



Equality Impact Assessment – Remote Working Policy HR Group

Configuration control

Electronic location: O:\HR GROUP\HR Policy\HR Projects\Remote Working Project\Impact Assessment

Document status: Final (11/03/2008)

Document author: Kay Watson

Document version: 1.0

Last amended: HQ856KW



1 Introduction:

- 1.1 Screening of the first draft of the remote working policy identified there may be both a negative and positive differential impact across the diversity strands.
- 1.2 A full equality impact assessment was undertaken and this report summarises the assessment.

2 Background:

- 2.1 Why does Land Registry need a remote working policy?
 - 2.1.1 Land Registry does not currently have a remote working policy.
 - 2.1.2 As part of Land Registry's duty of care for employee's health and safety we needed to ensure a risk assessment had been completed and controls put in place for remote workers.
 - 2.1.3 Project P189 remote working mandate included an underpinning Human Resources policy as an output.
- 2.2 Perceived problems:
 - 2.2.1 All diversity strands: Remote workers may encounter discrimination and this may be due to their race, religion, belief, disability, sexual orientation, age and/or gender, including transgender.
 - 2.2.2 Race, religion or belief: Employees may require a more flexible approach to remote working to enable them to meet religious observances.
 - 2.2.3 Disability: Disabled employees may require reasonable adjustments to enable them to work remotely.
 - 2.2.4 Gender: Female employees are more likely to have caring responsibilities, requiring a more flexible approach to remote working. Female employees may be slightly more apprehensive about working and travelling alone.

3 Methodology and Sources of Data:

- 3.1 The following research and consultations identified the impacts in Section 4 and mitigations in Section 5.
- 3.2 Legal requirements and research:
 - 3.2.1 Previous work had established a matrix of Human Resources subjects that would need to be considered.
 - 3.2.2 OFSTED, DEFRA, Customs and Excise, DTI and MOD provided copies of their remote working, teleworking, home working and flexible working policies.
 - 3.2.3 XpertHR provided interpretation of the relevant legislation and generic policies for home working and sales staff.



3.3 Business Requirements:

- 3.3.1 Stakeholders attended a series of workshops and meetings that were held to establish the business needs. From this the project mandate was produced setting out the scope of the project.
- 3.3.2 The blueprint sets out the future business requirements, and the project scope was aligned to this.
- 3.3.3 Regular project meetings ensured any changes to the scope or requirements were logged and incorporated into the final remote working policy.

3.4 Stakeholders:

- 3.4.1 The Health and Safety and Human Resources work stream leads met several times to ensure consistency across both policies.
- 3.4.2 The project Senior Responsible Owner (SRO) and Senior User reviewed the draft policy and changes were made based on their comments.
- 3.4.3 Users on the Extended Proof of Concept trial were issued with a first draft of the policy and provided feedback on how it worked in practice.

3.5 Departmental Trade Union Side (DTUS):

- 3.5.1 Formal consultations commenced in September 2007.

3.6 Disability Focus Group:

- 3.6.1 At a meeting on 6th March 2008 the Disability Focus Group discussed the draft policy and identified differential impacts and potential mitigations.

3.7 Black and Minority Ethnic (BME) Focus Group:

- 3.7.1 At a meeting on 20th February 2008 the Black and Minority Ethnic focus group discussed the draft policy and identified differential impacts and potential mitigations.

3.8 Lesbian, Gay, Bisexual and Transgender (LGBT) Group:

- 3.8.1 At a meeting on 31st January 2008 the LGBT group discussed the draft policy and identified differential impacts and potential mitigations.

3.9 The Equality and Human Rights commission website:

- 3.9.1 This website was used to research the legal requirements on other organisations, which can be summarised as:
 - 'It is unlawful for a public authority exercising a function of a public nature to perform any act which constitutes discrimination. This applies to all the legal grounds for discrimination.
 - It is unlawful for organisations to discriminate in providing goods, facilities or services to the public on the grounds of sex, race, disability, gender, sexual orientation, and religion or belief.'¹
- 3.9.2 These legal requirements should help prevent Land Registry employees encountering discrimination whilst travelling on public transport, staying in hotels and when visiting customer's premises.



4 Assessment of Impact:

4.1 All diversity strands:

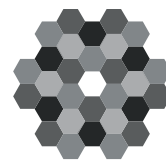
- 4.1.1 Whilst working remotely employees may encounter discrimination from customers or 3rd parties. For example whilst using public transport, staying in hotels and so on.
- 4.1.2 Remote workers will interact with a diverse customer base; this carries the potential risk of discrimination by either party. This may be due to individuals making assumptions, communication barriers, a lack of awareness of cultural differences and so on.
- 4.1.3 Due to their personal prejudices some customers may request a different contact.
- 4.1.4 Remote workers are a visible presence as they interact with Land Registry's customers and 3rd parties. Enabling employees who fall in one or more of the diversity strands to work remotely visibly demonstrates Land Registry's commitment to diversity and promotes a positive message to the wider community.

4.2 Race, religion or belief:

- 4.2.1 Some remote workers may be required to meet religious observances that relate to their race, religion or belief. The common requirements can be summarised as:
 - The ability to work flexibly to enable remote workers to meet religious observances. For example taking short breaks during the day for prayer, attending a place of worship at a specified time.
 - Flexibility to meet other religious observances, for example requesting Halal or kosher meals.
- 4.2.2 Some customers may request assistance to help them communicate more effectively. For example they may request to conduct business in Welsh.

