish	1	1%	2%
Muslim	9	5%	4%
None	62	38%	33%
Other	7	4%	2%
Prefer not to say	3	1%	1%
Sikh	0	0%	1%
Not stated	29	17%	23%
Grand Total	165	100%	100%

Table 9: Employee at risk by age			
	Total	%	All staff (as at last published workforce report 09/08)
20 to 24	3	2%	3%
25 to 29	22	13%	15%
30 to 34	20	12%	22%
35 to 39	25	15%	18%
40 to 44	33	20%	15%
45 to 49	23	14%	11%
50 to 54	17	10%	7%
55 to 59	12	7%	5%
60 to 64	8	5%	3%
65 plus	2	1%	1%
Grand Total	165	100%	100%