4.3 Disability:

- 4.3.1 Disabled employees may require reasonable adjustments to enable them to be a remote worker. The common requirements can be summarised as:
 - The ability to work flexibly.
 - To be supplied with suitable equipment.
 - The ability to select the most suitable method of travel.
 - The ability to request a hotel room that is appropriately equipped.
 - Flexibility to meet one off situations.
 - For the policy to avoid the use of acronyms, which can be difficult to read.
- 4.3.2 Some customers may require reasonable adjustments, for example documents in large print, using Textphone or Minicom and so on.



4.4 Gender:

4.4.1 A higher proportion of female employees have caring responsibilities, which may require a more flexible approach to remote working. The common requirements can be summarised as:

- The ability to work a flexibly to enable them achieve a balance with their caring responsibilities.
- Flexibility to meet one off situations.

4.4.2 Female employees may be more apprehensive about working and travelling alone. The common requirements can be summarised as:

- The ability to plan when they travel, avoiding travelling at night or other quiet times.
- The ability to select a ‘safe’ method of transport.
- The ability to stay in hotels that belong to the ‘Women Aware’ scheme.

4.5 Sexual Orientation:

4.5.1 The common requirements can be summarised as:

- The ability to request specific hotel rooms where they feel comfortable (safe), comparable to the ‘Women Aware’ scheme.
- The ability to protect their privacy and ensure that assumptions are not made that could result in them being ‘outed’ at work.

5 Consideration of Alternative Approaches and /or Mitigation of Adverse Impact:

5.1 All diversity strands, the following mitigations have been put in place:

- The induction guidance requires all remote workers and their managers to read the ‘working out of the office handbook’. This contains preventative advice on avoiding situations where remote workers may be subjected to harassment, bullying, discrimination or victimisation.
- The policy guidance makes it clear remote workers can remove themselves from vulnerable situations.
- The policy guidance requires employees who encounter harassment, bullying, discrimination or victimisation whilst working remotely to inform their manager. Managers are required to refer incidents to the appropriate person who will take action to prevent a reoccurrence.
- Within reason remote workers have the ability to plan when they travel, Manager’s have discretion to approve a different method of travel or an overnight stay if an employee would otherwise have travel alone late a night.
- The risk assessment identified that all lone workers should have a mobile phone as a control.



- Expotel, our hotel booking partner, has the facility for all travellers to make special requests regarding their room booking so that they feel as safe as possible. This effectively extends the 'Women Aware' scheme to all remote workers.
- The induction guidance requires remote workers to receive diversity and communications skills training and to read the Cultural Diversity Handbook.
- Land Registry publicity documentation should reiterate our diversity policy, which includes not tolerating discrimination from customers.
- Guidance already exists on the Customer Service Intranet sites about the assistance that can be provided if a customer has a sight or hearing impairment. In addition some offices maintain a list of staff that can speak another language but we reserve the right to conduct business in English.
- If a customer requests a different contact because of personal prejudice they must be advised that we do not tolerate discrimination. However, it may be in an employee's interest to remove them from the situation.

5.2 Race, Religion or Belief:

- The working patterns policy sets out the options for working flexibly to meet religious observances.
- Religious observances involve an element of self-management and within reason our policies enable employees to do this. In addition the remote working guidance enables employees to discuss any specific requirements with their manager. Managers are responsible for considering how they can meet individual needs whilst still meeting customer and business needs.

5.3 Disability:

- The working patterns policy sets out the options for working flexibly as a reasonable adjustment.
- The policy requires disabled employees to inform their manager if they require reasonable adjustments. Managers are responsible for putting appropriate reasonable adjustments in place. For example agreeing the employee can travel by car rather than public transport, providing specific equipment and so on.
- Managers have discretion to agree pragmatic solutions for one off situations.
- The policy has been written avoiding the use of acronyms.

5.4 Gender:

- The working patterns policy sets out the options for working flexibly to meet caring responsibilities.
- The policy guidance enables employees to refer incidents to the Counselling and Support Officer or Harassment Advisor rather than their manager, this can maintain confidentiality and avoid 'outing' a transgender employee.

5.5 Sexual Orientation:



- The policy guidance enables employees to refer incidents to the Counselling and Support Officer or Harassment Advisor rather than their manager, this can maintain confidentiality and avoid inadvertently 'outing' a Lesbian, Gay or Bisexual employee.

6 Monitoring Arrangements:

- 6.1 The monitoring arrangements already exist in other policies and procedures as follows:
- The working patterns equality impact assessment contains the monitoring arrangements for flexible working.
 - The recruitment process includes monitoring across all diversity strands to ensure equality of opportunity. Monitoring will therefore be completed for each remote working post as it is filled.
 - The performance appraisal system requires managers to record if an employee has requested a reasonable adjustment and the action taken.
 - The electronic DSE assessments ensure action is taken if an employee requires a reasonable adjustment.
 - Reported incidents of harassment, bullying, discrimination and victimisation are already recorded and analysed by diversity strand.

7 Formal Consultation:

- 7.1 Section 3 outlines the consultation and research undertaken as part of the policy development. This helped to identify the impacts detailed in Section 4 and the mitigations in Section 5.
- 7.2 Incorporating the equality impact assessment into the policy development was a sensible approach. This ensured that the consultations had a wider focus and considered both business and individual needs.
- 7.3 Consultation with the focus groups helped to identify differential impacts that affected all diversity strands and also more specific impacts. They also commented on mitigations identified at previous focus groups, helping to refine them.
- 7.4 The progression of the consultations resulted several iterations of the policy.

8 Publication of Equality Impact Assessment:

- 8.1 This report will be annexed to the remote working policy and published on the Intranet.

9 Conclusions:

- 9.1 Undertaking the equality impact assessment as part of the policy development was a logical approach and ensured the final version contains the mitigations identified in Section 5.